



The Right to Register an FIR: Foundation for Fair Trials in Pakistan

Tayyaba Batool^a, Muhammad Babar Shaheen^b, Muhammad Sulyman Akbar^{c*}, Muhammad Zahid Rafique Rana^d

Advocate High Court, Group Head Academics, Cornelius Group of Law Colleges Sargodha. Lecturer, College of Law, Government College University, Faisalabad. Lecturer, College of Law, Government College University Faisalabad. Assistant Professor, University Law College, University of Sargodha

*Email: msulymanakbar@gcuf.edu.pk

Abstract: The First Information Report (FIR) serves as the foundation for criminal trials. The Station House Officer(s) (SHO) of the investigation agency is under an obligation to promptly register an FIR whenever any information regarding the commission of a cognizable offence comes to their knowledge, whether orally or in writing. However, they often refuse to do so or delay its registration. Consequently, victims or informants must resort to courts against this action of SHO. This research paper deals with a very important legal question: whether an SHO can refuse or delay the registration of an FIR in a cognizable offence. It also explores whether an SHO can inquire into the truthfulness of the information without first registering it. This research concludes that SHOs have no discretion in this matter. The informant or victim has the right to register an FIR. This should be accepted by the investigation agency. They need to be trained. Its recognition should be unequivocally declared by police authorities through issuing necessary directions to SHOs. Online FIR system can be a vital solution. These steps are *sin qua non* to ensure fair trials in the criminal justice system (CJS) of Pakistan.

Keywords: First Information Report, Station House Officer, Criminal Justice System, Fair Trial, Cognizable Offence.

1. Introduction

The CJS in Pakistan is made up of different parts that work together to ensure a fair trial if the crime is reported. The police are the first part: the first line of defense. Their main role is to investigate reported occurrences. It also includes to arrest the offenders, to search and seizing case properties, and to complete the investigation reports. The police role starts with the FIR when someone reports an offence to them. Afterwards, the next participant engages in CJS: who is known as the prosecution service. Their main job is to guide the investigation agency, to scrutinize their investigation reports, to forward those reports to courts, to make the cases ready, and present them in court on behalf of the state. In the last comes the role of the judiciary: in our country it is like a ladder of courts and it ends with the Supreme Court of Pakistan. Their main job is to hear and trial criminal cases. They carefully appreciate the evidence and pronounce decisions on whether the accused is guilty or innocent. If they are found guilty, they receive the appropriate sentence from the courts (Khan, 2014).

In Pakistan, the CJS heavily relies on the police. They are the ones who start the process when an offence occurs. FIR outlines the crime scene and everything that happened. This becomes the basis of the next proceedings. Then their job of investigation begins. They carefully look into the place of occurrence: from there, they collect evidence including the ocular and circumstantial. Side by side, they also search for the accused, and if they find him, they arrest him (Jamshed et al., 2020). Furthermore, they also work very hard to maintain the peace. They patrol day and

night. They try to prevent the crime before it starts. Yet, they require reforms (Suddle, 2003).

An FIR works as a written document generated by the police upon their awareness of a cognizable offence (*Moni Mohan v. Emperor 1931*). It represents the initial information that reach to them regarding occurrence of crime. It is usually reported by the victim or their representatives. This reporting responsibility extends not only to the victim but also to witnesses and any person having knowledge about the incident. This includes the members of law enforcement agencies. This reporting can be happened either verbally or in writing. Besides, the essential components of an FIR consist of a cognizable offence, its form of submission (written or oral), and the requirement of the informer's signature. The police also required to make a note in the police daily diary. However, in cases which are classified as non-cognizable, police action in the form of FIR is prohibited (Khattar, 2023).

Basically, it is a report of information that arrives at the police first, that is why it was named as the first information report. Characteristically, it is a complaint which is filed by the victim of a cognizable offence or someone who is acting on his or her behalf. Its scope is wider. Anyone, including witnesses, can report a cognizable offence to the police orally, in writing, or even through any modern means or through telephonic call or a message. Registration of the information in the relevant register of FIRs promptly and without excuses is a primary duty of the police. Failure to register an FIR is considered an offence, although it is not implemented, yet it can lead to disciplinary action against the answerable police officer (CPDI, 2013). But it can be seen through analysis of case laws (*Arsalan Raza v. JOP 2024*) that police often refuse to register FIRs, and the victims then have to resort to available remedies provided in the Criminal Procedure Code (CrPC) for the registration of FIRs (*Safdar Hayat v. JOP 2022*). Resultantly, the backlog of cases increases, expenses for victims are added, and the right to a fair trial is disturbed. That is why this research aims to assert that the registration of FIR is essentially a right of the victim to ensure their fair trial in the CJS. Police, prosecution, and judiciary must play their active roles in safeguarding the fair trial rights of the victim, and FIR is the first step in this process.

