

****Title: Arthur Te vs. Court of Appeals and Liliana Choa****

****Facts:****

Arthur Te married Liliana Choa in a civil ceremony on September 14, 1988. Post-marriage, they did not cohabit but maintained regular meetings. After Choa gave birth on April 21, 1989, Te ceased visits. On May 20, 1990, while still married to Choa, Te married Julieta Santella. Choa, upon discovering the second marriage, filed a complaint in June 1990, leading to Te's indictment for bigamy on August 9, 1990, in Quezon City's RTC (Criminal Case No. Q-90-14409).

Parallely, in July 1990, Te sought to annul his marriage to Choa, citing coercion and Choa's alleged concealment of a pregnancy by another man. Additionally, Choa pursued Te and Santella's professional licenses' revocation with the Professional Regulation Commission (PRC) for immoral acts tied to the second marriage.

Te's appeals to suspend the bigamy and administrative proceedings during the annulment case were rejected by both judicial and administrative bodies. His petitions for certiorari with the Court of Appeals challenging these decisions were consolidated and dismissed, affirming the lower courts' and the PRC Board's decisions. Te's subsequent motion for reconsideration was also denied.

****Issues:****

1. Whether the pendency of a civil case for annulment poses a prejudicial question necessitating the suspension of criminal bigamy proceedings.
2. The propriety of denying Te's demurrer to evidence in the bigamy case.
3. Whether Judge Peralejo should have inhibited himself from the bigamy case due to alleged bias.

****Court's Decision:****

The Supreme Court denied Te's petition, holding:

1. The annulment case did not bear upon Te's criminal liability for bigamy since a marriage, even if voidable, is presumed valid until annulled. Hence, no prejudicial question existed to suspend the bigamy proceedings.
2. The denial of the demurrer to evidence was within the lower court's discretion, adequately based on the prima facie case established by the prosecution. The evidential threshold for a prima facie case does not equate to a conviction and allows the defense a chance to refute.

3. Judge Peralejo's refusal to inhibit himself was not proven to be gravely discretionary. The allegations of bias did not meet the stringent requirement of evidence necessary to mandate inhibition under the law.

****Doctrine:****

The Supreme Court elucidated on the notion of a prejudicial question, clarifying that it must impact the criminal case's outcome so significantly that it might determine the accused's guilt or innocence. Furthermore, the existence of a voidable marriage must be judicially declared to impact related legal proceedings, upholding the principle that marriages, even potentially voidable ones, are presumed valid until officially annulled.

****Class Notes:****

- Prejudicial Question: A legal concept indicating that a civil case's resolution is necessary before proceeding with a related criminal case due to the issues involved potentially affecting the latter's outcome.
- Demurrer to Evidence: A motion to dismiss a case on the basis that the evidence presented by the prosecution is insufficient. Its denial is typically within the trial court's discretion absent grave abuse.
- Judicial Inhibition: A judge's choice to recuse themselves from hearing a case due to potential bias or conflict of interest. This decision lies within the judge's discretion unless statutory grounds are met.
- Principle of Marriage Validity: Marriages are presumed valid until declared void by a competent court, regardless of any allegations of the marriage being void or voidable.

****Historical Background:****

This case underscores the dynamics between civil annulment proceedings and criminal bigamy charges within the Philippine legal framework, particularly in light of the Family Code provisions. It reaffirms the legal stance that the determination of a marriage's nullity must precede the contracting of a new marriage, a principle that guards against potential abuses of self-adjudication in matters of marital status and underscores the importance of judicial intervention in determining marital validity.