

PEOPLE OF THE PHILIPPINES, APPELLEE, VS. ALBERT TEÑOSO Y LOPEZ ALIAS “PAKING” AND EDGARDO COCOTAN ALIAS “PAOT,” APPELLANTS.

G.R. No. 188975. July 05, 2010

Ponente: MENDOZA, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-188975/>

MENDOZA, J.:

At bench is an appeal from the March 19, 2009 Decision of the Court of Appeals[1] affirming with modification the February 7, 2007 Decision[2] of the Regional Trial Court, Tayug, Pangasinan, Branch 51. The RTC convicted the accused of the crime of Murder and sentenced both of them to suffer the penalty of reclusion perpetua and to indemnify, in solidum, the heirs of the victim in the liquidated sum of P300,000.00 as stipulated, and to pay the costs.[3]

In addition to what the RTC had imposed, the Court of Appeals ordered the accused to pay the heirs of the victim the amount of P50,000.00 as moral damages.

THE FACTS:

Accused Albert Teñoso and Edgardo Cocotan were charged with the crime of Murder.[4] The Information[5] indicting them reads:

That on or about March 20, 2004, in the morning, along Ylarde and Zamora St., municipality of San Nicolas, province of Pangasinan, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, with intent to kill, armed and with the use of unlicensed firearm with treachery and evident premeditation, conspiring, confederating and helping one another, did then and there willfully, unlawfully and feloniously shoot ROSITO SAMBRANO @ Jongjong at his back which caused his death, to the damage and prejudice of the heirs of said ROSITO SAMBRANO @ JONG-JONG.

CONTRARY to Article 248 of the Revised Penal Code in relation to Republic Act 8294.

The evidence for the prosecution showed that in the morning of March 20, 2004, Rosito Sambrano, also known as "Jongjong," was asked by Rebecca Saldivar to bring her 6-year-old son, Leoncio Saldivar IV, to Barangay Siblot, San Nicolas, Pangasinan; that Jongjong and Leoncio rode a motorcycle with Leoncio seated in front of Jongjong; that when they were near the public market, a shot was heard and they fell; that Albert Teñoso alias "Paking" and Edgardo Cocotan alias "Paot" approached them and held Jongjong by his two arms; that they then mauled him and, later, shot him; and that thereafter, Leoncio reported to his mother saying, "Mama, Kuya Jongjong (is) already dead. He was killed by Kuya Paot." [6]

In his defense, accused Teñoso admitted that he was in the vicinity when the shooting occurred, but denied any participation therein. He claimed that on that day, he and Paot were summoned by Mayor Christopher Jones Rodrigo to put up a streamer in front of the public market; that at the market, he asked Paot to get a ladder from a fire station about 40 meters away; that later, he heard shouts and saw people running; that he went near the place

of the commotion and there he saw Paot fighting with someone he did not know; that the two were grappling for a gun until he heard an explosion followed by successive blasts; that when the two separated, he saw a gun on the pavement, picked it up, boarded a tricycle, and went home; and that he was brought to the police station where he surrendered the gun.[7]

On his part, Cocotan asserted that he did not kill Jong Sambrano; that he was hired as a personal driver and security of then Mayor Rodrigo; that at that time, he and Teñoso were asked to hang a streamer at the tricycle terminal; that while on his way to get a ladder from a nearby fire station, a motorcycle driven by Jongjong stopped near him; that they then stared at each other; that he sensed that Jongjong was about to draw a gun from his waistline; that upon seeing this, he immediately held Jongjong's waist causing the latter to fall down from his motorcycle; that as Jongjong attempted to get his gun, he got hold of its nozzle; that when Jongjong pulled the trigger, the bullet hit him on his left toe; and that, thereafter, he heard a shot from behind him and then they got separated from each other.[8]

The trial court gave weight to the evidence of the prosecution over that of the defense, and convicted the accused of the crime of Murder in its February 7, 2007 Decision.[9]

Aggrieved, the accused appealed the said decision to the Court of Appeals. In the Appellants' Brief,[10] the accused prayed for their exoneration anchored on the following:

"ASSIGNMENT OF ERRORS

I

THE COURT A QUO GRAVELY ERRED IN FINDING ACCUSED-APPELLANTS GUILTY DESPITE THE PROSECUTION'S FAILURE TO PROVE THEIR GUILT BEYOND REASONABLE DOUBT.

