

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. CRISANTO BAULA, RUBEN BAULA, ROBERT BAULA AND DANILO DACUCOS, ACCUSED-APPELLANTS.

G.R. No. 132671. November 15, 2000

Ponente: VITUG, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-132671/>

VITUG, J.:

In an Information, dated 07 August 1996, accused-appellants were charged with murder before the Regional Trial Court, Branch 38, of Lingayen, Pangasinan. The accusatory portions of the Information against the indictes read:

"That on or about the 13[th] day of December 1995, in the evening, in barangay Sioasio West, Municipality of Sual, Province of Pangasinan, Philippines and within the jurisdiction of this Honorable Court, the above-named accused, conspiring, confederating and mutually helping one another, armed with a bolo (tabas), with abuse of superior strength, treachery and evident premeditation and intent to kill, did then and there willfully, unlawfully and feloniously attack, assault and stab Patrocenia Caburao, inflicting upon her the following:

"1. Hacking wound - 3 inches in length; 2 inches deep Rt. Occipital region (nape area) exposing brain tissue;

"2. Hacking wound - 4 inches in length; 2 inches deep at mid occipital area exposing damage brain tissue;

"3. Hacking wound - 4 inches in length; 1/2 inch deep facial area running across the Rt. Cheek and left cheek including the nasal area;

"4. Hacking wound - 2 inches in height; 1 inch deep at the vertex (top of the head);

"5. Abrasion; confluent at the back area.

"Cause of death - Brain tissue injury secondary to mortal wounds above which injuries directly caused her death, to the damage and prejudice of the heirs of the said Patrocenia Caburao.

"Contrary to Art. 248 of the Revised Penal Code."[1]

When arraigned, the accused all entered a plea of not guilty to the offense charged. Trial shortly thereafter ensued.

The relevant facts and events that transpired, according to the prosecution, were briefly narrated in the People's Brief.

On 13 December 1995, at around eight o'clock in the evening, Jupiter Caburao, decided to follow his mother, Patrocenia Caburao, who had earlier left their house at Barangay Siwasiw West, Sual, Pangasinan, to settle her due obligations at a store, about one-and-a-half kilometers away, owned by a certain Brigida Tumamang. While traversing the road towards the store, Jupiter noticed a commotion near the creek about ten meters away from him. He focused his flashlight towards the direction where he heard the commotion and saw accused-appellants Crisanto Baula and Danilo Dacucos in the act of hacking a person who was lying on the ground, while

accused-appellants Robert Baula and Ruben Baula stood as lookouts. The assault lasted for about four minutes. Accused-appellants fled but not before they had threatened Jupiter with death if he were to divulge the incident to anyone. Jupiter went near the lifeless body of the victim who turned out to be his own mother. Her head and face sustained four hacking wounds, two of which damaged her brain tissues. Jupiter rushed home and brought his niece and nephew to the house of a neighbor for their safety. For fear of reprisal from accused-appellants and believing that the police would be able to solve the gory killing on their own, Jupiter did not reveal the carnage to either his relatives or the police.

About two o'clock in the morning of 14 December 1995, the police authorities, led by SPO4 Fermin Mirande, went to the locus criminis, and took pictures of the body of the victim.[2] The investigation revealed that before the victim was killed, she had been to Brigida Tumamang's store; that accused-appellants were also at the store having a drinking spree; that the victim left the store between seven o'clock and eight o'clock in the evening, and that, fifteen minutes later, accused-appellants also left.

SPO4 Mirande, with several policemen, repaired to the respective houses of accused-appellants. The policemen asked Ruben Baula and Crisanto Baula for the clothing they wore on the night of the murder. Ruben Baula gave his bloodstained pair of short pants, and Crisanto Baula turned over his bloodstained polo shirt. The policemen next went to the hut of Danilo Dacucos. Inside the hut, the group found hanging on the wall a bloodstained bolo. The bloodstained pair of short pants, polo shirt and bolo, together with the victim's dried blood samples,[3] were sent on the same day to the National Bureau of Investigation, Dagupan City Branch Office,[4] for forensic examination. The results of the examination[5] disclosed that the bloodstains[6] found in the bolo,[7] the bloodstains[8] on the polo shirt[9] and the bloodstains[10] on the pair of short pants[11] had the same type "O" blood as that of the victim.

