ROLE OF POLICE INVESTIGATION IN THE CRIMINAL JUSTICE SYSTEM OF PAKISTAN

1Jibran Jamshed, 2Muhammad Waqas Javed, 3Syed Wajdan Rafay Bukhari, 4Asif Safdar
1Assistant Professor, Department of Law, The Islamia University of Bahawalpur. Email: Jibran.jamshed@iub.edu.pk
2Lecturer, School of Law, Quaid-i-Azam University, Islamabad. Email: mwjaved@qau.edu.pk
3Lecturer, University Law College, University of Sargodha. Email: wajdan.rafay@uos.edu.pk
4Assistant Professor, Gillani Law College, Bahauddin Zakariya University, Multan. Email: principallaw@bzau.edu.pk

ARTICLE INFO

Article History:
Received: 11 Jan 2020
Revised: 22 Mar 2020
Accepted: 11 May 2020
Available Online: 30 Jun 2020

Keywords:
Criminal Justice System, Prosecution in Pakistan, Police Investigation in Pakistan, Poor Police Investigation

JEL Classification:
O15, G10

The purpose of this paper is to highlight the importance and effectiveness of investigation in the Criminal Justice System of Pakistan. The study provides the historical background of the Police system of Pakistan, which is primarily responsible for the investigation of crime in the Criminal Justice System of Pakistan. The study also examines and highlights the poor standards of Police Investigation and its impact on the Criminal Justice System of Pakistan. The study describes and analyzes the different statutes and laws in Pakistan which regulate the process of the criminal investigation in Pakistan. The researcher collected data through interviews from the 10 Defense Lawyers (who are representing accused in trial courts) in District Multan. Data is also collected through interviews from the 10 Public Prosecutors (who are prosecuting the accused on behalf of State in trial courts) from District Multan. The finding of the study reveals that the current system of the police investigation is faulty and outdated. In the end, this study recommends how to improve the standards of investigation in the Criminal Justice System of Pakistan.

© 2020 The authors, under a Creative Commons Attribution-Non-Commercial 4.0.

1. INTRODUCTION

Criminal investigation is an applied science that involves the study of facts, used to identify, locate and prove the guilt of an accused criminal. A complete criminal investigation can include searching, interviews, interrogations, evidence collection, preservation and various methods of investigation (O’Hara & O’Hara, 1956). Investigation includes all the proceedings under the Code of Criminal Procedure for collection of evidence conducted by a police officer or by any person, other than Magistrate, who is authorized by a Magistrate in this behalf (Criminal Procedure Code 1898). In Ballantine’s Law Dictionary, Investigation inter alia means, in a more complete sense, an inquiry, judicial or other, for the discovery and collection of facts concerning a certain matter or matters (Iftikhar vs SHO, 1999). Investigation commences after information relating to the commission of a cognizable offence is given to the police and contemplated by S.154 Cr.P.C., as the first information report and includes all the proceedings under the Criminal Procedure Code for collection of evidence conducted by a police officer or any person other than a Magistrate authorized in this behalf (Abdul Rasheed v. State, 1995). Investigation is back-bone of criminal justice system all over the globe. Everywhere Criminal Justice System starts with the complaint to the concerned authorities (normally Police) and then start of investigation. Skilled, impartial, effective and speedy investigation is pre-requisite to provide justice and punish criminals. In Pakistan Investigation plays a vital role in the ultimate fate of any criminal case. In Criminal Justice System of Pakistan, testimony of eyewitnesses carry more importance than forensic or other modern kind of evidence, hence statements recorded by the investigation officer during the investigation has paramount importance for the decision of criminal case.

1.1 Objectives of Study

The Study is conducted in order to obtain the answers of following questions;

- To describe the Process of Police Investigation in Pakistan
- To trace the historical background of investigation in the criminal justice system of Pakistan
- To describe the Criminal Justice System of Pakistan
- To understand investigation process as prescribed in Police Rules & CrPC (Code of Criminal Procedure 1898)
- To find out the major flaws in the Criminal Justice of Pakistan
• To find out the major flaws in the Police Investigation Process in Pakistan
• To provide recommendation in order the improve the standards of investigation in Pakistan

2. RESEARCH METHODOLOGY

A Qualitative Research Study is conducted using Document Analysis and Interviews. This descriptive study is conducted in order to examine, understand and describe the “Police Investigation in Criminal Justice System of Pakistan”. Primary data used for this study comprised of Statutes and Case Laws of Higher Courts. Secondary data consists of article from newspapers and other authors. The Study comprised of two phases; in the first phase of Study different laws related with the Police Investigation were examined in order to get in-depth details of the whole process. Further brief history of Police Department is also described along with the composition and working of Criminal Justice System in Pakistan. In the second phase, 30 Defense Lawyers and 26 Public Prosecutors from Multan, Muzaffargarh and Bahawalpur District were recruited through purposive sampling for interview. They were asked questions about Police Investigation, its role in court trial, reasons for poor investigations and suggestions for the improvements in the standards of investigation.

