PEOPLE OF THE PHILIPPINES, PLAINTIFF-APPELLEE, VS. JAIME TUMARU AND ALEX MAUN, ACCUSED-APPELLANTS.

G.R. Nos. 95751-52. December 02, 1999

Ponente: PURISIMA, J.

Read online (full-text search, related cases, audio case brief): https://batas.org/library/g-r-nos-95751-52/

PURISIMA, J.:

Appeal interposed by Jaime Tumaru and Alex Maun from the Decision of Branch 26 of the Regional Trial Court in Luna, Kalinga-Apayao, finding them guilty of murder in Criminal Case Nos. 15-88 and 16-88 for the killing of Atty. Eduardo Madrid and Santiago Umoso, and sentencing them accordingly.

Filed on September 13, 1988 by 1st Assistant Provincial Fiscal Godofredo G. Guerrero, the Informations indicting appellants Jaime Tumaru and Alex Maun, allege:

> In CRIMINAL CASE NO. 15-88
>
> "That on or about the afternoon of May 24, 1987 at Malubibit, Flora, Kalinga-Apayao and within the jurisdiction of this Honorable Court, the above-named accused armed with guns, conspiring, confederating and mutually aiding one another with the attendance of treachery and evident premeditation, did then and there willfully, unlawfully and feloniously attack, assault and shot one EDUARDO MADRID y FERNANDEZ, inflicting upon the latter gun shot wounds thereby causing the direct and immediate death of said EDUARDO MADRID.
>
> That the offense is further attended with the aggravating circumstance of ignominy.
>
> CONTRARY TO LAW."[1]
>
> In CRIMINAL CASE NO. 16-88
>
> "That on or about the afternoon of May 24, 1987 at Malubibit, Flora, Kalinga- Apayao and within the jurisdiction of this Honorable Court, the above named accused armed with guns, conspiring, confederating and mutually aiding one another with the attendance of treachery and evident premeditation, did then and there willfully, unlawfully and feloniously attack, assault and shot SANTIAGO UMOSO inflicting upon the latter gun shot wounds thereby causing the direct and immediate death of said SANTIAGO UMOSO.
>
> CONTRARY TO LAW."[2]

With the appellants entering negative pleas on November 29, 1988, upon arraignment with the assistance of Atty. Delfin Taala, as counsel de parte, joint trial ensued with the prosecution presenting Lorenzo Miguel, Zenaida Madrid, Dr. Ferdinand Nicolas, Jose Limmayog, Francisco Balanban, Sergio Sabbun, Froilan Taberna, Marcelo Lawat, Francisco Balanban, Nestor Ortega, Roy Umoso, Warlito Montanez, Villamor Caluya, and Disederio Mamba, as its witnesses.

For the defense, Florante Bariuan and appellants Jaime Tumaru and Alex Maun took the witness stand.

For the prosecution, Lorenzo Miguel and its other witnesses testified as follows:

Lorenzo Miguel is a native of Barangay 42, Apaya, Laoag City but he spent his summer vacation in his brother Moises' house in Ginto, Flora, Kalinga-Apayao.

On May 24, 1987, he (Lorenzo Miguel) together with his brother and two others were pasturing their carabaos in Papagan, Flora, Kalinga-Apayao. They later brought the carabaos to the river for a bath.

While his companions were still at the river and he was alone pasturing the carabaos in the riceland of Moises, a man sitting on the branch of a tree whistled and signaled him (Lorenzo Miguel) to go away by waving his left hand forward and backward. He did not accede and simply ignored such signal because he thought the man was his brother when, in fact, Moises was still at the river. He did not know the man. It was only during the trial that he came to know him to be Alex Maun. The place is a second growth forest and the tree is forty (40) meters away from the spot where he stood.

Meanwhile, two (2) persons riding on a motorcycle arrived. The driver was Municipal Councilor Santiago Umoso while the other on board was OIC Mayor Eduardo Madrid. Thereafter, he (Lorenzo Miguel) heard a gun rapport coming from the long gun of the man sitting on the branch of the tree. Atty. Madrid fell from the motorcycle. He got down from the carabao but remained in the place. Another person, later identified as Jaime Tumaru, who was at the foot of the tree, fired a short gun at Umoso. Lorenzo knew that Papagan is a critical area, having heard about it from his brother and friends.