This research is imperative because it sheds light on the importance of FIR in our CJS. Nowadays, FIRs are considered as the foundation for investigations and trials. Having knowledge of how it is being handled by investigation agencies and how it should be dealt with is vital to ensure fair trials in Pakistan. This research work provides very valuable insights into the role, efficiency and fair handling of FIRs in our CJS through examination of the procedural law, case-laws, and misconceptions which are existing in the police about them that they have discretion to refuse its registration and they can inquire into the facts before its registration. It also highlights the importance of its proper and prompt registration. Additionally, by exploring the responsibilities of a SHO in the context of fair trial right of the victims, this research aims to correct the concepts of investigation agency regarding registration of FIR and it's important in CJS. Thus, it will contribute to improve the enforcement of law. Overall, this study is important for enhancement of public trust in the police, prosecution and our CJS besides to ensure that victims may receive judicious and appropriate assistance from investigation agencies.

1.1 Research Question and Sub-Questions

The following research questions guide this study and exploration into the right to register an FIR and its significance within the CJS of Pakistan:

- a) To what extent does the current practice of registration of FIRs in our country impede the right to a fair trial within the CJS?

1.1.1 Sub Questions

Following are the sub-questions to explore the topic:

- a) What are the legal obligations of a SHO about the registration of FIR in Pakistan, as have been outlined in the CrPC and interpreted in the relevant case law?
- b) Do existing legal provisions have provided sufficient clarity about the right to register an FIR?
- c) What are the primary reasons that SHOs often refuse or delay in registration of FIRs in Pakistan?
- d) How do these practices impact the ability of victims' right to fair trial within the CJS?
- e) What legal, procedural, administrative or interpretative reforms could be implemented to ensure the prompt and proper registration of FIRs in Pakistan?

2. Research Methodology

This research will explore the legal right of the victim in the context of fair trial to register a FIR and its vital role in the CJS of Pakistan. To achieve this, the study will employ a multi-faceted approach. In legal research, this approach means looking at the law from different angles. This is important because the law is complex. It depends on statutes, case laws, and experts' legal writings. Through the study of available legal documents, reports, conference papers, books, case-laws, and through their analysis, one may get a deeper understanding about possible issues in the field of law.

In this study, firstly, we will examine the relevant legal provisions available in CrPC with the help of landmark and key case laws. Subsequently, a critical analysis will be conducted to understand the legal framework and to identify the potential gap between law and practice. To end, prevailing academic research on our subject i.e. FIRs will be reviewed to gain a much broader perspectives. Then research for making registration of FIR as a right in the context of fair trial right in the Pakistani CJS will be made. This work aims to provide a clear picture of the right to register an FIR and its practical implication to ensure fair trials in Pakistan.

3. The Right to Register an FIR: Legal Framework

This research aims to explore the right to register FIR and its legal framework. To gain a well-rounded thoughtful comprehension, we will analyze case laws from both the India and the Pakistan. The reason is that their shared legal heritage which they adopted and the similar procedural laws, after independence, make them an ideal position for us to make a comparative analysis. Through the examination of the FIR-related cases in both countries, we will be able to achieve a deeper understanding of the right to FIR. Additionally, a comparative approach will allow us to see how different legal systems, though similar in nature, take this right within their own specific contexts. It will offer very valuable insights for us. This research intentionally chooses the legal similarities between India and Pakistan in order to create a comprehensive picture of the right to register an FIR and its legal foundations.

3.1 Indian Case Laws

The provision of law which deals with our subject is section 154 CrPC. The stipulations outlined by this provision maintained that it is obligatory. The use of the word "shall" reflect the legislative intent in this matter. The courts are of unanimous in opinion that a police officer has no choice but to register an FIR (*B. Premanand and Ors. V. Mohan Koikal and Others 2011*). Additional focus can be placed, in this regard, on the wording of Section 154 of the CrPC, which indicates that it only word which has been referred in that provision is the 'information' and it is without addition of any qualifiers like 'reasonable' or 'credible' (*Ganesh Bhavan Patel and Another v. The State of Maharashtra 1978*). The principle is straightforward: whenever information regarding the commission of a cognizable offence is received, the officer in charge of the police station is obligated to record it (*H.N. Rishbud and Inder Singh v. The State of Delhi 1955*).

