

# The Invalidating Impact of Force and Fear on Marriage

Mary Jane Aririguzo

Catholic Institute of West Africa, Port Harcourt, Nigeria

Marriage, as a sacrament of communion and consecration of love, requires freely given consent, a principle underscored by Pope Francis.<sup>1</sup> This article examines the invalidating impact of force and fear on marriage, arguing that coercion undermines the essential element of consent, and can render marriage invalid. Analysing some pertinent canons and canonical jurisprudence (Can. 1103, 125 §§1-2), it highlights how fear and violence compromise freedom, vitiating the “handing over of oneself” intrinsic to a valid marriage. Exploring the Church’s teaching and jurisprudential praxis, the study aims to empower couples in exercising their freedom to choose life partners, affirming the dignity of marriage as a union of love.

*Keywords:* coercion, consent, fear, force, freedom, marriage, validity

## Introduction

Marriage comes about by the irrevocable matrimonial covenant between the spouses, by an act of the will by which a man and a woman mutually give and accept each other (Can. 1057 §2). The efficient cause, that is, “the consent of the parties, legitimately manifested between persons qualified by law, makes marriage; no human power is able to supply this consent” (Can. 1057 §1). Consent, as defined by Nwabude Emmanuel, is a free act of the will in which a person agrees to do, accept, or reject something. Therefore, matrimonial consent must be total or complete so that a person becomes fully responsible for his or her actions (Nwabude, 2008). A partial consent may invalidate marriage.

The Church has always considered the protection of the freedom of the parties in the celebration of marriage to be of utmost importance. As Can. 1087 §1 of the 1917 Code noted, “a marriage is invalid if entered into because of force or grave fear inflicted from without and unjustly, so that a person is compelled to choose marriage in order to be free from it”. Can. 1103 of the 1983 Code similarly states: “a marriage is invalid which was entered into by reason of force or of grave fear imposed from without, even if not purposely, from which the person has no escape other than by choosing marriage”. Since freedom is a requirement of natural law, the word “unjustly”, which was present in the 1917 Code, was omitted in the 1983 Code.

External force (Can. 125 §1) and grave fear unjustly inflicted (Can. 125 §2), also called moral violence, can render a marriage invalid if they compromise the person’s free consent (Cf. BenEzenwa, 2021, p. 80). This does not lead to nullity except when the law provides, as in Can. 1103. The 1983 Code Commission determined that nullity caused by force and fear is of natural law.<sup>2</sup> Juridical grounds like force and fear pertain to law and administration of justice, and their verification may lead to invalidity of an act.

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Mary Jane Aririguzo, Ph.D., IHM, Department of Canon Law, Catholic Institute of West Africa, Port Harcourt, Nigeria.

<sup>1</sup> General Audience in St. Peter’s Square at the Vatican City, April 2, 2014.

<sup>2</sup> Cf. *Communicationes*, Romae, 1987, 1, p. 149.

### The Pertinent Canon

Can. 1103: The Can. 1103 states of 1983 Code precisely states the invalidity of a marriage contracted out of fear.: “A marriage is invalid which was entered into by reason of force or of grave fear imposed from without, even if not purposely, from which the person has no escape other than by choosing marriage”. The words of this canon clearly state the values contained in them: Invalidating Force (*vis*) and Fear (*metus*).

#### Explanation of the Terms

**Force.** Force is literally defined as “the coercion (*coactio moralis*) which moves the will under the threat of an evil in such a way that the will, otherwise not about to consent, does, in order to avoid the evil, consent to the imposed action” (Wrenn, 1998, p. 163). When the above definition of force is applied to marriage, true consent which is the efficient cause of marriage is presumed to be present, *coacta voluntas manet semper voluntas*, yet, in this case, the marriage is invalid. This is because freedom is lacking in the exchange of the consent. The Second Vatican Council gives emphasis to the freedom necessary for the celebration of matrimony. The Council teaches that, in a forced marriage, the full freedom of a person to choose one’s own spouse, which is a basic human right, is not respected.<sup>3</sup>

The marriage covenant of the spouses excludes any external force, which when it is grave, impedes the free choice of the will and renders the consent invalid, since the consent should be given without any external force. As taught by Thomas Aquinas, “for marriage not every *voluntarium* or will act is sufficient, but a complete *voluntarium* is required” (*Suppl.*, 47, 3, ad 2).

