

****Title:**** Republic of the Philippines vs. Rosita Sadca, et al.

****Facts:****

1. Sadca Acay applied for a free patent over a 28,099 sq. meter parcel in Abatan, Mankayan, Benguet under Free Patent Application No. (1-2) 1296.
2. On August 29, 1975, the Director of Lands approved the application and issued Free Patent No. (1-2) 120 and, consequently, Original Certificate of Title No. P-788 in Acay's name.
3. Acay passed away intestate on May 26, 1986. The lot was extrajudicially settled to his daughter Rosita Sadca.
4. Original Certificate of Title No. P-788 was cancelled and replaced by Transfer Certificate of Title No. T-22747 in Rosita's name on June 24, 1987.
5. Rosita subdivided the lot into 13 parcels and sold them to various buyers on April 30, 1990.
6. Nearly 27 years later, on August 26, 2002, the Republic filed a complaint, arguing the lot, part of Mount Data National Park and National Forest, was inalienable and involved fraudulent misrepresentations by Acay.
7. On March 20, 2012, the Regional Trial Court denied the complaint for lack of evidence of fraud.
8. The Republic appealed to the Court of Appeals, which affirmed the RTC's decision on May 26, 2015.
9. The Republic petitioned the Supreme Court for review, contending errors in the validation of the free patent based on alleged misrepresentations and the inalienability of the land.

****Issues:****

1. Whether the case falls within exceptions to Rule 45 petition allowing the Supreme Court to entertain questions of fact.
2. Whether the validity of the free patent awarded to Acay was properly upheld by the Court of Appeals, given the claims of inalienability and misrepresentations.

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

1. ****Exception to Rule 45:****
 - The Supreme Court determined the petition did not raise any special or important reasons warranting re-examination of factual questions, which are generally binding unless exceptional circumstances arise.
 - The Republic failed to cite any established exceptions for the Court to review the evidence.

2. **Validity of the Free Patent:**

- The Court upheld the Court of Appeals' affirmation of the RTC decision, finding that the Republic did not satisfactorily substantiate claims of fraud or misrepresentation.
- Section 48(c) of Commonwealth Act No. 141, as amended by RA 3872, allows members of indigenous communities to apply for and be awarded public lands—whether disposable or not—suitable for agriculture if they continuously occupied it for at least 30 years.
- Acay, a member of the Kankana-ey Tribe, met these legal requirements, and there was no significant evidence indicating fraud in his patent application.
- The Court found that Acay's free patent application was processed regularly and approved by the DENR, and the DENR's actions enjoyed a presumption of regularity in the absence of evidence proving otherwise.

Doctrine:

- Members of indigenous cultural communities can claim land within public domains—including non-disposable lands—under Section 48(c) of the Public Land Act, provided they have a continuous claim of ownership for at least 30 years.
- There is a presumption of regularity in the performance of duties by public officers unless proven otherwise by clear and convincing evidence.

Class Notes:

- **Concepts:**
 - **Native Title:** Recognizes ancestral land rights since before Spanish colonial rule.
 - **Acquisitive Prescription:** Ownership by continuous and uninterrupted possession for specific statutory periods.
 - **Public Land Act, Sec. 48(c):** Legal framework allowing indigenous ownership claims.
 - **Presumption of Regularity:** Presumes correct performance of official duties unless clear evidence suggests otherwise.
- **Key Statutes:**
 - **Commonwealth Act No. 141 (Public Land Act), Sec. 48(c):**
 - > Permits members of indigenous cultural communities to apply for land titles on public lands suitable for agriculture after 30 years of occupancy.
 - **Indigenous Peoples Rights Act (Republic Act No. 8371):**
 - > Recognizes ancestral lands and domains and the concept of native title.
- **Application:**
 - Courts will uphold administrative land grants unless clear evidence indicates irregularity.

- Claims to public lands by indigenous peoples are supported through continuous occupation and cultivation criteria.

****Historical Background:****

- The case highlights the Philippines' evolving land laws and the recognition of indigenous land rights.

- Historical emphasis on indigenous cultural communities' rights, starting from landmark cases like **Cariño v. Insular Government** (1909) establishing the native title concept, to RA 8371 institutionalizing indigenous land ownership rights in 1997.

- Reflects the constitutional and legislative efforts to balance state sovereignty over land with historical claims by indigenous peoples based on continuous and notorious possession.