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RESEARCH PAPER

The Detailing of First Information Reports (F.I.R.) in Winning the Convictions: An Analysis in the Light of Case Laws

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ABSTRACT

The aim of this study is to examine as to how adherence to or otherwise in detailing while drafting the First Information Report (F.I.R.) affects the judgments of the Courts. Although F.I.R. is not a basic evidence with regard to criminal investigations, but failings in mentioning timeliness, questionable identification, and factual material documentation in FIR often proves it's importance in adjudications. In this study doctrinal legal research approach was adopted to analyze the judgments of apex Courts of Pakistan. By using qualitative thematic analysis, the study examined these judgments across following key dimensions i.e. mentioning of the light source at the place of offence, detailed description of accused, well accurate timeliness in the registration of the FIR and in currency related cases precision with regard to the recovery of currency notes. Procedural integrity while drafting FIRs was found to be as a decisive factor, e.g.unjustified delays in recording FIRs will lead to create suspicion of fabrication (Hussain v. State, 1999), on the other hand excessive quick filings without plausible detail imply a concocted prosecution story (Kachkool v. State, 2002). Similarly unspecified role of accused with unclear body or facial descriptions weakens subsequent identification parade (Yaseer Naveed vs. State, 2013). Not mentioning light sources in night time crimes (Mansoor Ahmad v. State, 2012) as well as inaccurate denomination of currency notes in cash recovery cases (Maqsud Ahmad v. State, 2012), resultantly lead in evidence exclusion and acquittals. By implementing the uniform reporting format for FIRs, these will be converted from a mere administrative formality to a credible initial record of facts, ensuring the protection of the rights of the accused, improving the effectiveness of investigations, and boosting public confidence in the legal system.

KEYWORDS First Information Report (F.I.R.), Criminal Investigation, Judicial Credibility, Timeliness of FIRs, Evidence Collection, Case Laws

Introduction

First Information Report (F.I.R.) can be said as the "cornerstone of criminal adjudication in Pakistan and other South Asian countries adhering to the common law system" (Sheikh & Akbar, 2014). The FIR is not only a procedural requirement but a document of great significance that initiates the entire machinery of the criminal justice system (Akbar, 2019). It would not be inappropriate to assert that the F.I.R. in the Pakistani legal context has both evidentiary and procedural relevance. It is the first formal complaint, usually from the victim or witness, and its contents with determine the limits and future investigations (Akbar, 2019). The F.I.R. may become a point of reference in the trial proceedings, especially in matters concerning the credibility of witnesses, consistency of statements, and appreciability of evidence. More importantly, the F.I.R. may follow the admissibility of not substantive evidence but to corroborate or contradict the testimony of the informant or accused as stated in the Qanun-e-Shahadat Order, 1984 (Akbar, 2018).

But the legal validity and operational significance of the FIR is very much subject to its accuracy, completeness and the observance of appropriate timeliness (Siddiqui, 2022).

Judicial cases highlight that for various types of irregularities including unreasonable delay in registration, vague or ambiguous terminology, and the lack of necessary context, whilst there can be a reduction in evidential value of the information originally proffered by the complainant, the credibility and spontaneity to record a complaint can be called into question (Anderson & Newman, 1883). There are numerous precedents wherein the Courts have been emphasizing that the delay in filing the FIR tends to create a shadow of doubt on the genuineness and spontaneity of the information provided, especially in relation to unexplained delays or the aspect of tactical delay.

This research paper tends to offer a complete doctrinal and jurisprudential analysis of the essential ingredients of preparing an FIR, with the aim of emphasizing that procedural compliance tends to add to the efficacy of criminal prosecution, and non-compliance tends to create a possibility of acquittal. It aims to assist legal scholars, police officers, prosecutors, and judges in understanding how even minor deficiencies in an FIR may have disproportionately led to serious consequences on the outcome of a trial.

The study is structured around various themes. Through the evaluation of these issues using the judicial interpretation lens, this paper seeks to show that the recording of details of incidents in the FIR, as much as is possible, in the FIR drafting process is a very important justice-protecting mechanism. This paper shows that a good FIR helps the investigating and prosecution teams and also safeguards the rights of both the complainant and the accused in the case. The issues raised above are followed by the following themes:

Literature Review

Particularly in South Asia, the F.I.R. (First Information Report) is a vital component of the common law criminal process. Sheikh and Akbar (2014) claim the F.I.R. is more than a bureaucratic formality; it denotes the start of the criminal justice process. Registering an F.I.R. also officially acknowledges the existence of a cognizable offense, as Akbar (2019) notes. This official recognition sets off a chain of legal and investigative processes by judicial, forensic, and law enforcement agencies. This structure fits historical research on the administration of criminal justice. Anderson and Newman (1883) identified procedural obstacles meant to guard against arbitrary government powers.

