

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. JACQUILINE PAMBID Y CORTEZ, ACCUSED-APPELLANT.

G.R. No. 192237. January 26, 2011

Ponente: VELASCO JR., J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-192237/>

VELASCO JR., J.:

The Case

This is an appeal from the November 27, 2009 Decision[1] of the Court of Appeals (CA) in CA-G.R. CR-H.C. No. 03400 entitled *People of the Philippines v. Jacqueline Pambid y Cortez*, which affirmed the February 19, 2008 Decision[2] in Criminal Case Nos. Q-03-121145-46 of the Regional Trial Court (RTC), Branch 82 in Quezon City. The RTC found accused Jacqueline Pambid y Cortez (Pambid) guilty of violating Sections 5 and 11, Article II of Republic Act No. (RA) 9165 or the Comprehensive Dangerous Drugs Act of 2002.

The Facts

In Criminal Case No. Q-03-121145, the charge against Pambid stemmed from the following Information:

That on or about the 18[th] day of September 2003, in Quezon City, Philippines, the said accused, not being authorized by law to sell, dispense, deliver, transport or distribute any dangerous drug, did, then and there, willfully and unlawfully sell, dispense, deliver, transport, distribute or act as broker in the said transaction, ZERO POINT FOURTEEN (0.14) gram of white crystalline substance containing Methylamphetamine Hydrochloride, a dangerous drug.

Contrary to law.[3]

In Criminal Case No. Q-03-121146, the Information reads:

That on or about the 18[th] day of September 2003, in Quezon City, Philippines, the said accused, not being authorized by law to possess or use any dangerous drug, did, then and there, willfully, unlawfully and knowingly have in her/his/their possession and control, ZERO POINT ZERO EIGHT (0.08) gram of white crystalline substance containing Methylamphetamine Hydrochloride, a dangerous drug.

Contrary to law.[4]

On April 14, 2004, Pambid was arraigned with the assistance of her counsel, and she pleaded not guilty to both charges.[5] Upon the joint motion of counsel for the accused and the trial prosecutor on June 7, 2004, the pre-trial was terminated and the cases were then set for trial on the merits.[6]

During the trial, the prosecution and defense stipulated on the intended testimonies of prosecution witnesses Police Inspector Bernardino Banac, Jr. (P/Insp. Banac, Jr.), Police Officer 1 Oliver Estrelles (PO1 Estrelles), and Police Officer 2 Edmond Paculdar (PO2 Paculdar), to wit:

(1) Stipulated testimony of P/Insp. Banac, Jr.:

x x x that he is Forensic Chemist of the Philippine National Police; that his office received a request for laboratory examination marked as Exhibit 'A'; that together with said request was a brown envelope marked as Exhibit 'B' which contained two (2) plastic sachets marked as Exhibits 'B-1' and 'B-2'; that he thereafter conducted the requested laboratory examination and, in connection therewith, he submitted a Chemistry Report marked as Exhibit 'C'; the findings thereon showing the specimen positive for methylamphetamine hydrochloride was marked as Exhibit 'C-1' and the signature of said police officer was marked as Exhibit 'C-2'; that he then issued a Certification marked as Exhibit 'C-3' and thereafter turned over the specimen to the Evidence Custodian and retrieved the same for the trial scheduled today.[7]

(2) Stipulated testimony of PO1 Estrelles:

x x x that he was the investigator assigned to investigate this case; that in connection therewith, he took the Affidavit of PO2 Michael Collado and PO1 Edmund Paculdar marked as Exhibits 'D' and 'D-1'; that the specimens subject of this case marked as Exhibit 'B-1' and 'B-2' were turned over to him; that he prepared a request for laboratory examination marked as Exhibit 'A' and in connection therewith he received a Chemistry Report marked as Exhibit 'C'; that the buy bust money marked as Exhibit 'E' and 'F' was likewise turned over to him; that he submitted the accused for drug test and in connection therewith he received the Chemistry Report marked as Exhibit 'G'; that after collating all the documents including the Pre-Operation Report marked as Exhibit 'H', he prepared the letter referral to the Office of the City Prosecutor, Quezon City marked as Exhibits 'I' and 'I-1'. [8]

(3) Stipulated testimony of PO2 Paculdar:

x x x that said police officer assisted PO2 Michael Collado in arresting the accused; that he saw the evidence subject of these cases only at the police station; that said police officer, together with his companions conducted the operation on September 18, 2003 at 9:20 p.m. along 23 J.P. Laurel St., T.S. Cruz Subdivision, Brgy. San Agustin, Novaliches, Quezon City.[9]

Thereafter, the prosecution presented the testimony of PO2 Michael Collado (PO2 Collado).

