

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. ANTHONY ESTRELLA Y IGNACIO, ACCUSED-APPELLANT.

G.R. No. 132322. February 23, 2001

Ponente: KAPUNAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-132322/>

KAPUNAN, J.:

Anthony Estrella (accused-appellant) appeals the decision, promulgated on November 18, 1997, of the Regional Trial Court of Manila, Branch 26, finding him guilty of the crime of Rape and sentencing him to suffer the penalty of reclusion perpetua and to indemnify private complainant the sum of fifty thousand pesos as damages.

The Information filed against accused-appellant reads as follows:

The undersigned upon sworn statement filed by the offended party MA. CRISTINA R. GLORIA attached herewith as Annex "A" accuses ANTHONY ESTRELLA Y IGNACIO of the crime of Rape, committed as follows:

That on or about June 2, 1994, in the City of Manila, Philippines, the said accused did then and there willfully, unlawfully and feloniously, have carnal knowledge with the undersigned complainant, minor, 9 years of age, by then and there lying on top of her in a bed and thereafter removing her panty, kissing her and inserting his penis into her private parts, and thereafter also inserted his finger then succeeded in having carnal knowledge of her, against her will and consent.[1]

At his arraignment on August 1, 1994, accused-appellant pleaded not guilty.[2] Thereafter, trial ensued.

The prosecution's version of the facts is as follows:

At around 10:00 p.m. of June 2, 1994, complainant, Maria Cristina R. Gloria, who was then 9 years old and a Grade I student, was requested by her father to buy cigarettes at a store near their house.[3] On her way back to her house at around 10:30 p.m., while passing through an alley, accused-appellant, who was then behind her, called her attention.[4] She was able to recognize accused-appellant, a former neighbor, because the alley was lighted.[5] He approached her and said: "Pango, sumama ka sa akin." Accused-appellant then held her tightly by the hand and led her to his house nearby. Upon reaching his house, accused-appellant took off her clothes and, thereafter, undressed himself. He forcibly laid her on the bed and began to insert his organ into her most private part. He, however, failed to penetrate her vagina.[6] Accused-appellant then introduced his finger into her organ and made in and out movements with his hand. This made the victim cry as she felt pain. He then said to her: "Pango, ikaw lang ang batang nasa isip ko." [7] After inserting his finger into her organ for sometime, accused-appellant again tried to insert his penis into her vagina. However, accused-appellant still failed to insert his penis. Accused-appellant stopped his efforts to have coitus and re-inserted his finger into her organ.[8] After taking out his finger from her vagina, Cristina told her: "Kuya, uuwi na ako. Hinahanap ako ng nanay ko." Unmindful, accused-appellant told her that she will leave later and again tried to insert his penis into her organ two more times but his efforts were in vain. Thus, he persisted in inserting his finger into her private part four more times. Eventually, accused-appellant allowed complainant to go home. Cristina went out of his house and

cried while walking home. However, before she could reach her house, she saw her mother who was then looking for her and shouting "Pango! Pango!"[9] She approached her mother and told her of the harrowing ordeal she experienced in the hands of accused-appellant. Angered, her mother brought her to the house of accused-appellant. Upon reaching the said house, her mother shouted: "Anthony, lumabas ka dyan. Hayop ka!"[10] They stayed there for an hour but accused-appellant did not come out of his house.[11] Disturbed by the commotion, neighbors started going out of their houses. Suddenly, accused-appellant kicked the door of his house and emerged therefrom holding a knife. Cristina's grandfather, Jose, then entered accused-appellant's house and was nearly stabbed by accused-appellant.[12] Accused-appellant then ran out of his house which led the barangay tanods to run after him. When accused-appellant was caught by the barangay tanods, he was mauled and held on his hands and feet. Accused-appellant was then brought to the police station.[13]

The following day, or on June 3, 1994, Cristina was brought to the Philippine General Hospital (PGH) for an examination. The examining physicians, Drs. Luna and Bermudez, accomplished a Gynecologic Emergency Sheet[14] where it was noted that there was negative bleeding but there was erythematous in the labial fold.

