



RESEARCH PAPER

Identification Parade: A Critical Analysis of Pre and Post-Identification Modern Methods and Technology in Pakistan

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ABSTRACT

When an offense is committed by unknown persons one of the biggest tasks for investigating agencies is to find the real culprits through different techniques. Identification is the most important part of criminal law, as it identifies any person or thing. An identification parade is used to find out a person who is unknown and involved in any criminal activity. This procedure is used all over the world to identify the real offender of a crime. In Pakistan, this is widely used to identify the criminals. To provide justice and equality in a society, following the proper laws and upgrading them according to the modern period is highly important. It is highlighted in this paper, whether these methods are adequate in this modern era when the offender uses the latest technologies and gadgets while committing the offense. This research paper will focus on pre-identification methods such as digital line-up, photographic identification, geofencing, and video identification and post-identification methods including IRIS scan, DNA, fingerprint comparison, and facial recognition technology have enhanced the reliability of the identification and their reliability, effectiveness, and potential for improving justice outcomes and what types of amendments are required in statutes to make them more efficient.

KEYWORDS Evidentiary Value, Eyewitness, Fair Trial, Identification Parade

Introduction

This method is considered the oldest surviving method regarding identification. Identification parade is known as an important part of criminal proceedings in Pakistan as well as all over the world as it has been used since the old times. It was started in the 18th century in Europe with the procedure before it was just an informal kind of method which has been practiced without any kind of criteria. It performs the double-edge method because it works to identify the real suspect first and secondly, it also explores the credibility of witnesses (Shepherd et al.,1982).

In the primitive period, this process is known as the “lineup method” in Europe. This method is widely used by police authorities and another name for this method is also “police lineup”. As we know this has been the oldest surviving method since the primordial time and it has been developed over centuries to become an important ingredient of the criminal investigation system in the whole world.

This method has lost its credibility in modern times because there are massive and horrendous issues due to which many innocents have been trapped and sent to jail. Now, in developed countries, this method has been used in very rare cases along with modern techniques just to check the credibility of the witnesses. Developed states like the UK, Canada, and the USA have developed their laws regarding the process of identification. On the other side in Pakistan, this method is commonly used and the results of this method are not satisfactory. It has been considered a method of ensnared instead of identification. Sometimes, this method is used for the horrendous motives of illegal detention and it was

estimated that since 2015, 3200 illegal arrests have been reported only in Punjab Pakistan (Khan, 2019). Moreover, this has been mostly reported in the countryside areas.

Identification parade is a test method to identify the person who is accused of any crime, to identify the real culprit this method is used. But this method is only effective when there are proper checks and balances during the identification parade otherwise the result is not useful or its evidentiary value is not up to mark in court proceedings.

In terms of the judicial system, Pakistan still adheres to primitive period laws. The judiciary and all other apparatus followed the prescribed pattern in the statutes. Our legal system is still based on ancient legal values, even though we are living in the postmodern era. We must evolve with the times to achieve better results. Many changes have been made in the last few years, but there are still a large number of challenges.

In the modern era, there are many other ways to identify the culprits, but in Pakistan, this technique is massively used. Many ambiguities are still present because police and other investigating agencies are not paying proper attention to conduct this test fairly. In this regard, many innocent people are trapped or many witnesses cannot be able to identify the real culprit because of mala fide intention and defective technique. From time to time the superior courts in Pakistan interpret the evidentiary value of identification parade and provide guidelines for the conduct of identification parade. The investigation officer must conceal the identity and faces of culprits till the time of the identification parade and the concerned magistrate takes all precaution as per law while conducting the identification parade.

According to Mr. Justice Khalil ur Rehman Ramday, an identification parade is an important test because it puts both the criminal's and the police's credibility to the test; however, in Pakistan or the sub-continent, most of the time tests are just a formality because witnesses already know who the criminal is or the police are involved because their faces are shown to the witnesses. This has an impact on both the innocent and the original offender. So, in this case, Justice Khalil ur Rehman Ramday provides some guidance for police, stating that it is the legal as well as moral duty of the duty officer to take precautions after arresting the accused; and that if the accused's faces are shown, the test is worth less (Muhammad Yaqoob vs The State, 1989).

