

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. WILSON FAYLOGNA Y ABIAN, ACCUSED-APPELLANT.

Ponente: LANTION, J.A.C., J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/a02d8094519a/>

LANTION, J.A.C., J.:

This is an appeal from the Decision[1] dated 2 May 2013 of the Regional Trial Court of Bangui, Ilocos Norte, Branch 19, finding accused-appellant Wilson Faylogna y Abian GUILTY beyond reasonable doubt of violation of Section 5, Article II of Republic Act No. 9165[2] (illegal sale of prohibited drugs) in Criminal Case No. 2056-19. The decretal portion of the said Decision reads:

"WHEREFORE, the court finds the accused Wilson Faylogna GUILTY beyond reasonable doubt of violation of Section 5, R.A. No. 9165 or the Comprehensive Dangerous Drugs of 2002, and hereby imposes upon him the penalty life imprisonment plus a fine of Five hundred thousand pesos (P500,000.00), and to pay the costs.

The methamphetamine hydrochloride or shabu subject of this case is hereby declared forfeited in favor of the government, to be destroyed in accordance with the aforesaid law. The clerk of court is directed to coordinate with the Philippine Drugs Enforcement Agency for this purpose.

SO ORDERED."[3]

THE ANTECEDENTS

The indictment of accused-appellant Wilson Faylogna (hereafter Appellant) stemmed from the Information[4] filed against him which pertinently reads:

xxx xxx

That on or about 5:30 o'clock in the afternoon of February 9, 2012, at Poblacion 2, in the municipality of Pagudpod, province of Ilocos Norte, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, did then and there willfully, unlawfully, feloniously and knowingly sell one heat sealed transparent plastic sachet containing methamphetamine hydrochloride, commonly, known as "shabu", a dangerous drug, weighing .0455 gram, worth Php 2,000.00 to poseur-buyer IO1 RICHIE CAMCHO, without the necessary license or authority from the appropriate government agency or authority to do so.

CONTRARY TO LAW.

xxx xxx

When arraigned, Appellant pleaded "not guilty" to the charge against him.[5] Both the Prosecution and the Defense stipulated: "that at about 5:30 o'clock in the afternoon of February 9, 2012, the accused was then in their house at Pob. 2 Pagudpod, Ilocos Norte."[6] Thus, on 5 July 2012, pre-trial was deemed terminated.

Trial ensued thereafter, with the Prosecution presenting 1.) Intelligence Officer (IO) 1 Richie Camacho; 2.) Police Officer (PO)3 Joey Aninag; and Police Inspector (P/Insp.) Amiely Ann Navarro.

On the other hand, the Defense presented the testimonies of Marciano Domingo and Appellant himself.

THE FACTS

(As culled from the Records)

The Prosecution's version is synthesized by the Office of the Solicitor General as follows:[7]

"At About twelve o'clock noon on February 9, 2012, a confidential agent for the Philippine Drug Enforcement Agency (PDEA) arrived at the PDEA office in San Nicolas, Ilocos Norte. The informant approached Intelligence Officer 1 (IO1) Rechie Camacho to report the illegal drug activities of a certain "Tikong" who was later identified as herein appellant Wilson Faylogna. IO1 Camacho introduced the informant to their team leader, Investigation Agent 5 (IA5) Melvin S. Estoque, who thereafter interviewed the informant. The latter declared that he could accompany the PDEA agents to buy methamphetamine hydrochloride, more commonly known as shabu, from appellant. IA5 Estoque contacted the Provincial Anti-Illegal Drugs Special Operation Task Group (PAIDSOTG) to provide assistance in their planned buy-bust operation against appellant.

Shortly after the call, the PAIDSOTG team arrived at the PDEA office. The PAIDSOTG team was composed of their team leader, Captain Licudan, and team members PO2 Pola, PO2 Sygman Benigno, PO2 Sulmerin and PO3 Joey Aninag.