Three days thereafter, or on June 6, 1994, Dr. Mylene Pinggol of the Ob-Gyn department of the PGH examined the victim pursuant to the request of the pediatrics department. The examination was for the purpose of inspecting the patient's vulva and the internal genitalia for foreign body discharge or bleeding.[15] Accordingly, Dr. Pinggol issued a medical report where she noted the following findings:

- normal external genitalia
- (+) 0.2 cm. abrasion at the (L) paraurethral area
- (+) erythema (on same area)
- hymen intact
- (-) vaginal DIC/bleeding
- cervix pink (-) laceration[16]

Dr. Pinggol explained that her observation that there was a 0.2 cm. abrasion at the left paraurethral area meant that there was, using the vernacular, a "maliit na gasgas" of 0.2 cm. "around the opening where the urine comes out."[17] Furthermore, her finding that there was erythema in the same area meant that there was redness present in the 0.2 cm. abrasion.[18]

For his part, accused-appellant denied the accusations against him. However, he could not think of any reasons why Cristina would fabricate the accusation against him.[19] In his defense, accused-appellant claimed that at 10:30 p.m. of June 2, 1994, he was at his house sleeping.[20] Accused-appellant averred that in the early evening of that fateful day, he, along with Jr. Ignacio, a cousin, and Penggoy, a friend, were at a store to buy food. At around 8:00 p.m., they proceeded to his house to watch television.[21] While watching television, he fell asleep and awoke at around 11:00 p.m. when he noticed that someone kicked open the door of his house.[22] When this happened, Jr. Ignacio and Penggoy had already left his house.[23] The grandfather of Cristina then entered his house and tried to hack him with a bolo.[24] He was able to parry the blow and run out of his house towards the direction of a certain Chairman Mendoza. Before he could reach Chairman Mendoza, however, somebody held him by his neck and boxed him. He lost consciousness and when he regained his senses he was already in the Barangay Hall.[25] He was then brought to the police station where he was incarcerated.[26]

Accused-appellant admitted that he knew complainant since she and her family were former neighbors in an apartment.[27] In fact, accused-appellant claimed that Cristina's mother would borrow money from his mother in

times of need.[28]

After evaluation of the evidence presented by the prosecution and the defense, the trial court found accused-appellant guilty of rape. The dispositive portion of the trial court's decision reads:

WHEREFORE, PREMISES CONSIDERED, the prosecution having fully established the guilt of the accused beyond reasonable doubt, this Court finds him, ANTHONY ESTRELLA y IGNACIO, GUILTY beyond reasonable doubt of the crime of Rape under Article 335 of the Revised Penal Code, as charged in the information, and hereby sentences him to suffer the penalty of RECLUSION PERPETUA with all the accessory penalties provided by law; to indemnify the private complainant the sum of Fifty Thousand (P50,000.00) Pesos by way of moral damages; and to pay the costs of the suit.

SO ORDERED.[29]

Hence, this appeal where accused-appellant interposed a lone assignment of error, to wit:

THE COURT A QUO ERRED IN CONVICTING ACCUSED-APPELLANT ANTHONY ESTRELLA NOTWITHSTANDING THE FAILURE OF THE PROSECUTION TO PROVE HIS GUILT BEYOND REASONABLE DOUBT.[30]

Accused-appellant asserts that the victim's testimony was tainted with doubts and contradictions and, because of this, there was no clear and convincing proof upon which conviction could be based. Accused-appellant raises four (4) incongruities in Cristina's testimony which allegedly render doubtful her claim that she was raped.

First, accused-appellant highlights the fact that while complainant testified that she became suspicious of his motives in approaching her in the alley on the night of June 2, 1994, she did not bother to shout for help to get the attention of the residents nearby. This, according to him, is "very incredible and incredulous."

We do not agree. Even accused-appellant admitted that the victim knew him since they were former neighbors. This personal acquaintance could have understandably been the reason why she agreed to go along with accused-appellant to his house. One cannot expect an innocent nine-year old girl to make a scene in the street and alarm the neighborhood on the basis of a mere suspicion. More importantly, this alleged improbability in the victim's testimony refers to an event that happened prior to the actual commission of the crime of rape which does not, in any way, affect the substance of her accusation that she was ravished by accused-appellant.

