

**RESEARCH PAPER****Unveiling Flaws in Test Identification Parades: A Guide for Reliable Identifications****<sup>1</sup>Burhan Maqsood, <sup>2</sup>Muhammad Waqas Sarwar and <sup>3</sup>Hafiz Muhammad Azeem\***

1. LL.M. Scholar, Maurice A. Deane Law School, Hofstra University, New York
2. Lecturer, College of Law, Government College University, Faisalabad, Punjab, Pakistan
3. LL.M. University Law College, University of the Punjab, Lahore, Punjab, Pakistan

**Corresponding Author**

Hafizazeemkhokhar@gmail.com

**ABSTRACT**

Test Identification Parades (TIPs) play a vital role in criminal cases where witnesses are unacquainted with the offender. Although some directives exist in the Punjab Police Rules, 1934, and Lahore High Court Rules and Orders, Volume III, for the procedure of TIP, yet there is no independent legislation available on it. Many common errors occur during TIPs. This paper aims to highlight those common errors and to offer a practical guide containing guidelines and recommendations to comprehend the procedure of TIP. This study primarily employs analytical legal research methodology. Through an analysis of 20 TIP-related cases, 20 common errors were found. This research concludes that a lack of awareness about TIP procedures hinders successful trials. It recommends independent and joint training programs for all involved in TIP. This study also provides comprehensive recommendations for conducting error-free TIPs.

**Keywords:** Criminal Justice System, Identification, Investigation, Test Identification Parade (TIP), Witness Memory

**Introduction**

The TIP is basically designed to measure the credibility of a witness's capacity to identify an unfamiliar person who is pointed out as accused from an array of various individuals, whom the witness had seen during the incident. The purpose is to check that whether the witness had had the opportunity to see the accused, as alleged, and whether they can recall the accused's face along with his role in the incident, and whether they can identify him in court on the basis of his memory (Anand, 2009). TIP is pertained to details pertinent to the identification of persons implicated in a criminal case. It serves as an investigative tool, which is utilized by law enforcement agencies. It requires collaboration of witnesses. It is a part of investigation of a case. The witness is to identify unknown offenders during investigations. The objective of TIP is to determine whether the offender under scrutiny is indeed the actual offender or not (Perera, 2021).

The identification of persons embraces significant importance within the CJS because to find a true offender can become a challenging task during criminal proceedings. Sometimes, it becomes an established fact that crime has been committed, but who commits it requires identification. And sometime, it also becomes necessary not only to identify the accused but also the victim (Rajamanickam\* & Kung, 2018). TIP is basically the procedure for detection of accused by the witnesses.

The purpose of conducting a TIP is to permit witnesses to approve that the accused they pointed out is indeed the same person they saw during the crime scene. It also aims to assure investigating authorities that the accused is genuinely the same individual that has been witnessed in relation to the alleged incident. This process principally ensures that the investigation progresses in the correct direction. It also provides authentication for the evidence of the witness which he will later provide in court-room during the trial

proceedings. Hence, the TIP is mainly intended for fact-finding purposes (*Suresh Chandra Bahri v. State of Bihar, 1994*).

Furthermore, it is now also a well-established principle that substantive evidence in court often revolves around the proof of identity of persons. This legal stance has been firmly established through numerous court decisions. The facts establishing the identity of accused embrace relevance under the law of Evidence. Characteristically, the primary evidence presented by a witness in court is their statement made during the proceedings. However, the evidence of recognizing the accused for the first-time during trial is fundamentally a weak one. Therefore, the purpose of prior TIP is to evaluate and strengthen the reliability of such evidence. As a prudent approach, it is generally sensible to seek corroboration of the evidence, which includes earlier TIPs procedures. TIPs are part of the investigative stage. Though there is no legal requirement in the law which obliges investigating agencies to conduct them, nor does it grant the accused the right to demand one, however, it is a part of corroboration. These parades do not serve as substantive evidence. The valuation of their reliability, in the end, falls within the jurisdiction of the trial courts (*Amitsingh Bhikamsing Thakur v. State of Maharashtra 2007*).

