

****Title:**** Alvarico v. Sola: A Conflict of Claims in Land Ownership and Transfer

****Facts:****

This case arose from a disagreement over the ownership of a piece of land located in Cebu City, Philippines, which was awarded and sold by the Bureau of Lands. Castorio Alvarico, the natural father of respondent Amelita Sola and nephew of Fermina Lopez (Amelita's adoptive mother), contested the land's ownership against Amelita.

On June 17, 1982, the Bureau of Lands granted Fermina López's Miscellaneous Sales Application (MSA) for the purchase of several lots, including Lot 5, leading to Fermina making a partial payment for them. Subsequently, on May 28, 1983, Fermina executed a Deed of Self-Adjudication and Transfer of Rights transferring Lot 5 to Amelita, who agreed to assume all obligations related to the MSA. Amelita fulfilled these by paying the total amount of P282,900, and on April 7, 1989, the Bureau of Lands approved the transfer.

An Original Certificate of Title (OCT) was issued in favor of Amelita on May 2, 1989. However, Castorio Alvarico filed a civil case for reconveyance on June 24, 1993, arguing that Fermina had donated the land to him on January 4, 1984, and he had taken possession since then.

The Regional Trial Court (RTC) of Cebu City initially found in Alvarico's favor, ordering the reconveyance of the land to him. However, the Court of Appeals reversed this decision, and Alvarico's motion for reconsideration was denied, leading to the filing of the instant petition to the Supreme Court.

****Issues:****

1. Whether the Court of Appeals erred in finding the Deed of Donation as merely a private document despite being notarized.
2. Whether the Court of Appeals erred in applying the principle that registration of the sales patent constitutes the operative act that conveys ownership of the land to the applicant.
3. Whether the Court of Appeals erred in concluding that respondent acquired the land in question in good faith.
4. Whether the Court of Appeals erred in interpreting possession under Article 1544 of the New Civil Code in favor of the respondent.

****Court's Decision:****

The Supreme Court found no reversible error in the decision of the Court of Appeals, affirming that the complaint filed by Castorio Alvarico against Amelita Sola was properly dismissed. The Supreme Court emphasized that the issuance of the OCT in Amelita's favor, the due execution of the Deed of Self-Adjudication and Transfer of Rights, and the payment of the land fully support her claim to the property. Furthermore, it was stated that only the State, through the Solicitor General, has the authority to initiate reversion proceedings, thereby negating Alvarico's stand to question the validity of Amelita's title based on the Public Land Act.

****Doctrine:****

1. ****Torrens Title Presumption:**** A Torrens title is presumed regular and serves as notice to the whole world. No one can plead ignorance of its registration.
2. ****Authority in Reversion Proceedings:**** Only the Solicitor General or the officer acting in his stead may institute actions for reversion to the Government of lands of the public domain.

****Class Notes:****

- ****Torrens Title System:**** Demonstrates the principle of "indefeasibility" of a registered title, highlighting its significance as evidence of lawful ownership, binding to the whole world.
- ****Public Land Act (Sec. 101):**** Reversion of lands to the public domain is exclusively the prerogative of the State, demonstrating the limited standing of private parties in contesting land titles originating from government grants.

****Historical Background:****

This case highlights the intricate nature of land ownership disputes in the Philippines, particularly involving lands granted by the government. The procedural posture reflects the judicial process's evaluative stages, from trial courts through appeals and finally, to the supreme adjudication by the Philippine Supreme Court. It also underscores the nuances of the Philippine legal system's treatment of land ownership, registration, and the critical role of the Torrens system in providing security and definitiveness to land titles.