

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. ANGELITO YATCO, ACCUSED-APPELLANT.

G.R. No. 138388. March 19, 2002

Ponente: KAPUNAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-138388/>

KAPUNAN, J.:

This is an automatic review of the Decision, dated November 23, 1998, of the Regional Trial Court, Branch 24, 4[th] Judicial Region, Biñan, Laguna, finding accused-appellant Angelito Yatco guilty beyond reasonable doubt of Robbery with Homicide and imposing upon him the supreme penalty of death.

The Information filed against accused-appellant charged him with robbery with homicide committed as follows:

That on or about January 6, 1994, in the Municipality of Sta. Rosa, Province of Laguna, Philippines and within the jurisdiction of this Honorable Court, accused Angelito Yatco, with intent to gain and without the knowledge and consent of the owner thereof, and by means of intimidation and violence upon person, did then and there willfully, unlawfully and feloniously take, steal and carry away cash in the amount of SEVEN THOUSAND THREE HUNDRED TWENTY PESOS AND THIRTY FIVE CENTAVOS (P7,320.35), Philippine Currency, belonging to San Miguel Corporation, to the damage and prejudice of the aforesaid owner in the aforementioned sum of P7,320.35, and in the process, with intent to kill, being then conveniently armed with a short firearm and without any justifiable cause, did then and there willfully, unlawfully and feloniously attack, assault and shot one Enrico Rivera y Yalong with the said firearm, thereby inflicting upon him gunshot wound on the vital parts of his body which directly caused his instantaneous death, to the damage and prejudice of his surviving heirs.

CONTRARY TO LAW.[1]

On arraignment, accused-appellant, assisted by his counsel, pleaded not guilty. Trial ensued.

As culled from the decision of the trial court, the uncontroverted facts are:

Enrico Rivera y Yalong (“Enrico” for short), was a driver/helper of the San Miguel Corporation in its Canlubang Sales Office in Laguna. He also doubled up as a salesman in the delivery truck, whenever the regular one was not around.

At about 3:20 o’clock in the afternoon of January 6, 1994, Enrico, while performing the dual role of driver and substitute salesman and in the company of truck helpers Mario Cena and Eduardo Bicatan in the delivery of beer at the Perez Merchandizing Store in Tagapo, Santa Rosa, Laguna, was shot with a gun and his sales collection of P7,320.35 was taken by his assailant (t.s.n. July 28, 1994, p. 41).

Enrico did not survive the attack. He was declared dead on arrival at the Biñan Doctor’s Hospital (Exh. A). Dr. Rolando Poblete, the Municipal Health Officer of Sta. Rosa, conducted the autopsy on Enrico’s body. In his Necropsy Report (Exhs. H and H-1) Dr. Poblete submitted the following findings:

“General Survey:

This is the body of Enrico Ruivera (sic) y Yalong, 30 years old, male, Filipino, 168 cm. in length,

approximately 180 lbs., in early rigor mortis.

Pertinent P.E. Findings:

Chest/Thorax-Gunshot Wound (point of entry), 0.8 cm at the level of left 4th intercostal space, anterior axillary line; Gunshot wound (point of exit) 1.0 cm., level of 7th rib, right posterior axillary line.

On opening up:

A Y-incision was done at the anterior chest wall exposing the heart and lungs. On inspection, the slug perforated the left lung at the level of 4th intercostal space, going slightly downward hitting the inferior aspect of the right ventricle, the slug made an exit wound on the 7th rib, right posterior axillary line. Clotted and unclotted blood found at the thoracic cavity was approximately 800 ml.

Other organs unremarkable.

CAUSE OF DEATH; CARDIO-RESPIRATORY ARREST 2 TO HYPOVELEMIC SHOCK DUE TO GUNSHOT WOUND TO THE VITAL ORGANS.[2]

To establish the identity of the assailant of Enrico, the prosecution presented as witnesses Normelito Robes and Mario Cena.