Maun was wearing a sleeveless white T-shirt and maong long pants while Tumaru wore a T-shirt with short sleeves and blue stripes and short maong pants. The motorcycle fell together with Umoso. Frightened, Lorenzo ran to his brother's house but he did not report the incident to the police or the authorities.

On May 25, 1987, Lorenzo left for Laoag together with his father because his brother Moises told the father about what he (Lorenzo) witnessed.

Under cross–examination on May 29, 1989, Lorenzo testified that he was living with Mrs. Zenaida Madrid, widow of Atty. Madrid, in Tondo, Manila, since December 17, 1988. She was supporting him and even promised to send him to school. The police investigated him four times, once in Quezon City, in Tuguegarao, in Laoag City and at the office of JAGO on June 8, July 1,6 and 30, 1987, respectively.

Mrs. Madrid sent a letter-request to the Chief of the Narcotics Section of the National Bureau of Investigation (NBI) and on July 30, 1987, the latter referred the matter to NBI Agents Jose Limmayog and Francisco Balanban, who conferred with Cpl. Marcelo Lawat. The latter furnished them with copies of the sworn statements of Lorenzo Miguel, Moises Miguel and Eduardo Galvez. Lorenzo, in the presence of Mrs. Madrid, Cpl. Lawat, Atty. Laygo, Atty. Francisco Balonbon, Jr. and NBI Agent Danny Reyes, picked up the pictures of Jaime Tumaru and Alex Maun and identified them as the perpetrators of the crime.

Capt. Espia, Asst. Investigator Sergio Sabbun and Pat. Froilan Taberna, all from INP, Flora, Kalinga-Apayao, conducted the initial investigation. According to them, there was no danger in Flora except for the goons of former Mayor de San Jose. Attys. Laygo and Balonbon, together with Cpl. Lawat and Agent Reyes, proceeded to Camp Adduru in Tuguegarao where Capt. Espia produced the bodies of Tumaru and Maun. In two sets of line-up, Lorenzo Miguel identified the culprits as Alex Maun and Jaime Tumaru. Pictures were taken while the boy was identifying Maun and Tumaru. They came to know later that Atty. Madrid and Mayor de San Jose were political enemies.

Upon the order of Station Commander Roque Visitacion, Sabbun finalized the sketch dictated by Pat. Taberna, son-in-law of the deceased Umoso. Pat. Taberna was in the cockpit arena when C1Cs Conyado and Datugan, the latter being the security guard of Atty. Madrid, reported to him the incident. Together with Cesar Adsay and

Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

Lorenzo Magpale he went to the crime scene to recover the bodies of Atty. Madrid and Santiago Umoso. They saw Santiago Umoso lying on the ground face down with several gunshot wounds and clotted blood coming out from his mouth, between the junction going to Malubibit Norte and Sta. Maria, Flora, Kalinga-Apayao. They found the body of Atty. Madrid in the upper part of the mountain, left side of the road proceeding to the Poblacion of Flora, Kalinga-Apayao. There were gunshot wounds and Atty. Madrid's head was completely severed from the body. They were not able to recover his head. They also saw the motorcycle, and brought the cadaver of Atty. Madrid to the Poblacion on board his service car.

Dr. Ferdinand Nicolas, in his capacity as resident physician of Flora District Hospital, conducted an autopsy on the cadavers of Atty. Madrid and Santiago Umoso and submitted the following necropsy report:

> "May 26, 1987
>
> Autopsy report on the body of Atty. Eduardo Madrid, 47 years old, male, married, Filipino, Catholic, and presently residing at Poblacion West, Flora, Kalinga-Apayao.
> Name of incident-Gunshot wound
> Day of Incident-May 24, 1987
> Time of Incident-3:30 P.M.
> Place of Incident-Sitio Papagan, Barangay Tamalunog, Flora, Kalinga-Apayao.
>
> Findings:
>
> 1. Complete avulsion of head and neck at level cervical vertebra #2 neck stump is corrugated with protruding ships of the bone.
> 2. Incised wound at about 1.5 cm., entrance at the middle 3rd of clavicle anterior chest wall, right, penetrating with exit at the back near the tip of the scapula.
> 3. Gunshot wound with smudging entrance left, enterior chest wall at the area of the clavicle, middle 3rd measuring at about 1.5 x 1 cm. directed downward penetrating, perforating (?), with underlying complete fracture of the clavicle, and
> 4. Multiple semi-lenear abrasion with contusion, (sic) anterior chest wall;
> a) Lateral aspect of sternum, right #4 measuring at about 2.5 x 2 cm.
> b) Lateral aspect of sterum, left #3 measuring about 2 x 2 cm. each.
>
> Cause of death: Cardiopulmonary arrest secondary to shock, secondary to hemorrhage.[3]
>
> The findings on the body of Santiago Umoso were:
> 1. Gunshot wound at the head with wound entrance at the left nostril with laceration at about .5 cm directed upward and forward with exit at occipitoparietal region measuring about 12 by 10 cm with underlying traumatised (sic) brain tissue.
>
> 2. Gunshot wound lateral aspect right anterior chest wall, level of third rib measuring about 1.3 x 1 cm with smudging directed downward, penetrating, perforating with exit at left lumbar region measuring about 1x 1 cm."[4]

Mrs. Madrid, together with her mother-in-law and sister-in-law, were in their house in the Poblacion, Flora, Kalinga-Apayao, when one Mr. Aguda informed them of the incident. She looked for their drivers in order to confirm what happened but they left upon knowing of the ambush. It was already 5:00 o'clock in the afternoon when the military and the bodyguards brought Atty. Madrid's remains to their house. He was beheaded. His body was embalmed and he lay in state for fifteen (15) days at Funeraria Baquiran in Aguilar, Pangasinan, for security reasons. She spent Sixty Thousand (P60,000.00) Pesos during the six-day wake at Funeraria Carbonel, Flora, Kalinga-Apayao. She also spent for the bringing of the body of her husband to Kalinga-Apayao; Six Thousand (P6,000.00) Pesos for the funeral car; One Thousand (P1,000.00) Pesos for gasoline, and Six Thousand

(P6,000.00) Pesos for the tomb. She lost everything when her husband died because he (Atty. Madrid) was the breadwinner.

Mrs. Madrid narrated that her husband was involved in an altercation with Mayor de San Jose. There was a case against Alex Maun for which her husband acted as counsel for the complainants, regarding the killing of Cacaho. Maun wanted to settle the case amicably for the sum of Twenty Thousand (P20,000.00) Pesos. But the heirs of the victims would accede only to a settlement in the amount of Thirty Seven Thousand (P37,000.00) Pesos. The heirs of the victims were forced to consent for fear that they would be the next victims.

Roy Umoso, son of the deceased Santiago Umoso, borrowed the motorcycle owned by Clemente Ortega from the latter's son, Nestor Ortega, at 1:00 o'clock in the afternoon of May 24, 1987, upon the order of his father and Atty. Madrid. They used the motorcycle to go to Malubibit Norte. At 4:00 o'clock in the afternoon, he learned from his mother that his father was ambushed. They went to the crime scene and saw his father lying dead. His father's wallet was missing. Nestor Ortega found out that the motorcycle was not in good running condition upon its return. It was loaded on the truck owned by Atty. Madrid.

Warlito Montanes personally knew the accused in these cases. Before the incident, Jaime Tumaru was the Detachment Commander of Flora, Kalinga-Apayao. Jaime Tumaru, Alex Maun, Rolando Maddela and PC Soldier Adbucol Jainal went to his house near the cockpit arena at 3:00 o'clock in the afternoon of May 24, 1987. They brought beer and each of them drank one beer. Jaime Tumaru went to the market thereafter to buy meat for his family, while Alex Maun and Rolando Madella went to the latter's house to attend the birthday party of Madella's son. He (Montanes) went to the cockpit arena. Police Ernesto Pascua asked him to give his sworn statement, which was subscribed before Judge Martha Dugayon.

