

PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. PO3 JULIETO BORJA, ACCUSED-APPELLANT.

G.R. No. 199710. August 02, 2017

Ponente: LEONEN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-199710/>

LEONEN, J.:

Extortion done by police themselves amounting to kidnapping with ransom undermines the government efforts to establish the rule of law in general and the proper prosecution against drug traffickers in particular. Even the subsequent prosecution of the victim of extortion does not negate the criminal liability of the accused for the crime the latter committed against the former.

This resolves the appeal to the March 14, 2011 Decision[1] of the Court of Appeals in CA-G.R. CR.-H.C. No. 03998, finding PO3 Julieta Borja (PO3 Borja) guilty beyond reasonable doubt of kidnapping for ransom.

In the Information dated May 28, 2004, Borja was charged of kidnapping punished under Article 267[2] of the Revised Penal Code. The accusatory portion of the information read:

That on or about May 26, 2004, at or about 10:10 in the morning, at the vicinity of Brgy. Central, Diliman, Quezon City and within the jurisdiction of this Honorable Court, the above-named accused, with an unknown companion, conspiring and confederating with one another, mutually aiding and assisting one another, by the use of force, violence and intimidation and without authority of law, did then and there, willfully, unlawfully and feloniously kidnap and illegally detain victim/hostage RONALYN G. MANATAD, and thereafter demanded and received the ransom money in the amount of P100,000.00 from Edwin G. Silvio, the victim's brother, for the release of said RONALYN G. MANATAD on same date.[3]

PO3 Borja entered a plea of not guilty during arraignment. Trial on the merits ensued.[4]

Based on the collective testimonies of its witnesses, the prosecution alleged that at about 10:00 a.m. on May 26, 2004, Ronalyn Manatad (Ronalyn) and her friend, Vicky Lusterio (Lusterio), were walking along Agham Road, Diliman, Quezon City.[5] Suddenly, a man who was later identified as PO3 Borja, grabbed Ronalyn by her right forearm and forcibly took her inside a gray van where three (3) other men were waiting.[6] Both Ronalyn and Lusterio shouted for help but no one came to their rescue. Lusterio managed to escape. She immediately reported the incident to Ronalyn's mother, Adelina Manatad (Adelina).[7]

Meanwhile, PO3 Borja and his companions drove the van around Quezon City.[8] One (1) of Ronalyn's abductors, a certain Major Clarito,[9] asked for her relatives' contact numbers.[10] Ronalyn gave the number of her brother, Edwin G. Silvio (Edwin).[11]

Adelina received a phone call from one (1) of the kidnappers, who demanded P200,000.00 in exchange for Ronalyn's liberty. Adelina informed him that their family could not afford to pay the ransom due to their financial condition. Suddenly, the caller hung up. Edwin thereafter arrived and negotiated for a reduced ransom when one (1) of the kidnappers called again. The kidnappers acceded and lowered their demand to P100,000.00.[12]

At this juncture, Ronalyn was transferred from the van to a car.[13]

Edwin sought assistance from Sergeant Abet Cordova (Sgt. Cordova) of the National Anti-Kidnapping Task Force (NAKTAF). Sgt. Cordova instructed Edwin to negotiate with his sister's abductors and to notify him of any developments. Sgt. Cordova then reported the incident to NAKTAF group commander, Major Saiiti Cababasay, who immediately mobilized his team for an entrapment operation.[14]

At around 12:00 noon, Edwin received a call from Ronalyn's abductors. They instructed him to place the money in an SM plastic bag and to proceed to the Wildlife Park along Quezon Avenue at 3:00 p.m. Edwin informed Sgt. Cordova about the payoff. The police operatives proceeded to the Wildlife Park and positioned themselves within the area.[15]

Edwin went to the Wildlife Park at 3:00 p.m. as planned. Shortly after, PO3 Borja approached Edwin and took the SM plastic bag containing the ransom money. Upon seeing the exchange, the police operatives arrested PO3 Borja and recovered the following items from him: (1) a 0.9 mm pistol, (2) a cellphone, (3) a wallet, and (4) the P100,000.00 ransom amount. PO3 Borja was then brought to the NAKTAF headquarters for investigation.[16]

