

PEOPLE OF THE PHILIPPINES, APPELLEE, VS. JOVITO MANALO, APPELLANT.

G.R. Nos. 144989-90. January 31, 2003

Ponente: PANGANIBAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-nos-144989-90/>

PANGANIBAN, J.:

Each count in a series of rapes is a distinct crime that should separately be proven beyond reasonable doubt. Its elements must be established beyond moral certainty. The mere fact that the first rape incident has been established does not justify a generalized testimony on the alleged subsequent rapes.

The Case

Jovito Manalo appeals the July 25, 2000 Decision[1] of the Regional Trial Court (RTC) of Zamboanga City (Branch 13) in Criminal Case Nos. 2745(10877) and 2746(10878), finding him guilty of two counts of rape and sentencing him to reclusion perpetua for each count. The dispositive portion of the assailed Decision reads as follows:

“WHEREFORE, in view of all the foregoing, this Court finds the accused JOVITO MANALO GUILTY beyond reasonable doubt of the crime of RAPE in Criminal Case No. 2745(10877) and is hereby sentenced to suffer the penalty of RECLUSION PERPETUA, to indemnify MELODINA NUYNAY y ALIMANSA the amount of P50,000.00 and to pay the costs.

“The same accused JOVITO MANALO is also found GUILTY beyond reasonable doubt of the crime of RAPE in Criminal Case No. 2746(10878) and is likewise sentenced to suffer the penalty of RECLUSION PERPETUA, to indemnify MELODINA NUYNAY y ALIMANSA the sum of P50,000.00 and to pay the cost.” [2]

In two separate Complaints,[3] both dated January 20, 1992, appellant was accused of raping private complainant allegedly as follows:

In Criminal Case No. 2745(10877):

“That sometime in the month of November 1991, in the City of Zamboanga, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, armed with a knife, by means of force and intimidation, did then and there wil[l]fully, unlawfully and feloniously have carnal knowledge with the undersigned against her will.”[4]

In Criminal Case No: 2746(10878)

“That sometime in the month of September, 1991, in the City of Zamboanga, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, armed with a knife, by means of force and intimidation, did then and there wil[l]fully, unlawfully and feloniously have carnal knowledge with the undersigned against her will.”[5]

During his arraignment on October 2, 1998,[6] appellant, assisted by his counsel de oficio,[7] pleaded not guilty

to both charges. After trial in due course, he was found guilty of two counts of rape.

The Facts

Version of the Prosecution

The Office of the Solicitor General (OSG) narrates the factual antecedents of the case in this manner:

“Private complainant Melodina Nuynay (‘Melodina’) was a housemaid working for Poncieto Oracoy (‘Poncieto’), a member of the Philippine National Police and his wife, Marilou, a vendor who sold blankets and clothes at the market.

“Sometime in the month of September, 1991, at a time when both her employers were away at their respective work stations, Melodina was left alone at their rented room at the PC Compound in Zamboanga City to tend the four-year-old child of her employers.

“At this time, Melodina’s age could only be estimated to be around 11 years considering that her birth certificate could not be produced. Her school records indicate her date of birth as June 4, 1980 (During her testimony in open court on January 15, 1999, however, Melodina stated that she was 24 years old).

“Having lulled the child to sleep at a makeshift hammock, (‘duyan’), Melodina sat on the edge of the bed.

“Without any warning, however, appellant [being the son of the owner of the house who lived just right next door] suddenly barged inside the room, holding a knife with his right hand. Appellant pointed the knife at Melodina’s abdomen and threatened to kill her. Melodina could only [sit], frozen in fear.

“Appellant’s next movement was apt and swift. With the same hand that held the knife, he stripped Melodina of her undergarments and commanded her to lie down.

“Thereafter, appellant inserted his penis into Melodina’s vagina. The onslaught of pain surged Melodina’s being. ‘Iya akong iyut’ (He had sex with me). At this time, Melodina had known the forceful act of sexual congress.

“Once satiated, appellant left the room and repeatedly warned Melodina not to report the incident to anyone lest he [kills] her.

“By noontime, when her female employer arrived, Melodina could only stifle the pain in her vagina, as she continually performed her tasks and ran errands for her employer.

