

****Title:****

Zoila de Chavez, et al. v. Enrique Zobel and Court of Appeals

****Facts:****

Enrique Zobel, the registered owner of a parcel of land known as Hacienda Bigaa in Calatagan, Batangas, sought to eject his tenants, who were tilling small portions of the land, asserting the land was suited for mechanization under Republic Act No. 1199. The tenants, including Zoila de Chavez, Bartolome Dimaala, and several others, opposed the petition. They claimed the land was not suitable for mechanization and that Zobel's true intent was to use the land for pasture and sorghum cultivation.

The Court of Agrarian Relations dismissed Zobel's petition for ejectment, questioning Zobel's intent to mechanize and noting that mechanization was impractical during the rainy season. Zobel appealed to the Court of Appeals, which reversed the decision and granted the ejectment petition. The tenants then petitioned the Supreme Court for review of the Court of Appeals decision.

****Issues:****

1. Whether the Presidential Decree No. 27, which decreed the emancipation of tenants and transferred the ownership of land they till, should prevent the ejectment of the tenants.
2. Whether the findings of fact by the Court of Agrarian Relations, which were in favor of the tenants, are conclusive on the appellate court.

****Court's Decision:****

The Supreme Court ruled in favor of the tenants, reversing the Court of Appeals' decision and reinstating the dismissal of the ejectment actions by the Court of Agrarian Relations. The court reasoned that:

1. ****Presidential Decree No. 27****: The Presidential Decree No. 27, issued in October 1972 and incorporated as part of the law under the revised Constitution, mandates the emancipation of tenants and the transfer of ownership of land to them. The decree aims to eliminate feudal remnants and prevent social issues stemming from land tenancy. The Supreme Court held that ejecting the tenants would contradict this express mandate and fundamental policy goal. Consequently, the ejectment of the tenants was impermissible as it would subvert the constitutional objective of emancipating tenants and transferring land ownership to them.
2. ****Findings of Fact****: The Supreme Court stressed the principle that findings of fact by

the Court of Agrarian Relations, if supported by substantial evidence, are conclusive on appellate courts. This principle has been upheld in numerous cases since 1958. The reversal by the Court of Appeals was therefore unjustified since it contradicted established jurisprudence.

****Doctrine:****

1. ****Supremacy of Presidential Decree No. 27****: Tenant emancipation and land transfer decreed by Presidential Decree No. 27 are constitutional mandates that override contradictory statutory provisions or judicial decisions.
2. ****Conclusive Findings of Fact by Agrarian Courts****: The findings of fact by the Court of Agrarian Relations, when supported by substantial evidence, are binding and conclusive upon appellate review.

****Class Notes:****

- ****Tenancy and Emancipation****: Presidential Decree No. 27 mandates the emancipation of tenants and transfers ownership of land they till to them.
- ****Relevant Statute****: Presidential Decree No. 27
- ****Judicial Review Boundaries****: In agrarian cases, findings of fact by the Court of Agrarian Relations are conclusive unless unsupported by substantial evidence.
- ****Key Cases****: Atayde vs. De Guzman; De Miranda vs. Reyes

****Historical Background:****

The tenancy problem in the Philippines has deep historical roots, with notable patriots like José Rizal raising concerns as far back as the late 19th century. The problem became more pronounced in months like those of Central Luzon, where tenant farmers suffered significant social injustices. Post World War II insurgencies and social movements further underscored the urgency for agrarian reform. In response, the Marcos administration issued Presidential Decree No. 27 in 1972, during Martial Law, to address these longstanding issues by “emancipating tenant farmers from the bondage of the soil.”

This case underscores the evolution of agrarian reform laws in the Philippines and the judicial branch’s role in interpreting and enforcing these reforms in line with constitutional mandates.