

Title:

****Republic of the Philippines v. T.A.N. Properties, Inc.: A Case Analysis on Land Registration Eligibility and the Doctrine of Alienable and Disposable Land****

Facts:

The case revolves around the application for original registration of title filed by T.A.N. Properties, Inc. (respondent) for a parcel of land in Batangas, Philippines. The Republic of the Philippines, represented by the Director of Lands (petitioner), opposed the application. The trial court, and subsequently the Court of Appeals, ruled in favor of the respondent, leading the case to be escalated to the Supreme Court.

The application involved Lot 10705-B, with an area of 56.4007 hectares. Notices of the hearing were duly published and posted. The Director of Lands filed an opposition, and one Ceferino Carandang later appeared as an oppositor but failed to file a written opposition and was defaulted. During the hearings, the respondent presented witnesses to establish the predecessors-in-interest's possession since 1942. Despite petitioner's appeal on the grounds of insufficient evidence of possession and the respondent's qualification to acquire the land, the Court of Appeals affirmed the trial court's decision.

Issues:

1. Whether the land is alienable and disposable.
2. Whether the respondent or its predecessors-in-interest had open, continuous, exclusive, and notorious possession and occupation of the land in the concept of an owner since June 1945 or earlier.
3. Whether a corporation is qualified to apply for registration of the land under the Public Land Act.

Court's Decision:

The Supreme Court ruled in favor of the petitioner, setting aside the decisions of the lower courts.

1. On the alienable and disposable nature of the land, the Court found that the certifications provided by the respondent, issued by Department of Environment and Natural Resources (DENR) officials, were not sufficient to prove that the land was alienable and disposable. The Court highlighted the lack of authority of the issuing officials and the discrepancy in the stated dates of land classification.
2. Regarding possession and occupation, the Supreme Court agreed with the petitioner that

the evidences, including testimonies and tax declarations presented by the respondent, were insufficient to prove the necessary quality of possession dating back to 12 June 1945 or earlier.

3. On the qualification of the corporation to apply for registration, based on the 1987 Constitution, the Supreme Court affirmed that private corporations are prohibited from acquiring any kind of alienable land of the public domain. The Court clarified that registration could only confirm a conversion to private land already effected by operation of law from the completion of the requisite period of possession, which was not established in this case.

Doctrine:

The Supreme Court reiterated essential doctrines:

- All lands not appearing clearly of private dominion presumably belong to the State, making it the applicant's burden to prove otherwise.
- A corporation cannot acquire alienable lands of the public domain but may hold them through lease.
- The qualifications for alienable and disposable lands require incontrovertible evidence proving the DENR Secretary's approval of the land classification.

Class Notes:

1. ****Presumption of State Ownership:**** All lands of the public domain are presumed to belong to the State unless proven otherwise by the applicant through clear evidence.
2. ****Alienable and Disposable Land Proof:**** The applicant must present substantial evidence that the land has been classified as alienable and disposable by the DENR Secretary, including the official release of the land from the public domain and a verified survey.
3. ****Corporation's Ineligibility to Acquire Public Lands:**** Pursuant to the 1987 Constitution, private corporations are barred from acquiring lands of the public domain, which can only hold such lands through lease.

Historical Background:

The case underlines the stringent requirements set forth by Philippine law and the Constitution regarding the registration of land titles, particularly those classified as alienable and disposable by the government. It accentuates the prohibition against corporations from owning lands of the public domain, a rule aimed at preventing large landholdings by corporations and ensuring land remains accessible to Filipino individuals.