

ISIDRO T. HILDAWA, PETITIONER, VS. MINISTER OF DEFENSE, HON. JUAN PONCE ENRILE; CHIEF OF STAFF, GEN. FABIAN VER AND GEN. PROSPERO OLIVAS, CHIEF, THE PC METROCOM & METRO-POLITAN ...

G.R. No. 67766. August 14, 1985

Ponente: RELOVA, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-67766/>

RELOVA, J.:

Petitioners Isidro T. Hildawa and Ricardo C. Valmonte in these Special Civil Actions for "Declaration of Nullity of Executive/Administrative Order Creating Secret Marshals with Prayer for Restraining Order" and for "certiorari/ Prohibition with Preliminary, Injunction/Restraining Order," pray that a "preliminary injunction issue directing respondents to recall the crimebusters and restraining them from fielding police teams or any of this sort with authority/license to kill and after hearing, declaring the order of respondents fielding crimebusters null and void and making the injunction permanent." They alleged that the formation and fielding of secret marshals and/or crimebusters with absolute authority to kill thieves, holduppers, robbers, pickpockets and slashers are violative of the provisions of the New Constitution, to wit:

- No person shall be deprived of life; liberty or property without due process of law nor shall any persons be denied the equal protection of the laws. (Constitution, Article IV, Section 1)
- No person shall be held to answer for a criminal offense without due process of law. (Id., Section 17)
- In all criminal prosecutions, the accused shall be presumed innocent until the contrary is proved, and shall enjoy the right to be heard by himself and counsel, to be informed of the nature and cause of the accusation against him, to have a speedy, impartial and public trial, to meet the witnesses face to face, and to have compulsory process to secure the attendance of witnesses and production of evidence in his behalf. However, after arraignment, trial may proceed notwithstanding the absence of the accused provided that he has been duly notified and his failure to appear is unjustified. (Id., Section 19)
- No person shall be compelled to be a witness against himself. Any person under investigation for the commission of an offense shall have the right to remain silent and to counsel, and to be informed of such right. No force, violence, threat, intimidation, or any other means which vitiates the free will shall be used against him. Any confession obtained in violation of this section shall be inadmissible in evidence. (Id., Section 20)
- Excessive fines shall not be imposed nor cruel or unusual punishment inflicted. (Id., Section 21)
- The Supreme Court shall have the following powers:

x x x x x x x x

(2) Review and revise, reverse, modify or affirm on appeal or certiorari as the law or the Rules of Court may provide, final judgments and decrees of inferior courts in —

x x x x x x x x

(d) all criminal cases in which the penalty imposed is death or life imprisonment. x x x (Id., Section 5)

In their comment, respondents denied the existence of an executive or administrative order authorizing secret marshals or crimebusters to shoot and disable suspected criminals. They are subject to the same law as other peace officers. They do not enjoy any more immunity than are enjoyed by all law enforcement officials. The formation and fielding of these special operation teams in Metro Manila, or the crimebusters as they are now known "was impelled by the proliferation of robbery/holdups and other crimes against passengers of public conveyances." (p. 4, Respondents' Comment in G. R. No. 70881)

Petitioners failed to present copies of the alleged executive or administrative order. They even admitted in Court that they have not seen, much less, read one.

There is nothing wrong in the creation and deployment of special operation teams to counter the resurgence of criminality, as there is nothing wrong in the formation by the police of special teams/squads to prevent the proliferation of vices, prostitution, drug addiction, pornography and the like. That is the basic job of the police. It is the alleged use of violence in the implementation of the objectives of the special squads that the court is concerned about. They have the support, commendation and applause of the people when they apprehend violators of the law to be brought to the courts of justice for their prosecution and punishment if found guilty. What is bad is if they kill these "criminals" because then they are not only law enforcers but also the prosecutors, the judges and the executioners. For, if in maintaining peace and order, the peace officer becomes the person to be feared the citizen will find himself between the criminal and the lawless public official. Violence does not find support in a democratic society where the rule of law prevails. It is our way of life that a man is entitled to due process which simply means that before he can be deprived of his life, liberty Or property, he must be given an opportunity to defend himself. Due process of law requires that the accused must be heard in court of competent jurisdiction, proceeded against under the orderly process of law, and only punished after inquiry and investigation, upon notice to him, with an opportunity to be heard, and a judgment awarded within the authority of a constitutional law. (Ong Chang Wing vs. U.S., 40 Phil. 1049)

Thus, when a person is killed by another the burden of proving self-defense on the assailant. It becomes his duty to establish this justifying circumstance by evidence clear and convincing. He must rely on the strength of his own evidence. It matters not that the People's evidence is weak. He must show that (1) he is not the unlawful aggressor; (2) there was lack of sufficient provocation on his part; and, (3) he employed reasonable means to prevent or repel the aggression.