Second, accused-appellant puts in issue Cristina's assertion that she cried during her ordeal when she was inside his house. According to accused-appellant, this claim is inconsistent with her testimony that her father passed by accused-appellant's house at the time that she was being raped but, despite this, was unable to hear her cries of anguish.

Whether Cristina cried when she was raped is inconsequential and irrelevant in the present controversy since what is involved herein is a case of statutory rape where the consent of the victim is immaterial in disproving the same.[31] Moreover, the failure of Cristina's father to hear her cries while she was being sexually abused in the house of accused-appellant could have been brought about by many factors. The walls of the house could have muffled the victim's cries, the other noises in the vicinity were probably too loud, thus, rendering her cries inaudible or complainant's father could have been preoccupied with other matters so as to be oblivious to the cries of his daughter.

Third, accused-appellant notes that the victim's father did not do anything even after he learned that his daughter had been raped. This, accused-appellant argues, is inconsistent with normal human behavior and, as such, only signifies that her father did not believe that his daughter was raped.

Again, we fail to see the import of this supposed inconsistency in the behavior of the victim's father to accused-appellant's claim of innocence. The less than passionate reaction of the father in his reception of the news that his daughter was raped is a matter which delves into the personality of said parent and is not determinative of the veracity of the girl's claim that she was sexually abused by accused-appellant.

Finally, accused-appellant makes much of Cristina's testimony that she did not categorically see that he inserted his penis into her vagina but that she only felt his penis when accused-appellant was trying to insert the same into her most private part. As basis thereof, accused-appellant quotes the following testimony of the victim during her cross-examination:

Q

Why did you say that his organ is bigger that is why it couldnot [sic] be inserted in your organ, were you looking at the organ of Anthony Estrella while he was trying to insert his organ to yours?

A

No ma'am.

Q

Why did you say that the organ of Anthony Estrella is big?

A

I could feel it, ma'am.[32]

According to accused-appellant, the lack of a definite assertion on this matter raises reasonable doubt on Cristina's allegation that she was raped since there is no proof that he took off his underwear and that his penis actually touched her vagina. Furthermore, this would explain why Cristina's medical examination revealed that she did not suffer any laceration and that her hymen was still intact.

We are not persuaded. A more comprehensive reading and appreciation of the cross-examination testimony of complainant would reveal that she made it clear that accused-appellant was no longer wearing his underwear when the latter was pursuing his prurient intentions towards complainant.

Q

Now you said that because Anthony Estrella was not able to insert his organ to yours he inserted his finger to your organ and made push and pull move of his finger?

A

Yes, ma'am.

Q

Why was he unable to insert his organ to your organ?

A

His organ is big.

Q

Very big?

A

A little bit bigger.

Q

When he tried to insert his organ into your organ at that precise moment what did you do, if any?

A

I was crying.

Q

Is that all you did?

A

Yes, sir.

Q

You did not box or push him?

A

I was kicking him.

Q

Now what happened when you kicked him?

A

He continued.

Q

Why did you say that his organ is bigger that is why it couldnot (sic) be inserted in you organ, were you looking at the organ of Anthony Estrella while he was trying to insert his organ to yours?

A

No ma'am.

Q

Why did you say that the organ of Anthony Estrella is big?

A

I could feel it, ma'am.[33]

It is apparent from Cristina's testimony that the reason why accused-appellant was unable to insert his organ into hers was because it was too big and not because he was still wearing his underwear. Had it been the latter situation, the complainant could have easily stated that the reason for accused-appellant's inability to achieve full sexual penetration was because he was still wearing his underwear.

Furthermore, the premise of the question asked of the victim was whether she actually saw the penis of accused-appellant while he was trying to insert the same into hers. This elicited an honest answer from her that

she did not see the actual insertion of the penis, for which she should not be faulted. Being a rape victim, it is understandably farthest from her mind to still endeavor to focus her attention on looking at the penis of her assailant while he inserted the same into her most private part. Obviously, all her strength, efforts and attention were directed towards fighting off the intrusion being made against her body and in making pleas for compassion and help.