In another case law, the High Court has provided the guidelines for the conduct of this test. In this regard, it is also stated by the honorable court that this test is not valid until strong corroboration or evidence is present against the accused. In Pakistan most of the time it is conducted in the police station which results as a poor piece of evidence. In recent case law it is pointed out that there is no specific place for the conduct of the identification parade but the necessary is to conduct it in a proper form and in the presence of the magistrate (Walayat vs The State. 2008).

In modern times, there is a need for scientific investigation and the latest technologies to meet the present time because the world has progressed a lot. The criminals are also using the latest techniques and equipment to commit a crime. Now, there is a need for new technology and modern investigation techniques to avoid any inconvenience. In this regard, other modern methods related to the identification parade and new scientific technology are required. Now law enforcement departments have been using modern technology all over the world to trace criminals and absconders.

Different investigating agencies in Pakistan have done much work on modern technology and techniques to identify absconders and criminals. It is considered a positive sign but still, many challenges are there and strong substantiation and strong evidence are necessary to avoid the victimization of innocent. Because the identification parade is a double-edged weapon. (111)

In other developed states especially in Europe, laws are excellently amended which explains step-by-step procedures regarding line-up methods for the identification of culprits. Modern technology with the line-up method provides huge strength to the line-up method.

The line-up method with modern technology and techniques has been introduced by states like the UK, the USA, and Canada to avoid false and error-free identification of suspects. Currently, in Pakistan modern technology has been used to find the suspects and this has a great success rate but still, there are some issues like proper training of investigating officers and lack of resources. Even we cannot rule out the presence of victimization of innocents by police while using this method.

Modern methods and new technologies of identification are needed for the current era. Because mostly, the criminals have muffled faces and they have done the homework to hide their identity and eliminate the evidence while committing the offense. To counter these culprits, new methods and modern technology are highly necessary for justice in society and for the penalization of offenders. It will be helpful for the authorities to tackle the real offenders in society and help to minimize the crime rate.

In modern times, there are horrendous crimes and the identification of persons and things is the first step towards the investigation. It should be done on a priority basis with merit and worth. Because, if its result is not positive, it will lead investigations and other processes toward negative and false results.

This method has been used widely since primitive times to identify the unknown suspect. In Pakistan whenever there is a need for identification of any suspect identification parade is used to identify the unknown offender with the help of eyewitnesses. In the developed states, this method has lost its credibility and it has been considered inadequate and insufficient because now at present, there is a need for modern methods and technology to avoid any mistakes and false identification. It has been reported that this method is used for tyranny against the innocent one, moreover, it is massive unsafe because their results are not reliable regarding its admissibility. The developed countries have done proper legislation on this issue and upgraded their laws regarding the identification is concerned. Identification parade is considered an essential tool in Pakistan to identify suspects but doubt is always there. To reduce doubt and tyranny against the innocents, modern technology and other methods are necessary to strengthen this method.

Literature Review

The provisions of Article 22 read with Article 164 of the Qanun e Shahadat Order, 1984 deal with the identification parade. When the identity of a person is in question all the facts that establish the identity of that person are relevant, e.g. age, height, complexion, voice, handwriting, distinctive marks, or peculiarities. The identification parades are held by the police in the course of their investigations to enable witnesses to identify the property which is the subject matter of the offense or to identify the person who is concerned in the offense. By Article 22 facts which establish the identity of any person or thing whose identity is relevant, are relevant in so far as they are necessary for that purpose. Otherwise, the identification by itself has no independent value (Iqbal, 2021).

Article 164 permits the presiding officer of a court to allow the evidence that has become available because of modern devices. With the development of science and technology since coming into force of the repealed Act of 1872, it has become necessary that modern devices or techniques should find their place in proof of fact (Iqbal, 2021).