Moreover, conducting a TIP does not establish substantive evidence, but it can serve as corroborative evidence to support the belief that the person offered before the court as accused is indeed the person involved in the commission of the crime. However, even if a TIP is conducted, it may not always be considered as steadfast evidence upon which the conviction of the accused can be solely based. TIP is a prudent rule to be followed, particularly in cases where the accused is unfamiliar to the witness or the complainant (*State of H.P. v. Lekh Raj 1999*). The TIP serves as a vital method for gathering firsthand evidence from reliable witnesses. It not only verifies the accuracy of the witness's testimony but also plays a vital role in evaluating the investigation. Ultimately, the primary goal of the TIP is to assess the reliability and confidence level of the witness (Kumar, 2023).

The concept of TIP was adopted from English law into our legal system. However, our law does not specify the procedure, in a single enactment or rule, for conducting TIPs. In many other jurisdictions, these parades are carried out by police officers at police stations, but in Pakistan, it is prohibited. In Pakistan, there is no established mechanism for police officers to conduct TIPs, maybe therefore, they commit recurring common errors. However, proper TIP is not only the responsibility of police, but also magistrates (Rajamanickam\* & Kung, 2018).

## Material and Methods

Regarding the research methodology, this study primarily employs a qualitative approach to analyze the intricate use of TIP during a trial (Hervey et al., 2011). Data is assembled from primary and secondary sources. The primary source of data will be legal sources including the statutory law, relevant judicial pronouncements. Moreover, legal commentaries available on the subject have also been used. Further, main reliance has been placed on the doctrinal research as this method is still considered to be one of the best research methodology in the field of law (Hutchinson, 2013). Through an analysis of 20 recent most leading Pakistani TIP-related cases, wherein acquittal has been pronounced by the courts due to TIP, this research identifies 20 recurring errors committed by investigating agency and magistrates. In this work, a content analysis of these sources will be made to discover the guideline surrounding TIP, its interpretation by the courts, and the recognized safeguards to make its use more effective. Additionally, relevant scholarly articles, reports, and news articles (Elias, 2009) along with the online material (Atkinson, 1996), will also be consulted to incorporate diverse and effective viewpoints available on the regulations and proper procedures of TIPs in Pakistan and India.

**Case Laws****Table 1  
Analysis of 20 Cases**

<b>Sr No.</b>	<b>Reported Citation</b>	<b>Title of the Case</b>	<b>Common Errors</b>	<b>Errors Committed By</b>
1.	2024 PcrLJ 396	Sahib Shah v. the State.	Complainant has already nominated the accused through his statement, then there is no need of TIP.	Police and Magistrate
2.	2023 YLR 1094	Muhibullah v. the State.	Delay in conducting TIP, and TIP was held in Police Station	Police and Magistrate
3.	2023 YLR 926	Muhammad Shaban alias Shabani v. the State.	Non-mentioning of facial features of the accused by the witnesses in their statements before investigating agencies.	Police and Witnesses
4.	2023 YLR 2072	Umair Ashraf v. the State.	Non-mentioning of hulia/dress of the accused by the witnesses in their statements before investigating agencies.	Police and Witnesses
5.	2023 YLR 780	Syed Aijaz Ali Shah Qadri v. the State.	Delay in TIP, further witnesses who participated in TIP were not named in the challan/investigation report by the police	Police
6.	2023 MLD 1795	Atta Muhammad v. the State.	No independent witnesses were provided for TIP except police officials	Police
7.	2022 PcrLJ 1356	Muhammad Saleem v. the State.	Accused was under investigation and on remand with police when his TIP was conducted in jail premises	Police and Magistrate
8.	2022 PcrLJ 286	Abid Ali v. the State.	Witness identified accused without any role	Police and Witnesses
9.	2022 YLR 1822	Jamshaid alias Bablu v. the State.	Joint TIP was neither acceptable nor reliable	Police and Magistrate
10.	2022 YLR 587	Abdul Majeed alias Cheeta v. the State.	No features were mentioned in the FIR, Accused were already nominated through statements of witnesses, then there is no need of TIP.	Police and Witnesses
11.	2022 PcrLJ 489	Muhammad Atif v. the State.	Joint TIP was neither acceptable nor reliable	Police and Magistrate
12.	2022 YLR 2276	Syed Ahmed Hussain Salman v. the State.	Features of dummies used in TIP were different with the accused	Magistrate
13.	2022 YLR 1837	Mohammad Shoaib v. the State.	No role was assigned while identification during TIP	Witnesses
14.	2022 YLRN 193	Muhammad Ismail v. the State.	Number of dummies were insufficient in TIPs	Magistrate
15.	2021 SCMR 1725	Inhaf Ullah v. the State.	Non conduct of TIP	Police
16.	2021 PcrLJN 77	Aneel Iqbal alias Nomi v. the State.	Violation of Rule 26.32 of Police Rules 1934, Irregular selection of dummies, Non-mentioning the features of dummies in TIP report Non-mentioning the features of accused in TIP report	Magistrate
17.	2020 SCMR 310	Noor Islam v. Ghani ur Rehman.	Features of dummies and accused were not mentioned in TIP report	Magistrate
18.	2020 YLR 644	Nasrullah v. the State.	All ocular witnesses did not participate in TIP	Police and Witnesses