The mere fact that the medical examination of the victim showed that there was no laceration of her hymen does not necessarily mean that she was not raped by accused-appellant. The legal significance of rape is different from its meaning as understood by laymen. As borne by jurisprudence, any degree of penetration, however slight, of the female organ by the male organ consummates the said crime. Perfect penetration is not essential in the crime of rape.[34] Thus, the mere touching by the male organ of the labia of the pudendum already constitutes rape. In *People vs. Campuhan*,[35] the Court discussed the anatomic description of the female organ in relation to the degree of touching of the labia required so as to constitute the consummated stage of rape. The Court said:

The pudendum or vulva is the collective term for the female genital organs that are visible in the perineal area, e.g., mons pubis, labia majora, labia minora, the hymen, the clitoris, the vaginal orifice, etc. The mons pubis is the rounded eminence that becomes hairy after puberty, and instantly visible within the surface. The next layer is the labia majora or the outer lips of the female organ composed of the outer convex surface and the inner surface. The skin of the outer convex surface is covered with hair follicles and is pigmented, while the inner surface is a skin which does not have any hair but has many sebaceous glands. Directly beneath the labia majora is the labia minora. Jurisprudence dictates that the labia majora must be entered for rape to be consummated, and not merely for the penis to stroke the surface of the female organ. Thus, a grazing of the surface of the female organ or touching of the mons pubis of the pudendum is not sufficient to constitute consummated rape.

We have carefully examined the records of this case and we hold that the evidence of the prosecution clearly established that accused-appellant's organ touched the labia majora of the victim's pudendum. Although accused-appellant's organ failed to fully penetrate the victim's vagina, there is no doubt that it (accused-appellant's sexual organ) touched her labia majora. Complainant testified on direct examination, thus:

PROS. SUPNET:

Q

On June 2, 1994 on or about 10:00 o'clock P.M., is it not true you were asked by your father to buy cigarettes for him?

WITNESS:

A Yes, sir.

Q And that place or the store you were asked to buy cigarettes is located along Capulong Street, Tondo, Manila?

A Yes, sir.

Q

Is it not true that after buying the cigarettes, in your way home while you were walking along an alley, you saw the accused Anthony Estrella?

A

No, sir, he was behind me and calling for me, sir.

Q When this Anthony Estrella was calling you from behind, what happened next, if any?

A I did not come near to him but he was the one who approached me, sir.

Q Is it not true that when Anthony Estrella approached you, he held your hand and told you in the vernacular, "Pango, sumama ka sa akin"?

A Yes, sir.

COURT

And [is] this Anthony Estrella known to you?

A Yes, sir.

COURT

You know him because you were neighbors?

A Yes, sir.

PROS. SUPNET:

Q Now, if he is present in Court, can you point to him?

WITNESS

A Yes, sir.

PROS. SUPNET

Q Point to him?

A

There. (Witness pointing to a person whom when asked his name answered by the name of Anthony Estrella, the accused in this case)

Q When the accused Anthony Estrella held your hand and told you to go with him, what did you do next, if any?

A None, sir.

Q What did he do, if any?

A He held me tightly, sir.

PROS. SUPNET

Your Honor, we would like to make it of record that the witness is crying.

COURT

Noted.

PROS. SUPNET

Q Where did Anthony Estrella bring you?

WITNESS

A He brought me to his house, sir.

Q Were you able to reach his house?

A Yes, sir.

Q When you reached his house, what happened next, if any?

A He undressed me and he also undressed himself, sir.

Q After the accused Anthony Estrella undressed you and he undressed himself, what happened next, if any?

A He held me and forcibly laid me in the bed, sir.

Q After accused Anthony Estrella laid you in the bed, what happened next, if any?

A He was forcing in inserting his penis into my organ but he did not succeed to penetrate, sir.

COURT

What did you do when he tried to insert his organ into your organ?

WITNESS

A When he could not insert his penis into my organ, he used his finger into my organ, sir.

COURT

And while he was doing that, do you know what did you do?

A I was crying, sir.

COURT

Why, why were you crying?

A Because I felt pain, sir.

PROS. SUPNET

Q

Did accused Estrella merely inserted [sic] his finger into your organ or was [sic] he also have some motions of push and pull?