While not strong evidence, Akbar (2018) argues that the F.I.R.'s evidentiary weight under the Qanun-e- Shahadat Order, 1984, supports corroborative purposes for informant testimony as well as impeachment. As stated by Siddiqui (2022), the legal legitimacy of a document is based on accuracy, completeness, and procedural compliance. Failure to meet these criteria will result in the diminished evidentiary value of the document and its presumptive reliability.

The Supreme Court in Nur Ahmad v. State (1968) declared that if properly justified, delay per se is not deadly especially when humanitarian needs (medical aid) come before legal procedures. On the other hand, Hussain v. State (1999) and Muhammad Wali v. State (2020) demonstrate how unexplained delays give rise to assumptions of witness coaching or narrative compilation. The concept that delay needs causal justification was made clear by Muhammad Rashid v. State (1987). Kachkool v. State (2002) and Asad alias Diloo v. State (2019) both show judicial suspicion of unusually timely filings with small details, therefore indicating pre-fabrication.

Courts mandate specific suspect identification to establish individual liability. *Wahid Iqbal v. The State* (2003) established that Test Identification Parades become essential when descriptions are recorded in F.I.R.s. *Yaseer Naveed v. State* (2013) invalidated F.I.R.s lacking elementary descriptors (age, height), while *NabiBux alias Nabu v. State* (1989) treated police omission of visible characteristics as potential shielding of accused. In the case of Muhammad Asghar v. The State (2002), the court condemned the use of ambiguous terms

such as "unknown persons," pointing out that such language reduces the strength of identification evidence and thus the prosecution's case. On the other hand, in the case of Muhammad Din v. State (1998), the court confirmed the conviction where the FIR had specifically identified the roles of the accused, including the assignment of the final shooting leading to death, thus emphasizing the need to clearly establish actus reus.

The Pakistani judiciary has also established a clear body of doctrine on the environmental aspects of criminal documentation. In the case of Mansoor Ahmad alias Shahzad alias Sheeri v. State (2012), the court ruled that in nighttime identification cases, the FIR must specifically state the source of light, such as electric bulbs, torches, or moonlight. The lack of this information was deemed sufficient to raise a reasonable doubt. In a similar case of Asad alias Diloo v. State (2019), the court allowed the identification evidence where the FIR specifically noted the use of electric lighting, thus meeting the court's expectations.

Material and Methods

This research uses a 'doctrinal legal research methodology,' which is appropriate for the analysis of legal provisions, judicial interpretations, and procedural practices within the formal system of criminal law in Pakistan. The research is based on a combination of primary and secondary sources of information, as follows:

Primary Legal Sources

This research work provides a comprehensive study of key and contemporary judgments of the Pakistan Supreme Court, various Provincial High Courts, and the Federal Shariat Court.

The choice of case laws has been made on the basis of their doctrinal significance, citation, and impact in the interpretation and application of the First Information Report (F.I.R.) under the Code of Criminal Procedure (CrPC) and Qanun-e-Shahadat Order, 1984, respectively.

Thematic Categorization and Analysis

- A framework of qualitative thematic analysis is used to analyze the legal data. Judicial observations and decisions are synthesized to formulate wide procedural themes that are at the heart of the reliability and evidentiary significance of FIRs. These are:
- The timeliness of FIR registration and its legal implications;
- Accuracy in the description of suspected culprits and their respective roles.
- Recording light conditions in night offenses;
- Accuracy in the details of financial recovery, especially in cases of corruption or theft;
- Judicial responses to procedural irregularities and their bearing on conviction or acquittal.
- The thematic analysis provides a systematic assessment of judicial concerns and legislative requirements, facilitating a macroscopic perspective on the implications of procedural rigor or laxness on the evidentiary significance of FIRs in criminal trials.

By this multi-tiered and systematically coherent approach, the study seeks to provide a doctrinally correct and practically useful analysis of the need to prepare an F.I.R. as an investigative and legal tool in the Pakistani criminal justice system.

Results and Discussion

This section summarizes judicial precedents, case law, and procedural guidelines for writing and the importance of evidence of the First Information Report (F.I.R.). It depends upon guiding verdicts by Pakistan's superior courts in identifying trends, expectations, and implications as compared to some procedural tendencies.

