

THE DIRECTOR OF LANDS, PETITIONER, VS. HONORABLE COURT OF APPEALS AND SALVADOR ZARTIGA, RESPONDENTS.

G.R. Nos. L-46068-69. September 30, 1982

Ponente: MAKASIAR, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/3a36982ed45c/>

MAKASIAR, J.:

Before US are three petitions for review on certiorari seeking the reversal of the Court of Appeals' decision dated January 6, 1977 in CA-G.R. Nos. 39514-R and 39515-R which affirmed with modification the decision of the Court of First Instance of Davao, Branch III in Civil Case No. 670 and Cadastral Case N-8, LRC Record No. N-95.

Petitioners in these cases question the legality of the claim of one person (deceased Salvador Zartiga who is substituted by his heirs) over nine [9] lots which practically embrace the townsite of Bansalan, Davao del Sur. These lots with a total area of 289.9920 hectares, more or less, and delineated as the Bansalan Public Lands Subdivision, Case No. 6, Cad. No. 275 (Ig - 1013), are Lots 2305, 2319, 2325, 2326, 2342, 2343, 2344, 2416 and 2417 [pp. 12 & 121, G.R. L-46648 rec., pp. 31 & 178, L-46068-69, rec.].

During the trial of Civil Case No. 670 in the lower court, about 10,000 people inhabited the poblacion of Bansalan; about 500 buildings worth more than P2 million particularly government buildings, schools, markets, commercial and residential structures, religious edifice, buildings housing charity organizations were already constructed. The municipal roads were also built at the time (pp. 10 & 121, L-46648; pp. 31 & 178, L-46068-69).

The statement of the case and the facts have been clearly and accurately consolidated by the Solicitor General in his brief for petitioner Director of Lands in G.R. No. L-46068-69. We thus quote:

"This case started in 1951 as a complaint for recovery of possession and damages filed by Salvador V. Zartiga in the Court of First Instance of Davao (Civil Case No. 670) against twenty-one [21] defendants. Private respondent claimed that by himself and his predecessors, he had been the absolute owner and possessor since time immemorial of the nine (9) lots declared under Tax Declaration No. 15722 and bounded as follows: North, Lot 2355, Singag Bagobo; East, Salvador Zartiga; South, Salvador Zartiga; and West, Miral River. He complained of some defendants who entered and occupied areas without his knowledge and consent, and refused to pay rentals; while others, who originally entered and occupied areas with his consent and agreed to pay rentals, later refused to pay. He thus prayed that defendants be ejected therefrom; that his possession be restored; and that he be paid damages (pp. 2-23, Record on Appeal).

"Defendants in answer denied the ownership and possession by private respondent of the nine (9) lots contending that 'the land in question is public land and has been such at all times; that neither the plaintiff nor his predecessors-in-interest had occupied the land since time immemorial' and private respondent 'does not occupy any of the lots claimed by him'. They also averred that they had no obligation to get the prior consent of the private respondent before occupying the public lands they possess nor to pay rentals, and pointed out that many persons, some of them mentioned in their answer, had filed public land applications over the lots claimed by private respondent (pp. 37-53 id.).

"Then on February 5, 1953, the Director of Lands intervened contending that the lots subject of Civil Case No. 670 'is public agricultural land, owned by the Government of the Republic of the Philippines and as such, claimed by the herein movant Director of Lands in representation of the Government and, as the administrator thereof, charged with its supervision, administration and disposition' (pp. 83-89, id.). The lower court granted the motion to intervene and admitted the answer in intervention (pp. 110-111 id.). Thereafter, the Director of Lands was directed by the lower court to institute compulsory registration proceedings (pp. 111-112) in view of private respondent's allegation in his complaint that the area claimed by him was the subject of a pre-war cadastral proceedings where the decision was appealed without resolution of said appeal, and the records were destroyed during the last war and had not been reconstituted (cf. p. 3, id.). In compliance therewith, the Director of Lands filed a petition for compulsory registration (pp. 112-127, id.). And in a claim dated July 10, 1954 (pp. 129-131, id.), the Director of Lands alleged, among others, that -

'The parcels of land described as Bansalan Public Lands Subdivision, Case No. 6, Sta. Cruz, Davao, which constitute the subject-matter of the case, are of the public domain on the ground that so far as he is aware, said parcels have not been acquired by any person either by composition title from the Spanish Government, by possessory information title, or by any other legal means to acquire public lands, and on the further ground that even conceding that said parcels were acquired by private persons, whatever rights or interests they might have had thereto or therein have been lost by prescription same having been adversely, continuously, peacefully, openly, exclusively, and notoriously possessed by the Republic of the Philippines as public lands.'

