

Title:

Aurellano Agnes et al. vs. Republic of the Philippines

Facts:

Calautit Island, located in Palawan, Philippines, is a 3,600-hectare area part of the Calamianes Island group. The petitioners claim to be descendants of 250 families who originally settled in Calautit. They stated that their ancestors owned the land through either certified titles issued under Act No. 926 or imperfect titles acquired through continuous possession and cultivation until their relocation in 1977.

In 1973, the Bureau of Lands started surveying Calautit for titling purposes but later informed the settlers that their lands would be converted into a zoo. Forcedly relocated under duress and threats from the Philippine Constabulary, the settlers moved to Halsey and Burabod in Culion in exchange for property agreements entailed in Resettlement Agreements.

In 1976, President Marcos issued Proclamation No. 1578 declaring Calautit a Game Preserve and Wildlife Sanctuary, leading to the settlers' forced relocation. The petitioners allege that the new resettlement areas were unfit for habitation contrary to governmental promises.

After the People Power Revolution in 1986, efforts to reclaim Calautit led to the formation of the "Balik Calautit Movement." Numerous complaints were lodged against the government's relocation orders, which eventually dismissed by Philippine courts on grounds of factual natures not appropriate for immediate certiorari.

In 1988, the petitioners filed a case with the RTC, Makati, which denied injunctive relief and dismissed the case without prejudice. This led to renewed complaints in RTC, Puerto Princesa where the government demanded possession back, landed settlers as "squatters". The RTC ruled for the government's favor.

The petitioners contested this decision to the Court of Appeals, which affirmed the RTC's ruling, maintaining Calautit as public domain land not subject to private ownership without explicit government declassification.

Issues:

The issues brought before the Supreme Court include:

1. ****Ownership Claims****: Whether the petitioners have valid claims of ownership of Calautit

in view of lacking a declaration of alienability.

2. **Proclamation Validity**: Whether Proclamation No. 1578 breached the petitioners' rights.
3. **Document Admissibility**: Are the resettlement agreements admissible despite deficiencies in notarization and witness testimonies?
4. **Validity of Resettlement Agreements**: Were the resettlement agreements procured by deceit, intimidation, or fraud?
5. **Material Breach Claims**: Did the government fail to fulfill its obligations in relocation making the agreements void?
6. **Dismissal for Mootness**: Does the issuance of a Certificate of Ancestral Domain Title (CADT) in 2008 affect the case's standing?

Court's Decision:

Ownership Claims: The Supreme Court upheld that the petitioners' claims of ownership were unsubstantiated due to the lack of appropriate government declassification rendering the land non-alienable and retaining it as part of the public domain.

Validity of Proclamation: The Court noted that Presidential Proclamation No. 1578 was within the state's rights to preserve and utilize land in public interest without conflicting with the petitioners' qualified claims.

Admissibility of Resettlement Agreements: The agreements, despite not being notarized, were deemed public documents as counterpart originals held publicly. These documents were considered sufficiently admissible even without the immediate authenticity claim.

Validity of Resettlement Agreements: The claims of fraud, deceit, and misrepresentation were ruled out, and the principle time bar due to the prescription period nullified potential claims. As such, the agreements were not voidable.

Material Breach Claims: The Court acknowledged inadequate government provisioning but stated petitioners' remedy was enforcement of proper compensation and facilities within resettlement areas rather than self-help measures of returning to Calauit.

Dismissal for Mootness: The subsequent issuance of CADT to the Tagbanua Indigenous Cultural Community nullified earlier need to adjudicate resettlement agreements by acknowledging ancestral domain rights, enabling petitioners' residency and development over former disputed territories.

Doctrine:

The Supreme Court reiterated public domain principles asserting that without explicit government declassification, presumed state ownership stands paramount. It emphasized that proper necessary judicial forums and time frames must be adhered to for contesting state actions and agreements.

Class Notes:

- **Public Land Ownership**: Lands not declassified by government act remain public domain even if settled or cultivated by private persons.
- **Resettlement Agreements**: Public documents can be un-notarized but accepted if counter originals are controlled by state authority.
- **Ancestral Domain Rights**: Republic Act No. 8371 protects indigenous peoples' continuous claim over lands held since time immemorial.
- **Justiciable Controversy**: Courts refrain from moot discussions when supervening events (like CADT issuance) obviate practical judicial reliefs.

Provisions:

- **Republic Act No. 8371**: Protects ancestral domains, allows Indigenous groups ownership and development rights over their traditional territories.
- **Proclamation No. 1578**: Enforces state right to declare wildlife sanctuaries overriding private settlements under certain conditions.

Historical Background:

The case traces roots to policies during President Marcos' regime focused on converting areas such as Calauit for state-directed wildlife conservation, forcefully relocating local inhabitants. This historical backdrop fuels ensuing legal conflict between state developmental priorities and individual subsidiary rights until democratic restoration slightly tips the balance back to favor displaced communities through new statutory protections in the 1990s.