Considering the allegations of the petition as well as the comment of the respondents and after hearing the parties, We repeat that it is lawful on the part of respondents to form special operation teams of whatever name they may be called to combat the upsurge of crimes against passengers of public utility vehicles. What is disagreeable and cannot be tolerated, for it is uncivilized, is the license to kill because it is violative of our fundamental law and the universal human right. In fact, "no violence or unnecessary force shall be used in making an arrest, and the person arrested shall not be subject to any greater restraint that is necessary for his detention (Section 2, par. 2, Rule 113 of the Rules of Court)."

The Solicitor General, representing the respondents, in his COMPLIANCE to the resolution of this Court, dated June 11, 1985, requiring him "to submit the data and updated report(s) conducted thereon by the authorities relative to the killing of the victims by the 'Secret Marshalls' or 'Crime Busters' operations," reports that from May 4, 1985 to May 9, 1985, fifteen (15) alleged holduppers were killed by Policemen; that the cases against the latter have been filed with the Judge Advocate General's Office (JAGO); and, that in the meantime, the said policemen involved have been ordered released.

In this connection, whenever a person suspected of a crime is killed under the circumstances alleged during the hearing, the National Police Commission (NAPOLCOM) should investigate to find out who the assailant was and the reason for the death of the victim. It need not wait for a formal complaint to be lodged by the relatives of the deceased. In fact, the alleged killings by the special operation teams (popularly known as crimebusters) as reported in the dailies should be looked into for determination of the truth of the reports and for proper action. Once the identity of the killer(s) has been established and the latter having admitted that he is the author of the death of the deceased, the investigating officer should file a case in the proper court or tribunal which will determine whether or not the killing was made in self-defense, defense of relatives, defense of stranger or in the fulfillment of a duty.

WHEREFORE, the respondents are directed to exercise strict supervision and control over these special operation teams, formed to conduct a concentrated campaign against criminal elements preying on passengers of jeepneys, buses, taxis and all other forms of public conveyance and, members of these special teams are ordered that in making arrests they should not use unnecessary force, should comply strictly with the law, and accord to the suspects, all their constitutional rights.

Further, should death or injury result from the apprehension of the suspected criminal(s), respondents are hereby enjoined to immediately report the matter to their superior officers and the National Police Commission (NAPOLCOM) for investigation and appropriate action.

SO ORDERED.

Concepcion, Jr., Abad Santos, Melencio-Herrera, Plana, De la Fuente, Cuevas, and Alampay, JJ., concur.

Makasiar, C.J., concurring. Since it is not established that the respondents have authorized the killing of criminals in violation of their constitutional rights, they should merely be reminded, not directed, to always respect the constitutional rights of criminals.

Escolin, J., I agree with the views of J. Gutierrez, Jr..

Gutierrez, Jr., J., please see concurring opinion.

Teehankee, J., see separate opinion.

Aquino, J., I dissent. In the Valmonte case, the petitioner has no cause of action for certiorari and prohibition.

In the Hildawa case this Court has no jurisdiction over the petition for "declaration of nullity of executive/administrative order creating secret marshals."

These two cases should have been DISMISSED OUTRIGHT. Petitioners' remedy is in other fora.

CONCURRING OPINION

GUTIERREZ, JR., J.:

I am in full concurrence with the Court's decision penned by my distinguished colleague, Justice Lorenzo Relova, whose concern for human rights is not only deep and abiding but is also a matter of public knowledge in legal circles.

The organization of special police teams to combat resurgent forms of criminality is valid, proper, and necessary. Considering the wide publicity given by media to victims of apparent "salvaging", there is also a need to always

remind police and military officers, whatever their assignments, to scrupulously respect the constitutional and statutory rights of apprehended criminals, never to take the law into their own hands. No matter how reprehensible a criminal's acts may be, he is still entitled to due process and to the constitutional protection accorded to all citizens. In the process of curbing criminality, the police and the military should not themselves descend to acts of criminality.