Despite the successful entrapment operation, the authorities failed to rescue Ronalyn. While she was inside the van, Ronalyn heard one (1) of her abductors say that PO3 Borja was entrapped.[17] The others cursed her and said, "Putang ina, iyung kapatid mo. Tumawag ng taga-NAKTAF." [18] Afterwards, she was taken by her captors to the Philippine Drug Enforcement Agency where she was charged with illegal sale of shabu.[19]

For his defense, PO3 Borja testified that on the day of the alleged incident, he was with PO2 Ding Tan at Branch 79, Regional Trial Court, Quezon City to testify as a witness in a criminal [20] case.[21] However, the hearing was postponed.[22] After securing a certificate of appearance, PO3 Borja decided to go home at 12:00 noon.[23]

At around 2:00 p.m., PO3 Borja received a phone call from an unknown person. The caller sought assistance to recover his sister who had been arrested. He instructed the caller to call back. On the second call, the caller told him to go to the Wildlife Park and meet a certain Edwin, who would be wearing a white T-shirt and a bull cap.[24]

PO3 Borja proceeded to the Wildlife Park and met Edwin, who told him that Ronalyn and Lusterio had been arrested earlier in a buy-bust operation. PO3 Borja advised Edwin to go with him to the police station and report the incident. However, Edwin said that he had to wait for his cousin to arrive.[25]

Half an hour later, Captain Frederick Obar (Capt. Obar), SPO3 Eric Orellaneda (SPO3 Orellaneda), and three (3) unidentified persons approached PO3 Borja. SPO3 Orellaneda shouted, "Meron lang ditong nag-eextortion" C to which PO3 Borja replied, "Wala naman akong alam" SPO3 Orellaneda confiscated PO3 Borja's wallet, cellphone, and firearm. Afterwards, Sgt. Cordova shouted, "O, meron ditong P100,000.00 galing kay Borja." [26] PO3 Borja was then arrested and was charged of kidnapping for ransom.[27]

In the Decision [28] dated October 20, 2008, the Regional Trial Court found PO3 Borja guilty beyond reasonable doubt of kidnapping for ransom.[29] Accordingly, he was sentenced to the penalty of reclusion perpetua.[30]

WHEREFORE, finding the accused PO3 Julieta Borja GUILTY beyond reasonable doubt of the crime of kidnapping for ransom, defined and penalized under Article 267 of the Revised Penal Code, as amended by Republic Act [No.] 7659, the Court hereby sentences him to suffer the penalty of reclusion perpetua. With costs against the accused.

SO ORDERED.[31]

PO3 Borja appealed the decision of the Regional Trial Court.[32] He argued that Ronalyn was not deprived of her

liberty because she was lawfully arrested and charged with violation of Republic Act No. 9165.[33]

In the Decision[34] dated March 14, 2011, the Court of Appeals affirmed with modification the Decision dated October 20, 2008 of the Regional Trial Court. PO3 Borja was ordered to pay the victim P50,000.00 as civil indemnity and P50,000.00 as moral damages.[35]

On August 18, 2011, PO3 Borja filed his Notice of Appeal,[36] which was given due course by the Court of Appeals in the Resolution[37] dated September 14, 2011.

On February 6, 2012, this Court noted the records forwarded by the Court of Appeals and required the Director of the Bureau of Corrections to confirm accused-appellant PO3 Borja's confinement.[38] In the Resolution[39] dated March 6, 2013, the parties were then required to file their respective supplemental briefs, should they so desired.

