

RENATO GUEVARRA Y ROBLES, PETITIONER, VS. HONORABLE COURT OF APPEALS AND PEOPLE OF THE PHILIPPINES, RESPONDENTS.

G.R. No. 276682, February 10, 2025

Ponente: KHO, JR., J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-276682/>

KHO, JR., J.:

Before the Court is a Petition for Certiorari[1] with an application for the issuance of a Temporary Restraining Order (TRO) and/or a Writ of Preliminary Injunction[2] assailing the Decision[3] dated January 18, 2024 and the Resolution[4] dated March 25, 2024 of the Court of Appeals (CA) in CA--G.R. CR No. 02428-MIN, which affirmed the Decision[5] dated January 20, 2023 of Branch 33, Regional Trial Court, Butuan City (RTC). The RTC convicted petitioner Renato Guevarra y Robles (Guevarra) of violation of Section 34 of Commission on Elections (COMELEC) Resolution No. 10049,[6] in relation to Section 13 of Republic Act No. 9006[7] and Section 264 of Batas Pambansa Blg. 881.[8]

The Facts

Guevarra was a candidate for councilor of Butuan City during the May 9, 2016 National and Local Elections. In an Information[9] dated January 7, 2019, he was charged with violating Section 34 of COMELEC Resolution No. 10049:

That on or about April 12, 2016 and April 23, 2016, between 4:30 to 5:00 o'clock in the afternoon in Butuan City, Philippines and within the jurisdiction of this Honorable Court, during the campaign period for the May 9, 2016 Local and National Elections, the above-named accused, being then a candidate for City Councilor of Butuan City under Action (sic) Demokratiko Party, taking advantage of his profession as a radio commentator, did then and there willfully, unlawfully, and feloniously, engaged (sic) in partisan political activity by uttering and broadcasting on the air during his radio program: "Batang Butuan: Oras Na! Raon na" with the Radyo Trumpeta FM radio station, thereby attacking the candidacy of incumbent Congressman Laurence Lemuel "Law" A. Fortun of the Congressional District of Butuan City and the Municipality of Las Nieves and then candidate for re-election for the same office, whom he named, among others, as "Lawig Traydor", ignorant, liar, power and wealth hungry, corrupt, drug user and a traitor, to the damage and prejudice of said Congressman Laurence Lemuel "Law" A. Fortun, herein represented by Eldie N. David in such amount as may be proved by the court.

CONTRARY TO LAW: (Violation of Section 34 of COMELEC Resolution No. 10049 in relation to Section 264 of the Omnibus Election Code).[10]

Upon arraignment, Guevarra pleaded not guilty.[11]

The prosecution's evidence sought to establish that at the time of the broadcast, Guevarra was a radio commentator for the program Batang Butuan: Oras Na! Raon Na aired in the station Radyo Trumpeta. On April 12 and 23, 2016, three witnesses, who were working for the campaign of another candidate, recorded the radio program, where Guevarra was heard promoting his own candidacy and that of his party-mates. He also maligned

other candidates, such as Laurence Lemuel A. Fortun.[12]

For his part, Guevarra denied the charge. He argued that as early as 2012, he had resigned from his position as a radio commentator in Radyo Trumpeta. He presented a copy of the resignation letter he sent to Radyo Trumpeta's acting manager, Elmer Maboloc (Maboloc). He claimed that he went on to teach at an educational institution after his resignation. He averred that his appearance in the radio program on April 12 and 23, 2016 was only as a guest and not a commentator.[13]

In support of Guevarra's claim, Maboloc testified as to the former's resignation as commentator. Amihan J. Bayer (Bayer), another radio commentator and Guevarra's former colleague, also testified that she interviewed Guevarra in April 2016. She clarified that Guevarra was only a guest in the radio program and is not considered a commentator or a block-timer.[14]

The prosecution then presented a rebuttal witness who testified that contrary to Bayer's testimony, Guevarra was not merely a guest, but was the program's anchorman, who did the interviewing of the guests. She also identified Guevarra as among the block-timers who were consistently against Mayor Ronnie Lagnada.[15]

