

Journal of Educational Research & Social Sciences Review (JERSSR)

Analysing the Role of Fire Arms as Evidence in Homicides in Pakistan

1. **Manzoor Hussain** LLM Scholar, (Session 2021-2022), Abdul Wali Khan University Mardan
2. **Dr. Hidayat Ur Rehman** Assistant Professor, Department of Law, Abdul Wali Khan University Mardan
3. **Dr. Ashraf Ali** Associate Professor, Department of Law, Abdul Wali Khan University Mardan

Abstract



To bring actual offenders to justice, Pakistan's criminal justice system is made up of a number of parts such as police, prosecution, judiciary, prison and probation that operate together. Our legal system has a number of mechanisms and rules for the application and endorsement of cutting-edge techniques and research in the prosecution and investigation of crimes. According to various laws and dicta established by rulings of superior courts, using a qualitative approach, this article analyze the usefulness of firearms and their expert reports as evidence in murder cases in Pakistan. It also looks at the function of these reports and how they can influence whether a case ends in conviction or acquittal. Additionally, it makes some recommendations for improvement in how to use these reports in compliance with the law and established practices. Implementation of these recommendations will enable various stakeholders of the criminal justice system in holding true offenders accountable and exonerating innocent people.

Keywords: Fire arms, Empties, Murder, Evidence, Forensic Science Laboratory (FSL) and Punjab Forensic Science Agency (PFSA).

Introduction

There has always been crime in human history. The types of crimes have changed over time, as well as their modes and methods. Such crimes risk people's lives, freedom, and property and have an effect on all facets of society. Therefore, in order to combat these crimes, several civilizations have created various cutting-edge methodologies and technology for dealing with the same. Any state's criminal justice system today is made up of numerous organizations, including courts, prosecutors, and agencies responsible for investigating crimes. Forensic science assists law enforcement agencies and courts in a criminal justice system. These services are offered as a result of expert opinions presented in forensic expert reports. These professionals investigate the victim's evidence, evidence from the crime site, and other areas to offer unbiased conclusions that can help law enforcement, prosecution and courts to determine a person's guilt or innocence.

Pakistan inherited British-era laws that included several sections for the use of contemporary techniques. Later on, old laws were amended and new laws were passed to make use of innovative procedures in controlling offences. Contrary to technologically advanced countries where expert's opinion have assumed the role of principal evidence in criminal trials, much work remains to be done in the field of forensic reports in Pakistan's legal system, both in terms of the amount of their usage and its appreciation as evidence.

A forensic report is one that is produced as part of an inquiry into an alleged crime by a person with specialized training or experience. It comprises the results of forensic examinations expressed as facts, assessments, or a mixture of the two, such as a post mortem report (Law Insider, 2022). Such research is the result of experts using science. According to a typical definition, forensic science is the application of science as well as scientific techniques to criminal cases that are being investigated.

This article will examine the evidentiary significance of firearms and their reports in murder cases, as well as how they can boost the rate of conviction. It will, likewise, concentrate on how the reports are used and understood incorrectly, as well as how they lead to acquittal in these cases. There will also be suggestions for suitable alternatives that will make the existing scenario better.

Legal Provisions Regarding Fire Arm Expert Opinion in Pakistan

Ballistics is the branch of forensic science that deals with weapons. It describes the techniques, rationale, and frequency with which weapons are used in commission of offences. According to Black's Law Dictionary, a "fire arm" is a weapon which discharges a ballistic object (like a bullet or pellet) following the burning of the gunpowder or other explosive (Garner, 2009). In case of murder involving the use of such weapons, expert opinion on fire arms can be extremely useful in assessing either the innocence or the guilt of an accused.

Article 59 of the Qanun-e-Shahadat Order, 1984 (QSO) states that when a court is required to render an opinion on any foreign law, science, or art, or the identity of handwriting or fingerprints, the opinions of such persons expert in these subjects will be relevant (Punjab Police, n.d.).

