

MASTER CROSS-EXAMINATION HANDBOOK

MURDER CASES — SECTION 302 PPC

Peshawar High Court Edition | Updated: 2025–2026

Incorporating Latest Judgments From:

Supreme Court of Pakistan | Peshawar High Court | Lahore High Court

2024 SCMR 929 | 2025 CCJ 6 | 2026 SCLR 99 | LHC Bulletin 2025

SYED ZESHAN HASHMI (ADVOCATE)

Peshawar High Court | Member PHC Bar Association

The Arbitrator & Law Associates

Opposite Prime Hospital, Ring Road, Peshawar

📞 0313-4859592 | 🌐 arbitratorandlaw.com

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📚 LATEST 2025–2026 CONTROLLING JUDGMENTS

The following judgments are the most recent controlling authorities from the Supreme Court of Pakistan, Peshawar High Court, and Lahore High Court. They must be deployed in cross-examination of every prosecution witness.

A. FIR DELAY & SECTION 161 STATEMENT DELAYS

CITATION	LEGAL RATIO / PRINCIPLE
2024 SCMR 929 (Shaukat Hussain v. State)	Four hours' unexplained delay in lodging FIR creates adverse inference against prosecution. Station being nearby makes delay inexcusable. Failure to produce available witness = adverse presumption. Court must draw negative inference.
2025 CCJ 6 = 2025 PCrLJ 57 (Muhammad Ikhlas v. State)	Ten-hour FIR delay where police station was only 1.5 km away = fatal. Even ONE OR TWO DAYS' unexplained delay in recording s.161 CrPC statement of an eyewitness is fatal to eyewitness testimony (citing 2017 SCMR 486).
LHC Bulletin June 2025 (Manzoor Ahmed v. State)	Unexplained delay in registering FIR indicates deliberation and consultation before lodging. Court must draw adverse inference. Delay in recording s.161 statements also fatal (LHC Entry No. 49).
LHC Bulletin June 2025 (Sabran Bibi v. State)	Delayed forwarding of samples to PFSA casts doubt on tampering with physical evidence. Site plan omitting seizing officer and recovery witnesses undermines recovery proceedings entirely.

B. BENEFIT OF DOUBT & ACQUITTAL (DOUBLE PRESUMPTION)

CITATION	LEGAL RATIO / PRINCIPLE
2026 SCLR 99 = 2026 SCP 136 (Saddam Hussain v. State) Justice Ishtiaq Ibrahim J. 27 April 2026	'Better for guilty persons to go free than for an innocent person to be convicted' (Woolmington v DPP; Blackstone's Ratio). Where manner of occurrence remains unclear, doubt must benefit accused as matter of right. Ocular-medical contradiction (downward shot from roof vs. parallel wound trajectory) = fatal. IO's own cross-admission that cross-version was correct = powerful acquittal tool.
SC, May 2026 (Muhammad Iqbal v. State) Justice Ishtiaq Ibrahim J. (Dawn 10 May 2026)	Single circumstance creating reasonable doubt = acquittal as matter of RIGHT, not favour. Abscondence alone is NOT proof of guilt — people flee for fear of harassment; corroborative at best; no weight where eyewitness account is doubtful. Evidence/circumstances not put to accused u/s 342 CrPC CANNOT be used against him.
SC, June 2026 (Re: Double Presumption) Justice Muhammad Ali Mazhar J. (Tribune 28 June 2026)	Acquittal carries DOUBLE PRESUMPTION OF INNOCENCE. Appellate court should rarely disturb acquittal — only where manifestly perverse/glaring error. Where two reasonable conclusions possible, view favouring acquittal MUST prevail.
LHC Bulletin June 2025 (Sabran Bibi v. State)	'If the defence may be true, the accused is entitled to benefit of doubt as of right, not as a concession.' Gaps in investigation must be resolved in favour of accused.
LHC Bulletin June 2025 (Mushtaq Ahmed v. State)	Where co-accused received benefit of doubt on IDENTICAL evidence, same benefit must extend to all accused on the same ocular account. Unnatural conduct of related eyewitnesses (not at scene) = no benefit of doubt to prosecution.

C. WEAPON RECOVERY & FORENSIC EVIDENCE

CITATION	LEGAL RATIO / PRINCIPLE
LHC Bulletin June 2025 (Manzoor Ahmed — Mosque	Recovery from a public place such as a mosque CANNOT be treated as exclusive possession of accused. Mashirs summoned by telephone = recovery doubtful. Recovery

Recovery)	from open place = limited evidentiary value.
LHC Bulletin June 2025 (Various)	Recovery without forensic corroboration is weak evidence (LHC Entry 49). Recovery of weapon without crime empties has weak evidentiary value (LHC Entry 37). Weapon recovery must be corroborated by FSL report matching bullet/pellets to weapon.
LHC Bulletin June 2025 (LHC Entry 46)	Mismatch between injured person in FIR and medical evidence is significant contradiction. Bloodstained clothing of complainant not produced = adverse inference.

D. EYEWITNESS — CREDIBILITY & CHANCE WITNESS

CITATION	LEGAL RATIO / PRINCIPLE
2017 SCMR 596 (Mst. Rukhsana Begum v. Sajid) [Applied in 2025 CCJ 6]	Eyewitness living 2 km away with no specific reason for being at scene = chance witness; testimony needs independent corroboration.
2024 SCMR 1224 (Riasat Ali v. State) [Applied in 2025 CCJ 6]	Witness claiming to have taken injured to hospital but medical records showing otherwise = unnatural conduct = discrediting witness testimony entirely.
LHC Bulletin June 2025 (LHC Entry 33)	Related/chance witnesses require corroboration. Non-participation in medico-legal formalities affects credibility. Sequential firing narratives must match injuries in medical evidence.
LHC Bulletin June 2025 (LHC Entry 46–47)	Dishonest improvements reduce witness credibility. Testimony of injured eyewitness without corroboration is weak. Motive may cut both ways — unproven motive weakens prosecution.
2026 SCLR 99 (Saddam Hussain v. State)	IO admitted in cross that cross-version of free fight was correct, and that co-accused had taken injured to hospital before deceased was hurt. Medical finding of parallel wound trajectory contradicted claim of downward shot from roof. IO cross-examination = gold mine.

E. IO INVESTIGATION — DEFECTS & OMISSIONS

CITATION	LEGAL RATIO / PRINCIPLE
LHC Bulletin June 2025 (Sabran Bibi v. State)	Site plan omitting customer/seizing officer/recovery witnesses = undermines entire recovery proceedings. Two FIRs registered at same police station on overlapping facts = mala fide/planted case indicator.
2025 CCJ 6 (Muhammad Ikhlas v. State)	Prosecution not producing available eyewitness without justification = adverse presumption against prosecution (adverse inference rule, citing 2024 SCMR 929).
LHC Bulletin June 2025 (LHC Entry 37)	Abscondance alone does not prove guilt. Warrant/proclamation procedure (ss.204, 87, 88 CrPC) must be properly documented. IO must prove each procedural step was taken.
2026 SCLR 99 (Saddam Hussain v. State)	Post-mortem conducted 12–18 hours after estimated death = prosecution timeline weakened. IO's failure to investigate cross-version = biased investigation. Cross-admissions by IO in cross-examination can destroy prosecution case.
LHC Bulletin June 2025 (LHC Entry 45)	A Magistrate cannot return s.173 CrPC police challan merely because no complaint was filed. IO's procedural compliance with s.173 must be complete and timely.

