

Title

Republic of the Philippines vs. Manuel M. Caraig

Facts

On September 2, 2002, Manuel Caraig, through his attorney-in-fact Nelson N. Guevarra, filed an Application for Original Registration of Title over a 40,000 square meter portion of Lot 5525, designated as Lot No. 5525-B, located in Brgy. San Luis, Sto. Tomas, Batangas. Manuel bought this property from Reynaldo S. Navarro, evidenced by a Deed of Absolute Sale dated September 25, 1989. Manuel and his predecessors allegedly held the land in continuous, peaceful, and exclusive possession since before June 12, 1945.

The Office of the Solicitor General (OSG) opposed on grounds that the property was inalienable and part of the public domain, and there was insufficient proof of possession dating back to 1945. Manuel's witnesses testified to his and his predecessors' possession. The MTC of Sto. Tomas granted the registration application on February 28, 2007. The OSG appealed, arguing that the evidence was hearsay and that the certificates provided were insufficient proof of the property's alienable status.

Issues

1. ****Whether CENRO Certificates are sufficient proofs that Lot No. 5525-B is alienable and disposable.****
2. ****Whether Manuel sufficiently proved continuous, peaceful, exclusive, and notorious possession of the land prior to June 12, 1945.****

Court's Decision

Issue 1: Sufficiency of CENRO Certificates

The Supreme Court held that certificates from the CENRO dated February 11, 2003, and March 21, 2003, sufficiently showed that Lot No. 5525-B was classified as disposable and alienable land as of December 31, 1925. These certificates were presumed regular and were not objected to by competent authorities like the DENR and LRA, despite the OSG's contention that additional proof was required under the rule established in *Republic v. T.A.N. Properties, Inc.* The Court applied the doctrine of substantial compliance and upheld the presumption of regularity in the absence of contradictory evidence, affirming the CA and MTC's decisions on this point.

Issue 2: Proof of Possession

The Court found that Manuel met the possession requirements under Section 14(1) of

Presidential Decree No. 1529 and Section 48(b) of the Public Land Act. Witness testimonies satisfactorily demonstrated that Manuel's predecessors, Evaristo Navarro and Reynaldo, were in continuous, open, exclusive, and notorious possession and occupation of Lot No. 5525 since before June 12, 1945. These testimonies were deemed credible and consistent, showing specific acts of ownership such as planting crops and construction of Manuel's house. Thus, Manuel's possession was linked with that of his predecessors, qualifying his claim under the law.

Doctrine

- ****Substantial Compliance****: CENRO certificates can suffice to prove a land's status as alienable and disposable under substantial compliance when corroborated by a lack of effective opposition from relevant authorities.
- ****Continuous Possession****: To establish ownership, one must demonstrate possession and occupation in the concept of an owner, characterized by specific acts of dominion from June 12, 1945, or earlier.
- ****Presumption of Regularity****: Government-issued certificates or documents enjoy this presumption unless disputed by substantial opposing evidence.

Class Notes

- ****Eligibility for Land Registration****: (1) Land must be alienable and disposable public domain land; (2) Continuous, open, exclusive, and notorious possession since June 12, 1945, or earlier; (3) Bona fide claim of ownership.
- ****Key Cases****:
 - ****Republic v. T.A.N. Properties, Inc.****: Set strict requirements for proving land is alienable.
 - ****Republic v. Serrano & Vega****: Allowed substantial compliance as an exception.

Historical Background

The case arose within the backdrop of longstanding principles of the Regalian Doctrine under the Philippine Constitution, which states that all lands not demonstrably within private ownership are public domain lands. The doctrine necessitates strict proof of private claims over public lands, reflecting the government's tight control and regulation of land distribution and ownership to safeguard public interests and prevent illegal encroachment on public properties. This case also fits into the evolving judicial interpretation of the rigor needed in evidence presentation for land registration applications.