19.	2020 MLD 841	Anwar v. the State.	Accused already nominated then there was no need of TIP	Police
20.	2020 YLR 1662	Muhammad Ibraheem v. the State.	Joint TIP, Features of dummies were not mentioned, Features of accused were not mentioned, Non selection of dummies in accordance with accused	Magistrate

### Common Errors

Analysis of the most recent case laws shows that the following common errors have been repeatedly committed during the conduct of TIPs.

**Table 2**  
**20 Common Errors**

Sr. No.	Common Errors
1.	When complainants have already nominated the accused person in their statements, either before the police or before the magistrate, then conducting a TIP creates doubt in the minds of trial judges.
2.	It has also been observed that in most cases, TIP is conducted with a considerable delay. The delay in conducting TIP adversely affects the memories of witnesses. In cases where TIP is conducted with delay, the courts give no value to the TIP.
3.	The courts, through their recurring pronouncements, have time and again observed that TIP should not be conducted in police stations. Despite this, as observed in the above-referred case, TIPs are being conducted within police stations. It is a common error in TIPs.
4.	Since TIP is a memory test, the courts have guided that facial features of the accused by the witnesses in their statements before investigating agencies are an essential element to gauge the memory of witnesses. In most of the cases, those features are not provided, resultantly, TIP fails. The police are responsible for this error.
5.	Not only the facial features, but also the non-mentioning of hulia/dress of the accused by the witnesses in their statements before investigating agencies proves fatal for giving effect to the TIPs.
6.	Surprise witnesses are not favored. It has also been observed that in some cases, witnesses who participated in TIP were not named in the challan/investigation report by the police. Therefore, their testimony is not valued.
7.	In police encounter cases, where only the police officials were cited as witnesses, the non-provision of independent witnesses for the conduct of TIP was seen with doubts.
8.	Witnesses also committed various errors during TIP proceedings, with the most common one being that they identified the accused but without assigning any roles.
9.	It has now become a norm in reported case laws that courts have considered Joint TIPs neither acceptable nor reliable. Despite this, joint TIPs are being conducted, undermining the basic foundations of the trial.
10.	Where provisions of facial features and dress of accused persons are essential to gauge the memory of witnesses, the assignment of roles is also now considered essential to determine the veracity of witnesses during TIPs.
11.	The selection of dummies for TIP is an important aspect. Magistrates are bound to choose dummies that resemble the accused the most. They are also required to mention the facial features, along with height and weight, of the dummies to match them with those of the accused persons. In reports of TIP where magistrates did not provide these essential elements, the courts of law give no value to the TIP during trial proceedings.
12.	Not only are roles required to be provided in statements before investigating agencies by the witnesses, but the same roles are also required to be provided before the magistrates by the witnesses. In cases where magistrates forget to mention roles given by the witnesses during TIPs or where witnesses forget, the TIPs were not given value.
13.	The number of dummies is required to be specific—not more than necessary, nor less than essential. The courts of law have specified the proper numbers of dummies. In cases where magistrates fail to arrange the proper number of dummies for the conduct of TIP, the TIP loses its value. The ratio between the accused and the dummies is 1 to 9 or 10.
14.	In cases where the accused are unknown to the witnesses, the non-conduct of TIP proves fatal during trial for the complainants and prosecution. In such cases, TIP has been held to be essential.
15.	The investigation agency is bound to follow the directives provided in Rule 26.32 of Police Rules 1934 for the successful conduct of TIPs.
16.	The magistrates are bound to abide by the directives provided in Lahore High Court, Rules and Orders, Volume III, to give effect to and achieve fruitful results from the TIP during the trial.