II

THE COURT A QUO GRAVELY ERRED IN DISREGARDING THE VERSION OF THE ACCUSED-APPELLANTS AND INSTEAD RELYING HEAVILY ON THE INCONSISTENT TESTIMONIES OF THE PROSECUTION WITNESSES.

III

THE COURT A QUO GRAVELY ERRED IN CONVICTING ACCUSED-APPELLANT ALBERT TEÑOSO NOTWITHSTANDING THE DUBIOUSNESS OF HIS IDENTIFICATION.

IV

THE COURT A QUO GRAVELY ERRED IN CONSIDERING THE ATTENDANCE OF QUALIFYING CIRCUMSTANCES OF TREACHERY AND EVIDENT PREMEDITATION.

V

THE COURT A QUO GRAVELY ERRED IN FINDING THE PRESENCE OF THE AGGRAVATING CIRCUMSTANCE OF USE OF UNLICENSED FIREARM.

VI

THE COURT A QUO GRAVELY ERRED IN FINDING THAT ACCUSED-APPELLANTS CONSPIRED TO COMMIT THE OFFENSE CHARGED.

VII

THE COURT A QUO GRAVELY ERRED IN DISREGARDING THE RESULT OF THE PARAFFIN TEST CONDUCTED ON ACCUSED-APPELLANT ALBERT TEÑOSO.

VIII

THE COURT A QUO GRAVELY ERRED IN DISREGARDING THE VOLUNTARY SURRENDER OF THE FIREARM BY ACCUSED-APPELLANT ALBERT TEÑOSO."[11]

As earlier stated, on March 19, 2009, the Court of Appeals rendered the assailed Decision[12] affirming with modification the RTC Decision. It wrote:

We find the appeal bereft of merit.

In the main, accused-appellants anchor their arguments on the credibility of the prosecution's witnesses whose testimonies were replete with discrepancies. They assert that the trial court erred in giving credence to the respective eye-witness accounts of Saldivar IV and Torio alleging that the same were laden with inconsistencies and that the identification given was uncertain and vague. They further contend that the out-of-court identification made by Saldivar IV was suggestive and hence, should be disregarded. They also impute error on the part of the trial court in disregarding the results of the paraffin tests on Teñoso and failure to present in evidence the firearm allegedly used by them. They contend that the mitigating circumstance should have been appreciated in favor of accused-appellant Teñoso. Lastly, they insist that the trial court erred in considering the qualifying circumstances of treachery, evident premeditation and use of unlicensed firearm since the prosecution failed to prove the same.

We are not persuaded.

On the issue of credibility of a witness, the well-established rule is that the assessment of credibility of the witness is a matter best assigned to the trial court which had the firsthand opportunity to hear the testimonies of the witnesses and observe their demeanor, conduct and attitude during cross-examination. Such matters cannot be gathered from a mere reading of the transcripts of stenographic notes. Hence, the trial court's findings carry great weight and will be sustained by the appellate court unless the trial court overlooked, misunderstood, or misapplied some facts or circumstances of weight and substance which will alter the assailed decision or affect the outcome of the case. The exception finds no application in the case before Us.

In challenging the reliability of the prosecution witnesses, accused-appellants labor on unfounded and tenuous arguments which will find no approval from this Court. As We see it, the eye-witness accounts of Torio and Saldivar IV were clear and unequivocal in pointing to both accused-appellants as the victim's attackers on the fateful morning of 20 March 2004.

x x x x x x x x

Accused-appellants cannot also harp on the varying statements of the child-witness with respect to whether he was playing or not before they left their house or the fact that the child-witness did not immediately relate his experience to his mother as soon as he saw her. Being collateral matters, these have no bearing on the commission of the crime and will not render his entire testimony unworthy of belief. As previously held by the Supreme Court, the testimony of children of sound mind is likely to be more correct and truthful than that of older persons, so that once established that they have fully understood the character and nature of an oath, their testimony should be given full credence. In the same vein, the perceived contradictions with regard to the estimated distance between the witness and the victim or how far the latter was able to run after the mauling are insignificant details that cannot damage the entirety of Torio's testimony.