The law is that if a SHO, who is also an officer in charge of a police station, receives any information which indicates a cognizable offence and which also meets the requirements of Section 154, then that officer is required to record the details of the same in the prescribed format and register a case. The essence of the above-mentioned legal provision is that if that officer suspects that a cognizable offence has been committed, then he must either conduct an investigation by himself or he must assign it to any of his subordinate. If the officer finds no sufficient reason to investigate, then they can choose not to pursue the investigation. The scope of investigating in cognizable offences is solely within the jurisdiction of the investigation agencies. The courts of law do not have any authority to interfere in it, as long as the investigation adheres to the relevant provisions of law and legal principles enunciated by the higher courts of law. The law, therefore, give power to a Magistrate so that he can intervene and direct an investigation in a case when the police officer decides not to investigate the offence (*State Of Haryana And Ors v. Ch. Bhajan Lal And Ors 1992*).

Though there are some views that police can inquire into the truthfulness of cases before registering a FIR. This happens in a court case, wherein an inquiring officer pursued an investigation with such zeal and vigor that he even enquired into and took down statements of persons believed to have been acquainted with the facts of the case before registering a case. The court upheld the inquiry. The inquiring officer, who was a high-ranking police officer, surprisingly overlooked or deliberately overstepped the limits of investigation contained in Chapter XIV of CrPC. The court held that the delay on the part of the investigating officer in registering the FIR was an irregularity. The court upheld the inquiry (*P. Sirajuddin etc v. The State of Madras 1971*). Often the police officers sought help from such like cases. These views are incorrect.

In a landmark case, a question arose before the court: whether a police officer is bound to register a FIR under the

law of CrPC, or whether he has the power to conduct a preliminary inquiry to test the veracity of such information before its registration. The court then made a historically based review of the versions of the CrPC from 1861, 1872, 1882, and 1898, (and then the Indian 1973). All reveals a consistent emphasis on the subject regrading registration of information about cognizable offences within a police station. And the analysis of these versions highlights the same core principle: whenever a complaint regarding a cognizable offence is lodged, either verbally or in writing, the officer in charge of the station is mandated to record the details, in the form prescribed by the governments. Though the specific format and required information have undergone some minor modifications over the time, as it was evidenced by the variations in wordings between CrPC versions, however, the underlying principle about the maintenance of and recording of cognizable offences remains constant throughout this historical period. This consistency suggests the importance of having a formal and mandatory record of these offences. And the question was answered as follows: The essential condition for recording an FIR under 154 is only that there must be an information which reveals a cognizable offence and nothing more. If the information is satisfying this requirement and the same is presented to an officer in charge of a police station, then that officer has no other choice but to enter the substance of the information in the prescribed form—essentially, to register a case based on that information. Thus, it can be concluded that the section 154 of the CrPC is mandatory. The officer concerned is duty-bound to register the case on the basis of the information unveiling a cognizable offence. The plain words of Section 154(1) must be interpreted literally. The word "shall" in this context indicates a mandatory obligation (*Lalita Kumari v. Govt. Of U.P. 2014*).

The courts follow the primary principle of interpretation: which is the literal rule. Other methods of interpretation, such as the mischief rule or purposive interpretation, are only used when the plain language of a statute is unclear, and when the language leads to no coherent results, or when the language would contradict the purpose and intent of the statute. But when the words of a statute are clear and unambiguous, then its interpretation must adhere strictly to the literal meaning, and it should be without resorting to other interpretative principles (*Swedish Match AB v. SEBI 2004*). Therefore, the language of above referred provision of law allows for no interpretation other than the literal rule. And by following this interpretation, it can be concluded that during the process of registration of a crime or a case on the basis of an information which reveals a cognizable offence, in accordance with Section 154 of CrPC, the responsible police officer cannot inquire into the reliability or authenticity of the information which was provided to him by the informant. They cannot refuse to register the case on the grounds of information being unreliable or credible. Instead, the officer in charge of the police station is legally obligated to register the case; afterwards, he can proceed with the investigation (*Lalita Kumari v. Govt. Of U.P. 2014*).

4. Pakistani Case Laws

In a case involving wrongful restraint with common intention, where the accused petitioned the High Court to annul the order for registration of FIR, the court ruled that in any cognizable offence, the registration of the case is a citizen's right, because he has the right to seek assistance from state authorities. This right is safeguarded under Section 154 of the CrPC. It is now a mandatory provision. The SHO had no authority to deny the case registration. Further, the court observed that it is also noteworthy that any police officer or public servant who knowingly disobeys a lawful direction, in this case for registration of FIR, can be prosecuted and penalized under Section 166 of the PPC. Therefore, order directing registration of an FIR is a lawful one that must be followed (*Naseer Ahmad v. JOP 2018*).