About the freedom necessary for the expression of marital consent, Navarette noted that the dignity of the human person requires that one not be compelled to live in a marital union with a person one did not love, married solely to escape a grave evil. Freedom of conscience demands one be free to marry a person with whom one can achieve one’s supernatural end in communion of life and love. The right to marriage is a fundamental right, which must be exercised freely respecting the common good. It is injurious to compel or prevent exercise of this right (Navarette, 1979, p. 291; Cf. BenEzenwa, 2008, p. 29).

### Common Fear

Ulpiano defines Fear (*metus*) as “the trepidation of the mind caused by a present or future danger”.<sup>4</sup> Common fear, as explained by Hout, is “basically a removal of freedom”<sup>5</sup>. As such, it is the deprivation by an extrinsic agent of a fitting liberty. It is the intimidation which results from force (Wrenn, 1998, p. 163). Fear violates human dignity, and as such is subjective or within the one who suffers it<sup>6</sup>. This could be verified in circumstances where the subject involved is a teenager, gross immaturity, low intelligence, etc.

The fear that invalidates marriage must be grave, extrinsic, and causative, as stipulated by Can. 1103 and established by the *rotal jurisprudence*.

#### Grave

The fear that invalidates marriage must be grave. Wrenn referring to established *rotal jurisprudence* notes that the gravity may be either absolute or relative. Fear is *absolutely* grave when it arises from an evil which is

<sup>3</sup> Cf. *Gaudium et spes*, nn. 17, 26, 27, 29, 48, 52.

<sup>4</sup> D. 4, 2, 1, Ulpianus I, II ad Edictum.

<sup>5</sup> *Coram Huot*, 73, 571, n. 11.

<sup>6</sup> Cf. M. J. Aririguzo, *Conformitas sententiarum*, p. 209.

capable of compelling a well-balanced person to enter marriage against his or her will. Evils of this sort are threats of death, mutilation, imprisonment, exile, loss of great wealth and disinheritance. Lesser evils inflicted on more timid people can result in fear which is *relatively* grave but with objective gravity. If the gravity is a pure figment of one's imagination, the fear is not really extrinsic but intrinsic (Wrenn, 1998, p. 163).

The gravity of the fear is to be weighed not exclusively by the gravity of the threatened evil, but especially by the character and condition of the person who suffers the fear. Many things must be taken into consideration: age, sex, disposition, economic independence, and other such matters. This gravity is also measured by a person's reluctance or aversion, which has a threefold aspect:

- (a) *Aversio contra matrimonium*: ("I do not want to marry");
- (b) *Aversio contra personam*: ("I do want to marry, but not you");
- (c) *Aversio contra statutum tempus*: ("I want to marry and I want to marry you, but not now")<sup>7</sup>.

Evil threatened in order to extract matrimonial consent can be not only natural, such as, disinheritance, ejection from home, mutilation, death, etc, but also spiritual, namely, anger of God, eternal damnation, spiritual director, etc. Bruno explained that even though threats of supernatural order are intrinsically induced, when they are made in an extraordinary and public manner, they are to be regarded as inflicted from without. The situation becomes more serious when the person threatened is deeply religious and God-fearing.<sup>8</sup>

### Extrinsic

The invalidating fear must be extrinsic. This means that the fear must be imposed from outside. The fear which is intrinsic, that is, which results from mere autosuggestion or suspicion or moral or social obligation or from a scrupulous conscience does not invalidate marriage (Wrenn, 1998, p. 163). Again, fear which is caused by some other extra-human agent, such as, sickness, precarious economic situation or public infamy does not invalidate marriage.

Noteworthy is the fact that when there is the intervention of an intermediary, one must carefully ascertain whether he or she is advising the person of mere facts or of threats. If, for example, a doctor acts as a kind of intermediary in advising a woman that she is pregnant, the intervention of the doctor obviously does not make the fear extrinsic because it is not the doctor but the pregnancy which the woman fears. But if, on the other hand, it is the woman's brother, for example, who is advising her of the father's threats, then extrinsic fear is indeed present (Wrenn, 1998, p. 163).

A decision of May 5, 1984 noted that the external cause of fear should not only be extrinsic to the person threatened, but should also be free, that is, threats coming from a person. Therefore, fear arising from within the person by self-suggestion or vain imagination cannot vitiate consent.<sup>9</sup>

### Causative

It must be established that the invalidating fear is causative. This means that one must have been compelled to marry in order to free himself or herself from the force and fear. In other words, Marriage, must be the effect, of which the cause (the principal and determining cause) was fear, so that if the fear (the cause) were not present, marriage (the effect) would not take place. To invalidate a marriage then, fear ought not to be merely the occasion

<sup>7</sup> Cf. *coram* Lopez-Gallo, 23 May 1995, *ME* 121 (1996), 93-107.