Neither will the disparity on the testimony of each witness with respect to the number of shots heard by them, have an effect on the veracity of their eye-witness' accounts considering that they were situated differently from the other. It should be stressed that the same incident, when viewed from different angles or perspectives,

may result in different impressions on the part of several witnesses. The circumstances attending the incident may add to the confusion, as in the case at bar, where the quarry attempted to escape and the policemen all made an effort to detain him. Recollection of a particular happening, especially if it is unquiet or even tumultuous, is at best imperfect but not necessarily perjurious. The narration of the same event by different witnesses cannot be expected to be absolutely symmetrical, with all of them agreeing fully on every detail, as if recorded in their minds with computer accuracy.

Anent Saldivar IV's alleged vague description and out-of-court identification of Teñoso, suffice it to state that whatever perceived vagueness or irregularity there were in the identification of Teñoso had been cured by the subsequent positive identification in court of Teñoso not only by Saldivar IV, despite the attempt of the trial judge to mislead the child witness by pointing to another person, but also by witness Torio. Thus, as previously held by the Supreme Court, the 'inadmissibility of a police line-up identification . . . should not necessarily foreclose the admissibility of an independent in-court identification.'

Thus, on the face of the categorical and unmistakable identification made by the witnesses for the prosecution, We find that the prosecution was able to establish beyond any tinge of doubt that Teñoso and Cocotan were responsible for the death of Sambrano. In the light of their positive identification and the credible accounts of the events leading to the victim's demise, their respective defenses of denial, cannot overcome his positive identification by the eyewitnesses. A mere denial, like alibi, is inherently a weak defense and constitutes self-serving negative evidence which cannot be accorded greater evidentiary weight than the declaration of credible witnesses who testify on affirmative matters. This is especially true since We do not find any reason why the Saldivars would involve their 6-year old son in this whole ordeal if not for their earnest effort to attain justice.

Also, the seeming nonchalant actuation of Teñoso in picking-up the gun after the victim was gunned down and the flight of Cocotan to evade arrest, all the more fortify their guilt for the death of Sambrano. Moreover, the fact that Teñoso was found negative for the presence of gunpowder nitrates will not, by itself, prove his innocence. As held in *People v. Manalo*,

"The second assigned error would stress the alleged absence of physical evidence showing that the accused-appellant fired a gun. To this, We need only remark that such circumstance neither proves his innocence as well. In fact, even if he were subjected to a paraffin test and the same yields a negative finding, it cannot be definitely concluded that he had not fired a gun as it is possible for one to fire a gun and yet be negative for the presence of nitrates as when the hands are washed before the test (*People v. Talingdan*, 191 SCRA 333 [1990]; *People v. Roallos*, 113 SCRA 584 [1982]). The Court has even recognized the great possibility that there will be no paraffin traces on the hand if, as in the instant case, the bullet was fired from a .45 Caliber pistol (*People v. Rebullar*, 188 SCRA 838 [1990])."

Finding the culpability of accused-appellants duly proven beyond reasonable doubt, We find that, among those alleged in the Information, only the qualifying circumstances of treachery was duly proven by the prosecution.

An unexpected and sudden attack under circumstances which render the victim unable and unprepared to defend himself by reason of the suddenness and severity of the attack, constitutes *alevosia*. For treachery or *alevosia* to be appreciated as a qualifying circumstance, the prosecution must establish the concurrence of two (2) conditions: (a) that at the time of the attack, the victim was not in a position to defend himself; and (b) that the offender consciously adopted the particular means, method or form of attack employed by him. Given the factual milieu of the present case, the prosecution was able to prove that the victim was shot while on board his motorcycle. The attack was undoubtedly swift and sudden which did not afford him any opportunity to defend himself. As the attack was without any forewarning, the victim, after having fallen from his motorcycle, was assaulted by his attackers who acted in concert by restraining his hands to prevent him from retaliating. And even as the victim tried to flee, accused-appellants continued to pursue him even shooting him from behind. Indisputably, the victim

was killed with the presence of the qualifying circumstance of treachery.

