

**PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS.
VICTORIANO CUA, ALIAS “VIC”; ERLINDA CUA, ALIAS
“LINDA”; RODOLFO ANDAL, JESSIE MONTANO Y
BENSAY, RODOLFO ILUMEN Y TORRES, NATA...**

G.R. No. 82292. May 25, 1994

Ponente: PADILLA, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-82292/>

PADILLA, J.:

An information, dated 3 July 1986, was filed by Assistant Provincial Fiscal of Pangasinan, Romulo C. Resultan, with the Regional Trial Court, Branch 57, of San Carlos City (Pangasinan), in Crim. Case No. SCC-1136, charging the accused with the crime of Kidnapping for Ransom, committed as follows:

"That on or about June 5, 1986, in the evening, the above-named accused, confederating and conspiring together and mutually helping one another, armed with a handgun, teargas and balisong, and with evident pre-meditation, did then and there, wilfully, unlawfully and feloniously, with the use of force, violence and intimidation, kidnap one SI KIAM LIN y CHAN for the purpose of extorting ransom in the amount of P400,000.00 at Novaliches, Metro Manila, and thereafter took him with the use of a motor vehicle to barangay Tampog and then to Barangay Ligue, municipality of Bayambang, province of Pangasinan and within the jurisdiction of this Honorable Court, where he was kept under detention against his will until he was rescued by elements of the INP of Bayambang, Pangasinan, on the morning of June 9, 1986.

Contrary to Article 267 of the Revised Penal Code."[1]

Upon arraignment on 8 August 1986, each of the accused pleaded not guilty. Thereafter, trial proceeded and both prosecution and defense adduced their respective evidence. On 11 November 1987, the court a quo rendered judgment* finding the six (6) accused "guilty beyond reasonable doubt of the crime of kidnapping for ransom, defined and punished under Art. 267, of the Revised Penal Code," and sentenced each of them to suffer the penalty of reclusion perpetua, instead of death as provided in said Art. 267, due to the qualified removal of the death penalty by the 1987 Constitution.[2]

Except for accused spouses Victoriano Cua and Erlinda Cua who jumped bail at the early stage of the trial and Natalio Ilumen who was earlier discharged from the case on motion of the prosecution without any objection from the defense,[3] the case is before us for review after notices of appeal were filed by accused-appellants Jessie Montano, Silvestre de la Cruz, Rodolfo Andal and Rodolfo Ilumen.

The material facts and events as found by the court a quo are:

"The evidence of the prosecution shows that about 1:00 o'clock in the afternoon of June 5, 1986 Si Kiam Lin, a Chinese national, received a telephone call at his home in Makati, Metro Manila, from the spouses Victoriano Cua and Erlinda Cua, his acquaintances of one year and whom he identified later in Court, informing Si that they knew of some scrap iron for sale at a cheap price. Si is engaged in the buying and selling of scrap iron. Si agreed to meet the couple that evening at around 6 or 7 o'clock. It was arranged that Si and Erlinda Cua would

meet at a certain grocery store at the Malinta exit of the North Expressway. Si and Erlinda met at the appointed place that evening. Si was driving his own car. Erlinda got in the car and directed Si to proceed to Novaliches where at a certain place they stopped near a sari-sari store. Erlinda alighted from the car, went to the store and talked to somebody. Si was about to get down from his car when Rodolfo Andal, Rodolfo Ilumin, Jesus Montano and Silvestre dela Cruz, whom Si identified in Court, suddenly appeared, pushed him roughly into the back seat of the car and handcuffed him. Then on orders of Erlinda Cua they divested him of the contents of his pockets consisting of a check for P20,000.00, a blank check, a dishonored check for P35,000.00 issued by Erlinda Cua, P500.00 in cash and his wristwatch (Exh. "D"). He was threatened that his head would be blown off with a gun pointed at his neck by Rodolfo Andal if he made any noise. Si was seated at the back seat of the car between Montano and dela Cruz while Erlinda Cua seated herself in the front seat with Rodolfo Andal and Rodolfo Ilumin who took the wheel. Si was driven around for sometime then brought to a dark isolated place which appeared to be a new subdivision under construction. There, he, Montano and dela Cruz got down. The others left with the car. He was placed in a cubicle about one meter square guarded by Montano and dela Cruz. At about 3:00 o'clock in the morning the same car came back. Si, Montano and dela Cruz were loaded into the car and they were driven by Rodolfo Ilumin to Tampog, Bayambang, Pangasinan, where they arrived in the early morning of June 6, 1986. The handcuffs of Si were removed when he complained that he was hurting. They were endorsed to Patricio Maregmen by Rodolfo Ilumin, brother-in-law of Maregmen. They were introduced by Ilumin to Maregmen as his 'Compadres'. At about 11:00 o'clock of the same day June 6, 1986 Rodolfo Ilumin left the place with the car. The three, Si, Montano and dela Cruz were left behind. They were taken care of by Maregmen.