Accused-appellant filed his Supplemental Brief[40] on July 18, 2013. On the other hand, the People of the Philippines, through the Office of the Solicitor General, manifested that it would no longer file a supplemental brief.[41]

Accused-appellant anchors his arguments on the arrest and subsequent conviction of Ronalyn for the sale of shabu. He argues that it is absurd to convict him of kidnapping considering that the alleged victim was caught in flagrante delicto during a buy-bust operation on the day of the alleged incident.[42] Furthermore, Ronalyn was found guilty of violation of Republic Act No. 9165 by both the Court of Appeals[43] and this Court.[44] She is now serving her sentence in the Women's Correctional in Mandaluyong.[45]

On the other hand, the Office of the Solicitor General asserts that the categorical and spontaneous testimonies of the prosecution's witnesses are sufficient to convict accused-appellant of kidnapping.[46] The Office of the Solicitor General argues that accused-appellant's defense of alibi does not deserve weight. It was not physically impossible for him to be at the place where the crime was committed since Quezon City Hall of Justice was just a few blocks away from where the victim was taken.[47]

The sole issue for this Court's resolution is whether accused-appellant PO3 Julieta Borja is guilty beyond reasonable doubt of kidnapping punished under Article 267 of the Revised Penal Code.

This Court affirms the conviction of accused-appellant. His arguments are unmeritorious.

Ronalyn's apprehension for violation of Republic Act No. 9165 does not automatically negate the criminal liability of accused-appellant. It also does not exclude the possibility of the commission of the crime with which accused-appellant is charged. The buy-bust operation carried out against Ronalyn and her kidnapping are events that can reasonably coexist.

Furthermore, a violation of Republic Act No. 9165 bears no direct or indirect relation to the crime of kidnapping. Ronalyn's arrest and conviction are immaterial to the determination of accused-appellant's criminal liability. In other words, Ronalyn's innocence or guilt would neither affirm nor negate the commission of the crime of kidnapping against her. Therefore, the resolution of this case will depend solely on whether the prosecution has established all the elements of kidnapping under Article 267 of the Revised Penal Code.

The quantum of evidence required in criminal cases is proof beyond reasonable doubt.[48] This does not entail absolute certainty on the accused's guilt. It only requires moral certainty or "that degree of proof which produces conviction in an unprejudiced mind." [49] The mind and consciousness of a magistrate must be able to rest at ease upon a guilty verdict.[50]

A conviction for the crime of kidnapping or serious illegal detention requires the concurrence of the following elements:

- The offender is a private individual[;]
- That individual kidnaps or detains another or in any other manner deprives the latter of liberty[;]
- The act of detention or kidnapping is illegal[;]
- In the commission of the offense, any of the following circumstances is present:
- The kidnapping or detention lasts for more than three days.
- It is committed by one who simulates public authority.
- Any serious physical injury is inflicted upon the person kidnapped or detained, or any threat to kill that person is made.
- The person kidnapped or detained is a minor, a female or a public officer.[51] (Citation omitted)

Although the crime of kidnapping can only be committed by a private individual,[52] the fact that the accused is a public official does not automatically preclude the filing of an information for kidnapping against him.

A public officer who detains a person for the purpose of extorting ransom cannot be said to be acting in an official capacity. In *People v. Santiano*,[53] this Court explained that public officials may be prosecuted under Article 267 of the Revised Penal Code if they act in their private capacity:

The fact alone that appellant Pillueta is "an organic member of the NARCOM" and appellant Sandigan [is] "a regular member of the PNP" would not exempt them from the criminal liability for kidnapping. It is quite clear that in abducting and taking away the victim, appellants did so neither in furtherance of official function nor in the pursuit of authority vested in them. It is not, in fine, in relation to their office, but in purely private capacity, that they have acted in concert with their co-appellants Santiano and Chanco.[54] (Citation omitted)

The burden is on the accused to prove that he or she acted in furtherance of his or her official functions. In *People v. Trestiza*,[55] this Court noted:

Before the present case was tried by the trial court, there was a significant amount of time spent in determining whether kidnapping for ransom was the proper crime charged against the accused, especially since Trestiza and Manrique were both police officers. Article 267 of the Revised Penal Code specifically stated that the crime should be committed by a private individual. The trial court settled the matter by citing our ruling in *People v. Santiano*[.]

....

In the same order, the trial court asked for further evidence which support the defense's claim of holding a legitimate police operation. However, the trial court found as unreliable the Pre-Operation/Coordination Sheet presented by the defense. The sheet was not authenticated, and the signatories were not presented to attest to its existence and authenticity.[56] (Citations omitted)

Accused-appellant's membership in the Philippine National Police does not automatically preclude the filing of an information for kidnapping or serious illegal detention against him. He may be prosecuted under Article 267 of the Revised Penal Code if it is shown that he committed acts unrelated to the functions of his office.

