

**\*\*Title:\*\*** Meynardo L. Beltran vs. People of the Philippines and Hon. Judge Florentino Tuazon, Jr.

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

Meynardo L. Beltran and Charmaine E. Felix were married on June 16, 1973. After 24 years and four children, Beltran filed for the nullity of marriage based on psychological incapacity under Article 36 of the Family Code. Concurrently, Felix accused Beltran of living with another woman, Milagros Salting, filing a concubinage charge against them. Beltran, seeking to suspend the criminal proceedings, argued the pending annulment case posed a prejudicial question to the concubinage allegations. His motions in the Metropolitan Trial Court were denied, prompting a certiorari petition with the RTC of Makati City, which was also dismissed, leading to the Supreme Court review.

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

1. Whether the pendency of a civil case for the nullity of marriage based on psychological incapacity constitutes a prejudicial question that warrants the suspension of a criminal case for concubinage.
2. If a possible judgment of nullity of marriage could affect the outcome of a concubinage case.

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

The Court dismissed the petition, ruling the annulment case does not pose a prejudicial question to the concubinage charges. It clarified that a prejudicial question necessitates an issue in the civil action that is so closely related to the criminal action's issue, the resolution of which would dictate the latter's proceeding. The Court also underscored that any declaration of the nullity of marriage for grounds other than remarriage must be judged by competent courts and does not serve as a defense in concubinage.

**\*\*Doctrine:\*\***

The Supreme Court reiterated the principles surrounding prejudicial questions, emphasizing that for a civil case to suspend a criminal case, it must directly affect whether the criminal proceedings proceed. Additionally, it stressed that parties cannot unilaterally deem a marriage void; such determination must be made by competent courts.

**\*\*Class Notes:\*\***

- **Prejudicial Question:** A legal concept requiring (a) a civil case involving issues closely related to those in a criminal case, and (b) that the resolution of these issues determines the criminal case's progression or outcome.
- **Article 36 of the Family Code:** Grounds for the nullity of marriage based on psychological incapacity must be proven in court and is judged separately from allegations of concubinage.
- **Legal Doctrine:** Individuals cannot determine the nullity of their marriage without a judicial declaration; the existence of a marriage is presumed until a court rules otherwise.

**Historical Background:**

The *Beltran vs. People* case illuminates the Philippine judiciary's approach to intersecting civil and criminal issues, particularly relating to familial and matrimonial disputes. It underscores the judiciary's stance on preventing the misuse of ongoing civil proceedings to impede or delay criminal cases, maintaining the separation of jurisdiction and the criteria for a prejudicial question. This decision also reflects the legal system's protective measures around the sanctity of marriage, demanding rigorous court proceedings to declare a marriage void, even amidst allegations affecting marital fidelity.