Verily, accused-appellant Teñoso's claim that he is entitled to the mitigating circumstance of voluntary surrender, has no merit. It should be recalled that Teñoso left the public market right after the incident and waited in his house if someone will look for him. It was only after learning that he was indeed being sought after that he called the police not for the purpose of surrendering but only 'to explain.' In fact, when asked if it was his intention to surrender himself when he went to the police station, he denied the same and insisted that he only intended to surrender the firearm.

As this Court sees it, Teñoso's demeanor does not portray the voluntary surrender required under the law since it lacks the intent to unconditionally surrender himself to the authorities either as an acknowledgement of guilt or a desire to save the authorities the trouble and the expense that would necessarily be incurred in searching for and capturing the culprit. Jurisprudence has it that the act of surrender must be spontaneous, accompanied by an acknowledgment of guilt, or an intention to save the authorities the trouble and the expense that search and capture would require. Going to the police station 'to clear his name' does not show any intent of appellant to surrender unconditionally to the authorities.

Thus, the dispositive portion of the assailed Court of Appeals Decision reads:

WHEREFORE, the foregoing considered, the Appeal is hereby DISMISSED and the assailed Decision AFFIRMED with the MODIFICATION that accused-appellant, in addition to their civil liability, are each ordered to pay the heirs of the victim the amount of Fifty Thousand Pesos (P50,000.00) as moral damages.

Apparently not satisfied with the decision, the accused elevated their case to this Court. The accused filed a Manifestation (In Lieu of Supplemental Brief), that they were adopting the Appellants' Brief they filed before the Court of Appeals.[13] Plaintiff, on the other hand, moved and manifested that it would no longer file any Supplemental Brief and would also adopt its arguments in the Appellee's Brief previously filed.[14]

The Court resolves to deny the appeal.

No reversible error was committed by the Court of Appeals in rendering the well-written March 19, 2009 Decision.

In their brief, the accused have capitalized on the supposed inconsistencies in the testimony of prosecution witnesses. They pointed out that Arnold Torio had testified that Teñoso @ Paking held Jongjong's right hand while Cocotan @ Paot held the other hand[15] and both were punching his head and body. This went on for less than a minute. Thereafter, Teñoso, using his right hand, shot Jongjong.[16] Immediately, Torio heard two (2) explosions.[17]

Leoncio Salvador IV, on the other hand, testified that Teñoso held Jongjong's left arm while Cocotan held the other arm;[18] that they shot Jongjong at the back;[19] that Jongjong ran and Cocotan chased him while Teñoso shot him at the back; and that four shots were fired.[20]

The accused enumerated other inconsistencies, to wit: (1) Arnold Torio testified that the mauling took place right in front of him and his driver and the road ahead was clear and empty,[21] but he also mentioned that there were many people at the place where the mauling took place since it was a market day;[22] (2) He also stated that he saw the mauling incident at a distance of ten (10) meters,[23] but on cross-examination, he replied that he was about fifteen (15) meters from where the mauling took place;[24] (3) He further testified that after being beaten up, Jongjong was able to run for about ten (10) meters before he stumbled and got shot,[25] but later, he said that it was a distance of fifteen (15) meters;[26] and (4) Leoncio initially stated that Cocotan shot Jongjong but later he said that it was Teñoso who shot Jongjong at the back.[27]

The Court examined the inconsistencies in the testimonies of the prosecution witnesses but found them too inconsequential to adversely affect their overall integrity. Such minor inconsistencies in the narration of a witness do not detract from its essential credibility as long as it is in its entirety coherent and intrinsically believable. Inaccuracies may in fact suggest that the witness is telling the truth and has not been rehearsed as it is not to be expected that he will be able to remember every single detail of an incident with perfect or total recall.[28]

In this case, the cited discrepancies as to the distance, the number of shots and which hand was actually used in holding Jongjong were not too critical as to discredit altogether the testimonies of Arnold Tenorio and Leoncio Saldivar IV. These are minor details that cannot destroy the truthfulness of their story.