WITNESS

A He pushed and pulled his finger into my organ, sir.

Q Aside from the push and pull of his finger into your organ, what did he do next, if any?

A He told me something, sir.

Q Tell the Court, what did he tell you?

A He told me, "Pango, ikaw lang ang batang nasa isip ko."

COURT

And when he said or when you heard the accused said, "Pango, ikaw lang ang batang nasa isip ko," what was your answer?

A I did not answer, sir.

COURT

How long did the accused do the act of inserting his push and pull of his finger into your sex organ?

A It lasted for quite sometime, sir.

COURT

For two minutes?

A I don't know for how many minutes or hours, sir.

COURT

After the accused did the act of inserting the finger into your sex organ, what else did he do, if any?

WITNESS

A After he inserted his finger into my sex organ, he tried this time to insert his penis into my organ, sir.

COURT

Did he succeed in inserting his organ into your organ?

A No, sir.

COURT

How many times did he insert his penis into your organ, if you remember?

A About two (2) times, sir.

COURT

After inserting his penis into your sex organ for two (2) times, what else did he do, if any?

A No more, sir.

COURT

What about as accused Anthony Estrella tried to insert his penis into your organ for two times, on your part, what did you do, if any?

A I was crying, sir.

COURT

Why were you crying?

A I felt pain, sir.

PROS. SUPNET

After the accused failed to insert his penis into your organ, what else did he do? Did he dress up?

WITNESS

A No, sir.

Q What else did he do, if any?

A He stopped inserting his penis into my organ and started inserting his finger into my sex organ again, sir.

COURT

How many times?

A About four (4) times, sir.

COURT

After inserting his finger into your sex organ for four (4) times, what else did he do, if any?

WITNESS

I told him something, sir.

COURT

What did he tell you, if any?

A I told him, "Kuya, uuwi na ako. Hinahanap na ako ng nanay ko."

COURT

After saying, "Kuya uuwi na ko. Hinahanap na ako ng nanay ko", what did he do, if any?

A He told me to go later, sir.

COURT

Did you follow him?

A No, sir.

COURT

Since you did not follow him, what did you do, if any?

A He did not mind me and again inserted his finger into my organ, sir.

COURT

How many times did he insert his finger into your organ?

A Many times and it took sometime, sir.

COURT

After sometime of inserting his organ into your organ, what else did he do, if any?

A He sent me home, sir.

COURT

Did he not insert his organ into your organ?

A Not anymore, sir.

COURT

When he told you to go home, what did you do, if any?

A

I went out of his house, walked along the highway on my way home crying, sir.[36]

From the foregoing narration, it can be logically concluded that when accused-appellant repeatedly attempted to insert his penis into the victim's vagina, his penis touched the middle part of her sexual organ and penetrated the labia of the pudendum. It is impossible for the penis of accused-appellant not to touch the labia of the pudendum in trying to penetrate her.[37] If it did not go the full length and he was not able to attain full penetration, it was not because he did not try to have intercourse with her but because the victim, being still a virgin, required stimulation. That was the reason accused-appellant "fingered" her private part, apparently to arouse her.[38] Accused-appellant's acts constitute, in a manner of speaking, the bombardment of the drawbridge which is invasion enough even if the troops do not succeed in entering the castle.[39]

Moreover, both the Gynecologic Emergency Sheet[40] and the medical report issued by Dr. Pinggol[41] revealed that there was erythematous in the labial fold or, more exactly, a redness of 0.2 cm. at the paraurethral area (the area where the urine comes out). This observation signifies that accused-appellant inserted his penis into complainant's vagina and, in the process, partially entered and rubbed against the labia majora of her pudendum. However, despite his efforts, his "big organ" failed to achieve full penetration which, thus, accounts for the pain experienced by complainant and the non-observation of lacerations or ruptures in complainant's hymen.

In the case of *People vs. Orita*,[42] the medical certificate of the rape victim showed that the latter's hymen was still intact but there was erythematous found in the vaginal orifice. Considering these medical findings coupled with the victim's testimony that her defiler inserted his penis into her vagina, the accused therein was convicted of the crime of rape. Similar to *Orita*, accused-appellant's efforts at forcibly fornicating with his victim did not produce any laceration to her hymen but resulted in redness or erythematous in the labia majora of the victim's genitalia. This shows partial penal penetration for which accused-appellant must still be made to suffer the penalty for the consummated crime of rape due to the slight penetration of his organ into the labia of complainant's pudendum.