In Tampog, Rosie Agbuya Maregmen left her home early in the morning of June 7, 1986 to wash clothes in the river. She is a neighbor and niece-in-law of Patricio Maregmen. Their houses are only two arm's length apart. Returning from her washing chores at about 9 or 10 o'clock that same morning she noticed three strangers in the one-storey house of Maregmen one of whom looked like a chinaman sitting in a corner of the house looking dejected, the other two (2) on each side. Rosie heard one of the two utter that they should have killed the chinaman on the way but anyway they will let him enjoy (*maglakuatsa*) first. Rosie wanted to talk to the chinaman but could not because the two guards were there. So she wrote a note on a small piece of paper. When the two finally left the chinaman's side and went to the rear of the house, she croached by the open door and threw the note towards the chinaman who picked it up. In the note Rosie offered to help, advised the chinaman to find a way to escape because the two intended to kill him and asked for his address and phone number (Exh. 'Y'). Then Rosie left to watch television in the house of her 'Ninang' Flor Prado. When she returned home at about 11:30 that morning the strangers including the chinaman were no longer in Maregmen's house. Rosie Maregmen identified Montano and dela Cruz in Court as the two (2) men with the chinaman.

Meanwhile, in Metro Manila in the afternoon of June 6, 1986 at around 4:30 Victor Uy, the son-in-law of the victim Si Kiam Lin and who resides with the victim in Makati, received at his office a telephone call from his mother-in-law directing him and his wife to go home immediately. Upon reaching home Victor was informed by his mother-in-law that an unidentified person called her up by phone demanding a ransom of P400,000.00 for Si Kiam Lin. Then the caller hung up. The next day June 7, 1986 between 12:20 and 12:30 in the afternoon another telephone call was received by Victor demanding P400,000.00 ransom for Si Kiam Lin with the threat on the life of Si if the ransom is not paid. Victor, however, responded that they could not raise the amount then because the banks were closed it being a Saturday. The caller hung up. On June 8, 1986 at around 9:30 in the evening another telephone call was received again by Victor. This time he was informed that if they wanted to hear the voice of the victim he was to proceed to the Plaza Fair near the Sta. Cruz church and there he will find a tape record rolled in a Tempo Newspaper. Some ten (10) minutes later another telephone call was received by the victim's wife again demanding a ransom of P400,000.00 or else they were going to kill the victim. Si Kiam Lin's wife did not answer. As instructed Victor recovered the tape record, (Exh. 'V') which was surrendered by him to the police authorities of Bayambang on June 9, 1986 after the victim was rescued in barangay Ligue.

After an overnight stay in Tampog the victim Si Kiam Lin, Montano and dela Cruz were fetched by Rodolfo Ilumin on June 7, 1986. They rode in a Pantranco bus up to the town proper of Bayambang, Pangasinan, where they transferred to two (2) tricycles which brought them to Barangay Ligue of the same municipality. Si Kiam Lin was confined in a small hut. The hut had no electricity so he was brought to a nearby house provided with electricity and there he was made to tape record a message to his family. Then Rodolfo Ilumin left, leaving Si Kiam Lin, Montano and dela Cruz in the hut. This is the same tape recovered by Victor Uy from the Plaza Fair in Sta. Cruz, Manila in the evening of June 8, 1986.

