

The Forensic Science Laboratory Report in Pakistani Criminal Trials: Chain of Custody, Firearm and Blood Reports, Digital Evidence and the Cross-Examination of the Expert. A Study of the Supreme Court and the Peshawar High Court (1994–2026)

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Abstract

A report from the Forensic Science Laboratory (FSL), the Forensic Science Agency, the Chemical Examiner, the Serologist or the Firearm Expert is the one piece of prosecution evidence that looks scientific, and trial courts often treat it as conclusive. The reported law is more careful. The Supreme Court and the Peshawar High Court read the report only as a statement about the article that reached the laboratory, and they require the prosecution to prove, link by link, that the article that reached the laboratory is the article that was seized. This paper follows the reported law in four phases, from the early view that expert reports merely corroborate, through the Supreme Court's decisions on the chain of custody in narcotics cases (2018 onwards) and on crime empties sent after the arrest of the accused (2022 onwards), to the 2025–2026 decisions that insist on the register, the carrier and the Moharrir. It draws on 102 judgments set out in Annexure A: 46 on narcotics reports and the chain of custody (27 of the Supreme Court and 19 of the Peshawar High Court), 38 on firearm, empties, blood and serology reports (18 and 20), and 18 on audio and video, CCTV, voice, mobile phone, DNA, fingerprint, handwriting and section 510 of the Code of Criminal Procedure. Annexure B gives practical points for recording and testing evidence, and Annexure C explains one hundred terms used in the judgments. All research was done on the Pakistan Law Site only. The paper also sets out the authorities that go the other way, where a delay or a gap was held not to be fatal.

Keywords: Forensic Science Laboratory; Forensic Science Agency; Chemical Examiner; Government Analyst; chain of custody; safe custody and safe transmission; Moharrir; crime empties; firearm expert; serologist; blood group; DNA; CCTV; audio and video evidence; voice identification; Rule 4(2); Article 164; section 510 Cr.P.C.; Peshawar High Court.

1. Introduction

When the police recover a packet of charas, a pistol, a handful of empties or a blood-stained garment, they seal it and send a part of it to a laboratory. The laboratory writes a short report: the substance is charas, the empties were fired from this pistol, the blood is human and of group B. Prosecutors treat the report as the end of the matter. For the defence, the report is the beginning of the cross-examination, because the laboratory examined only what it was given, and nobody from the laboratory can say what the police did before the parcel was handed over.

Since 2018 the Supreme Court has said, in many different benches, that the prosecution must prove each step between the seizure and the laboratory: the separation and sealing of the sample, the entry in the register, the custody in the malkhana, the dispatch with a road certificate, the carrier, and the receipt at the laboratory. If any link is missing the benefit goes to the accused, and a positive report is of no value. In firearm cases the Court has applied the same logic to crime empties, holding that if they are sent after the arrest of the accused or together with the weapon, the report loses its evidentiary value and "smacks of foul play". In the same period the Court has laid down the conditions on which an audio or video recording may be relied on, and has said that voice recognition is unreliable without forensic support.

This paper is written for the trial table. Sections 3 to 8 give the law, section 9 gives the authorities that go the other way, and Annexure B turns the law into questions to put to each witness.

2. Sources and Method

Every judgment in this paper was found and read on the Pakistan Law Site, and nothing was taken from any other source. About four hundred and fifty judgments were retrieved and read in digest, and the 102 cited in Annexure A are the ones that bear most directly on the topic. A dagger (†) in Annexure A marks an entry based on the head-note and extracts of the judgment; the unmarked entries were read at greater length, in particular Ishtiaq Ahmed Mirza (PLD 2019 SC 675), the source of the audio and video requirements in section 8.7. Benches and dates were taken from the text of each judgment. The outcome of each case is taken from the operative part of the judgment, not from the closing label that the site prints. Coverage before 2000 on the site is thin on this subject: only Zarif Khan (PLD 1994 Peshawar 176) of the entries in Annexure A predates 2000, and Muhammadullah (PLD 2001 Peshawar 132) was decided a few months after. Please read the full text of a judgment before citing it in court.

3. The Statutory Framework

- **Control of Narcotic Substances Act, 1997 (CNSA).** Section 9 creates the offences (section 9(c) for the quantities most often charged), section 29 raises a presumption against a person found in possession, which the Court will not invoke where the prosecution's own case falls short (Raham Gul, 2026 SCMR 584), and section 36 makes the report of the Government Analyst admissible without formal proof. The Khyber Pakhtunkhwa Control of Narcotic Substances Act, 2019 (sections 9(d), 11(b) and 11(c) in the cases read) governs in this province from its date.
- **Control of Narcotic Substances (Government Analysts) Rules, 2001.** Rule 3 deals with the qualification of the Government Analyst. Rule 4(2) says that samples may be dispatched for analysis under cover of a Test Memorandum in Form-I at the earliest but not later than seventy-two hours of the seizure. Rules 5 and 6 deal with the receipt of the sample and the contents of the report: it must show the tests and analysis, the result of each test and the protocols applied (Khair-ul-Bashar, 2019 SCMR 930).
- **Police Rules, 1934, Rule 22.70, and Register No. XIX.** Case property must be kept in the malkhana and entered in Register No. XIX; its dispatch to a laboratory is recorded with a road certificate (Jeehand, 2025 SCMR 923).
- **Section 510, Cr.P.C.** makes the report of the Chemical Examiner and similar experts admissible without calling them, but the court may summon the expert on its own motion or at the request of a party. **Section 540** (recall) and **section 342** (examination of the accused) are the other provisions used at the trial.
- **Articles 59, 129(g) and 164, Qanun-e-Shahadat Order, 1984.** Article 59 deals with expert opinion; Article 129(g) allows the court to presume that evidence withheld would be unfavourable (used for the missing Moharrir or carrier); Article 164 permits evidence made available by modern devices, and the Supreme Court has set out the requirements in PLD 2019 SC 675.
- **Punjab Forensic Science Agency Act, 2007, section 9(3).** A report of the Provincial Forensic Science Agency is per se admissible; the Peshawar High Court applied the provision in PLD 2025 Peshawar 50. No equivalent Khyber Pakhtunkhwa provision was found in the judgments read, and counsel should check the position for a report from a laboratory outside Punjab.
- **Pakistan Arms Ordinance, 1965 (section 13(e)) and Khyber Pakhtunkhwa Arms Act, 2013 (sections 15 and 15-AA)** are the weapon offences that appear alongside murder and narcotics charges.
- **Penal Code**, sections 302, 324, 337-A to 337-F and 365-A, are the main offences in the firearm and blood cases.

4. Phase One (to 2005): The Report as Corroboration

The early decisions treat the expert's report as support for the ocular account, not as a substitute for it. In Zarif Khan (PLD 1994 Peshawar 176) the Ballistic Expert's positive report fully corroborated a simple and straightforward account in a single-accused case, and the Court added that medical opinion is not conclusive and must be tested against the principles of medical jurisprudence and firearms. In Muhammadullah (PLD 2001 Peshawar 132) the Chief Justice's bench held that the recovery of a shotgun from the accused and of empties from the spot, with a positive Ballistic report, could at best prove that the gun was used, not that the accused used it, and that the report had no value

in any event because the gun and the empties had been dispatched to the expert after a month. In *Jana Gul* (2002 PCrLJ 1490) the Bench applied section 510 and held that failure to show who carried the sample to the laboratory was an irregularity that did not vitiate the trial. In *Sardar Khan* (PLD 2005 Peshawar 166) the Bench held that the entire quantity recovered need not be sent to the Chemical Examiner and a meagre part was enough. The common theme is that the report corroborates; the law on the carrier and the register is still undeveloped.

5. Phase Two (2006–2017): The First Doubts About Delay and Method

From 2006 the Peshawar High Court began to examine how and when the articles reached the laboratory. In *Atif Khan* (2006 MLD 532) the Court accepted the serologist's and the firearms expert's reports because there was no delay in sending the empties and the rifle to the laboratory; the point is stated by implication, that delay would have mattered. In *Hayatullah Khan* (2011 SCMR 1354) the Supreme Court held that the Investigating Officer cannot decide whether the medical evidence corroborates or what an expert's report is worth; those are questions for the trial court. The Peshawar High Court in *Sher Umar Khan* (PLD 2015 Peshawar 143) held that the recovery of a gun and a report on its working condition are of no help where no crime empty was found, and in *Ashraf Ali* (2016 PCrLJ Note 63) that a negative report on the empty and the pistol negated the prosecution version.

In 2017 the Supreme Court delivered two decisions within two days of each other (18 and 20 January) that set the pattern for later cases. In *Javed Khan alias Bacha* (2017 SCMR 524) the Court found doubt about when and how the weapon and bullet casing were delivered to the laboratory, because the pistol was sent on 7.1.2002 and the accused's disclosure was said to have been made on 14.10.2001. In *Muhammad Asif* (2017 SCMR 486) the Court held that mere sending of blood-stained weapons to the Chemical Examiner and the Serologist does not serve the prosecution unless the blood-stained earth or cotton and the victim's clothes go with them, so that the group can be compared.

6. Phase Three (2018–2021): The Chain of Custody Becomes a Rule of Law

The turning point is *The State through Regional Director ANF v. Imam Bakhsh* (2018 SCMR 2039), in which a bench of three (*Asif Saeed Khan Khosa, Maqbool Baqar and Syed Mansoor Ali Shah*) held that the chain of custody begins with the recovery of the drug and includes the separation of the representative sample and its dispatch to the laboratory, and that it is pivotal because the whole construct of the Act and the Rules depends on it. A series of decisions followed within three years. *Khair-ul-Bashar* (2019 SCMR 930) required the Government Analyst's report to show the tests, the results and the protocols (Rule 6). *Razia Sultana* (2019 SCMR 1300) held that where the chain is broken the Chemical Examiner's report loses its reliability. *Zahir Shah alias Shat* (2019 SCMR 2004) acquitted an accused because the constable who delivered the parcel was not produced. *Mst. Sakina Ramzan* (2021 SCMR 451) held that a forwarding letter is not proved without its author, the warehouse in-charge and the officer who recovered the drug. *Zubair Khan* (2021 SCMR 492) held a duplicate report inadmissible. In the Peshawar High Court, *Aman-ul-Haq* (2020 PCrLJ 1263) examined whether the report was in the prescribed form, and the Court said that it may test the form of the report even if the accused has not rebutted it.

The Supreme Court did not move in one direction. *Hussain Shah* (PLD 2020 SC 132) upheld the conviction of a driver of a truck with a secret cavity where public servants gave a consistent account and the Chemical Examiner's report was positive, while acquitting a passenger because conscious possession was not proved. And in *PLD 2019 SC 675 (Ishtiaq Ahmed Mirza)* the Court set out the requirements for audio and video evidence (section 8.7 below), a decision that has been applied in the Peshawar High Court since.

7. Phase Four (2022–2026): Dates, Registers and Carriers

The recent decisions are shorter and harder. In *Nawab Siraj Ali* (2023 SCMR 16, decided 18.10.2022) and *Sarfraz* (2023 SCMR 670) the Supreme Court held that if the crime empty is sent to the laboratory after the arrest of the accused or together with the crime weapon, the positive report loses its evidentiary value; sending them together is not a safe way to sustain a conviction and smacks of foul play on the part of the Investigating Officer. The rule has since been applied to: a delay of 37 days in sending empties to the expert after the arrest (*Ibrar*, 2026 SCMR 476); empties

deposited on the date of the arrest (Iftikhar Ahmed, 2026 SCMR 1010); empties and pistol deposited together (Ghulam Mustafa, 2025 SCMR 1633; Khair Muhammad, 2025 SCMR 1599); and delayed submission after the recovery of the weapon (Muhammad Imtiaz Baig, 2024 SCMR 1191).

In narcotics cases the Court has moved from stating the rule to demanding the record. Muhammad Hazir (2023 SCMR 986) and Said Wazir (2023 SCMR 1144) acquitted where the parcels reached the laboratory three or four days after the recovery and neither the Moharrir nor the carrier was produced. Asif Ali (2024 SCMR 1408) said that the prosecution must establish each step, and that failure to produce the transmitting witness can cast away the entire prosecution case. Jeehand (2025 SCMR 923) required Register No. XIX and the road certificate. Zakir Ali (2025 SCMR 1644) treated non-production of the official who carried the murasila and the case property to the police station as a serious blow. Mehmood Khan (2026 SCMR 1606) held that withholding of the register entries and the Moharrir cannot be brushed aside, and Abdul Raheem (2026 SCMR 1516) turned to the seals on the parcels produced in court. The Peshawar High Court has followed this line in Mehboob Ali (2023 YLR 2579), Muhammad Raziq (2025 YLR 26) and State v. Safiullah Khan (2025 YLR 506), and on 72 hours in Hamid Ullah (2026 YLR 229).

8. Thematic Analysis

8.1 The report speaks only about the sample

The laboratory examines what reaches it. The first question to put to every prosecution witness in a narcotics case is therefore not whether the substance is charas but whether the substance tested is the substance seized. The Supreme Court says in Imam Bakhsh that the chain begins at the recovery, and it asks for evidence of sample separation, sealing, malkhana entry, dispatch and receipt. The prosecution proves these steps through the seizing officer, the Moharrir and the carrier. If the evidence of any one of them is missing or does not fit the others, the report carries no weight.

8.2 The Moharrir and the carrier

The Moharrir (the police station clerk in charge of the malkhana and the registers) and the carrier constable (who takes the parcel to the laboratory) are the two witnesses whose absence has most often led to acquittal: Zahir Shah (2019), Sakina Ramzan (2021), Hazir (2023), Said Wazir (2023), Asif Ali (2024), Muhammad Raziq (PHC, 2025). In Farman Ali (2025 SCMR 1730) the carrier was not even on the calendar of witnesses under section 173, and the laboratory's report gave only a number for the person who deposited the parcels. The Peshawar High Court in Muhammad Raziq drew an adverse inference under Article 129(g). In the cases where the chain was upheld, the Moharrir had made an entry in Register No. 19, the carrier took a rahdari or road certificate, and the laboratory's stamped receipt came back (Haris, 2023 MLD 924; Asad Khan, 2026 PCrLJ 781; Khan Zada, 2024 MLD 1645).

8.3 Time: Rule 4(2) and the "intervening period"

Rule 4(2) fixes seventy-two hours. The Supreme Court has used it in bail (Sagheer Ahmed, 2024 SCMR 913: delay of over a month, no record of the person to whom the drug was handed, further inquiry) and the High Court has done likewise (Hamid Ullah, 2026 YLR 229: ten days and no name in Register XIX). In trials the courts consider not only the length of the delay but the absence of an explanation: three days (Hazir), four days (Said Wazir), eight days (Muhammad Saeed, 2023 MLD 373), fourteen days (Safiullah Khan, 2025 YLR 506), and a month (Said-ur-Rehman, 2026 SCMR 955, for an axe and a knife). On the other side, three days from a recovery on 21.8.2021 to receipt on 24.8.2021 was treated as compliance for all intents and purposes in Kashmaloo (2024 PCrLJ 174).

8.4 Sampling and the form of the report

Sardar Khan (PLD 2005 Peshawar 166) says that a part of the recovery is enough, but the later cases ask how the sample was drawn. State v. Javed Iqbal (2021 YLR 662) refused to rely on 4 g taken from five packets of charas, and noted the monogram on the seals was not that of the seizing officer. Hasrat Khan (PLD 2024 SC 911) holds that where a single consolidated sample of 3.200 kg was taken from 320 kg, only the quantity of the sample could be considered for sentence. Jeehand raises a similar concern about a collective report on all samples. Under Rule 6 and section 36 the

report must show the tests, the results and the protocols (Khair-ul-Bashar; Aman-ul-Haq), and a duplicate is not admissible (Zubair Khan). Muhammad Ikram (2023 PCrLJ 635) is the reminder that a request for a fresh test made in the middle of the trial, on the strength of counsel's observation, will not be granted where a report is already on the file.