Promptitude in Registration of F.I.R.

For F.I.R. registration, the timing aspect has always been a determining factor in criminal procedures. Employing standards of natural justice and reasonableness, courts continuously examine undue speed and delays with same zeal.

Delays in F.I.R.s and Judicial Scrutiny

Unexplained delay in registering the F.I.R.s is generally a warning signal for courts, which is presumed as afterthoughts, tutoring of the witnesses, or doctoring of the evidence. The view of the courts is that delay alone is not fatal, but lack of a reasonable explanation would go against the case of the prosecution.

In (Hussain v. State, 1999) an F.I.R. was registered four and a half hours after the corpse of the victim was spotted, without any satisfactory explanation. The Supreme Court observed that there was a palpable gap during which the narrative could very well have been concocted, leading to the acquittal of the accused.

On the other hand, in the matter of (Nur Ahmad v. State, 1968), the delay was justifiable as there was a priority to transfer the injured victim to the hospital, and the court appreciated that humanitarian interests could quite rightly have their priority over legalities.

In (Muhammad Wali v. State, 2020), of the Balochistan High Court, a three-day inexplicable delay led the court to exclude pertinent prosecution evidence and necessitated the acquittal of the accused.

Held

"Delay per se in lodging F.I.R. is not material if there is a cause for delay."(*Muhammad Rashid v. State*, 1987).

Excessively Prompt F.I.R.s and Suspicion

While haste is generally appreciated, however, courts are also cautious when the F.I.R. appears to be lodged not only with haste but also contains unrealistic detail within a short while of a highly traumatic experience.

In (Kachkool v. State, 2002), the court noted that the very premature registration of the F.I.R. raises suspicion regarding whether the facts were pre-fabricated or not. The detailed explanation given within such a short time frame raised suspicion of pre-prepared F.I.R.

In (Asad alias Diloo v. State, 2019), the Federal Shariat Court held that F.I.R.s registered within a period of 15 minutes from the occurrence, especially those containing minute details, require corroborative evidence to prove their credibility.

Held

"A very swift F.I.R. would instead indicate that something was pre-planned." (*Kachkool v. State*, 2002).

Description of the Accused in the F.I.R.

Police and complainants are expected by courts to record visible characteristics of suspects in the F.I.R. to facilitate subsequent identification at the investigation and trial level.

A specific and descriptive identification of the accused in the F.I.R. is a mandatory procedural requirement. Failure to observe identifying features negates the credibility of the complaint as well as the success of identification procedures such as Test Identification Parades (TIPs).

Federal Shariat Court in *(Wahid Iqbal v. The State, 2003)* was the view that identification parades are essential in law when description is done in the F.I.R. Neglect of such parades makes any identification later in the courtroom futile.

The Lahore High Court in *(Yaseer Naveed v. State, 2013)* declared an F.I.R. as invalid on the grounds of lack of elementary descriptors such as age or height, holding that it was insufficient for attributing to individuals.

In *(NabiBux alias Nabu v. State, 1989),* the Sindh High Court held that when the offense was committed in day light and the accused were seen and chased by witnesses, the police officer's negligence in putting down their description in the F.I.R. is a major lapse, which can either be due to unawareness of the legal norms or a motivated and intentional attempt to shield the accused, contrary to the duty of a police officer.

Consequences of Vague Descriptions

Where the complainant does not provide any physical descriptions or details, simply speaking of "unknown persons", the judicial inference lies in the direction of suspicion, especially where eyewitnesses were mentioned to be present.

In*(Muhammad Asghar v. The State, 2002),* the F.I.R. narrated that "three unknown persons" had committed the offense. The court criticized the lack of any physical descriptors and questioned the veracity of the alleged identification process.

Even in*(Irfan Ali alias Ghulam Raza alias Ramzan v. State, 2011)*, the Lahore High Court has taken into consideration the recording of details of description of features of the accused in the FIR

Role of the Accused in the F.I.R.

Besides naming the accused, the courts expect the F.I.R. must narrate the details of the role and act of every individual in the commission of offenses. Indeterminate charges like "the accused were involved" are not sufficient for attributing personal fault.

In *(Muhammad Din v. State, 1998),* a conviction was upheld as the F.I.R. specifically described that the accused made firing which proved a fatal shot. This specific attribution was also supported by witness statements and forensic evidence.

Source of Light in Nocturnal Offences

If the offense is committed at night, visibility is a very important area of evidence. The F.I.R. must include descriptions of the source of light that enabled the complainant or the witnesses to identify the perpetrators.