<sup>8</sup> Cf. *coram* Bruno, Dec. 65 (1982), 72-85.

<sup>9</sup> Cf. *coram* Bruno, Dec. 75 (1989), 318-330.

of marriage (so that one marries *cum metu*—with fear) but the real cause (so that one marries *ob metum vel ex metu*—out of fear).

If there is another remedy to the threatened evil, besides the marriage, which remedy is not utilized, then it could be presumed that there was another cause for the marriage, that fear was not the real cause, and that the marriage was not contracted *ex metu*.

The force need not be inflicted *directly* on the subject for the purpose of extorting consent. It is sufficient that the force is present and *indirectly* causes the marriage. This is obtainable for instance, when the father or the mother of a pregnant woman threatens in anger, to kill the woman's lover, whereupon the lover offers to marry the woman. This principle was stated *implicitly* in the 1917 Code, and stated *explicitly* in the 1983 Code, by the phrase “even when inflicted unintentionally—*etiam haud consulto incussum*”<sup>10</sup>.

The words stated in 1917 Code and substantially in 1983 Code that: “the person is compelled to choose matrimony” do not indicate a compulsion to a particular marriage with a specific person but to marriage in general. If, therefore, a person is truly compelled to marry in order to avoid some evil, the marriage is invalid even if some other choice of spouses is offered. An instant could be cited in a case of January 23, 1957 decided before Mattioli. The Roman Rota declared a marriage invalid in which the force exerted on the woman to go through a civil ceremony was regarded as virtually lasting and influencing the religious marriage four years later (*coram* Mattioli, 49, 37).

The best criterion for judging whether a marriage was entered *ex metu* or not is the presence of aversion. This could mean a physical aversion for the person but need not always be; it suffices that there is an aversion to marrying this very person. This type of aversion obviously could exist simultaneously with liking the person as a friend since there is a vast difference between wanting the person as a friend and wanting him or her as a spouse. Unless there is some sign of this minimal type of aversion, the marriage must be considered valid.

The ordinary signs or symptoms of aversion are crying and complaining before marriage, sadness, and denial of the signs of affection, disappearance, or running away from home. The absence of such signs after marriage proves nothing since it is then presumed that one is making the best of a bad situation.

In cases where there are these signs, where there is aversion, fear is presumed. This is however only a presumption and not with a certainty which would invalidate marriage. Ultimately, both aversion and fear must be proven in a given case.

### Reverential Fear

Beside common fear, another form of fear which can invalidate marriage is the reverential fear. Reverential fear is defined as “the sense of a future evil which we fear from those in whose power we are” (D'Annibale, 1909, I, §138, n. 16). The Second Vatican Council categorically states:

it is the duty of parents and teachers to guide young people with prudent advice in the establishment of a family; their interest should make young people to listen to them eagerly; and they should beware of exercising any undue influence, directly or indirectly, to force them into marriage or compel them in their choice of a partner<sup>11</sup>.

Reverential fear concerns practically the intervention of parents, guardians, or superiors on the marriage of their children or subjects. When the extrinsic force exerting the influence is a parent, guardian, or some

<sup>10</sup> See *Communicationes*, Romae, 1983, II, p. 234.

<sup>11</sup> *Gaudium et spes*, n. 52.

superior, the question of reverential fear comes to play. Here there are bonds of blood, affection, gratitude, adoration, subjection, by reason of occupation or of work (Pellegrino, 1998, p. 308; Cf. Eboka, 2023, p. 109). The characteristic features of reverential fear are: that there be a dependent relationship according to which an inferior owes deference and respect to a superior (between parents and children, guardian and ward, worker and management, etc.); that there be a well-founded fear of provoking serious and lasting indignation of the superior if marriage is not accepted; and that the coercion is brought about by the latter by different means which give rise to a real state of oppression in the mind of the inferior, precisely as an inferior (Viladrich, 1993, pp. 697-698).

Obviously where the subject has a built-in respect, reverence, and obedience for the superior, he or she is especially fearful of offending the superior and most of all of arousing the superior's indignation. It is important to note that it is this indignation and not any concomitant threats of evil which is the specific object of reverential fear (Cf. Igwe et al., 2022, p. 218).