8.5 Firearm expert and crime empties

The rule in Nawab Siraj Ali and Sarfraz is that the report is of no value if the empties go to the laboratory after the arrest or with the weapon. It is easy to apply and the Court applies it mechanically: put the dates of the recovery of the empties, the arrest, the recovery of the weapon and the laboratory receipt in one table. The Peshawar High Court uses it in Fazal Dayan (2021 YLR Note 106), Noor Zaman (2021 YLR 1711), Muhammad Nawaz (2020 YLR 669), Tasir Ullah (2018 YLR Note 182) and Arshad Ali (2024 MLD 212). Other points the cases make: the empties must be sent for comparison at all (Hazaray Khan, 2024 SCMR 2042, with an adverse presumption); a report on the working condition of a gun proves only that it can fire (Rafaqat Ali, 2024 SCMR 1579; Sher Umar Khan); a match is weak without an independent witness to the recovery (Kaleem Ullah, 2026 MLD 637); the empties should be shown on the site plan at the points alleged (Riasat Ali, 2024 SCMR 1224); and empties recovered on the police's second visit need an explanation (Fateh Khan, 2025 SCMR 1408). The expert's report can also help the defence by showing that the empties came from one weapon where the prosecution says two accused fired (State v. Subhan Ali, 2020 MLD 1901) or that no more than the expected number of weapons were used (Mukhtaj, 2022 MLD 384).

8.6 Blood, serology and the Chemical Examiner

Muhammad Asif (2017 SCMR 486) states the practice: blood-stained earth, cotton and the victim's clothes must be sent with the weapon, so that the Serologist can say that the blood on the weapon is human and of the same group. In Abid (2025 SCMR 1710) the Court held that a report of "the same group" is not enough when the group of the deceased is not proved. In Tasir Ullah and Said-ur-Rehman delay deprived both blood and empties reports of value. The positive side is Atif Khan (2006 MLD 532) and Ramzan Sharif (2018 MLD 1860), where the serology report fixed the scene and the empty matched, and the Court held that an unbroken technical chain was overwhelming.

8.7 Audio, video, CCTV, voice and mobile phones

PLD 2019 SC 675 sets out the requirements: the recording must be proved genuine and untampered; a report of the Provincial Forensic Science Agency is admissible under section 9(3) of the 2007 Act; under Article 164 the court has a discretion to allow the evidence; the person who made the recording must be produced, must produce the tape himself and identify the voices and persons; the tape must be played in court, be audible or viewable, be relevant, and have its safe custody, source and date of acquisition proved; the transcript must be prepared under independent supervision; a tape produced late is looked at with suspicion; and a formal application is needed. Applied: the Supreme Court refused to treat unaudited CCTV as legal basis for a penalty (Mian Khan, 2021 SCMR 1077) and relied on audited footage, hard disk and DVR in PLD 2026 SC 251 (Zahir Zakir Jaffar). The Peshawar High Court permitted a request after closure of evidence for a forensic examination of a video (PLD 2025 Peshawar 50). On voice, the Supreme Court said that voice recognition lacks a standardized scientific framework and cannot be relied on alone (Imtiaz Naeem, 2025 SCMR 744), and the Peshawar High Court that identification by voice is the weakest type of evidence (Sahib Shah, 2024 PCrLJ 396). Mobile phones appear as exhibits sent to the laboratory (Umer Khan, 2022 SCMR 216), as a source of an alibi that was itself sent for forensic examination (Zaram Khan, 2026 YLR 186), and as missing links where the phone was never sent (Muhammad Aslam, 2023 SCMR 397; Azeem Khan, 2016 SCMR 274).

8.8 DNA, fingerprint and handwriting

Reported criminal decisions on DNA are few in the material read: Muhammad Aslam (2023 SCMR 397) shows the cost of not doing a DNA or grouping test in a rape bail case, and PLD 2026 SC 251 shows a DNA report used with CCTV. On fingerprints, Ghulam Fareed (2024 SCMR 202), a civil case, shows the method: the document was sent to the Provincial Finger Print Bureau and a witness from the Bureau was produced. On handwriting, the defence has used the comparison of the complainant's handwriting with the murasila and recovery memo in Aslam Khan (2021 PCrLJ 1018), and the scribe's admission that the murasila is not in his handwriting in Syed Zahir Hussain (2018 YLR Note

186) and Muhammad Yousuf (2026 PCrLJ 1427).

8.9 Section 510 and the expert in the witness box

The old rule that the report is admissible without calling the expert (Jana Gul, 2002 PCrLJ 1490) is still the law, but the courts now expect the carrier to be proved and read the report critically. The defence decides whether to ask the court to summon the expert under the same section. In Aman-ul-Haq the Peshawar High Court said that the court is free to examine whether the report meets the requirements of the Act and the Rules even if the report is not rebutted.

9. The Authorities That Go the Other Way

The prosecution has strong authorities. Hussain Shah (PLD 2020 SC 132) and Haider Mehar (2024 SCMR 1471) show that when official witnesses give a consistent account of the raid, search, sampling, transmission and custody, the Court will accept it. Zeeshan Khan (2026 SCMR 1697) says that non-recording of a video of the recovery is not by itself a ground for bail or acquittal. Gul Muhammad (2026 SCMR 1395) accepted proof through the IO and the Moharrir. Riaz (2026 SCMR 980) held that non-recovery of some empties from a crowded scene is inconsequential. Khalid (2018 MLD 398) and Shoukat Ali (2020 YLR 1536) say that where direct evidence is credible the expert's opinion is corroborative only. Jana Gul says that the omission to show who took the sample is not fatal. In the Peshawar High Court, Ghulam Jan (2023 YLR 1786), Haris (2023 MLD 924), Khan Zada (2024 MLD 1645), Asad Khan (2026 PCrLJ 781) and Kashmaloo (2024 PCrLJ 174) upheld convictions on a complete record. Hazrat Noor (2025 YLR 1371) used a positive report to show that more than one weapon was fired. The defence cannot rely on a technical point alone; it needs a concrete gap.

10. Practical Guide

10.1 For the defence

- Put every date on one line: recovery, sealing, Register XIX entry, dispatch, receipt at the laboratory, report, and, for firearms, the arrest and the recovery of the weapon.
- Read the report against Rule 6 and section 36: tests, results, protocols, prescribed form, original and not a duplicate.
- Insist that the Moharrir, the carrier and the seizing officer each be produced, and check each hand-over against the next witness. Ask for the register itself.
- For firearms, ask whether the empties went to the laboratory before the weapon was recovered and the accused arrested.
- For blood, ask for the blood group of the deceased and whether the earth and clothes were sent with the weapon.
- For a recording, test every item in the requirements in PLD 2019 SC 675, and consider an application for forensic examination under Article 164.
- Where the case rests on voice identification, argue that it is the weakest evidence and demand a forensic comparison.
- At bail, use Rule 4(2) and the absence of a report to show a case of further inquiry.

10.2 For the prosecution

- Keep one file for each article: seizure memo, seal, register entry, road certificate, receipt, report.
- Cite the carrier and the Moharrir in the calendar of witnesses and produce both.
- Send the empties for comparison before the weapon is recovered and the accused is arrested, or at least separately and promptly, and keep a record of why.
- Send blood-stained earth, clothes and the weapon together, and prove the deceased's blood group.

- Produce the original report, with its protocols, and the expert if the defence applies.
- For a recording, produce the person who made it, play it in court, prove the custody and the source, and get the forensic report.

11. Open Questions

The reported law leaves several questions open. First, how many days of delay beyond seventy-two hours are fatal: the cases decide on their facts and the Court has not fixed a limit. Second, whether the seventy-two hours of Rule 4(2) apply to the Khyber Pakhtunkhwa Act of 2019 in the same way; the cases read apply the Rule under both Acts. Third, whether the Peshawar High Court will follow the Supreme Court's strict view on chain of custody in non-narcotics cases (a blood sample, a mobile phone). Fourth, whether a positive DNA report requires proof of the chain in the same manner; the decisions read do not decide this. Fifth, the position of a forensic report from an agency that is not a provincial agency under section 9(3) of the Punjab Act. Counsel should check each point on the day.

12. Conclusion

The law now treats a forensic report as the last link in a chain rather than as proof of the offence. For the defence, the work is to find and test the other links: the register, the carrier, the Moharrir, the seals, the dates. For the prosecution, the work is to produce them. Where the links are produced and consistent, the Supreme Court and the Peshawar High Court have upheld convictions; where they are not, the benefit of doubt has followed with a regularity that the reported cases make plain.

Annexure A: 102 Judgments in Question-and-Answer Form

Annexure A has 102 entries in five parts: Parts I and II cover narcotics, the Chemical Examiner or Government Analyst report and the chain of custody (Supreme Court, then Peshawar High Court); Parts III and IV cover firearm expert, crime empties, serology and blood reports (Supreme Court, then Peshawar High Court); Part V covers audio and video, CCTV, voice, DNA, mobile phone, fingerprint, handwriting and section 510 Cr.P.C. Each entry gives the citation with bench and date, a short question, and an answer that begins with the provisions involved. A dagger (†) means the answer is based on the head-note and extracts of the judgment, not the full text.

Part I: Narcotics, Chemical Examiner / Government Analyst / FSL report and chain of custody. Supreme Court of Pakistan

No.	Citation	Question	Answer
1	The State through Regional Director ANF v. Imam Bakhsh and others, 2018 SCMR 2039 (Asif Saeed Khan Khosa, Maqbool Baqar, Syed Mansoor Ali Shah JJ; 3.10.2018) †	Where does the chain of custody begin in a narcotics case, and why does the Supreme Court call it pivotal?	Provisions: s. 9, Control of Narcotic Substances Act 1997 (CNSA); Rr. 5 and 6, Control of Narcotic Substances (Government Analysts) Rules 2001. The chain begins with the recovery of the drug by the police and covers the separation of the representative sample(s) and their dispatch to the Narcotics Testing Laboratory. It is pivotal because the whole construct of the Act and the Rules rests on it: the laboratory report speaks only about the sample it received, so the prosecution must prove that the sample came from the seized drug and was not touched on the way. The State's appeals against acquittal were dismissed. This is the case later benches cite first.
2	Khair-ul-Bashar v. The State, 2019 SCMR 930 (Asif Saeed Khan Khosa CJ, Mushir Alam, Syed Mansoor Ali Shah JJ; 8.4.2019) †	What must a Government Analyst's report contain before a court can rely on it?	Provisions: s. 36(1), CNSA 1997; R. 6, Control of Narcotic Substances (Government Analysts) Rules 2001. The report must show, first, the tests and analysis of the alleged drug; secondly, the result of the tests; and thirdly, the test protocols applied. These three are the fundamental and core elements of a valid report. Where R. 6 is not complied with and any of them is missing, the report cannot safely be treated as proof of the nature of the substance. Appeal allowed. In practice: ask for the original report and read it against R. 6 before the witness is in the box.
3	Mst. Razia Sultana v. The State and another, 2019 SCMR 1300 (Manzoor Ahmad Malik, Syed Mansoor Ali Shah, Qazi Muhammad Amin Ahmed JJ; 14.5.2019) †	The sealed samples reached the Chemical Examiner, but the link between the police and the laboratory is not proved. What is the value of the positive report?	Provisions: s. 9(c), CNSA 1997; Rr. 5 and 6, Government Analysts Rules 2001. Where the chain of custody is broken, the report of the Chemical Examiner loses its reliability and it becomes unsafe to rest a conviction on it. The Court looked at safe custody and transmission of the samples from the police to the Chemical Examiner and found the evidence wanting. Appeal allowed. A positive report is therefore only as good as the evidence of how the parcel travelled.
4	Zahir Shah alias Shat v. The State through A.G. Khyber Pakhtunkhwa, 2019 SCMR 2004 (Manzoor Ahmad Malik, Syed Mansoor Ali Shah, Qazi Muhammad Amin Ahmed JJ; 2.5.2019) †	Ten kilograms of charas were recovered, but the constable who delivered the sealed parcel to the laboratory was not produced. What follows?	Provisions: s. 9(c), CNSA 1997; Rr. 5 and 6, Government Analysts Rules 2001. The prosecution did not produce the constable who carried the sealed parcel to the Forensic Science Laboratory. Safe custody and safe transmission of the drug from the place of recovery to the laboratory were therefore not proved, the report of the Government Analyst could not be used, and the conviction (ten years) was set aside. The carrier is the witness the defence should always ask for in the list of witnesses under s. 173 Cr.P.C.
5	Hussain Shah and others v. The State, PLD 2020 SC 132 (Asif Saeed Khan Khosa CJ, Faisal Arab, Qazi Muhammad Amin Ahmed JJ; 20.9.2019) †	Contra authority: when do consistent official witnesses and a positive Chemical Examiner report suffice, and what about a passenger in the vehicle?	Provisions: s. 9(c), CNSA 1997; Art. 185 Constitution. A truck driven by the accused was intercepted and about 12,000 kg of charas were found in a secret cavity. The driver's conviction was upheld because the Chemical Examiner's report declared the substance charas, the raiding party were public servants with no reason to falsely implicate him, and their account was consistent and unshaken. The passenger, Abdul Sattar, was acquitted because conscious possession or knowledge was not proved and a passenger cannot be convicted only for being in the vehicle. Use this against a defence that has nothing but the label "police witnesses".

No.	Citation	Question	Answer
6	Mst. Sakina Ramzan v. The State, 2021 SCMR 451 (Manzoor Ahmad Malik, Mazhar Alam Khan Miankhel, Syed Mansoor Ali Shah JJ; 6.1.2021) †	A letter said 43 sealed samples were forwarded to the Chemical Examiner, but its author and the warehouse in-charge were never examined. Is that enough?	Provisions: s. 9(c), CNSA 1997; Rr. 5 and 6, Government Analysts Rules 2001. No. The letter of the Superintendent (Preventive Service) was not proved through its author, and without the evidence of the warehouse in-charge and of the officer who recovered the drug about delivery of the samples to the Chemical Examiner, safe transmission could not be inferred from the report alone. Appeal allowed. This is the leading case for the proposition that a forwarding letter or a receipt is only paper until the person who wrote it or carried it testifies.
7	Zubair Khan v. The State, 2021 SCMR 492 (Maqbool Baqar, Mazhar Alam Khan Miankhel, Qazi Muhammad Amin Ahmed JJ; 21.1.2021) †	The prosecution produced a duplicate laboratory report and did not call the official who delivered the samples. Can the conviction stand?	Provisions: s. 9(c), CNSA 1997; s. 36 and R. 6 of the Rules 2001 (report in prescribed form). The prosecution failed to establish the essential link of safe transmission of the samples to the Chemical Examiner because the official who delivered them did not enter the witness box despite opportunity, and it relied on a duplicate forensic report which was inadmissible. Petition converted and allowed. Check on every file: is the exhibited report the original, and who is the person who deposited it?
8	Muhammad Hazir v. The State, 2023 SCMR 986 (Sardar Tariq Masood, Amin-ud-Din Khan, Shahid Waheed JJ; 1.3.2023) †	Recovery was on 10.2.2015 and the parcels reached the laboratory on 13.2.2015 with no word on where they stayed. What is the effect?	Provisions: s. 9(c), CNSA 1997; Rr. 4(2) and 5, Government Analysts Rules 2001. Neither the Moharrar who kept the parcels nor the constable who deposited them at the laboratory was produced, and the prosecution was silent about the three intervening days. Safe custody and safe transmission were not established and the appellant was acquitted. The question to put to the Moharrar and the IO is simply: "Where were the parcels between recovery and the laboratory, and who held the key?"
9	Said Wazir and another v. The State, 2023 SCMR 1144 (Sardar Tariq Masood, Amin-ud-Din Khan, Muhammad Ali Mazhar JJ; 8.5.2023)	Recovery on 9.6.2016, receipt at the chemical examiner's office on 13.6.2016, and the Moharrar and the carrier constable were not examined. Is the positive report safe?	Provisions: s. 9(c), CNSA 1997; Rr. 4(2) and 5, Government Analysts Rules 2001. The Supreme Court held that the unexplained gap, together with the non-production of the Moharrar who kept the parcel in the malkhana and of the constable who delivered it, left safe custody and safe transmission unproved. Benefit of doubt was given and both appellants were acquitted. The judgment ends with the general rule: where a link in the chain is missing the prosecution cannot be said to have proved its case beyond reasonable doubt.
10	Sagheer Ahmed v. The State, 2024 SCMR 913 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Musarrat Hilali JJ; 13.3.2024) †	In a bail matter, does a delay of more than a month in sending samples to the Forensic Science Laboratory matter?	Provisions: s. 497 Cr.P.C.; s. 9(1), Sr. No. 3(c), CNSA 1997; R. 4(2), Government Analysts Rules 2001; Art. 185(3) Constitution. R. 4(2) says samples may be dispatched under cover of Test Memorandum (Form-I) at the earliest but not later than seventy-two hours of the seizure. The accused was arrested on the day of the FIR, yet the sample reached the Punjab Forensic Science Agency after more than a month and nothing showed to whom the drug was handed at the police station. That made the case one of further inquiry; the petition was converted into an appeal and bail granted. Use it at the bail stage, before any trial evidence.
11	Asif Ali and another v. The State through A.G. Khyber Pakhtunkhwa, 2024 SCMR 1408 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Naeem Akhtar Afghan JJ; 31.5.2024) †	Which steps must the prosecution prove, and what if the carrier is not produced?	Provisions: s. 9, CNSA 1997; Rr. 4 to 6, Government Analysts Rules 2001. It is the prosecution's duty to establish every step: recovery, making of the sample parcels, safe custody of the parcels and their safe transmission to the laboratory. If any link is missing, the benefit goes to the accused. Failure to produce the witness tasked with transmitting the samples to the Chemical Examiner can cast away the entire prosecution case. The Court relied on Javed Iqbal (2023 SCMR 139), Mst. Sakina Ramzan (2021 SCMR 451), Qaiser Khan (2021 SCMR 363), Khair-ul-Bashar (2019 SCMR 930) and Imam Bakhsh (2018 SCMR 2039). Petition converted into an appeal and allowed.