IA5 Estoque conducted a briefing for the buy-bust operation against appellant. IO1 Camacho was designated as the poseur buyer while PO3 Aninag was appointed as his immediate backup who will assist in arresting appellant. IA5 Estoque gave IO1 Camacho one (1) genuine one thousand peso (Php1,000.00) bill with serial number LH471776 and one (1) counterfeit one thousand peso (Php1,000.00) bill with serial number Z451636 as buy-bust money. IO1 Camacho placed his initials "RQC" on the front lower right portion of the bills. It was agreed that IO1 Camacho will signal the consummation of the buy-bust transaction by removing his bull cap.

At about two-thirty in the afternoon that same day, the buy-bust team composed of four (4) agents from PDEA, five (5) PAIDSOTG officers and one (1) confidential informant, boarded a van and proceeded to Pagudpud, Ilocos Norte. At about four o'clock in the afternoon, the team arrived at the area beside Hannah's Resort in Pagudpud, Ilocos Norte where they conducted the final briefing. At about five o'clock in the afternoon, IO1 Camacho, PO3 Aninag and the confidential informant boarded a tricycle and proceeded to appellant's house. The rest of the buy-bust team followed on board the van.

After about ten (10) minutes, IO1 Camacho, PO3 Aninag and the confidential informant arrived at appellant's house in Poblacion 2, Pagudpud, Ilocos Norte. IO1 Camacho and the confidential agent alighted from inside the tricycle while PO3 Aninag went down from behind the tricycle driver. PO3 Aninag positioned himself around ten (10) meters away on the other side of the road where he can view the transaction. The rest of the buy-bust team positioned themselves within the area and provided perimeter security.

IO1 Camacho and the informant approached appellant who was sitting outside his house. The informant introduced IO1 Camacho to appellant as someone who was interested in buying shabu. Appellant asked how much shabu IO1 Camacho wanted to buy and the latter replied two thousand pesos (Php2,000.00) worth. Appellant then handed one (1) heat-sealed transparent plastic sachet containing a white crystalline substance. IO1 Camacho inspected the contents of the plastic sachet, handed appellant the two marked bills as payment, and removed his bull cap. Upon seeing the pre-arranged signal indication that the buy-bust transaction had been consummated, PO3 Aninag immediately approached them, introduced himself as a police officer, and placed appellant under arrest. Three (3) other members of the buy-bust team rushed to the scene to provide assistance. IO1 Camacho informed appellant of his rights and assisted in handcuffing him. IO1 Camacho also searched appellant and recovered the buy-bust money from his right front pocket.

While at the place of arrest, IO1 Camacho started preparing the inventory, marking the items confiscated from appellant and taking their photographs. However, because the crowd of civilians surrounding them was

steadily increasing in size, the buy-bust team leader was constrained withdraw his team from the area for security reasons. The buy-bust team and appellant proceeded to the Pagudpud Police Station where IO1 Camacho continued the inventory of the confiscated items and completed the Certificate of Inventory. IO1 Camacho maintained custody over the seized items from appellant's house to the police station. The inventory was witnessed by appellant and Barangay Councilor Rocky Curamment who likewise signed the Certificate of Inventory.

At about twelve fifteen in the early morning of February 10, 2012, IO1 Camacho brought a letter-request for laboratory examination signed by IA5 Estoque and the plastic sachet obtained from appellant to the Philippine National Police (PNP) Crime Laboratory. IO1 Camacho maintained custody over the plastic sachet from the Pagudpud Police Station to the PNP Crime Laboratory where he turned over both the letter-request and the plastic sachet to PO1 Erlanger F. Aguinaldo, the Police Non-Commissioned Officer (PNCO) tasked to receive requests from other police stations and government agencies at that time.

