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ABOUT US



WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

INVESTIGATION AND ARREST PROCEDURES IN CRIMINAL CASES: A LEGAL PERSPECTIVE

AUTHORED BY - KISHORE CHANDURU K R¹

“Whatever thing in whatever form appears (reported), to discover its true nature is called the knowledge of reality.” (Thirukural)²

INTRODUCTION

In India, the first step towards criminal proceeding is an investigation by the police. The investigation is the exclusive domain of the police and cannot be curtailed in normal circumstances. The main purpose of an investigation is the identification of the offender so as to serve him with punishment for the crime done by him in accordance with the provisions contained under law. In criminal cases, the process of investigation is extremely thorough and involves a great deal of skill and caution. The law requires that the process of investigation should be carried on with great care and diligence as one wrong investigation would defeat the entire purpose of investigation which is the deliverance of justice to those who seek and also the discovery of the offender. Therefore, it is expected from the police that they leave no stone unturned while investigating a case.

CONCEPT OF INVESTIGATION

Investigation can be defined quite simply as a systematic fact finding and reporting process. It is derived from the Latin word vestigare, to “track or trace,” and encompasses a patient, step-by-step inquiry. Investigation is finding facts; it is akin to research conducted in the academic arena. Investigation is a multi-disciplined field of study³. It encompasses law, the sciences, communications, and a host of other things. Investigation requires an inquisitive mind coupled with an attention to detail. Investigation means to examine, study, or inquire into systematically, search or examine into the particulars of; examine in detail, or, to search out and examine the particulars of in an attempt to learn the facts about something hidden, unique, or complex, esp. in an attempt to find a motive, cause, it is about finding things.

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² <https://police.py.gov.in/Police%20manual/Chapter%20PDF/CHAPTER%2038%20Investigation.pdf> PAGE#1

³ <https://www.ifpo.org/wp-content/uploads/2013/08/intro.pdf>

“Investigation” includes all the proceedings under “the Code of Criminal Procedure, 1973” for the collection of evidence conducted by a Police officer or by any person (other than a Magistrate) who is authorized by a Magistrate. (Section 2(h) of the Criminal Procedure Code). The officer-in-charge of a Police Station can start investigation either on information or otherwise (section 157 Cr.P.C.).

The investigation consists of the following steps starting from the registration of the case:-

- (i) Registration of the case as reported by the complainant u/s 154 Cr.P.C.,
- (ii) Proceeding to the spot and observing the scene of crime
- (iii) Ascertainment of all the facts and circumstances relating to the case reported
- (iv) Discovery and arrest of the suspected offender(s)
- (v) Collection of evidence in the form of oral statements of witnesses (sections 161/162 Cr.P.C.), in the form of documents and seizure of material objects, articles and movable properties concerned in the reported crime
- (vi) Conduct of searches of places and seizure of properties, etc.
- (vii) Forwarding exhibits and getting reports or opinion from the scientific experts (section 293 Cr.P.C)
- (viii) Formation of the opinion as to whether on the materials collected, there is a case to place the accused before a magistrate for trial and if so, taking necessary steps for filing a charge sheet
- (ix) Submission of a Final Report to the court (section 173 Cr.P.C.) in the form of a CHARGE SHEET along with a list of documents and a Memo of Evidence against the accused person(s) or in the form of a REFERRED CHARGE SHEET or a report referring the case as UN, MF, ML, Civil nature and Action dropped, as the case may be, on the basis of the evidence collected during the course of the investigation.

The documentation for the Police investigation shall include the following papers namely :-

- (a) First Information Report (section 154 Cr.P.C.)
- (b) Crime details form
- (c) Arrest / court surrender memo
- (d) Property seizure memo and
- (e) Final Report Form (section 173 Cr.P.C.)

INVESTIGATION RELATED DUTIES AND JOBS

This would include police functions like

- a) crime registration
- b) guarding, protecting visit to the scene of crime
- c) lifting, handling and packing of exhibits and sending them to various places like the PS, SP office, FSL and other places calling witnesses and serving notices
- d) calling witnesses and serving notices to them
- e) arresting criminals and suspects
- f) search and seizure proceedings during an investigation
- g) interrogation of suspects, witnesses and criminals
- h) collection and recording of various types of evidences i.e. oral, documentary and expert opinion etc.
- i) taking criminals to courts for police/judicial custody and trial
- j) raids for various purposes.

POWER OF POLICE TO INVESTIGATE COGNIZABLE CASES

Any officer-in-charge of a Police Station may, without the order of a magistrate, investigate any cognizable case which a court having jurisdiction over the local area within the limits of such station would have power to inquire into or try under the provisions of the Criminal Procedure Code, 1973.