Robes, a warehouse helper and a resident of Tagapo, Sta. Rosa, Laguna, testified that on January 6, 1994 at around 3:20 in the afternoon he was taking his snack (merienda) in a store in Brgy. Tagapo, Sta. Rosa, Laguna. There was a delivery truck of the San Miguel Corporation parked right across the street, about four (4) meters away from where Robes was. He saw the driver of the truck grappling with another man positioned outside the truck. According to Robes, the man outside the truck who grappled with the driver was accused-appellant.[3]

Robes further narrated that accused-appellant was trying to wrest away something from the driver. When it appeared that accused-appellant could not get hold of the object because the driver pulled himself away from the window, accused-appellant shot him. Thereafter, accused-appellant took away the money that was in the hand of the driver, alighted from the truck and ran towards the direction of Biñan. Robes later learned that the victim's name was Enrico Rivera.[4]

Mario Cena, a helper in the same delivery truck, narrated that he and another helper, Eduardo Bicanan, were unloading cases of beer from the middle part of the vehicle at the time when they heard what then sounded like a firecracker. Cena stated that he ignored the explosion at first until he saw a man with a gun. The man ran away while he was putting the money in his pocket. Cena immediately went to the driver's seat and saw the lifeless body of Enrico. Cena ran after the assailant but he could not catch up with him. Cena positively identified accused-appellant as the gunman.[5]

The prosecution likewise presented other witnesses, namely, Myrna Rivera, Dr. Rolando Poblete and Eduardo Bicanan. Myrna, wife of the victim, testified on the expenses the family incurred as a result of her husband's untimely death.[6] Dr. Rolando Poblete, Municipal Health Officer of Sta. Rosa, affirmed the findings contained in the Necropsy Report[7] which he prepared in connection with Enrico's death.[8] Eduardo Bicanan, the other helper in the same truck, substantially corroborated Cena's testimony. When he (Bicanan) went to the driver's seat, Enrico told him "May tama ako." Unlike Cena, however, Bicanan did not see the assailant because he immediately ran away.[9]

For his part, to exculpate himself, accused-appellant interposed alibi and denial. He averred that he was a traffic aide at Sta. Rosa, Laguna and assigned in Balibago. He has two children, Tani Kate and Michael. In the afternoon of January 6, 1994 he was at their rented house in Tagapo, Sta. Rosa, Laguna. At about 3:00 to 4:00 in the

afternoon, he left the house to fetch his daughter Tani Kate at the Sta. Rosa Elementary School, Tagapo, Sta. Rosa, Laguna. Upon their return to the house at 5:00 in the afternoon, accused-appellant prepared their supper.[10]

Accused-appellant stated that he was invited for questioning at the police station on January 27, 1994. He claimed that there he was tortured by Major Rogelio de Castro of the Sta. Rosa Police Department and by CIS agents Malabanan, Macatangay and Legaspi. They then locked him up inside the prison cell. He begged them to allow his brothers and sisters to see him but his request fell on deaf ears. On January 31, 1994 he was transferred to Sta. Rosa, Laguna. He asked the Chief of Police to let him see a doctor. His request having been granted, accused-appellant was examined by Dr. Poblete on February 1, 1994.[11]

Dr. Poblete confirmed on the witness stand that, upon the written request of the Chief Investigator,[12] he examined accused-appellant on February 2, 1994 in his clinic in Sta. Rosa, Laguna. Accused-appellant then had multiple contusions on the different parts of his body like the chest, thorax, at the back of his left ear, lumbar area, and the head.[13] A blunt object could have caused these contusions. When the patient was presented to him, the contusions were already healing. The wounds could have been inflicted not more than a week before the examination.[14]

On rebuttal, the prosecution presented SPO2 Victor Torres of the 4th Regional Office, Camp Vicente Lim, Canlubang, Laguna. He testified that on January 26, 1994 he investigated accused-appellant at Camp Vicente Lim. He denied, however, that he and his fellow police officers tortured accused-appellant. He likewise denied that there was a Major Ramos in their group. He averred that it was Dr. Digna O. Ambas who examined accused-appellant on January 27, 1994 after the investigation. Thereafter the examination, they put accused-appellant behind bars.[15]

SPO4 Rodolfo Macatangay stated that he was one of the police officers who investigated accused-appellant. The other police officers present during the investigation were Sgts. Legaspi, Malabanan, and Major Lachica. He denied that they tortured accused-appellant. Further, he said that their Intelligence Officer's name is Major Lachica and that there is no Major Ramos in their unit.[16]