On the other hand, the defense presented Pambid, Cristina Parama (Parama), and Julieta San Jose (San Jose) as its witnesses.

The Prosecution's Version of Facts

On September 18, 2003, at around 6 o'clock in the evening, a confidential informant arrived at the Station Anti-Illegal Drugs (SAID), Station 4, Novaliches, Quezon City. The informant reported to the SAID Chief, Chief Superintendent Nilo Wong (C/Supt. Wong), the illegal drug activities of alias "Jack" and "Junior Laurel." Accordingly, a buy-bust team was formed composed of C/Supt. Wong, Senior Police Officer Mario Concepcion, PO2 Paculdar, PO2 Noel Magcalayo, PO2 Andy Salonga (PO2 Salonga), PO2 Cesar Collado, PO1 Estrelles, PO1 Bucatcat, and PO2 Collado.[10] Likewise, a Pre-Operation Report was made.

The team proceeded to J.P. Laurel St., T.S. Cruz Subdivision, Barangay San Agustin, Novaliches, Quezon City and arrived there at around 9:10 in the evening. PO2 Collado then alighted from the vehicle and, along with the informant, proceeded to the house of alias "Jack," who was later identified as Pambid. They saw Pambid standing at the door of the house. The informant then introduced PO2 Collado to Pambid and told the latter that PO2 Collado needed PhP 200 worth of "panggamit." In response, Pambid gave PO2 Collado a plastic sachet containing white crystalline substance. PO2 Collado gave the PhP 200 to Pambid, and after the latter received the money, PO2 Collado executed the pre-arranged signal by scratching his head.[11]

PO2 Collado introduced himself to Pambid as a policeman, recovered another plastic sachet from her left hand, and arrested her. They then brought her to the station. At the station, PO2 Collado turned over the money and the

plastic sachets to the investigator, PO1 Estrelles.[12] A request for laboratory examination was then prepared and the plastic sachets were sent to the Philippine National Police (PNP) Crime Laboratory, Central Police District Crime Laboratory Office in Doña Aurora Building, EDSA, Kamuning, Quezon City.[13] Subsequently, P/Insp. Banac, Jr. issued Chemistry Report No. D-1007-03 with the following results:

SPECIMEN SUBMITTED:

Two (2) heat-sealed transparent plastic sachets containing white crystalline substance having the following markings and recorded net weights:

A (MBC) = 0.14 gram B (MBC) = 0.08 gram

x x x x

PURPOSE OF LABORATORY EXAMINATION:

To determine the presence of any dangerous drug. x x x

FINDINGS:

Qualitative examination conducted on the above-stated specimen gave POSITIVE result to the test for Methylamphetamine Hydrochloride, a dangerous drug. x x x

CONCLUSION:

Specimens A and B contain Methylamphetamine Hydrochloride, a dangerous drug. [14] x x x

Version of the Defense

In contrast, Pambid interposed the defense of denial. She testified that on September 18, 2003, at around 5:30 p.m., she was preparing milk for her two-year old child when she was arrested.[15]

She recalled that when she heard a vehicle park outside her house, she opened the door and saw policemen who suddenly entered her house. She asked them why they were entering the house but they did not answer. She knew them to be PO2 Collado, PO1 Estrelles, PO2 Paculdar, C/Supt. Wong, PO2 Salonga and others because they eat in the carinderia or foodhouse in their area. They searched her house for about 20 minutes but found nothing. At which point, PO2 Paculdar pulled her out of the house while she was carrying her child and brought her to their vehicle. PO2 Collado asked her if she had any money to which she replied that she had money only for milk and diapers.[16] PO2 Collado took the money amounting to PhP 1,200. He stapled the two PhP 100 bills on a bond paper and pocketed the rest.[17] Afterwards, she was brought to the office of C/Supt. Wong while her child was sent home by PO2 Collado. She was then detained and later presented on inquest.[18]