The accused also tried to sway the Court with the inconsistency in the statement of Leoncio Saldivar IV as to who actually shot the victim. The pertinent portions of his testimony read:

"PROS. BINCE:

Q:

What happened next after Paking and Paot were holding the hands of Kuya Jong Jong?

WITNESS:

A:

They shot him at the back.

COURT:

Questions from the Court.

Q:

How would you know the holding, carrying and shooting when according to you immediately upon the fall of that motorcycle you ran four (4) meters away to the basketball court?

A:

Because at first I was by the jeep and they were in front of the jeep.

Q:

Where is the jeep? Was it beside the motorcycle or to (sic) the basketball court where you were?

A:

Near the municipal hall, sir.

Q:

And was that motorcycle that fell also near the municipal hall?

A:

(Witness nodded).

Q:

Was that basketball court where you ran to also near the municipal hall?

A:

Yes, sir.

Q:

What kind of jeep was that? Was it a small owner type jeep which is long?

A:

It's a passenger jeep, sir.

Next question.

PROS. BINCE:

Q:

You claimed that Kuya Jong was shot. Who shot him?

A:

Paot.

COURT:

Q:

With what did Paot shoot?

WITNESS:

A:

I do not know.

COURT:

Q:

Was it a gun or a sling shot?

A:

A small gun.

Q:

Can you demonstrate the length?

A:

(Witness demonstrated a length of about six (6) inches.)

Q:

Was it made of wood or metal or what?

A:

A metal, sir.

PROS. BINCE:

Q:

What did Paking do when Paot shoot (sic) Kuya Jong, if any?

A:

Kuya Jong ran and he was chased.

Q:

Who chased Kuya Jong?

A:

Paot.

Q:

What about Paking? What did he do, if any?

A:

No, it was him who shot at the back.

COURT:

Q:

Who shot at the back?

A:

Paking.

Q:

Whose back did he shoot?

A:

Of Kuya Jong.

PROS. BINCE:

Q:

So it's now clear that it was Paking who shot Kuya Jong at the back and not Paot?

A:

Yes, sir."[29]

From the foregoing, the accused argues that there was an inconsistency in the sense that at one point, Leoncio stated that it was Paot (Cocotan) who shot Jongjong. Later, he pointed to Paking (Teñoso) as the gunman.

The Court is not persuaded. There is no inconsistency in the statement of Leoncio. It can be gleaned from Leoncio's testimony that Paot initially shot Jongjong. When the latter had the opportunity to stand and run, he was shot from behind by Paking. This seeming inconsistency only strengthens the story of Leoncio that the two accused took turns in shooting Jongjong.[30] It bears stressing too that Leoncio, being a child witness, cannot be expected to provide an accurate answer to every question asked.[31]

Most importantly, the trial court found Leoncio credible. The assessment by the trial court of his honesty and reliability is worth repeating:

Anent Saldivar IV's alleged vague description and out-of-court identification of Teñoso, suffice it to state that whatever perceived vagueness or irregularity there were in the identification of Teñoso had been cured by the subsequent positive identification in court of Teñoso not only by Saldivar IV, despite the attempt of the trial judge to mislead the child witness by pointing to another person, but also by witness Torio. x x x.[32]

The Court has considered the defense of denial and alibi put up by the accused,[33] but finds them relatively weak and insufficient to overcome the positive and categorical identification of the accused as perpetrators. The rule is that the defense of denial, when unsubstantiated by clear and convincing evidence, is negative and self-serving and merits no weight in law and cannot be given greater evidentiary value than the testimony of credible witnesses who testified on affirmative matters.[34]

Upon re-examination of the records, the Court is of the considered view that the qualifying circumstance of treachery was duly proven. The elements of treachery are: 1) the employment of means, methods or forms of execution that affords the person attacked no opportunity to defend himself or to retaliate; and 2) that said means, method or forms of execution were deliberately and consciously adopted.[35]

It was clearly shown that Jongjong was shot while on board his motorcycle. The attack was undoubtedly swift and sudden which did not afford him any opportunity to defend himself. After falling from his motorcycle, he was assaulted by the two accused who also restrained his hands to prevent him from retaliating. When he was able to free himself, they pursued him and then shot him from behind.

