PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. JUAN CABBAB, JR., ACCUSED-APPELLANT.

G.R. NO. 173479. July 12, 2007

Ponente: GARCIA, J.

Read online (full-text search, related cases, audio case brief): https://batas.org/library/g-r-no-173479/

GARCIA, J.:

Before the Court on automatic review is the decision[1] dated February 22, 2006 of the Court of Appeals (CA) in CA-G.R. CR-H.C. No. 00968 which affirmed, with modification, an earlier decision of the Regional Trial Court (RTC) of Bangued, Abra, Branch 2, in Criminal Case No. 687, finding appellant Juan Cabbab, Jr., guilty beyond reasonable doubt of the crime of Robbery with Homicide and Attempted Murder and sentencing him to suffer the penalty of reclusion perpetua.

Pursuant to our pronouncement in People v. Mateo[2] which modified the provisions of the Rules of Court insofar as they provide for direct appeals from the RTC to this Court in cases where the penalty imposed by the trial court is death, reclusion perpetua or life imprisonment, this case was earlier[3] referred to the CA, whereat it was docketed as CA-G.R. CR-H.C. No. 01978, for appropriate action and disposition.

The Case

In the court of origin, appellant Juan Cabbab, Jr., along with his cousin-in-law Segundino Calpito, was charged with the crimes of Double Murder and Attempted Murder with Robbery in an Information[4] alleging, as follows:

> That on or about April 22, 1988, in Sitio Kayawkaw, Barangay Kimmalasag, Municipality of San Isidro, Province of Abra, Philippines and within the jurisdiction of this Honorable Court, the above-named accused with the intent to kill, treachery and evident premeditation, while armed with a firearm (not-recover), conspiring, confederating and mutually helping one another, did then and there, willfully, unlawfully and feloniously assault, attack and shot from ambush WINNER AGBULOS and EDDIE QUINDASAN, consequently inflicting thereby multiple gunshot wounds on the different parts of their bodies, killing Winner Agbulos on the spot and causing the death of Eddie Quindasan shortly thereafter, then and there willfully, unlawfully and feloniously, with intent to kill, shot William Belmes, said accused having commenced the execution of Murder by overt acts but were unable to perform all the acts of execution, which would have produced the crime of Murder as a consequence thereof, due to alertness of victim William Belmes to roll and poor marksmanship of the accused thus prevented his death, then and there willfully and unlawfully and feloniously, with the intent of gain, take, steal and carry away the money of Winner Agbulos in the amount of Twelve Thousand Pesos (P12,000.00), Philippine currency..
>
> ALL CONTRARY TO LAW with the aggravating circumstance of: (1) uninhabited place.

On arraignment, appellant Juan Cabbab, Jr. and accused Segundino Calpito separately entered their pleas of "Not Guilty" to the crimes charged. Thereafter, trial on the merits ensued, in the course of which the prosecution presented the oral testimonies of M/Sgt. Godofredo Tubadeza, a police investigator at Camp Villamor, Bangued, Abra; PO William Belmes, a member of the Integrated National Police at the Villaviciosa Police Station; Vidal

Agbulos, father of the victim Winner Agbulos; Dra. Leona Garcia-Beroña, medico-legal officer who conducted an autopsy on the body of Winner Agbulos; and Dr. Godofreco Gasa, a physician at the Abra Provincial Hospital.

For its part, the defense presented the appellant himself; accused Segundino Calpito; and George de Lara, a Forensic Chemist of the National Bureau of Investigation (NBI).

The Evidence

The People's version of the incident is succinctly summarized by the Office of the Solicitor General (OSG) in its Appellee's Brief,[5] to wit:

> In the morning of 22 April 1988, father and son Vidal Agbulos and Winner Agbulos, together with Eddie Quindasan, Felipe Abad and Police Officer (PO) William Belmes, went to Barangay Kimmalasag, San Isidro, Abra to attend a "fiesta" celebration. Upon arrival in the area, they found out that the fiesta celebration was already over, thus, they decided to go home in Villaviciosa, Abra. Since it was already lunchtime, the group took their lunch at Sitio Turod, located in the same area of Barangay Kimmalasag. After taking their lunch and on their way home, they were met by accused-appellant Juan Cabbab, Jr. and Segundino Calpito who invited them to play "pepito," a local version of the game of "russian poker."
>
> Only Winner Agbulos and Eddie Quindasan played "pepito" with the group of accused-appellant. Winner Agbulos played the dealer/banker in the game while accused-appellant and Segundino Calpito acted as players therein. Around 3:00 o'clock p.m., PO William Belmes told Winner Agbulos and Eddie Quindasan that they should be going home after three (3) more deals. About 3:30 p.m., Winner Agbulos's group wrapped-up the game and were set for home together with his group. Winner Agbulos won the game.
>
> While walking on their way home from Sitio Turod, PO William Belmes, who was behind Winner Agbulos and Eddie Quindasan picking-up guava fruits from a tree, saw accused-appellant, accused Segundino Calpito and a companion running up a hill. Suddenly, he heard gunshots and saw Winner Agbulos and Eddie Quindasan, who were then walking ahead of the group, hit by the gunfire.
>
> By instant, PO William Belmes dove into a canal to save himself from the continuous gunfire of accused-appellant. PO William Belmes ran towards Vidal Agbulos and Felipe Abad, who were walking behind the group, and informed the two that Winner Agbulos and Eddie Quindasan were ambushed by accused-appellant and Segundino Calpito. The three (3) proceeded to the crime scene where they saw the dead body of Winner Agbulos together with Eddie Quindasan whom they mistook for dead. The three sought help from the police authorities of Pilar, Abra and returned to the scene of the crime where they found Eddie Quindasan who was still alive and who narrated that it was Juan Cabbab, Jr. and Segundino Calpito who ambused them and took the money, estimated at P12,000.00, of Winner Agbulos which he won in the card game. Eddie Quindasan was brought to the Abra Provincial Hospital but died the following day.
>
> Postmortem examination of Winner Agbulos showed that the cause of his death was "cardio respiratory arrest secondary to hemorrhage due to multiple gunshot wounds." On the other hand, Eddie Quindasan's cause of death was "cardio respiratory arrest secondary to hypovolemic shock due to multiple gunshot wounds."

For the defense, appellant himself took the witness stand claiming that in the morning of April 22, 1988, he went to Palao, Baddek, Bangued, Abra to visit his friends Romeo, Demetrio and Restituto, all surnamed Borreta. He stayed there almost the entire day and left only at around 5:00 p.m. He arrived home in Kimmalasag, San Isidro, Abra at around 5:30 p.m. He declared that his co-accused Calpito was not with him that day. He likewise averred that he did not know prosecution witnesses PO William Belmes and Vidal Agbulos nor did he know of any motive for them to testify against him.

Appellant's co-accused Calpito denied having committed the crimes charged. He testified that at around 8:30 a.m. of April 22, 1988, he went fishing at Kimmalasag, San Isidro, Abra until 4:00 a.m. of the following day.

Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

George de Lara, Forensic Chemist of the NBI, testified that he conducted an examination on the paraffin cast taken from appellant to determine the presence of gunpowder residue or nitrates on appellant's hands. The results of the said examination showed that appellant was negative of nitrates. He opined that certain factors may affect the result of the test such as perspiration, wind velocity, humidity or the type of gun used. He also theorized that a paraffin test would yield a negative result if fertilizers or cosmetics are applied to the hands before the cast is taken.

The Trial Court's Decision

In a decision[6] dated August 26, 1997, the trial court acquitted Segundino Calpito but found appellant Juan Cabbab, Jr. guilty of two crimes, i.e. (1) robbery with double homicide and (2) attempted murder. Dispositively, the decision reads:

> WHEREFORE, the court finds accused Juan Cabbab, Jr. guilty beyond reasonable doubt of double murder with robbery or better put, robbery with double homicide and attempted murder as defined in Art. 248 of the Revised Penal Code in relation to Art. 294 of the same Code or robbery with double homicide defined and penalized under Art. 248 in relation to Art. 6 of the Same Code with aggravating circumstance of uninhabited place with no mitigating circumstances and sentences him with the penalty of reclusion perpetua for each of the killing of Winner Agbulos and for robbing the said victim after killing him and for the killing of Eddie Quindasan. The court likewise finds the accused Juan Cabbab, Jr. guilty beyond reasonable doubt of the attempted murder defined and penalized in Art. 48 in relation to Art. 6 of the Revised Penal Code. These offenses attended by the aggravating circumstance of uninhabited place with no mitigating circumstances and sentence him to suffer an indeterminate penalty of FOUR (4) MONTHS and ONE (1) DAY of arresto mayor as minimum to FOUR (4) YEARS and TWO (2) MONTHS of prision correccional as maximum.
>
> He is hereby ordered to pay the heirs of the victims P50,000.00 for each of them plus P20,000.00 also for each of them as actual expenses and finally, the amount of P100,000.00 also for each of them as moral and exemplary damages and to pay the costs of this suit.
>
> Accused Segundino Calpito is acquitted for insufficiency of evidence.
>
> SO ORDERED.

The records of the case were then transmitted to this Court on automatic review. As stated at the onset hereof, the Court, in its Resolution[7] of January 17, 2006 and pursuant to its ruling in People v. Mateo,[8] referred the case and its records to the CA for appropriate action and disposition, whereat it was docketed as CA-G.R. CR-H.C. No. 00968.

In a decision dated February 22, 2006, the CA modified the trial court's decision and found appellant guilty of the special complex crime of Robbery with Homicide and imposed upon him the penalty of reclusion perpetua. The CA also affirmed appellant's conviction, as well as the penalty imposed, for the separate crime of attempted murder.

From the CA, the case was then elevated to this Court for automatic review. In its Resolution[9] of September 20, 2006, the Court resolved to require the parties to submit their respective supplemental briefs.

In a Manifestation dated November 16, 2006, the OSG, in behalf of appellee People, informed the Court that it is no longer filing a supplemental brief and was merely adopting its appellee's brief before the CA as its supplemental brief.

Appellant, on the other hand, filed on December 18, 2006 his supplemental brief on the lone assigned error, that:

> THE HONORABLE COURT OF APPEALS GRAVELY ERRED IN REJECTING THE DEFENSE OF

ALIBI INTERPOSED BY THE ACCUSED-APPELLANT, DESPITE THE FACT THAT THE VERSION IS MORE CREDIBLE AND SUPPORTED BY EVIDENCE.

Insisting that the prosecution failed to prove his guilt beyond reasonable doubt, appellant pleads for acquittal. He avers that the witnesses for the prosecution failed to positively identify him as the perpetrator of the crime as they did not actually see him shoot the victims. Appellant also relies on the results of the paraffin test showing that he was negative of gunpowder nitrates.

The appeal must fail.

Appellant's contention that the witnesses for the prosecution failed to identify him as the perpetrator of the crime is belied by the testimony of PO William Belmes, who was with the victims when the incident happened. We quote from the transcripts of the stenographic notes:

William Belmes on Re-direct Examination

FISCAL FLORES

Q.

Mr. Witness, when you gave your statement on April 30, 1988, exactly eight (8) days after the incident when the incident wherein you were investigated upon still very very fresh in your mind (sic). Now, in your statement which you gave to the investigator, Pat. Tubadeza, you stated that you saw the persons shot at Winner Agbulos and Eddie Quindasan and after the two (2) had fell down then you also likewise saw them shot at you at the time you were rolling to the ground. Do you affirm and confirm this statement of yours which you subscribed before Fiscal Ricarte Valera?

ATTY. YANURIA:

Your Honor, it is misleading, we object, in so far as the shooting of Eddie Quindasan and Winner Agbulos was not seen. He only saw the persons who were firing at him namely: Juan Cabbab and Segundino Calpito.

COURT:

In his testimony before the court he testified before the court that he saw Juan Cabbab and Segundino Calpito shot at Eddie Quindasan and Winner Agbulos. Reform the question.

FISCAL FLORES

:

Q.

However, you saw these two (2) accused, Juan Cabbab and Segundino Calpito shoot at you?

Turn this case into an audio lecture - facts, issues, ruling and doctrine - at batas.org

A.

Yes, sir.

Q.