Due to advancements in technology and modern devices, the identification method become an old technique with its own merits and demerits. If the precautions mentioned in

laws and rules were not adopted the evidentiary value of such identification is not recognized by the courts of the law. Due to modern techniques, it is considered an outdated method. Still, the case law study revealed that it has value in evidence and it became a relevant fact that required further evidence for corroboration. Furthermore, the joint identification parade of the accused is not recognized by law and it has no value in the eye of the law (Mehboob vs Akhtar, 2024)

Another limit is fixed by the superior courts on this method, that is whether the witnesses identifying the culprits are competent witnesses as per law. Article 17 of the Qanun e Shahadat Order deals with the competency of witnesses. A four-year-old minor child is not a competent witness for the identification parade of the accused persons (Farrukh vs State, 2024)

The main source of identification parade laws in Pakistan is "Police Rules, 1934". It provides the road map of the identification parade procedure. In the whole sub-continent, this rule has been followed by the court to conduct the identification parade to find out the real culprit. It discussed the duty of the magistrate and the other officials who were there at the time of the execution of this process. All guidelines are explained in detail in the rules. Furthermore, these guidelines are just for the conduction of this process. The identification parade under the supervision of the magistrate is legal but the important thing is the privacy of the accused. It is the prime duty of the police or any other law enforcement agency that when they arrest any accused, immediately hide his identity by putting on a cloth or any other thing on his face. He should not bring before the complainant or his witnesses, or publicly. Unfortunately, the police department forgot their primary duty, and now they use to publicize the arrested person on different social media platforms to show their performance. In all such cases, the identification of an accused became a question mark.

During the identification parade, the age of witnesses and their psychological behavior is also important. It is noticed in some cases that at the time of the commission of the offense, the old people were in great trauma. It has been difficult for them to recall the entire scenario, on the other side young ones can overcome this situation. For eyewitnesses, both types of people are not reliable because during the incident their mental level is in strange condition. So, after the identification of culprits, corroboration from any other independent evidence is required in all such cases.

In the "Quagmire of Identity", the author examines the benefits and drawbacks of identification parades. The inquiry procedure in the subcontinent is extremely slow and fraught with uncertainty. The most crucial finding of this study is that the majority of identification tests have been conducted without competent authority. To prevent making a mistaken decision, the responsible authorities should proceed with a further inquiry if there is any uncertainty or doubt regarding the validity of the identification. The author further highlights that this test only has value when it is carried out under the provisions of the laws and it is necessary to conduct with legal representatives of both sides otherwise, the outcome will be heavily biased (Malhotra, 2016).

The Modern era brings much change in the life with passage of time now criminals have different new methods to complete their horrendous motives. In this regard, the identification parade method is not sufficient to find the original offender. The author's findings are hugely valuable regarding the method of identification from the perspective of the modern era. Identification parade has been considered as a most commonly used practice but improvement and reformation are necessary with change of time. Moreover, the laws regarding identification must be amended according to the needs of the day. He has discussed the mechanism of the identification process according to the needs of the time (Valentine, 2015).

All over the world, this method is commonly used in criminal cases. In this research work, we have examined the importance of this process and its admissibility in the court as proper evidence. This method is merely a test to help the court in finding out the real offender. In heinous crimes, the trial court has to examine witnesses in all aspects whether they are true or not. Furthermore, research also explores that to identify and put a person behind bars on behalf of this method is unsafe and against the principles of natural justice and fair trial when there is no other independent evidence available. Moreover, in the cases of capital punishment, the court be more vigilant to find out the real one and the innocent will be saved from this kind of tyranny and it is considered a massive unsafe (Cutler, 1995).

