

PEOPLE OF THE PHILIPPINES, APPELLEE, VS. SERGIO ABON Y ESTEBAN, APPELLANT.

G.R. No. 130662. October 15, 2003

Ponente: SANDOVAL-GUTIERREZ, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-130662/>

SANDOVAL-GUTIERREZ, J.:

For automatic review is the Decision[1] dated April 22, 1997 of the Regional Trial Court, Branch 47, Urdaneta, Pangasinan in Criminal Case No. U-8671, convicting Sergio Abon y Esteban, appellant, of qualified rape and sentencing him to suffer the supreme penalty of death. He was ordered to pay the victim, AAA, P50,000.00 as civil indemnity, P50,000.00 as moral and exemplary damages, and costs.

The Information charges appellant as follows:

"That on or about the month of January, 1995 at barangay xxxxxxxxxxxx, municipality of xxxxxxxxxxxx, province of xxxxxxxxxxxx, and within the jurisdiction of this Honorable Court, the said accused who is the grandfather of the victim, by means of force and intimidation, did then and there willfully, unlawfully and feloniously have carnal knowledge on the person of AAA, a woman of 13 years old, against her will.

"CONTRARY to Article 335, Revised Penal Code, as amended by Section 11, Rep. Act 7659."[2]

Upon arraignment on November 10, 1995, appellant, assisted by counsel, pleaded "not guilty." Trial ensued thereafter.

The evidence for the prosecution, as borne by the records, shows that complainant AAA was born on September 29, 1982[3] to spouses xxxxxxxx andxxxxxxxxxxxxxxxxxx. But the couple separated, prompting AAA, her elder sister xxxxxxxx, and younger brother xxxxxxxx to live with their paternal grandparents, appellant and xxxxxxxxxxxx, at Barangay xxxxxxxxxxxx. They provided for their support and education.

Sometime in January, 1995, at about 4:00 o'clock to 5:00 o'clock in the afternoon, appellant, AAA, then barely thirteen (13) years old, and xxxxxxxxxxxx were at their backyard gathering vegetables. Appellant instructed xxxxxxxxxxxx to buy cigarettes at the store. While AAA was harvesting some mangoes, appellant suddenly pulled down her shorts and drew his "panabas" (bolo). Frightened, she asked him what he was doing but he simply admonished her not to make any noise. He then proceeded to undress her and remove her panty. He also removed his shorts. Pointing the "panabas" to her, he ordered her to lie down. He placed himself on top of her, touched her breasts, and even forced her to hold his penis. Thereafter, he inserted his penis inside her vagina and sexually ravished her. She felt pain and dizziness. But still she tried to push him away. However, she was overpowered by his strength. After his bestial act, he dressed up and left for the farm.

Meanwhile, xxxxxxxxxxxx, who returned from the store, hid behind a mango tree. He saw both appellant and AAA naked, indulging in sexual activity. Scared, xxxxxxxxxxxx decided to go back to the store and then went home.

The next day, AAA informed her grandmother xxxxxxxxxxxx that she was sexually molested by appellant.

However, she refused to believe and even accused AAA of fabricating the incident. After a month, she stayed with her auntxxxxxxxx and revealed her traumatic experience to her.

On August 15, 1995, xxxxxxx brought AAA to Don Amadeo J. Perez, Sr. Memorial General Hospital at Urdaneta, Pangasinan. There, she was examined by Dr. Noel Obedoza who issued a Medical Certificate[4] with the following findings:

"(1)

No sign of external physical injury such as abrasions, contusion and laceration on examination;

"(2)

Hymen is ruptured with old healed laceration at 3-6 and 8 o'clock;

"(3)

Vaginal introitus admit tip of a forefinger with minimal resistance;

"(4)

Pregnancy test: negative (-)." (Emphasis supplied)

Dr. Obedoza confirmed on the witness stand that the lacerations at AAA's hymen were at 3, 6 and 8 o'clock positions and more than two to three weeks old.

AAA and her aunt reported the incident to the Binalonan Police Station, where she executed and signed a sworn statement. Eventually, she was brought to the Department of Social Welfare and Development in La Union.