The defense had another version of the incident.

Wilson Radovan, the barangay captain of Siwasiw, Sual, Pangasinan, testified that on 13 December 1995, at around eight o'clock in the evening, while he and the other barangay officials were at their outpost, they heard the cry of a woman asking for help. Rushing out, they saw Teofila Uson, a barangay mate, who told them that she and Patrocinia Caburao were being pelted with stones. Teofila Uson said that it was too dark to be able to identify the person who had attacked them. When the group proceeded to the place of the incident, they saw the lifeless body of Patrocinia Caburao, beside the road, near the creek. Radovan testified that he did not notice any other person in the place where the incident occurred. He requested Gene Macatiao, the son-in-law of the victim and one of those who first arrived in the scene, to inform their relatives and the police.

Ruben Baula testified that in the morning of 13 December 1995, he, together with his co-accused and other companions, namely, Pepito Ramos, Amber Pagudpod, Francis Amistad and Reny, were harvesting palay, at Sitio Binabalian, Siwasiw West, Sual, Pangasinan, on the land being tenanted by Crisanto Baula. He recounted that they were there until 4:55 in the afternoon at about which time Crisanto Baula invited the group to eat "merienda" in the nearby canteen of Brigida Tumamang. He noticed that when they arrived at the store, there were three other persons partaking of drinks. At about twilight, they left the store of Brigida Tumamang and proceeded to their respective residences, leaving behind the three persons who continued with their drinking spree. At about three o'clock in the morning of 14 December 1995, while he was asleep, four policemen and several barangay officials arrived and asked him if he knew who had killed Patrocinia Caburao. Although he denied any knowledge about the killing, the policemen, nevertheless, invited him to accompany them to the house of Robert Baula. Arriving thereat, the policemen likewise questioned the latter about the killing of Patrocinia Caburao. Robert Baula, like his co-accused Ruben Baula, denied any knowledge of the killing. After the interrogation, the police authorities allowed them to go. Ruben and Robert Baula both vehemently denied that the police ever took any clothing from

them.

Accused-appellants, Crisanto Baula and Danilo Dacucos, corroborated the testimony of their co-accused, Ruben and Robert Baula, in its material points, claiming that in the morning of 13 December 1995, they went to Sitio Binabalian to harvest palay; that in the afternoon, they took their merienda at the store of Brigida Tumamang; and that, thereafter, they went home leaving behind the three persons still indulging in drinks at the store of Brigida Tumamang.

The trial over, the court a quo rendered its judgment on 17 November 1997, convicting accused-appellants of the crime charged; thus:

"WHEREFORE, in view of the foregoing premises, judgment is hereby rendered finding the accused Danilo Dacucos, Crisanto Baula, Ruben Baula and Robert Baula, guilty beyond reasonable doubt of the crime of Murder defined and penalized under Article 248 of the Revised Penal Code as amended.

"Pursuant thereto and in relation to Article 63, paragraph 2, No. 2 of the same code, all the aforementioned accused are hereby sentenced to suffer the penalty of Reclusion Perpetua and to pay, jointly and severally, the heirs of Patrocinia Caburao the following:

"a. P50,000.00 for the death of Patrocinia Caburao;

"b. P15,000.00 for funeral expenses;

"c. moral damages of P75,000.00;

"d. to pay proportionally the costs.

"SO ORDERED." [12]

Accused-appellants contend in the instant appeal that the trial court has erred (1) in giving full credence to the belated eyewitness account of Jupiter Caburao ascribing to herein accused-appellants authorship of the crime, and (2) in admitting in evidence the bolo, polo shirt, and short pants taken by the policemen from accused-appellants in violation of their constitutional rights.

In convicting accused-appellants, the trial court found the explanation of Jupiter for his delay in reporting what he knew of the gruesome killing not to be without valid reasons. After all, the court said, he was threatened and he felt that the authorities could solve the crime even without revealing what he knew.