3. HISTORICAL BACKGROUND

3.1 Criminal Justice System of Pakistan at Glance

In Criminal Justice System of Pakistan, Police is the institution which is generally responsible for the investigation of offences. Although there are many other investigating agencies like FIA, NAB and Anti-Corruption yet they are limited to their own sphere and in majority of cases investigation is done by the Police Departments. History of Police system in Pakistan dated back to the colonial period of Sub-Continent under the British Rule. In 1861, British Government introduced the Police Act 1861, which was primarily designed by a foreign power to rule the indigenous people of India. Unfortunately even after more than 150 years, the same law is applicable today and people are still governed by that draconian and outdated law in Pakistan. Sir Charles Napier created an Irish-type police in the province of Sind (now Sindh the south-eastern province of Pakistan) in the 1840s, and a similar system was later adopted in other provinces. The force was armed and organized on a military basis. Its location, in barracks, like the Irish Constabulary, illustrated its source of legitimacy, structure and function as an organ of social control (Shoaib Suddle, 2015). It is crucial to understand the basic difference between colonial police and police meant for a free country. Whereas the former was geared at raising semi-militarized, semi-literate, underpaid, bodies of men for maintaining order by overawing an often turbulent and hostile – native – population, the latter aims at creating quality professionals tasked to prevent and detect crime in plural, multi-ethnic and socially conscious communities, through just and impartial enforcement of laws earning public support. The former knew how to rule, the latter to serve (Shoaib Suddle, 2015).

4. FOUR BASIC STAGES IN CRIMINAL JUSTICE SYSTEM OF PAKISTAN

First stage in the Criminal Justice System of Pakistan is registration of First Information Report under section 154 of Criminal Procedure Code 1898. After registration of FIR, second step is the investigation by Police. Investigation Officer is empowered to collect evidence and investigate the alleged offence. Third step in Pakistan’s Criminal Justice System is the Submission of Investigation Report by Police Officer to the Prosecutor under section 173 Cr.P.C. In fourth and final step prosecutor scrutinize the Police Investigation Report and submit it in the court for trial. After completion of trial in court case ends in either acquittal or conviction.

4.1 First Stage: Registration of FIR

Starting point or the first stage in the Criminal Justice System of Pakistan is the registration of First Information Report under section 154 of Criminal Procedure Code. FIR is the first information reached to a Police Officer informing commission of offence cognizable or otherwise. It is normally considered as corner stone of prosecution case, unless it is created by some mala fide intention or wrong version of the complainant is recorded by the investigating agency (Muhammad Rafiq v. The State, 2009). The term ‘first information report’ is construed as the earliest communication or intimation of crime to the State agency, to set it in motion to undertake investigation. Such information, irrespective of its brevity or length, has to convey the relevant information pertaining to the nature and place of occurrence, including the description of the victim of violence (Nawazish Ali etc. v. The State, 1985). According to s. 154 of Criminal Procedure Code 1898, “Every information relating to the commission of a cognizable offence if given orally to an officer in-charge of a police station, shall be reduced to writing by him or under his direction, and be read over to the informant, and every such information, whether given in writing or reduced to writing as aforesaid shall be signed by the person giving it, and the substance thereof shall be entered in a book to be kept by such officer in such form as the Provincial Government may prescribe in this behalf (The Code of Criminal Procedure,
Although purpose of FIR is merely to provide the information regarding the commission of any offence yet in Criminal Justice System of Pakistan FIR plays very important role. Any contradiction, weakness and discrepancy in FIR ultimately become fatal for the prosecution case and results in acquittal of accused person in all type of cases.