W-1: COMPLAINANT / INFORMANT — CROSS-EXAMINATION

SECTION A — BACKGROUND & LEGAL FRAMEWORK QUESTIONS

Legal basis: QSO Art. 132 (compellability), Art. 140 (contradicting witness by prior statement), CrPC s.154 (FIR contents).
Purpose: Establish FIR delay, motive to falsely implicate, omissions in first version.

1	You are the complainant in this case?	Establish standing
2	You lodged FIR No. ___ on ___ date?	Confirm FIR details
3	The incident occurred at ___ time. You reached the police station at ___ time?	Lay foundation for delay
4	The distance from the scene to the police station is approximately ___ km?	Quantify proximity
5	You did not explain in the FIR why it took ___ hours to lodge the report?	Highlight unexplained delay — 2024 SCMR 929
6	You did not name the accused as the killer in the FIR immediately after the incident?	Omission in first version
7	You had enmity with the accused family before this incident?	Motive to falsely implicate
8	There is a civil/property/family dispute pending between you?	Prior motive
9	You consulted your relatives before lodging the FIR?	Deliberation — 2024 SCMR 929 ratio
10	The names given in the FIR were decided after consultation?	Contrived nomination

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**You reached the police station within 30 minutes of the incident, isn't that correct?**	💡 Wait for answer — if No, press: 'Then how long did it take and why?'	⚠️ Put their own delay against them: '2024 SCMR 929 says 4-hour delay = adverse inference'
2	**You did not mention the exact words spoken by the accused in**	💡 Note the omission — any words added in court = dishonest	⚠️ Confront with FIR: 'You said in court accused said X — this is

	your FIR, did you?	improvement	NOT in your FIR'
3	**The eyewitness you named was not named in your s.161 statement recorded the next day?**	💡 Cross-check s.161 statement vs FIR vs court testimony	⚠️ Confront with s.161: 'In your s.161 you did NOT mention this witness'
4	**You had a land dispute with the accused family since ___?**	💡 Establish motive — gets them to admit or deny	⚠️ If denied: produce documentary evidence of dispute from revenue records
5	**You did not take the deceased to hospital yourself — you left the scene?**	💡 Unnatural conduct test (2024 SCMR 1224 ratio)	⚠️ 'Then who took him? Why did you go to police instead of hospital?'
6	**After such a traumatic event you had the presence of mind to remember exact description of accused's clothing?**	💡 Memory under trauma = suspicious precision	⚠️ 'You were grieving your relative, yet you noted shirt colour, trouser type?'
7	**None of the neighbours came out despite the commotion?**	💡 No independent witnesses = planted account	⚠️ 'You mean to say nobody from the area saw this incident except your own party?'
8	**The s.161 statement of the eyewitness was recorded ___ days after the FIR — not the same day?**	💡 2025 CCJ 6 — delayed s.161 = fatal	⚠️ 'IO failed to record it immediately — this delay is unexplained and fatal'
9	**The accused had no motive to kill the deceased on that day — no fight, no argument beforehand?**	💡 Remove spontaneous motive	⚠️ If they allege motive: 'When did this alleged motive arise? Is it in the FIR?'
10	**The bloodstained clothes of the deceased were not handed to police by you?**	💡 LHC 2025 — bloodstained clothing not produced = adverse inference	⚠️ 'Yet you claim to have been present — why did you not preserve this evidence?'

📦 TRAP TECHNIQUE: THE FIR DELAY HAMMER

Step 1: Ask exact time of incident vs time of FIR. Step 2: Ask distance to police station. Step 3: Ask why delay occurred (expect: 'I was in grief'). Step 4: Put question — 'But 2024 SCMR 929 says even 4 hours is fatal without explanation — your delay was ___ hours.' Step 5: Demand IO explain the delay in IO's cross. Effect: Creates adverse inference under 2024 SCMR 929 / 2025 CCJ 6.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

▶️ Cross with IO (W-5): IO must confirm delay in FIR reaching him and delay in recording s.161 statements
▶️ Cross with Eyewitness (W-2): Their s.161 delay must match what complainant says
▶️ Cross with Moharrar (W-8): Check time FIR was actually entered in FIR register

CITATION	LEGAL RATIO / PRINCIPLE
2024 SCMR 929	4-hour delay = adverse inference. Unexplained = fatal.

2025 CCJ 6	10-hour delay + 1-2 day s.161 delay = fatal to entire prosecution.
LHC June 2025	Delay = consultation/deliberation; FIR not product of spontaneous reaction.

W-2: EYEWITNESS (OCULAR ACCOUNT) — CROSS-EXAMINATION

SECTION A — BACKGROUND & CREDIBILITY ASSESSMENT

Legal basis: QSO Art. 17 (number of witnesses), Art. 140 (prior statement contradiction), Art. 150 (hostile witness). Key challenge: Was the witness really present? Is their account natural? Does it match medical evidence?

1	You were present at the scene at the time of incident?	Establish presence claim
2	What were you doing there at that exact time?	Test natural presence
3	You live ___ km from the scene?	Distance test — 2017 SCMR 596
4	You had no specific reason to be at that location at that time?	Chance witness test
5	You are related to the complainant/deceased?	Interested witness — QSO Art.17 note
6	Your s.161 statement was recorded on ___?	Check delay — 2025 CCJ 6
7	There is a difference between what you said in s.161 and what you say now?	Dishonest improvement
8	You did not participate in taking the deceased to hospital?	Unnatural conduct — 2024 SCMR 1224
9	You claim to have seen the accused clearly — what was the lighting at the scene?	PHC BA 559-B/2025 — darkness
10	What distance were you from the accused when you saw him?	Visibility / identification test

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**You live more than 2 km from the scene of the crime, don't you?**	💡 2017 SCMR 596 chance witness — set up the inference	⚠️ 'Then why were you there? And no one else from that area saw the incident?'
2	**Your s.161 statement was recorded ___ days after the FIR, not the same day?**	💡 2025 CCJ 6 — 1-2 day delay = fatal	⚠️ 'IO failed to record your statement immediately — this is an unexplained gap'