True, the rule has generally been that where the culpability or innocence of an accused hinges on the issue of credibility of witnesses and the veracity of their testimony, the assessment made by the trial court thereover is entitled to a great degree of respect and, absent strong justifications to the contrary, it will not be disturbed on appeal. [13] The reason is simple. A trial court gets an opportunity, not equally open to an appellate court, to observe the expression of witnesses at the stand, including their demeanor under questioning, that makes up a most significant factor in the proper evaluation of testimonial evidence. Obviously, however, this rule will not apply where one judge hears the testimony of the witnesses and another judge pens the decision for, in such a case, the thesis for the rule is not in the least extant. [14]

In the case under review, such as in *People vs. Capilitan* [15] and *People vs. Villapana*, [16] the decision was rendered by the judge who did not conduct the trial and hear the evidence. The Court in acquitting Capilitan of rape, quoted with approval its previous pronouncement in Villapana similarly acquitting the accused therein, viz:

"Additionally, we have to take note that in this case, the judge who heard the evidence for the prosecution is not the same judge who decided the case. It was Judge Serafin Salvador who heard the testimonies of complainant and her witness before his retirement. Whereas, it was Judge Romulo Quimbo who decided the

case relying solely on the transcripts of stenographic notes in appreciating Macaranas' and her witness' testimonies. Even as this Court has consistently been guided by the precept that findings of trial courts on credibility of witnesses are accorded great weight and must not be disturbed as it was the trial judge who had the opportunity to observe the demeanor of the witnesses while they were testifying, this case should be an exception in view of the fact that the Judge who decided the case is NOT the same judge who heard the evidence (see *People vs. Escalante, et al.*, G.R. No. L-371457, August 22, 1984, 131 SCRA 237). Thus, the Court should all the more exercise utmost care in evaluating the evidence presented in the instant case so as to render justice not only to the accused, but also to the complainant and the State as well."^[17]

Here, it was Judge Antonio M. Belen who heard the testimony given at the trial, but it was Judge Emilio V. Angeles who wrote the decision, dated 17 November 1997, solely on the basis of the records of the case. Having neither personally heard the testimony of the witnesses nor observed their deportment and manner of testifying, his assessment on the credibility of witnesses would have to be received with caution on appeal.^[18]

Verily, it is not uncommon for a witness to show some reluctance about being immersed in a criminal case. The natural reticence of most people to "get involved" is, in fact, of judicial notice.^[19] Thus, it is recognized that the delay or vacillation in making a criminal accusation does not necessarily impair the credibility of witnesses for, more often than not, such a delay can be satisfactorily explained.^[20]

In this instance, however, the Court cannot help but doubt as being highly suspect, the belated revelation of Jupiter on the identity of the assailants. His claim that he did not immediately report the matter to the police relying on a supposition that the crime could anyway be solved even without his own disclosure appears to be a bit flimsy. Unlike previous cases where we have ruled otherwise, Jupiter is not just an innocent bystander but the son of the victim. The raging passion and anger of a son who has just lost a mother in such a brutal manner would have impelled him to immediately report the crime to the authorities even with an alleged threat upon his life.

It can be accepted that there is yet no real test or a hard and fast rule in ascertaining the truth of the testimony of a witness to an accurate degree. Nevertheless, testimony that conforms to human knowledge, observation, and experience is often deemed reliable and that which is repugnant to such standards belongs to the miraculous and outside of judicial cognizance.^[21] The Court finds that Jupiter's response to the events is far from the natural reaction of a son who has just witnessed the grisly murder of his own mother. What he has said to have done is simply not in accord with human nature. With all the bitterness and indignation expected of a person similarly situated, it is quite odd that he would keep the matter to himself and fail to disclose his knowledge of the crime to the police authorities, or even to any of his relatives, despite his presence during their investigation of the case. His belated declaration of the identity of his mother's assailants, some two months after the killing, can but accentuate the difficulty that the Court would have to face if it were to rely almost completely on his testimony.

A careful reading of the records of this case additionally would reveal significant flaws in the testimony of Jupiter.