On June 8, 1986 at about 2:00 o'clock in the afternoon Barangay Captain Narciso Main, at Ligu, Bayambang, Pangasinan, was informed by a boy Renato de Vera about the presence of strangers and a chinaman in the barangay. Barangay Captain Main went to see his councilman Joaquin de Vera and inquired if he knew the strangers but de Vera answered that he was suspicious and he sensed that there was something wrong. That afternoon at about 5:00 o'clock Captain Main alerted his Barangay policemen about the presence of the strangers in the hut of Feliciano Alvarez and instructed them to be observant. At 2:00 or 3:00 o'clock the next morning Captain Main reported the presence of the strangers to Station Commander Efren Quilana at the Poblacion of Bayambang.

Station Commander Quilana (sic) gathered about a dozen of his men and riding in a fire truck with Captain Main they proceeded to Barangay Ligue to the vicinity of the hut where the victim was being held prisoner. The contingent arrived there at about 3:45 A.M. Since it was still dark and the policemen were warned by Captain Main that the two guards of the victim were armed, the policemen waited for daybreak. Station Commander Quilana (sic) divided his men into two teams and deployed them around the house. The team led by Patrolman Leon Macaso was designated to lead the assault on the hut. Between 5:00 and 6:00 o'clock Macaso and his team entered the hut through the kitchen at the back. Sensing that they were being raided Montano and dela Cruz jumped out of the hut but they were met by the team of Sgt. Quilana (sic). The two were ordered to lie flat on the ground but they persisted on running away. They were caught but they struggled. In the process the two were injured. Realizing the futility of escape the two finally obeyed and lay face flat on the ground. They were searched. Found in the person of Silvestre dela Cruz (a) a mission order No. H-045-86 dated June 3, 1986 issued to Silvestre dela Cruz (Exh. 'R'); (b) a plastic laminated CID identification card No. 173 (Exh. 'Q'); (c) a plastic laminated AFP enlisted person identification card (Exh. 'Q'); (d) appointment of Silvestre dela Cruz as an agent of the PILEP-CID dated January 21, 1986 (Exh. '5'); (e) a bronze CID badge No. 050 (Exh. 'P'); (f) a balisong knife (Exh. 'M') and (g) a pair of handcuffs (Exh. 'N'). From Motano confiscated were: (a) a professional driver's license (Exh. 'G'); (b) a one thousand yen paper note (Exh. 'L'); (c) a tear gas canister (Exh. 'F'); (d) a bronze CID badge No. 075 (Exh. 'H'); (e) a CID identification card (Exh. 'I'); (f) an appointment as a PILEP-CID agent (Exh. 'J'); (g) a mission order No. H-039-86 dated May 20, 1986 (Exh. 'K'); and (h) an armalite bullet (Exh. 'H')."[4]

In the present appeal, appellants assign the following errors to the court below:

"THE LOWER COURT ERRED IN HOLDING THE ACCUSED GUILTY OF THE CRIME OF KIDNAPPING FOR RANSOM UNDER ARTICLE 267 OF THE REVISED PENAL CODE.

THE LOWER COURT ERRED IN ALLOWING ACCUSED MONTANO AND DELA CRUZ TO TESTIFY FOR THE PROSECUTION DESPITE THE VEHEMENT OBJECTION OF COUNSEL FOR THE ACCUSED. CONSEQUENTLY, THE LOWER COURT ERRED IN CONVICTING ALL THE ACCUSED BASED ON THE TESTIMONIES OF MONTANO AND DELA CRUZ.

THE LOWER COURT ERRED IN NOT GIVING WEIGHT TO THE UNCONTROVERTED TESTIMONIES OF THE ACCUSED." [5]

Appellants contend that, based on the evidence of record, they could not have committed the crime charged. Art. 267 of the Revised Penal Code provides --

"ART. 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 five 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, 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 person, even if none of the circumstances above-mentioned were present in the commission of the offense. (As amended by Rep. Acts Nos. 18 (passed in 1946) and 1084, approved June 15, 1954)."