17.	Where features of dummies are essential for the TIP reports, there non-mentioning of the features of the accused in TIP reports is also considered an irregularity that vitiates the trials.
18.	The provision of a list of all dummies who form part of the TIPs, along with their parentage, occupation, and addresses, is now regarded as an essential element of it. Where magistrates do not provide it, the TIPs lose their credibility.
19.	In cases where more than one witness is cited as an ocular account, there non-participation of all ocular witnesses in the TIP goes against its value.
20.	In cases where the accused are remanded to the police and thereafter a TIP is conducted, the courts give no value to it. The accused should preferably not be remanded to police custody in the first instance and should be kept in judicial custody until the identification proceedings are held.

### Discussion on Common Errors

**Table 3**  
**Fixing Responsibility**

<b>Errors</b>	<b>Percentage</b>
Police and Magistrate jointly	25.0 %
Police and Witnesses jointly	25.0 %
Police alone	20.0 %
Witnesses alone	5.0 %
Magistrates alone	25.0 %

The analysis of above founded errors in the TIPs discloses a significant distribution of responsibility among the involved parties. Among the total of 20 errors identified, the majority of errors are attributable to the investigation agency. They play a significant role in above referred case laws: it contributes to 45% (20% alone + 25% jointly with magistrates) of the errors. Witnesses are also responsible for failure of TIPs: their contributions are 30% (5% alone + 25% jointly with police). Magistrates themselves are also responsible for failure of TIPs: their participation is 25%. This breakdown emphasizes the necessity for collaborative efforts of all concerned parties in reducing errors in TIPs. There is a dire need of designing strategies within the TIP framework.

### Discussion on TIP

TIPs do not represent the proof, but rather the proof of the senses of the witness. It serves as a test of their power of observation; their ability to recognize unfamiliar persons, and their memory. These natural abilities may vary among people. That is why TIP is designed. A witness may be honest, but the question is whether his memory still could be imperfect (*Lal Pasand's case 1981*). Moreover, the memory of anyone, both conscious and unconscious, can distort one's perception. And if mistakes are possible in identifying someone known from before, then the likelihood of errors in identifying unfamiliar person is even larger (Verma, 2022). Therefore, proper TIP is *sin qua non* for effective CJS (Sithannan, 2014).

The importance of proper TIP in CJS has been established through efforts by courts for decades. The first landmark case, in this effort, was penned down by Justice Khalil-ur-Rehman Ramday. He precisely outlined the necessary steps, procedure, precautions, and guidelines in overall conduct of a meaningful TIP (*Muhammad Yaqoob & Another v. the State 1989*). His guidelines are helpful in ensuring the accurate identification and to ensure that TIP is reliable and provides valuable evidence for court's consideration. Following is the essence of his judgment.

1. The evidence provided through TIP does not hold substantive value on its own. It basically serves to support the testimony given by witnesses (*Muhammad Bashir v. the State PLD 1958*).
2. It cannot alone serve as a sufficient basis for fetching conviction. (*Amitsingh Bhikamsing Thakur v. State of Maharashtra 2007*).

3. It is only necessary when the offender was entirely unknown to the witnesses (*Ismail and another v. The State 1974*).
4. Its primary objective is to determine whether the offender was indeed the real offender (*King v. Christle 1914*).

### **Guidelines**

The case of Kanwar Anwaar Ali is considered the foremost recent precedent on TIPs. In this case, the court has thoroughly examined previous rulings on TIPs and it has synthesized the rules and procedures outlined in those cases. In essence, this case serves as a comprehensive reference which has for the time being consolidated the legal principles and guidelines on our subject (*Kanwar Anwar Ali's case 2019*).

Furthermore, there are also other cases that provide guidelines for the proper procedure of TIPs. After analyzing the aforementioned errors and reviewing 20 above referred cases which are resulted into acquittals due to errors committed during TIPs, whether by police, witnesses, or magistrates, the following guidelines and recommendations are suggested for all concerned parties. These guidelines aim to facilitate a better understanding of the TIP procedure. It also aims to prevent the recurrence of the above highlighted common errors.