4.2 Second Stage: Investigation by Police

After registration of FIR, Police investigation starts which is the second stage in Criminal Justice System of Pakistan. Section 156 of Cr.P.C. empowers the Officer in-charge of Police Station to start investigation in any cognizable case. Cognizable cases are those cases in which police can arrest without warrant. In Pakistan Criminal Justice System, majority of offences are of cognizable nature as defined in the schedule of Cr.P.C. During the investigation of case, Investigation Officer (IO) collects all available evidence regarding the commission of offence. IO records the statements of witnesses, he can arrest any person who is associated with the commission of offence and deals with the all other matters related with investigation of offence. After completion of investigation, it is the duty of Investigation Officer to submit the report of his investigation to the Prosecutor under section 173 of Cr.P.C. Investigation consists of, first proceeding to spot; second, ascertainment of facts and circumstances of case; third, discovery and arrest of suspected offender; fourth, collection of evidence (Abdul Latif vs IG Police, 1999).

4.3 Third Stage: Submission of Investigation Report to Prosecutor

Under section 173 of Cr.P.C. it is duty of Investigation Officer to submit the complete investigation report to the office of Prosecutor for its onward submission in the court of concerned Magistrate within 17 days. The report of investigation is also known as “Challan” in Criminal Justice System of Pakistan. Investigation agency has no authority whatsoever to give finding of guilt or innocence regarding accused persons under the provisions of Criminal Procedure Code, 1898. It is only be prerogative of court to give finding after recording statements of accused regarding guilty or innocence of accused (Anwar Shamim etc. v. The State, 2010). This stage is also important because active role of prosecution starts when Police Officer submit the report to the prosecutor. At this stage prosecutor is empowered to point out any deficiencies in the report and return it to the Investigation officer if necessary. Similarly if prosecutor finds that the report is complete, he forwards the report to the concerned court to start the trial of accused in the court.

4.4 Fourth Stage: Submission of Report in the court by Prosecutor after Scrutiny

Prior to the 2006, the role of Prosecution was very limited and almost non-existent. There was no independent Prosecution Service and officials of Police used to play the role of Prosecutors in the court, where necessary. Punjab Criminal Prosecution Service Act 2006 established the independent Prosecution Service in Punjab and similarly other Provinces in Pakistan also promulgated the laws and established their separate and independent prosecution services. The role of prosecutor is important during the investigation and Investigation Officer has to submit the report to the Prosecutor and after thorough scrutiny of report it is submitted in the court. If prosecutor think that case is fit for trial, he can mention the same on memorandum (Punjab Criminal Prosecution Service Act, 2006) and submit the same in court with recommendation to commence the trial. Trial ends in conviction or acquittal and it is the last stage in process of Criminal Justice System in Pakistan.

5. ROLE OF INVESTIGATION OFFICER IN POLICE INVESTIGATION

Investigation Officer belongs to Police Force (normally a lower rank Police Officer i.e. ASI or SI) who is given the responsibility to conduct the investigation of every reported offence. Immediately after the registration of FIR, the investigation is marked to the police official of concerned Police Station by Station House Officer (SHO). According to the guidelines given by High Court in (Abdul Latif vs IG Police, 1999) “Investigation generally consists of the following steps;

- Proceeding to the spot
- Ascertaining of the facts/circumstances of the case
- Discovery and arrest of the suspected offender
- Collection of evidence relating to the commission of the offence
- Examination of various persons (including the accused) and the reduction of their statements into writings
- The search of place or seizure of things considered necessary for the investigation and to be produced at the trial
- Formation of opinion as to whether on the material collected there is a case to place the accused before Magistrate for trial

Section 156 of Cr.P.C. empowers the Officer In-charge of Police Station to investigate any cognizable offence. Section 157 of Cr.P.C. empowers the Officer In-Charge of Police Station to depute one of this subordinates officers,
not below rank of ASI, to the spot for the investigation of facts and circumstances of the case and arrest of offender if necessary. Chapter 25 of Police Rules 1934 provides complete details and guidelines for the investigation officer.