I am writing this separate opinion only to emphasize that there is no evidence whatsoever that the special teams have been given orders to liquidate robbers, holduppers and the like. On the contrary, General Narciso Cabrera has strongly cautioned his men to respect the rights of criminal elements they may encounter or apprehend. If the members of the special teams or the "crimebusters" commit lawless acts, they do so against the orders of the respondents and should be prosecuted for their acts. The Compliance filed by the Solicitor-General on July 23, 1985 shows that even in specific cases where the policemen claimed to have been shot at or attacked by hold-uppers and criminal elements, the incidents were still ordered fully investigated. I agree that in such cases an investigation by officers other than the police themselves is more appropriate.

In truth, the vicious nature of some killings described in the affidavits submitted by the petitioners is such that it should not be attributed to special operations teams who are fielded on a regular and indifferent basis and who have absolutely no idea whom they may encounter in the course of their assignments. Assuming that these police teams immediately shoot robbers and holduppers caught in flagrante, the killing would not be characterized by torture or barbaric brutality. Whoever kills with vicious brutality does so with vengeance in mind, not because he is assigned to a special operations team. To me, it is apparent that lawless persons, be they police or criminal elements, are passing on their savage acts as having been perpetrated by special teams of crimebusters. This is most unfair and fraught with undesirable consequences.

The problems of criminality in Manila and other urban centers are herculean in their formidability. Not only have criminal elements been drawn like flies to the metropolis, but the police have been hampered in their work by lack of logistics and incentives. The job of the police is difficult enough without our doing or stating anything that may tend to lower their morale. The Manila Police Department has a well earned tradition of excellence and discipline. It sets the pace for police forces all over the country. Dedicated officers have headed the Department, now Western Police District, Commanders of other districts have been drawn from its ranks. The present commander, respondent Brigadier, General Narciso Cabrera, is a quietly competent gentleman who maintains the honorable traditions of his predecessors.

Even as we call for the investigation and prosecution of those responsible for the vicious killings mentioned by the petitioners, we should set the record straight and at the same time commend the majority of police officers who perform their tasks faithfully and who are as appalled as anybody by any indiscriminate and lawless acts of violence. A few bad eggs in the police force or worse, non-police or civilian criminals taking advantage of the situation should not diminish the people's respect for Manila's Finest as an institution.

SEPARATE OPINION

TEEHANKEE, J.:

The Court's opinion penned by Mr. Justice Relova recognizes that "there is nothing wrong in the creation and deployment of special operation teams to counter the resurgence of criminality" but stresses that "what is bad is if they kill these 'criminals' because then they are not only law enforcers but also the witnesses,[1] the prosecutors, the judges and the executioners. For, if in maintaining peace and order, the peace officer becomes the person to be

feared the citizen will find himself between the criminal and the lawless public official. Violence does not find support in a democratic society where the rule of law prevails. It is our way of life that a man is entitled to due process which simply means that before he can be deprived of his life, liberty or property, he must be given an opportunity to defend himself." [2]

After taking note of respondents' comment denying that the secret marshals formed by the Police in Metro Manila (and renamed as "crimebusters" this year) were given a license to kill or enjoy any more immunity than other law enforcement officials, but that their fielding "was impelled by the proliferation of robbery/holdups and other crimes against passengers of public conveyances," [3] the Court's judgment likewise lays down specific injunctions and norms of conduct and procedure in the event of any killings by these teams of secret marshals or "crimebusters", which may be succinctly summarized as follows: [4]

1. "... the respondents are directed to exercise strict supervision and control over these special operation teams and, members of these special teams are ordered that in making arrests they should not use unnecessary force, should comply strictly with the law, and accord to the suspects all their constitutional rights;"
2. Whenever there is a killing or infliction of injury by such secret marshals or "crimebusters", "respondents are hereby enjoined to immediately report the matter to their superior officers and the National Commission (NAPOLCOM) for investigation and appropriate action;"
3. The National Police Commission as the entity charged with direct authority over the members of the Integrated National Police should forthwith "investigate to find out who the assailant was and the reason for the death of the victim. It need not wait for a formal complaint to be lodged by the relatives of the deceased;" and
4. "Once the identity of the killer(s) has been established and the latter having admitted that he is the author of the death of the deceased, the investigating officer should file a case in the proper court or tribunal which will determine whether or not the killing was made in self-defense, defense of relatives, defense of stranger or in the fulfillment of a duty," bearing in mind that "when a person is killed by another, the burden of proving self-defense or some other justification lies on the assailant."