"The lower court then presided over by Judge Wenceslao Fernan, issued the following order on December 23, 1954 (pp. 127-128, Id.), to wit:

'x x in order to enable the parties to present evidence of ownership so that they may be able to establish absolute and indefeasible title, this Court orders that the hearing of this Civil Case No. 670 shall be held in abeyance and shall be set together with the hearing of this compulsory registration proceeding filed by the Republic of the Philippines on August 3, 1954 x x x.'

"On December 20, 1956, the Municipality of Bansalan filed an Opposition (pp. 213-218 id) alleging that the nine (9) parcels of land included in the petition for registration are reserved for the townsite of the Municipality of Bansalan as shown in the Plan of the Sta. Cruz Cadastre No. 275 and actually occupied by the said Municipality. Oppositor prayed that the above parcels be declared 'the townsite reservation of the Municipality of Bansalan'. On the other hand, private respondent and other claimants filed answers to the petition of the Director of Lands. Specifically, private respondent filed answers with respect to Lot 2305 (pp. 235-240, id); Lot 2319 (pp. 371-378, id); Lot 2325 (pp. 242-250, id); Lot 2325-1A (pp. 400-407, id); Lot 2326 (pp. 293-301, id); Lot 2342 (pp. 322-329, id); Lot 2343 (pp. 343-350, 357-364, id); Lot 2344 (pp. 385-392, id); Lot 2344-1A (pp. 407-415, id); Lot 32416 (pp. 378-385, id); and Lot 2417 (pp. 350-357, id), claiming that he acquired these lots by 'purchase from (his) predecessor Datu Julian (Bagobo)'. It is to be stated at this juncture that most of the hearings held in 1957 were conducted by then District Judge Wenceslao Fernan. They were completed in 1960 during the time of Judge Honorio Romero (pp. 414-415; 418-419, id). After some delay in the completion of the transcripts of stenographic notes (supra, p. 445, id), the cases were finally considered submitted for decision on June 1, 1966 before the Honorable Maneses G. Reyes (id). Four weeks thereafter, or on June 29, 1966, the lower court rendered a decision (pp. 445-478, id) the conclusions and dispositive portion of which are hereunder reproduced for ready reference as follows:

'The evidence presented by the parties considered, the following appeared clear to the Court:

- '1. That in the cadastral proceeding none of the defendants in Civil Case No. 670 ever filed their answer.
- '2. That plaintiff Zartiga's right and title to the land in question was derived by purchase from his predecessor in interest, Datu Julian Bagobo.
- '3. That there is ample reason(s) and evidence to believe that in the year 1941, the Cadastral Court awarded the

lots of Zartiga.

'4. That Datu Julian Bagobo and Sumalide way back in Spanish time (were) the possessor(s) and owners of the land; that upon his death the land passed to Datu Bacung, and, upon the demise of said person the land passed to Datu Julian Bagobo who in turn sold the land to the herein plaintiff.

'These above facts stated could be gleaned from the recorded declarations of Datu Julian Bagobo, Salumay Ubad, and the same could also be gleaned from the declaration of Amando Quidato and of course the declaration of plaintiff Zartiga.

'The evidence that the lots were awarded to the plaintiff by the Cadastral Court would be gleaned from the recorded declarations of Atty. Domiciano Gaerlan, practicing attorney who positively declared that Judge Enrique Fernandez, the Cadastral Court Judge, awarded 7 lots to the plaintiff, Exhibit "G", blue print plan of Sta. Cruz Cadastre.

'The evidence likewise show that witness Juan Sarenas, former Judge of the Court of First Instance of Cotabato, positively stated that having represented plaintiff in a cadastral case before Judge Enrique Fernandez, the latter rendered a decision in favor of plaintiff Zartiga.

' xx xx xx.