The defense presented appellant, xxxxxxxxxxx, xxxxxxxxxxx and his other granddaughter as witnesses. Appellant denied having raped AAA, whom he admitted is his own granddaughter, being the daughter of his son Nelson. He claimed that in January, 1995, (the alleged date when the rape was committed), AAA was in Manila. The filing of the rape charge against him was instigated by xxxxxxxxxxx, his wife's niece, who felt slighted after Francisco Novido, his brother-in-law, transferred the possession and cultivation of his land to him (appellant) in place of xxxxxxx. AAA denounced him because she resented being disciplined by him and his wife.

xxxxxxxxxxx, appellant's wife, corroborated his testimony.

xxxxxxxxxxx; AAA's brother, recanted his earlier testimony for the prosecution, explaining that he was instigated by their aunt xxxxxxx in testifying against appellant.

On April 22, 1997, the trial court rendered a Decision, the dispositive portion of which reads:

"WHEREFORE, finding the accused SERGIO ABON y ESTEBAN GUILTY of the crime of incestuous rape under Article 335 of the Revised Penal Code, as amended by Section 11, Republic Act No. 7659, beyond reasonable doubt, he is hereby sentenced to suffer the supreme penalty of DEATH.

"In addition, he is ordered to pay the victim AAA the sum of FIFTY THOUSAND (P50,000.00) as indemnity, the sum of FIFTY THOUSAND (P50,000.00) as moral damages and exemplary damages, and the costs.

"SO ORDERED."[5]

Hence, this automatic review.

Appellant, in his brief, ascribes to the trial court the following errors:

"FIRST: THE TRIAL COURT GRAVELY ERRED IN NOT CONSIDERING THE FACT THAT THE

ACCUSED IS INNOCENT OF THE CRIME CHARGED.

"SECOND: THE TRIAL COURT GRAVELY ERRED IN NOT CONSIDERING THE FACT THAT THERE IS ULTERIOR OR ILL MOTIVE ON THE PART OF THE PRIVATE COMPLAINANT AND xxxxxxxxxx IN FILING THE RAPE COMPLAINT AGAINST THE ACCUSED.

"THIRD: THE TRIAL COURT GRAVELY ERRED IN NOT CONSIDERING THAT THE PROSECUTION'S EVIDENCE IS INSUFFICIENT TO SUPPORT CONVICTION OF THE ACCUSED.

"FOURTH: THE TRIAL COURT GRAVELY ERRED IN NOT CONSIDERING THAT THERE IS REASONABLE DOUBT AS TO THE TRUTH OF THE RAPE CHARGE, AND THAT THE DOUBT SHOULD BE RESOLVED IN FAVOR OF THE ACCUSED."

The law applicable to the case at bar is Article 335 of the Revised Penal Code, as amended by Republic Act No. 7659,[6] which provides:

"Article 335. When and how rape is committed. - Rape is committed by having carnal knowledge of a woman under any of the following circumstances:

- By using force or intimidation;
- When the woman is deprived of reason or otherwise unconscious; and
- When the woman is under twelve years of age or is demented.

"The crime of rape shall be punished by reclusion perpetua.

x x x

"The death penalty shall also be imposed if the crime of rape is committed with any of the following attendant circumstances:

- When the victim is under eighteen (18) years of age and the offender is a parent, ascendant, step-parent, guardian, relative by consanguinity or affinity within the third civil degree, or the common-law-spouse of the parent of the victim.

x x x."

Under the above provisions, the essential elements of incestuous rape are: (1) the offender had carnal knowledge of a woman; (2) the victim is under eighteen (18) years of age; and (3) the offender is a parent, ascendant, step-parent, guardian, relative by consanguinity or affinity within the third civil degree, or the common-law-spouse of the parent of the victim.

Appellant, in assailing the evidence for the prosecution, contends that: (1) AAA admitted in the course of her testimony that at the time of the commission of the crime in January, 1995, she was actually in Metro Manila; (2) there is substantial delay of 240 days or 8 months before she reported the crime to the proper authorities; (3) the prosecution failed to establish his guilt beyond reasonable doubt because its witness xxxxxxxx recanted his testimony; (4) the results of AAA's physical examination negate the finding that she was raped; and (5) the filing of the complaint was instigated by AAA's aunt.