Word related in the said article indicates the court can rely on it when deciding any factual or legal issue. The preceding provision encompasses all types of expert reports because the term science is comprehensive and includes all disciplines of research such as expert reports on guns, chemicals, or biology. These reports are referred to as expert reports, and these individuals are recognized as experts. Their perspectives are particularly meaningful when there are no eyewitnesses to an occurrence. The Sindh High Court ruled in case titled *Muhammad Irfan vs the State* (2008) that when oral evidence from witnesses who have a relationship with a party contradicts reports of experts, it is a fundamental principle they take preference over the oral testimony. Such experts are public officials who produce reports as part of their job. They are not aware of the facts of an occurrence and are not acquainted with or affiliated to any of the party (Muhammad Irfan v. the State, 2008).

The Qanun-e-Shahadat Order, 1984 under Article 164 states that courts may examine all sorts of proof that have become available because of the use of contemporary instruments, and convictions may be based on such evidence if it is believed to be reliable. This is due to the fact that science improves daily, making it impossible to explain in detail each and every approach that a professional investigator might utilize while looking into a criminal case (Punjab Police, n.d.).

Such reports can be presented as evidence without the assistance of experts because they are acceptable per se. According to Section 510 of the Code of Criminal Procedure, 1898 (Cr.P.C.), reports from government-appointed experts in the fields of chemistry, firearms, forensic science, and other subjects are admissible in court even if the expert does not attend as a witness. The court might call a person with such expertise as a witness for clarifying the issue if there is any ambiguity (Financial Monitoring Unit, 2001).

Code of Criminal Procedure and QSO are general rules, but special laws were eventually enacted by each province to provide legal backing for all types of expert opinion. For example, under section 9 clause 3 of the Punjab Forensic Science Agency Act, 2007, all forensic experts appointed in the agency's opinion are protected and legally covered, and their reports are acceptable in the same way as reports under the Cr.P.C and QSO (punjablaws, 2007).

Under Chapter 25 of the Police Rules, 1934, there are various rules for guiding and authorizing investigation officers in soliciting and employing expert advice whenever appropriate. When necessary, the investigative officer is expected to obtain technical help from a relevant expert under Chapter 25 Rule 14. Rule 33 describes the procedure for spot protection and evidence collection. Rule 41 to rule 47 deal with the method for sealing various types of items and forwarding them to fire weapons experts (Police Rules, 1934).

Murder Cases and Fire Arms

Under section 299 clause (j) of the Pakistan Penal Code, 1860 (PPC), murder means causing the death of another person, whereas Murder or Qatl-e-Amd under section 300 means when a person wilfully murders another person. It also includes intentionally causing harm to others; if one knows that his actions are so risky that they could kill someone else and he kills them as a result of such actions, he is considered to be guilty of murder. One definition of murder is the deliberate killing of an individual, both directly or indirectly by causing severe injuries (Mahmood, 2019).

In majority of murder instances, firearms are used. The accused murders the victim using a firearm of some type. As a result, if a thorough investigation is carried out, empties of fired bullets can be recovered from the scene and sent to a laboratory for examination. Empties from the crime scene and, if possible, weapons from the accused are collected by the investigating officer and sent to the forensic science laboratory (FSL) for expert evaluation and comparison. These experts give their findings in shape of reports. Such reports explain whether the empties were fired from one and same

or different weapons. They also explain whether the empties were fired from the recovered weapon or otherwise. A positive report supports prosecution version. On the other hand, a negative report from FSL can disprove the mode and manner of occurrence.

Role of Fire Arms and their Expert Opinion in Conviction in Murder Cases

Vast majority of murders in our country are committed through a firearm. A firearm is used in around 70% of all homicide events (Truman, 2013). Ballistics can be used to determine the kind of weapon used in a crime, and possessing this information can help investigators find the offender. Expert reports can assist in establishing a case in a variety of ways.

Although an accused's admission of guilt is a form of evidence and may be used to hold him accountable, such admissions are not always true and voluntary, as the accused may be acting under duress or voluntarily admitting the guilt of others in order to protect his loved ones from punishment. As a result, the court requires that such admissions be true and voluntary. The context of each and every case can be used to determine these two factors. A report from a fire arm expert can support a confession and thus help establish or refute its veracity in circumstances involving fire arm assault.

