

Title:

Leonila G. Santiago vs. People of the Philippines: A Case of Conviction for Bigamy

Facts:

Leonila G. Santiago married Nicanor F. Santos, who was already married to Estela Galang since June 2, 1974. Santiago's marriage to Santos took place on July 29, 1997, despite warnings from her relatives about Santos's existing responsibilities. Santiago was subsequently charged with bigamy. She pleaded not guilty, asserting she believed Santos was single and their marriage was void due to lack of a marriage license. The case was tried at the Regional Trial Court (RTC), where during the proceedings, it was disclosed that Santiago might have been aware of Santos's prior marriage. The RTC found Santiago guilty of bigamy, rejecting her defenses. Santiago appealed to the Court of Appeals (CA), which affirmed the RTC's decision. Santiago then filed a Petition for Review on Certiorari to the Supreme Court, raising issues about her knowledge of Santos's existing marriage and the validity of her own marriage with Santos.

Issues:

1. Whether Santiago's lack of knowledge of Santos's pre-existing marriage absolves her from the bigamy charge.
2. Whether the validity of the second marriage, being void due to the absence of a marriage license, affects the bigamy charge.

Court's Decision:

1. The Supreme Court found no reason to reverse the lower courts' factual findings regarding Santiago's knowledge of Santos's prior marriage. Both lower courts determined she was aware of Santos's first marriage, which made her eligible for the bigamy charge.
2. Regarding the second marriage's validity, the Supreme Court observed that Santiago and Santos falsely declared that they lived together for five years, exempting them from needing a marriage license. The Court held that Santiago could not exploit her involvement in securing a fraudulent marriage certificate to avoid a bigamy conviction.

Doctrine:

The Supreme Court reiterated the principle that for someone to be convicted of bigamy, the second marriage must possess all the essential requisites for validity except for the existence of a previous marriage. Furthermore, a person cannot escape criminal prosecution by basing their defense on an illegal act they participated in, notably in procuring a

fraudulent marriage certificate.

Class Notes:

- **Elements of Bigamy**: (a) The offender has been legally married. (b) The first marriage has not been legally dissolved. (c) The offender contracts a second marriage. (d) The second marriage has all the essential requisites for validity.
- **Knowledge of Previous Marriage**: For the second spouse to be charged as a co-accused in bigamy, they must have had knowledge of the previous undissolved marriage.
- **Marriage Essentials**: Marriage requires a license unless exempted, such as when a couple has lived together for at least five years, which was not the case for Santiago and Santos.

Historical Background:

The case of Leonila G. Santiago vs. People of the Philippines highlights the Philippine judiciary's stance on handling bigamy charges, especially in situations involving fraudulent marriage licenses. The case underscores the sanctity of marriage as a social institution and the legal system's intolerance for attempts to circumvent marital laws.