Delfin Santos, Composite Illustrator or Cartographer of the Criminal Investigation Group of Camp Crame, Quezon City, said that, upon the request of the police authorities, he prepared the cartographic sketch of accused-appellant based on the information given by Normelito Robes, the alleged eyewitness.[17]

Dra. Digna Ambas testified that she physically examined accused-appellant on January 27, 1994. She said that his vital signs and all the body systems were essentially normal. There were no physical injuries noted.[18]

On sur-rebuttal, the defense recalled accused-appellant on the witness stand. He testified that as a traffic aide he was under the supervision of SPO3 Lolit Cuyos. When he was arrested on January 26, 1994 he was then doing his job directing traffic. Sgt. Macatangay, Sgt. Legaspi, SPO2 Torres and Major Lachica apprehended him. They brought him to PNP Canlubang. There, he saw Myrna Rivera, the wife of the victim. Further, he also saw Delfin Santos, the cartographer. A woman photographer took accused-appellant's picture and his fingerprints were also taken. Dra. Digna Ambas examined him. After that he was brought to the office of the CIS where he was tortured.[19]

After the prosecution and defense presented their respective evidence, the trial court rendered judgment finding accused-appellant guilty of robbery with homicide and sentencing him to death. The dispositive portion of the trial court's decision reads:

WHEREFORE, this Court finds accused Angelito Yatco guilty beyond reasonable doubt of the crime of

Robbery with homicide as charged in the Information and hereby imposes upon him the DEATH PENALTY, and orders him to indemnify the heirs of Enrico Rivera y Yalong, as follows:

- a) the sum of P44,263.00 as funeral expenses;
- b) the sum of P50,000.00 as moral damages; and
- c) the sum of P7,680,000.00 as lost earning capacity of the said victim.

The accused is likewise ordered to indemnify the San Miguel Corporation of the sum of P7,320.35 representing the sales collection taken from said victim.

No pronouncement as to cost.

SO ORDERED.[20]

In view of the imposition of the death penalty, this case was automatically elevated to this Court for review. In his appeal brief, accused-appellant alleges that:

THE TRIAL COURT ERRED IN FINDING THE ACCUSED'S GUILT WAS PROVEN BEYOND REASONABLE DOUBT NOTWITHSTANDING THAT (a) THE PROSECUTION WITNESSES WERE BIASED AND PARTIAL AND THEIR TESTIMONIES WERE UNRELIABLE AND (b) THE TRIAL JUDGE WHO RENDERED THE DECISION WAS NOT ABLE TO FULLY APPRECIATE THE DEPORTMENT AND BIAS OF THE PROSECUTION WITNESSES BEING A MERE REPLACEMENT OF TWO (2) OTHER TRIAL JUDGES WHO INITIALLY HEARD THE CASE.[21]

Accused-appellant primarily impugns the positive identification of him as the perpetrator of the crime by prosecution witnesses Robes and Cena. Accused-appellant specifically points to alleged inconsistent statements made by Robes in his affidavit and in his testimony in court. Robes allegedly claimed in the sworn statement that he was twelve (12) meters away from the truck at the time of the incident but in his testimony, he said that the distance was only four (4) meters. In his first sworn statement of January 26, 1994, Robes made no mention of accused-appellant's facial features and physical attributes but on the same day, the CIS cartographer was able to prepare a sketch of the assailant based allegedly on the description given by Robes. Accused-appellant likewise makes an issue of the fact that Robes did not report to the police immediately but waited until January 26, 1994, or twenty (20) days later, to tell the authorities about what he witnessed.

Contrary to accused-appellant's contention Robes described him as:

11. T:

Mailalarawan mo ba ang buo niyang hitsura o kaanyuan (ang salarin)?

S:

Opo, siya po ay may taas na 5'3 hanggang 5'4, may edad na 40-45, maliit ang pangangatawan, may timbang na 110-115 lbs, kayumanggi ang kanyang kulay, manipis ang mukha, may bigote, manipis and labi, medyo bilugan ang mga mata, may katangusan ang ilong, at bagsak ang buhok na medyo maigsi.[22]

It was on the basis of this description and such other details that Robes gave the CIS cartographer, although not reflected in the sworn statement that accused-appellant's facial features were reproduced.