After registration of the offence and sending FIR, the police officer has to proceed in person or he shall depute one of his subordinate officers to proceed to the spot for investigation and also for taking measures for discovery and arrest of the offender (section 157 Cr.P.C.). In case the offence is not of a serious nature, the police officer need not proceed in person or depute a subordinate officer to make investigation on the spot. (Section 157 Proviso (a) Cr.P.C.). If it appears to the police officer that there is no sufficient ground for entering on investigation, the police officer need not investigate such a case (Section 157 Proviso (b) Cr.P.C.). Where the police officer does not investigate the case as no sufficient ground for investigation is found, then the police officer shall prepare case diary and send final report.

Even after submitting final report under section 173 (2) Cr.P.C., the police officer is not precluded from collecting further evidence and is empowered to obtain the case file from the

court for further investigation. In case the police officer finds any relevant oral or documentary evidence even after filing charge sheet, the police officer has to forward the same to the Magistrate by way of further report, which is generally termed as additional information or additional charge sheet under section 173 (8) Cr.P.C.

Search and Production of Documents

If the Police believes that some search has to be made during investigation, he is authorized to do so for cognizable offence. He can also issue or order a person to produce any documents that are relevant for the case.

Arrest

Arrest refers to a physical restraint put on a person as a result of accusation made against him for an offence that is cognizable in nature. Three elements are present for the arrest of a person:

1. Intention to arrest under authority;
2. Detention in legal manner; and
3. Arrested person understands why he is arrested and knows his rights.

Arrest in cognizable offences does not require a warrant. It can be done on the making of accusation that is so dangerous or serious in nature that it cannot be avoided. Within 24 hours of the arrest, the Police has to acquire an arrest warrant for the person in custody. Within 24 hours, the Police has all the time to investigate the offence and question the person.

Remand

When Police arrests a person in case if cognizable offence and investigation cannot be completed within 24 hours, then they make a written application to the magistrate and request him to keep the accused in police custody for further period otherwise the accused has to be released. The request of remand can be granted for not more than 14 days under the police custody.

Statement of Witnesses

During the investigation, the persons who are included in the case basically the witnesses, as well as the accused, are questioned and their statements of their side of the event are recorded.

Medical Examination

In case of rape and molestation or any such crime where medical examination is necessary,

it's the duty of the police officer to get it conducted within 24 hours of the offence being reported.

Chargesheet

When a Police officer concludes an investigation of a cognizable offence, he sends a report to the magistrate of that investigation in which the I.O. finds the material to proceed against the accused. This report includes F.I.R., statements of witnesses recorded by police, names of parties, brief facts and information gathered by the I.O. during investigation etc⁴. This is how the investigation conducted by police officer will conclude.

GROUND ON WHICH INVESTIGATION CAN BE REFUSED

The following principles are laid down to guide the exercise of their discretion by Police Officers in the matter of refusing investigation under section 157 (1) (b) of the Criminal Procedure Code.

The investigation may be properly refused in the following cases:-

(a). Triviality:-

Trivial offences, such as are contemplated in section 95 of the Indian Penal Code. "Nothing is an offence by reason that it causes or that is intended to cause, or that it is known to be likely to cause any harm, if that harm is so slight that no person of ordinary sense and temper would complain of such harm".

(b). Civil Nature:-

Cases clearly of civil nature or in which complainant is obviously endeavouring to set the criminal law in motion to support a civil right.

(c). Petty thefts:-

Cases of petty theft of property less than Rs. 10/- in value, provided that the accused person is not an old offender, nor a professional criminal, and that the property does not consist of sheep or goats.

(d). Injured person not wishing an inquiry:-

Unimportant cases in which the person, injured does not wish inquiry, unless

- the crime is suspected to be the work of a professional or habitual offender or
- a rowdy element or

⁴ <https://blog.ipleaders.in/cognizable-offences-under-code-of-criminal-procedure/>

➤ the investigation appears desirable in the interests of the Public.

(e) Undetectable simple cases:-

Simple cases of house-breaking or house trespass and petty thefts of unidentifiable property, is none of which cases is there any clue to work upon or any practical chance of detection, provided that there is nothing to indicate that the offence has been committed by a professional criminal.

(d) Exaggerated assaults:-

Assault in cases which have been obviously exaggerated by the addition of the other charges such as theft.

IMPARTIAL INVESTIGATION

Investigating officers are warned against prematurely committing themselves to any view of the facts for, or against a person. The aim of the investigating officer should be to find out the truth and to achieve this purpose, it is necessary to preserve an open mind throughout the Inquiry.

FINAL DISPOSAL & COMPLETION OF INVESTIGATION⁵

Section 173 CrPC lays down that every investigation by police made under Chapter XII Cr.P.C. shall be completed without unnecessary delay. All investigations must be completed within the time limit provided under section 468 CrPC. No court will take cognizance of an offence after the expiry of that period.