In *Bahsed Alias Chand etc v. State etc* (2022) the Lahore High Court while upholding the accused's conviction noted that the confessional statements of all the three accused were fully supported by eyewitness testimony, identification techniques, and medical evidence. According to Punjab Forensic Science Agency (PFSA), the gun recovered from accused Fiaz alias Mansha matched with crime empty recovered from place of occurrence and positive FSL report further supports confessional statement of all the accused (*Bashed Alias Chand etc v. State etc*, 2021).

Reports from firearms experts based on circumstantial evidence can demonstrate both the accused's true intent and the method of the offense's commission. In case of *Muhammad Afzal v. The State and Others* (2017) the Lahore High Court upheld the accused's conviction because he gave his family alcohol before shooting them to death. The appellant/accused was found to be unable to argue that his heinous act was the result of provocation because he admitted to having fully planned the crime, had gotten medication before the incident, and had a revolver with a 30 bore and benzodiazepine-class tranquilizer on him. The appellant administered anesthetic to his family members in tea, and when he realized they were unconscious, he killed them, according to medical evidence (*Muhammad Afzal v. The State and others*, 2016).

A variety of proofs are provided to the court during the course of the evidence to support the accusations made against an offender. In such situations, FSL reports can be quite useful in demonstrating veracity of the allegations.

In *Naseebullah and Others v. The State* (2022) it was decided that the prosecution's case had been greatly strengthened by the recovery of the convicts' 9 mm firearm from the spot. The 9 mm pistol that was found and its ammunition were forwarded to FSL for analysis. Following examination, the FSL concluded in its report that the recovered pistol was used to fire the empties (*Naseebullah and others v. The State through Prosecutor General Balochistan and others*, 2019).

It is the responsibility of an investigation officer to compile all pertinent bits of evidence for each specific case. The majority of this information is collected on the spot. Oral testimony, however, is valued more highly than other kind of evidence in our judicial system. Recovery of weapon of offence and empties is not always necessary if there is direct proof in the form of eye witnesses. When the incident occurred on a busy road, the accused destroyed the weapon after the offence, or steps were taken to hide the evidence, such recovery may not always be achievable.

In *case of Moulvi Taj Muhammad and 3 others v. the State* (2007) investigation officer took into possession few empties from crime scene. It was observed by court, while maintain conviction of accused, that recovery of empties and resulting FSL reports are mere corroborative pieces in support of direct evidence. Thus a negative report on non-recovery of crime empties would not be fatal if prosecution's case is otherwise proved through direct evidence (*Moulvi Taj Muhammad and 3 Others v. The State*, 2007).

When an accused person carries a firearm and fires it, it is obvious what his intentions are. While such shooting occasionally sets off other events that can lead to someone's death, it can also hit someone directly and kill them. In such a series of events, forensic specialists' assessments not only support the accused person's motive but also corroborate the details of what actually happened.

In *Ghulam Mustafa v. The State and Others* (2013) the accused entered the deceased's gas store while he was there and began firing indiscriminately, hitting a cylinder and causing a blast. The appellant was arrested on the day of the incident while he was in his home close to the scene. The court while upholding conviction of accused ruled that positive FSL report regarding the crime empties and weapon of offence proved prosecution's case against the accused (*Ghulam Mustafa v. The state and other*, 2013).

Role of Fire Arms and their Expert Opinion in Acquittal in Murder Cases

In a murder case, recovery of crime scene materials and the offender's weapon is a crucial piece of evidence that can support many different aspects of the crime. However, they are unfortunately not always handled by authorities in an appropriate way, and this results in loss of their value. By sending these pieces of evidence once the accused has been arrested, the courts are unlikely to accept them as evidence since they may have been planted, and as a result, the accused is finally found not guilty.