Jupiter testified that he was able to recognize all the accused being barangaymates but failed to recognize the victim because he was quite distant from the place where the assault took place. He remembered well the number of times the accused Crisanto and Danilo had allegedly hacked the victim, yet, on further questioning by the trial court, he could not tell which part of the body of the victim was struck. On direct examination, Jupiter would insist that he approached the victim after the accused had fled. When asked by the court whether he went close to the "place of the incident," he answered in the negative, stating that he was shocked and frightened. Jupiter testified that the incident had lasted for four minutes and that he focused his flashlight on the commotion four times, at intervals of five seconds each, but, again, when queried by the court why he had waited for four minutes before focusing his flashlight, Jupiter kept silent and did not answer the question.

It would seem unlikely that after Jupiter focused his flashlight on them, accused-appellants would continue hacking the victim and for the two lookouts, who were supposed to precisely warn their co-accused of the presence of witnesses, to simply do nothing about it. The most common response of persons committing a crime would be to flee upon being discovered. Indeed, there should be greater reason for them to do so when that witness happened to be the son of their victim.

Testimonial evidence to be believed must not only proceed from the mouth of a credible witness but must be credible in itself which, by common experience and observation, could lead to the inference of at least its probability under the circumstances.[22] In a criminal prosecution the accused is confronted with the full might of state authority. The evidence of the prosecution must thus be strong to pierce the shield of presumptive innocence.[23]

Accused-appellants also take exception to the admissibility of the evidence consisting of the bloodstained bolo, polo shirt and short pants arguing that, even on the assumption that these articles did belong to accused-appellants, their seizure without a valid warrant has violated their constitutional rights.

Admittedly, the bloodstained bolo, polo shirt and short pants were taken, sans any search warrant, from accused-appellants Danilo Dacucos, Crisanto Baula and Ruben Baula, respectively, at a time when the police started to question them about the killing of Patrocinia Caburao.

Section 2, Article III, of the 1987 Constitution provides:

"Sec. 2. The right of the people to be secure in their persons, houses, papers, and effects against unreasonable searches and seizures of whatever nature and for any purpose shall be inviolable, and no search warrant or warrant of arrest shall issue except upon probable cause to be determined personally by the judge after examination under oath or affirmation of the complainant and the witnesses he may produce, and particularly describing the place to be searched and the persons or things to be seized."

The above constitutional mandate is complemented by Article III, Section 3(2), of the Constitution providing that -

"Section 3(2). Any evidence obtained in violation of this or the preceding section shall be inadmissible for any purpose in any proceeding" -

a rule pronounced by the Court in *Stonehill vs. Diokno*.^[24] The plain import of the fundamental law is thus to say that between the State and the people stands the protective authority of a magistrate clothed with power to issue or refuse to issue search warrants or warrants of arrest.^[25] The protection means that the State cannot simply intrude indiscriminately into houses, or conduct search and seizure thereat or on the person of an individual, and it puts up an almost impenetrable shield to protect privacy and accord sanctity against this unlawful form of restraint.^[26]

The above proscription against unreasonable searches and seizures is not absolute, of course, and the Court has had occasions to rule that a warrantless search and seizure of property is valid under certain circumstances. There can, for instance, be a lawful warrantless search incidental to a lawful arrest recognized under Section 12, Rules 126 of the Rules of Court and by prevailing jurisprudence; or seizure of evidence in "plain view," its elements being extant;^[27] or search of a moving vehicle;^[28] or consented search; or customs search.^[29] The situation here in question, however, can hardly come within the purview of any of the established exceptions.

In a warrantless search incidental to a lawful arrest, the arrest itself must have to be effected under the circumstances enumerated by law. One such case is when an offense has in fact just been committed, and the peace officer has personal knowledge of facts indicating that the person to be arrested has committed it.^[30]

Accused-appellants were not being arrested at the time that the subject articles were allegedly taken from them but were just being questioned by the police officers conducting the investigation about the death of Patrocinia Caburao. The investigating officers had no personal knowledge of facts indicating that the accused had committed the crime. Being in no position to effect a warrantless arrest, the police officers were thus likewise barred from effecting a warrantless search and seizure.