3	**You did NOT mention certain details in your s.161 statement that you have now said in court?**	💡 Classic dishonest improvement trap	⚠️ Confront: 'Show me where in Exhibit P-__ you stated this — [pause] — it is not there'
4	**The incident happened at night / in poor light, and you were ___ metres away?**	💡 PHC 2025 — 150 paces in darkness = identification highly doubtful	⚠️ 'At that distance and in that light, how could you distinguish the accused?'
5	**You are the complainant's brother/cousin/uncle — you share the same interest in the outcome?**	💡 Interested witness — corroboration needed	⚠️ 'Your entire family benefits from the conviction — you all have the same motive to exaggerate'
6	**The accused had a single weapon but the deceased had injuries on multiple body parts?**	💡 2026 SCLR 99 — single weapon multiple injuries contradiction	⚠️ Bring in doctor to confirm: different entry wounds inconsistent with single shooter/weapon
7	**You did not raise any alarm at the time of incident — no one from the area came?**	💡 Unnatural absence of third-party witnesses	⚠️ 'In such a public attack, nobody else saw it and nobody came running?'
8	**Your version today differs materially from what you told the IO — isn't that an improvement?**	💡 QSO Art.140 — prior inconsistent statement	⚠️ Produce s.161 exhibit and read it out: 'You said X to IO, but in court you said Y'
9	**The eyewitness named in FIR was NOT named in the s.161 statement recorded one day later?**	💡 Major omission = addition after consultation	⚠️ 'Why did the IO not record your name in the s.161 — or did you add yourself later?'
10	**You agree you took no steps to preserve the scene, call police immediately, or take photographs?**	💡 Unnatural conduct after witnessing murder	⚠️ 'A person who truly witnesses a murder would do something — you did nothing immediately'

📦 TRAP TECHNIQUE: THE CHANCE WITNESS TRAP

Step 1: Confirm witness lives far from scene. Step 2: Ask what brought them to scene. Step 3: Ask why no one else from area saw incident. Step 4: Note that witness did NOT participate in medical formalities. Step 5: Confront with 2017 SCMR 596 and 2025 CCJ 6 — 'Your presence is unexplained; your s.161 was delayed; your conduct was unnatural — this court must not rely on your testimony without corroboration.' Effect: Destroys standalone eyewitness testimony.

📦 TRAP TECHNIQUE: THE DISHONEST IMPROVEMENT CONFRONTATION

Step 1: Read s.161 statement aloud slowly. Step 2: Ask 'Is this your statement made to IO?' Step 3: Ask 'Does it contain this detail you mentioned today?' Step 4: Wait for denial or admission. Step 5: Put QSO Art.140 — 'Your statement to IO was your FIRST account — any addition now is a dishonest improvement designed to fill gaps.' Cite LHC June 2025 (dishonest improvements reduce credibility).

🔗 CROSS-REFERENCE TO OTHER WITNESSES

▶️ Cross with IO (W-5): IO must explain delay in recording s.161 statement of this witness
▶️ Cross with Doctor (W-6): Medical evidence must be tested against eyewitness narrative of shooting
▶️ Cross with Complainant (W-1): Any additions to FIR version must be identified

CITATION	LEGAL RATIO / PRINCIPLE
2017 SCMR 596	Chance witness living far away, no reason to be present = corroboration required.
2024 SCMR 1224	Witness who claims to be present but did not participate in medical formalities = unnatural conduct.
2025 CCJ 6	Even 1-2 day delay in s.161 statement of eyewitness is fatal.
LHC June 2025	Dishonest improvements reduce credibility. Sequential firing must match injuries.

W-3: RECOVERY MASHIR (WITNESS TO RECOVERY) — CROSS-EXAMINATION

SECTION A — BACKGROUND QUESTIONS

Legal basis: CrPC s.103 (search/recovery witnesses), Police Rules 1934 Rule 25.11. Challenge: Were mashirs independent? Was place of recovery public or exclusive? Were they summoned by phone (biased)?

1	You were present when the recovery was made?	Establish presence
2	You were called by the police specifically to witness the recovery?	Telephone summon = police plant
3	The place of recovery was ___?	Public/private — crucial question
4	You had never met the accused before the recovery?	Independent mashir test
5	The recovery took place at ___ time on ___ date?	Timeline check
6	Was the recovery place accessible to the public?	Public place = no exclusive possession
7	Was anyone else present at the recovery scene?	Third-party witness absent?
8	The IO conducted the recovery — not a Magistrate?	Judicial supervision absent
9	The recovered item was sealed immediately in your presence?	Chain of custody
10	You signed the recovery memo — did you read it before signing?	Blind signing = unreliable mashir

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**You were telephoned by the police and asked to come for the recovery?**	💡 Manzoor Ahmed — telephonic mashirs = unreliable	⚠️ 'So police chose you — you didn't volunteer; this is a hand-picked witness'
2	**The recovery was made from an open/public place — not exclusively in the accused's control?**	💡 Manzoor Ahmed — mosque recovery = no exclusive possession	⚠️ 'Anyone could have placed the weapon there — you cannot say it belonged to the accused'

3	**There was no other independent person from the locality present at the recovery?**	💡 Police Rules 1934 r.103 — two independent mashirs required	⚠️ 'The law requires two independent mashirs — you were both police-called; neither is independent'
4	**No Magistrate was present to supervise the recovery — correct?**	💡 Judicial oversight absent	⚠️ 'Section 103 CrPC requires independent presence — police-supervised recovery is unreliable'
5	**The forensic report (FSL) did NOT link the recovered weapon to the crime?**	💡 LHC 2025 — recovery without FSL corroboration is weak	⚠️ 'If there is no FSL match, what probative value does this recovery have?'
6	**The recovery memo was prepared by the IO — not by an independent person?**	💡 IO-prepared memo = self-serving document	⚠️ 'The same IO who investigated the case also prepared the recovery memo — there is no independent documentation'
7	**You did not see where exactly the accused pointed while leading police?**	💡 Voluntary disclosure vs. police-led discovery	⚠️ 'Did accused point to the spot, or did police say 'look here'? Big difference.'
8	**No crime empties were recovered from the scene of murder?**	💡 LHC 2025 — no empties = weak case	⚠️ 'Without crime empties, the weapon cannot be linked to the murder mechanically'
9	**The recovered item was not sealed in your presence in a proper evidence bag?**	💡 Chain of custody — tampering window	⚠️ 'An unsealed item handled by multiple police officers cannot be trusted as the same item tested in FSL'
10	**More than 24 hours passed between the FIR and the recovery — is that correct?**	💡 Delayed recovery = opportunity to plant	⚠️ 'In the time between the crime and recovery, who had access to the location?'

