

Title:

Alfonso vs. Office of the President and Phil-ville Development and Housing Corporation

Facts:

The controversy began with the irregular issuance of several Transfer Certificates of Title (TCTs) from Original Certificate of Title (OCT) No. 994, leading to differences in the date of registration, either as May 3, 1917, or April 19, 1917. OCT No. 994 covers part of the vast Maysilo estate. Yolanda O. Alfonso, the then Caloocan City Register of Deeds, was found administratively liable for altering the registration date of OCT No. 994 and was dismissed from service for grave misconduct and dishonesty. The case progressed through administrative and judicial reviews, including the Land Registration Authority (LRA), the Department of Justice (DOJ), the Office of the President (OP), and finally the Court of Appeals (CA), which all affirmed the dismissal. Alfonso then filed a petition for review on certiorari with the Supreme Court.

Issues:

1. Whether Alfonso violated the right to due process.
2. The propriety of the order of her dismissal.
3. The applicability of the doctrines of substantial evidence and administrative liability.

Court's Decision:

The Supreme Court denied the petition, affirming CA's decision. It found:

1. Alfonso was afforded due process during administrative and judicial proceedings.
2. The dismissal was based on substantial evidence of grave misconduct and dishonesty in failing to correct or question the irregularly altered date of OCT No. 994 and for issuing TCTs with conflicting dates.
3. Her administrative actions significantly impacted the integrity of the Torrens system and were directly related to her official functions, thus amounting to serious misconduct and dishonesty.

Doctrine:

The Supreme Court reiterated the principle that administrative proceedings require only substantial evidence for findings of guilt. It also emphasized that heads of offices must exercise due diligence and cannot blindly rely on subordinates, especially in the face of evident irregularities.

Class Notes:

- **Substantial Evidence**: In administrative cases, this refers to relevant evidence that a reasonable mind might accept as adequate to support a conclusion.
- **Administrative Liability for Grave Misconduct and Dishonesty**: Actions by government officials that significantly breach the trust of public service and/or involve the distortion of truth related to their duties.
- **Due Process in Administrative Proceedings**: Includes the right to explain one's side or seek reconsideration of the action or ruling complained of.
- **Sections of P.D. No. 1529 Relevant**: Sections 50 and 58, requiring submission of approved subdivision plans for registration of land, and Section 108, covering amendments and alterations of certificates.
- **Doctrine of Arias vs. Sandiganbayan**: Not applicable when foreknowledge of irregularity is evident, requiring higher scrutiny by officials.

Historical Background:

The controversy around OCT No. 994 of the Maysilo estate stands as a notorious example of land titling disputes in the Philippines, exposing weaknesses in the administrative oversight of land registration and the vulnerability of the Torrens system to fraud and misconduct. This case underlines the need for vigilance and integrity within government services dealing with land titles.