At about twelve twenty in the morning of February 10, 2012, Forensic Chemist Amiely Ann Luis Navarro received the letter-request and the subject plastic sachet from PO1 Aguinaldo and conducted qualitative and quantitative examinations on the white crystalline substance contained therein. She prepared an Initial Laboratory Report indicating that the 0.0455 gram of white crystalline substance contained in the plastic sachet submitted for examination tested positive for the presence of methamphetamine hydrochloride, also known as shabu, a dangerous drug. She likewise prepared Chemistry Report No. D-007-2012-IN which affirmed the findings contained in the Initial Laboratory Report. The examination and the report were finished at around two fifteen in the morning of February 10, 2012. After the laboratory examination, Forensic Chemist Navarro placed the small plastic sachet inside a bigger transparent plastic bag which she marked with her initials "AALN", the date February 10, 2012, and the case number D-007-2012. She then turned over the marked item to SPO2 Flojo, the evidence custodian of the PNP Crime Laboratory who was on duty at the time. On March 2, 2012, the specimen was turned over by SPO2 Flojo to PO1 Aguinaldo who was designated as evidence custodian in her stead. On November 22, 2012, Forensic Chemist Navarro retrieved the subject plastic sachet from PO1 Aguinaldo and submitted the same to the court a quo."

In his Brief,[8] Appellant's version of the facts was narrated as follows:

"14. Accused vehemently denied that the PDEA-PAIDSOTG implemented a buy-bust operation as Accused claimed that on or about the material time and date that the alleged drug bust was undertaken he was then inside his house while preparing food and liquor for the men he had hired to dig a well at the back of his house as they were about to complete the project;

15. Accused testified that three (3) days prior to the alleged police raid, he hired three men named Marciano Domingo, Robi Dalusong and Arman Rico to dig a well only a meter away from the house's western wall and adjoining the back door;

16. That at about the same time the alleged drug bust happened, Accused testified that he was inside the living room of his house and making a call on his cellular phone when a van abruptly stopped at the eastern side of his house just in front (sic) of his house of his house;

17. Two men alighted therefrom and they went to the northern side of his house and through a jalousie window asked the accused if he knew a certain "Tikong" and when Accused said it was him, the two men went through the back door of the house and grabbed and frisked him but found no contraband in his possession;

18. Other men got down from the van and then entered accused Tikong's house and they eventually searched the premises over his objections as he wanted the local Barangay Chairman to be contacted but his pleas went unheeded;

19. The men headed by PCI Licudan then just brought him to the PNP Pagudpud Municipal Police Station

where the alleged sachet of shabu was there shown to him for the first time by Camacho and that he was told that he was being charged for illegal sale of shabu;

20. Marciano Domingo, the eldest of the three (3) men who had been digging the well at the western side of the Accused's house and close to the backdoor testified that they were about to complete their well - excavation project at around 5 PM of February 9, 2012 when he saw two men barged into the Accused's house thru the backdoor and they proceeded directly to his (Accused's) location at the sala and frisked him and that other men then went inside the house using the backdoor; the men afterward brought with them the Accused when they left the house;"

On 2 May 2013, the court a quo rendered the assailed Decision.

Appellant filed a Motion for Reconsideration[9] but the same was denied by the court a quo.[10]

Aggrieved, Appellant appealed the Decision of the court a quo raising following assignment of errors:

I THE LOWER COURT ERRED IN DECIDING THAT THERE WAS A VALID BUY-BUST OPERATION JOINTLY UNDERTAKEN IN A REGULAR MANNER BY THE PDEA AND PAIDSOTG.

II THE LOWER COURT ERRED IN GIVING FULL FAITH AND CREDIT TO THE TESTIMONIES OF AND OTHER EVIDENCE PRESENTED BY THE MEMBERS OF THE PDEA-PAIDSTOG AND THEIR WITNESSES.

III THE LOWER COURT ERRED IN NOT GIVING FULL FAITH AND CREDIT TO THE TESTIMONY OF THE ACCUSED AND HIS WITNESS.

IV THAT ASSUMING THE SEIZED EVIDENCE IS ADMISSIBLE, THE PROSECUTION FAILED TO PROVE THE GUILT OF THE ACCUSED BEYOND REASONABLE DOUBT.[11]

THIS COURT'S RULING

Perusing the four (4) assignment of errors, Appellant principally argues that the court a quo erred in convicting him despite the Prosecution's alleged failure to prove his guilt beyond reasonable doubt. In contending that he should be acquitted, Appellant banks on the alleged procedural lapses committed by the police officers who failed to mark the seized drugs at the scene of the crime and to conduct a physical inventory of the same in the presence of the accused or his counsel, a representative from the media, the Department of Justice and any elected public official, resulting in the failure of the Prosecution to establish the corpus delicti of the crime charged. Appellant further insists that his acquittal at bar is justified since the Prosecution failed to prove that the integrity and evidentiary value of the drugs had been adequately preserved through an unbroken chain of custody.

