

### Title:

**\*\*People of the Philippines vs. Hon. Judge Auxencio C. Dacuycuy, et al.\*\***

### Facts:

The case originated from a complaint filed by the Chief of Police of Hindang, Leyte, against Celestino S. Matondo, Segundino A. Caval, and Cirilo M. Zanoria, public school officials in Leyte, for a violation of Republic Act No. 4670 (Magna Carta for Public School Teachers). The complaint was filed in the Municipal Court of Hindang, Leyte, on April 4, 1975, where the defendants pleaded not guilty and moved to quash the complaint citing lack of jurisdiction due to the correctional nature of the penalty of imprisonment prescribed for the offense. The motion was denied, and upon denial of the reconsideration plea, they filed a petition for certiorari and prohibition with preliminary injunction before the Court of First Instance of Leyte, alleging lack of jurisdiction and unconstitutional nature of Section 32 of RA 4670. The petition was moved to another branch correlating with a related case, where the trial court upheld the constitutionality of RA 4670 but declared municipal and city courts lacked jurisdiction over such cases, redirecting the case for preliminary investigation only.

### Issues:

1. Whether municipal and city courts have jurisdiction over violations of Republic Act No. 4670.
2. Whether Section 32 of Republic Act No. 4670 is constitutional.

### Court's Decision:

1. **\*\*On the Constitutionality of Section 32 of RA 4670\*\***: The Supreme Court declared the imprisonment penalty in Section 32 of RA 4670 unconstitutional due to the absence of a prescribed period, marking it as an undue delegation of legislative power to the judiciary and violating the doctrine of separation of powers.
2. **\*\*On Jurisdiction Over Violations of RA 4670\*\***: With the imprisonment provision in Section 32 declared unconstitutional, the Supreme Court ruled that the jurisdiction over violations of RA 4670 involving fines falls within the ambit of municipal and city courts as per the jurisdictional thresholds set by the laws at the time of the commencement of the action.

### Doctrine:

The decision reiterates the principle that legislative bodies cannot delegate the essential

legislative function of prescribing the terms and durations of penal sanctions to the judiciary, which is a violation of the separation of powers principle. Moreover, penalties without prescribed durations are unconstitutional due to the vagueness and undue delegation of legislative powers.

### Class Notes:

- **Doctrines of Non-Delegability of Legislative Powers**: Legislative functions, particularly those prescribing penalties, cannot be delegated to another branch of government.
- **Separation of Powers**: Each branch of the government has specific powers and functions that should not be encroached upon by another branch, especially in legislative matters regarding penalty impositions.
- **Penalty Prescriptions**: Both components of penalties (e.g., minimum and maximum durations or amounts) need to be clearly defined by the legislature to avoid vagueness and ensure fairness in judicial applications.

### Historical Background:

This case highlights the unique intersection between educational policy, as outlined in the Magna Carta for Public School Teachers, and judicial interpretation of punitive measures within the statute. It illustrates a rare legislative oversight in terms of specifying the duration of imprisonment penalties, leading to significant constitutional scrutiny and the reaffirmation of fundamental principles of legislative power and judicial authority in the Philippines.