Will you tell the court if how far were these two (2) accused when they were firing at you?

A.

Eight (8) meters, sir.

Q.

And therefore what time is it when they were firing at you?

A.

If I'm not mistaken it was 4:00 o'clock in the afternoon. [10]

xxx xxx xxx

William Belmes on cross-examination

. ATTY. YANURIA:

Q.

In other words, it was you being shot out by Segundino Calpito and Juan Cabbab but you did not see them shoot at Winner Agbulos and Eddie Quindasan?

A.

I saw Juan Cabbab and Segundino fire at Winner Agbulos and Eddie Quindasan (the witness using the word "banat") and when they already fell down, they continued firing attempt and in my case I rolled and they also fired at me.[11]

The above testimony adequately showed that Belmes was able to look at and see appellant at the time he perpetrated the crime. To our mind, Belmes could not have made a mistake with respect to appellant's identity, what with the fact that just a few hours before the incident, it was even appellant himself who invited Belmes and his group to play poker. For sure, Belmes had a face-to-face encounter with appellant before the assault and thus would be able to unmistakably recognize him especially because at the time of the attack, Belmes was just eight (8) meters away from appellant and conditions of visibility were very good at the time of the incident as it was only around 4:00 in the afternoon. Jurisprudence recognizes that it is the most natural reaction of victims of violence to strive to see the appearance of the perpetrators of the crime and to observe the manner in which the crime was committed.[12]

Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

Belmes' testimony was corroborated by that of Vidal Agbulos who was also with the group when the robbery and shooting took place. Again, we quote from the transcripts of stenographic notes:

> Vidal Agbulos on direct examination
>
> FISCAL FLORES:
>
> Q.
>
> What did you do next when Felipe Abad informed you again that your son was already killed and Eddie Quindasan was injured?
>
> A.
>
> Even if he told me about that I just went ahead.
>
> Q.
>
> What happened next when he told you that?
>
> A.
>
> When I went ahead I saw Juan Cabbab took the wallet from my son.
>
> COURT:
>
> A. Yes, sir, my son was lying on the ground facing down.[13]

Clearly, then, Vidal Agbulos positively identified appellant as the person who robbed his son, Winner, of his winnings. Just like Belmes, Agbulos could also not have been mistaken as to appellant's identity considering that it was appellant who personally approached Agbulos' group and invited them to play poker just a few hours prior to the commission of the crime. Further, Agbulos testified that he was familiar with appellant as he would often see him in a cockpit in San Isidro, Abra.

To be sure, the trial court which had the unique opportunity to observe at first hand the demeanor of witnesses Belmes and Agbulos and asses whether they are telling the truth or not, gave full faith and credence to their testimonies. Finding no facts and circumstances of weight and substance that would otherwise warrant a different conclusion, the Court accords the highest respect to the trial court's evaluation of the credibility of these witnesses.

Appellant likewise capitalizes on the results of the paraffin test showing that both his hands yielded no trace of gunpowder residue. Unfortunately for appellant, the results of the paraffin test would not exculpate him. The negative findings of said test do not conclusively show that a person did not discharge a firearm at the time the

crime was committed. This Court has observed that it is quite possible for a person to discharge a firearm and yet exhibit no trace of nitrates: when, e.g., the assailant fired the weapon while wearing gloves or where the assailant thoroughly washes his hands thereafter.[14] As George de Lara of the NBI stated in his testimony before the trial court, if a person applies cosmetics on his hands before the cast is taken, gunpowder residue would not be found in that person's hands. He also testified that certain factors could contribute to the negative result of a paraffin test such as perspiration, humidity or the type of firearm used. In fine, a finding that the paraffin test on the person of the appellant yielded negative results is not conclusive evidence to show that he indeed had not fired a gun.