In another instance, where the Petitioner challenged the decision of the Ex-officio Justice of Peace who had dismissed his application for registration of FIR. The petitioner claimed that the respondent had failed to pay a certain amount and had assaulted him with the assistance of other respondents. The court noted that the Justice of Peace had not considered the medical certificate and had instructed the petitioner to pursue a civil remedy, even though there was no restriction in the law on the subject of seeking both criminal and civil remedies. The court observed that the Ex-officio Justice of Peace should not have outrightly rejected the possibility of a civil dispute leading to a cognizable offence. The High Court overturned the challenged decision and instructed the SHO to record the petitioner's statement. Regarding our topic, the court held that Section 154 of the CrPC outlines a highly efficient method for initiating a criminal proceeding vis-à-vis cognizable offences. This section mandates that the details of any information regarding the commission of a cognizable offence provided to a police officer, who is in charge of the station, must be accurately recorded by him in a prescribed book of the government. The law further requires that upon receiving such information, the officer must promptly report it to the empowered Magistrate. Further he must also take necessary actions to locate and apprehend the offender. Even, if the officer deems that

there are insufficient grounds for an investigation, they may opt not to proceed that too after recording the reasons. However, they cannot refuse to record the substance of the information in the prescribed book. Section 154 of the CrPC thus commands the officer to register a case upon reception of a description of a cognizable offence; irrespective of its accuracy and credibility (*Ghulam Qambar v. The State 2019*).

In another legal case, the Petitioner contested the directions given by the Ex-Officio Justice of Peace to the SHO for an FIR against the petitioner. The court ruled that when someone reports a cognizable offence, the SHO of the relevant Police Station must register an FIR. This is the mandate of Section 154 of the CrPC. It was emphasized by the court that under this law, the police is obliged to register the case without the need for prior inquiry into the accuracy of the information that has been received. The court found no legal basis, in the law, for the SHO to verify the truthfulness of the information before recording the same (*Tariq Shafi v. Province of Sindh 2020*).

Similarly, in another case, wherein the Petitioner was dissatisfied with the directions from the Ex-Officio Justice of Peace to the SHO of the relevant police station to register an FIR against the Petitioner for issuing a dishonored cheque at the bank. The court ruled that since the cheque was issued for an obligation but was dishonored upon presentation, any application detailing such an incident should be dealt with in accordance with the Section 154 of the CrPC. Consequently, the constitutional petition was dismissed by the court. Furthermore, about Section 154 the court held that the usage of the words "shall" and "information" carries significant implications in the eye of law. The word "shall," denotes a mandatory requirement, it reflects the original legislative intent, and it leaves no room for the subjective or even the objective discretion by the police officer. This strict statutory provision renders the mechanism as a self-executing. Since the term "information" is not qualified by terms like "reasonable," "credible," or "truthful", therefore, SHO lacks any discretion or authority to verify the accuracy of any kind of such information before taking action upon it in accordance with the intent of section 154. Thus, it is legally impermissible for a police officer to interpret the provision to include terms like "preliminary inquiry" or "prior hearing" before registration of an FIR (*Dawood Abdul Ghaffoor v. JOP 2021*).

4.1 The Right to a Fair Trial: Impact of Non-Registration of FIR

The failure to register a FIR can deeply impact the right to a fair trial. An FIR serves as the cornerstone of criminal proceedings (*Muhammad Ashraf v. The State 2016*): it records all vital details of the alleged occurrence and offence as are required for initiating a formal investigation. Without it, the preservation of evidence is mostly compromised, eventually, it hinders the victim's ability to build a strong case and that is how it violates their right to due process. Moreover, the absence of an FIR mostly cause delay in other legal proceedings (Begum, 2023). It also gives benefit to the accused to obtain bail. Furthermore, this lack of official documentation also creates problems that in the long run weaken the legal case of the victim. It hinders the effective investigation. It left the victim with feelings of being unheard and powerless. And after an inquiry it loses its value (*Mst. Asia Bibi v. The State 2019*).

Firstly, an FIR contributes as the foundation of any criminal investigation (*Rehmat Ullah v. The State 2018*). It captures the initial details of the crime scene. Without it, this key information will remain unrecorded (Vaidya & Raghuvanshi, 2010). It is a fact that with the passage of time, memories fade, sometime witnesses also relocate, and in some instances physical evidence can also depreciate. This loss of weakens the prosecution ability to build a strong case. Secondly, a registered FIR initiates the official investigation process. Law enforcement agencies can begin collection of evidence: it includes identification of suspects, and their arrest before they may disappear or tamper with crucial evidence of the case. The absence of an FIR delays this process. It gives criminals a head start. Finally, the non-registration of an FIR also has a psychological impact on the victim. The FIR empowers the victim because it signifies to him or her that the legal process is initiated. When an FIR is not registered, it can send a message to the victim that their case is not so important or it lacks merit. This can be emotionally devastating for them. The victim may build a distrust against investigation agencies within his heart.

