

### Title:

**\*\*Pedrito Salmorin vs. Dr. Pedro Zaldivar, G.R. No. 581 Phil. 531\*\***

### Facts:

1. **\*\*Initial Agreement (1989)\*\***:

- On July 15, 1989, Dr. Pedro Zaldivar, the legal possessor of Lot No. 7481-H in Mapatag, Hamtic, Antique, designated Pedrito Salmorin as the administrator of the lot with a monthly salary of ₱150 through a written agreement (Kasugtanan).

2. **\*\*Conflict Arises\*\***:

- Zaldivar accused Salmorin of non-compliance with the Kasugtanan as Salmorin allegedly failed to till the vacant areas of the lot. Consequently, Zaldivar terminated Salmorin's services and asked him to vacate the property.

3. **\*\*Legal Proceedings Initiated\*\***:

- Salmorin refused to leave the property, prompting Zaldivar to file an unlawful detainer complaint in the Municipal Circuit Trial Court (MCTC) of Tobias Fornier-Aniniy-Hamtic (Civil Case No. 229-H).

4. **\*\*MCTC Decision\*\***:

- Salmorin, in his defense, claimed a tenancy relationship existed between him and Zaldivar, which would make it an agrarian dispute. Upon review, the MCTC dismissed the case, citing lack of jurisdiction as it identified it as an agrarian dispute.

5. **\*\*Appeal to the RTC\*\***:

- Zaldivar appealed to the Regional Trial Court (RTC) of San Jose, Antique, which ruled in his favor. The RTC found no tenancy relationship, stating the essential elements of consent by the landowner and sharing of the harvest were absent. Consequently, the RTC reinstated Civil Case No. 229-H.

6. **\*\*Appeal to the CA\*\***:

- Salmorin appealed the RTC's decision to the Court of Appeals (CA), which affirmed the RTC's decision, maintaining that no tenancy relationship was established.

7. **\*\*Petition to the Supreme Court\*\***:

- Salmorin escalated the matter to the Supreme Court via a petition for review on certiorari under Rule 45, arguing the regular court's lack of jurisdiction and denying Zaldivar's right to possess the property.

### Issues:

1. **Jurisdiction**:

- Does the MCTC have jurisdiction over the unlawful detainer case even when Salmorin alleges the existence of a tenancy relationship?

2. **Existence of Tenancy Relationship**:

- Whether there exists a tenancy relationship between Salmorin and Zaldivar which would remove the case from the jurisdiction of the regular courts and confer it to the Department of Agrarian Reform Adjudication Board (DARAB).

### Court's Decision:

1. **Jurisdiction Determination**:

- The Supreme Court ruled that the MCTC indeed had jurisdiction over the unlawful detainer case. It emphasized that jurisdiction is determined by the material allegations in Zaldivar's complaint, which clearly pointed to an unlawful detainer case.

- The Court reiterated that mere allegations by the defendant of the existence of a tenancy relationship do not automatically divest the regular courts of jurisdiction unless such a relationship is proven.

2. **Tenancy Relationship**:

- The Supreme Court found no tenancy relationship between Zaldivar and Salmorin. It emphasized the need for substantial proof of all elements of tenancy: landowner and tenant relationship, agricultural land, landowner's consent, purpose of agricultural production, personal cultivation, and sharing of harvests.

- The Court confirmed the findings of the RTC and the CA that consent by the landowner and sharing of the harvest were absent.

- Certifications from the Barangay Agrarian Reform Committee claiming Salmorin as a tenant were deemed non-binding on the courts.

### Doctrine:

- **Jurisdiction Over Unlawful Detainer**:

- Jurisdiction over an unlawful detainer case follows the material allegations of the complaint and is vested in regular courts notwithstanding defenses that might indicate otherwise.

- **Elements of Tenancy Relationship**:

- All elements must be present to establish a tenancy relationship: (i) Parties are landowner and tenant, (ii) Land is agricultural, (iii) Landowner consents, (iv) Purpose is agricultural production, (v) Personal cultivation, and (vi) Sharing of harvests.

**Class Notes:**

- **Key Concepts**:

- **Unlawful Detainer**: Civil action to recover possession of property.

- **Jurisdiction**: Determined based on material allegations in the complaint, not defenses.

- **Tenancy Relationship**: Requires proof of six specific elements (Republic Act No. 3844).

- **Statutory Provisions**:

- **Republic Act No. 3844**: Outlaws agricultural share tenancy and establishes conditions for leasehold relationships.

- **DARAB Jurisdiction**: Covers agrarian disputes concerning rights and obligations over agricultural lands.

- **Doctrine Application**:

- Conclusions on jurisdiction depend primarily on the nature of allegations presented. Tenancy relationships require meticulous proof and cannot be presumed.

**Historical Background:**

- **Agrarian Reform Context**:

- The case illustrates tensions within the framework of agrarian reform law in the Philippines, primarily dealing with the Comprehensive Agrarian Reform Program (CARP) as laid out in various statutes including Republic Act No. 3844.

- The abolition of agricultural share tenancy and transformation to leasehold systems reflects significant policy shifts aiming at tenant protection and land reform.

The definitive resolution upholds the distinctions between legal frameworks for tenancy disputes and unlawful detainer, reinforcing systematic, proof-based adjudication in agrarian contexts.