The RTC Ruling

In a Decision[16] dated January 20, 2023, the RTC found Guevarra guilty beyond reasonable doubt of violation of Section 34 of COMELEC Resolution No. 10049, in relation to Section 13 of Republic Act No. 9006 and Section 264 of Batas Pambansa Blg. 881. Accordingly, Guevarra was sentenced to suffer the straight penalty of imprisonment for a period of one year.[17]

In finding guilt, the RTC listened to the broadcast recordings and concluded that far from being a guest in the radio program, Guevarra was its anchorman and commentator. He was the one who directed the flow of the program; introduced the guests of the program, consisting of his fellow candidates; and even introduced a certain Vic dela Victoria as his "co-anchor." Further, the RTC noted that Guevarra was alone for most of the program, belying the defense that he was a mere guest. To the RTC, this meant that Guevarra was a radio commentator. Thus, following Section 34 of COMELEC Resolution No. 10049, he should have been deemed resigned or taken a leave of absence from the practice of his profession.[18]

Given Guevarra's involvement in the radio program, the RTC gave little credence to his defense of resignation, ruling that even if it were true, media practitioners who are not employed by any media entity, such as talents or block-timers, are still prohibited by Section 34 from using their time to favor any candidate or party.[19]

Aggrieved, Guevarra appealed[20] to the CA.

The CA Ruling

In a Decision[21] dated January 18, 2024, the CA affirmed the RTC's decision in toto.[22]

The CA rejected Guevarra's argument that the prosecution failed to prove the actual date of broadcast, affirming the RTC's finding that the broadcast mentioned the date of the broadcast and that Guevarra even thanked people who greeted him on his birthday, April 23. Further, the CA also found that Guevarra steered the radio program on his own and was not a mere guest. Following Section 34 of COMELEC Resolution No. 10049, he was a media practitioner who used his airtime to favor certain candidates and political parties.[23]

Guevarra moved for reconsideration,[24] which the CA denied in a Resolution[25] dated March 25, 2024.

According to Guevarra, on March 5, 2024, he sent a Letter[26] to Atty. Joy Marie Badal-Pamisa, Executive Clerk of Court III of the Twenty-Third Division of the CA, to inform her that he has severed his attorney-client relations

with his then-counsel, Atty. Cyril Francis S. Casiño (Atty. Casiño). He also requested that subsequent decisions, resolutions, and orders be sent to his address in Butuan City. In its March 25, 2024 Resolution, the CA noted Guevarra's Letter,[27] even listing his new address in Butuan City; nevertheless, the same Resolution was sent to Guevarra's old address in Cavite.[28] When the CA's Resolution reached Guevarra in Butuan City, the time to file a petition for review on certiorari with the Court had passed. Consequently, the CA judgment had been entered on August 16, 2024.[29]

This prompted Guevarra to file the present Petition for Certiorari, claiming that the CA gravely abused its discretion in failing to send its Resolution to his proper address. Further, he claims that the courts a quo erred in finding him guilty of violating Section 34 of COMELEC Resolution No. 10049. He claims that the courts should have considered his evidence of having resigned as a commentator as sufficient. Finally, he claims that his actions during the campaign period did not violate Section 34 of COMELEC Resolution No. 10049.[30]

The Issue Before the Court

The Court resolves whether the CA gravely abused its discretion in affirming Guevarra's conviction and issuing an Entry of Judgment despite not sending its Resolution to Guevarra's proper address.

The Court's Ruling

The Petition is denied.

Once the time to file an appeal has lapsed with no appeal or other suitable remedy being taken, the rule respecting the immutability of final judgments takes effect. It ordains that a decision that has acquired finality may no longer be modified in any respect.[31] Nevertheless, the Court has recognized exceptions to the rule. In *Bernardo vs. Court of Appeals*,[32] the Court held:

It is only in rare cases that this Court resolves to recall an entry of judgment such as for instance, to prevent a miscarriage of justice. We relax the rules of procedure in order to serve substantial justice considering (a) matters of life, liberty, honor or property, (b) the existence of special or compelling circumstances, (c) the merits of the case, (d) a cause not entirely attributable to the fault or negligence of the party favored by the suspension of the rules, (e) a lack of any showing that the review sought is merely frivolous and dilatory, and (f) the other party will not be unjustly prejudiced thereby. . . .[33]

