

**\*\*Title:\*\*** Mata Arañes v. Occiano

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

Petitioner Mercedita Mata Arañes filed a Letter-Complaint dated May 23, 2001, against Judge Salvador M. Occiano charging him with Gross Ignorance of the Law. The case was triggered by the series of events that began when Judge Occiano solemnized her marriage to Dominador B. Orobia on February 17, 2000. This marriage took place without a marriage license and outside Judge Occiano's territorial jurisdiction, specifically in Nabua, Camarines Sur instead of Balatan, Camarines Sur, where he presided.

1. **\*\*February 15, 2000:\*\*** Juan Arroyo requested Judge Occiano to solemnize the marriage of petitioner and Orobia on February 17, 2000.
2. **\*\*February 17, 2000:\*\*** Judge Occiano was informed that Orobia, having suffered a stroke, could not travel to Balatan for the marriage ceremony. Judge Occiano agreed to solemnize the marriage in Nabua, outside his jurisdiction.
3. **\*\*Ceremony Day:\*\*** Judge Occiano discovered the absence of a marriage license and initially refused to proceed. However, due to the earnest pleas of the couple and concerns over Orobia's health, he went ahead with the ceremony.
4. **\*\*Post-Ceremony:\*\*** Judge Occiano warned the couple about the necessity of presenting the marriage license to validate the union, which never happened. Later, the petitioner sought assistance from Judge Occiano again for issuance of the marriage license, which the civil registrar denied due to Orobia not providing the death certificate of his previous spouse.

The case advanced to the Supreme Court after initial processing. The Office of the Chief Justice referred it to Acting Court Administrator Zenaida N. Elepaño, who required a comment from Judge Occiano. The Office of the Court Administrator's investigation ultimately led to Judge Occiano being found administratively liable.

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

1. Whether Judge Occiano committed gross ignorance of the law by solemnizing a marriage without a marriage license.
2. Whether Judge Occiano acted within his territorial jurisdiction when he solemnized the marriage at Nabua, Camarines Sur.
3. Whether the filing of an Affidavit of Desistance by petitioner absolves Judge Occiano from administrative liability.

**Court's Decision:**

1. **Solemnization Without Marriage License:**

- The Supreme Court ruled that Judge Occiano lacked authority under the law to solemnize the marriage without a marriage license, making his actions an instance of gross ignorance of the law. The Court reiterated the precedent that a marriage without a marriage license is void, as established in "People vs. Lara."

2. **Territorial Jurisdiction:**

- The Court agreed that solemnizing a marriage outside the judge's territorial jurisdiction (Balatan) constituted an irregularity that rendered Judge Occiano administratively liable. The Court referenced "Navarro vs. Domagtoy," which clarified that local judges cannot officiate weddings outside their jurisdiction.

3. **Affidavit of Desistance:**

- The Court held that the withdrawal of a complaint does not absolve the respondent from administrative liability, reflecting the principle that disciplinary actions involve public interest and the integrity of the judiciary, not merely private matters.

The Court imposed a fine of PHP 5,000.00 on Judge Occiano with a stern warning against repeating such offenses.

**Doctrine:**

- A marriage without a requisite marriage license is void, per "People vs. Lara."
- Judges must only perform their duties within their territorial jurisdiction; violating this subjects them to administrative liability ("Navarro vs. Domagtoy").
- An Affidavit of Desistance from a complainant does not negate administrative responsibility ("Sandoval vs. Manalo").

**Class Notes:**

1. **Authority of Judges:**

- **Statutory Provision:** B.P. 129 (Judiciary Reorganization Act of 1980)
- **Principle:** Judges' authority to solemnize marriages is geographically limited.

2. **Marriage Requirements:**

- **Statutory Requirement:** Marriage License (Article 3, Family Code of the Philippines)
- **Principle:** A marriage without a marriage license is void.

3. **Affidavit of Desistance:**

- **Principle:** Withdrawal of complaints does not affect the administration of justice and

public interest in disciplinary actions.

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

This case reflects the judiciary's enduring focus on procedural correctness and territorial jurisdiction, evolving from broader judicial reforms undertaken under B.P. 129. It emphasizes the judiciary's commitment to upholding statutory mandates governing marriage solemnization—a critical issue both in civil law administration and ethical judicial conduct. The case serves as a benchmark for the strict interpretations of judicial authority and administrative responsibility.