Too, appellant has not shown any evidence of improper motive on the part of prosecution witnesses Belmes and Agbulos that would have driven them to falsely testify against him. In fact, appellant himself declared that he did not know of any reason why Belmes and Agbulos would implicate him in the crime. Where there is nothing to show that the witnesses for the prosecution were actuated by improper motive, their positive and categorical declarations on the witness stand under the solemnity of an oath deserve full faith and credence.[15]

Interjected as a defense is alibi, appellant claiming that he went to Palao, Baddek, Bangued, Abra to visit his friends in the morning of April 22, 1988 and returned home only at around 5:30 p.m. For alibi to prosper, however, the hornbook rule requires a showing that the accused was at another place at the time of the perpetration of the offense and that it was physically impossible for him to be at the scene of the crime at the time of its commission.[16] Where there is even the least chance for the accused to be present at the crime scene, the defense of alibi will not hold water.[17]

Here, the evidence shows that Palao, Baddek, Bangued, Abra where appellant allegedly visited his friends was only 30 minutes drive from Barangay Kimmalasag, San Isidro, Abra where the crime was committed. In short, appellant failed to establish by clear and convincing evidence the physical impossibility of his presence at the scene of the crime on the date and time of its commission.

The weakness of appellant's alibi is heavily underscored by the fact that appellant was positively identified by witnesses Belmes and Agbulos who were with the victims at the time of the incident. For sure, appellant's positive identification as the perpetrator of the crime renders his defense of alibi unworthy of credit.[18]

The crime committed by appellant was correctly characterized by the appellate court as Robbery with Homicide under Article 294, paragraph 1 of the Revised Penal Code (RPC) which reads:

> Art. 294. Robbery with violence against or intimidation of persons – Penalties.– Any person guilty of robbery with the use of violence against 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, or when the robbery shall have been accompanied by rape or intentional mutilation or arson.

To warrant conviction for the crime of Robbery with Homicide, the prosecution is burdened to prove the confluence of the following elements:

> (1) the taking of personal property is committed with violence or intimidation against persons;
>
> (2) the property taken belongs to another;
>
> (3) the taking is characterized by intent to gain or animo lucrandi; and
>
> (4) by reason of the robbery or on the occasion thereof, homicide is committed.[19]

In Robbery with Homicide, so long as the intention of the felon is to rob, the killing may occur before, during or

after the robbery. It is immaterial that death would supervene by mere accident, or that the victim of homicide is other than the victim of robbery, or that two or more persons are killed. Once a homicide is committed by reason or on the occasion of the robbery, the felony committed is the special complex crime of Robbery with Homicide.[20]

Here, the prosecution adduced proof beyond reasonable doubt that appellant, having lost to Winner Agbulos in the game of poker, intended to divest Agbulos of his winnings amounting to P20,000.00. In pursuit of his plan to rob Agbulos of his winnings, appellant shot and killed him as well as his companion, Eddie Quindasan.

The prescribed penalty for Robbery with Homicide under Article 294 of the RPC, as amended by R.A. No. 7659 (Death Penalty Law), is reclusion perpetua to death. In the application of a penalty composed of two indivisible penalties, like that for Robbery with Homicide, Article 63 of the RPC provides that "when in the commission of the deed there is present only one aggravating circumstance, the greater penalty shall be applied." In this case, the aggravating circumstance of treachery attended the commission of the crime, as appellant's attack on the victims who were then unsuspectingly walking on their way home was sudden and done without any provocation, thus giving them no real chance to defend themselves.

However, considering that the crime was committed in 1988 or prior to the effectivity of R.A. No. 7659,[21] the trial court and the CA correctly imposed upon appellant the lesser penalty of reclusion perpetua.

The Court feels, however, that the two courts below erred in convicting appellant of the separate crime of attempted murder for the shooting of PO William Belmes. Attempted homicide or attempted murder committed during or on the occasion of the robbery, as in this case, is absorbed in the crime of Robbery with Homicide which is a special complex crime that remains fundamentally the same regardless of the number of homicides or injuries committed in connection with the robbery.[22]

We now come to the award of damages.