Appellants submit that none of the elements (in pars. 1, 2, 3 and 4) of Article 267, Revised Penal Code, was present in this case because: First, the alleged kidnapping did not last more than five (5) days as the records show that the incident commenced in the evening of 5 June 1986 and ended in the early morning of 9 June 1986 when the alleged rescue operation took place. Second, there was no simulation of public authority employed in the alleged kidnapping. Third, there is no record of serious physical injury inflicted on the private complainant Si Kiam Lin nor was there a threat made to kill him. And, lastly, the person allegedly kidnapped or detained is not a minor, female or public officer.

Furthermore, appellants maintain that there was no evidence adduced to establish that the alleged kidnapping was for the purpose of extorting ransom; that the testimony of Victor Uy, son-in-law of Si Kiam Lin, was merely hearsay as the alleged demand for ransom was received by the wife of the private complainant and not by Victor Uy himself.

Appellants' first assignment of error is without merit. Admittedly, the detention did not last more than five (5) days; there was no simulation of public authority; there was no recorded physical injury inflicted on Si (although a threat appears to have been made to kill him); and the victim was not a minor, female or public officer. And yet, the events which occurred from the time the victim-complainant was taken from Novaliches up to his rescue in Barangay Ligue, Bayambang Pangasinan, can hardly be viewed as a picnic or sight-seeing tour. Physical and actual detention of the victim's person was manifest in that he was handcuffed, placed inside a one-by-one square meter cubicle and later transported to a remote barrio in the north and placed under constant and continuous guard by two (2) of the accused-appellants. The victim may have been allowed free movement inside the hut where he was kept but the fact that he dared not escape as he felt he was being kept a prisoner by the accused is quite obvious from his testimony. Thus -

"Q - When you were at Brgy. Tampog, Bayambang, Pangasinan, were you bound or kept captived in a room?

A - Yes sir, I was inside the house.

Q - Were you handtied or handcuffed in Tampog?

A - In Tampog, my handcuff was removed already, sir.

x x x x x xxx

Q - You can move around freely in the house not only in the house where you were taken but also you can go

outside to answer the call of nature? If you wanted to, is it not?

WITNESS

Inside the house only sir, because they don't allow me to go outside the house.

Q - Who won't allow you to go outside the house?

A - I do not know sir, because all of them were outside the house.

Q - But you said you were not allowed to go down the house, who won't allow you to go down the house?

A - They were only two (2) there. The other one is not there.

Q - Who was not there?

A - That one sir, (witness pointing to Rodolfo Ilumen).

Q - Of the two (2) persons who were your companion at Brgy. Tampog who of them who told you not to go down the house?

A - Both of them, sir.

Q - In what way did the two (2) tell you categorically that you will not go down the house? What is their specific language?

A - They just told me that 'you just stay here inside upstairs.'"[6]

The foregoing testimony of the victim clearly shows that he was kidnapped, detained against his will, and deprived of his liberty. The fact of detention which is an essential element in the crime of kidnapping, was clearly established.

The testimony of victim's son-in-law, Victor Uy, shows that the victim was kidnapped and deprived of his liberty for the purpose of extorting ransom from his family. Thus -

"Q - While you were in your office on the aforestated address do (did) you receive any message coming outside your office?

A - Yes, sir.

Q - What is that message that you received if any?

A - That my mother-in-law called us by phone and told us together with my wife that we are going to return home immediately, sir.

Q - After you returned home what did your mother-in-law told (sic) you?

A - She told us that unidentified telephone caller says that they are going to give (get) cash money in the amount of FOUR HUNDRED THOUSAND PESOS (P400,000.00) for ransom of his father-in-law (SI KIAM LIN) and at that moment the telephone caller drop the telephone, sir.

Q - After what happen(ed) next if any?

A - That at about 12:20 o'clock in the morning of June 7, 1986 unidentified telephone caller (called) up again and I personally received the telephone call and at this juncture the telephone caller says that if his father wants to live he will give the money they are asking, sir.

Q - What did you answer to the unidentified telephone caller?

A - I told him that the banks is close during Saturday and Sunday, sir.

Q - What did the telephone caller say to you?

A - He was angry and dropped the telephone immediately, sir.

Q - What transpired next do you know if any?