With respect to his positive identification by Cena, accused-appellant alleges that when Cena executed his affidavit on January 7, 1994, a day after the crime, he was unable to describe the features of the assailant. However, in his second sworn statement executed on January 27, 1994, Cena averred that he could identify the assailant if he saw him again. We are not persuaded. In his earlier sworn statement, unlike the second one, Cena was not specifically asked to describe accused-appellant's features, so no such description was offered.

Accused-appellant further attempts to discredit the police line-up conducted on January 27, 1994, where Robes and Cena separately pointed to him as Enrico's assailant, by implying that these witnesses were coached.

Essentially, the assertions of accused-appellant delve into the credibility of the eyewitnesses. The well-settled rule in this jurisdiction is that the trial court's findings on the credibility of witnesses are entitled to the highest degree of respect and will not be disturbed on appeal absent any clear showing that it overlooked, misunderstood or misapplied some facts or circumstances of weight or substance which could have affected the result of the case.[23]

In this case, there is no reason to deviate from the findings of the trial court as to the identity of accused-appellant as the person who shot Enrico considering that the prosecution eyewitnesses testified on this fact in a categorical, straightforward and consistent manner. Robes testified thus:

Q:

Will you [be] able to recognize that person outside who was grabbing the person inside the truck?

A:

Yes, sir.

Q:

If that person is inside the Courtroom will you kindly point to him?

A:

Yes, sir.

Q:

Will you kindly point to him?

Interpreter:

The witness pointing to a man who answered by the name [of] Angelito Yatco.

Q:

Now, what happened when you saw Angelito the accused in this case grabbing with the person inside the truck. What happened when they grabbing (sic) with each other?

A:

After the person do (sic) not get what he want the driver of the truck move (sic) towards the center of the truck and then the person grabbing with the driver hold (sic) the window of the driver side and then I saw him shot the driver, sir.[24]

Cena, on the other hand, identified accused-appellant in this wise:

Q:

Now, at the time you said you went to the driver seat after you heard a gun shot, did you find out in what part of the body Enrico Rivera was shot?

A:

He was shot on the left side of the neck and exit on the right side of the body, sir.

Q:

Now, you said that you saw the accused carrying a gun, do you know what kind of gun was that?

Atty. Reyes:

We would like to object to the question, to the word of the Fiscal accused. It is misleading considering that his previous answer, that he saw a man.

Fiscal Nieva:

I withdraw the question.

Q:

Now, when you saw that man, were (continuing) you able to recognize that man?

A:

Yes, sir.

Q:

If he is inside the Court room, will you kindly point to him?

A:

Yes, sir. (the witness is pointing [to] a man who answered by the name Angelito Yatco)

Q:

Now, the accused Angelito Yatco when you saw him running with a gun, how were you able to recognize him?

A:

On his actuation and I saw his side view, sir.

Court:

Q:

How far were you?

A:

About 20 meters, Your Honor.

Q:

When you saw him running?

A:

When he stopped running, Your Honor.[25]

There is nothing in the record to show that Robes and Cena were moved by evil intent to impute the crime on accused-appellant, thus the presumption is that they were not so actuated and their testimonies are entitled to full faith and credit.[26] Further, this Court has ruled that where conditions of visibility are favorable and the witness does not appear to be biased, his assertion as to the identity of the malefactor should be accepted as trustworthy.[27]

As to the alleged inconsistent statements and omissions in the respective affidavits and testimonies of Robes and Cena, suffice it to say that the discrepancies between the affidavit of a witness and his testimony in court do not necessarily discredit the witness because it is a matter of judicial experience that affidavits, being taken ex-parte, are almost always incomplete and often inaccurate.[28] To the Court's mind, the lapses in the statements of the eyewitnesses refer to inconsequential details and not to the crux of the case – that it was accused-appellant who

gunned down Enrico. Their testimonies cannot be discredited by a mere alibi and denial.