In a prosecution for rape, the victim's credibility becomes the single most important issue, and when her testimony satisfies the test of credibility, an accused may be convicted solely on the basis thereof.[7]

The trial court, in giving full credence to AAA's testimony, held:

"This Court observed the deportment and demeanor of the complainant when she testified on the witness chair.

She uncontrollably cried while narrating her unfortunate experience. She appeared candid and honest in her testimony; unsophisticated and so young. She claimed to have been born on 29 September 1982, which claim was never rebutted by the accused. It would appear that when she was allegedly sexually abused, she was less than thirteen years old. She was only in elementary school.

"She was subjected to thorough, extensive and rigid cross-examination for three settings, but her testimony remained unshaken. While there may have been some inconsistencies and contradictions in her testimony, these were expected considering her juvenility and inexperience and her apparent inability to grasp the cross-examination questions."

Indeed, AAA's declaration has sufficiently and convincingly proved that appellant had sexually ravished her sometime in January, 1995. Her direct and straightforward account of the harrowing incident could not be any clearer, thus:

"X X X

"Q.

Sometime in the month of January, 1995, do you recall if there was any unusual incident that happened to you at your place?

X X X

A.

Yes, sir.

Q.

What was that all about?

A.

was raped by my grandfather, sir.

Q.

What is the name of your grandfather?

A.

Sergio Abon, sir.

Q.

If Sergio Abon whom you claimed raped you sometime in the month of January, 1995 is now inside the courtroom, kindly stand up and point to said accused?

A.

Witness stood up and pointed to a person who when asked of his name, answered Sergio Abon.

Q.

You said that Sergio Abon raped you, where did he rape you?

A.

At the back of our house, sir.

Q.

And what time of the day if you remember?

A.

In the afternoon, sir.

Q.

About what time did he rape you?

A.

Between 4:00 o'clock to 5:00 o'clock in the afternoon.

Q.

You said Madam Witness, that your grandfather raped you at the back of your house between the hours of 4:00 to 5:00 p.m., how did your grandfather rape you?

A.

He undressed me, sir.

Q.

You said 'he undressed me,' tell us if your grandfather removed your clothes including your panty, is that what you mean?

A.

Yes, sir.

Q.

And what happened after Sergio Abon removed your clothes and your panty?

x x x

A.

He went on top of me and he raped me.

x x x.[8]

Q.

x x x what do you mean by 'he raped you'?

A.

Sergio Abon undressed me then he was on top. What I meant by 'he raped me,' he put his penis on my private part, sir.

x x x

Q.

What do you mean by your alleged testimony that Sergio Abon put his penis inside your private part?

A.

When he was on top of me he put his penis inside my vagina.

Q.

And what did he do after he put his penis inside your vagina?

A.

He pushed and pulled. (Witness demonstrating the motion of pumping, moving up and down, push and pull).

Q.

How long did the accused make a push and pull or pumping motion?

A.

Quite short time, sir.

Q.

And what did you do when the accused was making the pumping motion of push and pull motion while he was on top of you and his penis was inside your vagina?

A.

He was holding my hand and he was on top of me. I was pushing him but he was strong.

Q.

What happened after that?

A.

He dressed up before he left the place.

Q.

What did you feel after you experienced his penis inside your vagina and made a pumping motion and after the accused dressed up?

A.

I felt pain and felt dizzy, sir.

x x x."[9]

During the cross-examination, AAA never wavered in her assertion that appellant raped her; that during the act, he placed his bolo on her neck; and that he threatened to oust her and her brother from his house, thus:

"Q.

Last time also Madam Witness, you testified that your grandfather Sergio Abon raped you at the back of your house, my question is, what particular place at the back of your house were you raped by your grandfather, the accused herein?

A.

Right at the back of the house and sometimes inside our house, sir.

Q.

How many times were your raped by your grandfather?

A.

He raped me once, sir.

x x x

Q.

Now, you also said that your grandfather undressed you, where did your grandfather undress you?

A.