The essence of the crime of kidnapping is "the actual deprivation of the victim's liberty coupled with the intent of the accused to effect it." [57] The deprivation of a person's liberty can be committed in different ways.[58] It is not always necessary that the victim be imprisoned,[59] The second element of the crime of kidnapping[60] is met as long as there is a showing that the victim's liberty of movement is restricted.[61]

In this case, Ronalyn was clearly deprived of her liberty. She was forcibly taken inside a vehicle by accused-appellant and his cohorts and was driven around Quezon City for at least five (5) hours.[62] The victim categorically testified on the manner and details of her detention,[63] thus:

While you were, as you said, about to go out of your house on that morning of May 26, 2004, do you remember any untoward incident that transpired?

Q:

While you were, as you said, about to go out of your house on that morning of May 26, 2004, do you remember any untoward incident that transpired?

A:

I was surprised when a male person suddenly grabbed me.

....

Q:

You said that a male person suddenly grabbed you, do you know that person?

A:

No, ma'am.

Q:

After that male person suddenly grabbed you, by the way, on what part of your body were you grabbed?

A:

The right forearm, ma'am.

Q:

After you were grabbed by your arm, what happened next?

A:

I shouted.

....

Q:

Where were you b[r]ought?

A:

I was loaded in a van.

Q:

Do you remember what the van looked like?

A:

Yes, ma'am.

Q:

Could you describe it to the court?

A:

It was big.

Q:

What color was it?

A:

Gray.

Q:

Did you happen to see the plate number of the van?

A:

No, ma'am.

Q:

You said that you were suddenly grabbed by your arm and you were loaded inside a gray van, what happened thereafter?

A:

They drove me to the Circle.

Q:

You said they, so, there must be more than one person?

A:

Yes, ma'am.

Q:

How many were they in that van, including the male person who suddenly grabbed you?

A:

About three, ma'am.

Q:

Including the person who took you to the van?

A:

He was the fourth.

....

Q:

After that conversation, what happened, if any?

A:

I was transferred to another vehicle.

Q:

And could you describe that car that you transferred to from that van?

A:

It was a car.

Q:

Do you know the color?

A:

Gray.

....

Q:

What happened after you were transferred to that gray car?

A:

We went to McDonald's at Quezon Avenue.

....

Q:

Where exactly were you taken after you were transferred to the gray car?

A:

At the back of Sulo Hotel and then McDonald's and then the back of SSS and then in front of East Avenue Medical Center.

Q:

Until what time were you in that car?

A:

3:00 o'clock in the afternoon, ma'am.[64]

The first two (2) and the last elements of the crime of kidnapping are present in this case, Ronalyn, a woman, was forcibly taken by accused-appellant and loaded in a van where she was detained for several hours. These acts are completely unrelated to accused-appellant's functions as a police officer, and as such, he may be prosecuted under Article 267 of the Revised Penal Code.

The third element of the crime of kidnapping is also present. Accused-appellant and his companions deprived the victim of her liberty to extort ransom from her family:

Q:

You said you heard them calling your brother, what did you hear from them in their conversation?

A:

They were asking for money.

Q:

By the way, who was that person who called your brother?

....

A:

Major Clarito, ma'am.

....

Q:

You said that you heard Major Clarito telling your brother to prepare money, is that correct?

A:

Yes, ma'am.

Q:

What else did you hear from him?

A:

They asked my brother to give P200,000.00 and then I would be released.

....

Q:

What else did you hear in that phone conversation?

....

