

Title: Republic of the Philippines vs. Spouses Ildefonso Alejandre and Zenaida Ferrer Alejandre

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Facts

1. **Application Filing**: On July 18, 1991, Spouses Ildefonso and Zenaida Alejandre (the applicants) filed an application for registration of Lot No. 6487, a 256 square meter plot in Barrio Poblacion, Bangued, Abra under P.D. No. 1529 (Property Registration Decree). They claimed ownership through a Deed of Absolute Sale from Angustia Lizardo Taleon on June 20, 1990.
2. **Government's Initial Participation & LRA Reports**: On September 16, 1991, the Office of the Solicitor General (OSG) represented the Republic, and by November 12, 1991, the Land Registration Authority (LRA) reported discrepancies in the applicant's plan.
3. **Trial Court Proceedings**: The trial court issued an order of general default on January 30, 1992, allowing the applicants to present evidence. The Alejandres submitted a corrected plan on April 26, 1993.
4. **LRA's Supplementary Report**: Despite corrections, the LRA reported on August 20, 1993, that there were still discrepancies. After a December 10, 1997 order, the LRA's Final Report on April 15, 1998 corrected the discrepancies but noted a six square meter increase in the area.
5. **Republic's Opposition**: On June 1, 2000, the Republic opposed the application, arguing lack of open, continuous, exclusive, and notorious possession since June 12, 1945, inadequate muniment of title, and that the land was public domain.
6. **Trial Court Decision**: On March 31, 2006, the trial court granted the application, later amending on June 12, 2008 to increase the area to 262 sqm.
7. **Republic's Appeal & CA Ruling**: The Republic appealed the decision. The CA, on February 27, 2015, sustained the RTC's Amended Decision.
8. **Supreme Court Petition**: Aggrieved, the Republic filed a Petition for Review on Certiorari without seeking reconsideration.

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Issues

1. **Legal and Factual Misapplication**: Did the CA seriously misappreciate the facts and misapply the law?
2. **Land Classification**: Whether the applicants proved the land is alienable and disposable.
3. **Requirement of Open, Continuous, Exclusive, and Notorious Possession**: Applicability of this requirement when acquisition is via sale.
4. **Burden of Proof**: Did the applicants meet the burden of proving the land's status as alienable and disposable and overturn the presumption of public dominion?

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Court's Decision

Reversal of CA and RTC Decisions: The Supreme Court granted the Republic's Petition, reversing both the CA decision and the RTC's Amended Decision. It also dismissed the land registration application without prejudice.

1. **Misappreciation and Misapplication**: The CA erred in applying Section 14(4) of PD 1529 by not requiring proof of alienability and disposability typically mandated for land registration.
2. **Land Classification Proof**: The Alejandres failed to present incontrovertible evidence that the land was classified as alienable and disposable.
3. **Possession Requirement Irrelevance**: Although the CA stated open, continuous, exclusive, and notorious possession was irrelevant under Section 14(4), the classification of the land is crucial.
4. **Burden of Proof on Alienable Status**: The applicants did not present sufficient proof to overcome the presumption that lands are part of the public domain without a positive government act declaring them as alienable and disposable.

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Doctrine

Regalian Doctrine: Inalienable land of public domain cannot be privately appropriated unless reclassified by state authority as alienable and disposable. The burden to prove the land's alienable status lies on the applicant.

Section 14 of PD 1529: Covers applicants for land registration, focusing on proof of land classification and possession.

Presumption of Public Domain: All lands not proven to be private remain public domain under state ownership until shown otherwise.

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Class Notes

1. **Regalian Doctrine**: Under Article 419 of the Civil Code and Section 3, Article XII of the 1987 Constitution, presumes all lands belong to the state unless proven otherwise.

2. **Section 14, PD 1529**: Outlines who can apply for land registration, requiring detailed proof if claiming under alienable and disposable lands category.

3. **Burden of Proof**: Applicants must present incontrovertible evidence to overcome the presumption of public dominion, including specific government acts classifying land as alienable.

4. **Case References**:

- **Republic v. T.A.N. Properties, Inc.**: Emphasizes the presumption of state ownership and the burden of proof on applicants.

- **Civil Code Articles**:

- **Art. 420**: Defines properties of public dominion.

- **Art. 421 & 422**: Classify patrimonial property.

- **Art. 425**: Defines private ownership properties.

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Historical Background

The 1987 Constitution solidified state ownership of lands barring substantial proof of reclassification for private ownership, embodying the Regalian Doctrine. This case underpins the significance of accurately proving land status in property registration to

ensure compliance with constitutional mandates enshrining state ownership principles.