The appeal fails.

It bears stressing that criminal prosecutions involving violations of Sections 5, Article II of R.A. No. 9165 depend largely on the credibility of the police officers who conducted the buy-bust operation. We likewise take note of the well-entrenched rule that the findings of fact of the trial court as well as its calibration of the evidence of the parties, its assessment of the credibility and probative weight of the witnesses, and its conclusion based on its findings are accorded by the appellate court high respect, if not conclusive effect.[12] Given the opportunity to observe the witness on the stand, the trial judge is in a vantage position to assess the demeanor of the witnesses and determine if they are telling the truth or not.[13] Hence, the findings of the lower court on this point are accorded great respect and will not be reversed on appeal, unless it overlooked substantial facts and circumstances which, if considered, would materially affect the result of the case.[14]

Apparently, the only defense being raised by Appellant in the present appeal is the alleged failure of the arresting

officers to strictly comply with the requirements of Section 21, paragraph 1, Article II of RA No. 9165. On account thereof, Appellant posits that his conviction for illegal sale and possession of dangerous drugs must be set aside.

Section 21, paragraph 1, Article II of RA No. 9165 provides for the custody and disposition of the confiscated illegal drugs, to wit:

xxx xxx

1. The apprehending team having initial custody and control of the drugs shall, immediately after seizure and confiscation, physically inventory and photograph the same in the presence of the accused or the person/s from whom such items were confiscated and/or seized, or his/her representative or counsel, a representative from the media and the Department of Justice (DOJ), and any elected public official who shall be required to sign the copies of the inventory and be given a copy thereof;

xxx xxx

In relation thereto, Sec. 21 (a) of the Implementing Rules and Regulations of RA No. 9165, provides:

xxx xxx

(a) The apprehending officer/team having initial custody and control of the drugs shall, immediately after seizure and confiscation, physically inventory and photograph the same in the presence of the accused or the person/s from whom such items were confiscated and/or seized, or his/her representative or counsel, a representative from the media and the Department of Justice (DOJ), and any elected public official who shall be required to sign the copies of the inventory and be given a copy thereof; Provided, that the physical inventory and photograph shall be conducted at the place where the search warrant is served; or at the nearest police station or at the nearest office of the apprehending officer/team, whichever is practicable, in case of warrantless seizures; Provided, further, that non-compliance with these requirements under justifiable grounds, as long as the integrity and evidentiary value of the seized items are properly preserved by the apprehending officer/team, shall not render void and invalid such seizures of and custody over said items . . . (Boldface supplied for emphasis)

xxx xxx

Granting *arguendo* that the buy-bust team failed to strictly implement the post-operational requirements of the seized drugs as stated under Section 21 of RA 9165, the above-mentioned provision of the Implementing Rules and Regulations of said Republic Act offers some flexibility with regard to the custody and disposition of the confiscated illegal drugs. Even jurisprudence has it that non-compliance with the procedures under Section 21 (a), Article II of RA No. 9165 shall not invalidate the legitimate drug operation conducted by the police operatives.[15] On this point, the pronouncement of the Supreme Court in *People vs. Dela Rosa*[16] is instructive, thus:

xxx xxx

Even granting *arguendo* that the prosecution failed to show that the police officers conducted the required physical inventory and photograph of the evidence confiscated pursuant to the aforesaid guidelines, the same is not fatal and does not automatically render appellant's arrest illegal or the items seized or confiscated from him inadmissible. What is of utmost importance is the preservation of the integrity and evidentiary value of the seized items, as it would be utilized in the determination of the guilt or innocence of the accused.

