

Title:

Alcazar v. Alcazar, G.R. No. 180896

Facts:

On 11 October 2000, Veronica Cabacungan Alcazar (petitioner) married Rey C. Alcazar (respondent) in a ceremony officiated by Rev. Augusto G. Pabustan at his residence. The couple lived together for five days in San Jose, Occidental Mindoro, then moved to Manila, where the respondent did not stay at the petitioner's residence.

On 23 October 2000, the respondent left for Riyadh, Saudi Arabia, to work as an upholsterer. While abroad, the respondent ceased to communicate with the petitioner despite her repeated attempts to contact him. About 1.5 years later, the petitioner learned from a co-teacher that the respondent had returned to the Philippines without informing her. The respondent resided with his parents in San Jose, Occidental Mindoro, and did not contact the petitioner.

On 22 August 2002, the petitioner filed a Complaint for the annulment of her marriage based on the respondent's physical incapacity to consummate the marriage and later argued psychological incapacity under Article 36 of the Family Code. The RTC investigated for collusion and found none, proceeding to trial.

During the RTC trial, the petitioner presented herself, her mother, and clinical psychologist Nedy L. Tayag. While Tayag diagnosed the respondent with Narcissistic Personality Disorder and declared him psychologically incapacitated, he had never examined the respondent personally.

On 9 June 2004, the RTC dismissed the petition, finding no psychological incapacity at the time of marriage. The petitioner appealed to the Court of Appeals, which affirmed the trial court's decision. Subsequently, the petitioner filed a Motion for Reconsideration which was denied, leading to a Petition for Review on Certiorari before the Supreme Court.

Issues:

1. Whether the RTC and the Court of Appeals erred in not recognizing the respondent's psychological incapacity.
2. Whether the Supreme Court should annul the marriage based on psychological incapacity under Article 36 of the Family Code.

Court's Decision:

1. **Psychological Incapacity Determination**

- The Supreme Court upheld the decisions of the RTC and the Court of Appeals, asserting that the psychological evaluation by Tayag lacked substantive proof of psychological incapacity at the time of marriage (judicial antecedence). Tayag's report was considered inadequate due to the lack of personal examination of the respondent and reliance solely on the petitioner's accounts.
- The evidence provided by the petitioner was insufficient to substantiate claims that the respondent's behavior was a manifestation of a severe psychological disorder.

2. **Lack of Ground for Annulment**

- The Supreme Court noted that the original Complaint filed by the petitioner was based on physical incapacity to consummate the marriage (Article 45[5] of the Family Code), which was undermined by her admission that consummation occurred.
- Additionally, abandoning the physical incapacity claim to argue psychological incapacity did not hold since no clinical, convincing evidence was provided as required under Article 36 of the Family Code.

3. **Sanctity of Marriage**

- The Court emphasized the state's protection of marriage, stressing that doubts should be resolved in favor of marital unity. The petitioner's evidence did not meet the standards established in prior jurisprudence for psychological incapacity.

Doctrine:

1. **Psychological Incapacity under Article 36** - Psychological incapacity must be proven to be grave, existing at the time of the marriage's celebration (juridical antecedence), and clinically or medically incurable.
2. **Expert Testimony Requirements** - Clinical findings must be based on personal evaluation and robustly support the incapacity to assume essential marital obligations.

Class Notes:

- **Article 36 of the Family Code**:
 - Psychological incapacity must be classified as severe, long-lasting, and incapacitating the person to assume marital roles.
 - The burden of proof lies on the plaintiff, and doubts favor the validity of the marriage.
 - Requires expert clinical or medical evidence to substantiate the condition during the marriage's inception.
 - Relevant legal statutes: Family Code of the Philippines, particularly Article 36 and its

interpretative guidelines from Republic v. Court of Appeals.

Historical Background:

In Philippine jurisprudence, the protection and sanctity of marriage are deeply enshrined. The high threshold set for nullifying marriages based on psychological incapacity is consistent with the state's emphasis on preserving the family unit. As introduced by the Family Code in 1988, Article 36 reflects a careful balance between recognizing severe psychological impairments and preventing a de facto divorce law. This case reinforces the robustness of marriage validity and the rigorous standards for claims about psychological incapacity.