

Title: Republic of the Philippines vs. Dominador Santua (G.R. No. 155060)

Facts: On February 16, 1999, Dominador Santua filed a petition with the Regional Trial Court (RTC) of Calapan, Oriental Mindoro, for the judicial reconstitution of Transfer Certificate of Title (TCT) No. T-22868 covering parcels of land totaling 3,306 square meters in Victoria, Oriental Mindoro. Santua alleged that the original copy of the TCT was destroyed by a fire on August 12, 1977, and the owner's duplicate was lost during an earthquake on November 15, 1994. There were no co-owner's, mortgagee's, or lessee's duplicates, nor any deeds pending registration that affected the property. Santua and his family purportedly possessed the property and were paying taxes on it. In support of the petition, Santua attached a tax declaration, survey plan, and technical description of each lot.

The RTC issued an order on February 25, 1999, for a hearing and publication in the Official Gazette, notifications to relevant parties including neighboring landowners, the Register of Deeds, and government officials. No opposition was filed, and the Clerk of Court received evidence for Santua, including tax declarations and technical descriptions, without further challenge. The RTC then granted the petition on December 15, 2000.

The Office of the Solicitor General appealed to the Court of Appeals (CA), which upheld the RTC's decision on September 23, 2002. The Republic then appealed to the Supreme Court, questioning whether tax declarations, technical descriptions, and lot plans sufficed for the reconstitution of the lost or destroyed certificates of title.

Issues: The Supreme Court was tasked to decide whether the evidence presented—tax declarations, survey plans, and technical descriptions—were valid and sufficient bases under Section 3(f) of Republic Act No. 26 to reconstitute the lost TCT No. T-22868.

Court's Decision: The Supreme Court overturned the CA's decision, determining that the documentary evidence provided by Santua was inadequate for reconstituting the title. It emphasized that documents used for such purposes must be credible and ideally be part of the official records of the Register of Deeds. The Court pointed out that tax declarations are self-serving documents for taxation and do not verify land ownership or title. Furthermore, a survey plan or technical description, especially when privately made, cannot establish the issuance of a TCT in favor of a supposed titleholder. The Court highlighted the danger of approving reconstitution petitions without rigorous scrutiny as it could be exploited for unlawful acquisition of Torrens titles. The petition was thus denied.

Doctrine: Reconstitution of land titles must be supported by credible and official documents, preferably those on file with the Register of Deeds or certified copies thereof. Tax declarations and private survey plans are insufficient without other corroborating documentary records meeting the standards of Section 3 of Republic Act No. 26.

Class Notes:

- Under Section 3 of Republic Act No. 26, valid bases for title reconstitution include the owner's duplicate, co-owner's/mortgagee's/lessee's duplicates, certified copies of lost titles, deeds of transfer, and documents filed in the Registry of Deeds.
- Reconstitution is not about determining ownership but about restoring the lost certificate.
- Tax declarations have limited probative value and are primarily for taxation purposes.
- Survey plans must accompany petitions but alone are not conclusive proof of title.

Historical Background: In the Philippines, the concept of reconstitution arises from the registration system where titles and deeds are recorded under the Torrens System, aiming to provide conclusive proof of ownership. Act No. 496 and its amendments, later embodied in the Land Registration Act, configured a system that strived to ensure the integrity and reliability of recorded land titles. Reconstitution proceedings like those in this case are remedial measures introduced to respond to cases of lost or destroyed titles due to natural or man-made events but are fraught with necessary strictness to prevent fraudulent applications.