The object and significance of the FIR in a criminal case cannot be ignored (Ahmad et al., 2020). It serves as a crucial piece of evidence because it is essential for corroboration of the oral and eyewitness testimonies which are presented during the trial before the courts of law. The importance of the FIR, especially from the perspective of the victim, cannot be underestimated. The purpose of promptly lodging the report with the police, subsequent the commission of an offence, is to swiftly gather information about the circumstances nearby the crime scene. It helps in identification of the actual offenders and their roles Any delay in the FIR often suggests that it may have been concocted after the fact; thus, delay undermines its credibility and reliability (*Liaqat ali v. The State 2008*).

5. Solutions and Recommendations

This research highlights the vital role that registration of an FIR plays in ensuring fair trial rights of victims within our CJS. Though, it is mandatory, yet victims often face hurdles due to refusal of SHOs in its registration or due to delay in it. To tackle this issue, firstly, we need to strengthen the legal framework through legislative amendments and standardized FIR forms that can eliminate ambiguities and that can minimize room for discretion by SHOs. Secondly, through enhancement of police accountability and through the usage of disciplinary actions, with an independent oversight mechanism, we can deter wrongful and unlawful refusals. We need their accountability (Bibi et al., 2023; Warraich, 2004). Moreover, public awareness campaigns and training of law enforcement agencies along with all stake holders of CJS jointly and independently can further improve our understanding about the rights and procedures relating to FIR. Furthermore, we also can move towards an online FIR registration system (Mahadik et al., 2024). It will maintain a digital recordkeeping facility and it will streamline the process. It will also enhance the record integrity. Moreover, police higher-ups must issue necessary directions through a standing order to all SHOs to promptly register an FIR whenever required. Through the implementation of these solutions and recommendations, we can tackle the issue of delay in registration of criminal cases and we can enhance our understandings about the rights of victim. All we need is a more efficient, transparent, and equitable CJS. Time has come that the SHOs need to recognize that registration of FIR is compulsory, however, immediate arrest of the accused its registration is not obligatory. Registration and the arrest are distinct concepts in law, and there are numerous safeguards available against an unwarranted arrest. Yet, it is completely inaccurate to assume that the mere registration of an FIR automatically warrants the immediate arrest of the accused. The apprehension that merely registering an FIR will result in the immediate arrest of the accused, potentially damaging their reputation, is totally unfounded. We should not allow that such a misconception may persist and we should uphold the mandatory nature of its registration in order to prevent any inconvenience that may cause to victims. The solution lies in strict enforcement of safeguards available against arbitrary arrests by the police rather than to allow them to avoid the mandatory registration of FIR when a cognizable offence is reported (*Joginder Kumar v. The State of U.P. & Ors. 1994*).

6. Conclusion

This research basically highlights the important role of registration of FIR as the cornerstone to ensure fair trials rights of the victim within Pakistan's CJS. Although it is mandatory in cognizable offences, yet victims frequently face barriers due to refusals or delays caused by SHOs. These findings evidently establish that SHOs lack any discretionary authority to hinder this process. The informant or victim's right to register an FIR must be unequivocally recognized by them. To address these challenges, there are several solutions and recommendations that have been proposed in this study. Establishment of a strong legal framework through legislative amendments and standardized FIR forms can eliminate ambiguities and minimize room for the SHOs to misuse their discretion. Further, enhancement of police accountability through disciplinary actions, besides with an independent oversight mechanisms, and public awareness campaigns can also deter unlawful refusals and it can improve all stake holders understandings of FIR-related rights and procedures. Additionally, implementation of an online FIR registration system can also streamline this process, with maintenance of digital records, and the enhance record integrity. The research concludes that police authorities must issue clear directions to SHOs by emphasizing in their orders that the registration of FIRs are the mandatory and it should be a prompt act. Furthermore, it is also imperative for SHOs to understand that FIR registration does not necessitate the immediate arrest of the accused. False registration can be tackled through implementation of penal provisions. Through implementation of these recommendations, Pakistan can achieve a more efficient, transparent, and equitable CJS. This will not only uphold the rights of victims who have suffered but it will also reinforce the rule of law and will ensure fair trials and justice for all parties involved.

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