During any incident of criminal activity the memory and cognitive behavior of the human mind are very important because after the arrest of the accused witnesses have to recognize him and must identify the role that has been attributed to him in the FIR. It is important to mention here that offenses in which the accused use face masks or cover their faces are a challenge for this method. Furthermore, offenses committed in the dark or at the time of night when no light is available are another hurdle in this method and finally, the evidentiary value of such identification parade lost its worth. In case of any doubt, the benefits go to the accused (Mullazim vs State, 2021). The memory and cognitive behavior of witnesses have significance because, during the trial in the court, it is important to know about every aspect of the incident otherwise doubt will be in favor of the accused. It explores that the identification parade is not safe enough and should not be used as a conclusive piece of evidence (Stebly, 2016).

According to the case law identification merely is a matter of check and balance. In Pakistan, this technique has been used for a long time without proper caution. Delay in the identification parade is an important ground to create illegality and it lost evidentiary value. Furthermore, the court addressed that for a long period accused were put in jail or a private torture cell of the police station in the name of the identification parade. Poor and illiterate become the victims of this oppression and cruelty. The honorable higher courts interpret in many judgments that it is illegal to delay the legal process of identification otherwise it would be worthless as a matter of evidence (Abdullah vs State, 1999).

Mr. Justice Khalil ur Rehman Ramday states that the identification parade is an important process during the investigation. He emphasized the right way of this process and ordered proper attention and caution while conducting this process. The superior courts were often interpreted and showed serious concerns regarding the conduction of the identification parade without taking measures to avoid ambiguity and mistakes.

This method is considered an integral part of examination and investigation in the criminal justice system in Pakistan when the accused are unknown it has been used since the primitive period all over the world. In the light of the above discussion in all case laws and different articles, this has been observed that this method is still alive in this modern period but it lost its credibility in this era due to modern techniques and new technologies.

Methodology

This research is about the identification parade and other modern identification methods and the latest technology. We use qualitative data to complete this research work. As we collect data from books, research articles, and precedents, we follow the discussion method to analyze this research work because this method fulfills the requirements of our research and it also helps us to explore all the dimensions regarding our problem statement.

Results

Identification parade is the oldest identity test which has been used for a long time all over the world. If this has been done with proper vigilance and care it will clear the way

towards truth but it is also considered lethal when there is an error while practicing it, but with the help of modern techniques, upgraded laws, and new technology we can avoid any kind of inconvenience.

In the present scenario, there is a need for fast scientific investigations and modern technology to tackle the current justice system. This method is just considered an act of prudence, in this regard this test is incomplete and there is a need for modern technology to make it stronger and foolproof to avoid any kind of inconvenience and nuisance for the innocent. To tackle and overcome the deficiencies of this method use of modern technology is required along with it. Now law enforcement departments all over the world have been using modern technology to cope with offenders and criminals.

As an underdeveloped state, Pakistan is suffering from economic and political crises. The result is that laws are not upgraded according to the needs of the day. After independence, Pakistan adopted the Evidence Act 1872 and in 1984 they replaced it with the Qanun e Shahadat order 1984. The basic infrastructure of both statutes was the same. The new statute did not prove as a new and latest piece of rules and regulation. In the year 2007 a new law, the Punjab Forensic Science Agency Act was passed and the forensic lab started its proper work in 2009. This was a great milestone achieved by the government of the province of the Punjab. Now it is a very easy task for investigating agencies and trial courts to corroborate the evidence of witnesses during the identification parade with other scientific pieces of evidence, opinions of experts, and circumstantial evidence. In the beginning, there were limitations due to a small number of equipment but now the Punjab Forensic Lab has enhanced its ability. It is considered a positive sign but still, many challenges are there and strong corroboration is necessary to avoid the victimization of innocent.

In India still, the Evidence Act 1872 is enforced but the Supreme Court of India interprets the evidentiary value of the identification parade in many cases exclusively and the legislative body amends this Act according to requirements of the present era. Where the court has to know the identity of any person, any fact that establishes such identity is relevant. The identity of a person can be established by the evidence of a persons who know him. Apart from direct evidence, the circumstances of the situation may also be relevant to prove an identity. The Supreme Court of India has observed that the identification of the accused either at the test identification parade or in the court is not a *sin qua non* for his conviction. The commission of crime by a particular person can also be proved by circumstantial evidence (Singh, 2010)

In developed countries especially the UK, Canada, and the USA at the local level laws are excellently amended with step-by-step procedures regarding the identification and the line-up method. These states not only rely upon these methods blindly but use modern techniques as well to minimize the danger of any error or mistake. Modern technologies with line-up methods provide huge strength to the identification parade.