A - That last June 8, 1986 at around 9:30 o'clock in the evening unidentified telephone caller called up again and I was the one who received the telephone call and he told me that if you want to hear the voice of your father you proceed to plaza fair near Sta. Cruz and there is a tape rolled at Tempo Newspaper, sir.

Q - Were you able to get the said tape rolled with Tempo Newspaper?

A - Yes, sir.

Q - What happen(ed) next do you know if any?

A - That there is again a telephone call at around 9:40 o'clock in the evening of June 8, 1986 and was received by my mother-in-law that they are going to prepare the cash money in the amount of FOUR HUNDRED THOUSAND PESOS (P400,000.00) or else they are going to kill my father- in-law sir.

Q - What did your mother-in-law say to the telephone caller?

A - She just keep silent, sir."[7] (Underscoring supplied)

The second and third errors allegedly committed by the trial court will be discussed jointly.

Appellants' contention that the court a quo erred in allowing accused-appellants Silvestre de la Cruz and Jesus Montano to testify for the prosecution despite the vehement objection of counsel for accused-appellants (except counsel for Montano and De la Cruz) and subsequently convicting all the accused on the basis of the said testimony, is likewise without merit.

Accused-appellants de la Cruz and Montano have tried to extricate themselves from the crime charged. But the records show that they attempted to escape from the police authorities (instead of coordinating or collaborating with them) when they were being arrested after a brief struggle. They now urge upon and move the Court to believe that they were actually undercover agents of the CID[8] with a mission to uncover the mastermind and other members of the kidnapping syndicate. The observations of the court below are apropos in disposing of their pretense. Thus -

"There is absolutely no doubt as to the accused Jesus Montano's and Silvestre dela Cruz' participation in the crime of kidnapping for ransom. They were readily identified by the victim Si Kiam Lin as two of the four persons who took part in abducting him in Bagong Silang and who guarded him in that isolated place from about 8:00 o'clock in the evening of June 5, 1986 to about 2:00 or 3:00 o'clock in the morning of June 6, 1986. These two accused were also his guards in the car on the way to Bayambang, Pangasinan, and in Tampog and Ligue until the victim was rescued in the early morning of June 9, 1986. They were arrested by the police in Ligue during the rescue operation. The pretensions of these two accused that they ingratiated themselves to the group of the Cuas and participated in the abduction of the victim only because as CID agents they wanted to infiltrate and expose the kidnapping 'syndicate' is not compatible with their conduct and behaviour before and during the abduction of the victim. If indeed such was their intention, they did not manifest it in spite of the many opportunities they had to abort the kidnapping or to expose the crime. They could have immediately exposed the projected kidnapping to the authorities after they were briefed of the details thereof by Victoriano Cua in the afternoon of June 4, 1986. But they did not. They and the victim were left alone in the isolated area in Bagong Silang for no less than six (6) hours on the night of June 5-6, 1986 yet they did nothing to escape

therefrom and seek refuge with the proper authorities. On the way to Bayambang, Pangasinan, a long drive from Caloocan City, with Rodolfo Ilumin during the car, they could have contrived a deception to call the attention of the authorities in any of the provinces they passed or they could have overpowered Ilumin, whom the Court observed is a relatively smaller man than them and brought him to the authorities. Again, they were left alone in Barangay Tampog and Ligue in Bayambang, for at least two (2) days but they never took steps to contact either the barangay or police authorities. They were even within a few yards of the municipal building of Bayambang, Pangasinan, on June 7, 1986 when they alighted in the Poblacion of Bayambang, when they were being transferred by Ilumin from Barangay Tampog to Barangay Ligue. This Court rejects the assertion of Montano and dela Cruz that they could not report the kidnapping to the authorities because they feared for the lives of the members of their families against whom the alleged 'syndicate' may retaliate. There is no basis for this apprehension of these accused. In the first place, there is no evidence that there is a kidnapping syndicate in Bagong Silang, Caloocan City. Secondly, if indeed these accused are members of the CID they could have sought protection for their families from their agency or the police. Thirdly, they testified for the prosecution spontaneously and voluntarily without regard to the safety of their families who were then still exposed to the members of the alleged syndicate. Fourthly, it was their duty, if they were truly members of the CID, to bring the culprits to the bar of justice. They had no business enlisting as agents of a law-enforcement agency if they lacked the courage to do their duty." [9]

To the above observations of the trial court we can only add that, quite strangely, no "CID" higher authority or any police or intelligence officer, for that matter, had testified during the trial to lend credence or substance to the pretense that Montano and de la Cruz were indeed lawful agents and involved in the kidnapping of Si pursuant to duly-issued mission orders.