No.	Citation	Question	Answer
12	Haider Mehar v. The State, 2024 SCMR 1471 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Naeem Akhtar Afghan JJ; 24.5.2024) †	Contra authority: when is the chain held complete and the PFSA report accepted?	Provisions: s. 9(1), Sr. Nos. 3(a) and 6(a), CNSA 1997; Art. 185(3) Constitution. Here 2,300 g of charas and 700 g of heroin were recovered. All the prosecution witnesses gave consistent details of the raid, arrest, search, recovery, preparation of samples, their safe transmission to the police station, safe custody and delivery to the Punjab Forensic Science Agency, and remained consistent in cross-examination. Nothing showed false implication. Leave was refused. The lesson for the defence: a chain that is proved witness by witness cannot be broken by a general suggestion.
13	Hasrat Khan v. The State, PLD 2024 SC 911 (Yahya Afridi, Jamal Khan Mandokhail, Malik Shahzad Ahmad Khan JJ; 1.8.2024) †	When one consolidated sample is taken from a very large recovery, how much of the recovery counts for sentence?	Provisions: s. 9(c), CNSA 1997; Art. 185(3) Constitution. The vehicle carried 320 packets of 1 kg each; one consolidated sample of 3.200 kg was taken and tested positive by the Federal Narcotics Testing Laboratory. Safe custody and transmission to the laboratory were proved and the conviction was maintained, but since only 3.200 kg had been tested, only that quantity could be considered for sentence. The sentence was reduced to six years and six months with fine. Check how the sample was drawn: a consolidated sample proves the nature of the whole only if it was taken from every packet.
14	Muhammad Iqbal v. The State through P.G. Sindh, 2025 SCMR 704 (Musarrat Hilali, Salahuddin Panhwar, Ishtiaq Ibrahim JJ; 17.2.2025) †	The prosecution produced five witnesses and the report was positive, yet the chain was "unverified". Does the Court acquit?	Provisions: s. 9(c), CNSA 1997; Rr. 4 to 6, Government Analysts Rules 2001. For 1,400 g of charas the trial court gave ten years. The Supreme Court found that the chain of custody remained unverified, that safe transmission of the contraband was not conclusively established, that there were contradictions about the handling of the case property and that key witnesses responsible for its movement were not produced. Where any link remains doubtful, the benefit accrues to the accused. Convictions set aside.
15	Abdul Haq v. The State, 2025 SCMR 751 (Muhammad Hashim Khan Kakar, Muhammad Shafi Siddiqui, Ishtiaq Ibrahim JJ; 4.3.2025) †	What exactly must the prosecution show before the Chemical Examiner's report is relied on?	Provisions: s. 9(1)(d), Control of Narcotic Substances Act 2019; Rr. 4 to 6, Government Analysts Rules 2001. The accused was sentenced to life for 16,215 g of opium found in a car. The Court held that to justify a conviction the prosecution must establish that the chain of custody was safe, secure and indispensable before the Chemical Examiner's report can be relied on; it had failed to prove safe custody and transmission from the place of seizure to the police station and then to the Chemical Examiner. Appeal allowed. Note the sanctity given to the chain, not merely the sample.
16	Jeehand v. The State, 2025 SCMR 923 (Muhammad Hashim Khan Kakar, Muhammad Shafi Siddiqui, Ishtiaq Ibrahim JJ; 14.3.2025) †	What do the Police Rules require for case property, and what is wrong with one collective report for many samples?	Provisions: s. 9(c), CNSA 1997; R. 22.70 Police Rules 1934 and Register No. XIX. Case property must be kept in the malkhana and entered in Register No. XIX, and its dispatch to a laboratory must be recorded with a road certificate, so that the court can be sure that what is produced is what was seized. The accused was convicted (life) for 100 packets of 100 g each; the Supreme Court held that safe custody and transmission from the spot to the laboratory were not satisfactorily established and noted the problem of a collective forensic report for all samples. Appeal allowed. Ask for the register itself, not the Moharrir's oral account of it.
17	Zakir Ali v. The State, 2025 SCMR 1644 (Muhammad Hashim Khan Kakar, Salahuddin Panhwar, Ishtiaq Ibrahim JJ; 24.4.2025) †	The official who carried the murasila and the case property to the police station was neither cited nor examined. Is that a serious omission?	Provisions: s. 9(c), CNSA 1997; Rr. 4 and 5, Government Analysts Rules 2001; R. 22.70 Police Rules 1934. The Court called it a serious blow to the prosecution because no other evidence proved safe transmission of the case property and samples from the spot to the police station. Further, the seizing officer did not state who took the samples to the laboratory, the Moharrir admitted that the parcels came to him without a receipt and he did not produce Register No. 19, and the IO did not name the carrier though the laboratory report carried his own name. Petition converted into an appeal and allowed.

No.	Citation	Question	Answer
18	Farman Ali and another v. The State, 2025 SCMR 1730 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 26.5.2025) †	1,640 sample parcels of 5 g each were sent to the laboratory through a constable who was never examined. How does the Court deal with it?	Provisions: s. 9(c), CNSA 1997; Rr. 4 and 5, Government Analysts Rules 2001; s. 173 Cr.P.C. The constable through whom the samples were sent was not produced, no reason was given, and his name was not even on the calendar of witnesses in the s. 173 report. The laboratory's report showed only a number (5915) for the person who deposited the parcels. A Head Constable said he took the murasila, the recovery memo, the card of arrest and the parcels to the police station, but the ASI to whom he said he handed them mentioned only the murasila. Appeals allowed. Compare the evidence of each hand-over side by side: each witness must say he received what the previous one said he gave.
19	Muhammad Nasir v. The State, 2026 SCMR 224 (Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim, Ali Baqar Najafi JJ; 15.10.2025) †	The complainant could not say to whom he gave the case property and sample parcels. What does the Court do?	Provisions: s. 9(c), CNSA 1997; Rr. 4 and 5, Government Analysts Rules 2001. Twenty-six packets of charas were said to be recovered from the petitioner's car. The complainant did not name the person to whom he handed the case property and the sample parcels, the recovery witness did not say who received the sample parcels, and the complainant did not even say that the petitioner was driving or collect CCTV footage from a nearby school and college. Safe custody of the recovered narcotic and sample was not established. Appeal allowed.
20	Raham Gul and another v. The State, 2026 SCMR 584 (Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim, Ali Baqar Najafi JJ; 19.8.2025) †	42 kg of charas were recovered from a car; the malkhana register was withheld and the complainant was himself the IO. Can the statutory presumption be invoked?	Provisions: s. 9(c) and s. 29, CNSA 1997. The most important evidentiary chain was broken: no record of when the entry was made in Form-19, proceedings were shifted from the spot to the police station, the relevant malkhana registers were withheld and the complainant acted as the Investigating Officer, compromising neutrality. The s. 29 presumption could not be invoked because the prosecution's own case fell short of the standard of proof. Convictions set aside. Always ask for the Form-19 entry and its date and time.
21	Ameenullah and another v. The State, 2026 SCMR 870 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 18.4.2025) †	314 kg of narcotics were sealed in eight bags. The two officers contradicted each other on who sealed them and who kept them in the malkhana. Is the contradiction material?	Provisions: s. 9(c), CNSA 1997; R. 22.70 Police Rules 1934. Yes. The Inspector said he himself sealed each bag and placed them in the malkhana; another witness said the Inspector did not seal them and the Head Moharrir kept them. No witness was produced to prove safe custody of the eight bags, other witnesses were given up without explanation, and the Inspector said the bags were taken from the malkhana on 13.3.2017 and sent to the laboratory. The Court also directed that copies go to the Chief Secretary, Prosecutor General and the High Court of Sindh on conduct of criminal trials. Appeal allowed.
22	Attique Ullah v. The State, 2026 SCMR 937 (Muhammad Hashim Khan Kakar, Salahuddin Panhwar, Ishtiaq Ibrahim JJ; 23.1.2026) †	Where Ice and charas are both recovered, does contradiction between witnesses plus an unproved chain lead to acquittal?	Provisions: ss. 9(d) and 11(c), Khyber Pakhtunkhwa Control of Narcotic Substances Act 2019 (appeal from Peshawar High Court, Cr. A. 859-P of 2025). One packet of 1,005 g of ICE (amphetamine) and 6,000 g of charas in five packets were recovered from the vehicle. The Supreme Court noted the contradictions in the statements of the witnesses and that safe custody and transmission of the contraband were not established, and applied the settled rule (Qaiser Khan 2021 SCMR 363, Razia Sultana 2019 SCMR 1300, Imam Bakhsh 2018 SCMR 2039, Ikram Ullah 2015 SCMR 1002, Amjad Ali 2012 SCMR 577) that failure to prove safe custody and transmission is fatal. Petition converted into an appeal and allowed.
23	Tariq Sajjad Khan v. The State, 2026 SCMR 1215 (Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim, Ali Baqar Najafi JJ; 23.10.2025) †	The recovery was said to be ten packets of 1,200 g each, but the packets weighed differently, and CCTV was not produced. Does that matter in a narcotics case?	Provisions: s. 9(c), CNSA 1997. Twelve kilograms of charas were said to be packed in ten packets of 1,200 g each, but the weight of each packet (as proved) categorically belied the prosecution version; the Moharrir and the non-production of CCTV footage added to the doubts. The Court held that proof in a narcotics case must be of the highest degree. Petition converted into an appeal and allowed (the sentence of 5 years 6 months had already been undergone). Weigh the packets in court: a difference between the memo and the scale is a ready cross-examination point.

No.	Citation	Question	Answer
24	Abdul Raheem and another v. The State, 2026 SCMR 1516 (Jamal Khan Mandokhail, Shahid Waheed, Muhammad Shafi Siddiqui JJ; 10.2.2026) †	The parcels were de-sealed in court, but nobody recorded whether they carried police seals or laboratory seals. Why does that matter?	Provisions: s. 9(c), CNSA 1997; Rr. 5 and 6, Government Analysts Rules 2001. For 22 kg of charas the parcels were opened in court without a note of whose seals they bore; the complainant said the parcels bore his signatures but did not mention the recovery witness's, while the recovery witness claimed he signed. The laboratory report did not say to whom the remaining material was returned, the Moharrar did not depose about receiving it back, and the IO did not explain who received the parcels and whether laboratory seals were intact. The identity of the parcels produced in court with those sent to the Chemical Examiner was not proved. Petitions converted and appeals allowed.
25	Mehmood Khan and others v. The State, 2026 SCMR 1606 (Muhammad Hashim Khan Kakar, Salahuddin Panhwar, Ishtiaq Ibrahim JJ; 11.5.2026) †	What is the prosecution's obligation about the Moharrar and the register entries?	Provisions: s. 9(c), CNSA 1997. For 26 kg of charas found in the secret cavity of a truck, the prosecution failed to produce the Moharrar/malkhana in-charge in whose custody the property remained during the intervening period and withheld the relevant register entries. Such omissions cannot be brushed aside lightly: the prosecution is under a strict obligation to establish an unbroken chain of custody from recovery until receipt by the Chemical Examiner. The Court also noted that the registered owner of the truck was not associated or produced and that independent witnesses were not joined. Appeal allowed and the petitioners acquitted.
26	Zeeshan Khan v. The State and others, 2026 SCMR 1697 (Malik Shahzad Ahmad Khan, Muhammad Shafi Siddiqui, Shakeel Ahmad JJ; 27.4.2026) †	Contra authority: is non-recording of a video of the recovery a ground for acquittal?	Provisions: s. 9(1), Sr. No. 3(c), CNSA 1997. No, not by itself. Where safe custody and transmission of the parcels from the place of occurrence to the malkhana and then to the Forensic Science Agency were established by confidence-inspiring evidence, the laboratory report confirmed charas (3,600 g) and the recovery witnesses were reliable, the absence of a video of the recovery is not a ground for bail or acquittal because no statute requires it. The appeal was dismissed. Counsel should not rest a defence on the missing video alone.
27	Gul Muhammad and 2 others v. The State, 2026 SCMR 1395 (Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim, Ali Baqar Najafi JJ; 15.9.2025) †	Contra authority: what record satisfied the Court that sealed samples travelled safely to the Forensic Science Agency?	Provisions: s. 9(c), CNSA 1997. Safe custody and safe transmission of the sealed samples from the place of recovery to the police station and then to the Forensic Science Agency were proved through the statements of the Investigating Officer and the Moharrir of the police station, and the positive report of the Agency corroborated the prosecution case. All witnesses were extensively cross-examined without anything material coming out. The convictions of two petitioners were maintained and leave refused; a woman co-accused (Mst. Sumair Bibi) was acquitted. A model of the proof that both defence and prosecution should measure a case against.

Part II: Narcotics, Chemical Examiner / Government Analyst / FSL report and chain of custody.

Peshawar High Court

No.	Citation	Question	Answer
28	Aman-ul-Haq v. State through Advocate General Khyber Pakhtunkhwa and 8 others, 2020 PCr.LJ 1263 Peshawar (Waqar Ahmad Seth CJ, Abdul Shakoor J; 18.6.2019) †	Does the Chemical Examiner's report have to be in the prescribed form, and can the court test it even if the defence does not rebut it?	Provisions: ss. 35 and 36, CNSA 1997; Rr. 3 and 6, Control of Narcotic Substances (Government Analysts) Rules 2001. The report must be in the prescribed form, in quadruplicate, showing (i) all the tests and analysis, (ii) the result of each test with the consolidated result and (iii) the protocols applied. Under s. 36 the report is admissible without formal proof but is rebuttable and may be questioned, and the court is free to examine whether it meets the Act and Rules even if the accused has not rebutted it. Transmission in safe custody and compliance with the Act and Rules are mandatory. Writ petition allowed.