In the fields, sir.

Q.

Will you demonstrate before this Honorable Court how your grandfather undressed you or how he removed your clothes?

A.

When I was then standing picking up mango fruits, my grandfather removed my shorts.

Q.

How did he remove your shorts Madam Witness, will you please demonstrate to us?

A.

When I was standing, he suddenly pulled down my shorts and then suddenly, he drew his `panabas' and pointed it to me.

x x x

Q.

And after your grandfather pulled down your shorts with garter, will you demonstrate to us the other things that happened?

A.

He just told me to lie down and when I asked him what is he doing, he just replied `just lie down' and I was then crying.

x x x

Q.

x x x, when you lied down, where was your grandfather Sergio Abon?

A.

He went on top of me, sir.

x x x

Q.

Now, what was the appearance of your grandfather when he went on top of you?

A.

He touched my breasts, sir.

Q.

Was that the only thing he did to you, Madam Witness?

A.

He then told me to hold his penis.

Q.

Did you touch his penis, Madam Witness?

A.

I did not touch his penis, sir. But he placed his 'panabas' on my neck, forcing me to hold his penis.

x x x

Q.

And when your grandfather went on top of you, what did he tell you while he was on top of you?

A.

He told me not to tell to anybody what happened or else he threatened that my brother and I will be kicked out of his house.

x x x.[10]

Certainly, a rape victim's testimony is entitled to great weight especially when she accuses a close relative of having ravished her.[11] For there can be ascribed no greater motivation for a woman abused by her own kin than that innate yearning of the human spirit to declare the truth to obtain justice.[12]

However, appellant insists that he could not have committed the crime considering that AAA admitted during the cross-examination that she stayed with her aunt Remedios Novido in Manila from December, 1994 up to March, 1995, in effect negating the trial court's finding that she was sexually abused by appellant at Binalonan, Pangasinan sometime in January, 1995.

The exact time or date of the commission of rape is not an element of the crime. What is decisive is that the commission of rape by the accused has been sufficiently proved. Inconsistencies and discrepancies as to minor matters irrelevant to the elements of the crime cannot be considered grounds for acquittal.[13] In this case, the alleged inconsistency in AAA's testimony regarding the exact date and place of the commission of rape does not impair her credibility.

In fact, no less than xxxxxxxxxxxx, AAA's brother, testified categorically that he saw appellant having sexual intercourse with his sister on the day in question, thus:

"x x x

Q.

Do you recall of any incident that happened to your sister AAA sometime in January 1995?

A.

Yes, sir.

Q.

What was that incident that happened to your sister?

A.

She was raped, sir.

Q.

You said your sister AAA was raped, who raped her?

A.

Sergio Abon, sir.

Q.

You claimed that your sister AAA was raped by the accused Sergio Abon, where did Sergio Abon rape your sister?

A.

At the back of our house, sir.

Q.

What time did the accused rape your sister?

A.

In the afternoon, sir.

Q.

You said your sister was raped at the back of your house, where in particular in that place?

A.

Near the place where we are taking rice, sir.

Q.

Where were you at the time when AAA was being raped by the accused Sergio Abon?

A.

I was at the mango tree, sir.

Q.

Why were you at the mango tree at that time?

A.

I was hiding, sir.

Q.

How far is that mango tree where you were hiding to the place where your sister AAA was raped by the accused?

A.

Maybe at the door of the courtroom from the witness stand [witness indicating a distance of more or less eight (8) meters].

x x x

Q.

You said you witnessed the incident, will you tell us how Sergio Abon raped your sister AAA?

A.

When Sergio Abon asked me to buy cigarette I heeded his order and I bought cigarette and upon returning I saw Sergio Abon on top of my sister, so I hid behind the mango tree because I was afraid to go near them, sir.

Q.

What was the physical appearance of Sergio Abon when he was raping your sister AAA?

A.

He was naked, sir.

Q.

How about your sister?

A.

She was naked too, sir.

Q.

When you saw the accused Sergio Abon naked and you also saw your sister naked what did Sergio Abon do to your sister?

A.

She was raping my sister, sir. He was having sex with my sister, sir.

Q.