In case of *Zulfiqar Ali v. State Etc* (2019) despite a favorable FSL evaluation, court observed why the empties were sent for expert examination after the appellant had already spent nine days in custody. Given the circumstances, it cannot be discounted that the situation was managed and directed by firing bullets from the weapon retrieved at the accused's insistence in an effort to sway the ballistic expert's verdict in the prosecution's favor. In any event, it was unlawful because the empty was delivered to the PFSA's office after the convicts were apprehended, and recovery of weapon thereafter is not important (*Zulfiqar Ali v. State etc*, 2019).

According to law, anything found on the accused's pointation is admissible as proof. In any instance, after arriving at the scene, the police attempt to recover any empty containers, and if the accused is taken into custody, the police attempt to recover the offending weapon. For comparison and confirmation that the empties were discharged from the recovered weapon, such pieces are sent to FSL. A favorable report suggests that accused is guilty. However, if the FSL report is negative regarding empty and pistol, such discovery is irrelevant even though on the instance of accused, and loses its significance.

In *Muhammad Haris Khan v. State Etc* (2020) while acquitting the accused, it was decided that recovery of the Kalashnikov following the accused/appellant's pointation in the case is irrelevant given the unfavorable PFSA report regarding matching of the weapon with crime empties (*Muhammmad Haris Khan v. State etc*, 2020).

Sometimes authorities transmit these items weeks later or send empty and a pistol together even though they were seized on different days owing to error or ignorance. Not only were the empties and pistol sent together in the case of *Muhammad Qasim v. State* (2021), but there was also a three-week delay in getting these to FSL. As a result, the court exonerated the accused (*Muhammad Qasim v. State*, 2021).

Section 161 of the Cr.P.C states that investigation agency is allowed to question any individual who is familiar with the circumstances of the case or connected to the incident, and if he feels it is necessary, he may put his conclusions in writing. Sometimes the prosecution's case can be destroyed by failing to record a crucial statement. The official who delivered empties to FSL is required to be examined as a witness to prove delivery of same to the laboratory.

In *Asif v. State* (2020) despite a favorable FSL assessment, it was decided that there is no recorded evidence to support the transfer of 09 empties to the PFSA, Lahore. Given this background, the prosecution's case was not supported by recoveries in this case, and accused was released (*Asif v. State*, 2020).

Before crime empties and weapons may be used as evidence by the court, they must first be safely stored and transmitted. This means that every step of their handling—from their recovery to the police station, where they were safely held before being sent to the lab—must be supported by evidence, and all pertinent witnesses must be examined. If this is not done, they will no longer be useful as evidence. The loss of this line of custody occurs most frequently as a result of an inadequate investigation into the crime.

In *State through AG Khyber Pakhtunkhwa, Peshawar v. Sajid Munir* (2022) it was noted that although officer who investigated the case claimed that station clerk transmitted case property to FSL, however, his statement on the case property's secure keeping and transmission to FSL was not recorded. The court ruled that neither the Moharrir nor the person who is said to have delivered the recovered articles there were examined in order to determine their secure custody prior to being sent

to the FSL. As a result, the offender was exonerated (State Through Advocate General Khyber Pakhtunkhwa, Peshawar v. Sajid Munir, 2022).

The prosecution case suffers when there is a delay in reporting a case or in pursuing specific actions in the case. Depending on which is recovered first, the FSL should receive the crime empty or the offending weapon. Serious doubts are raised about the validity of the case property when it is sent to the FSL for analysis after delay, and these doubts are passed to the accused in the form of his acquittal.

In *Haris v. Zahoor Khan* (2022) it was decided that the firearm and empty were sent to FSL with an additional six and twelve day delays, respectively. The prosecution had not provided any evidence regarding where the empty magazine and the pistol were during the specified time period or whether they were in secure custody or not. Firearm expert's report was favorable, yet the accused was nevertheless found not guilty (*Haris v. Zahoor Khan*, 2022).

There have been cases where the crime scene weapon or other incriminating things seized are not delivered to FSL, making them ineffective as evidence. In murder cases, police are responsible for conducting an investigation. They have about two weeks to do so before they must produce a report. An officer may be given multiple cases at once, or he may not have had the required training, in which case he may have misuse forensic tools and evidence.