'Considering, however, that the evidence show that a portion of the lot occupied by the P.C. Barracks, the Roman Catholic Church, Boy Scout of the Philippines, the Elementary school, the 7th Day Adventist has been donated to the same, and considering further that lot 2305, Atanacio Florentino has already a title in his favor as shown by the exhibit presented. And Lot 2417 is already titled to Cristobal Gutierrez as shown also by the exhibit duly presented. And the lot occupied by Emilio Guinoo forms part formerly of the concession of his brother Vicente Guinoo, and also considering that the very evidence of the plaintiff shows that only one-half (1/2) of Lot 2319 was adjudicated to Zartiga, and Lot 2343 and one-half (1/2) of Lot 2319 declared Public Land, the Court, therefore concludes that the above-mentioned lots should be excluded from the litigated property claimed by plaintiff Zartiga.

'WHEREFORE, premises considered, judgment is hereby rendered as follows:

'(a) - Under Civil Case No. 670, adjudging in favor of plaintiff; ordering defendants to vacate therefrom and restitute to plaintiff's possession of the respective portion occupied by them, with the exception of those mentioned above.

'The claim for damages, not having been duly established and proven is hereby denied.

'Under the Registration Case, granting and confirming Zartiga's title to the litigated portion of the Lot, with the exception of those men-tioned above in the decision.

'(b) - Ordering the cancellation of whatever title that have been granted the Land Department to the claimants, with the exception of those mentioned in the decision, with costs against defendants.

'SO ORDERED' (pp. 473-478 Record on Appeal).

"On July 26, 1966, defendants-appellants and the Municipality of Bansalan, through the Occeña Law Office, filed their notice of appeal and appeal bond.

"On August 13, 1966, the Provincial Fiscal of Davao filed a motion declaring, among others, that the notice of appeal and the record on appeal filed on July 26, 1966 and on August 5, 1966, respectively, are 'hereby adopted by the undersigned as a notice of appeal and record on appeal of the oppositor, the Municipality of Bansalan x x x' (pp. 545-547, id). Likewise, the private respondent appealed from the decision after motion for reconsideration filed on August 2, 1966 was denied by Order of November 19, 1966, and adopted the record

on appeal of appellants (pp. 482-533, 569-570, 570-573, 573-574, id).

"On December 16, 1966, the lower court approved the Joint Amended Record on Appeal and ordered the records of the case transmitted to the respondent Court (pp. 577-578, id).

"In CA-G.R. No. 39870-R, entitled 'Republic of the Philippines (Bureau of Lands), Petitioner, vs. Salvador V. Zartiga and Hon. Maneses G. Reyes as Judge of Branch III, Court of First Instance of Davao, Respondents', for mandamus and certiorari, respondent Court of Appeals, on February 5, 1968 directed that the appeal of the Director of Lands (herein petitioner) be given due course.

"On January 6, 1977, respondent Court of Appeals promulgated the questioned decision (Appendix 'A' hereof) affirming with modification the decision of the lower court in Civil Case No. 670 and Cadastral Case N-8, LRC Record No. N-95. Motions for reconsideration having been denied by resolution of the respondent Court dated April 19, 1977, herein petitioner filed its petition for review on certiorari on July 22, 1977" (pp. 3-13, Record on Appeal, p. 178, rec.).

Defendant- Appellee Emilio Guinoo, defendants-appellants other than Zartiga's heirs and the Director of Lands filed their separate motions for reconsideration of aforesaid decision (pp. 43 and 84, L-46068-69).

On April 19, 1977, respondent Court denied the motions for reconsideration of petitioners Director of Lands and Emilio Guinoo (pp. 43 and 101, L-46068-69).

On May 6, 1977, petitioner Director of Lands filed a notice of appeal with respondent Court. (p. 43, L-46068-69).

Petitioners have consistently and unanimously maintained several errors in the questioned decision of respondent Court which can be narrowed down to the following:

1. Respondent Court erred in ruling that private respondent Salvador Zartiga succeeded in establishing lawful acquisition of the parcels of land under question.
2. Respondent Court erred in holding that possession of the lots, if ever there was such possession, could ripen into ownership.
3. Respondent Court erred in pronouncing that identity of the land had been sufficiently established.

Private respondent, on the other hand, has contended that:

- a. The municipality of Bansalan is merely a squatter on the lots in controversy and hence, has no valid claim.
- b. The issues raised by petitioners are actually factual questions which cannot merit review on certiorari.
- c. The land has been sufficiently identified and the claim that it is a townsite becomes untenable.