SPO4 Fermin Mirande testified:

"Fiscal:

"Q.

What have you found in the scene of the incident?

"Witness:

"A.

We were able to see the bloodied body of Patrocinia Caburao, sir.

"Court:

"Q.

Dead already?

"Witness:

"A.

Yes, sir, due to multiple hack wounds.

"Fiscal:

"Q.

What have you and your companions done there?

"Witness:

"A.

Since at the time we arrived at the place, we did not immediately gather such evidence to pin point any suspect. We tried our very best to conduct further investigation as to the place where this victim came from and we were able to establish that she came at the place where at the place of one store, sir.

"Court:

"Q.

Store of?

"Witness:

"A.

I could no longer.....

"Q.

In Siwasiw?

"A.

Yes, sir. From that place, according to the information given by the owner of the store, nobody had seen what is really happened to the victim, sir.

x x x x x x x x

"Fiscal:

"Q.

After you proceeded to the store and you have gathered that information, what transpired next in that store?

"Witness:

"A.

Since there is an information that there were persons who were drinking at the said store, sir.

"Court:

"Q.

Drinking wine you mean?

"Witness:

"A.

Yes, sir. We exerted our efforts to look for these people, sir.

"Fiscal:

"Q.

Have you ascertain the identities of the persons who were drinking at the store?

"Witness:

"A.

The four (4) suspects were the four (4) accused now, Crisanto Baula, Danilo Dacocos, Ruben Baula and Robert Baula and they were the one engaged in this drinking spree at the said place, sir.

"Court:

"Q.

All the accused?

"Witness:

"A.

And some other unidentified persons, sir.

"Fiscal:

"Q.

After you ascertain the four (4) accused and some other which were not identified were the one have drunk at the said store, what transpired next in your investigation?

"Witness:

"A.

We tried to look for these persons, identified persons, sir.

"Court:

"Q.

What happened?

"Witness:

"A.

And we were able to locate them at their respective houses, sir.

"Fiscal:

"Q.

Now, what transpired when you located the four (4) accused at their respective houses?

"Witness:

" A.

We examined their persons if they are really drunk at that time but the same no sign that they were drunk but we made on suspicion that one of the accused to where we requested to present his clothes during the night that he wore during their engagement at the drinking spree in the store, sir.

"Court:

"Q.

Who is this accused?

"Witness:

"A.

I have not bring with me the record, sir.

"Fiscal:

"Q.

Can you identify that suspect, if you can see him again?

"Witness:

"A.

One of the Baulas, sir.

"Q.

How many Baulas?

"A.

Three (3), sir.

"Q.

Can you identify by his face?

"Atty. Palma:

Already testified, he cannot.

"Court:

"Q.

You look at the accused?

"Witness:

"A.

So far, as of now, I could not exactly identify him, sir, but the moment I could see on my records, I have to consult my record.

"Q.

What record?

"A.

The one presented our transmittal to the NBI, sir.

"Q.

NBI, Dagupan City?

"A.

Yes, sir.

"Q.

Regarding what?

"A

.To determine as to whether the suspected bloodstains of the clothing that is of the victim, sir.

x x x x x x x x

"Fiscal:

"Q.

Now, you said the clothing which you have requested from one of the accused Baula to give to you which he wore that evening when there was drinking spree in the store, now, what part of the clothing was stained with blood?

"Witness:

"A.

I could no longer remember, sir.

"Q.

Now, what else have you done after you had requested this one of the accused Baula to present his clothes wore at the night of the drinking spree?

"A.

One of the persons who were engaged in the drinking spree was Danilo Dacocos, sir. We tried to look for him and we were able to see him at his hut almost one (1) kilometer away from the store, sir, and we were able to see one (1) bolo which was hang on the wall of the hut.

"Court:

"Q.

Was the bolo has bloodstained?

"Witness:

"A.

There is again a suspected bloodstain, sir, and that cause us to turn over for examination to the NBI, sir.

"Q.

And this is one of the specimen you sent?

"A.

Yes, sir.

x x x x x x x x

"Fiscal:

"Q.