1. A TIP lineup is essential solely in those cases where the perpetrator was entirely unfamiliar to the witnesses.
2. TIP must be conducted with the aim to ascertain whether the alleged offender was indeed the actual one or not.
3. If complainants have already nominated the accused in their statements to either the police or the magistrate, then TIP should not be conducted.
4. It is now imperative that witnesses must provide detailed descriptions of the facial features and attire of the accused in their statements to investigating agencies.
5. Additionally, all witnesses who partake in a TIP must be named in the police challan or investigation report.
6. In cases involving police encounters where only police officials serve as witnesses, independent witnesses must be provided for the TIP.
7. When the accused are unknown to the witnesses, TIPs must be conducted.
8. The investigation agency is required to adhere to the directives outlined in the Police Rules 1934 for the successful execution of TIPs.
9. In cases where multiple witnesses provide ocular accounts, all witnesses must participate in the TIPs.
10. Precautions which are intended to eradicate the risk of unjustified identifications must be implemented both before and during the course of TIP proceedings.
11. The primary objective of TIP must be to determine whether the witness still can identify the actual offender or not.
12. There should not be any unexplained and unreasonably extended period between the occurrence and the TIP.

13. For a TIP to instill confidence, it should be conducted as soon as feasibly possible following the incident.
14. All circumstances which are allowing the witness to see and identify the offenders before TIPs must be eliminated in advance.
15. It is imperative to ensure that, subsequent their arrest, the accused forthwith undergo TIPs at the earliest opportunity.
16. Legally, such persons should not be initially remanded to the police custody but should instead be held in judicial custody, unless and until the TIPs are conducted.
17. These lineups should never take place at the police stations.
18. The magistrate who are duty bound to oversee the TIPs must confirm the duration, if any, during which the accused are held in police custody, subsequent their arrest and before the TIP. This information should be a part of the magistrate's report.
19. The selection of dummies for the TIP is crucial. The magistrates are obligated to choose dummies resembling the accused as closely as possible. Facial features, height, and weight of the dummies should be mentioned to ensure accurate comparison of these dummies with the accused persons.
20. To prevent the risk of a witness inadvertently identifying an accused person, the quantity of the dummies i.e., persons mixed with the accused should be maximized.
21. On average, the proportion between the accused and the dummies should be 1 to 9 or 10. This ratio should be adhered to unless there were particular justified circumstances which necessitates departure from it.
22. If multiple persons were accused and required to undergo TIPs, then the standard prudential rule, which has been established by the higher courts, is that each accused person should have their own separate TIP.
23. It should be guaranteed by the magistrate and by the police that before a witness takes part in the TIP, he is positioned at such a place where he would not be able see the proceedings. After his turn, he should be placed where he would not be able even to exchange a few words with others whose turn is yet to come.
24. In a TIP, the witness is required to articulate the purported role played by the accused in the crime.
25. The magistrate had a duty to compile a roster of all dummies included in the TIP lineup; he must provide their details such as their lineage, profession, and residential addresses in his report.
26. The magistrate is also required to accurately document any objections or statements raised by either the accused side or by the witness's side before, during, or after the proceedings.
27. When a witness accurately identifies an accused, then the magistrate should inquire about the context in which he identifies. For instance, whether the witness knew the person as a friend, a foe, or a suspect in an offence. Thereafter, this information should be included in the magistrate's report.

28. When a witness makes an incorrect identification, then the magistrate should also document this in his report.
29. The magistrate also has the obligation on his shoulders to document in his report all the measures which he took, to ensure the fair conduct of the proceedings, before the TIP.
30. The magistrate is also mandated to issue a certificate, after following the guidelines provided in CH. II. of Vol. III of Lahore High Court Rules and Orders, at the conclusion of his report.
31. The magistrate who is supervising the TIPs must be active participants; he must engage all and not merely observe; he must always be mindful that the life and liberty of an individual rely solely on his vigilance and caution.

The guidelines mentioned above should not be viewed as the sole steps required to be taken before, during, and after the TIP. Although these requirements are obligatory, they should be regarded as essential and must be adhered to by all parties involved, including the police and the magistrates.

### **Conclusion**

It is generally accepted principle in CJS that when a witness recognizes the accused in court, it constitutes substantive evidence. However, such recognition during trial, for the first time, may often seem weak. Therefore, a TIP is designed to strengthen the reliability of the evidence. This TIP then serves to support the witness in the court, who are claiming to identify the accused, especially in those cases where previously unknown to them. TIP, therefore, remains within the domain of investigation (*Vaikuntam Chandrappa v. State of A.P. 1960*). It is also important to mention here that the Code of Criminal Procedure does not command the investigating agency to conduct a TIP in each case. Likewise, it also does not grant the accused the right to demand it. Therefore, the failure to conduct a TIP does not necessarily weaken the evidence in every case. That is why, the domain to give weight to such identification is bestowed to the court, and the court will base it on the specific circumstances of each case (*Malkhansingh and Ors. v. State of M.P. 2003*). In certain instances, the court even may accept the identification, in the court, even without requiring additional corroboration (*Budhsen v. State of U.P. 1970*).