In *Abdul Wahid and Others v. The State and Others* (2020) it was held that the purported empties could not be utilized as evidence to support a conviction since they were not supplied to FSL and were not recovered from the crime scene. Furthermore, since direct testimony from prosecution witnesses (PWs) has already been found to be unreliable in the current case, corroborated evidence is meaningless in cases where direct evidence is not accepted (*Abdul Wahid And Others v. The State And Others*, 2020).

Expert reports are produced in original form and typically contain an embossed stamp proving their authenticity. A duplicate report was submitted in the following case, which means it cannot even be used as additional proof. The investigating officer ought to have explained and checked the information in the FSL report. After the challan was submitted, it was the responsibility of the prosecution and the courts to summon the concerned forensic examiner in line with section 94 and section 510 Cr.P.C. to testify and explain the matter instead of immediately rejecting the report.

In *Qaiser Nadeem v. The State, Etc* (2019) while acquitting accused it was observed that use of Mark-A as evidence is prohibited by Section 510 of the Cr.P.C. since it is a copy of a report from the PFSA, Lahore (*Qaiser Nadeem v. The State, Etc*, 2019).

The recovery of the weapon and any empties, for example, must corroborate the oral accounts of the witnesses. Despite a favorable FSL report, the court will not rely on a recovery if it contradicts the truth or does not make sense to a reasonable person.

For instance in *Zeeshan @ Shani v. The State* (2011) while considering positive report of FSL it was decided that this report should be regarded as corroborated information rather than proof of the accusation. As it stands, neither the recovery of the empty nor the appellant's guilt can be proven by this as neither the appellant's identity has been proven beyond a reasonable doubt. Although their escape from the scene has been reported, it is exceedingly improbable given that the complaint asserts that the perpetrator did not reach out the car's window to shoot at the victim. Consequently, the findings from the ballistic expert would not truly support the prosecution's case. (*Zeeshan @ Shani v. The State*, 2011).

In our legal system, the courts consider both oral and documentary evidence. The testimony of eye witnesses is very important. Such witnesses must provide evidence regarding their presence and the accused's involvement in the offence. Expert reports are of limited assistance if such eyewitnesses are not called or if they are examined but they are unable to substantiate the allegations against the accused since such reports merely confirm what has previously been said and reduced into writing.

In *Muhammad Aslam and Others v. Khursheed Alias Bago and 3 others* (2003) according to the ruling, evidence founded on relevant examiners reports that are accounts of the events that occurred after the occurrence includes firearms and FSL reports etc. Getting the gun and its empties is similar evidence. They might have been relevant and indisputable evidence if the prosecution had not insisted on using the direct eyewitness testimony or if the direct evidence had been provided as alleged. Expert testimony or expert opinion is required if there are no eyewitnesses to the occurrence

and the case is only supported by circumstantial evidence (Muhammad Aslam and others v Khursheed Alia Bago and three others, 2003) .

Recommendations

Following are some recommendations regarding firearms.