The testimony of Parama is corroborative of the story of Pambid. Parama stated that on September 18, 2003 at exactly 5:30 p.m. in the afternoon, she was with Pambid, her son and her sister, Baby San Jose, at 23 J.P. Laurel, T.S. Cruz Subdivision, Novaliches, Quezon City. After conversing, Pambid went to her house and prepared milk for her son when policemen in civilian clothes entered the house and insisted to get the shabu which Pambid allegedly sells. The policemen then brought Pambid outside whereupon Pambid asked Parama to follow her to the precinct but she was unable to do so.[19]

Likewise, San Jose testified that on September 18, 2003, at about 5:00 p.m. in the afternoon, she was alone at home when she saw several men alight from a vehicle, a Ford Fiera.[20] The men proceeded to the house of her aunt, Flor San Jose, and started to search for something.[21] When they went out of the house, Pambid was already handcuffed.[22] She followed Pambid to the headquarters in Novaliches, Quezon City.

Ruling of the Trial Court

After trial, the RTC, on February 19, 2008, found Pambid guilty of the charges. The dispositive portion of its Decision reads:

WHEREFORE, premises considered, judgment is hereby rendered as follows:

a) Re: Criminal Case No. Q-03-121145, the Court finds accused JACQUILINE PAMBID y CORTEZ guilty beyond reasonable doubt of a violation of Section 5, Article II of R.A. No. 9165. Accordingly, she is hereby sentenced to suffer the penalty of LIFE IMPRISONMENT and to pay a fine in the amount of FIVE HUNDRED THOUSAND (P500,000.00) PESOS.

b) Re: Criminal Case No. Q-03-121146, the same accused is likewise found guilty beyond reasonable doubt of a Violation of Section 11, Article II of the same Act, and accordingly hereby sentences her to suffer the indeterminate penalty of imprisonment of TWELVE (12) YEARS and ONE (1) DAY as Minimum to FOURTEEN (14) YEARS as Maximum and to pay a fine in the amount of THREE HUNDRED THOUSAND (P300,000.00) PESOS.

SO ORDERED.[23]

On appeal to the CA, Pambid disputed the trial court's decision finding her guilty beyond reasonable doubt of the violations. She argued that the RTC erred in admitting the seized dangerous drugs as evidence, considering that no proper inventory was taken of the seized drugs and that there was a break in the chain of custody of the evidence. Further, she contended that the police officers failed to read her rights to her as mandated by the Constitution.

Ruling of the Appellate Court

On November 27, 2009, the CA affirmed the judgment of the RTC. The dispositive portion of the CA Decision reads:

WHEREFORE, the foregoing considered, the appeal is DENIED. The Decision of the RTC dated February 19, 2008 is hereby AFFIRMED.

SO ORDERED.[24]

Accused-appellant Pambid timely filed a notice of appeal from the decision of the CA.

The Issues

Accused-appellant assigns the following errors in her Brief:

I.

The trial court gravely erred in convicting the accused-appellant despite the non-compliance with the requirements for the proper custody of seized dangerous drugs as provided under R.A. No. 9165.

II.

The trial court gravely erred in giving full weight and credence to the prosecution's evidence notwithstanding its failure to prove the integrity and identity of the shabu allegedly seized.

III.

The trial court gravely erred in convicting the accused-appellant based solely on PO2 Michael Collado's testimony.

In addition, she assigns the following errors in her Supplemental Brief:

I.

The Honorable Court of Appeals committed a reversible error in convicting the accused-appellant despite non-compliance with the requirements for the proper custody of seized dangerous drugs under R.A. No. 9165.

II.

The Honorable Court of Appeals gravely erred in giving full weight and credence to the prosecution's evidence notwithstanding its failure to prove the integrity of the seized drug.

