

**\*\*Title:\*\*** De La Cruz vs. Iglesia Ni Kristo: A Legal Battle Over Friar Land Ownership

**\*\*Facts:\*\***

This case revolves around Lot 671 of the Piedad Estate, a piece of friar land adjacent to the main church of respondent Iglesia Ni Kristo in Quezon City, Philippines.

In 1975, the De La Cruz family, descendants of Policarpio De La Cruz, filed a lawsuit against Lucia De La Cruz and Iglesia Ni Kristo, asserting ownership of 122,845.32 square meters of Lot 671, claiming it as part of their inheritance. The De La Cruz family believed they were co-owners of the property, with Lucia managing it on their behalf. Over the years, Lucia purportedly gave them small amounts of produce and cash as shares, though these were insufficient indicators of the property's true value. After discovering the land's significant worth and Lucia's dealings that seemingly excluded them, the De La Cruzes sued for recovery of ownership, possession, and damages.

Lucia De La Cruz and Iglesia Ni Kristo defended their titles to the land. Lucia claimed the land was purchased by Dorotea De La Cruz and Eugenia De La Paz from the Philippine Government, which eventually sold it to her. Iglesia Ni Kristo, having bought the property from Lucia, argued it was a purchaser in good faith and for value.

The case proceeded through the Philippine legal system; the trial court sided with the De La Cruz family, acknowledging their co-ownership and the subsequent bad faith of Iglesia Ni Kristo's purchase. However, upon appeal, the Court of Appeals reversed this decision, dismissing the De La Cruz family's claims on the grounds that Policarpio De La Cruz never legally owned the land, hence no co-ownership or trust in their favor existed.

**\*\*Issues:\*\***

1. Whether Policarpio De La Cruz held legal ownership of Lot 671, thus entitling his descendants to claims over it,
2. Whether a trust was formed by Lucia De La Cruz in managing the property for her siblings' descendants,
3. The legal effect of reconstituted titles held by Lucia De La Cruz,
4. Whether Iglesia Ni Kristo was an innocent purchaser for value.

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

The Supreme Court affirmed the Court of Appeals' decision, ruling that Policarpio De La

Cruz had no legal title to the land, being merely an actual settler or occupant with a preference to buy which was never actualized. Framed by the Friar Lands Act and applicable jurisprudence, the unexercised preference to purchase the land did not vest Policarpio, and by extension his descendants, with any proprietary rights.

The Court further declared that no trust relationship was created regarding the land in question. Moreover, it upheld the indefeasibility and imprescriptibility of the Torrens system's titles, including those held by Lucia De La Cruz and, consequentially, Iglesia Ni Kristo. The latter was deemed a purchaser in good faith, having diligently settled conflicting claims before acquisition.

**\*\*Doctrine:\*\***

The case reiterates the doctrine of indefeasibility and imprescriptibility of a Torrens title, emphasizing the principle that a registered title under the Torrens system cannot be challenged on the basis of informal agreements or unregistered claims.

**\*\*Class Notes:\*\***

- Policarpio De La Cruz's failure to actualize his preference to purchase Lot 671 under the Friar Lands Act resulted in no legal ownership.
- The Torrens system underscores the principle of "security of title," affirming that registered land titles are incontestable after one year from registration, protecting bona fide purchasers.
- Trusts concerning immovable property cannot be established without clear and convincing evidence.
- Claims of ownership based on occupant preferences under the Friar Lands Act must follow appropriate legal application and payment processes to be valid.
- **\*\*Relevant Legal Statutes:\*\***
- Friar Lands Act (Public Act No. 1120)
- Land Registration Act (Act No. 496), specifically Sections 38 and 39 regarding the indefeasibility and imprescriptibility of registered titles.

**\*\*Historical Background:\*\***

This case illuminates the complexities surrounding friar lands in the Philippines - vast tracts purchased by the American colonial government from religious orders and later sold to actual occupants. The legal nuances of these lands, their acquisition by the government, and

the subsequent sale process provide a historical context to disputes over such properties. Policarpio De La Cruz's status as an actual settler highlights the significance of landownership documentation and the failure of many actual settlers to formalize their claims, leading to modern-day legal contests.