

Title:

****Janice Maristela-Cuan vs. Marcelino A. Cuan, Jr., and the Republic of the Philippines: Evaluating Psychological Incapacity as Ground for the Nullification of Marriage****

Facts:

Janice Maristela-Cuan petitioned the court to declare her marriage to Marcelino A. Cuan, Jr., null and void due to alleged psychological incapacity, under Article 36 of the Family Code of the Philippines. The relationship started in 1997, and after a two-month courtship, they got married. Janice testified about Marcelino's overprotective behavior and extreme jealousy, which escalated post-marriage. Despite being married, they never lived together under one roof nor consummated the marriage. Marcelino's jealousy further amplified, leading to physical violence. The last communication was in 1999 when Marcelino demanded Janice leave work early, which she refused.

Janette Velasco, Janice's college friend, corroborated the testimony, elaborating on Marcelino's unfounded jealousy and the couple's separate living situations. Clinical psychologist Nedy L. Tayag diagnosed Janice with Passive-Aggressive Personality Disorder and, based on records and testimonies, determined Marcelino to have Paranoid Personality Disorder with Narcissistic and Antisocial Features.

The trial court granted the petition, deeming both parties psychologically incapacitated. However, the Court of Appeals, prompted by the Republic's appeal represented by the Office of the Solicitor General (OSG), reversed the decision, contending that the evidence was insufficient to prove psychological incapacity, suggesting that the depicted behaviors could be immaturity, not a disordered personality.

Issues:

1. Whether the evidence presented suffices to establish psychological incapacity as a ground for nullifying the marriage under Article 36 of the Family Code.

Court's Decision:

The Supreme Court granted the petition, diverging from the Court of Appeals. It held solely Marcelino as psychologically incapacitated, inadmissible to fulfill marital duties. The decision was anchored on the recent reconfiguration of psychological incapacity in "Tan-Andal v. Andal," which does not strictly demand medical incapacity or expert testimony but emphasizes durable aspects of a person's personality that derail the fulfillment of marital obligations.

The Court evaluated Marcelino's actions through testimonies and expert opinions, despite him not undergoing a personal examination by Dr. Tayag. These assessments indicated a serious, enduring, and incurable incapacity to comply with basic marital obligations, rooting in his personality structure, corroborated by both direct observations and expert analysis.

Doctrine:

Psychological incapacity, as a ground for the nullification of marriage, involves clear acts of dysfunctionality due to psychic causes, detectable through personality structures incompatible with marital responsibilities. Medical or clinical diagnosis is not strictly required; expert testimonies, corroborated by direct observations, may suffice to establish incapacity.

Class Notes:

- **Psychological Incapacity**: Defined under Article 36 of the Family Code as an incapacity that must be psychological—not necessarily medical—in origin, precluding the fulfillment of essential marital obligations. It must be characterized as antecedent (existing before marriage), grave, and incurable.

- **Evidence in Psychological Incapacity Cases**: Requires clear and convincing proof, more than preponderance but less than beyond reasonable doubt. Testimonies of ordinary witnesses about behavior and personality traits, corroborated by expert analysis when available, can establish incapacity.

Historical Background:

The case reflects a significant interpretation of psychological incapacity in the Philippines' legal system towards marriage nullification. It demonstrates the evolving judicial attitude towards mental health and its implications on legal capacity in familial relations, following the precedent set by "Tan-Andal v. Andal," aligning with contemporary understandings of psychological conditions beyond strict medical diagnoses.