

Title

****Santos-Gantan v. Gantan, G.R. No. 210518 (2022)****

Facts

1. ****Background and Marriage****:

- Petitioner Bernardine S. Santos-Gantan and respondent John-Ross C. Gantan first met in 1999.
- They were next-door neighbors and knew each other long before their relationship started.
- They were married twice by civil rites: first on May 28, 2002, in Angeles City, and then on December 18, 2002, in Baguio City.
- At the time of marriage, petitioner was 32 years old, and respondent was 22 years old.
- They had no children or conjugal properties.

2. ****Marital Issues****:

- Petitioner observed that respondent had been irresponsible, irritable, and incapable of holding a steady job even before marriage.
- Respondent's behavior worsened after marriage: he was often violent, especially when intoxicated, engaged in infidelities, and verbally abused the petitioner, calling her derogatory names.
- Respondent left for Korea in 2006, where he had an affair that led to their separation upon his return.

3. ****Psychological Evaluation****:

- Petitioner sought assessment from Dr. Martha Johanna Dela Cruz, a clinical psychologist, who diagnosed respondent with "Axis II Anti-Social Personality Disorder."
- Dr. Dela Cruz's diagnosis was based on information gathered from petitioner and close associates, as respondent and his parents did not participate in the evaluation.

4. ****Initial Court Proceeding****:

- On March 23, 2010, petitioner filed for declaration of nullity of marriage under Article 36 of the Family Code.
- The Regional Trial Court Branch 73, Olongapo City, granted the petition on February 23, 2012, declaring the marriage void ab initio.

5. ****Office of the Solicitor General (OSG) Motion****:

- The OSG filed a motion for reconsideration, challenging the credibility of the clinical psychologist's report.

- The trial court denied the motion on October 2, 2012.

6. **Court of Appeals Ruling**:

- On June 29, 2015, the Court of Appeals reversed the trial court's decision, finding that the evidence was insufficient to prove respondent's psychological incapacity.

- Petitioner's Motion for Reconsideration was denied on June 3, 2016.

7. **Supreme Court Petition**:

- Petitioner asked the Supreme Court to reverse the Court of Appeals' decision and reinstate the trial court's declaration of nullity.

- The Supreme Court resolutely decided the case on the merits, without respondent's comment.

Issues

1. **Did the Court of Appeals err in reversing the trial court's decision granting the petition for nullity of marriage on the grounds of psychological incapacity?**

Court's Decision

1. **Reversal by the Court of Appeals**:

- The Supreme Court noted that the trial court's decision was based on sufficient credible evidence and expert testimony despite the lack of physical examination of the respondent by the psychologist.

2. **Examination and Assessment**:

- Dr. Dela Cruz's conclusion was sufficient even without respondent's direct participation. A psychological disorder such as Anti-Social Personality Disorder was evaluated based on firsthand accounts and close observations.

- The Supreme Court held that in cases involving claims of psychological incapacity, expert opinions should be given significant weight, and the absence of the personal examination does not nullify the physician's findings if there is enough substantiating evidence.

3. **Finding of Psychological Incapacity**:

- The Court found that the evidence showed respondent's psychological incapacity has substantial juridical antecedence, gravity, and incurability, crucial under Article 36 of the Family Code.

- The totality of evidence, including testimonies and the psychological report, demonstrated respondent's incapacity to uphold marital duties.

Doctrine

- **Totality of Evidence Rule**:
- Psychological incapacity can be established without the direct examination of the alleged incapacitated spouse if the totality of evidence sufficiently shows incapacity.
- The rule emphasizes a holistic assessment of behavioral patterns and reliance on expert testimony.

Class Notes

- **Key Concepts**:
- **Article 36, Family Code**: Recognizes psychological incapacity as grounds for nullity.
- **Criteria for Psychological Incapacity**:
- **Gravity** - Severe incapacity hindering marriage duties.
- **Juridical antecedence** - Pre-existing incapacity before marriage.
- **Incurability** - Permanent and persistent condition.
- **Importance of Expert Testimony**: Weight is given to psychiatrists' and psychologists' assessments even without direct examination of the incapacitated party.

Historical Background

- **Historical Context**:
- The case reflects the Philippine judiciary's application of psychological concepts to marriage nullity issues under Article 36 of the Family Code.
- Highlights the evolution from rigid requirements in examining incapacitated persons toward a more evidence-based and holistic approach.
- Trends in judicial decisions increasingly prioritize the protection of marriage's sanctity but acknowledge void marriages cannot be upheld.

Conclusion

- The Supreme Court reinstated the trial court's decision, declaring the marriage void ab initio based on substantial evidence of psychological incapacity.