Conformably with existing jurisprudence, the heirs of Winner Agbulos and Eddie Quindasan are each entitled to civil indemnity in the amount of P50,000.00,[23] to moral damages in the amount of P50,000.00,[24] and to exemplary damages in the sum of P25,000.00.[25]

With respect to actual damages, Winner's father, Vidal Agbulos, testified that he spent a total of P50,000.00 as burial expenses but he failed to present receipts therefor. In People v. Abrazaldo,[26] we laid down the doctrine that where the amount of actual damages for funeral expenses cannot be determined because of the absence of receipts to prove them, temperate damages may be awarded in the amount of P25,000.00. Thus, in lieu of actual damages, temperate damages in the amount of P25,000.00 must be awarded to the heirs of Winner because although the exact amount was not proved with certainty, it was reasonable to expect that they incurred expenses for the coffin and burial of the victim. We, however, cannot grant the same to the heirs of Eddie Quindasan for their failure to testify on the matter. Finally, appellant is obliged to return to the heirs of Winner Agbulos the amount of P20,000.00 he had taken from Winner.

WHEREFORE, the decision dated February 22, 2006 of the CA in CA-G.R. CR-H.C. No. 00968 is hereby AFFIRMED with the following MODIFICATIONS:

- Appellant Juan Cabbab, Jr. is found GUILTY beyond reasonable doubt of Robbery with Homicide and sentenced to suffer the penalty of reclusion perpetua.

- Appellant is hereby ordered to return to the heirs of Winner Agbulos the amount of P20,000.00 representing the amount stolen from him. He is likewise ordered to indemnify the heirs of Winner Agbulos the following: (a) P50,000.00 as civil indemnity; (b) P50,000.00 as moral damages, (c) P25,000.00 as exemplary damages;

Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

and (c) P25,000.00 as temperate damages.

- Appellant is further ordered to pay the heirs of Eddie Quindasan P50,000.00 as civil indemnity, another P50,000.00 as moral damages, and P25,000.00 as exemplary damages.

- For reasons herein stated, appellant is ACQUITTED of the separate crime of attempted murder against the person of PO William Belmes.

Costs de oficio.

SO ORDERED.

Puno, C.J., (Chairperson), Corona, and Azcuna, JJ., concur.
Sandoval-Gutierrez, J., on leave.

---

[1] Penned by Associate Justice Monina Arevalo-Zenarosa, with Associate Justice Andres B. Reyes, Jr. and Associate Justice Rosmari D. Carandang, concurring; rollo, pp. 3-24.

[2] G.R. Nos. 147678-87, July 4, 2004, 433 SCRA 640.

[3] In our Resolution of August 30, 2004.

[4] CA Rollo, p. 12.

[5] CA Rollo, pp. 134-154.

[6] CA Rollo, pp. 27-34.

[7] CA Rollo, p. 131.

[8] Supra note 3.

[9] Rollo, p. 29.

[10] TSN, April 15, 1993, pp. 17-19.

[11] TSN, April 15, 1993, pp. 14-15.

[12] People v. Escote, Jr., G.R. No. 140756, April 4, 2003, 400 SCRA 603.

[13] TSN, June 13 1991, pp. 7-8.

[14] People v. Oliano, G.R. No. 119013, March 6, 1998, 287 SCRA 158.

[15] People v. Benito, G.R. No. 128072, February 19, 1999, 303 SCRA 468.

[16] People v. Gonzales, G.R. No. 141599, June 29, 2004, 433 SCRA 102.

[17] People v. Lopez, G.R. No. 149808, November 27, 2003, 416 SCRA 542.

[18] People v. Herbieto, G.R. No. 103611, March 13, 1997, 269 SCRA 472.

[19] People v. Daniela, G.R. No. 139230, April 24, 2003, 401 SCRA 519.

[20] People v. De Jesus, G.R. No. 134815, May 27, 2004, 429 SCRA 384.

[21] Approved on December 31, 1993.

Study hands-free: podcast-style lessons with read-along highlighting - batas.org

[22] People v. Cabilto, G.R. Nos. 128816 & 139979-80, August 8, 2001, 362 SCRA 325.

[23] People v. Escote, Jr., G.R. No. 140756, April 4, 2003, 400 SCRA 603.

[24] People v. Daniela, G.R. No. 139230, April 24, 2003, 401 SCRA 519.

[25] People v. Werba, G.R. No. 144599, June 9, 2004, 431 SCRA 482.

[26] G.R. No. 124392, February 6, 2003, 397 SCRA 137.

Turn this case into an audio lecture - facts, issues, ruling and doctrine - at batas.org

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.