

Title:

Victoria Ong de Ocsio vs. Court of Appeals and The Religious of the Virgin Mary, 252 Phil. 754 (1989)

Facts:

The case revolves around a conflict of property ownership involving two parcels of land, Lot No. 1272 and Lot No. 1273, in the City of Iligan. Victoria Ong de Ocsio claimed ownership of these two lots based on a 15-year personal possession and a 60-year possession by her predecessors-in-interest. Contrasting Ocsio's claim, the Religious of the Virgin Mary (RVM) asserted that they had bought the lots from Ocsio and had been in possession of them for over four years, with their and their predecessor's possession being immemorial.

The conflict emerged during cadastral proceedings initiated by the Director of Lands for the adjudication of titles to land. After hearing the conflicting claims, the Cadastral Court decided in favor of RVM, determining that Ocsio did indeed sell Lot No. 1272 to RVM via a deed of sale dated April 12, 1956, and that Lot No. 1273 was a road lot belonging to the City of Iligan. Ocsio was ordered to remove any buildings she had on Lot No. 1272 within 90 days.

Unsatisfied with the ruling, Ocsio appealed to the Court of Appeals, which affirmed the Cadastral Court's decision in toto. She then filed an appeal by certiorari with the Supreme Court of the Philippines, arguing factual error in the determination of the sale of the lot to RVM and a legal question regarding the ability of RVM, a religious corporation, to acquire and register land under the 1973 and 1987 Constitutions.

Issues:

The legal issues raised in the Supreme Court's decision were:

1. Whether the findings of fact of the Court of Appeals about the sale of Lot No. 1272 to RVM were binding.
2. Whether the constitutional provisions disqualify a religious corporation from acquiring land and registering it in its name under the 1973 and 1987 Constitutions.

Court's Decision:

The Supreme Court upheld the findings of the lower courts, ruling that the factual findings of the Court of Appeals were conclusive and could not be reviewed by the Supreme Court. Regarding the legal issue, the Court declared that under current doctrine, the possession of alienable public land for a sufficient period, as prescribed by the Public Land Act, converts

the land into private property. It held that a juridical person such as RVM could have its title to the land confirmed in its name, provided that the land had already become private property before the juridical person acquired it. Therefore, the Court affirmed the decision of the Court of Appeals, confirming the title of Lot No. 1272 in the name of RVM.

Doctrine:

The doctrine reiterated in this case was that open, continuous, and exclusive possession of alienable public land for at least thirty years as directed by the Public Land Act ipso jure converts the land into private property, and a juridical person can have the title to such property confirmed in its name, provided the land had already been converted to private ownership prior to acquisition by the juridical person.

Class Notes:

- The finality of factual findings by the Court of Appeals: The Supreme Court generally does not review factual findings of the Court of Appeals unless there are exceptional circumstances not present here.
- Acquisition of land by religious organizations: A juridical person can own and register land previously converted into private property under the Public Land Act by natural persons despite prohibitions in the 1973 and 1987 Constitutions, as affirmed in *Director of Lands v. I.A.C.*, 146 SCRA 509 (1986).

Historical Background:

In the historical context of Philippine law, juridical persons such as corporate entities or religious organizations were often restricted or disallowed from owning or acquiring land. The case of *Victoria Ong de Ocsio vs. Court of Appeals and The Religious of the Virgin Mary* reflects the evolving jurisprudence towards the recognition that juridical persons can acquire property originally public land which has been converted into private land by possession as per the Public Land Act. This constitutes a significant development in property law and the rights of corporations and religious entities in the Philippines.