The defense of alibi is inherently weak and cannot prevail over the positive identification of the accused-appellant as the offender. Moreover, for the defense of alibi to prosper, it is not sufficient that accused-appellant prove that he was somewhere else when the crime was committed; he must also show that that it was physically impossible for him to be at the locus criminis or its immediate vicinity.[29]

Accused-appellant failed to show that it was physically impossible for him to be at the scene of the crime when it was committed. He claimed that he was in his house in Tagapo, Sta. Rosa, Laguna, the same town where the crime took place. Undoubtedly, the distance between accused-appellant's house and the scene of the crime was not such that as to render it impossible for him to be at the latter when the crime was committed.

Accused-appellant opines that the findings of the trial court cannot be heavily relied upon because the judge who rendered the decision was not the one who tried and heard the testimonies of the witnesses. While it is true that Judge Pablo Francisco, the judge who penned the decision, merely took over the case from Judge Ed Vincent Albano and later Judge Rodrigo Cosico, it does not necessarily follow that Judge Francisco cannot render a valid and just decision. The complete records of the case, including the transcript of stenographic notes, were before Judge Francisco and it can be fairly assumed that, in rendering the decision, the records were thoroughly scrutinized and evaluated by him.[30] Indeed, the efficacy of a decision is not necessarily impaired by the fact that its writer only took over from a colleague who had earlier presided at the trial.[31]

Article 294(1) of the Revised Penal Code provides:

Art. 294(1). Robbery with violence against or intimidation of persons - Penalties. - Any person guilty of robbery with the use of violence against or intimidation of any person shall suffer:

- The penalty of reclusion perpetua to death, when by reason or on occasion of the robbery, the crime of homicide shall have been committed . . .

The elements of robbery with homicide are (1) the taking of personal property is perpetrated by means of violence or intimidation against a person; (2) the property taken belongs to another; (3) the taking is characterized by intent to gain or *animo lucrandi*; and (4) on the occasion of the robbery or by reason thereof, the crime of homicide, in its generic sense, is committed.[32]

Doubtless, that accused-appellant was responsible for the killing of Enrico had been sufficiently established by the prosecution. Further, that the killing was committed on the occasion of a "hold-up" was duly admitted by the parties during trial.[33] All the elements had been sufficiently proven by the prosecution in this case, thus, the crime committed by accused-appellant is indubitably robbery with homicide.

Under Article 294(1) of the Revised Penal Code, the penalty for robbery with homicide is composed of two indivisible penalties, namely, reclusion perpetua to death. The trial court erred when it sentenced accused-appellant to suffer the penalty of death. Article 63 of the Revised Penal Code provides:

Art. 63. Rules for the application of indivisible penalties.-

xxx

In all cases in which the law prescribes a penalty composed of two indivisible penalties, the following rules shall be observed in the application thereof:

- When in the commission of the deed there is present only one aggravating circumstance, the greater penalty shall be applied.

- When there are neither mitigating nor aggravating circumstances in the commission of the deed, the lesser penalty shall be applied.
- When the commission of the act is attended by some mitigating circumstance and there is no aggravating circumstance, the lesser penalty shall be applied.
- When both mitigating and aggravating circumstances attended the commission of the act, the courts shall reasonably allow them to offset one another in consideration of their number and importance, for the purpose of applying the penalty in accordance with the preceding rules, according to the result of such compensation.

Paragraph (2) of the above provision applies in this case since neither aggravating nor mitigating was proved during the trial. Accordingly, the lesser penalty, which in this case is reclusion perpetua, should be imposed upon accused-appellant.

Regarding damages, the trial court failed to award civil indemnity to the heirs of the victim. Civil indemnity is granted without proof. Current jurisprudence mandates the award of P50,000.00 as indemnity ex delicto.[34] It is automatically granted to the heirs of the victim without need of any evidence other than the fact of the commission of the crime.[35]

As to actual damages, the Court can only grant such amount for expenses if proper receipts support them.[36] The award of P44,263.00 for funeral expenses should be reduced to P39,775.00 since only the latter amount was evidenced by receipts.

