The Legal Regime of Cohabiting in Inheritance Law in the Republic of Albania

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Abstract

Cohabitation, being a social phenomenon, is evolving significantly in recent years, where in social aspects it is claimed that nothing can prevent a man and a woman, beyond marriage, to give life to astable relationship, thus realising a cohabitation that is known differently as more uxorious. The existential choice to give life to cohabitation and to the basic human rights is characterised by the seriousness of goals and sustainability. Social factors point out thatthere are many reasons that lead to cohabitation, among which canbe mentioned the avoidance of legal restrictions arising from marriage, the will to benefit from material goods or the avoidance of necessary requirements as happens in the crowning of marriage.However, even though it has evolved as a case, cohabitation still faces prejudices, especially in the religious aspect. In essence, menage de fait is an expression of the individual's freedom tochoose, and this is the reason why some foreign experiences tend towards the complete legal integration of de facto cohabitation withthat of marriage, especially in terms of property and inheritance, excluding adoption or fertilisation artificial. Based on the historicaland comparative analysis between the current legal framework in relation to that of other countries, this study focuses more on the interpretation of the legal vacuum of cohabitation, including the right of inheritance, the division of property and other consequencesin case division.

Keywords*: legal responsibility of cohabitants, cohabitation contract, parental responsibility, property division, judicial procedures.*

JEL Classification*:* K15, K36

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1. Introduction

The institution of cohabitation is extremely ancient, where man-woman unions are encountered since Paleolithic European hunters, but there is a lack of convincing, social and economic guesses about the nature of these unions, monogamous orpolygamous[2]. Aristotle said that man is a social animal, so he needs to live in a group and be with others, a phenomenon that has made it necessary to create some rules for coexistence. These rules, beforethey were legal, were social rules that were based on the belief thatat a given time, they were the most appropriate rules to ensure a coexistence between people and were based on the belief that their observance would ensure a coexistence as calmer and fairer. The family is at the core of society and the effective functioning of families creates an important basis for the well-being of society in general. This is one of the fundamental reasons that many international instruments and the Constitutions of most legal systems contain rules relating to marriage and the family. To understand the legal issues related to *de facto* cohabitation, one must first understand the relevant terminology, as it is handled in different ways in many states[3]. Cohabitation, referring to a personal relationship between two persons related de facto, is considered a registered cohabitation if it is based on a legal act madeby both parties and where the latter enter the legal regime willinglyand knowingly. The Constitution, as the fundamental law of a country, defines 'Everyone has the right to the inviolability of private and family life', referring to

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[2] Agim I. Tartari, (2015). *Bashkejetesa more uxori apo martesa e faktit neShqiperi.* Tirana, p. 75. For a comparative view see Lind, Göran, *Chapter 12 Common Law Marriage and Cohabitation Law*, in Lind, Göran, *Common Law Marriage: A Legal Institution for Cohabitation* (New York, 2008; online edn, Oxford Academic, 1 Jan. 2009), https://doi.org/10.1093/acprof:oso/9780195366815.003.0012, accessed 1 June 2024.

[3] Andra Olm, "Non marring cohabiting couples and their Constitutional rights to family life", *Juridica International*, xx, 2013, p. 106-8, https://www.juridicainternational.eu/public/pdf/ji_2013_1_104.pdf.

this, no one has the right to interfere in the private or family life of a person, except in cases where it is provided otherwise. The protection of these two rights (private and family) partially overlaps where both are part of the *forum internum* (personal life) related to the principles of freedom, human dignity and self-realisation. Since the recognition of family life as a constitutional value forces other instances to provide protection for families, to ensure the inviolability of family life, it isessential to define the forms of coexistence that are emphasized as family according to the Constitution. Cohabitation, having been considered a rare phenomenon around the '90s, was liberalized withthe great changes brought about by the transition, thus specifying most of the societies of Southeast Europe, and came as a result of the new generation which he seemed to disregard the moral rules and customs that say you can't live with someone before you've married them[4]. Until the '60s of the 20th century, cohabitation was not the subject of legal regulation in European countries, as its choice is the result of the free decision of people for whom the realization of happiness and personal satisfaction is a top priority, even though in the past, cohabitation in most cases was a step beforemarriage.