xxx xxx

What is essential is the preservation of the integrity and the evidentiary value of the seized items, as the same

would be utilized in the determination of the guilt or innocence of the accused.[17] In *People v. Dela Cruz*,[18] the Supreme Court pronounced:

xxx xxx

As a method of authenticating evidence, the chain of custody rule requires that the admission of an exhibit be preceded by evidence sufficient to support a finding that the matter in question is what the proponent claims it to be. It would include testimony about every link in the chain, from the moment the item was picked up to the time it is offered in evidence, in such a way that every person who touched the exhibit would describe how and from whom it was received, where it was and what happened to it while in the witness' possession, the condition in which it was received and the condition in which it was delivered to the next link in the chain. These witnesses would then describe the precautions taken to ensure that there had been no change in the condition of the item and no opportunity for someone not in the chain to have possession of the same.

xxx xxx

Upon meticulous study of the entire records of this case, We rule that the Prosecution has established with certainty that the police indeed complied with the required unbroken chain in the handling and custody of the subject drugs confiscated from Appellant and that the integrity and evidentiary value of the said items were preserved, viz:

a.) on 9 February 2012, Appellant was apprehended by IO1 Camacho and the arresting team after IO1 Camacho, who was acting as a poseur-buyer, received from Appellant one (1) heat-sealed sachet of shabu. Immediately upon arrest, IO1 Camacho searched Appellant's pockets and recovered the two (2) thousand pesos marked money used to buy the drugs from Appellant;

b.) IO1 Camacho immediately marked the heated-sealed plastic sachet with the initials "RQC" and his signature. After putting the said markings, the same remained in IO1 Camacho's possession until he and his fellow PDEA agents reached the Pagudpod Police Station;

c.) upon reaching the police station, IO1 Camacho prepared the Certificate of Inventory of the seized drugs which was witnessed by Appellant and barangay councilor Rocky Curameng. The Certificate of Inventory was likewise signed by IO1 Camacho and barangay councilor Curameng. Thereafter, the PDEA arresting team then prepared the Booking Sheet and Arresting Report Letter Request for Laboratory Examination[19] and Inquest Referral.

d.) together with the Request for Laboratory Examination, the one (1) plastic sachet were brought to the Ilocos Norte Provincial Crime Laboratory Office for testing;

e.) upon receipt of the subject drugs by PO1 Erlanger Aguinaldo, the same was examined by forensic chemist P/Insp. Amiely Navarro who found the same to be positive for shabu, a dangerous drug, as evidenced by Chemistry Report No. D-007-2012-IN.[20] After the examination, P/Insp. Navarro placed that seized drugs in a bigger transparent plastic bag and placed her initials "AALN", the date February 10, 2012 and the case number D-007-2012 thereon.[21]

f.) the seized drugs were turned over to the custody of the Prosecution and when they were presented during trial, IO1 Camacho identified the one (1) plastic sachets containing shabu seized from Appellant.[22]

Appellant further contends that the Prosecution failed to prove the guilt of his beyond reasonable doubt arguing that there are several inconsistencies in IO1 Camacho's testimony. Appellant contends that IO1 Camacho was unclear as to whether the buy-bust operation occurred inside or outside his house which cast serious doubts as to his guilt.

Appellants' arguments fail to persuade.

It is axiomatic that slight variations in the testimony of a witness as to minor details or collateral matters do not affect one's credibility as these variations are in fact indicative of truth and show that the witness was not coached to fabricate or dissemble.[23] For a discrepancy to serve as basis for acquittal, such must refer to significant facts vital to the guilt or innocence of the accused.[24] An inconsistency, which has nothing to do with the elements of the crime, cannot be a ground to reverse a conviction.[25]

Here, We find insignificant and inconsequential the alleged inconsistencies in IO1 Camacho's testimony as they have nothing to do with the elements of the crime. Besides, even the most candid witnesses oftentimes make mistakes or variations in their declarations considering the treachery of human memory.[26] The inconsistencies and discrepancies in IO1 Camacho's testimony referring to minor details and not upon the basic aspect of the crime do not diminish his credibility. In any case, these inconsistencies even bolster IO1 Camacho's credibility as he erased any suspicion of a rehearsed testimony.[27]

What further fortifies the credibility of the testimonies of IO1 Camacho and PO3 Aninag is the presumption of regularity in the performance of official functions. The presumption remains unrebutted because the Defense failed to present clear and convincing evidence that the PDEA agents and police officers did not properly perform their duty or that they were inspired by an improper motive.[28] Here, there is no showing that IO1 Camacho and PO3 Aninag were moved by ill motives to impute such a serious crime as sale of illegal drugs against the Appellant.