In (Mansoor Ahmad alias Shahzad alias Sheeri v. State, 2012), the court rejected the witness's identification since the F.I.R. did not state whether there was any source of light or not, hence it was unlikely that the defendant would be identified.

By contrast, in (Asad aka Diloo v. State, 2019), the court accepted the witness's identification on the basis of an observation that an electric bulb illuminated the scene of the crime, notwithstanding the fact that the F.I.R. made no reference to the description of the accused.

Therefore, particularly in rural locations or during blackouts, it can be safely inferred that a lack of light source information may cast doubt and make testimony unreliable. The defense can argue that identifying was not feasible because it was dark if there is no reported light source.

Denomination of Currency Notes in Recovery Cases

In cases of financial recovery, the accuracy of denomination and serial numbers is also found mandatory. Courts require the F.I.R. or the recovery memo, or both, to contain accurate details of recovery articles to ensure credibility and avoid disputes over evidence.

In (Maqsud Ahmad alias Sudi v. State, 2012), the Courts considered the authenticity of the case when the recovery note did not indicate the precise currency denominations, hence undermining the case of the prosecution.

Conclusion

First Information Report (FIR) is the foundation on which the whole system of criminal justice depends. Based on the formal First Information Report (FIR), which specifies the claimed criminal activity, suspects are identified, statements from witnesses are taken, and thorough evidence analysis is done. Eventually influencing justice, the thoroughness and admissibility of the report determines the success of the prosecution's investigation.

This study has established that Pakistani courts have persistently demanded both substantive and procedural integrity of the F.I.R. It is evident from case laws that unexplained delays, vague descriptions, and omission of surrounding circumstances such as sources of light or currency denominations, can fatally harm the prosecution's case. On the other hand, a promptly registered FIR, factually detailed and procedurally correct, lends impetus to the credibility of the complainant and enhances the prospects of a successful conviction.

Judicial observations in cases where the omission of required details, the specific role of each accused, description, or source of light in cases involving nighttime is generally interpreted either as negligence on the part of investigations or manipulation, and consequently results in the accused being accorded the benefit of the doubt.

In addition, the study emphasizes the importance of providing law enforcement personnel with sufficient training in legal drafting and fact recording. The addition of specific modules on FIR registration to the training curriculum of police training schools, as well as the use of standardized reporting formats, is a step in the right direction and could make a world of difference in procedural compliance.

In sum, the FIR is much more than a mere administrative document; it is a basic legal document that marks the first official report of the alleged incident. While its evidentiary value is not conclusive in and of itself, it is the critical nexus between the occurrence of the crime and the initiation of the criminal justice system. Its reliability and accuracy are not

simply legal niceties but are, in fact, the sine qua non of maintaining public faith in the rule of law.

Recommendations

- **Balanced Scrutiny of Prompt FIRs:** The training and procedural manuals should apprise against too detailed descriptions being recorded within an unrealistically short time frame following traumatic events. The contents should reflect natural reporting and not pre-formed descriptions.
- **Detailed Identification Requirements**: FIRs must compulsorily contain the visible physical features of the accused persons, especially in the case of eyewitness identification. This will further strengthen the Test Identification Parade (TIP) and increase the reliability of evidence at the trial.
- **Clear Attribution of Individual Roles**: Each accused person's specific act (actus reus) should be clearly recorded in the FIR. General allegations such as collective involvement should be avoided unless legally justified, as courts consistently require individualized attribution of conduct.
- **Documentation of Environmental Conditions**: In nocturnal offences, FIRs must explicitly record the source and intensity of light that enabled identification. This requirement should be incorporated into police manuals to prevent reasonable doubt arising from missing details.
- **Precision in Recovery Documentation**: In financial and property-related offences, FIRs and recovery memos should include exact denominations, serial numbers, and distinguishing features of recovered items. This would reduce challenges to evidentiary authenticity.
- **Capacity Building and Legal Training**: Police training institutions should introduce specialized modules on evidentiary standards developed by superior courts. Regular refresher courses should be conducted to align investigative practices with evolving judicial expectations.
- **Monitoring and Supervisory Oversight**:Senior supervisory officers should review FIRs at the registration stage to ensure procedural compliance. Periodic audits may help identify recurring deficiencies and improve institutional accountability.
- **Bridging Doctrine and Practice Through Empirical Research**: Further empirical studies should examine whether procedural lapses stem from lack of training, workload pressures, institutional culture, or systemic constraints. Evidence-based reform strategies can then be designed to align policing practices with established judicial standards.

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