No.	Citation	Question	Answer
29	Khurshed v. The State, 2020 MLD 352 Peshawar (Waqar Ahmad Seth CJ, Ahmad Ali J; 17.9.2019) †	Twenty-four kilograms of charas were recovered from a motorbike in a rented house, and the police could not prove safe custody or transmission of the samples. What was the result?	Provisions: s. 9(c), CNSA 1997. The police said the accused was a proclaimed offender in a murder case, but no such FIR was on the file. Safe custody of the contraband by the police and transmission of the samples to the Chemical Examiner were not established and the benefit of doubt was given; the appeal was allowed and the appellant acquitted. A reminder that the story told to justify the raid must also be supported by documents.
30	Asad v. The State, 2021 YLR 254 Peshawar (Musarrat Hilali, Ahmad Ali JJ; 3.12.2019) †	Twenty-eight kilograms of narcotics were recovered. The scribe of the FIR contradicted the IO on transmission of the murasila, and neither the sample-bearer nor the store room register was produced. Result?	Provisions: s. 9(c), CNSA 1997; Art. 129(g) Qanun-e-Shahadat 1984; R. 22.70 Police Rules 1934. The scribe, who had affirmed receipt of the murasila, negated the IO's stance that it came with the case property; the sample-bearer and the store room register were withheld, there was delay in sending the samples to the laboratory and the vehicle was not produced. Withholding the best evidence led to an adverse inference under Art. 129(g). Appeal allowed and the appellant acquitted.
31	The State through Advocate-General, Khyber Pakhtunkhwa v. Javed Iqbal, 2021 YLR 662 Peshawar (Shakeel Ahmed J; 23.6.2020) †	In an appeal against acquittal, can the State rely on a sample of 4 g taken from five packets (5,200 g) sealed with another officer's monogram?	Provisions: s. 9(c), CNSA 1997; Rr. 4 and 5, Government Analysts Rules 2001; s. 417 Cr.P.C. No. Only 4 g from five packets was taken, so no sample was taken from each slab or cake, creating doubt about what had been tested; the parcels were sealed with the monogram "WK", which was not that of the seizing, recovery or investigating officer, and the prosecution gave no explanation. The head-note also records the issue of delay in sending the samples. The acquittal was maintained. For a defence lawyer: check the monogram on the seal against the names on the memo.
32	Muhammad Saeed v. The State, 2023 MLD 373 Peshawar (Rooh-ul-Amin Khan, Mohammad Ibrahim Khan JJ; 15.3.2022) †	Fifty kg of charas were found in the secret cavities of a car; the samples reached the laboratory on the eighth day. What if the Moharrir admits the delay?	Provisions: s. 9(c), CNSA 1997; R. 4(2), Government Analysts Rules 2001. The seizing officer said the samples were separated on the day of occurrence, the laboratory report showed receipt on the eighth day, and the Moharrir admitted in cross-examination that he sent them after about eight days; no explanation for the delay was offered. Safe custody was in doubt and the appeal was allowed. Put the date of the report to the seizing officer first and the Moharrir second.
33	Haris v. The State, 2023 MLD 924 Peshawar (Rooh-ul-Amin Khan J; 1.4.2022) †	Contra authority: how did the prosecution prove the chain from the spot to the laboratory in a case of charas and Ice?	Provisions: ss. 9(d) and 11(b), Khyber Pakhtunkhwa Control of Narcotic Substances Act 2019. 1,010 g charas and 755 g Ice were recovered. The Moharrir said the constable handed him the murasila, the accused and the case property for safe custody and transmission, made an entry in Register No. 19 and handed the samples to a constable with a rahdari receipt for the laboratory. That unbroken chain through cogent witnesses was accepted; conviction was maintained with the sentence reduced to six months' simple imprisonment on the material circumstances. Compare with Said Wazir to see what was missing there.
34	Ghulam Jan v. The State, 2023 YLR 1786 Peshawar (Sahibzada Asadullah, Muhammad Faheem Wali JJ; 12.1.2023) †	Contra authority: 55,893 g of charas in a truck: what in the Moharrir's evidence completes the chain?	Provisions: s. 9(c), CNSA 1997. Forty-four packets were recovered from the secret cavities of the truck driven by the accused. The Moharrir of the police station said the IO handed him the sample parcels and the parcel of remaining charas with an application for the laboratory, and the transmission of the samples to the Chemical Examiner was proved through the record and the witnesses. The appeal was dismissed. The same Moharrir is the prosecution's best protection and the defence's best cross-examination target.
35	Zafar Ali v. The State, 2023 YLR 1942 Peshawar (Syed Arshad Ali, Kamran Hayat Miankhel JJ; 22.6.2022) †	Ninety kilograms of charas in 80 slabs: the complainant said he sent the case property with the accused under constable's escort. Is the transmission of samples to the Forensic Laboratory proved?	Provisions: s. 9(c), CNSA 1997; R. 22.70 Police Rules 1934. The Court's scrutiny of the prosecution evidence showed that safe custody and transmission of the narcotics to the Forensic Laboratory were not established. Benefit of doubt was given and the appeal allowed. The complaint that case property travelled with the accused and escort rather than through a documented hand-over is a typical gap to be tested by the Moharrir's register.

No.	Citation	Question	Answer
36	Mehboob Ali v. The State, 2023 YLR 2579 Peshawar, Mingora Bench (Muhammad Naeem Anwar J; 27.2.2023) †	What is the test for a break in the chain under the Khyber Pakhtunkhwa Act of 2019?	Provisions: ss. 9(d) and 11(c), KP Control of Narcotic Substances Act 2019. The completeness of the chain is of utmost importance, and any break or lapse in control of possession of the samples is enough to raise doubt; the positive Forensic Science Laboratory report then loses its value and cannot sustain conviction (State v. Imam Bakhsh, 2018 SCMR 2039). Here 750 g and 783 g of Ice and 8,231 g of charas were recovered and no witness explained the custody of the samples. Appeal allowed.
37	Khan Zada and another v. The State, 2024 MLD 1645 Peshawar, Mingora Bench (Dr. Khurshid Iqbal J; 6.3.2023) †	Contra authority: what record from the Levy Post to the laboratory convinced the Court?	Provisions: s. 9(d), KP Control of Narcotic Substances Act 2019. 2,000 g heroin and 2,523 g charas were recovered. The case property was handed to the DFC under a receipt (rahdari), the DFC confirmed receiving it, taking it to the Forensic Science Laboratory, delivering it and bringing back the acknowledgment to the Levy Post, and the laboratory report carried his belt number and the date of receipt (29/07/2022). The appeal was dismissed. Both sides should build the case around such a documentary trail.
38	Kashmaloo v. Qabil Khan, SHO and another, 2024 PCr.LJ 174 Peshawar (Sahibzada Asadullah, Shahid Khan JJ; 4.4.2023) †	Contra authority: is a delay of three days a breach of R. 4 of the Government Analysts Rules?	Provisions: s. 9(d), KP Control of Narcotic Substances Act 2019; R. 4, Government Analysts Rules 2001. Recovery of 24,280 g of charas was on 21.8.2021 and the laboratory received the parcels on 24.8.2021. The Court held that for all intents and purposes the requirement of dispatch within seventy-two hours was satisfied, and the prosecution had proved the recovery, safe custody and safe transmission; the positive report strengthened its case. Appeal dismissed. A one-day overrun is not treated as a break unless the surrounding evidence is also doubtful.
39	Muhammad Imtiaz v. The State through Advocate-General, 2024 YLR 1390 Peshawar (Muhammad Ibrahim Khan, Ishtiaq Ibrahim JJ; 7.3.2023) †	Contra authority: the complainant drafted the application to the laboratory and the recovery witness confirmed the chain. Does the conviction stand?	Provisions: s. 9(d), KP Control of Narcotic Substances Act 2019. Two packets of heroin of 1,000 g each were recovered; the recovery witness (a constable) confirmed the recovery memo and that the complainant drafted the murasila and the application to the Forensic Science Laboratory and handed over the case property; safe custody and transmission were proved. The conviction was maintained with the sentence modified. For the defence the only effective point was the quantum of sentence.
40	Muhammad Raziq and another v. The State, 2025 YLR 26 Peshawar (Kamran Hayat Miankhel J; 4.6.2024) †	3,360 g of charas: the carrier of the sample and the Moharrir of the police station were not examined. What is the consequence?	Provisions: s. 9(c), CNSA 1997; Art. 129(g) Qanun-e-Shahadat 1984; Rr. 4, 5 Government Analysts Rules 2001. These important witnesses were needed to prove that the case property was in safe custody until its transmission to the Forensic Science Laboratory. Their non-production cast serious doubt, and withholding such evidence led to an adverse inference against the prosecution. Appeal allowed and the appellants acquitted. This is the PHC authority to cite together with Zahir Shah (2019 SCMR 2004).
41	The State v. Safiullah Khan alias Gura, 2025 YLR 506 Peshawar (Kamran Hayat Miankhel, Dr. Khurshid Iqbal JJ; 11.6.2024) †	In an appeal against acquittal, how did the Court deal with a 14-day delay and the constable's excuse of laboratory rush?	Provisions: s. 9(d), KP Control of Narcotic Substances Act 2019; Rr. 4(2), 5 and 6, Government Analysts Rules 2001; s. 417 Cr.P.C. The sample of 1,020 g charas was sent after 14 days, in breach of R. 4(2), with no plausible explanation; the constable who took the sample on 15.1.2020 deposited it on 16.1.2020 and said the laboratory was crowded, an excuse the Court called vague and one that dented safe custody. The prosecution failed to establish the chain and the appeal against acquittal was dismissed in limine.
42	Asad Khan v. The State, 2026 PCr.LJ 781 Peshawar (Kamran Hayat Miankhel, Dr. Khurshid Iqbal JJ; 16.4.2024) †	Contra authority: what evidence of the road certificate and receipt supports the chain?	Provisions: s. 9(d), KP Control of Narcotic Substances Act 2019. Of the 94,800 g of charas recovered from the vehicle the Moharrir handed the constable the case property, the application to the laboratory and the road certificate; on return the constable was handed the receipt and the road certificate stamped by the laboratory. Both were extensively cross-examined without damage. The appeal against conviction was dismissed. A stamped road certificate and receipt are the standard proof of arrival.

No.	Citation	Question	Answer
43	Hamid Ullah v. The State, 2026 YLR 229 Peshawar (Muhammad Tariq Afridi J; 24.3.2025) †	Ice (510 g) was recovered with a Kalashnikov. The sample was sent after ten days and Register XIX does not name the carrier. Is bail arguable?	Provisions: s. 497 Cr.P.C.; KP Control of Narcotic Substances Act 2019; R. 4(2), Government Analysts Rules 2001; s. 15, KP Arms Act 2013. Recovery was on 13.10.2024 and the sample went to the laboratory on 23.10.2024, beyond seventy-two hours, and Register XIX did not show who took it. The prosecution was yet to establish safe custody and secure transmission, which made the case arguable for bail, and the s. 15 Arms Act offence did not attract the bar of s. 497 Cr.P.C. Bail granted.
44	Mst. Atiya Bibi v. The State, 2026 MLD 518 Peshawar (Sadiq Ali J; 8.5.2025) †	A woman was arrested with alleged Ice and charas, the proceedings were not recorded on a mobile phone, and the FSL report is awaited. Is she entitled to bail?	Provisions: s. 497(1) Cr.P.C. (proviso for women); s. 11(b), KP Control of Narcotic Substances Act 2019; s. 15-AA, KP Arms Act 2013. The report of the Forensic Science Laboratory was awaited, so it was yet to be decided whether the substance was truly Ice; the proceedings were not recorded by the police on a mobile phone or any other audio or video device; and the accused was a woman. Bail was granted. Remember that a pending laboratory report is itself a ground for bail in a doubtful Ice case.
45	Sardar Khan v. The State, PLD 2005 Peshawar 166 (Ijaz-ul-Hassan Khan, Shahzad Akbar Khan JJ; 19.4.2005) †	Must the entire quantity recovered be sent to the Chemical Examiner?	Provisions: s. 9(c), CNSA 1997. No. A meagre quantity separated out of the lot is enough and the admissibility of the report cannot be challenged on that ground alone; the Court also held that police officials are competent recovery witnesses and that no law bars a police officer from being complainant, witness and Investigating Officer in the same case. The conviction was upheld. Sardar Khan is the early Peshawar authority on sampling; later cases add that the sample must be representative (Imam Bakhsh).
46	Muhammad Ikram v. The State, 2023 PCr.LJ 635 Peshawar (Rooh-ul-Amin Khan J; 24.1.2022)	During cross-examination the accused's counsel de-sealed the case property and claimed that five packets looked like opium. Can he demand fresh samples for the Forensic Science Laboratory at that stage?	Provisions: s. 561-A Cr.P.C.; s. 9(d), KP Control of Narcotic Substances Act 2019. The trial court refused the defence application and allowed the prosecution's applications for further witnesses. Quashment was refused because the samples sent by the prosecution had already been analysed and the report (Exh. PZ) was on the file, and counsel's observation that packets "resembled" opium was not a ground to order fresh testing at that stage. Raise doubts about the sampling during cross-examination and at the s. 342 stage rather than hoping for a second test.

Part III: Firearm expert, crime empties, serology and blood reports. Supreme Court of Pakistan

No.	Citation	Question	Answer
47	Nawab Siraj Ali and others v. The State, 2023 SCMR 16 (Ijaz ul Ahsan, Munib Akhtar, Sayyed Mazahar Ali Akbar Naqvi JJ; 18.10.2022) †	What is the effect on the Forensic Science Laboratory's positive report of sending the crime empties after the arrest of the accused or together with the weapon?	Provisions: s. 13(e), Pakistan Arms Ordinance 1965; s. 302(b) PPC. If the crime empty is sent to the Laboratory after the arrest of the accused or together with the crime weapon, the positive report loses its evidentiary value. Here the empties were first sent on 31.12.2012, taken back on 17.1.2013 and re-submitted on 23.1.2013 along with the pistol recovered from the appellant. Sending them together is not a safe way to sustain a conviction and it smacks of foul play on the part of the Investigating Officer, who kept the empties with him for no justifiable reason. Appeal allowed and the appellant acquitted. This is the foundational statement of the rule.
48	Sarfraz and another v. The State, 2023 SCMR 670 (Ijaz Ul Ahsan, Sayyed Mazahar Ali Akbar Naqvi, Athar Minallah JJ; 2.1.2023) †	Is the rule about empties sent with the weapon confined to Arms Ordinance cases?	Provisions: s. 302(b) PPC. No. The Court applied the same rule in a murder case: where the crime empty is sent to the Laboratory after the arrest of the accused or together with the crime weapon, the positive report loses its evidentiary value, and sending them together smacks of foul play because the IO keeps the empties with him until the weapon is recovered. The Court also said that the heinousness of the offence, if not proved to the hilt, is no ground to punish and that the benefit of doubt does not need many circumstances: one reasonable doubt suffices. Appeal allowed. Cited in all later cases on this subject.