🪤 TRAP TECHNIQUE: THE TELEPHONIC MASHIR TRAP

Step 1: Ask how mashir was informed about recovery. Step 2: Confirm it was by phone from police. Step 3: Ask who else was called from the locality. Step 4: Establish no independent person from locality was present. Step 5: Quote Manzoor Ahmed v. State (LHC June 2025) — 'Mashirs summoned by telephone made the recovery doubtful; this is exactly such a case.' Effect: Destroys recovery as planted/concocted.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

▶️ Cross with IO (W-5): IO must explain why telephonic mashirs were chosen and why no independent public mashirs
▶️ Cross with FSL Expert (W-7): FSL must link recovered weapon to crime — absent = recovery worthless
▶️ Cross with Moharrar (W-8): Check entry time of recovery in malkhana register

CITATION	LEGAL RATIO / PRINCIPLE
LHC June 2025 (Manzoor Ahmed)	Recovery from public place (mosque) cannot prove exclusive possession. Telephonic mashirs = doubtful.

LHC Entry 49, 2025	Recovery without forensic corroboration is weak evidence. No crime empties = no mechanical link.
LHC Entry 37, 2025	Weapon without crime empties has weak evidentiary value.

W-4: MEDICAL OFFICER / DOCTOR (POST-MORTEM / MLC) — CROSS-EXAMINATION

SECTION A — BACKGROUND QUESTIONS

Legal basis: QSO Art. 59 (expert opinion), Art. 47 (dying declaration procedure). Challenge: Wound trajectory vs. eyewitness account, time of death, weapon type.

1	You conducted the post-mortem on ___?	Confirm post-mortem details
2	The post-mortem was conducted approximately how many hours after death?	Delay in post-mortem — 2026 SCLR 99
3	The time of death is an estimate — it can vary by several hours?	Time flexibility
4	The trajectory of the wound — was it downward, upward, or horizontal?	2026 SCLR 99 — parallel vs. downward
5	Single weapon or multiple weapons — what do wounds suggest?	PHC 2025 — single weapon multiple injuries
6	The calibre of the weapon that could have caused these wounds?	Weapon type test
7	Were the wounds consistent with fire from the same level as the deceased?	Roof claim vs. ground level
8	You only state what you observed — you did not witness the incident?	Expert opinion is limited
9	The medical evidence alone cannot prove who fired the weapon?	Medical evidence cannot name shooter
10	Injuries on multiple body parts — were they consistent with one shooter?	Single vs. multiple shooters

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**The post-mortem was conducted ___ hours after the estimated time of death?**	💡 2026 SCLR 99 — delayed PM weakens prosecution timeline	⚠️ 'So your time of death estimate could vary by ± several hours from what prosecution claims'

2	**The wound trajectory shows a horizontal/parallel angle — not from above?**	💡 2026 SCLR 99 — challenges roof shooter claim	⚠️ 'If the eyewitness says accused was on the roof, how does a horizontal wound occur?'
3	**The injuries on the deceased are on multiple body parts — front, back, side?**	💡 PHC 2025 — single weapon cannot cause multiple-direction injuries	⚠️ 'A single shooter at one position cannot cause wounds in multiple directions simultaneously'
4	**Medical evidence alone cannot tell us who fired the shot?**	💡 Expert opinion limitation	⚠️ 'So your report does NOT name the accused as the shooter — you simply describe the wounds'
5	**The weapon type you've described is commonly available — not a uniquely identifiable weapon?**	💡 Weapon identification limitation	⚠️ 'Any of several people with similar weapons could have caused these injuries'
6	**The deceased could have been moved before or after death — the position of body does not prove where shooting occurred?**	💡 Scene manipulation possible	⚠️ 'You did not attend the scene — you only saw the body in hospital/mortuary'
7	**An injury on the right side of the body and another on the back cannot both be caused by a single frontal shooter?**	💡 Contradiction in ocular account vs. wounds	⚠️ 'Yet the eyewitness says accused was directly in front — how did the back wound occur?'
8	**The time of death estimate leaves a window of ___ hours either way?**	💡 Time of death uncertainty	⚠️ 'So prosecution's claim that accused was seen leaving the scene at exactly ___ time may be wrong'
9	**Injuries are consistent with fire at close range — not from a distance of ___ metres as the eyewitness claims?**	💡 Range inconsistency	⚠️ 'Close-range powder burns vs. eyewitness claim of distance — which is accurate?'
10	**The clothing of the deceased showing bullet holes was not produced to you for examination?**	💡 Missing physical evidence	⚠️ 'Yet forensic examination of clothing could have confirmed the entry angle — why was it not done?'

📦 TRAP TECHNIQUE: THE MEDICAL CONTRADICTION TRAP

Step 1: Get doctor to confirm wound trajectory (e.g., horizontal). Step 2: Remind court that eyewitness said accused was on ROOF. Step 3: Ask doctor — 'Can a shot from above (downward) cause a horizontal wound?' Step 4: Doctor will say no. Step 5: Cite 2026 SCLR 99 (Saddam Hussain) — 'Medical finding of parallel trajectory contradicted claim of downward shot from roof — conviction set aside.' Effect: Ocular account destroyed by its own medical evidence.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

▶️ Cross with Eyewitness (W-2): Their account of shooter position must match wound trajectory

▶️ Cross with FSL (W-7): FSL weapon match must be consistent with wound type
▶️ Cross with IO (W-5): IO must explain why clothing was not sent to FSL

CITATION	LEGAL RATIO / PRINCIPLE
2026 SCLR 99	Ocular-medical contradiction — downward shot from roof vs. parallel wound trajectory = conviction set aside. Uniform wound characteristics suggest single weapon, not three different guns.
LHC June 2025 Entry 37	Contradictions between ocular and medical evidence can lead to disbelief of witnesses against ALL accused.
LHC June 2025 Entry 46	Sequential firing narratives must match injuries in medical evidence.

W-5: INVESTIGATING OFFICER (IO) — CROSS-EXAMINATION

SECTION A — INVESTIGATION DEFECTS & LEGAL FRAMEWORK

Legal basis: CrPC ss.154,157,161,162,172,173 | Police Rules 1934 rr.25.2,25.11,22.70 | Police Order 2002 Art.14 | QSO Art.140.
Challenge: Biased investigation, procedural omissions, delayed actions.

1	You are the IO assigned to investigate this case?	Establish identity
2	You received the FIR at ___ on ___?	Confirm FIR receipt — s.157 CrPC starts 24-hour clock
3	You visited the crime scene on ___?	Scene visit delay — s.157 duty
4	You prepared the site plan — it does not show the positions of all witnesses?	Site plan defects — LHC 2025
5	You recorded the eyewitness s.161 statement on ___?	Delay in s.161 — 2025 CCJ 6
6	The mashirs for the recovery were called by you on telephone?	Telephonic mashirs — LHC 2025
7	You did not record the cross-version of the accused?	Biased investigation — 2026 SCLR 99
8	You did not send the recovered weapon to FSL within 24 hours?	FSL delay = tampering window
9	You did not investigate the defence's version that this was a free fight?	One-sided investigation
10	Your case diary (s.172 CrPC) does not contain entries for all your investigative steps?	Case diary gaps