All told, therefore, we consider as futile the attempts of accused-appellant to raise doubts as to the testimony of the complainant. No nine-year old girl would concoct a rape complaint, allow a gynecologic examination of her most private part and permit herself to be subjected to a public trial if she is not motivated solely by the desire to have her defiler punished. The absence of any motive on the part of the victim together with her convincing testimony, erases any doubt as to the guilt of accused-appellant.

The trial court correctly awarded Fifty Thousand (P50,000.00) Pesos as moral damages. However, in line with recent jurisprudence, an additional amount of Fifty Thousand (P50,000.00) Pesos should also be awarded as civil indemnity. This is in accord with our ruling in *People vs. Prades*[43] where we stated that civil indemnity is mandatory upon a finding of the fact of rape and that the same is distinct from and should not be denominated as moral damages which are based on different jural foundations and assessed by the court in the exercise of sound discretion. Thus, in the subsequent case of *People vs. Bugayong*,[44] where we found the accused guilty of statutory rape against a ten (10) year old girl, we modified the civil damages awarded by the trial court and ordered the accused to pay the victim the amount of Fifty Thousand (P50,000.00) Pesos as civil indemnity and an additional amount of Fifty Thousand (P50,000.00) Pesos as moral damages.

WHEREFORE, the judgment of the trial court promulgated on November 18, 1997, finding accused-appellant ANTHONY ESTRELLA y IGNACIO guilty beyond reasonable doubt of the crime of Rape and sentencing him to suffer the penalty of reclusion perpetua, is hereby AFFIRMED, with the modification to pay the offended party Maria Cristina R. Gloria the sum of Fifty Thousand (P50,000.00) Pesos as moral damages and the additional

amount of Fifty Thousand (P50,000.00) Pesos as civil indemnity. Costs against accused-appellant.

SO ORDERED.

Davide, Jr., C.J., (Chairman), Puno, Pardo, and Ynares-Santiago, JJ., concur.

[1] Records, p. 1.

[2] Id., at 12.

[3] TSN, October 24, 1994, pp. 3-5.

[4] Id., at 5.

[5] Id.; TSN, November 28, 1994, p. 4.

[6] TSN, October 24, 1994, p. 6.

[7] Id., at 7.

[8] Id., at 8.

[9] Id., at 9.

[10] Id., at 10

[11] Id., at 10-11.

[12] Id., at 11.

[13] Id., at 12.

[14] Exhibit "B," Records, p. 87.

[15] TSN, August 21, 1994, p. 4.

[16] Exhibit "D," Records, p. 89.

[17] TSN, August 21, 1994, p. 6.

[18] Ibid.

[19] TSN, March 25, 1996, p. 3.

[20] Id., at 3-4

[21] Id., at 4.

[22] Id., at 5.

[23] Id., at 11.

[24] Id., at 5.

[25] Id., at 6.

[26] Id., at 7.

[27] Id., at 8-9.

[28] Id., at 9.

[29] See Note 1, p. 157; Rollo, p. 20.

[30] Rollo, p. 27.

[31] People vs. Henson, 270 SCRA 634, 644 (1997).

[32] TSN, November 28, 1994, p. 6.

[33] Id., at 5-6. Underscoring supplied.

[34] People vs. Escobar, 2 G.R. No. 129433, March 30, 2000.35 81 SCRA 498, 506 (1997); People vs. Sanchez, 250 SCRA 14, 24 (1995).

[35] G.R. No. 129433, March 30, 2000.

[36] Supra, note 3, at 5-9.

[37] People vs. Clopino, 290 SCRA 432, 443 (1998).

[38] Id., at 442.

[39] Supra, note 34, at 597.

[40] Supra, note 14.

[41] Supra, note 16.

[42] 184 SCRA 104 (1990).

[43] 293 SCRA 411(1998).

[44] 299 SCRA 528 (1998).

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.