Here, the Court recognizes that through a Letter he submitted to the CA, Guevarra had claimed that he had severed ties with his counsel, Atty. Casiño, and that he had changed his address. In its March 25, 2024 Resolution, the CA acknowledged Guevarra's Letter containing his new address.[34] Nevertheless, the Resolution was sent to Guevarra's old address and to Atty. Casiño. While the Court finds that the CA had been remiss in failing to acknowledge Guevarra's new address, it had not erred in sending its Resolution to Atty. Casiño. Despite Guevarra's Letter, Atty. Casiño remained his counsel of record. True, the termination of an attorney-client relation is the client's absolute right; however, the duty of informing the court of such termination falls to the counsel and not the client.[35] The appropriate measures for the proper withdrawal of counsel are among the duties of counsel and not the client.

Thus, notwithstanding whatever had been agreed upon by Guevarra and Atty. Casiño, without a proper notice from counsel, the Court cannot fault the CA for considering the latter as Guevarra's counsel. Service of the CA Resolution to Atty. Casiño, therefore, is notice to Guevarra himself. It was, then, incumbent on Atty. Casiño, upon receipt of the CA Resolution, to immediately inform Guevarra of the CA's issuance for the latter to confer with his new counsel.

There being proper service of the Resolution, the lapse of the period to file the proper pleading to assail the CA's decision has resulted in its finality.

More importantly, even if the Court were to relax the rule on finality of judgments in this case, the Court finds no reversible error in the assailed CA Decision and Resolution that found Guevarra guilty of violating Section 34 of COMELEC Resolution No. 10049. This section implements Section 6.6 of Republic Act No. 9006, which states:

6.6. Any mass media columnist, commentator, announcer, reporter, on-air correspondent or personality who is a candidate for any elective public office or is a campaign volunteer for or employed or retained in any capacity by any candidate or political party shall be deemed resigned, if so required by their employer, or shall take a leave of absence from his/her work as such during the campaign period: Provided, That any media practitioner who is an official of a political party or a member of the campaign staff of a candidate or political party shall not use his/her time or space to favor any candidate or political party.

Section 34 of COMELEC Resolution No. 10049, on the other hand, provides:

SECTION 34. Mass Media Columnist, Announcer or Personality Running for Public Office or is a Campaign Volunteer. – Any mass media columnist, commentator, announcer, or reporter, who is a candidate for any elective public office, a party-list nominee, or is a campaign volunteer for or employed or retained in any capacity by any candidate or party shall be deemed resigned, if so required by their employer, or shall take a leave of absence from [their] work as such during the campaign period; Provided, that after [they have] filed [their] certificate of candidacy but before the campaign period, it shall be [their] obligation not to use [their] media work for premature election campaign or partisan political activity; Provided, finally, that any media practitioner who, while not [themselves] a candidate, is an official of a political party or a member of the campaign staff of a candidate or party shall not use [their] time or space to favor any candidate or party.

A close reading of these provisions shows that they contemplate two classes of offenders committing several unlawful acts.

The first is a mass media columnist, commentator, announcer, or reporter who is (1) a candidate for any elective public office, (2) a party-list nominee, or (3) a campaign volunteer for or employed in any capacity by any candidate or party. This sort of offender shall be deemed resigned if required by their employer or shall take a leave of absence from their work during the campaign period. These provisions make it unlawful for this kind of offender to fail to take a leave of absence or be deemed resigned from his profession during the campaign period. Put another way, these provisions prohibit the candidate from practicing their media-related profession during the campaign period.

The second kind of offender is a media practitioner who is an official of a political party or a member of the campaign staff of a candidate or political party. This sort of offender, while not deemed resigned or ordered to take a leave of absence, is nevertheless ordered by law not to use their time or space to favor any candidate or political party.

