

Title: Rosario D. Ado-an-Morimoto v. Yoshio Morimoto and the Republic of the Philippines

Facts:

Rosario D. Ado-an-Morimoto was introduced to Yoshio Morimoto with the intent of facilitating her acquisition of a Japanese visa through a simulated marriage. On December 5, 2007, they signed a blank marriage certificate at the Manila City Hall, guaranteed by the solemnizing officer that it would never be registered. That was Rosario's last encounter with Yoshio.

Upon attempting to secure a Certificate of No Marriage later on, Rosario discovered a registered Certificate of Marriage indicating she had married Yoshio. This marriage was falsely recorded to have been officiated by Reverend Roberto Espiritu and based on a nonexistent Marriage License No. 6120159 from San Juan Civil Registry.

Rosario filed a Petition for Declaration of Nullity of Marriage, maintaining that no actual marriage ceremony occurred, and there was no legitimate marriage license. Prior to trial, the Assistant City Prosecutor reported no collusion between Rosario and Yoshio. Rosario presented evidence, including the erroneously recorded Certificate of Marriage and certifications from civil registries confirming the absence of the registered marriage or the purported marriage license.

The Regional Trial Court denied Rosario's petition. The Court of Appeals affirmed this denial. Rosario then elevated her appeal to the Philippine Supreme Court.

Issues:

1. Whether there was genuine consent to enter into a marital union.
2. Whether an actual marriage ceremony took place.
3. Whether a valid marriage license was issued for the marriage.
4. The appropriateness of the Court's decision in guarding the sanctity of marriage versus acknowledging a sham marriage.

Court's Decision:

The Supreme Court ruled that Rosario's marriage to Yoshio was simulated and lacked both essential and formal requisites, thus being void ab initio. The Court established that a valid marriage must involve genuine consent, an actual marriage ceremony, and a legitimate marriage license. It was determined that Rosario and Yoshio had no true intention to become spouses, no marriage ceremony was conducted, and no marriage license was issued to them. The Court's ruling was based on the evidence presented, which included Rosario's

admission against interest and certifications from civil registry offices.

The Court emphasized the absurdity of recognizing a fraudulent marriage and the contradiction it poses to the notion of upholding marriage's sanctity. Hence, the Court of Appeals' decision and resolution were reversed, and Rosario's marriage was declared null and void ab initio.

Doctrine:

A simulated marriage lacking genuine intent by the parties to enter into marital relations is totally inexistent and void ab initio. The Court has the duty to recognize such a marriage as void to preserve the inviolability of the marriage institution.

Historical Background:

The case sheds light on the reality of sham marriages, often orchestrated to obtain certain benefits such as visas. It underlines the judiciary's role in safeguarding the integrity of marriage as a social institution against fraudulent schemes that could undermine its sanctity. Over time, the jurisprudence has consistently stressed the requirement for genuine consent, a marriage ceremony, and a marriage license as indispensable to the validity of marriage. Entering a marriage with a true intention to establish a life-long union is a core principle reflected in the Family Code of the Philippines.

By declaring the marriage null and void, the Court also reasserts the legal system's stance on not permitting marriages conceived through deceit and misrepresentation to stand, even at the cost of recognizing the petitioner's involvement in illegal activities such as falsification. This policy upholds the authenticity and seriousness of marital commitments and prevents the exploitation of marriage for ulterior motives.