6. ROLE OF PROSECUTOR IN POLICE INVESTIGATION

The Prosecutor’s role in Police investigation is very important. According to s.9(7) of the Punjab Criminal Prosecution Service Act 2006, “A Prosecutor may submit to the court results of his scrutiny in writing as to the available evidence and applicability of offences against all or any of the accused as per facts and circumstances of the case”. The power of Prosecutor to write result of scrutiny is also known as Case Review in many developed Countries of the world like UK, Germany etc. In this Memo u/s 9(7) or Case Review Prosecutor writes about the applicability of offence and available evidence against accused and then advice court to commence trial (if sufficient evidence is available) or to postpone the commencement of trial if sufficient evidence is not available. Under the provisions of section 9(7) of Act, 2006, District Prosecutor has the powers to scrutinize the available evidence and applicability of offences against all or any of accused as per facts and circumstances of the case. Deletion or insertion of any offence falls within the exclusive domain of the district Prosecutor. Question whether the District Prosecutor has rightly deleted section. It would be seen by the trial court at the time of framing the charge, such fact cannot be challenged either under section 22-A or 22-B of Cr.P.C. or in constitution jurisdiction of High Court (Rasoolan Bibi vs ASJ PLD, 2009). The above discussed ruling of Lahore High Court is among many other rulings of high courts which laid down the principle that the insertion of correct section of law is prerogative of prosecutor, after or during the investigation of offence. Similarly according to SOP’s signed by Police and Prosecution, it is necessary for investigation officer to keep in touch with concerned prosecutor during the investigation of case and seek advice of prosecutor for the collection of evidence. According to the SOP, Role of Prosecutor starts with the registration of FIR. It is the duty of SHO to provide the copy of FIR to the Office of Prosecutor immediately after its registration under Punjab Criminal Prosecution Service Act 2006. Investigation Officer is duty bound to inform the concerned Prosecutor during investigation and to seek the legal opinion from Prosecutor regarding the evidence.

7. FINDINGS

In order to get the real picture of situation it is necessary to get the feedback from those who are dealing with the matter at hand.

7.1 Interviews from Lawyers

In order to get in-depth knowledge about the process of Police Investigation, interviews of 30 Defense Lawyers (conducting trial of different cases in the trial courts on behalf of accused) are interviewed from District Courts of Multan, Muzzafargarh and Bahawalpur. The interviews were un-structured but followings are some important questions asked to the participants;

- What is your opinion regarding the Police Investigations in Criminal Cases?
- What is the standard of Police Investigation in cases?
- If you think standards of police investigations are poor then what are the main reasons behind it?
- If you think standards of police investigations are poor then whether it helps the accused to get acquittals?
- What are the recommendations for the improvements?

In reply to the first question, majority of respondents showed serious concerns regarding the Police Investigations. Majority of respondents replied that Police Investigation is simply outdated and needs improvements. They considered Police Investigator as corrupt and inefficient. The respondents agreed that police investigation plays vital role in the ultimate result of trial. The respondents were asked about the standard of Police Investigation, all of them unanimously replied that Police Investigation Standards are very poor. After they replied that standards of police investigation are poor they were asked about the reasons behind poor investigation of police. They identified that the lack of training, lack of intent, corruption, lack of check and balance and outdated laws are the main reasons behind poor police investigation. All the respondents were asked whether the poor investigation help the criminal to get acquittal from the court. All of them replied in affirmative and described the high acquittal rate as direct result of poor police investigation. The respondents were asked to give recommendation about the improvements of Police Investigation in Pakistan. They identified that through proper training, check and balance, dedicated and trained investigation officers, separate investigation wing and proper government attention, the standards of investigation can be improved.
7.2 **Interviews with Prosecutors**

Public Prosecutor is the person who supervises the Police Investigation and also checks the final Investigation Report of Police before its onward submission in the court. It is also the Prosecutor who actually conducts the trial in the court on the behalf of State. In order to get the opinion of Prosecutors regarding Police Investigation, interviews of 26 Prosecutors from District Courts of Multan, Muzaffargarh and Bahawalpur were conducted and following questions were asked;

- What is their general opinion regarding the Police Investigation?
- What is the standard of Police Investigation?
- How Police Investigation effect the trial in the court?
- Is police Investigation responsible for the high acquittal rate in court?
- What are the reasons behind poor police investigations (if you think it is poor)?
- What are the recommendations for improvement of police investigation?
- How Prosecution Department can play its role to enhance the standards of Prosecution?