Our Ruling

The appeal has no merit.

Essentially, accused-appellant pegs almost all of her arguments on the fact that the police officers failed to properly mark, inventory, and photograph the prohibited items allegedly seized from her. She argues that as a result of this failure, there is doubt as to the identity and integrity of the drugs and that there was a break in the chain of custody of the evidence.

Such argument cannot prosper.

The Implementing Rules and Regulations (IRR) of RA 9165 provides:

SECTION 21. Custody and Disposition of Confiscated, Seized and/or Surrendered Dangerous Drugs, Plant Sources of Dangerous Drugs, Controlled Precursors and Essential Chemicals, Instruments/Paraphernalia and/or Laboratory Equipment.--The PDEA shall take charge and have custody of all dangerous drugs, plant sources of dangerous drugs, controlled precursors and essential chemicals, as well as instruments/paraphernalia and/or laboratory equipment so confiscated, seized and/or surrendered, for proper disposition in the following manner:

(a) The apprehending officer/team having initial custody and control of the drugs shall, immediately after seizure and confiscation, physically inventory and photograph the same in the presence of the accused or the person/s from whom such items were confiscated and/or seized, or his/her representative or counsel, a representative from the media and the Department of Justice (DOJ), and any elected public official who shall be required to sign the copies of the inventory and be given a copy thereof; Provided, that the physical inventory and photograph shall be conducted at the place where the search warrant is served; or at the nearest police station or at the nearest office of the apprehending officer/team, whichever is practicable, in case of warrantless seizures; Provided, further, that non-compliance with these requirements under justifiable grounds, as long as the integrity and evidentiary value of the seized items are properly preserved by the apprehending officer/team, shall not render void and invalid such seizures of and custody over said items x x x. (Emphasis supplied.)

Evidently, the law itself lays down exceptions to its requirements. Thus, non-compliance with the above-mentioned requirements is not fatal. In fact, it has been ruled time and again that non-compliance with Sec. 21 of the IRR does not make the items seized inadmissible.[25] What is imperative is "the preservation of the integrity and the evidential value of the seized items as the same would be utilized in the determination of the guilt or innocence of the accused." [26]

In the instant case, the chain of custody can be easily established through the following link: (1) PO2 Collado marked the seized sachets subject of the buy-bust with "MBC," his own initials; (2) a request for laboratory examination of the seized items marked "MBC" was signed by C/Supt. Wong; [27] (3) the request and the marked items seized were received by the PNP Crime Laboratory; (4) Chemistry Report No. D-1007-03 confirmed that

the marked items seized from accused-appellant were methylamphetamine hydrochloride;[28] and (5) the marked items were offered in evidence as Exhibits "B-1" and "B-2." [29]

Hence, it is clear that the integrity and the evidentiary value of the seized drugs were preserved. This Court, therefore, finds no reason to overturn the findings of the trial court that the drugs seized from accused-appellant were the same ones presented during trial. Accordingly, it is but logical to conclude that the chain of custody of the illicit drugs seized from accused-appellant remains unbroken, contrary to the assertions of accused-appellant.

Lastly, accused-appellant contends that the trial court erred in convicting her based on the sole testimony of PO2 Collado. We disagree.

Well-settled is the rule that "the testimony of a lone prosecution witness, as long as positive and clear and not a result of improper motive to impute a serious offense against the accused, deserves full faith and credit." [30] It is sufficient to prove the guilt of the accused beyond reasonable doubt.

Here, PO2 Collado was able to clearly and directly narrate the circumstances of the buy-bust operation conducted against accused-appellant which subsequently led to her arrest. Further, no ill motive was proved by the defense on the part of PO2 Collado and the rest of the police officers to falsely impute such a serious crime against her. As such, the presumption of regularity in the performance of official duty must prevail.

What is more, "the factual findings of the trial court, when adopted and confirmed by the CA, are binding and conclusive on this Court and will generally not be reviewed on appeal." [31] As aptly held in *People v. Obina*, "In criminal cases, the evaluation of the credibility of witnesses is addressed to the sound discretion of the trial judge, whose conclusion thereon deserves much weight and respect, because the judge has the direct opportunity to observe them on the stand and ascertain if they are telling the truth or not." [32] Hence, We see no reason to deviate from the findings of the trial court.

