

**\*\*Title:\*\*** Francis Luigi G. Santos v. Republic of the Philippines, et al.

**\*\*Facts:\*\***

Petitioner Francis Luigi G. Santos pursued a legal change of his surname from “Santos” to “Revilla” by filing a petition under Rule 103 of the Rules of Court. Born to Lovely Maria T. Guzman and Jose Marie Bautista, Jr. (also known as Ramon Bong Revilla, Jr.), Santos was acknowledged by his father, Bong Revilla, in 1996 but was adopted officially by Patrick Joseph P. Santos in 1999, changing his surname to “Santos”. The petitioner argued that changing his surname to “Revilla” would avoid confusion and formally associate him with his biological father, Bong Revilla. The case moved from the Regional Trial Court (RTC), which denied the petition, to the Court of Appeals (CA), which affirmed the RTC’s decision, eventually leading to the Supreme Court (SC).

**\*\*Issues:\*\***

1. Whether the Court of Appeals erred in holding that Rule 108, rather than Rule 103, applies to the case at hand, and
2. Whether the petitioner’s request to change his surname from “Santos” to “Revilla” should be granted.

**\*\*Court’s Decision:\*\***

The Supreme Court partially granted the petition, affirming that Rule 103 was the appropriate legal remedy availed by Santos. However, it agreed with both the CA and the RTC that Santos failed to present compelling reasons to justify the change of surname. The SC underscored the principle that a change of name is a privilege, not a right, subject to the court’s discretion and requiring clear, proper, and compelling reasons. It emphasized that adopting the surname “Revilla” would not avoid confusion but rather create it, given the existing legal ties and the fact that Santos had been legally known as “Santos” following his adoption. The Court finally denied the petition to change the petitioner’s surname.

**\*\*Doctrine:\*\***

A change of name under Rule 103 of the Rules of Court is a privilege, not a matter of right, and is subject to judicial discretion. Furthermore, adoption severs all legal ties between the biological parents and the adoptee, granting the adoptee the rights and obligations as a legitimate child of the adopter(s), including the use of the adopter’s surname.

**\*\*Class Notes:\*\***

- Rule 103 vs. Rule 108: Rule 103 pertains to the change of name and is a suitable

procedure for instances where an individual seeks to change his/her given name or surname for valid reasons. Rule 108 involves corrections or cancellations in the civil registry and is used for more substantial changes not covered under administrative corrections.

- Adoption under R.A. 8552: Adoption severs biological legal ties and establishes those rights and responsibilities between the adoptee and the adopter, including surnames.
- Change of Name: Pursuing a change of name is granted only for compelling reasons, such as avoiding confusion, rectifying embarrassing names, and correcting errors, but not for convenience or minor preferences.

**\*\*Historical Background:\*\***

This case demonstrates the intricacies of Philippine law regarding family rights, particularly the stringent requirements and justifications needed for changing one's name officially. It highlights the interaction between personal desires and the legal framework surrounding family relationships, identity, and the implications of adoption on one's legal status and surname.