Private respondent's claim of ownership over the lots is anchored on the alleged purchase of the same from Datu Julian Bagobo, the alleged original owner.

Before WE go into further consideration of the merits of the alleged purchase of the nine lots, WE must first resolve the status of the said lots at the precise time when Datu Julian Bagobo allegedly sold the same to private respondent for the purpose of determining whether or not they could be the subject of the alleged sale. In fine, the initial question to answer is: What was the nature of the parcels of land or more specifically, what was their classification in 1927 (when the sale was purportedly consummated) for the very purpose of determining whether the same could be validly transferred from vendor to vendee.

This would necessitate a review of the facts as were presented during the hearings and as were testified to by witnesses. Contrary to private respondent's averment that factual issues cannot be dealt with at this stage, WE

only have to remind him that this Court has repeatedly enunciated that "the findings of fact of the Court of Appeals are conclusive on the parties and on the Supreme Court, unless (1) the conclusion is a finding grounded entirely on speculation, surmise, and conjectures; (2) the inference made is manifestly mistaken; (3) there is grave abuse of discretion; (4) the judgment is based on misapprehension of facts; (5) the Court of Appeals went beyond the issues of the case and its findings are contrary to the admission of both appellant and appellee; (6) the findings of facts of the Court of Appeals are contrary to those of the trial court; (7) said findings of facts are conclusions without citation of specific evidence on which they are based; (8) the facts set forth in the petition as well as in the petitioner's main and reply briefs are not disputed by the respondents; and (9) when the findings of facts of the Court of Appeals is premised on the absence of evidence and is contradicted by evidence on record" (*Macadangdang vs. Court of Appeals*, L-49542, September 12, 1980; 100 SCRA 73).

Contrary also to private respondent's claim that petitioner Municipality of Bansalan is a squatter on the questioned lots, it should be borne in mind that the said municipality assumed its legal personality and existence as early as June 6, 1950 by virtue of Executive Order No. 506 issued by then President Elpidio Quirino. In fact, the cadastral survey return as approved on March 31, 1941 had no indication of Zartiga's claim but said return instead reflected the Bansalan townsite reservation which was made under authority of the Bureau of Lands as evidenced by the Plan of the Sta. Cruz Cadastre No. 275. It must be noted that such survey commenced in 1936 and approved in 1941 or ten long years before private respondent filed his claim over the lots.

In the resolution of the aforesaid crucial question on the status of the nine lots, the following pertinent provisions of the Public Land Act (CA No. 141) and the Revised Administrative Code must be recalled:

"Sec. 6. The President, upon the recommendation of the Secretary of Agriculture and Commerce, shall from time to time classify the lands of the public domain into -

- a) Alienable or disposable,
- b) Timber, and
- c) Mineral lands,

and may at any time and in a like manner transfer such lands from one class to another, for the purposes of their administration and disposition.

"Sec. 8. Only those lands shall be declared open to disposition or concession which have been officially delimited and classified and, when practicable, surveyed, and which have not been reserved for public or quasi-public uses, nor appropriated by the Government, nor in any manner become private property, nor those on which a private right authorized and recognized by this Act or any other valid law may be claimed, or which, having been reserved or appropriated, have ceased to be so. However, the President may, for reasons of public interest, declare lands of the public domain open to disposition before the same have had their boundaries established or been surveyed, or may, for the same reason, suspend their concession or disposition until they are again declared open to concession or disposition by proclamation duly published or by Act of the National Assembly.

"Sec. 9. For the purpose of their administration and disposition, the lands of the public domain alienable or open to disposition shall be classified, according to the use or purposes to which such lands are destined, as follows:

- a) Agricultural,
- b) Residential, commercial, industrial, or for similar productive purposes.
- c) Educational, charitable, or other similar purposes.

d) Reservations for town sites and for public and quasi-public uses.

" xx xx xx.

"Sec. 10. The words 'alienation', 'disposition', or 'concession' as used in this Act shall mean any of the methods authorized by this Act for the acquisition, lease, use, or benefit of the lands of the public domain other than timber or mineral lands" (Chapter II, CA No. 141, underscoring supplied).