No.	Citation	Question	Answer
49	Ibrar v. The State, 2026 SCMR 476 (Irfan Saadat Khan, Naeem Akhter Afghan, Malik Shahzad Ahmad Khan JJ; 26.11.2025) †	The empties matched the pistol, but they were sent to the expert after the arrest and after 37 days. What is left of the corroboration?	Provisions: s. 302(b) PPC; Art. 185(3) Constitution. Four crime empties recovered on 18.1.2020 were sent to the Firearm Expert on 25.2.2020, after the arrest of the petitioner and after an unexplained delay of 37 days. The Court followed Nawab Siraj Ali (2023 SCMR 16) and Sarfraz (2023 SCMR 670): the recovery of the pistol and the positive report of the Firearm Expert were inconsequential and of no avail to the prosecution. The recovery from a graveyard was also not attested by any independent witness. The death sentence was converted into imprisonment for life as a mitigating circumstance.
50	Iftikhar Ahmed alias Papu and another v. The State, 2026 SCMR 1010 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 16.9.2025) †	The 12-bore gun was recovered and the Forensic Science Agency report was positive, but the empties reached the Agency on the date of the arrest. Does the report corroborate?	Provisions: ss. 302(b), 324, 337-F(iii), 109, 148 and 149 PPC. The High Court had upheld the conviction on the ground that the case was corroborated by the recovery of the 12-bore gun and the positive Agency report. The Supreme Court noted that the empties were recovered from the spot on 23.8.2012, the appellant was arrested on 28.8.2012 and the empties were deposited with the Agency on 28.8.2012, i.e. after the arrest, so the recovery and the positive report were not safe to rely on (Muhammad Amin, 2019 SCMR 2057; Asad Rehmat, 2019 SCMR 1156). The appeal against conviction was allowed. Compare the dates on the recovery memo of the empties, the arrest memo and the laboratory receipt side by side.
51	Ghulam Mustafa alias Raja Buledi v. The State, 2025 SCMR 1633 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 12.5.2025) †	Empties and pistol were deposited together at the laboratory on 1.2.2019. Can the conviction rest on the match?	Provisions: s. 302(b) PPC. The empties and the pistol were deposited together in the office of the Forensic Science Laboratory on 1.2.2019, and the Court held that it was not safe to rely on the prosecution evidence about the recovery of the pistol and the positive laboratory report (Sarfraz, 2023 SCMR 670; Abdul Wahid, 2023 SCMR 1278). A single circumstance creating doubt suffices for acquittal. Appeal allowed.
52	Muhammad Imtiaz Baig and another v. The State, 2024 SCMR 1191 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Musarrat Hilali JJ; 29.3.2024) †	The pistol was recovered on the pointation of a co-accused during physical remand and the empties went to the PFSL two months after the recovery from the spot. What does the Court say?	Provisions: s. 302(b) PPC; Art. 185(3) Constitution. The empties were taken into custody on 28.5.2012 and reached the PFSL on 31.7.2012 for comparison after the pistol was recovered. The Court held that such delayed submission of crime empties, especially after recovery of the weapon, was not warranted under the law; the evidence on motive was rightly disbelieved and the case against the petitioner was doubtful. Petition converted into an appeal and allowed for that petitioner (the other petitioner's conviction was upheld). Note the unequal outcome among co-accused: the benefit depended on what each had to answer.
53	Javed Khan alias Bacha and another v. The State, 2017 SCMR 524 (Dost Muhammad Khan, Qazi Faez Isa, Faisal Arab JJ; 20.1.2017) †	The pistol used in the crime was recovered in another case and reached the laboratory after the date of the accused's disclosure. What follows?	Provisions: s. 302 PPC. The pistol was sent to the Forensic Science Laboratory on 7.1.2002, whereas the IO said the accused disclosed using the same weapon in the present crime on 14.10.2001. The Court found doubts about when and how the bullet casing and the weapon were delivered to the laboratory and acquitted the appellants. Where the weapon is connected to two cases, compare the dates of recovery, of the disclosure in the second case and of the laboratory dispatch for each.
54	Said-ur-Rehman and another v. The State, 2026 SCMR 955 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 22.5.2025) †	An axe and a knife said to be blood-stained were sent for analysis almost a month after the recovery. Is the positive report reliable?	Provisions: s. 302 PPC; Art. 185(3) Constitution. The Court said the month's delay cast serious doubt on the reliability and evidentiary value of the positive laboratory report; the firearm and the spent bullets were also sent late. Appeal allowed. A positive serology report on a weapon that sat uncatalogued for a month is of little use to the prosecution.

No.	Citation	Question	Answer
55	Fateh Khan and others v. The State, 2025 SCMR 1408 (Naeem Akhter Afghan, Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim JJ; 4.6.2025) †	Crime empties were found on the police's second visit to the spot. Does the match with the Kalashnikov help the prosecution?	Provisions: s. 302(b) PPC (with ss. 148 and 149); Art. 185 Constitution. The empties were not recovered when the police first reached the scene but on a second visit, with no explanation. The Kalashnikov was recovered on pointation on 9.2.2009 and six empties matched it, but no independent witness attested the recovery. For an 8 mm rifle there was no expert report of firing at all, so the recovery was of no avail, and the recovery of a .44 bore rifle had been disbelieved. Appeals allowed. Empties found later and recoveries without independent witnesses are weak corroboration even with a positive report.
56	Khair Muhammad and another v. The State, 2025 SCMR 1599 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 30.4.2025) †	Empties were recovered on 8.12.2015, the pistol on 21.12.2015, and both reached the laboratory on 12.2.2016. Is the match admissible against the accused?	Provisions: s. 302(b) PPC. Both articles were sent together on the same day, producing a positive result that the empties were fired from the pistol. The Court found proven inordinate delay and the police's failure to send the empties before the weapon was recovered; no reliance could be placed on the report where the empties were sent after the weapon's recovery. Appeals allowed. Calculate the number of days between each date and put the table to the IO.
57	Rafaqat Ali alias Foji and another v. The State, 2024 SCMR 1579 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Naeem Akhtar Afghan JJ; 27.5.2024) †	No empties or pellets were found at the scene but the firearm expert said the shotgun was in working condition. Is that corroboration?	Provisions: s. 302(b) PPC. No crime empty or pellet was recovered from the place of occurrence, and a witness gave a contradictory explanation (that the convict took the cartridge away in his gun). The report of the firearm expert that the 12-bore rifle recovered on the convict's disclosure was in working condition had already been held inconsequential and could not be incriminating or corroborative. The jail petition of one convict was converted into an appeal and allowed; the other petition was dismissed. A working-condition report only proves the gun can fire, never that it did.
58	Hazaray Khan and others v. The State, 2024 SCMR 2042 (Jamal Khan Mandokhail, Syed Hasan Azhar Rizvi, Naeem Akhtar Afghan JJ; 24.5.2024) †	Thirty-nine Kalashnikov empties and three 12-bore empties were recovered with the firearms but never sent to the expert. What inference arises?	Provisions: s. 302(b) PPC; Art. 129(g) Qanun-e-Shahadat 1984. The prosecution offered no explanation for not sending the empties and firearms for analysis, and the Court drew an adverse presumption with the other defects: the complainant received no injury despite indiscriminate firing, the witnesses made dishonest improvements, and injured witnesses were not produced. The convicts' appeal was accepted and they were acquitted; the appeals against acquittal and for enhancement were dismissed. In every file check whether recovered empties were ever sent for comparison.
59	Seeta Ram v. The State, 2025 SCMR 2028 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 21.5.2025) †	Is delay in sending crime empties to the Laboratory relevant when the FIR is also late and the recovery is from a public place?	Provisions: s. 302 PPC; s. 154 Cr.P.C. Yes: the Court combined the unexplained delay in registration of the FIR, the absence of motive, the delay in dispatching the crime empties and the recovery from a public place, and gave benefit of doubt in a case where the death sentence had been given. Appeal allowed. Delay in dispatch is not only a laboratory point; it is one of several circumstances that together create doubt.
60	Muhammad Asif v. The State, 2017 SCMR 486 (Dost Muhammad Khan, Qazi Faez Isa, Faisal Arab JJ; 18.1.2017) †	What practice must the police follow when sending blood-stained weapons to the Chemical Examiner and Serologist?	Provisions: s. 302(b) PPC. Mere sending of blood-stained crime weapons to the Chemical Examiner and Serologist does not serve the prosecution or interlink articles. Unless the blood-stained earth or cotton and the victim's blood-stained clothes are sent along with the weapon, it cannot be conclusively opined that the blood on the weapon is human and of the same group as the blood on the victim's clothes and the earth. Failure to follow this practice makes the Chemical Examiner's opinion inconclusive, and it cannot be used as corroboration. Appeal allowed and the appellant acquitted.

No.	Citation	Question	Answer
61	Hayatullah Khan and another v. Muhammad Khan and others, 2011 SCMR 1354 (Javed Iqbal, Muhammad Sair Ali, Anwar Zaheer Jamali JJ; 10.8.2010) †	Can the Investigating Officer decide whether the firearm expert's report supports the prosecution?	Provisions: ss. 169, 170 and 173 Cr.P.C. No. The IO cannot be considered such a skilled person as to give an opinion on medical evidence; whether medical evidence corroborates the ocular version and what the evidentiary value of an expert's report is are questions for the trial court. The petition against the discharge of accused was dismissed and leave refused. Use this when the police report under s. 173 says that the expert's report "supports" the accused's innocence or guilt.
62	Riasat Ali and another v. The State, 2024 SCMR 1224 (Syed Hasan Azhar Rizvi, Musarrat Hilali, Naeem Akhtar Afghan JJ; 16.4.2024) †	Seven empties were said to be found at point "I" of the site map, but the map had no such point and no empty at the accused's firing position. What is the effect?	Provisions: s. 302(b) PPC; Art. 185(3) Constitution. The Court observed that the site map mentioned seven empties from point I, but there was no point I in the site map, and no empty was recovered near point E from where the petitioner was said to have fired. These infirmities, with the medical evidence and the unnatural conduct of the witnesses, made the case doubtful. Petition converted into appeal and allowed; the petitioner was acquitted. The empties must be shown on the site plan at the same point as in the recovery memo.
63	Riaz (deceased) through brother Abdur Rauf and another v. The State, 2026 SCMR 980 (Jamal Khan Mandokhail, Musarrat Hilali, Shakeel Ahmad JJ; 13.8.2025) †	Contra authority: is non-recovery of some of the empties from the scene fatal?	Provisions: s. 302(b) PPC; Art. 185(3) Constitution. No. Recovery of blood-stained earth and one .30 bore empty confirmed the scene (a railway track). The remaining empties were not recovered, but the crime occurred near a mosque on the railway track, and the Court thought it strongly possible that people of the vicinity were attracted to the scene and the rest of the empties were misplaced in the rush. Petitions dismissed and leave declined. Counsel for the defence must show that the missing empties were not explainable in this way.
64	Yar Muhammad Khan v. The State and another, 2024 SCMR 1738 (Naeem Akhtar Afghan, Shahid Bilal Hassan JJ; 25.7.2024) †	In a bail matter, how much does a positive FSL report on empties and the weapon matter?	Provisions: s. 497 Cr.P.C.; ss. 302, 324, 337-F(v), 337-A(i) PPC; Art. 185(3) Constitution. Seven 7.62 and three .30 bore empties were recovered from the scene and, on the accused's pointing out, a Kalashnikov was recovered; the Forensic Science Laboratory's report was positive. This was a double murder with a plea of cross-version, but the Court held that the material reasonably connected the petitioner with the crime. Bail refusal was upheld and the petition dismissed. A positive FSL report on empties and a recovered weapon is a serious obstacle at the bail stage.

Part IV: Firearm expert, crime empties, serology and blood reports. Peshawar High Court

No.	Citation	Question	Answer
65	Zarif Khan v. The State, PLD 1994 Peshawar 176 (Muhammad Bashir Khan Jehangiri, Qazi Muhammad Farooq JJ; 23.1.1994) †	Before 2000, how did the Peshawar High Court treat the Ballistic Expert's report and medical opinion?	Provisions: ss. 302 and 337-F(v) PPC. In a single-accused case the complainant gave a simple and straightforward account, which was fully corroborated by the positive report of the Ballistic Expert, so substitution of an innocent for the real murderer was highly improbable and the conviction stood. The Court also said that medical opinion is not conclusive and inviolable and must be tested on the touchstone of well-known principles of medical jurisprudence and firearms. The death sentence was reduced to life imprisonment because a provocation by the complainant could not be ruled out. Early authority that the expert's report corroborates, and that opinion evidence is always tested.
66	Muhammadullah v. The State, PLD 2001 Peshawar 132 (Sardar Muhammad Raza Khan CJ, Ejaz Afzal Khan J; 24.4.2001) †	The shotgun was recovered from the accused and the empties from the spot, with a positive Ballistic report. Does that prove that the accused fired?	Provisions: s. 302 PPC (jail criminal appeal). The recovery of the shotgun from the accused and of empties from the spot, with a positive Ballistic report, might at best prove that the shotgun was used in the offence, but not that the accused used it. The Ballistic report had no value in any event because the gun and the empties were despatched to the expert after a delay of one month. Necessary witnesses were not examined and the motive appeared fictional. The accused was acquitted on the benefit of doubt (appeal accepted).

No.	Citation	Question	Answer
67	Muhammad Ramzan Sharif v. Hussain Gul and another, 2018 MLD 1860 Peshawar (Qalandar Ali Khan, Ishtiaq Ibrahim JJ; 29.3.2018) †	Contra authority: what combination of FSL and firearm evidence did the Court treat as overwhelming?	Provisions: ss. 302(b) and 302(c) PPC. The accused himself reported that he fired once at a man found with his wife; the pistol recovered smelt of fresh discharge, the .30 bore empty from the spot matched the firearm expert's result, the Forensic Science Laboratory confirmed blood-stained earth and garments, and the post-mortem showed a single entry wound. This with his confessional statement left no doubt about the mode and manner. The conviction was altered from s. 302(b) to s. 302(c) with ten years' R.I., and the State's revision for enhancement was dismissed. The unbroken technical chain was the strength of the prosecution.
68	Tasir Ullah v. The State, 2018 YLR Note 182 Peshawar (Lal Jan Khattak, Qalandar Ali Khan JJ; 24.10.2017) †	Blood-stained earth reached the Laboratory about thirteen days after the occurrence and the empties after about 26 days. What is the value of the two reports?	Provisions: ss. 302 and 324 PPC. The blood-stained earth and garments were received in the Forensic Science Laboratory after about thirteen days, and the four empty shells collected on 29.8.2012 reached the Firearms Expert on 24.9.2012 after considerable delay. The High Court held that both reports were of no evidentiary value for the prosecution. Appeal accepted and the appellant acquitted. Delay is measured from the spot inspection to the stamped receipt.
69	Muhammad Nawaz v. Jamroz Khan and another, 2020 YLR 669 Peshawar (Rooh-ul-Amin Khan, Ishtiaq Ibrahim JJ; 16.10.2019) †	The pistol and the empties reached the Laboratory eleven days after the occurrence. Is the recovery reliable?	Provisions: s. 302 PPC. The IO said he arrested the accused with the pistol but did not note its number in the daily diary; the arrest was shown during a raid on the same day, with the weapon in his possession, which the Court found unnatural for a person who had just committed two murders. The pistol and the empties went to the Laboratory eleven days later and the prosecution gave no explanation of where they were in the meantime. Benefit of doubt was given and the appellant's conviction was set aside. Look at the daily diary and the malkhana entry for the pistol.
70	Fazal Dayan v. The State, 2021 YLR Note 106 Peshawar (Rooh-ul-Amin Khan, Syed Muhammad Attique Shah JJ; 23.2.2021) †	The empties were not sent to the Laboratory on the day, and the pistol of the arrested accused reached the IO with a delay of eight days. What is the weight of the positive report?	Provisions: ss. 302, 109 and 34 PPC. The .30 bore empties were not sent to the Laboratory on the same day to see whether they were fired from one weapon or more; the accused was arrested with a pistol and the FIR registered the same day, but the pistol was taken by the IO with a delay of eight days and then sent to the Laboratory with the empties. The positive report was therefore not reliable. Appeal allowed, the murder reference answered in the negative and the appellant acquitted.
71	Noor Zaman v. The State and another, 2021 YLR 1711 Peshawar, Bannu Bench (Ms. Musarrat Hilali, Sahibzada Asadullah JJ; 13.10.2020) †	Blood-stained earth reached the Laboratory five days after the occurrence, the empties 18 days after. What must the IO prove?	Provisions: s. 302(b) PPC. The blood-stained earth and garments were received on 24.7.2014 and the empties on 6.8.2014, though both were recovered on 19.7.2014. The IO could not say where or in whose custody the empties were lying, and he was duty bound to record the statement of the Moharrir of the police station and place the relevant register on the record. Benefit of doubt was given and the appellant acquitted.
72	Anwar Kamal v. The State, 2020 PCr.LJ Note 116 Peshawar (Ikramullah Khan, Sahibzada Asadullah JJ; 19.11.2019) †	The empty was sent to the Laboratory for opinion but no report is on the record, and the same gun was "recovered" twice. What follows?	Provisions: ss. 302(b) and 324 PPC. A .12 bore empty was recovered with blood-stained earth and sent to the Forensic Science Laboratory, but no report was filed; a .12 bore gun was recovered from the accused's house on 10.4.2017 and again on his pointation from the same house on 13.4.2017. With a delay of about fifty minutes in lodging the report and other doubts, the benefit of doubt was given, the appeal allowed and the connected revision dismissed. The absence of a report that is mentioned in the file is itself an admission.
73	Ashraf Ali v. Ayaz Ali and another, 2016 PCr.LJ Note 63 Peshawar (Assadullah Khan Chamkani J; 15.9.2014) †	What if the Laboratory's report on the empty and the pistol is negative?	Provisions: ss. 324 and 337-A(iii) PPC; Art. 129(g) Qanun-e-Shahadat 1984. A negative Forensic Science Laboratory report concerning the crime empty and the .30 bore pistol negated the prosecution version. The case also lacked a source of light at midnight, the witnesses did not explain how they identified the accused, and the withholding of best evidence led to an adverse inference. The conviction was set aside and the accused acquitted. A negative report is conclusive evidence for the defence on the point; the prosecution cannot ignore it.