“On succeeding days, however, appellant would follow the same pattern of sexual assaults. He would wait until Melodina’s employers leave the room and, then, enter it unannounced armed with a knife, and force himself upon Melodina. Melodina remembered at least ten (10) sexual episodes.

“On November 7, 1991, however, around 4:00 p.m., Melodina was using the communal toilet when she came out running to her female employer, Marilou. She sobbed that appellant forcefully opened the door of the toilet and wanted to have sex with her. Instinctively, she dashed to the safety of her employer’s room but, in the process, was punched at the back by appellant. Melodina’s employer, Poncieto, heard the outcry.

“After having been apprised of what happened, Poncieto proceeded to confront appellant with the incident but the latter avoided Poncieto and ran away. Instead, Poncieto received a reprimand from appellant’s mother who berated him thus, ‘Nong, I told you already to sen(d) Melodina home to her relatives in San Roque but you did not obey. It is your fault.’

“Poncieto and Marilou thereafter assisted Melodina to the Zamboanga City Central Police Station to report the incident. Notably, only a complaint for attempted rape was reported and blotted at the police station.

“Two (2) days later or on November 9, 1991, Poncieto and his family, together with Melodina, transferred to another rented room within the vicinity of the PC Compound to avoid trouble. It was only during this time that Melodina revealed that she had been sexually defiled by appellant.

“Melodina was thereafter brought to Dr. Rodolfo Valmoria for physical examination. The findings were written as follows:

‘FINDINGS:

‘No visible injuries noted on the body surface.

Scanty growth of pubic hair. Labia majora, full, convex and coaptated. Labia minora light brown in color with a fleshy type hymen presenting in between. Shallow healed laceration evident at 3, 6 and 9 o’clock positions.

‘Vaginal canal is narrow and moderately admits examining index finger, cervix hard and firm. Vaginal rugosities slightly shallowed. Abdomen flat and tight with no pain o[r] palp[it]ation.

‘Breasts hemispherical in shape with brown areola and nipples, no secretions noted.

‘Vaginal smears negative for gram negative diplococci and sperm cells.

‘CONCLUSION:

‘The subject is of non-virgin state physically.’

“A preliminary investigation for rape was thereafter initiated against appellant. At this instance, the Office of the City Prosecutor of Zamboanga City found prima facie evidence to hold appellant for trial for two (2) counts of rape.”[8] (Citations omitted)

Version of the Defense

On the other hand, appellant gives his version of the facts as follows:

“Appellant declared that on November 7, 1991, at about 4:30 p.m., he had to go to the toilet to urinate. As he tried to open the door of the toilet, Melodina who was inside shouted and ran towards her employer, Poncieto Oracoy, and thereafter reported that appellant wanted to abuse her. The following day, November 8, 1991, two (2) policemen and Poncieto Oracoy came to their house and invited him to the police station. He went with them and was later informed at the police station that he was being accused of attempted rape. He was then allowed to go home after about an hour without any investigation conducted. He was never subpoenaed or called by any person from the Criminal Investigation Service (CIS) for investigation nor did he know of x x x any complaint for rape filed by Melodina against him until after he was arrested in September 16, 1998.”[9]

Ruling of the Trial Court

The RTC gave credence to private complainant’s clear, straightforward and consistent testimony. It took particular note of how appellant, who was in his forties, used his maturity in cowing into submission private complainant, who was only 11 years old at that time. It said: “The accused was in his early forties when the alleged rapes happened in 1991 x x x. From this, one can see the great disparity between the ages of the accused and the complainant and this disparity in ages further illustrates the fear which a young person would ordinarily feel against a matured person who has threatened her.”[10]

The RTC debunked the denial interposed by appellant and his claim that the Oracoys instigated private complainant to file the charges against him because they were interested in the land owned by the Manalos. The trial court gave more weight to the testimony of Poncieto Oracoy, who said that the members of his family acted

as guardians of the girl, since they had custody over her. Moreover, it held that “the Oracoys stand to gain nothing from their action of assisting the private complainant except the enmity of the Manalo couple, to whom Marilou Oracoy owes a lot, having been her foster parents.”[11]

Hence, this appeal. [12]

The Issues

Appellant submits the following assignment of errors for the consideration of this Court:

“I. The trial court erred in giving full weight and credence to the testimony of the complainant despite the existence of several circumstances which amply demonstrate that there was no rape committed.