"Sec. 1820. Words and phrases defined. - For the purposes of this chapter, 'public forest' includes, except as otherwise specially indicated, all unreserved public land including nipa and mangrove swamps and all forest reserves of whatever character" (Revised Administrative Code).

In the light of the aforequoted legal provisions, WE find the following testimony of witnesses decisively descriptive and definitive of the real nature of the parcels of land under question:

Witness Datu Julian Bagobo (alleged vendor) testified thus:

"Q - Do you know or don't you know what is the width of one hectare?

"A - What I know is that when we make kaingin - - this term hectare is new, because in our case we Bagobos we divide areas of land by virtue of kaingin system. In other words, one strip of kaingin is one division insofar as we Bagobos are concerned, and when we came to know these hectares we found out that a hectare is more or less one kaingin cultivation. So that, one kaingin is approximately one hectare" (TSN, August 7, 1957, pp. 9-10, underscoring supplied).

Witness Sulamay Abad (farmer) likewise declared:

"Q - Why do you know that land when it was still under Datu Sumalide?

"A - Because my father was working there.

"Q - Working as what in that land?

"A - He was making kaingin.

" xx xx xx.

"Q - You said that Sumalide was occupying the land. What was he doing in that land you said he occupied?

"A - He was making kaingin.

"Q - What is the purpose of the kaingin?

"A - To be planted" (TSN of August 12, 1957, p. 50, underscoring supplied).

Witness Artemio Cometa (Justice of the Peace of Sta. Cruz, Davao) thus confirmed:

"Q - You stated that there were abaca plants scattered on that place, north of the land covered by the lease application, is that correct?

"A - Yes, sir.

"Q - How about the area covered by the lease application of Zartiga, was that not covered by abaca?

"A - No. All forest" (TSN dated August 16, 1957, p. 143, emphasis supplied).

Thus, too, witness Florencio Rojas (farmer) testified:

"Q - When you were constructing that road in Bansalan what was the physical condition of the land thru which

the road was being constructed?

"A - Forest.

"Q - And how big were the trees in those forests?

"A - Not the same. There were those two meters in circumference and four meters in circumference and those big were Bayog, Tugas, Mandarangit, Bago and I do not know the others" (TSN of December 17, 1957, p. 24, underlining supplied).

In *Ramos vs. Director of Lands* (No. 13298, November 19, 1918, 39 Phil. 175), a case which long preceded the alleged transaction involving the lots in question, this Court had the occasion to define forest. It thus stated:

"The lexicographers define 'forest' as a large tract of land covered with a natural growth of trees and underbrush; a large wood.

"Legal authorities say that the word 'forest' has significant, not an insignificant meaning, and that it does not embrace land only partly woodland. It is a tract of land covered with trees, usually of considerable extent."

For the purpose of protecting and conserving the public character of forests, the Revised Administrative Code has explicitly provided under Section 1824 that "the public forests of the Philippines shall be held and administered for the protection of the public interests, the utility and safety of the forests, and the perpetuation thereof in productive condition by wise use; and it is the purpose of this chapter to provide for the same."

Corollary to the aforestated policy of the State, Section 1825 of the said Code explicitly states:

"No prescriptive right to the use, possession, or enjoyment of any forest product, nor any permanent concession, continuing right, privilege or easement of any kind whatsoever upon or within the public forests and respecting the products thereof, shall accrue or be granted otherwise than in conformity with the provisions of this law, and except as specially provided, all such forests shall be and remain open to the people of the Philippines for all lawful purposes."

Thus, pursuant to the protective mantle of the State over public forests, Forestry Administrative Order No. 1 dated August 1, 1946 was issued. Said order prescribes rules and regulations governing the issuance of gratuitous kaingin permits for areas not more than one hectare within unclassified public forests which are potentially agricultural lands for the purpose of raising temporary agricultural crops.

WE have already ruled that forest lands are not susceptible of private appropriations.

"Thus, the Supreme Court held that the land sought to be registered being forest land it was not susceptible of private appropriation under existing laws nor was its inclusion in the possessory document justified under the prior laws, which prohibited the alienation of forest lands (*Li Seng Giap vs. Dir. of Lands*, 55 Phil. 693; *Director of Lands vs. David*, 51 Phil. 324; *Fernandez vs. Dir. of Lands*, 57 Phil. 929) [cited in "The Law on Natural Resources, Castrillo, p. 268, 1957 Ed.].