Both the RTC and CA found that the offense was committed on two dates, April 12 and April 23, 2016, which were within the campaign period for the 2016 National and Local Elections.[36] Despite Guevarra's claim of being resigned, both courts found, after listening to the recordings of the radio program, that Guevarra was the program's actual host. Instead of being interviewed, he was the one doing the interviewing. His active role in the radio program included directing its flow and introducing its guests. Thus, the courts a quo found that far from having resigned or taken a leave of absence, Guevarra was actively practicing his profession. To the courts, Guevarra's claim of merely guesting on the show remained a weak denial in the face of the actual recordings.[37] This Court finds no reason to overturn this legal conclusion. In criminal cases, the Court respects the factual findings of the trial court. When these findings are affirmed on appeal, they are accorded even greater respect, if not conclusive effect. The Court recognizes that the trial court had the unique opportunity to calibrate the evidence as they were presented and to observe the demeanor of witnesses as they testified.[38]

ACCORDINGLY, the Petition is DISMISSED. The Decision dated January 18, 2024 and the Resolution dated March 25, 2024 of the Court of Appeals in CA-G.R. CR No. 02428-MIN affirming the Decision dated January 20, 2023 of Branch 33, Regional Trial Court, Butuan City are hereby AFFIRMED.

In light of the dismissal of the main petition, the application for issuance of Temporary Restraining Order and/or Writ of Preliminary Injunction is DENIED for lack of merit.

SO ORDERED.

Lazaro-Javier and J. Lopez, JJ., concur.

Leonen,[*] SAJ. (Chairperson), see concurring opinion.

M. Lopez,[*] J., on official business.

[*] Designated Acting Chief Justice per Special Order No. 3160 dated February 6, 2025.

[**] On official business

[1] Rollo, pp. 4-34.

[2] Id. at 93-104.

[3] Id. at 60-69. Penned by Associate Justice Oscar V. Badelles and concurred in by Associate Justices Richard D. Mordeno and Jill Rose S. Jaugan-Lo of the Twenty-First Division, Court of Appeals, Cagayan de Oro City.

[4] Id. at 81-83.

[5] Id. at 37-43. Penned by Presiding Judge Isah J. Echem-Tangonan.

[6] Rules and Regulations Implementing Republic Act No. 9006, Otherwise Known as the "Fair Elections Act," In Connection with the 09 May 2016 National and Local Elections (2016).

[7] An Act to Enhance the Holding of Free, Orderly, Honest, Peaceful, and Credible Elections Through Fair Election Practices (2001).

[8] OMNIBUS ELECTION CODE (1985).

[9] See rollo, p. 61.

[10] Id. at 61-62.

[11] Id.

[12] Id. at 62-63.

[13] Id. at 64-66.

[14] Id.

[15] Id.

[16] Id. at 37-43.

[17] Id. at 43.

[18] Id. at 41-43.

[19] Id.

[20] See Appellant's Brief; id. at 46-59.

[21] Id. at 60-69.

[22] Id. at 69.

[23] Id. at 66-68.

[24] Id. at 70-77.

[25] Id. at 82-83.

[26] Id. at 80.

[27] Id. at 82.

[28] Id. at 81.

[29] Id. at 85.

[30] Id. at 11-12.

[31] *Denila v. Republic*, 877 Phil. 380, 438-439 (2020) [Per J. Gesmundo, Third Division].

[32] 800 Phil. 50 (2016) [Per J. Jardeleza, Third Division].

[33] Id. at 64.

[34] Rollo, p. 82.

[35] See *Francisco v. Portugal*, 519 Phil. 547, 555-557 (2006) [Per J. Tinga, Third Division].

[36] The campaign period for candidates of elective regional, provincial, city, and municipal officials was from March 25, 2016 to May 7, 2016. See COMELEC Resolution No. 9981 entitled, "In the Matter of Prescribing the Calendar of Activities and Periods of Certain Prohibited Acts in Connection with the May 09, 2016 National and Local Elections," (2015).

[37] Rollo, pp. 42-43, 67-69.

[38] See *People v. Sota*, 821 Phil. 887, 899 (2017) [Per J. Martires, Third Division].

CONCURRING OPINION

LEONEN, SAJ.:

Freedom of speech is often called a primordial right.[1] In a way, all other freedoms rest on the freedom of speech. As a United States Supreme Court Justice said, speech is the beginning of thought and the right to think is the beginning of freedom.[2] Thus, speech is the beginning of freedom itself.

