

Title:

Director of Lands Management Bureau vs. Court of Appeals and Aquilino L. Cariño, G.R. No. 113051

Facts:

On May 15, 1975, Aquilino Cariño filed a petition for registration of Lot No. 6, a parcel of sugar land in Barrio Sala, Cabuyao, Laguna, with an area of 43,614 square meters, at the Court of First Instance of Laguna. He claimed the land was initially owned by his mother, Teresa Lauchangco, who died in 1911, and later managed by him after the death of their father in 1934. In 1949, through extrajudicial partition, Cariño and his brother became co-owners, and in 1963, Cariño became the sole owner through another extrajudicial settlement.

The Land Investigator from the Bureau of Lands confirmed that the land was not reserved, conflicted, or claimed by anyone else. A hearing was held, with Cariño as the sole witness and the Director of Lands as the only oppositor. The Regional Trial Court of Laguna ruled in favor of Cariño, ordering the registration and confirmation of title on February 5, 1990.

The Director of Lands appealed to the Court of Appeals, which affirmed the RTC's decision on November 11, 1993. The Director filed a Petition for Review on Certiorari to the Supreme Court, challenging the sufficiency of evidence provided by Cariño to prove ownership and rebut the presumption that the land was part of the public domain.

Issues:

1. Did Cariño submit sufficient proof of his fee simple title or possession in the manner and for the duration required by law to justify confirmation of an imperfect title?
2. Did Cariño overcome the presumption that the land is part of the public domain and belongs to the Republic of the Philippines?

Court's Decision:

****First Issue: Proof of Fee Simple Title****

The Supreme Court ruled that Cariño did not submit adequate muniments of title. The laws required historical proofs such as a royal grant, special concession, *composicion con el estado*, or a title through purchase, or an *informacion posesoria*, none of which Cariño provided. The documentation essentially began from 1949, which was insufficient to establish fee simple title.

****Second Issue: Public Domain Status****

The Court emphasized that possession of public land, regardless of duration, does not confer ownership unless the possessor can prove possession under a bona fide claim for the requisite period. Cariño's possession (starting from 1949) did not meet the 30-year requirement preceding his application in 1975, thus failing to meet the standards for confirmation of title under Commonwealth Act No. 141, as amended.

The Supreme Court thus reversed the lower courts' decisions, holding that the lot in question remained part of the public domain under the jurisdiction of the Bureau of Lands Management.

Doctrine:

The Court reiterated that possession of public land, even for a long time, does not constitute ownership unless proven under the conditions prescribed by law. The principle upheld is that all lands that have not been acquired from the government either by purchase or by grant remain public domain. Courts must scrutinize with rigorous care any claim to private ownership of such lands, ensuring well-nigh incontrovertible evidence.

Class Notes:

- **Key Elements:**

1. **Muniments of Title:** Royal grants, *composicion con el estado*, title through purchase, or possessory information titles are necessary for ownership claims.
2. **Public Land:** Lands that are not alienated by the State remain part of the public domain.
3. **Continuous Possession:** Proof of open, continuous, exclusive, and notorious possession for at least 30 years is necessary for imperfect title claims.

- **Principles:**

- **Regalian Doctrine:** All lands of whatever classification belong to the State unless alienated lawfully.

- **Burden of Proof:** The petitioner must prove by clear and convincing evidence their right to ownership.

- **Statutory Provisions:**

- **Section 48(b), Commonwealth Act No. 141:** Requirements for the judicial confirmation of imperfect titles.

- **P.D. No. 1073:** Amended Section 48(b) to require possession since June 12, 1945, or earlier.

Historical Background:

The case reflects the rigorous standards imposed by Philippine law on the registration of lands presumed to be public domain. The doctrines and principles discussed trace their roots to colonial land policies and the Regalian Doctrine, which underscores the government's overarching authority over land resources to ensure sustained national stewardship and conservation in line with constitutional mandates regarding natural resources. This frames land registration processes within strict evaluative contexts to prevent unwarranted private claims over public resources.