Therefore, if a son is threatened by his father with disinheritance, we have two evils which are exerting force—the indignation of the father and disinheritance. If the son marries to avoid indignation, he is marrying out of reverential fear. But if he marries to avoid disinheritance, he is marrying out of common fear (Cf. Lomotey, 2025, p. 6932). It is not always easy, to determine whether the disinheritance is the principal motive for marrying, a subsidiary motive or just a sign of the father's indignation but it is an important area to be investigated by the court.

However, if the offense of the inferior and the indignation of the superior are grave, either in itself or from circumstances, such as, altercations, quarrels, constant, and rude pleadings, an absolute command, etc., then grave fear would be resultant effect. That is, if indignation were or probably would be harsh or long lasting, it could easily be serious or grave coercion and could result in grave, invalidating fear.

This form of parental behaviour needs to be highlighted as is done by L. Wrenn (Wrenn, 1998, p. 163). It cannot be overstressed that this indignation is an abuse of authority and of the filial reverence offered by children and is a luxury in which no parent has a right to engage. However, parents have rights to assist their children in choosing a partner, that they can offer them advice and even warnings as long as it is parental. This is in any case quite different from inflicting fear of harsh and long lasting indignation on one's child (Cf. Mutabaruka et al., 2025, p. 1145; Ubelejit-Nte et al., 2023, p. 10).

Regarding the element of causality, it should be noted that, in the case of reverential fear, the real evil present is the parental indignation, not the actual content of concomitant threats. In the case then of a man who marries not to avoid the disinheritance but the indignation of the parent, the question to be asked is not whether there was another remedy to disinheritance but whether there was another remedy to indignation; nor whether, if he had not married, he could have avoided the disinheritance but whether, if he had not married, he could have avoided by any other means the indignation of his father.

It should be noted that if the force exerted on the subject is so grave that it would give rise to intimidation even in the non subject, then the resulting fear is not really reverential fear but common fear. Reverential fear and common fear differ in two ways: by reason of the object, that is, indignation versus something, and by reason of degree, that is, the amount likely to be exerted on a loved one versus the kind used on a well balanced person who owes no reverence (Wrenn, 1998, p. 166). Furthermore, Faltin distinguishes reverential fear from common fear: (a) a legal qualification, from which arises a special subjection to the person legitimately constituted in

authority, and (b) an affective qualification, from which arises, as from a cause, a bond of reverence towards those under whose power a person is placed.<sup>12</sup>

### The Nigerian Context

In a rotal decision of Serrano, the judge notes that local culture and socio-cultural context can have tremendous impact on the selection of one's partner. Often the family controls this choice. Sociological studies prove the hypothesis that the culture of a place favours such a custom, and children are often pressured to marry partners chosen by the parents. It is often not possible to refuse parental choice because of strong family ties.<sup>13</sup>

Bishop Hilary Okeke in his Pastoral letter, *Marriage and the Family in the Light of Faith*, throws light on the involvement of African/Nigerian families in the marriages of their sons and daughters. He notes that while Catholic marriage is viewed as an exchange of consent between the two persons, the traditional African marriage is an inter-family affair that comes into existence through rituals such as payment of bride-price or bride-wealth, or bridal gift or dowry (Okeke, 2014, p. 21). The Bishop notes:

It is clear that the consent is personal and not collective. However, the traditional practice of group (family) consent as well as the personal consent enriches marriage and places marriage as personal as well as societal responsibility. Thus, the individuals as well as their families have the responsibility to sustain the matrimonial union. (Okeke, 2014, p. 21)

Suffice it to say that the family helps the young man and the young woman do the traditional inquiry about the social status, biological, mental, and spiritual health, etc., of the family to which they hope to contract marriage (Cf. Nemati et al., 2022, p. 420). In this line, Bishop Hilary affirms:

Young people should be assisted to approach the question of marriage and the choice of life-long partner with faith. They need to (freely) choose life-partners that are naturally, personally, socially and spiritually disposed to live the Christian marriage faithfully, peacefully and joyfully. (Okeke, 2014, p. 57)

Even when marriages are arranged as happens at times in our Nigerian culture, when the matches originate with someone other than the future spouses, there could be a limit regarding the extent to which the prospective bride and groom themselves have a say in the person they want to marry. The traditional betrothal, which is known as *Introduction*, consists of the two persons who are to marry introducing one another or being introduced by a family member or even by a third party to the senior members of their respective families (Burke, 2004, p. 224).