I concur with the affirmation of the accused's conviction for violation of Section 34 of Commission on Elections Resolution No. 10049, in relation to Sections 6.6 and 13 of Republic Act No. 9006 and Section 264 of Batas Pambansa Blg. 881.

The prohibition against any mass media columnist, commentator, announcer, report, on-air correspondent or personality who is a candidate for any elective public office from practicing their media related profession during

campaign period[3] may, at the first impression, appear to be a curtailment of free speech. On the contrary, the provision is designed to protect free speech to the benefit of candidates, media practitioners, and, above all, the electorate.

The Court has long affirmed the validity of legislation setting limitations on candidates' right to free speech and access to mass media.[4] It is congruous to the express constitutional mandate of the Commission on Elections to regulate the enjoyment or utilization of franchises or permits for the operation of media of communication or information.[5] Any exercise of such supervisory or regulatory powers must be for the purpose of ensuring equal opportunity, time, and space for public information campaigns and forums among candidates.[6]

Requiring commentator-candidates to take a leave of absence from their work during campaign period will better ensure equal opportunity, time, and space to exercise free speech.

If commentator-candidates were allowed to carry on their media related professions during the campaign period, opponents are left at an undue disadvantage. The rule prevents a monopoly by commentator-candidates over channels of expression.

National Press Club v. Commission on Elections[7] involved a law prohibiting mass media from selling or donating print space or airtime for campaign or other political purposes. Instead, the Commission on Elections was to procure print space to be divided equally without charge among all candidates. Representatives of mass media, candidates, and taxpayers assailed the constitutionality of the provision.[8] On reading the freedoms of speech, of expression, and of the press with the imperatives of equal opportunity, time, and space, the Court said:

It is difficult to overemphasize the special importance of the rights of freedom of speech and freedom of the press in a democratic polity, in particular when they relate to the purity and integrity of the electoral process itself, the process by which the people identify those who shall have governance over them. Thus, it is frequently said that these rights are accorded a preferred status in our constitutional hierarchy. Withal, the rights of free speech and free press are not unlimited rights for they are not the only important and relevant values even in the most democratic of polities. In our own society, equality of opportunity to proffer oneself for public office, without regard to the level of financial resources that one may have at one's disposal, is clearly an important value. One of the basic state policies given constitutional rank by Article II, Section 26 of the Constitution is the egalitarian demand that "the State shall guarantee equal access to opportunities for public service and prohibit political dynasties as may be defined by law." [9]

In the same way that airtime may be limited by law or the Commission on Elections, so, too, can commentator-candidates be prevented momentarily from practicing their media related profession. Otherwise, commentator--candidates will effectively be able to enjoy airtime in circumvention of airtime limits by claiming they were merely practicing their profession and not advertising themselves. The mandatory leave of absence on commentator--candidates is not an absolute ban on media reporting, opinion or commentary about candidates, their qualifications, platforms, and promises. Quite the opposite, it is to ensure that mass media remain free of undue influence to carry out their regular and normal information and communication operations.[10]

The measure not only levels the electoral race to the benefit of all candidates, but more importantly favors the electorate as well. A domination by commentator-candidates of airtime impairs the speech of other candidates and of the public. The very candidates who should be the subject of political speech ought not to be given control of the available fora. Freedom of speech and of expression are rendered meaningless if avenues for speech and expression are deprived from dissenters.

Preventing commentator-candidates from practicing their media related professions encourages the right of people to participate in public affairs, including the right to criticize candidates seeking public office.[11] The

marketplace of ideas is democratized rather than skewed in favor of a few. After all, the marketplace of ideas works by "exposure to the ideas of others [allowing] one to 'consider, test, and develop their own conclusions.'"[12] "[F]ree speech may 'best serve its high purpose when it induces a condition of unrest, creates dissatisfaction with conditions as they are, or even stirs people to anger.'"[13]

The audience-electorate looks to a mass media columnist, commentator, announcer, report, on-air correspondent or personality for credible and reliable information. It is hard enough for the audience-electorate to sort through misinformation and disinformation. If commentator-candidates are permitted to muddle the practice of their profession with campaigning for themselves or their parties, the marketplace of ideas is contaminated with self-interest. The mandatory leave of absence imposed on commentator-candidates during the campaign period is more accurately depicted as a limitation on self-promotion harmful to the audience-electorate, not of free speech.