I fully concur with the Court's, above remedial measures ordering the secret marshals or "crimebusters" to accord due process and respect for the constitutional rights of suspects and discharge in court the burden of proving the justification for taking their lives. These are preventive and deterrent measures which normally should suffice to curtail the substantive evils sought to be curbed. But given the background facts and the environmental circumstances as herein set forth, I would further grant the petition for the disbanding of the secret marshals by whatever name they may be called.

As stated in the Court's judgment, these "special operation teams (were) formed to conduct a concentrated campaign against criminal elements preying on passengers of jeepneys, buses, taxis and all other forms of public conveyance." The reactivation of the marshals was admittedly upon mere verbal orders of the President "to intensify the drive against robbery-holdups." [5] But there was over-reaction far beyond the pale of the law and the Constitution. Then Major General Prospero Olivas, Chief of the PC Metrocom and the Metropolitan Police Force pursuant thereto fielded 760 "secret marshals" in Metro Manila as designated over-all commander, among them "The 160 INP field force members were assigned to protect bus passengers in the 13 principal bus routes in Metro Manila. Trained in ranger tactics and jungle warfare, they will be in uniform with their nameplates, and will be adequately armed." [6] Troops trained in "ranger tactics and jungle warfare" have no place in the urban centers and should not be utilized in plain police action involving tens of thousands of daily commuters and students (on whose behalf petitioners have filed the present action, including themselves and their families, fearful of "exposing themselves to the risk and danger of encountering secret marshals or be caught in the crossfire" [7]).

The cure is thus worse than the ailment. The only logical way to counter the great danger thus created for the innocent populace is to dismantle and outlaw the existence of such a dangerous strike force, whom they cannot distinguish from the criminal elements themselves. The record, too, of 160 lives of alleged holdup men killed is far too costly and reflects an apparent wanton disregard for the sanctity of human life: "RECORD. The secret marshals were first organized on August 8, 1982. During their activation up to May 31, 1984 the force reportedly had killed 106 holdup men and arrested 128 others." [8] In a number of these reported cases, it readily appears that the means used to apprehend the suspects cannot be justified: instead of merely disabling the suspects, the marshals had no compunction about shooting them fatally in the head and other vital parts of the body. A striking instance of the low regard for human life is the recent case of Juan P. Anunciacion, 26, a detainee at the Quezon City jail facing carnapping charges, who was "so depressed over his life inside the jail" and over his failure to raise bail. He was shot dead in the head by his police escort, as he allegedly tried to escape on his way to attend a court hearing. According to the press report, "(P)robbers recovered from Anunciacion's body two letters, one coming from his wife, Rosy and another to his mother which implied that he was intending to escape or commit suicide." The police cynically concluded that the suspect-fatality "had intended to commit 'suicide by escaping from his escort.'" [9] As the writer stressed at the hearing of these cases in relation to respondents' remark on the perversity of the criminals nowadays: "In a democratic state, you don't stoop to the level of criminals. If we stoop to what they do, then we're no better than they ... there would be no difference."

Petitioners Isidro T. Hildawa and Ricardo C. Valmonte, and former Senator Ambrocio Padilla and Atty. Emmanuel Mendoza, as collaborating counsels, all members of the Philippine Bar, are to be commended for their civic-minded initiative and concern for basic constitutional values and the primacy of human rights over property rights in filing the petitions at bar. The Supreme Court stands as the guarantor of the constitutional and human rights of all persons within its jurisdiction and cannot abdicate its basic role under the Constitution that these rights be respected and enforced. The spirit and letter of the Constitution negates as contrary to the basic precepts of human rights and freedom that a person's life be snuffed out without due process in a split second even if he is caught in flagrante delicto — unless it was called for as an act of self-defense by the law agents using reasonable means to prevent or repel an unlawful aggression on the part of the deceased. [9-a]