Evidently, the litigated area was forestal land. The fact that Datu Julian Bagobo and the other occupants had to make kaingin in order to clear the lots is certainly indicative of the forestal nature of the same. Datu Julian Bagobo and his predecessors who claimed possession over the area did not and could not have acquired ownership over the said land considering that the same was then inalienable and non-disposable. It remained so for many years. In fact, it was only on February 4, 1956 when the contested portions of the public domain were declared and classified as alienable and disposable per Forestry Administrative Order No. 4-480 issued on aforesaid date by the then Secretary of Agriculture and Natural Resources (Exhibit "32", p. 112, CFI rec.).

From the bulk of documentary and testimonial evidence of these three cases, one very significant and revealing

testimony of Datu Julian Bagobo, the alleged owner-vendor, has surfaced, and such testimony was obviously overlooked or completely ignored by the lower court and respondent Court but which, to OUR mind, crystallizes the real and actual situation prevailing at the time of the alleged sale of the nine lots. Thus, WE quote:

"Q - Do you remember having made your thumbmark in any declaration about this land?

"A - The very first time I was ordered to pay my taxes, and I said that when I received an order that they will let me pay taxes I told the treasurer that I do not know. So the treasurer ordered me that he will issue a declaration, and then when I already had a declaration I immediately sold it to Mr. Zartiga" (TSN of August 9, 1957, p. 43, emphasis supplied).

It should be noted that the first tax declaration (Tax Dec. No. 4329) was dated February 11, 1927, the very same date when respondent Zartiga claimed he bought the lots from Datu Julian Bagobo.

The picture becomes clear enough. Respondent Zartiga knew that he could not directly acquire the lots since they were part of the public domain. So, he had to get access to the land indirectly. He also realized that the indirect way was Datu Julian Bagobo who claimed possession over the area. He had to clothe the datu with a color of ownership so that the latter could subsequently transfer the land to him. Respondent accomplished this in a haphazard manner -- by railroading the issuance of a tax declaration to the uneducated datu and manipulating the alleged sale within the same day. This explains why there could not be sufficient and concrete evidence of the alleged deed of sale, why the contested lots could never be accurately identified (boundaries were not uniformly identified) and why private respondent never raised a hand when the townsite of Bansalan was being developed (per TSN dated November 27, 1957, pp. 90-91).

Even assuming, for the sake of discussion, that the alleged sale was entered into between the datu and private respondent, still the same would not be valid by virtue of the explicit provisions of Section 84 of Commonwealth Act No. 141 which declares such sale as illegal and of no effect. The proviso of the said section thus provides:

"x x x Provided, That all grants, deeds, patents and other instruments of conveyance of land or purporting to convey or transfer rights of property, privileges, or easements appertaining to or growing out of lands, granted by sultans, datus, or other chiefs of the so-called non-Christian tribes, without the authority of the Spanish Government while the Philippines were under the sovereignty of Spain, or without the consent of the United States Government or of the Philippines since the sovereignty over the Archipelago was transferred from Spain to the United States, and all deeds, patents, and documents mentioned, are hereby declared to be illegal, void, and of no effect."

WHEREFORE, THE DECISION DATED JANUARY 6, 1977 AND THE RESOLUTION DATED APRIL 19, 1977 OF THE COURT OF APPEALS ARE HEREBY REVERSED AND SET ASIDE AND LOTS NOS. 2325, 2326, 2342, 2343, 2344 and 2316 ARE HEREBY DECLARED PUBLIC LANDS SUBJECT TO THE RIGHTS OF HEREIN PETITIONERS UNDER THE PUBLIC LAND LAW, WITH THE EXCEPTION OF LOTS 2305 AND 2317 WHICH HAD BEEN TITLED IN THE NAME OF ATANACIO FLORENTINO AND CRISTOBAL GUTIERREZ; AND PRIVATE RESPONDENT'S REINVENDICATORY ACTION IS HEREBY DISMISSED. COSTS AGAINST THE HEIRS OF SALVADOR ZARTIGA.

SO ORDERED.

Teehankee, (Chairman), Melencio-Herrera, Plana, Vasquez, Relova, and Gutierrez, Jr., JJ., concur.

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.