Now, tell us if there was occupants of this hut of Danilo Dacocos when you saw this bloodstain on that bolo?

"Witness:

"A.

At the time we discovered the bolo there is no occupant but he was the one living at the said hut, sir.

"Q.

Why do you know that it was Danilo Dacocos was the one living in that hut?

"A.

During the interview he admitted that he is living there, sir.

"Q.

Now, what transpired next after going to this hut of Danilo Dacocos?

"A.

We took the bolo and sent to the NBI, sir." [31] (Emphasis supplied.)

Clearly, the police officers acted on a mere suspicion that accused-appellants could be responsible for the commission of the crime and only because of their being at the store where the victim was last seen.

Mere suspicion cannot satisfy the requirement of probable cause which signifies a reasonable ground of suspicion supported by circumstances sufficiently strong in themselves to warrant a cautious man to believe that the person accused is guilty of the offense with which he can be charged. [32] An illegal search cannot be undertaken and then an arrest effected on the strength of the evidence yielded by that search. [33]

The Court finds it less than credible the stance of the prosecution that the polo shirt and short pants have been voluntarily given. An alleged consent to a warrantless search and seizure cannot be based merely on the presumption of regularity in the performance of duty. [34] This presumption, by itself, cannot prevail against the constitutionally protected rights of an individual, and zeal in the pursuit of criminals cannot ennoble the use of arbitrary methods that the Constitution itself abhors. [35]

WHEREFORE, the assailed Decision is REVERSED and SET ASIDE and all the accused-appellants are hereby ACQUITTED of the crime charged and ordered to be immediately released from custody unless detained for some other lawful reason. Costs de oficio.

SO ORDERED.

Melo, (Chairman), Panganiban, and Gonzaga-Reyes, JJ., concur.

[1] Records, pp. 1-2.

[2] Exhs. B and B-1, Records, p. 7.

[3] Exh. K

[4] Exh. F

[5] Biology Report No. B-95-1750; Exh. L

[6] Exh. H-1, H-3

[7] Exh. H

[8] Exh. I-1, I-4

[9] Exh. I

[10] Exh. J-1 to J-5

[11] Exh. J

[12] Rollo, pp. 29-30.

[13] *People vs. Vinas, Sr.*, 245 SCRA 448

[14] *People vs. Escalante*, 238 SCRA 554 citing *People vs. Omega*, 76 SCRA 262; *People vs. Salas*, 66 SCRA

126.

[15] 182 SCRA 313.

[16] 161 SCRA 72.

[17] At pp. 78-79.

[18] *People vs. Manambit*, 271 SCRA 344.

[19] *People vs. Fuertes*, 229 SCRA 289.

[20] *People vs. Gornes*, 230 SCRA 270; *People vs. Errojo*, 229 SCRA 49.

[21] See *People vs. Escalante*, 238 SCRA 554.

[22] *People vs. Manambit*, 271 SCRA 344.

[23] *People vs. CFI of Rizal, Branch IV, Q.C.*, 161 SCRA 249.

[24] 20 SCRA 383.

[25] *People vs. Aruta*, 288 SCRA 626.

[26] *People vs. Aruta*, *ibid.*

[27] (a) a prior valid intrusion based on the valid warrantless arrest in which the police are legally present in the pursuit of their official duties;

(b) the evidence is inadvertently discovered by the police having the right to be where they are;

(c) the evidence is immediately apparent; and

(d) "plain view" justifies the seizure without further search.

[28] Highly regulated by the government, the vehicle's inherent mobility reduces expectation of privacy especially when its transit in public thoroughfares furnishes a highly reasonable suspicion amounting to probable cause that the occupant committed a criminal activity.

[29] *Padilla vs. Court of Appeals*, 269 SCRA 402.

[30] Section 5(b), Rule 113, Rules of Criminal Procedure.

[31] TSN, 06 November 1996, pp. 6-11.

[32] *People vs. Encinada*, 280 SCRA 72.

[33] *Ibid.*

[34] *Ibid.*

[35] *Tambasen vs. People*, 246 SCRA 184.

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.