On a final note, the warning issued by the Court in *National Press Club* seems even more relevant today with the advent of the internet and smartphones:

[T]he nature and characteristics of modern mass media, especially electronic media, cannot be totally disregarded. Realistically, the only limitation upon the free speech of candidates imposed is on the right of candidates to bombard the helpless electorate with paid advertisements commonly repeated in the mass media ad nauseam. Frequently, such repetitive political commercials when fed into the electronic media themselves constitute invasions of the privacy of the general electorate. It might be supposed that it is easy enough for a person at home simply to flick off his radio or television set. But it is rarely that simple. For the candidates with deep pockets may purchase radio or television time in many, if not all, the major stations or channels. Or they may directly or indirectly own or control the stations or channels themselves. The contemporary reality in the Philippines is that, in a very real sense, listeners and viewers constitute a "captive audience."

The paid political advertisements introjected into the electronic media and repeated with mind-deadening frequency, are commonly intended and crafted, not so much to inform and educate as to condition and manipulate, not so much to provoke rational and objective appraisal of candidates' qualifications or programs as to appeal to the non-intellective faculties of the captive and passive audience. The right of the general listening and viewing public to be free from such intrusions and their subliminal effects is at least as important as the right of candidates to advertise themselves through modern electronic media and the right of media enterprises to maximize their revenues from the marketing of "packaged" candidates.[14] (Citations omitted)

Free speech may be liberating when all are afforded meaningful opportunity to participate. Mass media can be utilized to amplify voices that would otherwise go unheard. Without supervision and regulation, it is also susceptible to becoming propaganda reserved for and weaponized by the political elite. It descends into a tool to perpetuate inequality. The ruling of the Court here affirms the transcendence of free speech and ensures that the perfectly equal enjoyment of this right is approximated.

ACCORDINGLY, I concur. The Petition should be DISMISSED.

[1] *Diocese of Bacolod v. Commission on Elections*, 751 Phil. 301, 403(2015) [Per J. Leonen, En Banc].

[2] *Id.* at 355, citing *Freedom of Speech and Expression*, 116 HARV. L. REV. 272, 277 (2002), quoting Justice Kennedy in *Ashcroft v. Free Speech Coalition*, 122 S. Ct. 1389, 1403 (2002).

[3] Republic Act No. 9006, sec. 6.6.

[4] See *National Press Club v. Commission on Elections*, 283 Phil. 795, 809-810 (1992) [Per J. Feliciano, En Banc].

[5] CONST., art. IX (C), sec. 4.

[6] CONST., art. IX (C), sec. 4.

[7] 283 Phil. 795 (1992) [Per J. Feliciano, En Banc].

[8] Id. at 807.

[9] Id. at 810.

[10] See Id., at 812-813 (1992) [Per J. Feliciano, En Banc].

[11] See *Diocese of Bacolod v. Commission on Elections*, 751 Phil. 301, 351 (2015) [Per J. Leonen, En Banc].

[12] *Diocese of Bacolod v. Commission on Elections*, 751 Phil. 301, 361 (2015) [Per J. Leonen, En Banc] citing *The Impermeable Life: Unsolicited Communications in the Marketplace of Ideas*, 118 HARV. L. REV. 1314 (2005), citing *Abrams v. United States*, 250 U.S. 616, 630 (1919).

[13] *Diocese of Bacolod v. Commission on Elections*, 751 Phil. 301, 332 (2015) [Per J. Leonen, En Banc] citing *Gonzales, et al. v. Commission on Elections*, 137 Phil. 471, 493 (1969) [Per J. Fernando, En Banc], citing further *Terminiello v. City of Chicago*, 337 U.S. 1, 4 (1949).

[14] 283 Phil. 795, 816-817 (1992) [Per J. Feliciano, 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.