### Proof of Force and Fear

With regards to the proof of a fearful consent, jurisprudence indicates a two-fold method: the *direct* argument; the argument that looks to the presence of the force itself, and the *indirect* argument; namely the argument from the aversion of the party to the other person, or at least to contracting marriage with that person (Wrenn, 2002, p. 79). The judge needs to evaluate the existence of the double proof of invalidating fear: aversion (indirect argument) which refers to the person that suffers the fear, and coercion (direct argument) which refers to the person that inflicts such fear. This is to say that coercion and aversion have to be proven in the case.

In a decision of December 30, 1971, Pompedda illustrates the elements which can constitute violence. He notes that there must be present an extremely powerful and oppressive force, which compels and acts on a person against his or her natural and free inclination, one that is of such great impetus that it cannot be repelled. He

<sup>12</sup> *Coram Faltin*, 6 July 1994, *ME* 120 (1995), 207-222.

<sup>13</sup> Cf. *coram* Serrano, Dec. 65 (1982), 189-198.

highlights that this force must proceed from the free will of some other person in such a way that there exist two competing wills; one of the subject who is suffering and resisting the force, and the other of the subject who is inflicting the force. Meanwhile, the goal of the inflictor must look to the person, and that person, must, of course, be aware of the external influence. Thus,

in order for a marriage to be regarded as, and actually be invalid, it is necessary that a force be inflicted on at least one of the contractants; that, however, is not enough, since it is further required that there be a relationship of causality between the force and the consent. It is not sufficient, in other words, that the force be merely concomitant with the marriage; rather the marriage must be the effect of the force.<sup>14</sup>

In developing the arguments, tribunals look to the declarations of the parties and the testimony of the witnesses, to all the circumstantial evidence (the age, sex, character, temperament and condition of the person being forced, relationship to the person exerting the coercion, etc.) and to the motive for the coercion. The truth of the allegation must be obtained with moral certitude, *ex actis et probatis*, from the act and proofs (cf. Can. 1608). Pope John Paul II underscored the following in his allocution to the Rota of February 4, 1980:

The judge must draw this certainty from “ex actis et probatis”. First and foremost ex actis since it must be presumed that the documents are a source of truth ... Then ex probatis, because the judge cannot limit himself to giving credence to affirmations alone; on the contrary, he must keep in mind the possibility that, during the preliminary investigation, the objective truth may have been observed by shadows brought about by different causes, such as the forgetting of some facts, their subjective interpretation, carelessness and sometimes false representation and fraud. The judge must act with a critical sense. A difficult task, because there may be errors, while truth, on the contrary, is one only. (Woestman, 2002, p. 161)

### **Inferences From the legislation**

(a) Force and fear according to Can. 1103 militate against the natural law of freedom which is at the very foundation of the exchange of marital consent. It violates human dignity, and vitiates the matrimonial consent. Matrimonial consent does not exist when there is lack of minimum freedom necessary to contract marriage as required by natural law. Therefore, this law is applicable to the marriages of both Catholics and non-Catholics alike.

(b) The Second Vatican Council emphasized true freedom as a great sign of the divine image in human beings. The Council stressed the necessity of freedom from any coercion or force while one decides to marry. It stated that even though it is parents’ or guardians’ duty to offer prudent counsel to young people while establishing family, they are not to force them either directly or indirectly to marry or to choose a certain partner. Any unjust force or fear would violate seriously the natural right of a person and thereby cause the non existence of the act.

(c) Nigerian-African culture promotes filial-familial bond and extended family system. Most of the youths are economically and financially dependent on their parents, guardians, and superiors till they are employed. Often, the situation takes a toll on the liberty of the Nigerian youth to freely and responsibly make their marital choice independently.

(d) Statistics from Nigerian local tribunals show the high range (about 40%) of marriages which end up in breakups, constant fights, quarrels, even attempts of mutilation because the couples were forced into them.

(e) In order to validly contract marriage, marital consent must proceed from a free will. Only in true freedom can a young man and a young woman exchange their marital consent and be responsible for its fulfilment in joy and in sorrow, till death does them part.

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<sup>14</sup> Cf. *coram* Pompedda, 63 (1971), p. 1019, n. 2.