However, nowadays cohabitation is considered as the modern formof family where the number of couples living together has increasedeven in European countries. The traditional approach ofconsideringmarriage as the only officially recognized personal relationship changed in 1989, when Denmark became the first country in the world to give legal recognition to cohabiting couples thus creating anew institution.[5] In family law, the concept of unregistered extramarital union is accepted, this is due to the fact that cohabitation does not require any declaration in written or registered form before a competent body, and for its initiation, only the beginning of the joint life between the husband and the woman[6]. Since the cohabitation is not registered and a public document is not given for it *erga omnes*, therefore when it ends it is necessary to prove its duration in order to ensure judicial protection. However, the legislator has defined cohabitation only in two articles, leaving the solution to be based onthe rights and obligations according to the Civil Code. The legislator's determination to regulate the institution of cohabitation with legal norms was born from the need to resolve social relationsand behaviors from a legal point of view. If we look at it in terms ofcomparison with other European countries, it can be observed that several European legislations provides that for the validity of cohabitation there must be no marital obstacles.

In the Family Code of the Republic of Albania[7] the term 'cohabitation' is specified in two articles, namely: article 163, which gives the meaning of 'cohabitation' and article 164, which provides for the possibility of regulating parent-child legal consequences and property acquired during cohabitation.

1.1. Main objectives and the significance of the study

This study aims to bring out the study of legislation and judicial practice in Albania and the treatment of inheritance in the way it is arranged between them in the context of the family. Also, this studyaims to analyze in a comparative way the law and practices in relation to other countries in order to suggest further improvements. The focus of this study is important in several aspects:

- the cohabitation being as an institute that is little known or treated,I think that by offering an analysis of the current law it affects the building of legal knowledge in this field;
- the influence of the law and judicial practice in the context of cohabitation can influence the strengthening of the law and the identification of deficiencies regarding inheritance;
- improving the process of inheritance in the community by offeringexpansion of the law, new policies etc.

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[4] Emine Zendeli, Arta Selmani, Dejan Mickoviq, Angel Ristov. 2020. *Edrejta familjare.* Tetovo: Litera Group, p. 209, 210.
[5] Andra Olm, *op. cit.,* p. 105.
[6] Emine Zendeli, Arta Selmani, Dejan Mickoviq, Angel Ristov, *op. cit.*, p. 105.
[7] Center, Official Publishing. 2023, p. 25. Accessed January 20, 2024. https://www.drejtesia.gov.al/wp-content/uploads/2017/11/Kodi_Civill-2014_i_azhornuar-1.pdf.

1.2. Literature review

The focus of this study is the literature used in the legal treatment ofcohabitation in terms of inheritance, starting with the treatment of cohabitation in the time of ancient Rome treating the dimensions of cohabitation as a basic unit of social organization where Roman families were patriarchal and under paternal rule. However, cohabitation at that time varied from one period to another, reflecting historical changes. Treatment of the division of property obligations, after the separation of the cohabitants, as well as the partof the division of the inheritance in relation to other countries basedon a series of legal rules and practices in 'family' life. Inheritance sharing practices can reflect a society's cultural values and norms. In some cultures, inheritance is the same for all heirs, while in othercultures there may be differences in the treatment of inheritance based on gender, age, or social status.

Since in Albania there is a weak practice of judicial processes in thetreatment of cohabitation, courts are obliged to apply the law in cases of division of inheritance according to the provisions of the Civil Code. Judicial practices have an important role in ensuring a fair and equal process of sharing inheritance in cohabitation, protecting the rights of heirs and promoting stability and justice in society.

1.3. Methodology

The research methodology in this paper includes several important elements in the treatment of this institution:

- historical method being an important stage in identifying and analysing the primary and secondary sources of the institute of cohabitation, dealing with the evolution of this institute and the legislation that regulates it;
- comparative method where the legal framework and legal practices of different countries, mainly of European countries as theyhave a well-treated legislation, were compared to identify the possible solution;
- case study affects the handling of the solution of the cases in practice of the issues of division and benefit of the inheritance in this institute, seeing it in other practices as well.

1.4. Results and discussion

Starting from the analysis of the institute of cohabitation and its evolution up to the current Albanian legislation, several problems are noted that have to do with the insufficiency of the provisions ofthe Family Code to regulate it. In this legal vacuum, the role of Albanian judicial practice has also been sporadic. In fact, the judicialpractice so far has been limited to the recognition of the right of desired inheritance related to them with a wide spectrum of moral and property rights that can arise from cohabitation. Therefore, I think itwould be reasonable to start the process for the drafting of a speciallaw, with the aim of regulating the personal and property aspects between cohabitants in a couple[8].

