

Title:

Republic of the Philippines v. Liberty D. Albios

Facts:

Liberty Albios, a Filipino, and Daniel Lee Fringer, an American citizen, were married on October 22, 2004. Albios filed for the nullity of her marriage in December 2006, arguing that their marriage was a sham and had been conducted to facilitate her acquisition of American citizenship. She claimed they separated immediately after the ceremony and never intended to fulfill marital obligations. Fringer did not participate in the proceedings, and the investigation to determine collusion between the parties was inconclusive due to their non-appearance. The Regional Trial Court (RTC) declared the marriage void from the outset, endorsing Albios's account that they contracted the marriage for convenience to obtain American citizenship, and that there was no payment made nor citizenship petition processed by Fringer.

Issues:

The primary legal question the Supreme Court was confronted with was whether a marriage, contracted solely for the purpose of acquiring American citizenship for a sum of money, is void ab initio on the ground of lack of consent.

Court's Decision:

The Supreme Court held against Albios, reversing the findings of both the RTC and the Court of Appeals (CA), which had both found the marriage to be void for lack of consent. The High Court established that consent was not lacking between Albios and Fringer as both parties freely entered into the marriage knowing the benefits and consequences of being bound by it. This intention to enter into a marriage, regardless of ulterior motives such as gaining citizenship, satisfies the consent requirement under the law. The Court further distinguished Albios's case from a "marriage in jest," emphasizing that there was an intention to bring about a valid marriage to fulfill their goal and that no existing law deems a marriage void for reasons other than those explicitly provided by law.

Doctrine:

The doctrine established in this case is that the validity of marriage consent is not affected by the motives or purpose behind the marriage, provided that the parties freely consented to the marriage and complied with all legal requisites, suggesting that the marital intent necessary for a valid marriage relates to the act of marrying itself, not the subsequent actions or intentions of the parties in their matrimonial life.

Historical Background:

The case demonstrates an aspect of marriage fraud commonly associated with immigration law, emphasizing how some individuals may attempt to use the institution of marriage to secure residency or citizenship advantages in another country. The case distinctly separates the concept of marriage validity in civil law from notions of marriage fraud as recognized within the context of immigration law, which typically focuses on the intention to evade immigration regulations. The historical evolution of these issues has seen varying positions taken by courts, particularly in the U.S., with some upholding the validity of marriages entered for specific purposes and others not. Albios's case stands as a reaffirmation of the Philippines' commitment to uphold the inviolability of marriage as prescribed by its Constitution and legal statutes.