No.	Citation	Question	Answer
74	The State through A.G. KPK v. Subhan Ali and another, 2020 MLD 1901 Peshawar (Musarrat Hilali, Sahibzada Asadullah JJ; 27.4.2020) †	Three empties from the same weapon but two accused charged with firing: how did the Court use the report?	Provisions: s. 302 PPC with s. 34; s. 417 Cr.P.C. The IO recovered three 7.62 bore empties and the Chemical Examiner's report showed they were fired from one and the same weapon; the deceased had three entry wounds. This belied the complainant's story that two accused fired, and the High Court dismissed the State's appeal against acquittal. A match between the empties and the wounds can undo the number of assailants alleged.
75	Mukhtaj and 4 others v. Ebn-e-Amin and another, 2022 MLD 384 Peshawar (Lal Jan Khattak, Musarrat Hilali JJ; 15.10.2021) †	Twelve empties of two bores were collected but there was no report on whether they were fired from more than one weapon. What is the effect?	Provisions: ss. 302(b), 148 and 149 PPC. There was no Forensic Science Laboratory report that the 3 empties of .222 bore and 9 of 7.62 bore from the spot were fired from more than one weapon of each bore, so the prosecution could not rely on a common-intention or multiple-assailants case; the site plan also did not corroborate the FIR. The appeal against conviction was allowed and the connected revision dismissed. If the prosecution alleges several shooters it must prove it by the expert.
76	Arshad Ali v. The State and others, 2024 MLD 212 Peshawar, Dera Ismail Khan Bench (Ishtiaq Ibrahim, Muhammad Faheem Wali JJ; 17.5.2022) †	The IO did not remember who took the empties and pistol to the Laboratory, and the pistol was recovered on 31.8.2017 but received on 14.9.2017. Can a capital conviction stand?	Provisions: s. 302(b) PPC. No: the IO annexed no document of safe custody of the articles and no daily diary of his departure and arrival, and no police official who took the crime articles to the Laboratory gave evidence. The Court held that the recovery could not sustain a conviction on a capital charge. Appeal allowed, enhancement revision dismissed as infructuous. The two-week gap and the unknown carrier together were decisive.
77	Abdur Rehman Zahid v. The State and another, 2026 PCr.LJ 1742 Peshawar, Abbottabad Bench (Muhammad Faheem Wali J; 27.1.2025) †	In an appeal against acquittal, a gun was recovered on pointation and the report was positive, yet the empty was dispatched late. Does the report help the appellant?	Provisions: s. 324 PPC; s. 15, KP Arms Act 2013; s. 417(2-A) Cr.P.C. The 12-bore gun was recovered on the accused's pointation and the Forensic Science Laboratory's report was positive, but the empty was dispatched late and the recovery was delayed. Together with contradictions and improvements by the complainant, the Court held that the presence of the eye-witness was doubtful and dismissed the appeal against acquittal. Delay in recovery and in dispatch lowers the evidentiary value of a match.
78	Khalid v. The State and another, 2018 MLD 398 Peshawar (Ishtiaq Ibrahim J; 11.8.2017) †	Contra authority: what is the weight of Ballistic and medical opinion when direct evidence is credible?	Provisions: s. 497 Cr.P.C.; ss. 302, 324 and 34 PPC. At the bail stage the accused was directly nominated with a motive, and the medico-legal reports, site plan and recoveries of empty shells and blood-stained earth supported the charge. The Court held that where direct evidence is definite and creditworthy, little weight attaches to the opinion of Ballistic or medical experts, which is corroborative in nature; confirmatory evidence cannot outweigh direct evidence unless it contradicts it. Bail refused. The reverse also holds: where direct evidence is shaky, the expert's report cannot repair it.
79	Atif Khan v. The State, 2006 MLD 532 Peshawar (Dost Muhammad Khan, Jehanzaib Rahim JJ; 14.12.2005) †	Contra authority: how did the Court treat the serologist's and firearms expert's reports where there was no delay?	Provisions: s. 302 PPC. The serologist/FSL report showed that blood from the spot and the deceased's garments was human blood of the same group; the firearms expert's report showed that 7.62 empties from the spot and from the chamber of the Kalashnikov were fired from the crime rifle taken from the accused at arrest. There was no delay in sending the empties and the rifle to the Laboratory, and the post-mortem supported the ocular version. Non-production of some eye-witnesses was held not fatal. Appeal dismissed. A model of the timely chain the defence must attack on other grounds.
80	Sher Umar Khan v. Khan Pur alias Khaney and 2 others, PLD 2015 Peshawar 143 (Rooh-ul-Amin Khan, Syed Afsar Shah JJ; 30.1.2014) †	No empty was found at the scene, yet a shotgun and a rifle were recovered from the accused. Does a report on their working condition help?	Provisions: s. 302 PPC; s. 417 Cr.P.C.; Art. 46 Qanun-e-Shahadat 1984 (dying declaration). The Court held that where no crime empty was recovered despite alleged indiscriminate firing, the recovery of the 12-bore double-barrel shotgun and 7 mm rifle and the Forensic Science Laboratory's report on their working condition were no help to the prosecution; no independent witness was associated with the recovery. The acquittal was upheld and the complainant's appeal dismissed.

No.	Citation	Question	Answer
81	Shoukat Ali v. The State through Additional Advocate General and another, 2020 YLR 1536 Peshawar (Wiqar Ahmad J; 13.11.2019) †	Contra authority: in an attempt-to-murder case, what makes the investigation evidence safe?	Provisions: ss. 324, 337-D, 337-F(i) and 337-F(iii) PPC. The ocular account was supported by the medical evidence and the report lodged in the hospital was proved; the IO was firm in cross-examination on the recovery of the weapon of offence and on sending it to the Forensic Science Laboratory to match with the empties. The conviction was maintained and the appeal dismissed. A firm IO and a documented dispatch make the match credible.
82	Hazrat Noor and another v. The State and 2 others, 2025 YLR 1371 Peshawar (Kamran Hayat Miankhel, Dr. Khurshid Iqbal JJ; 11.6.2024) †	Contra authority: how can the empties help the prosecution when many accused fired?	Provisions: ss. 302(b), 324, 148 and 149 PPC. Seven .30 bore and eight 7.62 bore empties were recovered at the scene of a five-person killing and the Forensic Science Laboratory's report confirmed that they were fired from different weapons, which excluded a single assailant and showed the involvement of more than one. Blood-stained earth and garments with positive reports strengthened the case. The appeals were dismissed. The match shows that the empties can corroborate a multi-accused case when the dispatch was prompt.
83	Kaleem Ullah v. The State and others, 2026 MLD 637 Peshawar, Dera Ismail Khan Bench (Farah Jamshed, Inam Ullah Khan JJ; 25.11.2025) †	A positive FSL report matched two .30 bore empties but no crime weapon was recovered from the appellant. Is it enough?	Provisions: s. 302(b) PPC. The Court held that no weight could be given to the positive report on the two empties because no independent witness was associated with the recovery proceedings and no crime weapon was recovered from the appellant or at his pointation. Recoveries are corroborative, and when direct evidence fails they lose their efficacy. The appellant was acquitted and the connected revision dismissed.
84	Imtiaz Khan v. The State, 2020 PCr.LJ Note 175 Peshawar, Bannu Bench (Muhammad Nasir Mahfooz, Sahibzada Asadullah JJ; 22.10.2019) †	The pistol was sealed on the spot at the arrest, yet the record is silent about when it was given to the IO. Is the match safe?	Provisions: s. 302 PPC with ss. 109 and 34. The SHO (also the scribe of the report) said the pistol recovered from the accused in hot pursuit was sealed on the spot and handed over to the IO, but the record was silent as to when and at what time it reached the IO. The recovery of the pistol and the six empties that matched it therefore did not carry the case; benefit of doubt was given and the appeal allowed.

Part V: Audio and video, CCTV, voice, DNA, mobile phone, fingerprint, handwriting and s. 510 Cr.P.C.

No.	Citation	Question	Answer
85	Ishtiaq Ahmed Mirza and 2 others v. Federation of Pakistan and others, PLD 2019 SC 675 (Asif Saeed Khan Khosa CJ, Sh. Azmat Saeed, Umar Ata Bandial JJ; 23.8.2019)	What conditions must an audio tape or video satisfy before a court can rely on it?	Provisions: Art. 164, Qanun-e-Shahadat Order 1984; s. 9(3), Punjab Forensic Science Agency Act 2007. The Court held that no audio tape or video can be relied on until proved genuine and untampered, because science makes editing, superimposing and doctoring easy and any realistic doubt may destroy its credibility. A forensic report of the Provincial Forensic Science Agency is per se admissible under s. 9(3); the court has discretion under Art. 164 to allow such evidence; the person who recorded it must be produced, must produce the tape himself and identify the voices or persons; it must be played in court, be clearly audible or viewable, be relevant, have its safe custody proved from preparation until production, have its transcript prepared under independent supervision, have its source and date of acquisition disclosed, and be sought by a formal application, and a recording produced late may be looked at with suspicion. Petitions disposed of. The requirements are the checklist for every audio or video exhibit.
86	Member (Administration), Federal Board of Revenue and others v. Mian Khan, 2021 SCMR 1077 (Gulzar Ahmed CJ, Ijaz ul Ahsan, Sayyed Mazahar Ali Akbar Naqvi JJ; 20.4.2021) †	Can CCTV footage alone, never sent to a forensic laboratory, justify a major penalty?	Provisions: R. 4(1)(b)(ii), Government Servants (Efficiency and Discipline) Rules 1973; Art. 185(3) Constitution. No: the department dispensed with a regular inquiry on the ground that the CCTV footage was so authentic, but the footage was never sent to the Forensic Science Laboratory for authenticity, it was not even produced before the Service Tribunal, and the alleged givers of the bribe were not associated. In the absence of a forensic report the footage could not be a legal basis for proceeding against a person; mere production of CCTV footage as evidence without any forensic test is not sufficient unless corroborated and proved genuine. Leave refused. A civil case, but the principle is used in criminal trials.

No.	Citation	Question	Answer
87	Zahir Zakir Jaffar and 3 others v. The State, PLD 2026 SC 251 (Muhammad Hashim Khan Kakar, Ishtiaq Ibrahim, Ali Baqar Najafi JJ; 20.5.2025) †	Contra authority: what forensic proof persuaded the Court to uphold a conviction resting on CCTV and DNA?	Provisions: s. 302(b) PPC; Art. 164 Qanun-e-Shahadat 1984; Art. 185(3) Constitution. The prosecution produced the recorded CCTV footage, hard disk and DVR showing the accused physically assaulting the deceased lady; the recording was submitted to the police for forensic analysis, and the report confirmed it was not edited and that the facial comparison was positive. The recording was automatically generated without human intervention, a DNA report established sexual assault and the crime instrument was stained with the deceased's blood. The accused gave no explanation for her presence in his residence. The Court declined to interfere with the concurrent findings; the petitions for enhancement and against acquittal were dismissed. Compare the elements with Ishtiaq Ahmed Mirza.
88	Kamran v. The State through A.G. Khyber Pakhtunkhwa, 2024 SCMR 1419 (Syed Hasan Azhar Rizvi, Musarrat Hilali, Naeem Akhtar Afghan JJ; 19.4.2024) †	At the bail stage, how much weight does a forensic video analysis of CCTV carry?	Provisions: s. 497 Cr.P.C.; s. 302(b) PPC; s. 164 Cr.P.C. (statements of the father and a witness who had seen the CCTV video); Art. 185(3) Constitution. The father of the deceased and a witness who saw the CCTV video of the stabbing named the petitioner. The forensic video analysis by the Punjab Forensic Science Agency found no editing features, so false implication did not arise; the dagger was stained with human blood according to the FSL report and the post-mortem supported the cause of death. That the petitioner was a juvenile did not by itself entitle him to bail in a heinous case. Application dismissed and leave declined.
89	Imtiaz Naeem v. The State, 2025 SCMR 744 (Muhammad Hashim Khan Kakar, Salahuddin Panhwar, Ishtiaq Ibrahim JJ; 25.2.2025) †	Is a complainant's recognition of an accused's voice over a ransom call enough to convict?	Provisions: ss. 365-A and 302(b) PPC; Art. 185(3) Constitution. The accused were sentenced to death for abducting a child for ransom. The Court held that voice recognition, unlike fingerprints or DNA, lacks a standardized scientific framework for verification; calls, especially under duress, may suffer from poor quality or noise, so relying on voice recognition alone, without call records, witness testimony or forensic analysis, is inherently unreliable. There was also no legal recovery or discovery. Petition converted into appeal and allowed, convictions set aside. When identification is by voice the defence should demand a forensic voice comparison.
90	Azeem Khan and another v. Mujahid Khan and others, 2016 SCMR 274 (Asif Saeed Khan Khosa, Mushir Alam, Dost Muhammad Khan JJ; 15.10.2015) †	In a ransom case without eye-witnesses, what forensic records must the prosecution produce?	Provisions: ss. 365-A and 302(b) PPC; s. 7(e), Anti-Terrorism Act 1997. No voice record or transcript of the calls was on the record, the area from which the ransom call was made was not shown, and the most crucial proof was missing that the cell phone used for the demand belonged to the accused and the SIM was in his name. The attesting witnesses of the recovery memo were related to the deceased, and the number of bones recovered on pointation did not match the number sent to the Forensic Science Laboratory. The death sentences were set aside and the accused acquitted on benefit of doubt. Tally the exhibits sent to the Laboratory with the number recovered on the memo.
91	Sahib Shah v. The State, 2024 PCr.LJ 396 Peshawar (Musarrat Hilali, Ishtiaq Ibrahim JJ; 30.11.2022) †	Can identification of an accused only by his voice in the night found a conviction?	Provisions: ss. 324, 353, 427 and 34 PPC; s. 7, Anti-Terrorism Act 1997; s. 15, KP Arms Act 2013. The occurrence was at night and no source of light was provided. The High Court held that identification through voice is the weakest type of evidence and by itself is not sufficient for awarding even capital punishment (citing Ahmad Sher, PLD 1995 FSC 20, and earlier decisions). The appeal was allowed and the accused acquitted.
92	Muhammad Aslam v. The State and others, 2023 SCMR 397 (Umar Ata Bandial CJ, Sayyed Mazahar Ali Akbar Naqvi J; 20.12.2022) †	In a rape bail case, what are the gaps if no DNA or grouping test was done and the video was dated seven months before the FIR?	Provisions: s. 497(2) Cr.P.C. (further inquiry); Art. 185(3) Constitution. The Court noted that no DNA test or grouping test of semen was done, so it could not be held with certainty that the victim had been subjected to zina, especially as she was a married woman; the FSL report showed the video of the alleged occurrence was created about seven months before the FIR, contradicting the prosecution story; and the mobile phone from which the video was made had not been sent to the Laboratory. The accused had been in jail for a year. Petition converted into an appeal and allowed; bail granted.