When respondents were asked about their opinion about regarding the Police Investigation, majority of them showed serious concerns regarding the investigation of police. The respondents were asked about the standards of Police Investigations. Majority of them indicated that investigation standards are poor. Although some of them replied that the investigation standards are improving after the establishment of independent Prosecution Department. The respondents were asked about the effect of poor investigation on the trial. All of them replied that due to poor investigation they face many difficulties in the trial of criminal in courts. The respondents were also asked whether poor police investigation is responsible for the high acquittal rate. All of them agreed that poor investigation is among the top factors for high acquittal rate in Pakistani Courts. The respondents were asked about the major reasons behind the poor investigation by police. They indicated that multiple factors are responsible for that which includes corruption in police department, lack of professionalism, lack of proper investigation training, lack of resources at the disposal of Investigation Officer, absence of separate investigation wing within the police and burden of work on a single investigation officer. The respondents were also questioned about what positive role Prosecution Department can play to improve the standards of investigation. They replied that increasing role of prosecutor in Police Investigation is already improving the standards of police investigation. They suggested that role of Prosecutor should be enhanced further in order to improve the situation. The respondents were asked about their suggestions for the improvement of poor police investigation. All them indicated; elimination of corruption in Police Department, provision of training to investigation officer, creation of separate investigation wing, check and balance on Investigation Officers, more financial resources, enhanced role of Prosecutors during investigations and up gradation of outdated laws can help to improve the poor investigation.

8. **CONCLUSION**

The findings of this study revealed that the Police Investigation plays a vital role in the criminal justice system of Pakistan but the Police investigation procedures and methods are outdated and inefficient. The study highlighted that lack of training, outdated laws, no check and balance, and lack of motivation are the main factors behind poor standards of Police Investigation. The empirical evidence provided by the study also linked the high acquittal rate in Pakistan Criminal Justice System with the poor police investigation. The study also highlighted that the rampant corruption in Police is the leading cause of poor investigation which needs urgent attention. The study suggested that all the outdated laws dealing with Police Investigation should be changed and updated. The study also suggested that the role of the prosecution in the pre-trial stage should be enhanced and many sections of Cr.P.C. should be amended to improve the standards of Police Investigation.

9. **SUGGESTIONS/ RECOMMENDATION**

First of all, there is an urgent need to update the laws according to the needs of modern times. There are plenty of defects and anomalies in Code of Criminal Procedure 1898. It is recommended to make committee of specialists who can review the whole process of Criminal Justice System given in Cr.P.C. Committee should be given task to update the Cr.P.C. according to modern standards and while keeping in view the developed Criminal justices Systems in the world.
9.1 How to Improve the Investigation process through Prosecutor

After the promulgation of dedicated and separate Prosecution Services in all provinces of Pakistan, the role of prosecution is increasing with the passage of time. The process of criminal investigation can be made more effective and comprehensive with the proper use of Prosecution Department.

9.1.1 Increase Role of Prosecutor during Investigation

First, there is need to increase the role of Prosecutor during the investigation. According to the SOP’s signed by Police and Prosecution, Prosecutor is playing supervisory role during the investigation but ground realities are different. Investigation Officers only come to the Office of Prosecutor after they completed the investigation report. In this respect there is need to amend the Cr.P.C. and Prosecution Act 2006 so it become compulsory for the Investigation Officer to consult and inform the prosecutor during the process of investigation.

9.1.2 Case Review of Prosecutor and Case Dropping Power

Section 9(7) of Punjab Criminal Prosecution Service Act authorizes the prosecutor to write down the result of his scrutiny before submission of Report to the concerned Magistrate. According to section 9(7), “A Prosecutor may submit to the court results of his scrutiny in writing as to the available evidence and applicability of offences against all or any of the accused as per facts and circumstances of the case (Punjab Criminal Prosecution Service Act, 2006). Under the section 9(7), if Prosecutor finds that there is sufficient incriminating material available against accused and offences are also applicable, he can send the Report to the Magistrate along with request to commence the trial. Similarly, if Prosecutor finds that there is no evidence or insufficient evidence available against accused and there is no probability of conviction on the basis of available evidence, Prosecutor can forward the Investigation Report to the Magistrate with request not to commence the trial. When Magistrate receives the Investigation Report along with Result of Scrutiny, it is up to Magistrate whether to commence trial or not, irrespective of opinion of Prosecutor regarding commencement of trial. In many cases Magistrates pay no attention on the recommendation from the Prosecutor and start the trial even when Prosecutor not recommends the commencement of trial. There is need to amend the provisions of Cr.P.C. and Prosecution Act in order to bound the Magistrate to follow the opinion of prosecutor. The Cr.P.C. section 173 could also be amended in a way that when Prosecutor decide that case must be dropped due to lack of evidence, he simply drop the case and not send the Investigation Report to the Magistrate. This purposed amendment can lessen the burden of cases on Judiciary as there are majority of cases where after commencement of trial, accused get acquitted under section 249-A of Cr.P.C. In this way lot of time and hard work of both Judge and Prosecutor can be saved by nipping the evil in the bud. Further it can also help to decrease the trend of false litigation.