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**You received the FIR but the eyewitnesses' s.161 statements were not recorded the same day — correct?**	💡 2025 CCJ 6 — delay in s.161 fatal	⚠️ 'You had a duty to record immediately — why wait ___ days?'
2	**The site plan you prepared does not mention the complainant,**	💡 LHC 2025 — incomplete site plan undermines recovery	⚠️ 'A site plan without key positions is useless — it doesn't corroborate the prosecution story'

	eyewitness, or positions of the deceased?		
3	**The mashirs were not independent residents of the locality — they were telephoned by you?**	💡 LHC 2025 — telephonic mashirs = doubtful recovery	⚠️ 'You hand-picked the mashirs — there was no independent or public witness to the recovery'
4	**You did NOT investigate the defence version that the accused was not present at the scene?**	💡 2026 SCLR 99 — IO admitted cross-version was correct	⚠️ 'A fair IO must investigate BOTH versions — you only investigated the prosecution's story'
5	**The recovered weapon was NOT forwarded to FSL within 24 hours — the delay was ___ days?**	💡 Chain of custody break	⚠️ 'In those ___ days between recovery and FSL submission, who had custody of the weapon?'
6	**You did NOT record in your case diary (s.172 CrPC) the reason for delay in recording s.161 statements?**	💡 Case diary omission = procedural violation	⚠️ 'The case diary should have explained every delay — it does not — this is a violation of s.172 CrPC'
7	**During cross-examination of co-accused, you admitted that their version of events was also consistent with the evidence?**	💡 2026 SCLR 99 — IO admitted cross-version correct in cross-examination	⚠️ 'You have admitted the cross-version may be true — this destroys any single-sided narrative'
8	**The challan u/s 173 CrPC was filed without including important forensic reports?**	💡 Incomplete challan — LHC Entry 45	⚠️ 'A challan without FSL, medical matching report, or complete investigation = defective investigation'
9	**You did NOT record the TIP (Test Identification Parade) before the accused was seen by eyewitnesses in judicial custody?**	💡 2025 SCMR 50 principle — post-arrest TIP worthless	⚠️ 'Once the witness has seen the accused in custody, any TIP is worthless — you knew this'
10	**The total investigation time from FIR to challan was only ___ days for a murder case?**	💡 Hasty investigation = one-sided	⚠️ 'A proper murder investigation cannot be completed in ___ days — this was a rushed, biased investigation'

📦 TRAP TECHNIQUE: THE IO SELF-DESTRUCTION TRAP (2026 SCLR 99 METHOD)

Step 1: Ask IO did he investigate the accused's cross-version. Step 2: Ask IO to read from his case diary his entries about the cross-version. Step 3: Establish that IO found the cross-version 'plausible' or 'could not be ruled out.' Step 4: Ask: 'You found the defence version credible yet you filed challan against accused?' Step 5: Cite 2026 SCLR 99 — 'In Saddam Hussain case, IO admitted under cross that cross-version was correct — Supreme Court set aside conviction.' Effect: IO's own admissions destroy prosecution.

📦 TRAP TECHNIQUE: THE BIASED INVESTIGATION TRAP

Step 1: List 10 things a proper IO SHOULD do (collect weapon, take photographs, measure scene, record all

witnesses, follow cross-version, send to FSL, etc.). Step 2: Ask IO which of these he did. Step 3: Mark each omission. Step 4: By end, establish IO did only 3-4 out of 10. Step 5: Argue: 'This investigation was a checklist filled in reverse — police first decided the accused was guilty, then collected only supporting evidence.' Effect: Investigation discredited as result-oriented.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

▶️ Cross with Complainant (W-1): IO delay in receiving FIR vs. FIR lodging time
▶️ Cross with Eyewitness (W-2): IO's delay in s.161 recording = this eyewitness's statement unreliable
▶️ Cross with Recovery Mashir (W-3): IO's telephonic mashirs = planted recovery
▶️ Cross with FSL (W-7): IO's delay in forwarding to FSL = tampering window

CITATION	LEGAL RATIO / PRINCIPLE
2026 SCLR 99	IO admitted cross-version was correct in cross-examination — conviction set aside. One-sided investigation is insufficient.
2025 CCJ 6	IO's failure to record s.161 statements immediately = fatal to eyewitness testimony.
LHC June 2025	Site plan omitting key positions + telephonic mashirs + delayed FSL = investigation destroyed.
2024 SCMR 929	Failure to produce available witnesses = adverse presumption against prosecution.

W-6: MOHARRAR / POLICE RECORD-KEEPER — CROSS-EXAMINATION

SECTION A — BACKGROUND QUESTIONS

Legal basis: Police Rules 1934 r.22.70 (General Diary), r.25.2 (FIR register), s.154 CrPC. Challenge: FIR entry time, malkhana register, any tampering in records.

1	You are the moharrar of Police Station ___?	Establish identity
2	You maintain the FIR register, the General Diary, and the Malkhana register?	Confirm records kept
3	The FIR was entered in the register at ___ time?	Confirm FIR entry time
4	FIR entry time matches the time written on the FIR?	Detect backdating
5	All recovered items are entered in the malkhana register on the same day?	Malkhana entry timing
6	The weapon recovered in this case — when was it entered in malkhana?	Specific entry time
7	The General Diary entry for this case was made at ___ time?	GD entry must precede FIR
8	FIR copies were sent to DSP/Magistrate within 24 hours as required by law?	s.157 CrPC compliance
9	There are no cuttings, overwriting, or alterations in the FIR register?	Record integrity
10	The case property was in sealed condition throughout its stay in malkhana?	Chain of custody

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**The time of FIR in the register is ___ — but the incident happened at ___ — there is a gap of ___ hours?**	💡 Establish delay through official record	⚠️ 'The register itself proves a delay of ___ hours — this is objective evidence of late reporting'
2	**The General Diary entry was**	💡 GD should precede FIR	⚠️ 'This means the incident was

	made AFTER the FIR was registered — not before?		never reported to GD first — procedure violated'
3	**The recovered weapon was entered in the malkhana register ___ days after the claimed recovery date?**	💡 Chain of custody gap	⚠️ 'So the weapon was not in malkhana for ___ days after recovery — where was it?'
4	**There are alterations in the FIR register at the entry for this FIR?**	💡 Tampering in official record	⚠️ Get the actual register produced in court if alterations visible
5	**FIR copies were not sent to the Magistrate within 24 hours as required by s.157 CrPC?**	💡 Statutory deadline missed	⚠️ 'This is a mandatory requirement — non-compliance shows the FIR was not genuine at that time'
6	**The case property was broken out of the malkhana before the official order of the court?**	💡 Malkhana breach	⚠️ 'Case property is only to leave malkhana on court order — who authorised its removal?'
7	**There are more than one FIR registered about this same incident — there is a cross-case?**	💡 Multiple FIRs about same event	⚠️ 'Two FIRs about the same event is the prosecution using police machinery to harass the accused'
8	**You cannot confirm that the same sealed parcel you received is the one that went to FSL?**	💡 Identity of evidence	⚠️ 'The seals on the malkhana register and the FSL report have different descriptions'
9	**The malkhana register was not updated for ___ days between receipt and dispatch to FSL?**	💡 Chain of custody gap revisited	⚠️ 'In those ___ unmapped days, anyone with malkhana key could have substituted the evidence'
10	**The FIR was written in identical handwriting to a later supplementary statement — suggesting pre-preparation?**	💡 Pre-drafted FIR	⚠️ 'A spontaneous FIR written in panic has corrections — a pre-drafted one is perfect. This is perfect.'

