

Title: Republic of the Philippines v. The Heirs of Meynardo Cabrera, et al.

Facts:

In 1971, Meynardo Cabrera filed a free patent application for an 8,072 square-meter land in Roxas, Oriental Mindoro, claiming possession since 1936 through his predecessor. The same year, the Bureau of Lands issued Free Patent No. 516197, and the Original Certificate of Title (OCT) No. RP-132 (P-9193) was issued, covering two lots in Meynardo's name. Later, a portion of Lot 1 was transferred to Consolacion Dimaculangan Cabrera, and Transfer Certificate of Title (TCT) No. 16580 was issued in her name. Consolacion sold portions of Lot 1-A to various purchasers.

The issuance of TCT No. 16580 led Jose and Leticia De Castro to petition the Department of Environment and Natural Resources (DENR) for an investigation into Lot 1-A's land classification. The DENR Final Report in 1994 declared Free Patent No. 516197 null and void as it covered public domain land. Consequently, the DENR Regional Executive Director declared the Free Patent No. 516197 null and void in 1997. On November 15, 1999, the Republic filed a complaint for annulment/cancellation of the patent and titles, and for reversion of the Roxas Properties to the State.

The Regional Trial Court (RTC) dismissed the complaint, and the Court of Appeals (CA) affirmed this decision. The Republic then filed a Petition for Review on Certiorari under Rule 45, asserting issues with the CA's decision, specifically regarding the necessity of a positive act of government to reclassify land from alienable and disposable to forest.

Issues:

1. Whether the Court of Appeals erred in holding that a positive act of government is necessary for the reclassification of land from alienable and disposable to forest land.

Court's Decision:

The Supreme Court denied the Republic's petition, affirming the CA's decision. The Court underscored that the classification and reclassification of public lands are executive functions, which require a positive act of reclassification by the Executive Department. Since the Republic failed to present any presidential order, proclamation, or act proving the reclassification of the Roxas Properties to forest land, the complaint for reversion was rightfully dismissed.

Doctrine:

The classification and reclassification of public lands into alienable or disposable, mineral,

or forest land are exclusive prerogatives of the Executive Department, performed through the President or authorized officials. A positive act of reclassification is necessary for such changes, and in reversion proceedings, the State bears the burden of proving that the land in question was inalienable at the time of issue.

Class Notes:

1. **Regalian Doctrine**: All lands of the public domain belong to the State.
2. **Reclassification of Public Lands**: Requires a positive executive act, evidenced by presidential orders, proclamations, or legal acts.
3. **Reversion Proceedings**: The State must prove that the land was inalienable at the time it was disposed of, bearing a heavy burden of proof to justify the reversion of registered titles back to the public domain.

Historical Background:

This case highlights the complexities involved in land classification and the essential necessity for clear, authoritative actions by the executive branch in reclassification matters. It underscores the rigorous standard of proof required in reversion cases, where land previously disposed of is sought to be reclaimed by the State, emphasizing the principle that land classification decisions reside within the executive sphere, not judicial or individual discretion.