9.2 How to improve the investigation process through Investigation Officer

Investigation Officer is a police official (normally SI or ASI rank) who is entrusted with the investigation of criminal case in Pakistan. The role of Investigation Officer is very crucial in the Criminal Justice System because whole case depends upon the skills, performance and intention of Investigating Officer. In Criminal Justice System of Pakistan, the investigation standards are very low and Police Investigators are often criticized due to their incompetency and corruption. Due to poor investigation and inability of Investigation Officer to collect evidence, majority of prosecution cases ends in acquittal of accused. In order to improve the standards of investigation and credibility of Investigating Officer following measure should be taken;

- There is no limit to the number of investigations marked to an Investigation Officer and as a result majority of Investigation Officers in Punjab Police are burdened with 20 to 50 investigations at a time. It is not possible for any Investigating Officer to work properly on the cases under such heavy work load. There should be some limit on the maximum number of investigations to one Investigation Officer at a time so he can work properly on the cases in hand.
- Secondly, there are no financial resources at the disposal of Investigation Officer to conduct the proper investigation. Although there is provision of investigation fund but it rarely reaches down to the Investigation Officer due to corruption and mismanagement in Police. As a result, complainant party has to bear all the expenses like travelling and accommodation costs of Investigation Officer.
- Thirdly, there is no special and separate wing for the Investigation of offences. Although Police Order 2002 provided for the establishment of separate Investigation wing, yet in practice there is no such wing and Investigation Officer has to do all other duties like watch & Ward and VIP Protection along with investigation of cases. In this scenario it is impossible for Investigation Officer to allocate all his time for the proper investigation of the case which ultimately results the poor investigations. Government should need to make
separate Investigation Force within the Police Department with only task of conducting the investigation of offences.

- Fourthly, it is needed that separate investigation wings be established within a broader Investigation Force. In 21st century there are many new types of crimes which require different and advanced skills for investigation officer. For example Cyber Crimes are growing with passage of time and there must be separate Cyber Crime Wing of Investigation which consists of highly trained Investigation Officer with strong knowledge of IT. Similarly, separate wings must be established for drug crimes, homicide, banking etc.

- Fifthly, Investigation Officers must be given proper training in their field. Use of modern devices is absolutely necessary in today’s modern world but in Pakistan, investigation still depends upon old and outdated methods. There must be specialized trainings for the Investigation Officers along with provision of modern devices so that they can conduct the investigation on modern and scientific lines.

- Sixthly, there is an urgent need to replace the outdated method of Case Diaries. According to s.172 Cr.P.C., “every police officer making an investigation under this chapter shall day by day enter his proceedings in the investigation in a, setting forth the time at which the information reached him, the time at which he begun and closed his investigation, the place or places visited by him and a statement of the circumstances ascertained through his investigation (The Code of Criminal Procedure, 1898). Investigation officer is duty bound to write the case diaries on daily basis. It is useless to write about the event which has no significance for the investigation of the case. It not only cause wastage of time for the Investigation Officer but also cause inconvenience for him.

- Seventhly, during investigation Cr.P.C. empowers the Investigation Officer to take physical custody or physical remand of accused for maximum of 14 days. There is also need to enhance that period in cases of serious nature like homicide and rape etc.

- Eighthly, Section 173 of Cr.P.C. provides period of 17 days for the completion of investigation and submission of report to the Prosecutor. This clause is outdated and flawed. Different cases of technical nature require more time for the thorough investigation.

REFERENCES

Abdul Latif vs IG Police 1999 P.Cr.L.J. 1357
Abdul Latif vs IG Police 1999 P.Cr.L.J. 1357
Abdul Rasheed vs State PLD 1995 Karachi 16
Anwar Shamim etc. vs The State 2010 SCMR 1791
Criminal Procedure Code 1898, Pakistan
Ifikhar Ahmad vs SHO 1999 P.Cr.L.J. 1831
Muhammad Rafiq vs The State 2009 YLR 1279
Nawazish Ali etc. vs The State 1985 P.Cr.L.J. 1712
Position Paper, Police System of Pakistan, 2015 by Dr. Shoaib Suddle
Punjab Criminal Prosecution Service Act 2006
Rasoolan Bibi vs ASJ PLD 2009 Lahore 135
Subhash Chandra Singh, Criminal Justice: An Overview, CrLJ, March 1999, p. 44.
The Code of Criminal Procedure 1898