Both appellants (Montano and de la Cruz) voluntarily offered themselves to be witnesses for the prosecution. Montano wrote the victim Sy Kiam Lin two (2) times (Exhs. "W" and "X-2") and, together with de la Cruz, also wrote Fiscal Romulo Resultan (Exh. "DD" and series) wherein they narrated their involvement in the kidnapping from the time it was planned during a drinking session with the other accused Rodolfo Andal up to their arrest in Barangay Ligue, Bayambang, Pangasinan. At the hearings on 3 and 10 December 1986, the prosecution presented the appellants Montano and de la Cruz as ordinary witnesses with the conformity of their counsel, Atty. Divina Cuejillo. They were not presented as state witnesses who had been discharged from the information. The court a quo, did not err in allowing both Montano and de la Cruz to testify for the prosecution, as they opted to do so.

Later, appellants De la Cruz and Montano again testified as defense witnesses. Said testimonies were basically the same as the testimonies they gave when they voluntarily testified for the prosecution. They duly established that they were participants in the crime charged. As aptly stated by the Solicitor General, "x x x, a reading of their direct testimonies for the prosecution as conducted by the public prosecutor also shows that they used the opportunity to advance the theory of their defense, i.e., that they were mere intelligence agents out to infiltrate the particular kidnapping syndicate involved." [10] In our view, the testimonies of de la Cruz and Montano served as corroborative evidence since the testimony of the victim wherein all the accused were positively identified, the testimonies of Rosie Maregmen and Patricio Maregmen positively identifying appellants Montano and de la Cruz, the testimony of Victor Uy proving the point of extortion for ransom, and the testimony of the arresting officers, all put together, definitely established beyond reasonable doubt the guilt of all the accused-appellants for the offense charged.

WHEREFORE, the judgment of the trial court appealed from is hereby AFFIRMED.

After a careful consideration of the facts as well as the recommendation of the trial court for executive clemency for appellants Jesus Montano and Silvestre de la Cruz, for their spontaneous and voluntary testimony for the prosecution, the Court is unable to make such a recommendation. It has been more than abundantly established

that they actually and actively participated in the offense charged and they should not be allowed, after their apprehension and capture, to extricate or exculpate themselves from its consequences by the expedient of voluntarily testifying for the prosecution. However, let a copy of this decision be nonetheless furnished the Honorable, the Secretary of Justice for his own evaluation on whether executive clemency would be proper for said two (2) accused-appellants.

SO ORDERED.

Quiason, Puno, and Vitug, JJ., concur.

[1] Rollo, p. 10.

* Penned by Judge Luduvico Ma. Ipac.

[2] Ibid., p. 53; Art. III, Sec. 19 (1) of the 1987 Constitution provides: ". . . Neither shall death penalty be imposed, unless, for compelling reasons involving heinous crimes, the Congress hereafter provides for it. Any death penalty already imposed shall be reduced to reclusion perpetua."

[3] TSN, 19 December 1994; Order, dated 19 December 1986, p. 249, Original Records

[4] Rollo, pp. 44-47

[5] Rollo, pp. 177-178

[6] TSN, May 15, 1987, pp. 7-8, underscoring supplied

[7] Rollo, pp. 274-276

[8] CID stands for counter intelligence division of an organization referred to by said two (2) accused-appellants as the "People's International League of the Philippines." There is no evidence on record as to the connection or relation of such organization to duly-constituted police or intelligence authorities

[9] Decision, penned by RTC Judge Ludovico Ma. Ipac, dated 11 November 1987, pp. 8-9

[10] Brief for Appellee, Rollo, p. 281

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.