“II. The trial court erred in finding the accused-appellant guilty beyond reasonable doubt of the crime of rape.”[13]

The Court’s Ruling

The appeal is partly meritorious.

Main Issue:

Sufficiency of the Prosecution Evidence

Appellant alleges that the court a quo gave undue credence to the victim’s testimony, which allegedly contained factual improbabilities.

He claims that he could not have used his right hand, which was the same hand holding the knife, to remove the underwear of the victim. He finds it implausible that she did not change either her outer or her undergarments until after the fifth time she had allegedly been raped. He also points out the fact that she did not offer any resistance to the alleged sexual transgression, as she herself admitted in her own testimony. Finally, he maintains that she did not provide any details on the succeeding rapes and simply said that she had repeatedly been raped ten more times.

The First Rape

Incident in September 1991

We clarify. In regard to Criminal Case No. 2746 (10878), we find that the alleged factual improbabilities in the testimony of the victim are not as improbable as appellant would want us to believe. While it may have been difficult to remove her underwear with the hand wielding a knife, it was certainly not a physical impossibility. The fingers of the hand retain a certain degree of mobility sufficient to pull down another person’s underwear even when a knife is placed in its grasp.

Further, the fact that the victim failed to change her clothes and panties for several days after the first rape incident is not a far-fetched reality. In fact, it bolsters her claim of rape. After the initial sexual assault, she could have been so severely traumatized that she no longer cared about her physical appearance or personal hygiene.

In any event, the factual questions raised by appellant pertain only to inconsequential matters that do not bear upon the elements of the crime. Indeed, what is decisive in a prosecution for rape is whether the commission of the crime has been sufficiently proven. Inconsistencies and discrepancies on minor details that are irrelevant to the constitutive elements of the crime cannot be considered grounds for acquittal.[14] In *People v. Perez*,[15] this Court declared, thus:

“x x x. For a discrepancy to serve as basis for acquittal, such must refer to significant facts vital to the guilt or

innocence of the accused. An inconsistency, which has nothing to do with the elements of the crime, cannot be a ground to reverse a conviction. Moreover, even the most candid witnesses oftentimes make mistakes or variations in their declarations, considering the treachery of human memory. x x x”[16]

Appellant avers that the victim herself testified that she had not put up any resistance when the sexual transgression was being committed against her. She can hardly be faulted for behaving as she did, because the reaction to such intimidation varies from one person to another.

The records of the case reveal that appellant forced himself on the victim by pointing a knife at her and threatening to kill her. Verily, any attempt on her part to resist his lecherous design would have been futile and unthinkable under such a circumstance. Indeed, threatening a woman with a knife would be sufficient to cow her into submission.[17]

Intimidation is directed at the mind of the victim. Being subjective, its presence cannot be tested by any hard and fast rule. It should instead be viewed in the light of the victim’s perception and judgment at the time of the commission of the crime.[18] What is vital is that it is sufficient to consummate the purpose the accused has in mind.[19] That the threat produces reasonable fear that it would be carried out if the victim resists the lust of the accused is enough.[20]

This Court has repeatedly held that rape is committed when intimidation is used on the victim and the latter submits against her will out of fear for her life or personal safety.[21] In *People v. Sagun*,[22] the Court gave an explicit ratiocination of this jurisprudential principle as follows:

“x x x [T]hough a man lays no hand on a woman, yet if by an array of physical forces, he so overpowers her mind that she does not resist, or she ceases resistance through fear of greater harm, the consummation of the sexual act is recognized in jurisprudence as rape. Physical resistance need not be established in rape, when intimidation is exercised upon the victim and the latter submits herself, against her will, to the rapist’s embrace because of fear for life and personal safety.”[23]

It would be unreasonable, therefore, to expect the victim to act with equanimity and to have the courage and the intelligence to disregard the threat made by the accused.[24] When a rape victim is paralyzed with fear, she cannot be expected to think and act coherently. Her failure to immediately take advantage of an opportunity to escape does not automatically vitiate the credibility of her account.[25]