Ever since the metropolitan newspapers reported in 1978 incidents of alleged carnappers, holduppers, robbers, drug pushers or other suspected criminal elements with handguns reportedly engaging well-armed military or police or other law agents in shootouts and getting riddled with armalite bullets in the process, there has been great concern that there appeared to be no official investigation and verification of the incidents and confirmation or otherwise of the justification for the killings and that it behooves the authorities and all who believe in the inherent dignity and worth of every human being and in his God-given an inviolable human rights the essence of which is the right to life, liberty and security of person as declared in the Universal Declaration of Human Rights to see to it that the military and the police do not thin that they have a license to kill with impunity and do not constitute themselves as law enforcer, witness, prosecutor, judge and executioner. Death is so final and irreversible and the common concern is: "What if the man killed by the police is innocent and not a criminal after all" — simply because he struck them as "suspicious-looking."

The press has long taken note of such killings. In its October 20, 1981 editorial entitled: "Salvage Operation: Is it moral, legal?", the Philippines Daily Express flatly stated that

"What appears certain at this point is that some law enforcers do engage in salvage operations. The past several years particularly, many suspected carnappers, cop killers holdup men, and notorious characters have been reportedly killed by law enforcers in alleged shootouts and escape attempts.

"The very nature of the salvage operation — that of doing away with a recalcitrant troublemaker — presumably

precludes official sanction or authorization. But whether all the salvage operations had the knowledge or the blessings of higher-ups in the police command is not known.

"It would seem that some people in the force have accepted the salvage operation as an effective and swift way of instilling fear in the hearts of criminals or doing away with hopelessly notorious and dangerous thugs.

"But is it? Does it not push criminals to the wall and make them more desperate and vicious? Will not this ultimate violence beget the same violence, as probably it has already done? Does it not contribute to a climate of viciousness where the rule of the gun is supreme?

"And what of the moral and legal aspects? Isn't a suspect deemed innocent until proven guilty? What happens to due process of law? Can law enforcers be judges and executioners, too? Were all salvage victims hopelessly notorious and dangerous to society? Were they really guilty of the crimes imputed to them?

"A debate on the practical, moral, and legal implications of the salvage operation would have to summon a legion of arguments. The debate, in fact, could be endless. We feel, though, that it should at least be initiated. A reassessment of the practice by some law enforcers is in order."

Earlier, on April 12, 1981, the writer had proposed to the Integrated Bar of the Philippines 5th House of Delegates that "it would be worthy of the Integrated Bar to consider the creation of a committee that would monitor and follow up such incidents which are reported practically daily and see to it that they be officially and thoroughly investigated and assure that human life is not taken with impunity under the guise of police or military operations by the very persons called upon to uphold and enforce the law." This drew an affirmative response from the IBP top officers (although with a weak implementation at the time), as well as from the PC Chief, Major General Fidel V. Ramos, who issued the following basic guidelines:

"SELF-DEFENSE

"1. The only justification for law enforcers to kill criminals is self-defense which can only be resorted to when the risk of subduing them peacefully will result in the death of law enforcers or citizens.

"2. The primary duty under the criminal-justice system is to arrest offenders and initiate court action against them.

"Ramos said that the PC will not tolerate lawmen becoming prosecutors, judges and executioners of offenders.

"3. All cases of encounters with criminals being arrested or escaping prisoners, as a matter of standard operating procedure, shall be covered by autopsy and investigation reports." [10]

The reactivation of close to a thousand secret marshals was announced last June, 1984 following a wave of robberies on public transportation vehicles. In five days, June 18-22, 1984, they chalked up a record "body count" of 24 suspected criminals in Metro Manila, including a youth, who, according to his parent, was about to return to his job in Saudi Arabia.[11] The 25th victim gunned down at early dawn of Sunday, June 24, 1984, was reportedly about to hold up jeepney passengers at F.B. Harrison and aimed at the marshals what turned out to be a toy pistol (shaped like a .45 caliber). They shot him dead on the spot with a bullet in the forehead and two in the chest.[12] This is a record of some sort: 25 suspects gunned down in one week as against only about 32 suspected holduppers killed by the marshals when they were first activated during the period of five months between August and December, 1982.[13] Indeed, violence breeds more violence and many have raised the alarm.