Basically, it is not feasible or wise able to establish a fixed rule regarding the fixation of TIP for a conviction to be sustained. These determinations are part of the job of the trial courts. It is based on the specific circumstances of each case. If a rule is imposed for conducting a TIP, then it would only benefit professional criminals, who knows how to evade arrest by remaining unidentified to the victims. They would be able to exploit the prescribed rigid rules to avoid conviction. Hence, prudence commands that these decisions be left to the discretion of the trial courts. That court must carefully evaluate all aspects of the case, including the TIP (*Pramod Mandal v. State of Bihar 2004*).

The need for organizing a TIP rises only when the accused are not formerly recognized to the witnesses. The fundamental purpose of a TIP is for witnesses, who claim to have seen the criminals during the occasion, to identify them from an assembly of individuals without any support or instigation. This test aims to measure the trustworthiness of their remembrance. Principally, the primary objective of TIP during the investigative phase is to gauge the accuracy of the witnesses' recollections based on their initial imitations and to support the prosecution in deciding whether any of them could attend the court as the eyewitnesses. This is a test, and especially, there is no specific provision for them in the statutory law. That is why the courts have advised to conduct it as soon as possible after the arrest to prevent any possibility of the accused being seen by the



witnesses (*Mulla & another v. State of U.P 2010*). Furthermore, the courts have also affirmed that the absence of a TIP does not render the evidence inadmissible during the trial (*Kanta Prashad v. Delhi Administration 1958*). Nevertheless, the court retains the discretionary powers to determine the significance of such absence. However, it is advisable to go for TIP in circumstances where witnesses are unfamiliar with the accused prior to the incident (*Harbhajan Singh v. State of Jammu & Kashmir 1975*).

### **Recommendations**

On the basis of above referred research, analysis of the case laws, discussion, and guidelines, following are some recommendations for future actions:

#### **Training Programmes**

There is a dire requirement of development and implementation of an independent and joint training programmes for all parties involved in TIPs, including investigating agencies, and the magistrates. These programmes should focus on proper TIP procedures, legal guidelines, and best practices.

#### **Comprehensive Guide**

There is also a requirement to create a comprehensive guidebook containing best practices for conducting error-free TIPs. This guide should incorporate relevant rules, circulars, and case laws to provide a clear and practical framework to comprehend the objective, purpose and procedure for TIPs.

#### **Awareness Campaigns**

There is also a requirement to launch awareness campaigns to increase understanding and awareness of proper TIP procedures among stakeholders in the CJS. These campaigns could include seminars, workshops, and informational materials to disseminate knowledge about TIPs amongst investigation agencies, prosecution and judges.

#### **Regular Updates and Reviews**

Once framed, then the next requirement is to regularly update and review TIP procedures and guidelines to ensure they remain in line with evolving legal standards and best practices.

#### **Collaborative Efforts**

To achieve the above proposed objective, there is a requirement to foster collaboration between investigating agencies, magistrates, legal experts, and relevant stakeholders for the improvements in designing TIP procedures and to address common errors as above outlined.

#### **Evaluation and Feedback Mechanisms**

Another proposal is to establish an evaluation and feedback mechanisms to monitor the TIPs success ratios, its understanding among witnesses, police and magistrates. This feedback can guide for future improvements.

By implementation of the above referred recommendations, the capacity of stakeholders in the CJS can be enhanced to conduct TIPs effectively. The comprehension of common errors and efforts to avoid repeating them will contribute to its role in the fair and efficient administration of the CJS.