Essentially, all the elements of the crime of illegal sale of drugs have been sufficiently established, i.e., (1) the identity of the buyer and the seller, the object of the sale, and the consideration; and (2) the delivery of the thing sold and the payment for it. [33] What is material is the proof that the transaction or sale actually took place. The delivery of the illicit drug to the poseur-buyer and the receipt by the seller of the marked money successfully consummate the buy-bust transaction.

In this case, the prosecution was able to establish these elements beyond moral certainty. Accused-appellant sold the shabu for PhP 200 to PO2 Collado posing as buyer; the said drug was seized and identified as a prohibited drug and subsequently presented in evidence; there was actual exchange of the marked money and contraband; and finally, accused-appellant was fully aware that she was selling and delivering a prohibited drug. This was clearly shown in the testimony of PO2 Collado, viz:

Q: What happened when you reported for duty on that date, Mr. Witness?

A: Nothing, sir. At 6:00 p.m. a confidential informant appeared to our station, sir.

Q: What happened when this confidential informant appeared in your office?

A: The confidential informant went to our SAID chief, Chief/Supt. Nilo Wong, and reported to him that there was an illegal drug activity, sir.

x x x x

Q: What did this Wong do after being informed by the confidential informant?

A: We waited to form our team and we waited for 9:00 a.m., sir.

x x x x

Q: What is the purpose of this team?

A: To conduct a buy bust operation, sir.

Q: When this team was formed, what happened next?

A: We went to J.P. Laurel St., T.S. Cruz Subd., Brgy. San Agustin, Novaliches, Quezon City, sir.

Q: And what time did you go to that area, Mr. Witness?

A: Around 9:00 p.m., sir.

x x x x

Q: What happened when you arrived there, Mr. Witness?

A: When we were already at that place I alighted from the vehicle together with the informant, sir.

Q: What did you do thereafter?

A: We proceeded to the subject house to the place of alias "Jack", sir.

Q: What happened when you proceeded to the house of alias "Jack"?

A: I saw alias "Jack" in front of her door, sir.

x x x x

Q: What happened when you saw this accused in front of her door?

A: The confidential informant accompanied me and introduced me to alias "Jack", sir.

Q: What happened when you were introduced to alias "Jack"?

A: He told "Jack" that I need "panggamit" worth P200.00, sir.

Q: And what was her reply, if any?

A: Jack asked me if I need more, sir.

Q: What happened?

A: I told her that I only have P200.00 so I could only buy that worth, sir.

Q: So, what did she do, if any?

A: She gave me an equivalent of P200.00 on a plastic sachet, sir.

Q: What is that plastic sachet?

A: It contained white crystal "buo-buo" suspected to be shabu, sir.

Q: What did you do after these plastic sachets were handed to you?

A: I gave her the P200.00 and she accepted it, sir.

Q: What happened when she accepted this P200.00?

A: After she received the P200.00, I made the pre-arranged signal, sir.

Q: What was that pre-arranged signal?

A: Scratching my head, sir.

Q: What happened when you scratched your head?

A: I introduced myself as a policeman to alias "Jack", sir.

Q: What happened when you introduced yourself as policeman to alias "Jack"?

A: I got from her left hand another plastic sachet of suspected shabu and I arrested her, sir.

Q: How many plastic sachets were you able to recover from this accused?

A: Two (2) plastic sachets, sir.[34]

Without a doubt, all the elements of the crime of illegal sale of prohibited drugs were duly proved in the instant case. The testimony clearly shows that a sale occurred between accused-appellant, as the seller, and PO2 Collado, as the buyer, for PhP 200 worth of shabu. In addition, the said testimony illustrated the seizing of the prohibited drug, and the exchange of the marked money. As a matter of fact, the trial court, in disposing of the case, said:

x x x The Court sees in the case at bar the elements above-mentioned. PO2 Michael Collado, the poseur buyer, identified accused herein as the seller and particularly described the transaction entered into by and between him and her specifically the exchange of the buy bust money and the plastic sachet subject thereof. In fine, accused was identified as the offender, and the dangerous drugs sold by her [were] presented by the Court. Indubitable, therefore, is the presence of the elements of the offense enumerated by jurisprudence.[35]

