Title: People of the Philippines vs. Federico Bustamante

Facts:
Federico Bustamante was initially wed to Maria Perez on August 9, 1954, before the Justice of the Peace of Binalonan, Pangasinan. Despite this existing marriage, Bustamante entered into a second marriage with Demetria Tibayan on September 16, 1955. The second marriage was solemnized by Vice-Mayor Francisco B. Nato of Mapandan, acting as mayor during the incumbent mayor's leave of absence. Bustamante lived with Demetria for about a month before he returned to his first wife, Maria Perez. Demetria, upon searching for Bustamante, discovered his previous marriage from the municipal authorities of Binalonan and brought this to light, leading to the criminal prosecution for bigamy.

The case started in the Court of First Instance of Pangasinan, where Bustamante was convicted of bigamy. He then appealed to the Supreme Court of the Philippines on points of law, primarily contesting the authority of Francisco Nato to solemnize the second marriage.

Issues:
1. Whether the second marriage solemnized by Francisco Nato was valid given that he was an acting mayor, not the duly elected mayor.
2. Whether the misnomer in the information regarding the officiant of the marriage invalidated the charge of bigamy.

Court's Decision:
1. **Authority of the Acting Mayor:**
Bustamante argued that Vice-Mayor Nato, acting as mayor, did not have the authority to solemnize the marriage based on Article 56 of the Civil Code of the Philippines. He referred to a distinction between an "Acting Mayor" and a "Vice-Mayor acting as Mayor" made in a different case (Salaysay vs. Castro). The Court found this argument untenable, asserting that the vice-mayor, when properly acting as mayor, holds the full powers of that office. The Court differentiated this present case from Salaysay vs. Castro, which involved election laws, by emphasizing that it does not pertain to the legitimacy of the office occupancy but the exercise of its functions.

2. **Misnomer in Information:**
The Court addressed the claim that the information erroneously stated the officiant of the second marriage. The Supreme Court maintained that such a mistake was unsubstantial and immaterial. The essence of the charge of bigamy was that a second marriage occurred while the first was still in effect. The incorrect naming of the officiant did not prejudice the

defendant's understanding of the charges against him. As long as the timing and location of the second marriage were correctly stated, the charge remained valid.

Doctrine:
The Supreme Court reinforced that:
1. **The Vice-Mayor acting as Mayor** exercises all the powers and duties of the Mayor, including the authority to solemnize marriages.
2. **Substantial truths over immaterial inaccuracies:** Errors in the information that do not affect the core of the accusation and do not prejudice the defendant's rights do not vitiate the charges.

Class Notes:
– **Bigamy (Art. 349 of the Revised Penal Code):** Bigamy is committed by a person who contracts a second or subsequent marriage before regaining the full legal capacity to remarry. Penalty involves prison mayor.
– **Authority of Acting Officials (Sec. 2195, Revised Administrative Code):** Acting officials wield the same powers and responsibilities as the regular positions they temporarily assume.
– **Procedural Prejudice:** Non-prejudicial procedural errors do not invalidate criminal charges where the defendant remains adequately informed of the accusations.

Historical Background:
The context of this decision is rooted in the application of the post-World War II legal framework of the Philippines which sought to ensure the integrity of legal and civil proceedings. The reliance on the Revised Penal Code and the Civil Code reflects the adaptation of Spanish-influenced laws into Philippine jurisprudence, and the evolving interpretation of temporary power assignments shows the administration's flexibility in governance. The case underscores the practical application of laws within the shifting dynamics of post-colonial governance structures.