It is reiterated that that the findings of fact of the trial court as well as its calibration of the evidence of the parties, its assessment of the credibility and probative weight of the witnesses, and its conclusion based on its findings are accorded by the appellate court high respect, if not conclusive effect.[29] Given the opportunity to observe the witness on the stand, the trial judge is in a vantage position to assess the demeanor of the witnesses and determine if they are telling the truth or not.[30] It is only in exceptional circumstances, such as when the trial court overlooked material and relevant matters, that the appellate court will re-calibrate and evaluate the factual findings of the court below.[31] Here, We see no reason to depart from the foregoing rule.

In sum, We find no solid ground to reverse the ruling of the court a quo considering that Appellant's guilt for illegal sale of dangerous drugs was proven by the People beyond any iota of doubt. Hence, We are constrained to uphold his conviction.

WHEREFORE, the instant appeal is DISMISSED. The Decision dated 2 May 2013 of the Regional Trial Court of Bangui, Ilocos Norte, Branch 19, in Criminal Case No. 2056-19 is hereby AFFIRMED.

SO ORDERED.

De Leon, M.M., Chairperson and Antonio-Valenzuela, N.G., JJ., concur.

[1] Penned by Presiding Judge Rosemarie V. Ramos, Rollo, pp. 67-77

[2] Otherwise known as the Comprehensive Dangerous Act of 2002.

[3] Rollo, p. 77

[4] filed by Assistant Provincial Prosecutor Virgie Ines B. Ruiz-Lomuntad, Records, p.1

[5] On 4 June 2012. Records, p. 25

[6] See Pre-Trial Order dated 5 July 2012, Records, pp. 44-45

- [7] See Appellees' Brief, Rollo, pp. 55-69
- [8] Appellant's Brief, Rollo, pp. 28-40
- [9] Records, pp. 97-110
- [10] Order dated 31 May 2013, Id., p. 115
- [11] Rollo, p. 47
- [12] People vs Leonor, G.R. No. 132124, June 08, 2004
- [13] People vs. Alzaga, G.R. No. 144937, February 26, 2004
- [14] See People vs Hajili, G.R. Nos. 149872-73, March 14, 2003
- [15] See Zalameda vs People, G.R. No. 183656, September 04, 2009. See also People vs Campomanes G.R. No. 187741, August 08, 2010
- [16] G.R. No. 185166. January 26, 2011.
- [17] People v. Pagkalinawan, G.R. No. 184805, March 3, 2010, 614 SCRA 202, 218, citing People v. Naquita, 560 SCRA 430, 448 (2008).
- [18] G.R. No. 181545, October 8, 2008, 568 SCRA 273, citing Lopez v. People, G.R. No. 172953, April 30, 2008, 553 SCRA 619.
- [19] Exhibit "B", Records, p. 11
- [20] Exhibits "D-1", Records, p. 61
- [21] TSN dated December 13, 2012, pp. 7-8
- [22] TSN dated January 31, 2013, p. 5
- [23] See People vs Ignas, G.R. Nos. 140514-15, September 30, 2003
- [24] People vs. Asaldo, G.R. No. 139790, July 4, 2002
- [25] People vs. Nelmidia, G.R. No. 184500, September 11, 2012
- [26] People vs. Perez, G.R. No. 113265, March 5, 2001
- [27] See People vs. Lazaro, G.R. No. 186418, October 16, 2009
- [28] Ambre vs. People, G.R. No. 191532, August 15, 2012
- [29] See Managan vs Court of Appeals, G.R. No. 139908, March 10, 2004
- [30] People vs Genita, Jr., G.R. No. 126171, March 11, 2004
- [31] People vs Alhambra, G.R. No. 207774, June 30, 2014

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.