Villamor Caluya, OIC Municipal Councilor, and Sergio Putulan, Municipal Secretary, used Atty. Madrid's minibus in going to Flora to prepare for the fiesta. They solicited trophies from Mayor Versola and Atty. Barroga for the basketball games. They sought permission from Judge Aquilizan if Atty. Madrid's visitors can use the judge's house. Disederio Mamba, member of INP-Flora, rode on the same minibus in Ayaga, Abulug, Cagayan. They saw Tumaru and Maun unarmed while riding on a motorcycle at Sipa, Sta. Marcela, Kalinga-Apayao, at 2:30 o'clock in the afternoon. Caluya and Putulan returned to Atty. Madrid's house. However, his (Atty. Madrid's) wife informed them that Atty. Madrid was in the cockpit arena, so they proceeded to the place. They met Maun and Tumaru in the cockpit arena. Someone told them that the Mayor went to Malubibit Norte. They tried to wait for them in the cockpit arena but they later learned that they were ambushed. Mamba went to the Municipal Building to verify the incident when he met Tumaru at the crossing. Tumaru did not react when told that Atty. Madrid had been ambushed. Tumaru neither spoke a word. Mamba went home to inform his family that he had arrived from Luna, Kalinga-Apayao. He went back to the Municipal Building and went to the house of Umoso but his body had not arrived yet. Then, he passed by the group of Tumaru in the house of Rolando Maddela. He even joined the group in drinking. He went home because it was getting late.

Appellants Jaime Tumaru and Alex Maun relied on denial and alibi for their defense.

Tumaru and Maun executed sworn statements vehemently denying their participation in the murder. They claimed that the NPAs were responsible for the killing. The statements were marked as Exhibits "J," "J-1," "J-2," "J-3" and Exhibits "K," "K-1," "K-2," respectively. They theorized that they left Luna on May 24, 1987, at 2:00 o'clock in the afternoon, for Flora, Kalinga-Apayao for an important mission. Upon the verbal order of their commanding officer, Lt. Agbayani, they conducted an intelligence mission regarding the National People's Army's (NPA) activities. They took a Yamaha motor.

Gilberto Estomo also informed Maun through radio to go to Flora in order to settle the double murder charge

Turn this case into an audio lecture - facts, issues, ruling and doctrine - at batas.org

against him for killing the ward of Tony and Juliana Cacacho pending before the Fiscal's Office in 114th PC in Bulanao, Tabuk, Kalinga-Apayao. They arrived in Flora at 3:00 o'clock in the afternoon and went directly to the cockpit arena. He met Rolando Maddela in the cockpit arena and they went to Warlito Montanez' house and drank one beer each together with Maun. Tumaru went to the market while Maun and Rolando Maddela went to the latter's house for the birthday party of Maddela's son. They stayed there for three (3) hours. They went to the house of Santiago Umoso and played pusoy during the wake that night and went home. Tumaru knew that his wife was not in the boarding house in Flora because she, together with their two-month old child took their vacation in Sanchez Mira a week before the fateful incident. Tumaru went to the public market in order to buy meat and looked for Maun in the house of Maddela. They had lunch In Maddela's house and left Flora the following day, at 7:00 o'clock in the morning, and reported at Luna headquarters.

Florante Barioan testified on the conduct of the lineup and the matter of identification by Lorenzo Miguel of the culprits. Maun claimed that during the line-up, Captain Espia said that one Mr. Bariwan was not the culprit but rather guided Lorenzo Miguel to point at him as the culprit. He did not file a case against Captain Espia for the said violation of his right. He was the personal security guard of Mayor de San Jose for seven months.