📦 TRAP TECHNIQUE: THE REGISTER AUDIT TRAP

Step 1: Request production of original FIR register, GD register, and malkhana register. Step 2: Compare entry times for FIR with stated time of incident. Step 3: Check GD entry time — it must precede or be simultaneous with FIR. Step 4: Check malkhana entry time for all case properties. Step 5: Any gap = 'Where was the evidence during this gap?' Effect: Official registers become weapons against prosecution — time gaps expose delay, tampering, or fabrication.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

- ▶️ Cross with IO (W-5): IO's stated visit time should match GD entry time
- ▶️ Cross with FSL (W-7): Malkhana dispatch time must match FSL receipt time
- ▶️ Cross with Complainant (W-1): FIR entry time vs. claimed time of reporting

W-7: FSL EXPERT (FORENSIC SCIENCE LABORATORY) — CROSS-EXAMINATION

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**The weapon was received by FSL on ___ — that is ___ days after the claimed recovery date?**	💡 Delay = tampering window	⚠️ 'You cannot confirm the weapon was not altered during those ___ days before reaching FSL'
2	**The seals on the parcel when received by FSL — were they intact and matching the description in malkhana record?**	💡 Chain of custody	⚠️ 'Any seal discrepancy means the parcel was opened between recovery and FSL — you cannot certify it'
3	**The weapon matched test bullets fired in the lab — but you did not test actual crime scene bullets?**	💡 No actual crime scene comparison	⚠️ 'Without actual crime bullets, you cannot say this weapon fired the fatal shot'
4	**No crime empties were sent to you for comparison?**	💡 LHC 2025 — no empties = no link	⚠️ 'Without crime empties, the FSL match is a lab exercise — not proof this weapon was used in the murder'
5	**You examined only what you were sent — you do not know if other weapons were present at the scene?**	💡 Limited scope of FSL	⚠️ 'Your report is only as complete as the evidence submitted to you — what was withheld from you, you cannot comment on'
6	**The blood on the recovered weapon — was it DNA-tested to match the deceased?**	💡 DNA testing not done	⚠️ 'Blood type alone (if tested) cannot establish the blood came from the deceased'
7	**The recovered weapon could have fired shots other than the fatal shot — you cannot exclude that?**	💡 Alternative weapon use	⚠️ 'This weapon could have been used in a hundred incidents — your report only shows it can fire, not when it last fired'
8	**Your report was sent ___ months after receiving the sample?**	💡 Delay in FSL report	⚠️ 'A ___ month delay in a murder case FSL report is unexplained — what was it doing in your lab?'
9	**The chemical analysis of the deceased's hands for gunshot residue was NOT done?**	💡 No GSR test — LHC 2025 standard	⚠️ 'A GSR test could have proved who fired — the IO did not request this; this omission benefits the accused'

10	**Your report does NOT exclude that the same injuries could have been caused by a different weapon of similar calibre?**	💡 Alternative weapon possibility	⚠️ 'So your report merely shows consistency — not exclusivity to this single weapon'

🪤 TRAP TECHNIQUE: THE MISSING CHAIN TRAP

Step 1: Establish recovery date and FSL receipt date. Step 2: Calculate gap. Step 3: Ask who had custody during gap. Step 4: Ask if seals were intact. Step 5: Note that crime bullets/empties were NOT sent. Step 6: Cite LHC 2025 — 'Recovery without forensic corroboration is weak evidence; FSL report without crime empties proves nothing.' Effect: FSL evidence becomes technical gap rather than proof.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

- ▶️ Cross with Recovery Mashir (W-3): Mashir must confirm sealing of weapon at time of recovery
- ▶️ Cross with Moharrar (W-6): Malkhana register must show entry and exit dates of weapon
- ▶️ Cross with IO (W-5): IO must explain why crime empties were not collected from scene

CITATION	LEGAL RATIO / PRINCIPLE
LHC Entry 49, June 2025	Recovery without forensic corroboration is weak evidence.
LHC Entry 37, June 2025	Recovery of weapon without crime empties has weak evidentiary value.
LHC Sabran Bibi 2025	Delayed forwarding of samples to PFSA casts doubt on tampering.

W-8: ARRESTING OFFICER — CROSS-EXAMINATION

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**The accused was arrested on ___ — how many days after the FIR?**	💡 Delayed arrest = no urgency in prosecution mind	⚠️ 'If police truly believed accused was the killer, why wait ___ days to arrest?'
2	**At the time of arrest, accused was NOT attempting to flee — you found him at his home?**	💡 No abscondence at time of arrest	⚠️ 'Dawn May 2026 SC — abscondence alone is not proof of guilt; accused was at home normally'
3	**No weapons were recovered from accused at the time of arrest?**	💡 No incriminating recovery at arrest	⚠️ 'The weapon came days later through a different process — not at arrest'
4	**The accused was not informed of grounds of arrest at the time of arrest?**	💡 Constitutional Art.10 violation	⚠️ 'This is a fundamental rights violation — Art.10 Constitution requires arrest grounds to be communicated'
5	**No memo of arrest was prepared at the time of arrest?**	💡 Police Rule violation — r.25.2	⚠️ 'Police Rules require a memo of arrest — without it, the arrest procedure is defective'
6	**The accused was not produced before a Magistrate within 24 hours of arrest?**	💡 s.61 CrPC — 24 hour rule	⚠️ 'Detention beyond 24 hours without Magistrate's remand is illegal detention'
7	**Before any Test Identification Parade, the eyewitness had already seen the accused in lockup?**	💡 Post-custody TIP = worthless — 2025 SCMR 50 principle	⚠️ 'Once witness sees accused in police custody, any subsequent identification is tainted'
8	**The accused's statement under s.161 CrPC was NOT recorded — only a confessional statement under duress?**	💡 Illegal confession — Art.37 QSO	⚠️ 'A confession obtained in police custody is presumed to be under coercion — it is inadmissible'
9	**You did not inform the accused of his right to engage a lawyer at the time of arrest?**	💡 Constitution Art.10-A — fair trial	⚠️ 'Right to counsel is a fundamental right — its denial taints all subsequent statements'
10	**The so-called disclosure statement leading to recovery — was it recorded in writing before the recovery?**	💡 Voluntary disclosure requirement	⚠️ 'If disclosure was not in writing BEFORE the recovery, the recovery has no legal basis'

🪤 TRAP TECHNIQUE: THE ABSCONDENCE DESTRUCTION TRAP

Step 1: Ask arresting officer: 'The accused was at his home when arrested?' Step 2: Ask: 'He was not hiding?' Step 3: Ask: 'No proclamation under s.87 CrPC was issued before arrest?' Step 4: Cite Dawn May 2026 SC (Muhammad Iqbal) — 'Running away is not proof of guilt; abscondence alone carries no weight where eyewitness account is doubtful; and questions about abscondence not put to accused u/s 342 CrPC = cannot be used.' Step 5: Note: No s.87/88 CrPC proceedings = no legal abscondence. Effect: Prosecution cannot argue abscondence as evidence of guilt.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

- ▶️ Cross with IO (W-5): IO ordered the arrest — why the delay?
- ▶️ Cross with Eyewitness (W-2): Were they shown accused in lockup before TIP?
- ▶️ Cross with Complainant (W-1): Did complainant confirm accused was at home before arrest?