- As soon as possible after a crime, the complainant and police must attempt to secure and preserve the spot. Every police station should make an effort to educate the local populace about the relevance of the scene of an incident in criminal cases as well as how to preserve it.
- The investigation officer must have the investigation kit at the time of the spot inspection, and if necessary, he should request assistance from additional professionals, such as crime scene experts.
- Empties and firearms after their discovery must be correctly sealed by monogram of the seizing officer. Where possible private witnesses may be associated with such recovery.
- Different types of weapons and empties needs to be sealed separately. Each package should include a description of the case. Even if they are of the same kind, items collected from several locations of a spot should ideally be sealed separately.
- Safe transmission of empties and firearms from place of occurrence to police station and later to FSL must be ensured in all cases.
- Recovered articles must be placed in a malkhana and recorded in the appropriate register. All registers must be kept strictly in line with the Police Rules of 1934 or any additional requirements specific to the investigation agency.
- All articles recovered must be immediately forwarded to FSL.
- The application to FSL should include any pertinent inquiries. If there are multiple accused, it is important to compare fingerprints (if available on weapons), if they are discovered on weapons, etc., and ask particular questions to determine each accused's involvement in the crime.
- FSL reports should be printed on paper with distinguishing embossing and security features.
- Upon receiving the FSL report, it should be examined to ensure that it is properly formatted, correctly signed, and has all the necessary information. The FSL authorities should be contacted as soon as possible if there is any ambiguity.
- The official who transports case property to FSL and the station clerk/mohair's statement should both be recoded right away. Recoding of witness statements of recovery memos through which such items are obtained should also be recorded at the earliest.
- Members of the investigative agencies, judges and prosecutors should all receive regular training from legal and scientific specialists to keep them informed of advancements in the scientific and legal ways of gathering, presentation and appreciation of such evidence.
- To shorten the time required for the generation of these reports, more laboratories should be constructed, if possible one in each division. Delays in forwarding samples and submitting challans can be reduced once these labs are established in various locations.

Conclusion

In Pakistan, firearms are typically employed as weapon of offence in most of the murder cases. Reports from firearms specialists in situations like these are therefore of utmost significance. Such reports are by themselves admissible as evidence under the QSO, Cr.P.C. Police Rules, and various provincial laws. These reports are beneficial in both direct evidence and circumstantial evidence scenarios. Such assessments from firearms specialists in murder cases might aid the prosecution in demonstrating the accused's confession. Additionally, it provides evidence in favor of the way in which crimes were committed, aiding in the validation of the accusation against the accused person. Unfortunately, these pieces of evidence are not always used in line with the law, and as a result, the accused often benefit from them by being found not guilty. The evidentiary value of such reports can be destroyed by the failure to transfer empty or fire arms to FSL, their delayed delivery, failure to maintain secure custody and transmission the case property, or the delay in recording witness statements in this respect.

Such reports are per se acceptable; nevertheless, if direct evidence is insufficient, they lose their significance because they only serve to corroborate direct evidence, which is viewed as best evidence in Pakistan. Oral testimony is considered as the best type of proof and other kind of evidence is not allowed to be used in place of it according to Articles 70 and 71 of the QSO. Besides,

for forensic reports, statements of the witnesses who took, maintained, or transferred the evidence is required in order to provide these reports the status of documented evidence.

Contrary to Article 128 of the QSO, 1984's conclusive presumption of legitimacy, forensic reports do not come with a conclusive presumption of veracity. This is due to the fact that they are intricately linked to the particulars of each case and there are numerous people and situations involved in putting an expert report on file as proof of a fact. They serve as documentary evidence that supports direct evidence and supports other types of evidence, including medical evidence.

Today, the admissibility of firearms reports as evidence in murder trials is decided on a case-by-case basis. The evidentiary validity and dependability of these reports are influenced by the standards utilized for evidence collection, transfer from the scene to its receiving at the lab, and reporting. As per Article 129-G of the QSO, courts may adopt an adverse presumption if there is any breach in the chain of secure possession and transmission, such as if a necessary witness's statement is not recorded or if he is not produced as a witness. Prosecution must prove in each case that the chain of custody was continuous, undeniable, secure, and safe before courts can rely on such expert opinions.