On September 26, 1990, the Regional Trial Court a quo found the evidence for the prosecution enough to convict and rendered judgment disposing thus:

> "WHEREFORE, in Criminal Case No. 15-88, the two accused Jaime Tumaru and Alex Maun are hereby sentenced each to suffer an imprisonment of Reclusion Perpetua. The two accused are also ordered to jointly and severally indemnify the heirs of the deceased OIC Eduardo F. Madrid the sum of THIRTY THOUSAND PESOS (P30,000.00) for indemnity; the sum of SIX THOUSAND PESOS (P6,000.00) for the hire of the funeral car; the sum of ONE THOUSAND PESOS (P1,000.00) for the gasoline; the sum of SIX THOUSAND PESOS (P6,000.00) for the tomb; and the sum of FIFTEEN THOUSAND PESOS (P15,000.00) for the expenses incurred during the wake which lasted for fifteen (15) days in Pangasinan and six (6) days in Flora, Kalinga-Apayao.
>
> With respect to Criminal Case No. 16-88, the accused Jaime Tumaru and Alex Maun are also hereby sentenced each to suffer an imprisonment of Reclusion Perpetua and to indemnify the heirs of the victim in the sum of THIRTY THOUSAND PESOS (P30,000.00) and to pay the costs.
>
> SO ORDERED."[5]

Undaunted, appellants found their way to this Court via the appeal at bar, theorizing that:

> I
> THE TRIAL JUDGE SERIOUSLY ERRED IN FINDING THE ACCUSED GUILTY OF THE CRIME CHARGED DESPITE THE ABSENCE OF EVIDENCE SUPPORTING THE SAME.
>
> II
> THE TRIAL JUDGE GRAVELY ERRED IN BLINDLY BELIEVING THE TESTIMONY OF LORENZO MIGUEL NOT WITHSTANDING THE FACT THAT HE WAS NOT THE ONE WHO HEARD HIS TESTIMONY AND THE PRESENCE OF EVIDENCE SHOWING THE BIAS CHARACTER OF THE WITNESS, THE IMPROBABILITY OF HIS TESTIMONY IN THE LIGHT OF THE EVIDENCE ADDUCED SHOWING THE CONTRARY.
>
> III
> THE TRIAL JUDGE SERIOUSLY ERRED IN RELYING ON THE WEAKNESS OF THE EVIDENCE OF THE DEFENSE TO CONVINCE HIM THAT THEY ARE GULTY OF THE CRIME CHARGED.
>
> IV

Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

> THE TRIAL JUDGE SERRIOUSLY ERRED IN IMPUTING MOTIVE ON THE PART OF THE ACCUSED ON THE BASIS OF THE MATTERS NOT ESTABLISHED BY EVIDENCE.[6]

Was it proper for the trial court to base its judgment solely on the testimony of the lone witness? May a judge render judgment in the case entirely heard by another Judge? Was the trial court correct in imputing motive on the part of the accused and did the trial court err in not upholding the defenses of denial and alibi? These are the pivotal issues for resolution in these consolidated cases.

Appellants question the credibility of witness Lorenzo Miguel, branding him as a bias witness because for sometime he was under the care of the victim's family.

Records show that the abovenamed witness was living in Mrs. Zenaida Madrid's house in Tondo when he was called to testify in the case. The murder complained of happened on May 24, 1987, more than one and a half years before subject witness started to stay in the residence of Mrs. Madrid. On July 6, 1987 or barely one and a half months after the commission of the crime sued upon, the said witness gave a sworn statement. As stressed upon by the Solicitor General, it was but natural for the bereaved family to be concerned with the safety of their lone witness in order to vindicate the wrong done against them. They simply wanted to protect the life of their eyewitness from any risk. Such concern for his safety did not make the said eyewitness bias and unreliable.

Anent the submission of appellants that there was delay in the presentation of subject lone witness, the Court succinctly held in People v. Untalasco, Jr., 125 SCRA 159, 170:

> xxx xxx xxx
> "xxx As stated in People v. Munoz (107 SCRA 313) and People v. Delfin (2 SCRA 911) the initial reluctance of witnesses to volunteer information about a criminal case and their unwillingness to be involved in criminal investigations is common and has been declared as not affecting their credibility."

Records disclose that the father of Lorenzo Miguel brought him to Laoag City, as what he witnessed was not an ordinary case but a gruesome murder. The parental instinct of protecting his son of tender age is understandable. While it is true that forty-five (45) days had elapsed from the time of commission of the crime when the sworn statements were made, the said period was not used to concoct a story.

