

****Title: Republic of the Philippines v. Annabelle Ontuca y Peleño****

****Facts:****

Annabelle Ontuca y Peleño became the focus of legal proceedings regarding the correction of several errors in her daughter Zsanine Kimberly Jariol y Ontuca's birth certificate. The birth occurred on August 14, 2000, with Corazon Carabeo, a midwife, assisting. Carabeo volunteered to register the birth but made several errors on the certificate: adding "Mary" to Annabelle's first name, misspelling Annabelle's middle name as "Paliño," incorrectly stating Annabelle was married, and incorrectly listing Annabelle as the informant.

To rectify these errors, Annabelle filed a petition under Rule 108 of the Rules of Court at the Regional Trial Court (RTC), which after hearings, granted the corrections on November 15, 2016. The Office of the Solicitor General (OSG), however, contested part of the decision, arguing issues of jurisdiction and procedural errors. The RTC's denial of the OSG's motion for reconsideration led to this petition for review on certiorari to the Supreme Court.

****Issues:****

1. Whether the RTC correctly exercised its jurisdiction under Rule 108 of the Rules of Court to correct the errors on the birth certificate, particularly concerning the name and civil status changes.
2. Whether the corrections were clerical or typographical errors amendable under RA No. 9048, as amended, or substantial changes necessitating compliance with Rule 108's procedural requirements.
3. Whether the RTC proceedings complied with the necessary procedural requirements for correcting the substantial errors regarding the civil status in the birth certificate.

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

The Supreme Court partly granted the petition, sustaining the corrections to Annabelle's first name and middle name as clerical errors rectifiable under Rule 108 or RA No. 9048, as amended. This decision was supported by evidence from Annabelle's IDs, showing the correct spelling of her names, thus fitting the criteria for "clerical or typographical error" described in the law. However, the Court set aside the RTC's correction of the child's parents' marriage status, ruling it as a substantial change that impacts the child's legitimacy. The Court found procedural missteps in the RTC process, particularly the failure to implead and notify all interested parties as mandated, rendering the proceedings for this correction void.

****Doctrine:****

1. Clerical or typographical errors include misspelling of names or incorrect data that is visible to the eyes or obvious to the understanding, which can be corrected by referencing existing records, under RA No. 9048, as amended.
2. Substantial errors involving changes that affect civil status, citizenship, or nationality require adherence to the procedural requirements specified in Rule 108, necessitating impleading all interested or affected parties.

****Class Notes:****

- Clerical or Typographical Error: Defined under Section 2(3) of RA No. 9048 as a mistake in writing, copying, transcribing, or typing an entry in the civil register which does not affect the substantive rights of the person and can be corrected by reference to other existing records without altering significant legal rights.
- Substantial Changes: Refer to alterations in civil registry entries that affect substantial, legal rights, such as citizenship, legitimacy, or marital status, and must undergo an adversarial process as outlined in Rule 108 of the Rules of Court, ensuring that all affected parties are properly notified.

****Historical Background:****

This case juxtaposes two legal mechanisms for correcting errors in civil registry documents: administrative corrections for minor errors under RA No. 9048, as amended by RA No. 10172, and judicial corrections for more substantial errors under Rule 108 of the Rules of Court. The decision underscores the tension between facilitating straightforward corrections and safeguarding substantive legal rights, a recurring theme in the jurisprudence concerning identity documentation and state registries.