No.	Citation	Question	Answer
93	Ghulam Fareed (deceased) through L.Rs. and others v. Mst. Daulan Bibi, 2024 SCMR 202 (Qazi Faez Isa CJ, Amin-ud-Din Khan, Athar Minallah JJ; 20.11.2023) †	How is a disputed thumb impression on a sale mutation proved?	Provisions: s. 54, Transfer of Property Act 1882; Art. 185(3) Constitution. The burden to prove the sale lay on the beneficiary, which was not discharged. The lady denied her thumb impression, came forward and had it sent to the Provincial Finger Print Bureau, which gave a comprehensive report, and a witness from the Bureau was produced; it was conclusively established that the thumb impression was not hers. Petition dismissed. A civil case, but the method (original document, expert, witness from the Bureau) is the model for criminal trials as well.
94	Amir Sultan Safi, Advocate v. Waqas Sabir, PLD 2025 Peshawar 50 (S M Attique Shah J; 28.9.2023) †	After closure of evidence, can a party ask for a forensic examination of a video to check its originality?	Provisions: s. 9(3), Punjab Forensic Science Agency Act 2007; Art. 164 Qanun-e-Shahadat 1984; s. 9, Defamation Ordinance 2002. Yes: with the advance of science any party may apply to the court for forensic examination of a video through an appropriate laboratory to establish whether it is genuine, edited or doctored, and the Trial Court, which dismissed the application as having come after closure of evidence, overlooked that the petitioner was seeking an expert opinion on originality and production of additional evidence in light of it. The revision petition was allowed. Applies to criminal trials in the same way.
95	Umer Khan v. The State and another, 2022 SCMR 216 (Maqbool Baqar, Sayyed Mazahar Ali Akbar Naqvi JJ; 1.11.2021) †	How does the mobile-phone FSL report weigh at the bail stage?	Provisions: s. 497 Cr.P.C.; Art. 185(3) Constitution. The social-media platform itself contacted the FIA; the accused's mobile phone was taken and sent to the FSL, whose report showed his social-media profile active on the phone and child pornographic videos and images extracted; the numbers he used were registered in his name. Although the offence did not fall within the prohibitory clause of s. 497 Cr.P.C. (maximum seven years), the nature of the accusation and the material merited refusal. Petition dismissed and bail refused. A positive digital forensic report can displace the ordinary rule that bail is the right in non-prohibitory offences.
96	Bakht Munir and 2 others v. The State and another, 2014 PCr.LJ 1472 Peshawar (Yahya Afridi, Khalid Mahmood JJ; 12.12.2012) †	What forensic and investigative steps corroborated an unnatural-offence case?	Provisions: s. 377 PPC. The report was lodged without delay, semen-stained clothes recovered from the spot confirmed the site, a mobile phone used to record the occurrence was recovered from the pocket of one accused, and four pieces of clothing with semen stains went to the Forensic Science Laboratory with a positive report. The IO investigated properly and the defence gave no reason for false implication. The conviction was maintained with the sentence reduced from life to a term of years, with s. 382-B benefit. Compare with Muhammad Aslam where those steps were absent.
97	Aslam Khan v. The State, 2021 PCr.LJ 1018 Peshawar (Ikramullah Khan, Ijaz Anwar JJ; 17.11.2020) †	How can the defence use handwriting comparison to test the murasila and recovery memo?	Provisions: s. 9(c), CNSA 1997; R. 6, Government Analysts Rules 2001. The complainant said he drafted the murasila, recovery memo and witness statements. On the defence's request his handwriting was obtained and placed on file as Mark-A, and on comparison it was much different from the murasila and the recovery memo, so they were not in his handwriting. Together with delay in sending the samples to the Laboratory and the chain of safe custody, the prosecution failed. The appeal against conviction (18 kg charas in a fuel tank) was allowed. Ask the court to take a specimen in the box and compare it.
98	Syed Zahir Hussain and another v. The State and another, 2018 YLR Note 186 Peshawar (Lal Jan Khattak, Qalandar Ali Khan JJ; 20.10.2017) †	The complainant said the murasila was not in his handwriting or the Excise Inspector's. What is the consequence?	Provisions: s. 9(c), CNSA 1997. The complainant said the murasila was written on his dictation by a constable whose name he did not remember, and the same was true of the recovery memo and card of arrest. The IO admitted the Excise Inspector had called the complainant to the place where the accused had been apprehended. These circumstances created doubt about the veracity of the prosecution case (6,000 g charas garda in five packets) and the appeal was accepted. The scribe's identity and handwriting are matters for the defence to establish in cross-examination.

No.	Citation	Question	Answer
99	Muhammad Yousuf v. The State and others, 2026 PCr.LJ 1427 Peshawar, Dera Ismail Khan Bench (Muhammad Faheem Wali, Dr. Khurshid Iqbal JJ; 7.11.2023) †	If the Head Constable admits the murasila was written by an unnamed constable, can the report be treated as genuine?	Provisions: ss. 302(b) and 404 PPC. The Head Constable admitted that the murasila was not in his handwriting, that it was written by a Constable under his dictation whose name was not mentioned, and that the injury sheet was not in his handwriting either; the murasila did not say that the injured was brought by Rescue 1122, and the police reporting centre in the DHQ hospital was bypassed. No explanation was offered; the manner of lodging the report was highly doubtful and the appeal against conviction was allowed. A handwriting comparison of the murasila could have settled the matter.
100	Zaram Khan v. The State and another, 2026 YLR 186 Peshawar, Abbottabad Bench (Sadiq Ali J; 18.4.2024) †	How can the accused use forensic proof of electronic alibi evidence at the bail stage?	Provisions: s. 497 Cr.P.C.; s. 302 PPC. The petitioner pleaded alibi and produced mobile phone location data, check post entries, CCTV footage and photographs from a guest house with its register, and CCTV from the DPO office. The IO collected the material and had it examined by the Forensic Science Agency, which found no traces of editing, tampering or manipulation. This verified evidence strongly supported his absence from the scene and bail was granted. Request the IO to send the alibi material for forensic examination as soon as it is collected.
101	Jana Gul v. The State, 2002 PCr.LJ 1490 Peshawar (Tariq Pervez Khan, Ijaz-ul-Hassan JJ; 30.5.2002) †	Is the Chemical Examiner's report admissible if he is not examined, and is it fatal that the carrier of the sample is unknown?	Provisions: ss. 9 and 25, CNSA 1997; s. 510 Cr.P.C. Under s. 510 the report of the Chemical Examiner is per se admissible without calling him, although the court may examine the expert itself or at a party's request. The Bench held that omission to show who took the sample to the Laboratory or who incorporated the murasila into the FIR was an irregularity and not fatal. The appeal was dismissed. This is the old contra authority; the Supreme Court has since made the carrier's evidence essential (Zahir Shah, 2019 SCMR 2004; Said Wazir, 2023 SCMR 1144).
102	Abid and another v. The State, 2025 SCMR 1710 (Athar Minallah, Irfan Saadat Khan, Malik Shahzad Ahmad Khan JJ; 29.4.2025) †	The FSL said human blood of the same group was found on the churri, dupatta and belt. Is that sufficient to corroborate the retracted confessions?	Provisions: s. 302 PPC; judicial confessions recorded under s. 164 Cr.P.C. (retracted); Art. 185 Constitution. The stomach contents of the deceased were sent to the Laboratory, which found no drug (contrary to the confessions, which said sleeping pills were given). The prosecution did not bring on record the blood group of the deceased, so the statement that the articles bore blood of "the same group" was not sufficient. Appeals allowed. Always require the deceased's blood group to be proved before the report is accepted.

Annexure B: One Hundred and Twenty-Three Practical Points for Recording and Testing Forensic Evidence

These points are meant to be taken to the court room. They are grouped by witness. Where a point rests on a reported judgment, the case is named in brackets and can be found in Annexure A or in the paper. Points marked for the prosecution or the defence are written for that side; the others are useful to both.

1. Before the trial: building the forensic timeline

1. Draw one page with every date and hour: occurrence, recovery, sealing, Moharrir's entry in Register XIX, dispatch, receipt at the laboratory, date of the report, date it reached the court. Attach the exhibit number beside each entry.
2. For firearms add three more dates: arrest of the accused, recovery of the weapon, and the date on which the empties and the weapon each reached the laboratory (Nawab Siraj Ali, 2023 SCMR 16).
3. Count the days between each pair of entries and write the number on the sheet. A number is easier to put to a witness than a date.
4. Collect every document that touches the article: seizure memo, sealing note, test memorandum (Form-I), road certificate, receipt, rahdari, laboratory register entry, report, and the order releasing the parcel back to the police.
5. Check each document for the name, rank and number of the officer who signed it. The same number should appear in the witness's evidence (Farman Ali, 2025 SCMR 1730, where the laboratory report gave only the number 5915).
6. Read the report against Rule 6 of the Government Analysts Rules: tests, results of each test, protocols, prescribed form (Khair-ul-Bashar, 2019 SCMR 930).
7. Ask whether the report on the file is the original or a duplicate (Zubair Khan, 2021 SCMR 492).
8. Compare the weight in the recovery memo, the weight of each packet when produced in court and the weight in the report (Tariq Sajjad Khan, 2026 SCMR 1215).
9. List the witnesses cited in the calendar under section 173 Cr.P.C. and note whether the Moharrir and the carrier are among them.
10. Mark whether a defence application for forensic examination of any article, recording or document is needed before evidence is closed (PLD 2025 Peshawar 50).

2. The seizing officer / complainant

11. Ask where the sample was drawn: from each packet, each slab, or from a few (State v. Javed Iqbal, 2021 YLR 662, where 4 g came from five packets).
12. Ask how the sample was weighed and who weighed it, and whether the scale and the weights appear in the memo.
13. Ask what he did with the sample parcels and the remaining case property, minute by minute, from the spot to the police station.
14. Ask whose monogram or seal was put on the parcels and why; compare it with the names on the memo (State v. Javed Iqbal; Jamal-ud-Din, 2026 MLD 1372).
15. Ask who signed the parcels. If he says he did, ask the recovery witness the same question (Abdul Raheem, 2026 SCMR 1516).
16. Ask the name of the constable who carried the case property to the police station, and whether the murasila went with him (Zakir Ali, 2025 SCMR 1644).
17. Ask to whom he handed the case property and the sample parcels at the police station and whether a receipt was given (Muhammad Nasir, 2026 SCMR 224).
18. Ask whether he drafted the application to the laboratory himself and in what handwriting the murasila, the recovery memo and the application are written; ask the court to take a specimen (Aslam Khan, 2021 PCrLJ 1018).

19. Ask whether he was also the Investigating Officer; the Supreme Court noted the effect on neutrality in Raham Gul (2026 SCMR 584).
20. Ask whether proceedings were conducted on the spot or at the police station, and why they were shifted (Raham Gul).
21. Ask whether CCTV existed near the place and whether he collected it (Muhammad Nasir; Tariq Sajjad Khan).
22. Ask whether independent witnesses were joined, and if not, what he did to find them.
23. Ask whether the registered owner of the vehicle was joined or examined (Mehmood Khan, 2026 SCMR 1606).
24. For a firearm case, ask when the empties were picked up and whether the police returned to the spot a second time (Fateh Khan, 2025 SCMR 1408).
25. Ask whether the empties were sealed, by whom, and where they were kept until they were dispatched.

3. The Moharrir / malkhana in-charge

26. Ask for Register No. XIX and Register No. 19 to be produced and exhibited; ask for the date and hour of each entry (Jeehand, 2025 SCMR 923; Raham Gul).
27. Ask who handed him the parcels, at what hour, and whether he gave a receipt (Zakir Ali).
28. Ask whether the parcels were sealed when he received them and with whose seal, and whether the seal was intact when they left.
29. Ask where in the malkhana the parcels were kept, whether the room is locked, and who holds the key.
30. Ask who else had access to the malkhana during the intervening days (Muhammad Hazir, 2023 SCMR 986).
31. Ask whether he handed any parcel to anyone other than the carrier, and whether the entry shows the carrier's name and number.
32. Ask whether the road certificate was prepared by him and whether he kept a copy.
33. Ask whether he received the parcels back from the laboratory, and when, and who brought them (Abdul Raheem).
34. Ask whether he recorded the statements of the officers who dealt with the parcels under section 161 Cr.P.C. (Zakir Ali).
35. Ask whether there are other parcels in the same period, from other cases, and how they were kept apart.
36. If he is not produced, ask for an inference under Article 129(g) of the Qanun-e-Shahadat (Muhammad Raziq, 2025 YLR 26; Asad, 2021 YLR 254).

4. The carrier constable

37. Ask at what time he left the police station and with what documents: test memorandum, road certificate, application, letter.
38. Ask whether he went straight to the laboratory, which vehicle he used, and where the parcels were during the journey.
39. Ask at what time he reached the laboratory, to whom he handed the parcels, and what receipt he was given (Muhammad Imtiaz, 2024 YLR 1390).
40. If the receipt shows the next day, ask where the parcels spent the night (State v. Safiullah Khan, 2025 YLR 506).
41. Ask whether the laboratory staff checked the seals and recorded the condition of the parcels.
42. Ask whether he brought the stamped receipt back and to whom he gave it.
43. Ask him to identify the signature and number on the laboratory's report if the report carries only a number.

44. Check that his name is on the calendar of witnesses and that he is produced; if not, request an adverse inference (Farman Ali; Zahir Shah, 2019 SCMR 2004).

45. Compare his account with the Moharrir's on time of departure and with the laboratory's on time of receipt.

5. The Investigating Officer on forensic matters

46. Ask why the article was sent when it was and not earlier; ask for the case diary entry (section 172 Cr.P.C.).

47. For narcotics, ask why the sample was not sent within seventy-two hours (Rule 4(2)) and where it was in between (Sagheer Ahmed, 2024 SCMR 913).

48. For empties, ask the date of recovery, the date of arrest and the date of dispatch; put the three dates in one question (Iftikhar Ahmed, 2026 SCMR 1010).

49. Ask whether the empties and the weapon travelled together; if yes, put the rule in Sarfraz (2023 SCMR 670).

50. Ask who took the empties and the pistol to the laboratory and whether he annexed the daily diary (Arshad Ali, 2024 MLD 212).

51. Ask why the pistol was taken in the case eight days after the arrest and where it was until then (Fazal Dayan, 2021 YLR Note 106).

52. Ask whether blood-stained earth, cotton and clothes were sent with the weapon (Muhammad Asif, 2017 SCMR 486).

53. Ask whether the deceased's blood group was ascertained and placed on the record (Abid, 2025 SCMR 1710).

54. Ask whether he marked the empties on the site plan at the same points as in the recovery memo (Riasat Ali, 2024 SCMR 1224).

55. Ask whether he sent the mobile phone or recording for forensic examination and what he did with the result (Muhammad Aslam, 2023 SCMR 397).

56. Ask whether he asked for a DNA or grouping test in a sexual offence and why not.

57. Ask about the other cases in which the same weapon was recovered; compare dates (Javed Khan, 2017 SCMR 524).

58. Ask him not to give an opinion on what an expert's report proves; it is for the court (Hayatullah Khan, 2011 SCMR 1354).