Line-up with modern technology was introduced by the United Kingdom just to avoid false and error-free identification of suspects. The "Code PACE D" is considered a champion of this modern technology which tells about every aspect of the law regarding different processes of identification and most importantly the identification parade (Britain, 2002).

Importance of pre and post-identification methods

In Pakistan nowadays it is enormously important to introduce the pre- and post-identification methods with the identification parade because in Pakistan newly amended laws related to identification are not present and it is necessary to work on the already

present pre- and post-methods of identification parade. In Pakistan to make it more effective in favor of justice and public interest instead of tyranny and oppression.

Modern Technology and Other Methods Identification Parade

Modern technology and modern methods are very necessary because now criminals have many channels to change their identification. It is an era of science and technology and it is the demand of time that laws should be amended according to the modern world that can tackle heinous crimes and the offender must be behind bars for their actions. Identification parade is considered an unsafe method in the modern era. In under-developing countries there are many challenges regarding no upgradation of laws and the procedures are also faulty in this regard. In Pakistan, now some modern methods and technology are introduced for accuracy and good results. The following guidelines and precautionary are provided by laws and case laws of higher courts for the conduct of the identification parade.

- It should be held in the presence of the Magistrate
- The accused and all other dummies should be without handcuffs
- At least ten dummies of the same age and build were present
- Name, parentage, and addresses of all dummies were recorded
- Accused can stand at any number in line with dummies
- Witnesses were not allowed the opportunity to see the accused before the identification parade.
- The Magistrate has endorsed the above precautions on the memorandum of the identification parade
- The date, time, and place of the identification parade be noted
- FIR No., sections of laws and name of the police station be noted
- Name, parentage, and address of witnesses be noted
- At a time only one witness will try to identify the accused and after the completion of his term, he will be moved to a separate room so that he cannot inform anything to other witnesses.
- Before coming to the next witness, the accused can change his position in line

At the local level in Pakistan currently, closed circuit television cameras (CCTV) are used to track criminals and it is greatly helpful to check the incident and fix the responsibility that who is responsible for the incident. In this way now police department must take help from the cameras for identification of the unknown persons. It aims to provide a clear clue as well as the whole incident which is required for investigation.

Video Technology and identification

In Pakistan, video identification is considered a modern technique and admissible in the court after the report of forensics regarding its genuineness and originality. Video identification is simply carried out by the witness under the supervision of the police and no other mechanism has been present in rules and regulations regarding the process of video identification. The process of photo identification deals with the forensic department in Pakistan and this procedure is adopted with the permission of the court but no proper law or other guideline is present so far. The identification of an accused from photographs is itself not a conclusive piece of evidence unless and until the person who captured the photograph appears in court and corroborates it. If the photograph is captured by a camera in which negative film is used the production of negatives is equally important (Singh, 2010).

Pakistan has converted its dimension towards modern devices and technology but there are need for proper rules and regulations and upgradation of laws. Video technology and proper procedures have been followed all over the world to conduct the identification parade in the right way. Moreover, in developed countries, there is a proper mechanism to meet justice. just like in the United Kingdom, they have introduced "Code D" to tackle all kinds of pre and post-identification methods to tackle it (Home, 2017).

IRIS Identification

Iris identification is not a new technique but considered as latest one because it has been introduced very late in investigations. Now it is considered as the latest technology that has been used for the identification of any of the suspects. Iris identification is an automated biometric identification technique that analyses distinctive patterns in the ring-shaped area around each eye's pupil. In the United Kingdom, this method has been used since 2004. First, it was just used for immigrants at airports and after that, it was used to identify the unknown suspect.