CITATION	LEGAL RATIO / PRINCIPLE
Dawn May 2026 (Muhammad Iqbal v. State) Justice Ishtiaq Ibrahim J.	Abscondence alone is not proof of guilt — people flee for fear; it is at most corroborative. Not put to accused u/s 342 = cannot be used. No proceedings u/ss.87/88/204 CrPC = no documented abscondence.

W-9: TAPEDAR / PATWARI (REVENUE OFFICIAL) — CROSS-EXAMINATION

SECTION B — LEADING QUESTIONS WITH TRAPPING TECHNIQUE

1	**You prepared the site plan of the crime scene — on whose instructions?**	💡 Establish IO directed everything	⚠️ 'You are not an independent expert — you went where IO took you and drew what IO described'
2	**You did not independently measure the distances — you relied on what IO told you?**	💡 Site plan not independently verified	⚠️ 'Your plan reflects IO's version of events, not your independent survey'
3	**The site plan does not show the positions of the alleged eyewitnesses?**	💡 LHC 2025 — incomplete site plan	⚠️ 'How can this plan corroborate the ocular account if it doesn't show where witnesses stood?'
4	**The distance shown between the accused's alleged position and the deceased — is it to scale?**	💡 Scale accuracy	⚠️ 'A non-scale sketch cannot prove visibility claims — the eyewitness's claim of seeing at ___ metres is unverifiable'
5	**The plan was prepared ___ days after the incident — not immediately?**	💡 Delayed site plan	⚠️ 'The scene may have changed in ___ days — your plan may not reflect the scene at the time of crime'
6	**There are no measurements of lighting conditions noted in the plan?**	💡 Darkness / visibility not documented	⚠️ 'PHC 2025 — 150 paces in darkness = identification doubtful; your plan does not even note lighting conditions'
7	**The plan does not show blood stains, cartridge casings, or other physical evidence at exact spots?**	💡 Physical evidence location not mapped	⚠️ 'A proper crime scene plan marks physical evidence — yours does not, making it a mere sketch'
8	**You did not take photographs of the scene at the time of preparation?**	💡 No photographic evidence	⚠️ 'A photograph would have been conclusive — the absence of photographs weakens this plan entirely'
9	**No IO accompanied you to verify each measurement in writing?**	💡 IO certification of plan	⚠️ 'The plan was not countersigned by IO at time of preparation — whose plan is this really?'
10	**The plan shows a public road/pathway adjacent to the**	💡 Public access = no exclusivity	⚠️ 'Anyone could have been at this location — the plan does not restrict presence to the parties

	crime scene — accessible to everyone?		named'

🪤 TRAP TECHNIQUE: THE VISIBILITY DISTANCE TRAP

Step 1: Get tapedar to confirm distances on site plan. Step 2: Establish the distance between eyewitness position and accused's alleged position. Step 3: Ask about lighting conditions at time of incident. Step 4: Cite PHC BA 559-B/2025 — '150 paces at night without light source = identification highly doubtful.' Step 5: Ask doctor: 'At ___ metres in that lighting, is positive identification realistically possible?' Effect: Distance + darkness = identification evidence destroyed.

🔗 CROSS-REFERENCE TO OTHER WITNESSES

- ▶️ Cross with Eyewitness (W-2): Their claimed visibility must match tapedar's measured distances
- ▶️ Cross with IO (W-5): IO directed the site plan — any omissions are IO's responsibility
- ▶️ Cross with Doctor (W-4): Wound directions must be consistent with positions shown on site plan

CITATION	LEGAL RATIO / PRINCIPLE
PHC BA 559-B/2025 (12.12.2025)	150 paces at night without light source = identification highly doubtful. Single weapon but injuries on multiple body parts = inconsistent with prosecution story.
LHC June 2025	Site plan omitting recovery witnesses and seizing officer undermines entire recovery proceedings.

📊 CROSS-WITNESS RELEVANCE MATRIX — HOW WITNESSES DESTROY EACH OTHER

Use the contradictions between witnesses strategically. Each row shows which other witnesses can be used to undermine that witness.

WITNESS	CONTRADICTED BY	KEY CONTRADICTION THEME
W-1 Complainant	IO (delay in s.161), Eyewitness (additions to FIR version), Moharrar (FIR entry time)	FIR delay, omissions, motive to falsely implicate
W-2 Eyewitness	Doctor (wound vs. position), Tapedar (distance), IO (s.161 delay), Complainant (version difference)	Chance witness, dishonest improvement, unnatural conduct
W-3 Recovery Mashir	IO (telephonic call), FSL (no crime empties), Moharrar (malkhana timing)	Telephonic mashir, public place, no FSL corroboration
W-4 Doctor	Eyewitness (position vs. trajectory), Tapedar (scene distances)	Wound trajectory contradiction, time of death uncertainty
W-5 IO	All witnesses (procedural violations exposed through each)	Biased investigation, delayed s.161, incomplete challan
W-6 Moharrar	IO (GD entry time), FSL (malkhana dispatch delay), Complainant (FIR time)	Register gaps, chain of custody breaks
W-7 FSL	Recovery Mashir (sealing), IO (delayed dispatch), Moharrar (malkhana gap)	Chain of custody, no crime empties, delayed report
W-8 Arresting Officer	Eyewitness (TIP after custody), IO (arrest timing), Complainant (accused at home)	Post-custody identification, abscondence claim destroyed
W-9 Tapedar	Eyewitness (distances vs. visibility), Doctor (wound direction vs. position), IO (who directed plan)	Non-independent plan, no lighting data, no scale

10 MASTER TRAPPING TECHNIQUES FOR MURDER CASES

TRAP TECHNIQUE: TECHNIQUE 1 — THE FIR DELAY HAMMER

Exact incident time → Police station distance → FIR entry time → Calculate gap → No explanation = 2024 SCMR 929 adverse inference. 4-hour threshold. Even 10-hour gap = 2025 CCJ 6 fatal.