59. Ask whether any report was awaited when he submitted the challan (Atiya Bibi, 2026 MLD 518).

6. The Chemical Examiner / Government Analyst

60. Ask for the qualification and notification of the Analyst (Rule 3; Aman-ul-Haq, 2020 PCrLJ 1263).

61. Ask on what day and hour the parcel was received and in what condition: seals, wrapping, weight.

62. Ask what quantity was received and what quantity was tested, and how the sample was homogenised.

63. Ask what tests were done, in what order, with what protocols, and where each is recorded in the report (Rule 6).

64. Ask whether the report is on the prescribed form and in how many copies it was prepared.

65. Ask what was done with the remainder and to whom it was returned (Abdul Raheem).

66. Ask whether the Analyst compared the weight of the sample to the weight stated in the test memorandum.

67. Ask whether he checked the monogram on the seals against the test memorandum.

68. For Ice and heroin, ask what instruments were used and when they were last calibrated.

69. If the Analyst is not called under section 510, ask the court to examine him on the defence's application.

7. The Firearm Expert

70. Ask on what day each item (empties, weapon) was received and from whom (Nawab Siraj Ali).
71. Ask whether the empties were received before or with the weapon.
72. Ask what test marks he compared, and whether he made photographs and kept them.
73. Ask whether he can say how many weapons were used from the empties alone (Hazrat Noor, 2025 YLR 1371).
74. Ask whether a report on the working condition of a gun can show that it was fired at the date of the offence (Sher Umar Khan, PLD 2015 Peshawar 143).
75. Ask whether the empties could be fired from another weapon of the same make and bore.
76. Ask whether the report is positive for every empty or only for some.
77. If the report is negative, ask the witness to confirm the negative and note that the prosecution cannot ignore it (Ashraf Ali, 2016 PCrLJ Note 63).
78. Ask whether any pellets or bullets were examined, and whether their recovery and the postmortem recovery match.
79. Ask for the records of the laboratory showing the date and the hand-over.

8. The Serologist / blood and DNA

80. Ask whether the blood on the weapon was compared with the blood group of the deceased, and what that group is (Abid, 2025 SCMR 1710).
81. Ask whether the earth and the clothes were received together with the weapon (Muhammad Asif).
82. Ask on what date the sample was taken and on what date it reached the laboratory; ask about decomposition (Tasir Ullah, 2018 YLR Note 182).
83. Ask whether the blood was human and whether the group could be determined.
84. Ask for the DNA profile and the source of the reference sample, if DNA is relied on, and the chain of that reference sample (PLD 2026 SC 251).
85. Ask what the result would be if the sample were contaminated and how that was ruled out.
86. In a sexual offence ask whether a semen grouping or DNA test was done, and if not why not (Muhammad Aslam).

9. Audio, video, CCTV and digital evidence

87. Insist on the person who made the recording (PLD 2019 SC 675); ask him to produce the original device or storage.
88. Ask for the source and the date on which the recording was acquired, and the date it was first disclosed to the court.
89. Ask whether the recording was played in court and whether it is audible or viewable.
90. Ask who identified the voices or persons and on what basis; ask for a forensic voice or facial comparison.
91. Ask who prepared the transcript, and under whose supervision.
92. Ask for the safe custody record from the day of the recording to the day of production.
93. Ask whether the recording is the actual record of the event as it happened, or an edited version; request forensic examination (Kamran, 2024 SCMR 1419).
94. Ask whether it was an automatic recording without human intervention (PLD 2026 SC 251).
95. Ask whether the person who made the recording is the person who produced it, and why he was recording (a trap or a routine).

96. Ask for the hard disk and the DVR, not only a copy (PLD 2026 SC 251).

97. If the prosecution does not rely on CCTV that exists, press for an adverse inference (Muhammad Nasir; Tariq Sajjad Khan).

98. For an alibi built on location data, CCTV and registers, request that the Investigating Officer send it for forensic examination (Zaram Khan, 2026 YLR 186).

99. Where a recording is produced late, remind the court that it may be looked at with suspicion (PLD 2019 SC 675).

100. Where identification rests on voice alone, argue that it is the weakest evidence (Sahib Shah, 2024 PCrLJ 396; Imtiaz Naeem, 2025 SCMR 744).

101. Ask whether the SIM and the cell phone were proved to be in the name of the accused and call data records produced (Azeem Khan, 2016 SCMR 274).

10. Handwriting, fingerprints and documents

102. Ask the court to take a specimen of the scribe's handwriting in the witness box, and compare it with the murasila or the memo (Aslam Khan, 2021 PCrLJ 1018).

103. If the scribe says the murasila was dictated to another constable, ask the constable's name and ask for him to be called (Syed Zahir Hussain, 2018 YLR Note 186; Muhammad Yousuf, 2026 PCrLJ 1427).

104. For a thumb impression or fingerprint, send the document to the bureau and call a witness from it (Ghulam Fareed, 2024 SCMR 202).

105. Ask whether the questioned and the admitted impressions were taken in the presence of a magistrate or in court.

106. Ask for the original document, not a copy, for any comparison.

11. The prosecutor's side

107. Make a table for each exhibit and keep it in the file: who took it, when, what for, and who received it.

108. Produce the Moharrir and the carrier in every narcotics case, and have the register in the witness's hands.

109. If the Moharrir is dead or transferred, prove the entry by someone who can identify the handwriting.

110. Prepare the Analyst to explain the protocols if the defence applies (Rule 6).

111. Send empties for comparison separately and before the weapon is recovered, or record why this was not possible.

112. Where a delay is unavoidable, prove the reason by the case diary and a witness (Kashmaloo, 2024 PCrLJ 174 and Haris, 2023 MLD 924 show a complete record).

113. Bring the report and the road certificate with the stamped receipt; they answer most challenges (Asad Khan, 2026 PCrLJ 781).

114. Do not abandon witnesses of transmission without a reason recorded in the order (Ameenullah, 2026 SCMR 870).

115. For a recording, prepare the checklist from PLD 2019 SC 675 and tick every item through witnesses.

12. Closing and appeal

116. In the final arguments, give the court the timeline table and the three or four cases that match the facts.

117. Put the rule once and the facts at length; the Supreme Court decides on the facts of the chain.

118. If the chain is complete, do not argue the point; move to the next ground, since the cases show convictions upheld on a full record (Zeeshan Khan, 2026 SCMR 1697).

119. In bail, rely on delay, missing carrier and awaited report as grounds of further inquiry (Sagheer Ahmed; Hamid Ullah, 2026 YLR 229).

120. In an appeal against acquittal remind the court that a double presumption of innocence applies and an acquittal on a broken chain is not perverse (State v. Safiullah Khan; State v. Javed Iqbal).

121. Check the quantity for sentence if only a consolidated sample was tested (Hasrat Khan, PLD 2024 SC 911).

122. Where co-accused stand differently, ask for the benefit that depends on the link each has to answer (Muhammad Imtiaz Baig, 2024 SCMR 1191).

123. Before filing, read the judgment, not the head-note, and confirm the citation page.

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Annexure C: One Hundred Terms Used in the Judgments, With Their Meanings

These meanings explain how each term is used in the judgments cited in this paper. They are general explanations for the reader and are not quotations from the judgments.

No.	Term	Meaning
1	Chain of custody	The unbroken record of who held the seized article from the moment of recovery until it was tested and produced in court; the Supreme Court calls it pivotal (Imam Bakhsh, 2018 SCMR 2039).
2	Safe custody	Keeping the article sealed in a place (usually the malkhana) where it could not be tampered with, with an entry in the register.
3	Safe transmission	Carrying the sealed sample from the police station to the laboratory by a known person, with documents, without interference.
4	Malkhana	The police station storeroom where case property is kept.
5	Moharrir / Moharrar	The police station clerk who keeps the registers and receives case property in the malkhana.
6	Register No. XIX (Register No. 19)	The register in which case property and its movements are entered under Rule 22.70 of the Police Rules, 1934.
7	Form-19	The entry form in the case property register; the time of the entry matters (Raham Gul, 2026 SCMR 584).
8	Road certificate	The document that goes with the parcel on its journey to the laboratory and returns stamped, showing departure and arrival.
9	Rahdari	The receipt or travel permit given to the carrier for taking the parcel to the laboratory.
10	Test memorandum (Form-I)	The covering paper under which a sample is sent for analysis under Rule 4(2) of the Government Analysts Rules.
11	Seventy-two hours	The period within which samples should be dispatched for analysis under Rule 4(2) of the Government Analysts Rules.
12	Carrier constable	The police constable who carries the sample parcel to the laboratory.
13	Government Analyst	The official analyst, under section 36 of the Control of Narcotic Substances Act, whose report is admissible without formal proof.
14	Chemical Examiner	The government chemist who analyses narcotics, blood, stomach contents and other articles and reports.
15	Narcotics Testing Laboratory	The laboratory, such as the Federal Narcotics Testing Laboratory, that tests seized drugs.
16	Forensic Science Laboratory (FSL)	The laboratory that examines firearm, blood, drug, digital and other articles for the police.
17	Punjab Forensic Science Agency (PFSA)	The Punjab agency whose reports are per se admissible under section 9(3) of the 2007 Act.
18	Forensic audit	A forensic examination of a recording or document to see whether it is genuine (Mian Khan, 2021 SCMR 1077).
19	Firearm Expert / Ballistic Expert	The expert who compares empties and bullets with a weapon and says whether they were fired from it.
20	Serologist	The expert who tests blood and body fluids for species and group.
21	Crime empties	Spent cartridge cases found at the scene.
22	Spent bullets	Fired bullets or projectiles recovered from the scene or the body.
23	Crime weapon / weapon of offence	The firearm or instrument said to have been used in the offence.
24	Positive report	A laboratory report supporting the prosecution case, such as a match or the finding of a drug.
25	Negative report	A laboratory report that does not support the prosecution, for example empties not fired from the weapon (Ashraf Ali, 2016 PCrLJ Note 63).
26	Working condition report	A report that a gun can fire; it does not show that it was fired in the offence.
27	Recovery memo	The written memorandum of a seizure, signed by the recovery witnesses.
28	Pointation	The accused pointing out a place or object to the police; recovery on pointation is a recovery on his disclosure.
29	Disclosure	A statement of the accused leading to discovery of a fact.
30	Sample parcel	The sealed packet containing the sample sent to the laboratory.

No.	Term	Meaning
31	Representative sample	A sample that fairly represents the whole recovery; taken from each packet or slab.
32	Consolidated sample	One sample made from several packets; only its weight may be counted for sentence (Hasrat Khan, PLD 2024 SC 911).
33	Collective report	One laboratory report covering many samples (Jeehand, 2025 SCMR 923).
34	Secret cavity	A hidden compartment in a vehicle where narcotics were found.
35	Slab / cake	A pressed block of charas.
36	Charas	Cannabis resin, the commonest narcotic in the reported cases.
37	Heroin	An opiate listed in the first schedule of the Act, charged as a separate substance.
38	ICE (methamphetamine / amphetamine)	A synthetic drug charged under the KP Act of 2019.
39	Contraband	The prohibited substance recovered.
40	Case property	Everything seized in the case and produced in court.
41	Seal / monogram	The impression put on a parcel by the officer who seals it; its letters should match his name.
42	De-sealing	Opening the sealed parcel in court; the court should note whose seals it bore (Abdul Raheem, 2026 SCMR 1516).
43	Duplicate report	A copy of the report instead of the original; held inadmissible in Zubair Khan (2021 SCMR 492).
44	Protocol	The test method applied by the analyst, which must be named in the report (Rule 6).
45	Prescribed form	The form in which the report must be prepared under the Rules, in quadruplicate.
46	Rule 6	The rule of the Government Analysts Rules that sets out what the report must contain.
47	Section 36	The section of the Control of Narcotic Substances Act that makes the analyst's report admissible without formal proof.
48	Section 29	The section of the Act raising a presumption against a person in possession (Raham Gul, 2026 SCMR 584).
49	Conscious possession	Knowledge of and control over the contraband, which the prosecution must prove (Hussain Shah, PLD 2020 SC 132).
50	Section 510 Cr.P.C.	The section making the report of an expert admissible without calling him.
51	Article 129(g)	The presumption that evidence withheld would be unfavourable to the party withholding it.
52	Adverse inference	The inference the court draws against the party that withholds a witness or document.
53	Article 164	The Qanun-e-Shahadat Article allowing evidence from modern devices and recordings.
54	Article 59	The Qanun-e-Shahadat Article on opinion of experts.
55	Benefit of doubt	The rule that the accused is acquitted if the prosecution leaves a reasonable doubt; one circumstance suffices.
56	Further inquiry	The stage at which bail is granted under section 497(2) Cr.P.C. because guilt needs more inquiry.
57	Prohibitory clause	The part of section 497(1) Cr.P.C. that bars bail in offences punishable with death or life.
58	Reappraisal of evidence	Re-reading the whole evidence on appeal, as the Supreme Court does in criminal appeals.
59	Converted into appeal	A petition for leave which the Supreme Court treats as an appeal and decides at once.
60	Leave declined	The Supreme Court's refusal of leave to appeal, leaving the lower court's decision in place.
61	Short order	A brief order announced first, with reasons recorded later.
62	Infructuous	Having become pointless, as a revision after the main appeal is allowed.
63	Corroborative evidence	Evidence that supports the main evidence but cannot replace it (Khalid, 2018 MLD 398).
64	Ocular account	The account of the eye-witnesses.
65	Direct evidence	Evidence of a witness who saw the offence.
66	Circumstantial evidence	Evidence of facts from which the offence is inferred; the chain must be unbroken.
67	Foul play	The Supreme Court's term for sending empties with the weapon, suggesting the Investigating Officer kept them for no good reason (Sarfraz, 2023 SCMR 670).
68	Inconsequential	Of no effect on the outcome; used for recoveries that do not help the prosecution.

No.	Term	Meaning
69	Inordinate delay	A delay that is long and unexplained.
70	Link in the chain	One step in the proof; a missing link gives the accused the benefit (Asif Ali, 2024 SCMR 1408).
71	Hot pursuit	Arrest while chasing the accused immediately after the offence.
72	Murasila	The written report sent from the spot or hospital to the police station for registration of the FIR.
73	Scribe	The person who writes the murasila or the FIR.
74	FIR	The first information report registered under section 154 Cr.P.C.
75	Case diary	The Investigating Officer's day-to-day record under section 172 Cr.P.C.
76	Daily diary (roznamcha)	The police station's day book recording departures, arrivals and arrests.
77	Calendar of witnesses	The list of prosecution witnesses attached to the report under section 173 Cr.P.C.
78	Section 161 statement	A witness's statement recorded by the police; late recording harms its value.
79	Section 164 statement	A statement recorded by a Magistrate, including a confession.
80	Site plan	The map of the scene prepared by the Investigating Officer, showing the points where the witnesses and the empties were.
81	Recovery witness	A witness to a seizure or recovery; independent witnesses are preferred.
82	Independent witness	A witness with no connection to the police or the parties.
83	Interested witness	A witness related to the deceased or with a motive to implicate the accused (Azeem Khan, 2016 SCMR 274).
84	Retracted confession	A confession later withdrawn by the accused.
85	Alibi	The plea that the accused was elsewhere; proved here by CCTV, registers and location data (Zaram Khan, 2026 YLR 186).
86	CCTV	Closed-circuit television footage.
87	DVR	The digital video recorder that stores CCTV footage.
88	Hard disk	The storage device on which a recording is saved; produced with the footage.
89	Editing / tampering	Altering a recording; the forensic examination looks for it.
90	Transcript	The written text of a recording, to be prepared under independent supervision (PLD 2019 SC 675).
91	Voice recognition	Identifying a speaker by voice; held weak and unreliable alone (Imtiaz Naeem, 2025 SCMR 744).
92	Call Data Record (CDR)	The telephone company's record of calls, used to link phones and persons.
93	SIM	The subscriber identity module; its registration in the accused's name must be proved.
94	DNA	The genetic profile used to match biological material to a person.
95	Grouping test	A test determining blood or semen group.
96	Human blood of the same group	A serology finding that is of no use unless the deceased's group is proved (Abid, 2025 SCMR 1710).
97	Blood-stained earth	Soil from the scene sent to the laboratory to confirm the place of occurrence.
98	Fingerprint Bureau	The agency that compares fingerprints and thumb impressions.
99	Thumb impression	The print of the thumb on a document in place of a signature.
100	Specimen handwriting	Writing taken from a person to compare with a questioned document (Aslam Khan, 2021 PCrLJ 1018).

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