The presence of powder burns in the bodies of the victims which allegedly belie the testimony of the witnesses that the victims were shot at a distance of about ten to fifteen meters from the assailants, did not make the testimonial evidence for the prosecution incredible.

The medico legal officer opined that the muzzle of the gun might have been inserted into the nostril of Umoso, when the latter was shot. In the case of the gunshot wound in the body of Atty. Eduardo F. Madrid, the same medico legal officer theorized that the victim could have been in a siting position, with the assailant standing, when he shot the said victim at point blank range.

> "We have repeatedly held that the testimony of minors of tender age will suffice to convict a person accused of a crime as long as it is credible. Jimmy, then 12-years old, delivered a straightforward, unshaken and convincing narrative. Indeed, the testimony of minor children of sound mind is likely to be more correct and truthful than of older persons, so that once established that they have fully understood the character and nature of an oath, their testimony should be given full credence." (Marco v. Court of Appeals, 273 SCRA 276, 283, citing People v. Rodico, 249 SCRA 309 and People v. Vitor, 245 SCRA 392)

It is not necessary that the judge who heard the case be the same judge to pen the decision. The judge trying the case may die, resign, be disabled, or transferred to another court while the case was ripening for decision, and before he could decide it. In such an eventuality, another judge has to continue and finish the trial. Anyway, the

succeeding judge can examine and evaluate the evidence already presented by the simple expedient of going over the transcripts of the testimonies of witnesses, in the same manner as appellate courts review evidence on record.

> "xxx the fact that the judge who heard the evidence is not himself the one who prepared, signed and promulgated the decision constitutes no compelling reason to jettison his findings and conclusions, and does not per se render his decision void. xxx" (People v. Espanola, 271 SCRA 689, 716)

With respect to the defense of alibi, this court has consistently ruled:

> "xxx Well-entrenched is the doctrine that for alibi to prosper, the defendant must prove not only (1) that he was somewhere else when the crime was committed but (2) it must likewise be demonstrated that he was so far away that he could not have been physically present at the place of the crime or its immediate vicinity at the time of its commission. xxx" (People v. Baniel, 275 SCRA 472, 483 citing, People v. Camat, 256 SCRA 52; People v. Alapan, et al., 315 Phil 39 and People v. Silong, 232 SCRA 487)

> "xxx Denial and alibi, if not substantiated by clear and convincing evidence, are negative and self-serving evidence bearing no weight in law. " (People v. Arellano, 282 SCRA 500, 507, citing People v. Apongan, 270 SCRA 713)

Maun was formerly with the 114th PC Co. stationed at Tabuk, Kalinga-Apayao, while Tumaru was stationed at Luna, Kalinga-Apayao. Their defense of denial and alibi had been effectively refuted and rendered unsustainable by the positive identification by witness Lorenzo Miguel that they (Maun and Tumaru) were the perpetrators of the felonious killing in question.

Since the prosecution has established beyond reasonable doubt the identity of the assailants, the question of motive need not be delved into.

> "xxx So settled is that proof of motive is not crucial where the identity of the accused xxx has been amply established. xxx" (People v. Quiamco, 268 SCRA 516, 530, citing People v. Lapura, 255 SCRA 85, citing People v. Flores, 237 SCRA 563)

WHEREFORE, the appealed judgment rendered in Criminal Cases Nos. 15-88 and 16-88 by Branch 26 of the Regional Trial Court, in Luna, Kalinga-Apayao, is hereby AFFIRMED. Costs against the appellants.

SO ORDERED.

Melo (Chairman), Vitug, Panganiban, and Gonzaga-Reyes, JJ., concur.

---

[1] Rollo, p. 11.

[2] Rollo, p. 13.

[3] T.S.N., Direct Testimony of Dr. Nicolas, November 27, 1989, Records, pp. 136-137.

[4] T.S.N., Dr. Nicolas, March 21, 1990, Records, pp. 171, 172, Exhibit 'Q'.

[5] Decision, pp. 7-8, Rollo, pp. 51-52.

[6] Appellants' Brief, p. 5, Rollo, p. 81.

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.