2. The importance of the cohabitation contract

Albanian legislation determines that the family is formed on the basis of marriage between a man and a woman, a relationship whichin the legal literature is considered by the term 'legitimate family',since it is related according to the form required by the law. However, nothing prevents two partners from cohabiting without marrying under the terms of the Family Code, based on the analysis

[8] See some comparative points in Bowman, Cynthia Grant, *Legal Treatment of Cohabitation in the United States* (2004). Cornell Law Faculty Publications. Paper 148. http://scholarship.law.cornell.edu/facpub/148, available here: https://scholarship.law.cornell.edu/cgi/viewcontent.cgi?article=1147&context=facpub, accessed on 02.10.2024.

of many authors that the choice of cohabitation is freedom individual of the person.[9] The Family Code of the Republic of Albania defines cohabitation as 'a de facto union between a man and a woman who live as a couple characterised by a common life that has the character of stability and continuity'[10]. From this we can distinguish some characteristics of coexistence where:

- cohabitation is created between a man and a woman, whichmeans that in this direction it includes in a complex way the intertwined needs of each cohabitant, such as economic, social or in relation to the care of children;
- people who live together behave as spouses from the fact that it is created with their free will, agreeing to share rightsand obligations together during their joint life;
- cohabitation has a stable and continuous character, implyingnot only common life but also common interests, moral andmaterial assistance between the persons who live together and eventually the children resulting from cohabitation.

Article 164 of the Family Code has not provided for any legal consequences for persons who live together, considering it reasonable to regulate and protect the family derived from marriage, referring to this, the legislator has allowed the possibility for these persons to foresee by agreement the consequences that arise in the direction of children or property acquired during cohabitation. Referring to the practice of other countries, wecome to the conclusion that these disputes are regulated by agreements between cohabitants, where these contracts or agreements have proved useful as they precede the conflicts that arise later, usually in the period of its conclusion[11]. Although the Albanian legislation (Family Code) has foreseen the possibility of concluding an agreement between persons who live together, it mustbe said that the legal nature of these agreements is that of an atypicalcontract, therefore the legal regime will not find application in the code of to the family as it happens in the case of marriage but in theprovisions of the Civil Code on legal actions in general and the general principles of the law of obligations.[12] Also, on the other hand,it turns out that this contract is a formal contract which requires compliance with the rules according to the law for its drafting, i.e. in the form of a notarial deed, even though the doctrinal interpretations state that the contract or agreement is not necessarilylife in written form, it can be drawn up in writing by both cohabitantsand then certified by the notary, who must certify the compliance ofthe contract with legal rules as well as the transfer of real estate rights.

A cohabitation contract is a contract through which two unmarried cohabitants can arrange the financial aspects of their life as a couple. From this de facto thing we can understand that the requirements forconcluding such a contract where cohabitants must be unmarried and have an emotional connection.

The time to calculate the rights deriving from the cohabitation is 'In Roman law, the stable relationship between a man and a woman without the intention of marriage was considered as concubinage, which resulted in illegitimate children (*liberinaturales*)[13]. However, this 'cohabitation' was soon put to an end with the law of Augustus,which punished all types of relationships such which does not result in marriage

3. Cases of termination of cohabitation

With the marriage of cohabitants calculated from the day of signing the agreement at the notary and its registration is also presented with a joint declaration of both cohabitants and one of them, on the basis of which the effects of the cohabitation will cease. Cohabitation still today is not based on a legal act to recognize it, but we can say that its existence is importantin the formation of a legal notion by identifying it with relations which in terms of content are compared to the relations of spouses, but in difference based on satisfaction of emotional, ethical, creativeneeds between two

[9] Arta Mandro, *E drejta Romake*, third ed., Emal press, 2007, p. 193.
[10] Sonila Omari (2010). *E drejta familjare.* Tirana: Morava Press, p. 41, 42.
[11] Arta Mandro, *op. cit. (2007),* p. 193.
[12] Contracts that do not find a model in civil legislation are considered atypical contracts
[13] Emine Zendeli, Arta Selmani, Dejan Mickoviq, Angel Ristov, *op. cit*., p. 207.

non-crowned partners and family community.

