

Case Title:

****Republic of the Philippines vs. Tri-Plus Corporation****

Facts:

Tri-Plus Corporation, represented by its president Euclid C. Po, filed an Application for Registration of Title over two parcels of land in Barangay Tayud, Consolacion, Cebu, identified as Lots 1061 and 1062. The Municipal Trial Court (MTC) of Consolacion initially heard the case, in which Tri-Plus claimed ownership and continuous possession over the said properties for more than 30 years. The Republic of the Philippines, through the Office of the Solicitor General (OSG), opposed the application, arguing that neither Tri-Plus nor its predecessors had been in the open and continuous possession of the land since June 12, 1945. The Republic also contended that the subject parcels belonged to the public domain and were not subject to private ownership.

The MTC ruled in favor of Tri-Plus Corporation, declaring it the owner of the properties and directing the issuance of the decree of registration. The Republic appealed to the Court of Appeals (CA), which affirmed the MTC's decision. The Republic subsequently filed a petition for review on certiorari to the Supreme Court, raising three main issues.

Issues:

1. ****Jurisdictional Error due to Uncertainty of Land Identity****:
 - Whether the CA erred in affirming the MTC's jurisdiction despite ambiguity in the identity of Lot 1061.
2. ****Failure to Prove Alienability and Disposability****:
 - Whether Tri-Plus failed to demonstrate that the subject properties are alienable and disposable public lands.
3. ****Disqualification from Acquiring Public Domain Land****:
 - Whether Tri-Plus is disqualified from owning public domain lands.

Court's Decision:

****Issue 1: Land Identity and Jurisdiction****

- The Supreme Court ruled that the identity of Lot 1061 was sufficiently established through a blueprint copy and technical description approved by the Lands Management Services of the Department of Environment and Natural Resources (DENR). Despite a discrepancy in one boundary segment reported by the Land Registration Authority (LRA), this did not substantially affect the lot's identity to warrant jurisdictional issues. The MTC had already

rendered its decision before the LRA report, and thus had jurisdiction at the time of the decision.

****Issue 2: Proof of Alienability and Disposability****

- The Court found that Tri-Plus Corporation failed to provide the required proof that the subject properties were part of the alienable and disposable lands of the public domain. The notation on the survey plan did not suffice as incontrovertible evidence. There was no certification from the DENR or any other positive government act indicating that the lands were classified as alienable and disposable.

****Issue 3: Disqualification from Owning Public Domain Lands****

- Given the failure to prove that the lands were alienable and disposable, the properties remained part of the inalienable public domain. Thus, there was no basis to declare the lands as private property or to confirm an imperfect title in favor of Tri-Plus.

Doctrine:

- ****Proof of Alienability****:

The applicant must present incontrovertible evidence demonstrating the land is alienable and disposable, generally requiring clear governmental acts like a certification from the DENR, presidential proclamations, or similar administrative actions.

Class Notes:

- ****Key Elements for Land Registration****:

1. ****Alienable and Disposable Land****:

- Must be supported by clear government documentation or certification.

2. ****Possession Since June 12, 1945****:

- Continuous, notorious, exclusive, adverse possession must be established through credible evidence.

- ****Provision Citation****:

- Section 6 of Commonwealth Act No. 141: Public lands classification is executive prerogative; Regalian Doctrine—public lands presumed State-owned.

Historical Background:

- This case underscores the application of the Regalian doctrine, which holds that all lands belong to the State unless proven otherwise by established legal standards. This decision reflects ongoing efforts to clarify property rights and prevent fraudulent claims over public domain lands, reinforcing the importance of documentary evidence in registration

proceedings.