How did your grandfather have sex with your sister? Was your sister lying down at the time when she was being raped by your grandfather, the accused?

A.

Yes, sir.

Q.

And when you said Sergio Abon had sex with your sister, the accused was on top of your sister?

A.

Yes, sir.

Q.

How many times did your grandfather Sergio Abon rape your sister?

A.

Only one time, sir.

xxx."[14]

But appellant discredits the above testimony because xxxxxxxx retracted. A mere retraction by a prosecution witness does not necessarily vitiate the original testimony if credible.[15] The rationale for the rule is obvious: Affidavits of retraction can easily be secured from witnesses, usually through intimidation or for a monetary consideration. Moreover, recanted testimony is exceedingly unreliable. There is always the probability that it will later be repudiated.[16]

On appellant's contention that the results of the physical examination on AAA belie the charge that the crime was committed sometime in January, 1995, suffice it to state that Dr. Obedoza, emphatically testified that the old healed hymenal lacerations were "more than two to three weeks old"[17] from the date of examination.

The alleged ulterior motive of AAA in testifying against his grandfather also deserves scant consideration. As correctly observed by the Solicitor General:

"Appellant argues that AAA filed a rape complaint against him because of ill feelings, hatred and jealousy against him and his wife who tried to discipline her to be a good child, but AAA however, refused to be disciplined and was stubborn and hard-headed.

"x x x

"Even when consumed with revenge, it takes a certain amount of psychological depravity for a young woman to concoct a story of defloration, which would put her grandfather's liberty and life in peril and drag herself to a lifetime of shame. (People vs. Sangil, 276 SCRA 532; People vs. Silvano, G.R. No. 127356, June 29, 1999)."[18]

Appellant also submits that the unreasonable delay of 240 days or 8 months in reporting the rape incident to the authorities evinces that the charge is a mere fabrication.

We are not convinced. The Solicitor General prudently observed:

"When the rape happened, AAA was a 13-year old unsophisticated barrio lass who was living with appellant and dependent upon him for support. At first, she admitted the commission of the rape to xxxxxxxxxx when the latter confronted her. The morning after the rape incident, she revealed the same to her grandmother, wife of appellant, but her grandmother would not believe her.

"After AAA fled her grandparents' house, she reported the rape to her aunt, xxxxxxxx, who immediately accompanied her to the police authorities and to a physician for gynecological examination.

"Considering the foregoing, there was therefore no unreasonable delay in revealing the molestation to the police authorities. AAA immediately reported the same to a relative (grandmother) who did not mind the same probably because of the scandal it might create. The delay in reporting the matter to the police was caused by the grandmother's refusal to believe AAA's account of rape. Indeed, it would be quite unnatural for a 13-year old unsophisticated barrio lass to go straight to the police authorities to reveal the defloration which her grandfather did to her."

And so, complainant's delay in divulging what she knows, such as the identity of the offender, is not by itself a

setback to the probative value of her testimony.[19] To reiterate, what is important is that there is nothing to indicate that AAA had any improper motive to implicate appellant. Here, a young girl's revelation that she had been raped, coupled by her voluntary submission to medical examination and willingness to undergo public trial where she gave out the details of the assault on her dignity, cannot be easily dismissed as mere concoction.

In *People vs. Ocumen*,[20] we emphasized that "the qualifying circumstances of minority and relationship must concur. As these circumstances, if proven, raise the penalty of the crime to death, great caution must be exercised in their evaluation. For these circumstances to be appreciated, both must be specifically alleged in the Information and duly proved during the trial with equal certainty as the crime itself.

Here, it is undisputed that the minority of the victim - that she was 13 years old when she was raped in January 1995 - and appellant's relationship with the victim - that he is complainant's grandfather - have been alleged in the Information.

But, were these qualifying circumstances of minority and relationship sufficiently established during the trial?