Furthermore, appellant cannot seek exculpation simply because the victim did not report the rape incident right away. It is not uncommon for young girls to conceal for some time the assault against their virtue because of the threats on their lives.[26] To be sure, there is no standard human reaction to an experience that may be so traumatic as to make a victim suffer the onslaught on her honor in silence, rather than reveal her story.[27]

In a prosecution for rape, the evaluation of the evidence presented during the trial ultimately revolves around the credibility of the complaining witness.[28] And when credibility is in issue, it is well-settled that this Court generally defers to the findings of the trial court. Having heard the witnesses themselves and observed their deportment during trial, it was in a better position to decide the question.[29]

In this case, appellant has not shown any material discrepancy in the testimony of the victim that would seriously taint her credibility and warrant a reversal of the trial court’s factual findings. Undeniably, the accused may be convicted on the basis of the lone testimony of the rape victim, provided that her testimony is clear, credible, convincing, and otherwise consistent with human nature and the normal course of things.[30] Thus, when her testimony is straightforward and unflawed by any material or significant inconsistency, it deserves full faith and credence and cannot simply be discarded.[31]

Indubitably, the fact of rape and the identity of appellant as the perpetrator were sufficiently established by the prosecution based on the clear, coherent and candid narration by the victim of the sexual abuse she suffered in his hands sometime in September 1991. A perusal of her testimony readily reveals that he was able to have sexual intercourse with her against her will by employing force and intimidation. She recounted her harrowing experience as follows:

“Q

Now, in the month of September 1991, do you remember whether there was any untoward incident that happened involving you?

A

I could remember, sir.

Q

That incident when it happened in the morning or in the afternoon?

A

It was in the morning.

Q

Where were you when that incident happened?

A

I was in the house[.] I was in the room of the house.

Q

Whose house?

A

In the house of Pilar Manalo.

Q

The house where you and your employer were staying?

A

Yes, because they are renting that house.

Q

Now, what were you doing inside that room?

A

I was making the child x x x sleep.

Q

And where were your employer[s]? Mr. and Mrs. Oracoy at that time when you were making the child sleep inside the room.

A

My employer Poncieto Oracoy was in his office and Marilou was selling blankets and clothes at the market.

Q

While inside that room, what happened?

A

When I made the child sleep, we were inside the room.

Q

Who went there inside the room?

A

Jovito Manalo.

Q

Now, when Jovito Manalo went inside the room, what did he do?

A

He told me that if I will report the incident to my employer, he is going to kill me.

Q

With what is he going to kill you?

A

With a knife.

Q

Where was the knife?

A

It was pointed on my stomach.

Q

Who was holding the knife, if any?

A

Jovito Manalo, sir.

Q

Then when he pointed the knife at your stomach, and told you that if you are going to tell your employer x x x he will kill you, what did he tell you after that?

A

He told me not to report the incident because he is going to kill me.

Q

Then what did he do with you inside that room?

A

Then he undressed me and removed my panty and told me to lie down.

Q

Did you comply? [T]o lie down.

A

Yes, sir.

Q

Why?

A

Because he told me to lie down with his knife pointing at me.

Q

Where was the knife pointed at you? In what part of your body?

A

Here, sir.

Interpreter:

Witness pointing to the left abdomen.

Q

Now, was he able to remove your panty?

A

Yes, sir.

Q

Then, after he removed your panty, what did he do?

A

He abused me.

Q

How did he abuse you?

A

He abused me and if I will report, he is going to kill me.

Q

When you said abused, what do you mean?

A

He had sex with me.

Q

How did he have sex with you? Can you describe?

A

He made me lie down x x x to remove my panty.

Q

And then?

COURT (to the witness):

You tell the truth, considering that this is a serious case. So you have to speak the truth. (In Visayan dialect, considering that witness is quite shy to testify.)

Witness:

A

He took out my panty.

ACP ELUMBA:

Q

What did you feel when he abused you?

A

It was painful.

Q

Where? Where was the pain?

A

Here, sir.

Interpreter:

Witness pointing to her stomach.

COURT:

Q

Where is the pain? You talk. In the stomach or in the vagina or in the anus? Where?

A

In my vagina, your Honor.

ACP ELUMBA:

Q

Why was it painful? Why was it painful in your vagina?