Determination of the property regime in Cohabitation. The legal regulation of wealth is subject to frequent challenges resulting from changing social norms.[14] In general Western Europe nowadays is experiencing a decline in marriage and consequently an increase in divorces.[15] A minority of European countries allow cohabiting couples to register property agreements, as the regulation of property matters focuses more on married couples. In all countries of the European Union, except forjurisdictions based on common law (United Kingdom, Ireland, Malta) registration of cohabitation has an immediate effect on property aspects, unless the parties provide otherwise. The problempresented by Great Britain is from the fact that research has shown that many cohabiting couples believe that they have equal rights as married couples, the so-called 'common-law marriage myth' and this has led to the creation of a legal reform to combine it with the family law.[16] Cohabiting couples do not haverights regarding each other's property after separation. Since they donot have a legal scheme that offers legal remedies, cohabitants mustrely on the provisions of the Civil Code regarding the resolution of when the cohabitants will break the cohabitation between them by agreement or when one of them is separated from this cohabitation; with the death of one of the cohabitants, the same as with the dissolution of the marriage contractual disputes. Since they do not have a legal scheme that provides legal remedies, cohabitants must rely on the provisions of the Civil Code regarding the resolution of contractual disputes.[17] The division of the property regime, as it is in married couples, as well as in cohabiting partners, has its own jointand separate ownership. During cohabitation, cohabitants bringitems that they had before the formation of cohabitation as well as during it, or they acquire during the duration (gift, will).

The joint property of the cohabitants is the property acquired through work and other investments during its duration and is considered as such if their behavior shows that there is a will for theproperty acquired in that way to be shared[18]. The share of cohabitantsis proportional to the contribution they have given to its creation.[19] The administration and disposition by agreement of joint ownership consists of the tacit consent of one of the cohabitants forthe other to appear in the affairs of administration and disposition injoint ownership. Referring to this, we can say that none of the cohabitants has the right to dispose of or charge with legal work between the living his part of the joint property before it is divided between them, that is, the rule of the right of pre-emption in jointly owned items is followed. Cohabitants have the right to conclude a written agreement by which they share the administration of the joint property, in case the limits of administration are exceeded, the consent of one of the cohabitants given in the form of legal work isrequired. By means of this agreement, cohabitants can also agree that after the separation, determine the division of common items such as: divide the house into ideal parts depending on their contribution to its creation, in the absence of a reasonable solution.

The object of joint ownership of the cohabitants is movable and immovable items acquired during its duration; income from jointly owned items; items that serve for the exercise of the professional activity of cohabitants; money saved during cohabitation, etc.

The parties have the right to address the court, which will resolve theconflict by applying the rules of co-ownership in parts. [20]It must besaid that the burden of proof of the material contribution to the profitof the item will be made by the cohabitant who claims co-ownershipin part, according to the

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[14] Anne Barlow (2008). 'Cohabiting relationships, money and property: The legal backdrop', *The Journal of Socio-Economics*, 37(2), https://doi.org/10.1016/j.socec.2006.12.037, p. 503–504.

[15] Ibid, p. 504.

[16] Committee, Women and Equalities. 2022-23. *The rights of cohabiting partners*. Second Report of Session 2022–23: House of Commons Women and Equalities, https://committees.parliament.uk/.

[17] Emine Zendeli (2023). *Marrëdhëniet juridike-pasurore të bashkëshortëve,* Tetovo: UEJL, p. 269.

[18] For more details on the legal regime for such investments see Cristina-Elena Popa Tache (2020), „International investment protection in front of the states role in crisis times to managing disputes", *Juridical Tribune - Tribuna Juridica*, volume 10, issue 3, December, p. 455-465.

[19] Ibid., p. 271.

[20] Sonila Omari, *op. cit. (2010)*, p. 44: 'Persons who live together are deprived of a number of rights and obligations arising from marriage, among which they are': the right to a material contribution in favour of coexistence; obligation for alimony in favour of the partner who is not able to earn enough income to meet living needs; presumption of co-ownership of items acquired during cohabitation.

probatio incubit actor rule, as well as the proof of contribution must be made for each item in particular and not in relation to the totality of the items that have been acquired during cohabitation.

In the judicial decision *Jones v. Kernott* on the division of joint property the Supreme Court stated that when a property is joint, both parties' own rights toit regardless of the purpose for which the property was purchased inthe first place and that it was contributed to equal shares[21].