The prosecution has duly established that appellant is the grandfather of AAA.[21] The appellant himself, in his direct testimony, categorically admitted that AAA is his granddaughter, she being the daughter of his son Nelson.[22]

However, the prosecution failed to prove that AAA was 13 years old when she was raped. No certificate of live birth or any authentic document was presented and offered in evidence to prove her age. The fact that there was no objection from the defense regarding her age could not be taken against appellant since it is the prosecution that has the burden of proving her age.[23]

Thus, in the absence of sufficient proof of AAA's minority, appellant cannot be convicted of qualified rape and sentenced to suffer the death penalty. He should only be convicted of simple rape and meted the penalty of reclusion perpetua.

As regards the civil liability of appellant, the trial court's award of P50,000.00 as moral and exemplary damages is erroneous.

In line with current jurisprudence, where, as here, the death penalty is not imposed, the victim should be entitled to P50,000.00 as indemnity ex delicto. Such award is mandatory upon the finding of the fact of rape.[24] We likewise award the victim moral damages which is fixed at P50,000.00 without need of pleading or proof of basis thereof.[25] In addition, exemplary damages of P25,000.00 is awarded to deter grandfathers with aberrant sexual behavior.[26]

WHEREFORE, the Decision of the Regional Trial Court, Branch 47, Urdaneta, Pangasinan, in Criminal Case No. U-8671, is hereby AFFIRMED with MODIFICATION in the sense that appellant Sergio Abon y Esteban is found guilty beyond reasonable doubt of simple rape and is sentenced to suffer the penalty of reclusion perpetua. He is ordered to pay the victim, AAA, P50,000.00 as civil indemnity; P50,000.00 as moral damages; and P25,000.00 as exemplary damages.

Costs de officio.

SO ORDERED.

Davide, Jr., C.J., Bellosillo, Puno, Vitug, Panganiban, Quisumbing, Carpio, Austria-Martinez, Carpio-Morales, Callejo, Sr., Azcuna, and Tinga, JJ., concur.
Ynares-Santiago, J., on official leave.

Corona, J., on leave.

[1] Penned by Judge Meliton G. Emuslan.

[2] Rollo at 15.

[3] Transcript of Stenographic Notes (TSN), March 13, 1996 at 4.

[4] Exhibit "C", TSN, June 17, 1996 at 10-11.

[5] Rollo at 36.

[6] "An Act To Impose The Death Penalty On Certain Heinous Crimes, Amending For That Purpose The Revised Penal Code, As Amended, Other Special Penal Laws, And For Other Purposes," which took effect on December 31, 1993.

[7] People vs. Ruben Dalisay, G.R. No. 133926, August 6, 2003, citing People vs. Agustin, 365 SCRA 667 (2001).

[8] TSN, March 6, 1996 at 3-10.

[9] TSN, March 13, 1996 at 1-3.

[10] TSN, April 29, 1996 at 10-18.

[11] People vs. Ruben Dalisay, supra at 14, citing People vs. Sagarino, 364 SCRA 438 (2001).

[12] Id.

[13] People vs. Artemio Invencion y Soriano, G.R. No. 131636, March 5, 2003.

[14] TSN, January 29, 1996 at 5-9.

[15] Virgilio Santos vs. People, G.R. No. 147615, January 20, 2003, citing People vs. Dulay, 217 SCRA 103 (1993).

[16] Id., citing Lopez vs. Court of Appeals, 239 SCRA 562 (1994).

[17] TSN, June 17, 1996 at 24.

[18] Appellee's Brief, Rollo at 252-253.

[19] People vs. Victor Balili y Libot, G.R. No. 125908, September 5, 2002.

[20] G.R. No. 135559, September 17, 2003, citing People vs. Padilla, 355 SCRA 741 (2001).

[21] TSN, March 6, 1996 at 3; January 29, 1996 at 4.

[22] TSN, November 14, 1996 at 7-8.

[23] People vs. Ruben Dalisay, supra at 18.

[24] People vs. Escano, G.R. Nos. 140218-23, February 13, 2002; People vs. Arizapa, G.R. No. 131814, March 15, 2000, 328 SCRA 214.

[25] People vs. Baroy, G.R. Nos. 137520-22, May 9, 2002.

[26] People vs. Ruben Dalisay, supra at 19, citing People vs. Salalima, 363 SCRA 193 (2001) and People vs.

Docena, 379 Phil. 903 (2000).

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.