Likewise, the prosecution has established all the elements of the crime of illegal possession of dangerous drugs in the same testimony of PO2 Collado. The elements are: (1) that the accused is in possession of the object identified as a prohibited or regulatory drug; (2) that such possession is not authorized by law; and (3) that the accused freely and consciously possessed the said drug.[36]

According to the testimony of PO2 Collado, accused-appellant was caught in actual possession of the prohibited drug without showing any proof that she was duly authorized by law to possess it. Having been caught in flagrante delicto, there is prima facie evidence of animus possidendi on accused-appellant's part. As held by this Court in *U.S. v. Bandoc*, the finding of a dangerous drug in the house or within the premises of the house of the accused is prima facie evidence of knowledge or animus possidendi and is enough to convict in the absence of a satisfactory explanation.[37] In the case at bar, accused-appellant failed to present any evidence to rebut her animus possidendi of the shabu taken from her left hand during the buy-bust operation.

WHEREFORE, the appeal is DENIED. The CA Decision in CA-G.R. CR-H.C. No. 03400 finding accused-appellant Jacqueline Pambid y Cortez guilty of the crimes charged is AFFIRMED IN TOTO.

SO ORDERED.

Corona, C.J., (Chairperson), Leonardo-De Castro, Del Castillo, and Perez, JJ., concur.

[1] Rollo, pp. 2-17. Penned by Associate Justice Portia Aliño-Hormachuelos and concurred in by Associate Justices Fernanda Lampas Peralta and Ramon R. Garcia.

[2] CA rollo, pp. 12-19. Penned by Presiding Judge Severino B. De Castro, Jr.

[3] Records, p. 2.

- [4] Id. at 6.
- [5] Id. at 46.
- [6] Id. at 52.
- [7] Id. at 66.
- [8] Id. at 74.
- [9] Id. at 95.
- [10] TSN, June 22, 2005, pp. 5-6.
- [11] Id. at 6-9.
- [12] Id. at 9-10.
- [13] Records, p. 189.
- [14] Id. at 17.
- [15] TSN, January 16, 2007, p. 4.
- [16] Id. at 5-7.
- [17] Id. at 10-11.
- [18] Id. at 9.
- [19] TSN, September 4, 2007, pp. 3-4.
- [20] TSN, November 19, 2007, p. 4.
- [21] Id. at 4-5.
- [22] Id. at 6.
- [23] CA rollo, pp. 18-19.
- [24] Rollo, p. 17.
- [25] People v. De Mesa, G.R. No. 188570, July 6, 2010; People v. Mariacos, G.R. No. 188611, June 16, 2010.
- [26] People v. Del Monte, G.R. No. 179940, April 23, 2008, 552 SCRA 627, 636.
- [27] Records, p. 189.
- [28] Id. at 191.
- [29] Id. at 190.
- [30] Garcia v. CA, G.R. No. 110983, March 8, 1996, 254 SCRA 542, 551.
- [31] RCBC v. Buenaventura, G.R. No. 176479, October 6, 2010.
- [32] G.R. No. 186540, April 14, 2010.
- [33] People v. Gonzales, G.R. No. 143805, April 11, 2002, 380 SCRA 689, 697; People v. Bongalon, G.R. No. 125025, January 23, 2002, 374 SCRA 289, 307; People v. Lacap, G.R. No. 139114, October 23, 2001, 368 SCRA

124, 143; *People v. Tan*, G.R. No. 133001, December, 14, 2000, 348 SCRA 116, 123; *People v. Zheng Bai Hui*, G.R. No. 127580, August 22, 2000, 338 SCRA 420, 474.

[34] TSN, June 22, 2005, pp. 5-9.

[35] CA rollo, p. 17.

[36] *People v. Del Norte*, G.R. No. 149462, March 29, 2004, 426 SCRA 383, 388.

[37] 23 Phil. 14, 15 (1912).

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.