**References**

- Abdul Majeed Alias Cheeta v. the State 2022 YLR 587.
- Abid Ali v. the State 2022 PcrLJ 286.
- Amitsingh Bhikamsing Thakur v. State of Maharashtra 2007 (2) SCC 310.
- Anand, R. (2009). *Proof of the Identification Parade* (SSRN Scholarly Paper 1372353).  
<https://doi.org/10.2139/ssrn.1372353>
- Aneel Iqbal Alias Nomi v. the State 2021 PcrLJN 77.
- Anwar v. the State 2020 MLD 841.
- Atkinson, V. J. (1996). *Legal research via the Internet*. Delmar Thomson Learning.  
<https://dl.acm.org/doi/abs/10.5555/524591>
- Atta Muhammad v. the State 2023 MLD 1795.
- Budhsen v. State of U.P. (1970) 2 SCC 128.
- Elias, S. (2009). *Legal research: How to find & understand the law*. Nolo.
- Harbhajan Singh v. State of Jammu & Kashmir (1975) 4 SCC 480.
- Hervey, T., Cryer, R., Sokhi-Bulley, B., & Bohm, A. (2011). *Research methodologies in EU and international law*. Bloomsbury Publishing.
- Hutchinson, T. (2013). Doctrinal research: Researching the jury. In *Research methods in law* (pp. 15–41). Routledge.  
<https://www.taylorfrancis.com/chapters/edit/10.4324/9780203489352-7/doctrinal-research-researching-jury-terry-hutchinson>
- Inhaf Ullah v. the State 2021 SCMR 1725.
- Ismail and Another v. the State 1974 SCMR 175.
- Jamshaid Alias Bablu v. the State 2022 YLR 1822.
- Kanta Prashad v. Delhi Administration AIR 1958 SC 350.
- Kanwar Anwar Ali's Case PLD 2019 SC 488.
- King v. Christle 1914 AC 545.
- Kumar, A. (2023). *Test Identification Parade an Evaluation Through Judicial Pronouncements, its Utility and Veracity* (SSRN Scholarly Paper 4414175).  
<https://doi.org/10.2139/ssrn.4414175>
- Lal Pasand's Case PLD 1981 SC 142.
- Malkhansingh and Ors. v. State of M.P. (2003) 5 SCC 746.
- Mohammad Shoaib v. the State 2022 YLR 1837.
- Muhammad Atif v. the State 2022 PcrLJ 489.

- Muhammad Bashir v. the State PLD 1958 SC 1.
- Muhammad Ibraheem v. the State 2020 YLR 1662.
- Muhammad Ismail v. the State 2022 YLRN 193.
- Muhammad Saleem v. the State 2022 PcrLJ 1356.
- Muhammad Shaban Alias Shabani v. the State 2023 YLR 926.
- Muhammad Yaqoob & Another v. the State 1989 PcrLJ 2227.
- Muhibullah v. the State 2023 YLR 1094.
- Mulla & Another v. State of U.P AIR 2010 SC 942.
- Nasrullah v. the State 2020 YLR 644.
- Noor Islam v. Ghani Ur Rehman 2020 SCMR 310.
- Perera, E. M. N. (2021). *Identification Parades: The Evidentiary Value & the Credibility of the Witness in Identifying Suspects for Criminal Investigations in Sri Lanka*. 3(1), 41–49.
- Pramod Mandal v. State of Bihar (2004) 13 SCC 150.
- Rajamanickam\*, R., & Kung, K. B. (2018). *Identification Parade: Current Position And Issues In Malaysia*. 893–902. <https://doi.org/10.15405/epsbs.2018.07.02.94>
- Sahib Shah v. the State 2024 PcrLJ 396.
- Sithannan, V. (2014). *Police Investigation-Powers, Tactics and Techniques*. eBooks2go, Inc. <https://books.google.com/books?hl=en&lr=&id=3jfBAgAAQBAJ&oi=fnd&pg=PR35&dq=test+identification+parade+india&ots=kODP9JWZtM&sig=mbWCngoxs5WAX9pQuD-hUSzI xv8>
- State of H.P. v. Lekh Raj AIR 1999 SC 3916.
- Suresh Chandra Bahri v. State of Bihar, AIR 1994 SC 2420.
- Syed Ahmed Hussain Salman v. the State 2022 YLR 2276.
- Syed Aijaz Ali Shah Qadri v. the State 2023 YLR 780.
- Umair Ashraf v. the State 2023 YLR 2072.
- Vaikuntam Chandrappa v. State of A.P. AIR 1960 SC 1340.
- Verma, A. (2022). Test Identification Parade's Purpose And Evidentiary Value Under Indian Law. *Research Ambition: An International Multidisciplinary e-Journal*, 7(1), 1–2.