### Conclusions

By natural law everyone, who is capable, has the right to freely choose a partner with whom to contract marriage. Can. 1103 protects the right of the human person *from* remaining in a marriage into which he or she was coerced. However, in order to ascertain the invalidity of such a marriage celebrated out of force and fear, the existence of invalidating fear must be verified coming from the external force which eradicated the freedom of the party or parties to choose marriage.

In a typical Nigerian-African situation, where cultural considerations come into play, where the family's consent is very important, where arranged marriage is permissible, and the youth remain economically and financially dependent on the parents and the community till they are settled, the relationship factor between superior and subject, parent/guardian and child, take on an added degree of subservience, which brings with it unquestioning obedience. It goes without saying that the good will of the whole community should not militate against the freedom the youths most indispensably need in order to freely choose who to marry. It is only in responsible freedom that the couple can exchange marital consent and be able to consecrate themselves in love and establish a partnership of life.

### References

- BenEzenwa, H. (2008). *Force and Fear in Marriage Consent*. Nimo Nigeria: Rex Charles and Patrick.
- BenEzenwa, H. (2021) *Failed Marriages and Broken Homes in Our Time: Major Contributive Factors and Possible Remedies*. Awka Nigeria: Fab Anieh.
- Burke, J. (2014). *A dictionary of Canon Law*. Nairobi: St. Paul Commuincations/Daughters of St. Paul.
- D'Annibale, G. (1909). *Summula theologiae moralis I*. Romae: Ex Typographia Polyglotta S.C. de Propaganda Fide.
- Eboka, T. (2023). Child Marriage: The Resilience of the Nigerian Woman. In B. Orton (Ed.), *Gendered Perspectives of Restorative Justice, Violence and Resilience: An International Framework* (pp. 107-120). Emerald Publishing Limited.
- Igwe, C. P., Yusuf, O. B., & Fawole, O. I. (2022). Influence of financial strain on intimate partner violence and the moderating role of employment status among wives in Nigerian military homes. *Military Psychology*, 35(3), 215-222.
- Lomotey, J. N. A. A. (2025). Factors Affecting Marital Satisfaction and Relationship Quality Among Christians in Ghana. *International Journal of Social Science and Human Research*, 8(9), 6930-6937.
- Mutabaruka, F., & Hadijah, N. (2025). Domestic Violence a Threat to Marriage Institution in Sub-Saharan Africa: A Reflection on Some Cases in Rwenzori Region Western Uganda. *Advances in Applied Sociology*, 15, 1143-1156.
- Navarette, U. (1979). *Quaedam problemata actualia de matrimonio*. Romae: Editrice Pontificia Università Gregoriana.
- Nemati, M., Behmanesh, F., Kheirkhah, F., & Geraili, Z. (2022). Marital Commitment and Mental Health in Different Patterns of Mate Selection: A Comparison of Modern, Mixed, and Traditional Patterns. *Iran J Psychiatry*, 17(4), 418-27.
- Nwabude, E. (2008). *An encyclopaedic dictionary of Canon Law of the Western (CIC 1983) Church and Eastern (CCEO 1990) Churches*. Ibadan: Onitsha, Nigeria: Africana First Publishers Limited.
- Okeke, H. (2014). *Marriage and the family in the light of faith Pastoral letter*. Nnewi: Enugu, Nigeria: Snaap Press.
- Pellegrino, P. (1998). *Il consenso matrimoniale nel Codice di Diritto Canonico latino*. Torino: Giappichelli Editore.
- Ubelejit-Nte, A. A., & Nwakanma, E. (2023). Enduring Intimate Partner Violence in Marriage: Myths and realities. *International Journal of Sociology and Anthropology Research*, 9(1), 1-24.
- Viladrich, P. J. (1993). «Matrimonial Consent», in *Code of Canon Law annotated: Latin-English edition of the Code of Canon Law and English-language translation of the 5th Spanish language edition of the commentary prepared under the responsibility of the Institute*, Martín de Azpilcueta E. Caparros - M. Thériault, et al. (eds.), Montréal, 684-700.
- Woestman, W. H. (Ed.). (2002). *Papal allocutions to the Roman Rota 1939-2002*. Ottawa: St. Paul University Ottawa.
- Wrenn, L. (1998). *The invalid marriage*. Washington DC: Canon Law Society of America.
- Wrenn, L. (2002). *Judging invalidity*. Washington DC: Canon Law Society of America.