A

He had sex with me. '[I]ya akong iyut.'

Q

You mentioned the word 'iyut' or sex. Do you know what this word 'iyut' means?

COURT:

Q

What was inserted in the vagina?

A

His penis, Your Honor.

ACP ELUMBA:

Q

Was that the reason why you felt pain in the vagina?

A

Yes, sir.

Q

Was he able to insert his penis?

A

Yes, sir.

Q

About how many times on that morning he inserted his penis on your vagina?

A

Only once, sir.

Q

Then after that, what did he do?

A

He requested me not to report and if I will report to my employer, he will kill me.

Q

After that, after he inserted his penis, what did he do?

A

Not to report because he is going to kill me.

Q

And then after telling that to you, what did you do?

A

Then he went out; he left the room.”[32]

**The Second Rape Incident
in November 21, 1991**

However, as to the rape allegedly committed sometime in November 1991, as charged in Criminal Case No. 2745(10877), we find the prosecution evidence insufficient to warrant a conviction. In finding appellant guilty of the second rape charge, the trial court merely relied on the victim’s broad and general statements, which were bereft of any material particulars that would establish the commission of the rape beyond reasonable doubt. Unlike the detailed testimony on the first rape committed in September 1991, the narration of the alleged succeeding rapes, including the alleged rape in November 1991, was bereft of the essentials that comprise the component elements of the crime. This fact is evident from the victim’s curt testimony:

“Q

After that incident, was there any other incident that happened, similar incident?

A

There was, sir.

Q

How many times?

A

Ten times in September 1991.

Q

When was the last time then you were abused by Jovito Manalo?

A

It was November 4 (four).

Q

From September to November, you said the abuses were repeated for ten times. Where were you abused or where was the [abuse] committed?

A

It is inside the room x x x [every time] my employer is not there because he used to watch if my employer goes out and then he brings with him a knife when he goes there to me.

Q

And when you said you were repeatedly abused, you mean to say what he did the first time was the same thing he did subsequently for ten times?

A

Yes, sir.

Q

Now, in all those times up to November 4, did you tell anybody else about what Jovito Manalo did to you?

A

I did not yet report because I was afraid he might kill me.

Q

In all those times you said you were abused, did you like what Jovito Manalo [did] to you?

A

I did not like.”[33]

To be sure, each count in a series of rape incidents is a distinct crime, which should separately be proven beyond reasonable doubt. The rather generalized statement of the victim that she was raped repeatedly after the first incident in September 1991 is clearly inadequate and insufficient to establish the guilt of the accused as far as these other rape charges are concerned.[34] Such statement was a mere conclusion, not a narration of constitutive facts.

Proper Penalty

Pursuant to Article 335[35] of the Revised Penal Code, which was the applicable law at the time the crime occurred, when rape is committed with the use of a deadly weapon, the penalty shall be reclusion perpetua to death.

In the instant case, the crime was committed with the use of a knife. In the absence of any proven aggravating circumstance, the RTC did not err in meting out reclusion perpetua to appellant. However, it should have further ordered him to pay P50,000 as moral damages. Moral damages are automatically granted in a rape case without need of further proof other than the fact of its commission. It is assumed that a rape victim has actually suffered moral injuries entitling her to such an award. However, consistent with current jurisprudence,[36] exemplary damages cannot be granted inasmuch as no aggravating circumstance was alleged in the information or proven during trial.

WHEREFORE, the appealed Decision of the Regional Trial Court of Zamboanga City, Rizal (Branch 13) in Criminal Case No. 2746(10878) is AFFIRMED, with the MODIFICATION that appellant shall pay the victim P50,000 as moral damages in addition to the indemnity ex delicto granted by the lower court. Appellant is ACQUITTED in Criminal Case No. 2745(10877) on reasonable doubt. No costs.

SO ORDERED.

Puno, (Chairman), Sandoval-Gutierrez, Corona, and Carpio-Morales, JJ., concur.

[1] Penned by Judge Carlito A. Eisma.

[2] Assailed Decision, pp. 15-16; rollo, pp. 31-32; records, Vol. I, pp. 78-79.

