

### Title: Rene Ronulo vs. People of the Philippines: An Analysis of an Illegal Marriage Ceremony

### Facts:

Joey Umadac and Claire Bingayen planned to marry on March 29, 2003, at the Sta. Rosa Catholic Parish Church, San Nicolas, Ilocos Norte. The wedding couldn't proceed due to the absence of a marriage license. The couple, along with their entourage, went to the Independent Church of Filipino Christians, seeking Fr. Rene Ronulo's assistance. Ronulo, informed about the lack of a marriage license, agreed to conduct a ceremony.

An information was filed against Ronulo for violation of Article 352 of the Revised Penal Code (RPC), as amended, accusing him of performing an illegal marriage ceremony. The Municipal Trial Court (MTC) Batac, Ilocos Norte, found Ronulo guilty, imposing a fine in accordance with Section 44 of Act No. 3613 (Marriage Law). The Regional Trial Court (RTC) echoed the MTC's decision, slightly altering the foundation of the fine to Section 39 of the Marriage Law. Further appeal saw the Court of Appeals (CA) affirming the RTC's decision.

### Issues:

1. Definition and legal bounds of an "illegal marriage ceremony" under Article 352 of the RPC.
2. The interplay between state regulations on marriage and the principle of separation of church and state.
3. The significance of criminal intent, or lack thereof, in the performance of the disputed ceremony.
4. Whether the absence of a criminal case against the couple for violation of Article 350 of the RPC affects Ronulo's liability.
5. The proper penalty under Article 352 of the RPC in conjunction with the Marriage Law.

### Court's Decision:

The Supreme Court denied the petition, affirming the CA's decision. It clarified that:

- A "marriage ceremony" requires no specific form but mandates the personal appearance of the contracting parties before a solemnizing officer, declaring they take each other as husband and wife in the presence of two legal age witnesses.
- Ronulo's act constituted an illegal marriage ceremony due to the absence of a marriage

license, signifying the disregard for the essential and formal requisites of marriage.

- The principle of separation of church and State does not exempt Ronulo's actions from being considered a marriage ceremony under the law.
- Criminal liability under Article 352 of the RPC, as amended, does not require a concurrent charge or conviction of the contracting parties under Article 350.
- The imposition of a P200.00 fine was correct, drawing from Section 44 of the Marriage Law, which is for violations not specifically penalized elsewhere in the Law or subsequent regulations.

### ### Doctrine:

This case reiterates that the performance of a marriage ceremony without compliance with the legal requirements constitutes an illegal act, punishable under Article 352 of the RPC, as amended, and that the State's regulation of marital union does not infringe on the principle of separation of church and state.

### ### Class Notes:

#### \*\*Key Elements:\*\*

- **Marriage Ceremony Requirements:** Personal appearance of the contracting parties before a solemnizing officer and declaration of taking each other as husband and wife in the presence of at least two witnesses of legal age (Family Code, Article 6).
- **Illegal Marriage Ceremony:** Performance of a marriage ceremony by an authorized solemnizing officer without adherence to the essential and formal requisites of marriage, specifically, a valid marriage license (Article 352 of the RPC, as amended).
- **Penalty for Violation:** Imposition of a fine in accordance with Section 44 of the Marriage Law for any violation not specifically penalized or of regulations to be subsequently promulgated.

#### \*\*Application:\*\*

- Conduct tantamount to a marriage ceremony, absent compliance with statutory requirements, incurs liability.
- The distinction between ecclesiastical blessings and legal marital obligations.
- The individual accountability of a solemnizing officer irrespective of action or inaction towards the contracting parties.

### ### Historical Background:

This case underscores the legal demarcation between religious or ceremonial expressions of unity and the legal institution of marriage governed by state law. It highlights the evolving nature of matrimonial law and the judiciary's role in balancing religious freedom with statutory mandates aimed at preserving the sanctity and legal integrity of marriage as a social institution.