On the other side in Pakistan, this technology was very rarely used in airports only, but now it has become an essential part of identity after its introduction by NADRA. After the incident of 9 May 2023 government has been working on it to enhance this technology. Many of the culprits have been identified by this method during the investigation. Now it has great worth in the field of identification. NADRA is working to upgrade the national database not only for Pakistani citizens but also for Afghan refugees residing in Pakistan. Furthermore, with the use of this technology, approximately 900 suspects have been identified in different riots and illegal anti-state activities in Pakistan in 2023 (Macdonald, 2023).

Geo-Fencing as a Pre-Identification Parade

Geo-fencing has been considered the modern and latest technique to check the location of the person but it is considered as the most complex method. It has been exclusively used in the present era. This method has been widely used for the location of unidentified suspects and it has been used to make a strong case against the suspect and it is considered a pre-identification parade technique.

Furthermore, the main challenge of this technique is that it only covers the area and does not provide the proper location of the targeted suspect but it only provides the location with the help of mobile phone service signals. It has been recorded many times during the data collection of suspects many other innocent people will be affected by this method and become the victim of detention till further inquiry (Law, 2017). After the geo-fencing, the second step is towards the identification parade. After arresting the accused now, it will be clear in the IP Test whether he is a real offender or not.

Importance of pre and post-identification of other methods

In the present scenario, the identification parade is considered as oldest method and it is now considered a method of illegal detention in Pakistan; because in the modern world, culprits deceive the investigating agencies with modern techniques and gadgets. All the above-mentioned pre and post-identification new modern methods and new technology with identification parade are highly important for effective and fair criminal justice system. New legislation at the federal and provincial levels is required to meet the merits of criminal cases. The main importance of this change is to support justice and innocent will be free from illegal detention and tyranny of this false procedure.

Conclusion

Pakistan has transformed the s adding modern techniques and methods. The pre-identification methods, like the digital lineup, photographic identification, geofencing, and video identification have improved witness accuracy and reduced potential biases. It also enhances the evidentiary value of the identification parade. The post-identification methods including IRIS scan, DNA, fingerprint comparison, and facial recognition technology have enhanced the reliability of the identification.

Even after the addition of new technologies and gadgets, Pakistan is facing challenges which include,

- Lack of resources and infrastructure
- Insufficient training and lack of refresher courses for investigating officers and Judicial officers
- Lack of expertise in the prosecution department

Now state has to invest in infrastructure and training for the investigation agencies, prosecution, and judicial officers. To prevent miscarriage of justice, effective and mistake-free identification parade processes are crucial. The adoption of modern gadgets and methods by Pakistan reflects a commitment to improve its criminal justice system.

Recommendations

The old system of the identification parade is still working in Pakistan, and the structure of its procedure is woefully insufficient for the justice in modern era. As a result of this, it is considered an unsafe method and an outdated technique. It was found and recorded that this method is incomplete and ineffective and it is now working for illegal detention rather than identifying the suspect. Therefore, it requires proper management and a revised legal framework to make it useful. By such amendments, the evidentiary value of the identification parade will be recognized by the courts.

In Pakistan, only a few forensic labs are currently working on forensic and advanced identification systems while in developed countries they have many that work under the umbrella of different law enforcement departments to tackle all these issues. In the province of Punjab now “Crime Scene Mobiles” are available but the mechanism for their availability is very tough. All other provinces must follow in the footsteps of the Punjab Government to launch such facilities for the residents of their province.

As foregoing the debate regarding the identification parade, there must be care for the basic rights of every individual. The state has to take all preventive measures to control the commission of offenses and in case of commission, provide a foolproof procedure for punishment to the culprits. It is the duty of the authorities and government that should assure public rights and provide a comfort zone so they can live a positive life with respect and dignity. The protection of complaints, victims of crime, and their witnesses is a prime duty of the state. The state must take appropriate measures for their protection. The courts must provide justice within a reasonable time because in many cases due to delay in trial proceedings the parties lose the evidence on which they rely.

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