

### Title:

Willem Beumer v. Avelina Amores: A Case on the Dissolution of Conjugal Partnership and the Limits of Foreign Ownership in Philippine Real Estate.

### Facts:

Willem Beumer, a Dutch national, and Avelina Amores, a Filipina, got married in 1980. Their marriage was later annulled in 2000 due to Beumer's psychological incapacity. Subsequently, Beumer petitioned for the dissolution of their conjugal partnership, seeking the distribution of several properties he claimed were acquired during their marriage. These properties included both purchased lands and buildings, as well as property acquired by way of inheritance.

Amores contended that except for two residential houses, the other properties were acquired with her personal funds or inherited, and thus should be considered her paraphernal properties. The Regional Trial Court (RTC) ruled in favor of Amores, declaring the contested properties as her paraphernal properties and denied Beumer's claims for reimbursement based on the constitutional prohibition against foreign ownership of Philippine lands. Beumer appealed to the Court of Appeals (CA), which affirmed the RTC's decision. Unsatisfied, Beumer elevated the case to the Philippine Supreme Court under a Petition for Review on Certiorari.

### Issues:

1. Whether the foreign national petitioner can claim a right to reimbursement for the real properties purchased during his marriage to a Filipino citizen, notwithstanding the constitutional prohibition on foreign land ownership in the Philippines.
2. Whether the doctrine of unjust enrichment applies in the context of foreign nationals purchasing land in violation of the Philippine Constitution.

### Court's Decision:

The Supreme Court denied Beumer's petition, affirming the CA and RTC's decisions. The court emphasized the constitutional prohibition against foreign ownership of land, except through hereditary succession. It ruled that Beumer, being aware of this prohibition, could not seek equity for reimbursement of funds used to purchase the properties. The Muller ruling was applied, which established that foreigners cannot claim reimbursement on grounds of equity for properties bought knowing the constitutional limitations. The court reasoned that Beumer's attempts at acquiring properties, despite understanding such limitations, constituted inequitable conduct barring him from seeking equitable remedies.

Moreover, the principle of unjust enrichment was deemed inapplicable as it could not override constitutional prescriptions.

**### Doctrine:**

This case reaffirms the principle that foreigners are prohibited from owning lands in the Philippines, barring cases of hereditary succession. It also outlines the limits of claiming equity and unjust enrichment in situations where the underlying transactions violate constitutional provisions or public policy. Equity cannot be invoked to circumvent constitutional bans or to sanction indirect violations of the law.

**### Class Notes:**

- **\*\*Foreign Ownership in the Philippines\*\***: Non-Filipinos are generally barred from owning land in the Philippines, as outlined in Section 7, Article XII of the 1987 Philippine Constitution.
- **\*\*Doctrine of Unjust Enrichment\*\***: Cannot override the Constitution or applicable laws. Requires a lawful basis for claims of recovery.
- **\*\*Equitable Doctrines\*\***: Equity follows the law. A claimant must come to court with clean hands to seek equitable relief. Attempts to circumvent legal prohibitions through equitable claims are not entertained.

**### Historical Background:**

The prohibition on foreign land ownership in the Philippines is rooted in the desire to preserve the nation's patrimony. This case highlights the judiciary's role in reinforcing constitutional directives and ensuring that foreign nationals cannot bypass these restrictions through indirect means or legal maneuvering.