Finally, there is further need to modify the trial court's award for the loss of earning capacity to the heirs of the deceased victim. The formula for computing the same as established in decided cases[37] is as follows:

Gross Necessary

Net Earning = Life x Annual -Living

Capacity Expectancy Income Expenses

The life expectancy is equivalent to two thirds (2/3) multiplied by the difference of 80 and the age of the deceased.[38] Since Enrico was 31 years old at the time of his death, his life expectancy was 32.67 more years.[39] His Annual Income Tax Return showed that his gross annual income was P286,654.93. Allowing for necessary living expenses of fifty percent (50%) of his gross earnings, his total net earning capacity amounts to P4,681,935.10.[40]

WHEREFORE, the Decision, dated November 23, 1998, of the Regional Trial Court, Branch 24, 4th Judicial Region, Biñan, Laguna, in Criminal Case No. 8766—B, finding accused-appellant Angelito Yatco guilty beyond reasonable doubt of robbery with homicide is AFFIRMED with MODIFICATION that the penalty is reduced to reclusion perpetua with all its accessory penalties. Accused-appellant is ordered to reimburse San Miguel Corporation the amount of P7,320.35, and to pay the heirs of Enrico Rivera in the amounts of P50,000.00 as civil indemnity, P50,000.00 as moral damages, P39,775.00 as actual damages and P4,681,935.10 as loss of earning capacity. No pronouncement as to costs.

SO ORDERED.

Davide, Jr., C.J., Bellosillo, Melo, Vitug, Mendoza, Quisumbing, Panganiban, Buena, Ynares-Santiago, De Leon, Jr., Gutierrez, and Carpio, JJ., concur.

Puno, J., on official leave.

-
- [1] Original Record, p. 1.
- [2] Decision, pp. 1-2; Rollo, pp. 24-34.
- [3] TSN, June 30, 1994, pp. 3-6.
- [4] Id., at 6-7.
- [5] TSN, June 30, 1994, pp. 22-35.
- [6] TSN, July 7, 1994, pp. 3-12
- [7] Exhibits “H” and “H-1”.
- [8] TSN, July 14, 1994, pp. 7-11.
- [9] TSN, July 28, 1994, pp. 3-11.
- [10] TSN, August 4, 1994, pp. 3-7.
- [11] Id., at 8-20.
- [12] Exhibit “1-A.”
- [13] Exhibit “2.”
- [14] TSN, November 10, 1994, pp. 3-9.
- [15] TSN, September 1, 1995, pp. 5-26.
- [16] TSN, December 7, 1995, pp. 3-7.
- [17] TSN, September 5, 1996, pp. 7-14.
- [18] TSN, April 15, 1997, pp. 3-8.
- [19] TSN, July 28, 1998, pp. 5-10.
- [20] Original Record, pp. 318-319.
- [21] Brief for the Accused-appellant, Rollo, p. 58.
- [22] Original Record, p. 24.
- [23] *People vs. Pedroso*, 336 SCRA 163 (2000); *People vs. Pulusan*, 290 SCRA 353 (1998).
- [24] TSN, June 30, 1994, pp. 5-6.
- [25] TSN, June 30, 1994, pp. 27-28.
- [26] *People vs. Reyes*, 309 SCRA 622 (1999).
- [27] *People vs. Capillio*, 319 SCRA 223 (1999).
- [28] *People vs. Templo*, 346 SCRA 626 (2000).
- [29] *People vs. Predroso*, supra.
- [30] *Concepcion vs. Court of Appeals*, 324 SCRA 85 (2000).

[31] People vs. Aspiras, 330 SCRA 479 (2000).

[32] People vs. Cando, 344 SCRA 330 (2000); People vs. Paraiso, 319 SCRA 422 (1999).

[33] TSN, July 28, 1994, p. 4.

[34] People vs. Garces, Jr., 322 SCRA 834, 852 (2000).

[35] People vs. Dando, 325 SCRA 406, 428 (2000).

[36] People vs. Maxion, G.R. No. 135145, July 19, 2001.

[37] Negros Navigation Co., Inc. vs. Court of Appeals, 281 SCRA 534 (1997); Metro Manila Transit Corporation vs. Court of Appeals, 298 SCRA 495 (1998); Fortune Express, Inc. vs. Court of Appeals, et al., 305 SCRA 14 (1999).

[38] Villa Rey Transit, Inc. vs. CA, 31 SCRA 511 (1970).

[39] $2/3(80-31) = 32.66$.

[40]

P286,654.93

P143,327.47

x .50

x 32.66

P143,327.47 net annual income

P4,681,935.10 net earning capacity

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.