The award of civil indemnity is proper. It requires no proof other than the fact of death as a result of the crime and proof of the accused's responsibility therefor. Although jurisprudence fixed the civil indemnity at P50,000.00 only,[36] the Court upholds the award of P300,000.00 civil indemnity since the parties had stipulated such amount in the event of a judgment of conviction.[37]

The award of P50,000.00 as moral damages is also correct. Moral damages are awarded in view of the violent death of a victim. There is no need for any allegation or proof of the emotional sufferings of the heirs. Likewise, the award of exemplary damages is warranted when the commission of the offense is attended by an aggravating circumstance, whether ordinary or qualifying,[38] as in this case. Accordingly, the Court awards exemplary damages in the amount of P30,000.00[39] to the heirs of the victim.

WHEREFORE, the decretal portion of the March 19, 2009 Decision of the Court of Appeals in CA-G.R. CR-H.C. No. 02751 is MODIFIED to read as follows:

WHEREFORE, finding the accused guilty beyond reasonable doubt of the crime of Murder, the Court hereby sentences both of them to suffer the penalty of reclusion perpetua; to indemnify, jointly and severally, the heirs of Rosito Sambrano in the amount of P300,000.00 as civil indemnity, as stipulated; to pay, jointly and severally, the said heirs the amounts of P50,000.00 as moral damages, P30,000.00 as exemplary damages and the cost of the suit.

Both accused are further ordered to pay legal interest on the civil liabilities imposed until fully paid.

SO ORDERED.

Carpio, (Chairperson), Nachura, Peralta, and Abad, JJ., concur.

[1] CA rollo, pp. 183-201 penned by Associate Justice Josefina Guevarra-Salonga with Associate Justice Angelita

M. Romilla-Lontok and Associate Justice Romeo F. Barza concurring.

[2] Records, pp. 253-277.

[3] Records, p. 277.

[4] CA rollo, p. 184.

[5] Records, p.1.

[6] CA rollo, p. 185; TSN, April 26, 2004, pp. 6-7; TSN, May 18, 2004, pp. 3-6.

[7] Id. at 73, 188; TSN, August 10, 2005, pp. 2-7; TSN, September 14, 2005, pp. 2-4.

[8] Id. at 75, 189; TSN, August 14, 2006, pp. 2-7.

[9] Records, p. 277.

[10] CA rollo, pp. 65-118.

[11] Id. at 67-68.

[12] Id. at 183-204.

[13] See Rollo, pp. 38-41.

[14] See Rollo, pp. 34-37.

[15] CA rollo, p. 77; TSN, June 1, 2004, p. 5.

[16] Id., TSN, June 22, 2004, p. 3.

[17] Id., TSN, July 13, 2004, p. 3.

[18] Id., TSN, August 24, 2004, p. 6.

[19] Id., TSN, August 24, 2004, p. 7.

[20] Id., TSN, August 24, 2004, p. 8.

[21] Id., TSN, July 27, 2004, p. 11.

[22] Id. at 77-78, TSN, July, 27, 2004, p. 6.

[23] Id. at 78, TSN, June 22, 2004, p. 2.

[24] Id., TSN, August 4, 2004, p. 7.

[25] Id., TSN, July 13, 2004, p. 2.

[26] Id., TSN, July 27, 2004, p. 9.

[27] Id., TSN, August 24, 2004, pp. 7-8.

[28] Sayoc v. People, G.R. No. 157723, April 30, 2009, 587 SCRA 266.

[29] TSN, August 24, 2004, pp. 7-8; (emphases supplied).

[30] CA rollo, p. 186; TSN, August 24, 2004, pp. 5-9.

[31] People v. De Leon, 387 Phil. 779 (2000).

[32] Rollo, pp. 16-17.

[33] Sayoc v. People, supra note 28.

[34] Domingo v. People, G.R. No. 186101, October 12, 2009.

[35] People v. Lumintigar, 424 Phil. 148 (2002).

[36] People v. Gutierrez, G.R. No. 188602, February 4, 2010.

[37] Records, p. 40.

[38] People v. Gutierrez, supra note 36.

[39] Id.

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.