[3] Subscribed and sworn to before 3rd Assistant City Prosecutor Bienvenido P. Orillo, certified by 2[nd] Assistant City Prosecutor Abdulmaid K. Muin and approved by City Prosecutor Manuel P. Tatel.

- [4] Records, Vol. I, p. 1.
- [5] Records, Vol. II, p. 1.
- [6] Order dated October 2, 1998; records Vol. I, p. 25.
- [7] Atty. Remedios M. Cañete of the Public Attorney's Office (PAO).
- [8] Appellee's Brief, pp. 5-11; rollo, pp. 84-90; signed by Assistant Solicitor General Carlos N. Ortega, Assistant Solicitor General Roman G. del Rosario and Solicitor Ma. Theresa Dolores C. Gomez-Estoesta.
- [9] Appellant's Brief, pp. 4-5; rollo, pp. 46-47. This was signed by Atty. Conrad K. Tan of the Cesar M. Jimenez Law Office.
- [10] Assailed Decision, p. 14; rollo, p. 30.
- [11] Id., pp. 15 & 31.
- [12] This case was deemed submitted for resolution on July 20, 2001, upon receipt by this Court of appellee's Brief. Appellant's Brief was received by this Court on August 26, 2001. The filing of a Reply Brief was deemed waived, as none had been submitted within the reglementary period.
- [13] Appellant's Brief, p. 5; rollo, p. 47; original in upper case.
- [14] People v. Bares, 355 SCRA 435, March 27, 2001.
- [15] 353 SCRA 609, March 5, 2001.
- [16] Id., p. 616, per Quisumbing, J.
- [17] People v. Castillo, 335 SCRA 100, July 5, 2000; People v. Alquizalas, 305 SCRA 367, March 25, 1999.
- [18] People v. Nogar, 341 SCRA 206, September 27, 2000; People v. Sultan, 331 SCRA 216, April 27, 2000; People v. Abalde, 329 SCRA 418, March 31, 2000.
- [19] People v. Lozano, GR No. 126149, December 7, 2001.
- [20] People v. Lim, 312 SCRA 550, August 17, 1999.
- [21] People v. Barcelona, 325 SCRA 168, February 9, 2000.
- [22] 303 SCRA 382, February 19, 1999.
- [23] Id., p. 395, per Quisumbing, J.
- [24] People v. Alfanta, 320 SCRA 357, December 9, 1999.
- [25] People v. Balora, 332 SCRA 403, May 31, 2000.
- [26] People v. Balmoria, 344 SCRA 723, November 15, 2000.
- [27] People v. Lucban, 322 SCRA 313, January 19, 2000.
- [28] People v. Pagpaguitan, 315 SCRA 226, September 27, 1999.
- [29] People v. Navida, 346 SCRA 821, December 4, 2000; People v. Glabo, GR No. 129248, December 7, 2001.
- [30] People v. Burgos, GR Nos. 139959-60, November 22, 2001; People v. Sale, 345 SCRA 490, November 22, 2000; People v. Alicante, 332 SCRA 440, May 31, 2000.

[31] *People v. Penaso*, 326 SCRA 311, February 23, 2000.

[32] TSN, January 13, 1999, pp. 7-12.

[33] TSN, January 13, 1999, pp. 13-14.

[34] *People v. De Leon*, 319 SCRA 743, December 3, 1999.

[35] “Art. 335. When and how rape committed. -- Rape is committed by having carnal knowledge of a woman under any of the following circumstances

- By using force or intimidation;
- When the woman is deprived of reason or otherwise unconscious; and
- When the woman is under twelve years of age, even though neither of the circumstances mentioned in the two next preceding paragraphs shall be present.

The crime of rape shall be punished by reclusion perpetua.

Whenever the crime of rape is committed with the use of deadly weapon or by two or more persons, the penalty shall be reclusion perpetua to death.

When by reason or on the occasion of the rape, the victim has become insane, the penalty shall be death.

When the rape is attempted or frustrated and a homicide is committed by reason or on the occasion thereof, the penalty shall be likewise death.

When by reason or on the occasion of the rape, a homicide is committed, the penalty shall be death.”

[36] *People v. Balas*, GR Nos. 138838, December 11, 2001; *People v. Ariola*, GR Nos. 142602-05, October 3, 2001.

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.