TRAP TECHNIQUE: TECHNIQUE 2 — THE SECTION 161 TRAP

Ask when s.161 statement recorded vs FIR date. Any delay beyond 24 hours = 2025 CCJ 6 — 'even one or two days is fatal to eyewitness testimony.' IO cannot escape — diary shows date.

TRAP TECHNIQUE: TECHNIQUE 3 — THE CHANCE WITNESS NEUTRALISER

Distance from scene → Reason for presence → Participation in medical formalities → Absence of independent corroboration = 2017 SCMR 596 — 'no specific reason to be at scene = chance witness.'

TRAP TECHNIQUE: TECHNIQUE 4 — THE DISHONEST IMPROVEMENT CONFRONTATION

Read s.161 verbatim → 'Is this your statement?' → 'Does it contain what you said in court today?' → No = dishonest improvement → QSO Art.140 confrontation → LHC 2025 — 'dishonest improvements reduce credibility.'

TRAP TECHNIQUE: TECHNIQUE 5 — THE MEDICAL CONTRADICTION TRAP

Get wound trajectory from doctor → Compare with eyewitness's account of position → Contradiction = 2026 SCLR 99 — 'parallel wound trajectory contradicted claim of downward shot from roof; conviction set aside.'

TRAP TECHNIQUE: TECHNIQUE 6 — THE TELEPHONIC MASHIR AMBUSH

'How were you informed about the recovery?' → 'By phone from police?' → 'Were any locals from the area present?' → No = LHC June 2025 Manzoor Ahmed — 'telephonic mashirs made recovery doubtful.'

TRAP TECHNIQUE: TECHNIQUE 7 — THE DOUBLE PRESUMPTION ARGUMENT

After cross-examination creates doubt: 'This accused was acquitted by trial court / is on bail = carries double presumption of innocence. Tribune June 2026 SC — appellate court should rarely disturb acquittal. Two reasonable conclusions = acquittal must prevail.'

TRAP TECHNIQUE: TECHNIQUE 8 — THE ABSCONDENCE DESTROYER

Was s.87/88 CrPC proclamation issued? → Was any attachment ordered? → No = Dawn May 2026 SC — 'no documented proceedings = no legal abscondence.' Was question about abscondence put to accused u/s 342? → No = 'Cannot be used against him.' People flee for fear, not guilt.

TRAP TECHNIQUE: TECHNIQUE 9 — THE IO SELF-ADMISSION TRAP

Ask IO if he investigated the cross-version → Ask what he found → If he found it plausible or did not rule it out → 2026 SCLR 99 Saddam Hussain — 'IO admitted cross-version was correct in cross-examination; Supreme Court set aside conviction on that basis.'

🪤 TRAP TECHNIQUE: TECHNIQUE 10 — THE MALKHANA REGISTER AUDIT

Production order for malkhana register → Compare recovery date with entry date → Entry date must match recovery date → Any gap = 'Where was the weapon during those days?' → Cite LHC 2025 Sabran Bibi — 'delayed forwarding to PFSA casts doubt on tampering.'

📖 MASTER JUDGMENT REFERENCE TABLE — 2024 TO 2026

CITATION	LEGAL RATIO / PRINCIPLE
2024 SCMR 929 (Shaukat Hussain v. State)	4-hour unexplained FIR delay = adverse inference. Police station nearby = delay inexcusable. Failure to produce available witnesses = adverse presumption. (Applied in 2025 CCJ 6)
2025 CCJ 6 = 2025 PCrLJ 57 (Muhammad Ikhlas v. State) BLH Court, Sept 2024	10-hour delay where PS was 1.5 km away = fatal. Delayed s.161 statement of eyewitness (even 1-2 days) = fatal. Witness with no reason to be at scene = chance witness needs corroboration. Prosecution not producing available witness = adverse presumption.
2017 SCMR 596 (Mst. Rukhsana Begum v. Sajid) [Applied in 2025 CCJ 6]	Eyewitness living far from scene with no specific reason to be present = chance witness requiring independent corroboration.
2024 SCMR 1224 (Riasat Ali v. State) [Applied in 2025 CCJ 6]	Witness claiming to take injured to hospital but medical records showing otherwise = unnatural conduct that discredits entire testimony.
2026 SCLR 99 = 2026 SCP 136 (Saddam Hussain v. State) SC of Pakistan, 27 April 2026 Justice Ishtiaq Ibrahim J.	Woolmington / Blackstone Ratio — better to acquit guilty than convict innocent. IO admitted cross-version correct in cross-examination = conviction set aside. Ocular-medical contradiction (roof claim vs. parallel wound) = fatal. Delayed post-mortem weakens prosecution timeline. Recovery from mosque = no exclusive possession.
Dawn May 2026 (Muhammad Iqbal v. State) SC 2-member bench Justice Ishtiaq Ibrahim J.	Abscondence alone is NOT proof of guilt. People flee for fear. No s.87/88 CrPC proceedings = no documented abscondence. Not put to accused u/s 342 = cannot be used. Single circumstance creating reasonable doubt = acquittal as matter of RIGHT. Material contradictions in evidence = prosecution fails.
Tribune June 2026 SC (Re: Double Presumption) Justice Muhammad Ali Mazhar J.	DOUBLE PRESUMPTION OF INNOCENCE on acquittal. Appellate court should rarely disturb acquittal. One single circumstance creating reasonable doubt = benefit of doubt. Where two reasonable conclusions possible, view favouring ACQUITTAL must prevail.
LHC Bulletin June 2025 (Multiple cases)	Dishonest improvements = reduced credibility. Telephonic mashirs = doubtful recovery. Recovery from public place = no exclusive possession. Site plan without key positions = useless. Delayed s.161 statements = fatal. Recovery without FSL corroboration = weak. No crime empties = weak recovery.
PHC BA 559-B/2025 (12 December 2025)	150 paces at night without light source = identification highly doubtful. Single weapon but injuries on multiple body parts = inconsistent with prosecution's narrative. Darkness + distance = identification evidence unreliable.
2017 SCMR 486 (Muhammad Asif v. State) [Applied in 2025 CCJ 6]	Even one or two days' unexplained delay in recording eyewitness's s.161 CrPC statement is fatal to eyewitness testimony.
LHC Bulletin June 2025 (Sabran Bibi v. State)	Delayed forwarding of samples to PFSA = doubt on tampering. Site plan omitting seizing officer and recovery witnesses = undermines entire recovery. Benefit of doubt as matter of right, not concession, where defence may be true.
LHC Bulletin June 2025 (LHC Entry 37)	Abscondance alone does not prove guilt. Contradictions between ocular and medical evidence lead to disbelief against ALL accused. Weapon without crime empties = weak evidentiary value.

— END OF MASTER CROSS-EXAMINATION HANDBOOK —

Syed Zeshan Hashmi (Advocate) — Peshawar High Court

The Arbitrator & Law Associates | Opposite Prime Hospital, Ring Road, Peshawar

📞 0313-4859592 | 🌐 arbitratorandlaw.com

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