A:

To prepare the P200,000.00 and to meet at Wildlife.[65]

All the elements of kidnapping were sufficiently proven by the prosecution, which cannot be overturned by accused-appellant's bare denial and alibi. These two (2) defenses are inherently weak considering that they can be easily contrived.[66]

For the defense of alibi to prosper, there must be a showing that it was physically impossible for the accused "to have been at the scene of the crime at the time of its commission." [67] In the present case, accused-appellant failed to overcome this standard. Even if he attended the hearing in Quezon City Hall of Justice, there is no showing that it was physically impossible for him to be at Agham Road when the victim was forcibly taken. This Court takes judicial notice that Agham Road and the Quezon City Hall of Justice are just a few blocks away from each other. Accused-appellant could have easily slipped out of the city hall at any time.

Moreover, if this Court were to believe accused-appellant's version of the incident, it was highly irregular for a police officer to meet the victim's relative in a place other than the police station to discuss the incident reported to him. That he had to wait for 30 minutes for another person to arrive is also suspect. Moreover, as pointed out

by the Office of the Solicitor General,[68] it is unusual for accused-appellant to interfere with an ongoing operation to which he was not assigned. All these irregularities point to the reasonable conclusion that accused-appellant's purpose in proceeding to the Wildlife Park was to extort money from the victim's family.

Although the penalty for kidnapping for ransom is death under Article 267 of the Revised Penal Code, Republic Act No. 9346[69] proscribed its imposition. In this regard, both the Regional Trial Court and the Court of Appeals correctly imposed the penalty of reclusion perpetua.

However, in line with current jurisprudence, the civil indemnity of P50,000.00 and moral damages of P50,000.00 imposed by the Court of Appeals should be increased to P100,000.00 each. Exemplary damages of P100,000.00 should also be imposed.[70]

WHEREFORE, the Decision dated March 14, 2011 of the Court of Appeals in CA-G.R. CR.-H.C. No. 03998 is AFFIRMED with MODIFICATION. Accused-appellant PO3 Julieto Borja is found guilty beyond reasonable doubt of kidnapping for ransom and is sentenced to suffer the penalty of reclusion perpetua without eligibility for parole.

Moreover, he is ordered to pay P100,000.00 as civil indemnity, P100,000.00 as moral damages, and P100,000.00 as exemplary damages. All monetary awards shall earn interest at the rate of six percent (6%) per annum from the date of the finality of this judgment until fully paid.[71]

SO ORDERED.

Carpio, (Chairperson), Bersamin,[*] Mendoza, and Martires, JJ., concur.

[*] Designated as additional member per raffle dated February 16, 2013.

[1] Rollo, pp. 2-23. The Decision was penned by Associate Justice Priscilla J. Baltazar-Padilla and concurred in by Associate Justices Fernanda Latnpas Peralta and Jane Aurora C. Lantion of the Special Fourteenth Division, Court of Appeals, Manila.

[2] REV. PENAL CODE, art. 267 provides:

Article 267. Kidnapping and serious illegal detention. — Any private individual who shall kidnap or detain another, or in any other manner deprive him of his liberty, shall suffer the penalty of reclusion perpetua to death:

1. If the kidnapping or detention shall have lasted more than three days.
2. If it shall have been committed simulating public authority.
3. If any serious physical injuries shall have been inflicted upon the person kidnapped or detained, or if threats to kill him shall have been made.
4. If the person kidnapped or detained shall be a minor, except when the accused is any of the parents, female, or a public officer.

The penalty shall be death where the kidnapping or detention was committed for the purpose of extorting ransom from the victim or any other person, even if none of the circumstances above-mentioned were present in the commission of the offense.

When the victim is killed or dies as a consequence of the detention or is raped, or is subjected to torture or dehumanizing acts, the maximum penalty shall be imposed.

[3] Rollo, p. 3.

[4] Id.

[5] Id. at 3-4.

[6] Id. at 4.

[7] Id.

[8] Id.

[9] CA rollo, p. 26.

[10] Rollo, p. 4.

[11] Id.

[12] Id.

[13] Id. at 5.

[14] Id.

[15] Id. at 5.

[16] Id. at 6.

[17] CA rollo, p. 26.

[18] Id.

[19] Rollo, p. 6.

[20] Id. at 6-7.

[21] CA rollo, p. 28.

[22] Rollo, p. 7.

[23] Id.

[24] Id.

[25] Id.

[26] CA rollo, p. 28.

[27] Rollo, p. 7.