References

- Abdul Wahid And Others v. The State And Others, Criminal Appeal No. 230, Criminal Acquittal Appeal No. 237 and Criminal Revision No. 24 of 2019 (Balochistan High Court 04 30, 2020).
- Asif v. State, Cr. A. Nos. 214-J, 991 & 1183 & Cr. Rev. No. 835 of 2013 (Lahore High Court 12 07, 2020).
- Bashed Alias Chand etc v. State etc, Cr. A. No. 582-J & C.S.R. No. 03-T of 2016 (Lahore High Court 05 25, 2021).
- Financial Monitoring Unit*. (2001, 08 29). Retrieved 11 28, 2022, from www.fmu.gov.pk/docs/laws/Code_of_criminal_procedure_1898.pdf
- Garner, B. A. (2009). *BLACK'S LAW DICTIONARY*. Texas: Thomson Reuters.
- Ghulam Mustafa v. The state and other, Criminal Appeals Nos.132, 131 and Criminal Revision No,49 of 2009 (Peshawar High Court 12 04, 2013).
- Haris Son Of Aleem Ud Din, R/O Muhammad Zai Kohat v. Zahoor Khan Son Of Esmail, R/O Muhammad Zai, District Kohat, Cr. A. No.279-P/2021, Murder Reference No.8-P of 2021 (Peshawar High Court 03 22, 2022).
- Imran v. State, Cr. A. No. 455-J of 2018, Cr. A. No. 708, Cr. Rev. No. 291 & M.R. No. 101 of 2017 (Lahore High Court 11 02, 2020).
- Law Insider*. (2022, 06 26). Retrieved from <https://www.lawinsider.com/dictionary/forensic-report#:~:text=forensic%20report%20means%20a%20report,both%20e.g.%20an%20autopsy%20report>.
- Mahmood, M. (2019). *The Major Acts (Criminal)* (59th ed.). (M. A. Wali, Ed.) Lahore: Al-Qanoon Publishers. Retrieved 11 30, 2022
- Moulvi Taj Muhammad and 3 Others v.The State , Criminal Appeal No,316 of 2005 (Balochistan High Court 07 13, 2007).
- Muhammad Afzal v. The State and others, Criminal Appeal No,34-J and Murder Reference No,39 of 2012 (Lahore High Court 05 09, 2016).
- Muhammad Aslam and others v Khurshed Alia Bago and three others, Cr.Appeal No. 47 & 48 of 2000 ,Cr.Appeal No.47 & 48 OF 2002 (Federal Shariat Court 06 02, 2003).
- Muhammad Irfan v. the State, Cr.Appeal No.330 of 2006 and M.A.No 163 of 2008 (Sindh High Court 02 01, 2008).
- Muhammad Qasim v. State, Cr. A. No. 85097 & M.R No. 464 of 2017 (Lahore High Court 02 16, 2021).
- Muhammmad Haris Khan v. State etc, Cr. A. No. 31052 & M.R No. 332 of 2017 (Lahore High Court 11 19, 2020).
- Naseebullah and others v. The State through Prosecutor General Balochistan and others, Criminal Appeal No. 281 and Criminal Revision Petition No. 30 of 2019 (Balochistan High Court 12 23, 2019).
- Police Rules, 1934. (n.d.). 03, 695-745. Punjab Constabulary. Retrieved 12 17, 2022, from <https://punjabconstabulary.gov.pk/wp-content/uploads/2019/04/Punjab-Police-Rules-III.pdf>
- Punjab Police*. (n.d.). Retrieved 11 28, 2022, from www.punjabpolice.gov.pk/system/files/qanun-e-shahadat-order-1984.pdf

punjablaws. (2007, 10 30). Retrieved 11 29, 2022, from www.punjablaws.gov.pk: <http://punjablaws.gov.pk/laws/492.html>

Qaiser Nadeem v. The State, Etc, Criminal Appeal No.58-J of 2017 (Lahore High Court 04 17, 2019).
State Through Advocate General Khyber Pakhtunkhwa, Peshawar v. Sajid Munir, Cr.A. No.55-D/2017 (Peshawar High Court 06 27, 2022).

Truman, M. P. (2013). *Firearm Violence, 1993-2011*. (J. Thomas, Ed.) USA: U.S. Department of Justice Office of Justice Programs Bureau of Justice Statistics. Retrieved 12 15, 2022, from <https://bjs.ojp.gov/content/pub/pdf/fv9311.pdf>

Zeeshan @ Shani v. The State, Criminal Appeal No.499 of 2009 and Criminal Appeal No.477-T of 2006 (Supreme Court of Pakistan 12 26, 2011).

Zulfiqar Ali v. State etc, Cr. A. No. 1103-J of 2015 (Lahore High Court 04 16, 2019).