The Catholic Bishops Conference in their joint pastoral letter to the nation entitled "Let there be Life" denounced the fielding of secret marshals which led to the "further eroding of the sanctity of life" with these words "(W)e cannot but be disturbed and apprehensive at the idea of appointing officers of law, unrecognizable as such to the general public, with full authorization — if they indeed have such authorization — to hunt people down and

summarily dispose of them. This goes against our Christian concept of man and the value we put on human life. 'Criminals', no matter how base, do not become by the fact of their crime (unproven in any case) brute animals, losing all claims to rights, to bodily integrity, due process and the like."

With the resurgence of activities of holduppers and robbers this year, the secret marshals were reactivated once more as "crimebuster operations" in May of this year. As stated in the Court's decision,[14] the last report submitted by the Solicitor General covering the period of six days from May 4, 1985 to May 10, 1985 listed a total of fifteen (15) alleged holduppers killed by policemen; cases against them have been filed with the Judge Advocate General's Office but in the meantime the policemen involved have been ordered released. The total number of suspected holduppers killed by secret marshals in these operations which had been described "as an anomaly that could easily turn into a nightmare to the citizens and no assurance can dispel this dread," has been estimated at over forty.[15] The operations have given rise to protests from no other than the City Mayor of Manila, Ramon Bagatsing himself, who denounced the use of marshals as a "violation of human rights" and urged the use by the Manila police force of "more civilized" ways saying that "you do not kill a person on mere suspicion of committing a crime. The death penalty is imposed only after a person has been charged, tried and convicted." [16] Metro Manila Vice Governor Ismael Mathay, Jr. in reportedly calling for the dismantling of these secret marshals is quoted as saying that "no one is licensed to kill." [17]

The Catholic Bishops Conference of the Philippines and the Mixed Commission of Bishops and Religious in their statement of June 7, 1985 urged the disbanding of the "so-called crimebusters or special operation teams once and for all," saying that they ".... join their voices to an ever increasing number of Filipinos, both public officials such as Vice Gov. Ismael Mathay and Manila Mayor Ramon Bagatsing and private citizens in condemning the summary executions of suspected criminals, some of whom were peace-loving citizens and not trouble makers at all (and) the bishops, as pastors of their flock, cannot condone the violation of the people's human rights which law officers are supposed to uphold and defend." [18]

It is imperative as a matter of basic justice to the victims, as well as to the majority of conscientious and law-abiding police officers who faithfully perform their duties against all odds that the investigation and filing of the proper cases in court against the killers-marshals be expedited and duly decided, as now enjoined by the Court. With the transfer of authority particularly "administrative control and supervision" over the Integrated National Police from the Ministry of National Defense to the President through the National Police Commission and the corollary transfer of exercise of "operational supervision and direction" over them to the city and town mayors,[19] it is hoped that the permanent dismantling of such secret marshals or "crimebusters" as urged by the Metro Manila Vice Governor and the City Mayor of Manila and their replacement by uniformed identifiable policemen may soon become a reality. I vote to grant the petition.

[1] Word supplied.

[2] Decision at page 4.

[3] At page 4.

[4] Pages 5-6, Decision.

[5] Solicitor General's Comment in G.R. No. 67766, p. 28, Record.

[6] Hildawa's petition in G.R. No. 67766, p. 3; Business Day issue of June 20, 1984, Annex A, petition.

[7] Hildawa's petition, page 4.

- [8] Idem, Business Day issue of June 20, 1984.
- [9] Bulletin Today issue of August 8, 1985.
- [9-a] See Morales, Jr. vs. Enrile, 121 SCRA 538, 553, 563.
- [10] The Manila Evening Post issue of April 15, 1981.
- [11] A. Batalla, Bulletin Today issue of June 24, 1984.
- [12] Bulletin Today issue of June 25, 1984.
- [13] See Bulletin Today issue of June 19, 1984.
- [14] At page 5.
- [15] Antonio Ma. Nieva, Times Journal issue of May 15, 1985.
- [16] Times Journal issues of May 11 and 15, 1985.
- [17] Times Journal issue of June 7, 1985.
- [18] Bulletin Today issue of June 8, 1985.
- [19] Bulletin Today issue of August 9, 1985.

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.