[28] CA rollo, pp. 25-31. The Decision, docketed as Crim. Case No. Q-04-127167, was penned by Presiding Judge Alexander S. Balut of Branch 76, Regional Trial Court, Quezon City.

[29] Id. at 31.

[30] Id.

[31] Id.

[32] Id. at 32-34, Accused-Appellant's Notice of Appeal.

[33] Id. at 60, Manifestation.

[34] Rollo, pp. 2-23.

[35] Id. at 22.

[36] Id. at 24-26.

[37] Id. at 27.

[38] Id. at 29-30.

[39] Id. at 50.

[40] Id. at 66-75.

[41] Id. at 57-58.

[42] Id. at 67.

[43] Id. at 69. The Decision dated December 15, 2010 in CA-G.R. CR-HC No. 03140 was penned by then Associate Justice Noel G. Tijam and concurred in by Associate Justices Marlene Gonzales-Sison and Danton Q. Bueser of the Eleventh Division of the Court of Appeals, Manila. In her appeal, Ronalyn Manatad raised the defense that she was kidnapped. However, according to the Court of Appeals, there was enough evidence on record that a buy-bust operation was conducted against her. The Court of Appeals relied on the testimonies of the prosecution's witnesses, the pre-operation coordination sheet, and entries in the police log book.

[44] Rollo, p. 69, Supplemental Brief. In the Resolution dated February 1, 2012 this Court dismissed Ronalyn Manatad's appeal of the Decision of the Court of Appeals dated December 15, 2010.

[45] Id.

[46] CA rollo, pp. 150-151.

[47] Id. at 152.

[48] RULES OF COURT, Rule 133, sec. 2 provides:

Section 2. Proof beyond reasonable doubt. - In a criminal case, the accused is entitled to an acquittal, unless his guilt is shown beyond reasonable doubt. Proof beyond reasonable doubt does not mean such a degree of proof as, excluding the possibility of error, produces absolute certainty. Moral certainty only is required, or that degree of proof which produces conviction in an unprejudiced mind.

[49] RULES OF COURT, Rule 133, sec. 2.

[50] *People v. Lumibao*, 465 Phil. 771, 781 (2004) [Per J. Quisumbing, Second Division].

[51] *People v. Obeso*, 460 Phil. 625, 633 (2003) [Per J. Panganiban, Third Division].

[52] REV. PENAL CODE, art. 267.

[53] 359 Phil. 928 (1998) [Per J. Vitug, First Division].

[54] Id. at 943.

[55] 676 Phil. 420 (2011) [Per J. Carpio, Second Division].

[56] Id. at 457-458.

[57] *People v. Mamantak*, 582 Phil. 294, 303 (2008) [Per J. Corona, En Banc].

[58] *Id.*

[59] *People v. Obeso*, 460 Phil. 625, 634 (2003) [Per J. Panganiban, Third Division].

[60] *Id.* at 633.

[61] *People v. Jacalne*, 61A Phil. 139, 147 (2011) [Per J. Peralta, Third Division].

[62] *Rollo*, p. 18.

[63] *Id.* at 3-6.

[64] *Id.* at 12-14.

[65] *Id.* at 13.

[66] *People v. Panlilio*, 325 Phil. 848, 857 (1996) [Per J. Bellosillo, First Division]; *People v. Enriquez, Jr.*, 503 Phil. 367, 376 (2005) [Per J. Puno, Second Division].

[67] *People v. Enriquez, Jr.*, 503 Phil. 367, 376 (2005) [Per J. Puno, Second Division].

[68] *CA rollo*, p. 153.

[69] *An Act Prohibiting the imposition of Death Penalty in the Philippines* (2006).

[70] *People v. Gregorio*, G.R. No. 194235, June 8, 2016, 792 SCRA 469, 504 [Per J. Leonardo-De Castro, First Division]; *People v. Gambao*, 718 Phil. 507, 531-532 (2013) [Per J. Perez, En Banc].

[71] See *Nacar v. Gallery Frames, et al.*, 716 Phil. 267, 281-283 (2013) [Per J. Peralta, En Banc].

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.