4. Determination of inheritance in cohabitation

As mentioned above in Albania, the concept of cohabitation in Law no. 9062 dated 08.05.2003 provided that: 'cohabitation is a de factounion between a man and a woman who live as a couple, characterised by a common life that represents stability and continuity'. But in addition to this, the law also provides in the otherprovision that 'persons living together can enter into an agreement before a notary, where they determine the consequences arising from cohabitation regarding children and property during cohabitation'.[22] It seems that the cohabitation morethan what is regulated by article 164 is done in order to avoid marriage according to positive law and on the other hand to guarantee the families for this union of facts. This type of cohabitation seems tout looks more like a type of 'marriage with proof or crown' recognized by Albanian customary law and it seemslike a typical situation of dressing the institutions of customary lawunder the guise of positive law. In addition, this is reinforced by thefact that the relationship between the couple is so fragile that coexistence between them ends due to quarrels. Cohabitation givesthe husband and wife a primary role in the family as they must takecare of each other to develop a warm and friendly relationship. Carefor the well-being of the family includes aspects of moral and material well-being which requires the contribution and care for ensuring a good standard of living. By referring to the provisions of the Family Code (n. 163-164), we come to understand that the Codeleaves the regulation of relationships arising from cohabitationentirely to the will of the parties, neglecting the legal consequencesthat this institution may bring to other civil relationships like that ofinheritance. The Civil Code in article 360 states that the right of inheritance is enjoyed only bythe surviving spouse, with whom the testator had a legal marriage. It must be said that the cohabitant, not enjoying the quality of the posthumous spouse, despite the years he has lived with him, does not enjoy the ability to inherit and therefore is not part of the circle of heirs, unless he fulfills the condition of being a dependent personof the other cohabitant[23]. The co-habitant is completely unprotected by the law in inheritance relations where, apart from not being provided for in the circle of legal heirs, he cannot even benefit fromtestamentary dispositions and in these conditions, cohabitants have no choice but to transfer the property through donation.

In Italy, with the establishment of the Cirinna law[24], itwas emphasized that cohabitants are not subject to inheritance either by will or as legal heirs, but it provided protection to cohabitants in relation to the house used as a family residence by guarantee the cohabitant the opportunity to continue living there for two years or in a period equal to the duration of the cohabitation[25].

5. Conclusions

Since the law that deals with inheritance does not include cohabiting partners in the categories of legal inheritance, I think it should be adjustedleaving room to propose legal reforms that better reflect the social realityin this aspect.

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[21] *Jones v. Kernott.* 2011. 2010/0130 (The Supreme Court, November 9): Supreme Court decision on property rights for unmarried couple, https://www.russell-cooke.co.uk/.

[22] Arta Mandro Balili (2014) 'Diskriminimi gjinor në çështjet familjare', April 2014, p. 95. Accessed January 20, 2024. https://www.undp.org/sites/g/files/zskgke326/files/migration/al/Diskriminimi-gjinor-ne-ceshtjet-familjare-A.-Mandro.pdf.

[23] Center, Official Publishing. 2023. Accessed January 20, 2024, https://www.drejtesia.gov.al/wp-content/uploads/2017/11/Kodi_Civill -2014_i_azhornuar-1.pdf.

[24] Cirinna Law 76/2016 recognized the cohabiting partners as de facto partners through a contract assigning them rights: to have access to medical aspects; to receive compensation if the partner dies in accidents; to visit the partner if he is imprisoned.

[25] Notario, Consiglio Nazionale del. n.d. Accessed January 20, 2024. https://notariato.it/en/famiglia/cohabitation/.

Cohabitation being a less regulated institution in many jurisdictions in terms of inheritance benefits excludes partners except in states which condition the duration of cohabitation giving similar rights to marriage, usually in couples who prove that they have lived for a long period together. Also, since it is regulated in only two articles, there is a lack of aclear legal regime for inheritance issues, bringing confusion and disagreement between the parties. The current inheritance law gives priority to relationships that have ended in marriage by including them both in the legal inheritance regime and also in the testamentary one and leaving room for interpretation in de facto couples, so I think that the development of a clear legal basis where it divides the rights and obligations in terms of inheritance, including the procedures and criteria for its assessment would facilitate the resolution of conflicts.

In terms of financial rights, couples can agree by means of a contract on the division of assets, which is signed before a notary and can also be automatically revoked upon the death of one of the partners or if one of them marries. The law specifies that even though the de facto partners enter into an agreement or contract on the division of property as far as matters of inheritance are concerned, it does not define a special legislation excluding them from this right.

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