The period of limitation is as follows:

- Six months if the offence is punishable with fine only
- One year, if the offence is punishable with imprisonment for a term not-exceeding one year
- Three years, if the offence is punishable with imprisonment not exceeding three years
- The prosecution will have to explain the reasons for the delay if the charge sheet is filed after the expiry of the period of limitation. The Court has to be satisfied with reasons adduced for delay.

Sections 469 to 472 CrPC deal with the commencement of limitation, exclusion of time in certain cases etc.

⁵ <https://bprd.nic.in/WriteReadData/userfiles/file/6798203243-Volume%202.pdf> pg# 125 - 126

As per section 167(5) CrPC, when the police officer arrests a person in a summons case and if the investigation is not completed within 6 months and whether the person is on bail or in custody, the magistrate is competent to order the closure of the investigation and on such order further investigation is not allowed unless ordered by the session court. Therefore in such cases, it must be ensured that the investigation is completed within that period.

Section 167(2)(a) CrPC empowers the Court to order release of the accused in custody if the charge sheet is not filed within 60 days or 90 days as the case may be. Hence, the IO should complete the investigation in the above cases within the time prescribed. If the investigation could not be completed within the said period of 60 or 90 days the accused will be entitled for bail. Care must be taken to speed up investigation in such cases if the accused is to be continued in remand. However, incomplete charge sheet shall not be filed for the sake of keeping the accused in remand.

Sections 173(8) Cr.P.C. provides for a supplementary or additional charge sheet. This provision is not a substitute for original charge sheet. This provision is meant for filing a subsequent charge sheet only when there is fresh and further evidence about the offence or offender, which is not known at the time of filing the first charge sheet.

A CASE STUDY OF POLICE INVESTIGATIONS

MUKESH AND ANR VS STATE (NCT DELHI)⁶ - Nirbhaya Case

The murder and rape incident of the 2012 Delhi gang-involved a rape and violent attack that happened on **16 December 2012**. The incident occurred when a 23-year-old female was assaulted, gang-raped, and brutalised in a private bus that the girl and her male friend had boarded. The Delhi Police nabbed all six accused in the Nirbhaya case within five days of the crime.

FORMATION OF SPECIAL INVESTIGATION TEAM

The best minds of Delhi Police were brought together in the special investigation team (SIT). Veteran investigators like PS Kushwaha and Rajender Singh and extremely supportive supervisors Dharmendra Kumar and Chhaya Sharma worked day and night under the then police commissioner Neeraj Kumar to make a case that made acquittal an impossible task. Firstly, the

⁶ (2017) 6 SCC 1

SIT used Nirbhaya's hand movements and gestures as dying declaration to identification of culprits and forensic odontology (using teeth/bite mark) to prove culpability. In the absence of any worthwhile clues, DCP Chhaya Sharma knew that if the case was to be cracked, locating the bus was critical. All that was known from Awindra's (male victim) account, besides its colour and the stripes painted on its sides, was that it had a separate driver's cabin, red seat covers and yellow curtains, and that the hubcap of the front left wheel was missing. She summoned the ten best inspectors of the south district to the Vasant Vihar police station with their respective teams. Inspector Rajender Singh of the Special Staff—an experienced and versatile officer—was the star investigator amongst them. DCP Chhaya allocated specific jobs to each inspector and made the police station her mission control room. None of them went home for five days and nights, not until the last accused had been arrested.

SEARCH FOR BUS

One team left for the Delhi Transport Department to get details of all white buses registered with them. The police had the details of 320 white buse. Inspector Rajender Singh and two other teams scoured the CCTV footage from all hotels and guest houses on the national highway opposite the crime scene. Interestingly, the police teams noticed a white bus with 'Yadav' painted on its side in the CCTV footage of Hotel Delhi Airport. The bus was seen coming from Delhi, seemingly heading for Gurugram, but within nineteen minutes, at 9.53 p.m., it reappeared on the screen, heading again in the same direction. The obvious conclusion was that it had taken a U-turn from under the flyover located close by, proceeded towards Delhi instead of going towards Gurugram, and had again turned around to drive towards Gurugram. The CCTV footage of the white bus was shown to Awindra, who confirmed that it indeed looked like the bus he had boarded. He looked intently at the front left wheel, and sure enough, it did not have a hubcap. The search for the white bus had now zeroed in on those that had Yadav written on their side.

ENQUIRY OF TRANSPORTERS

The teams began to question the transporters if they knew anyone who owned buses with Yadav written on their vehicles. The name of one Dinesh Yadav of Noida, a city in Uttar Pradesh, came up. He owned a fleet of buses, most of which had his surname written on them. When questioned, Dinesh confirmed that he did indeed own a bus that had red seat covers, yellow curtains and Yadav written on its side. The bus, as disclosed by him, was on charter with Birla

Niketan School in Saket. He further disclosed that the driver was named Ram Singh and lived in one of the shanties of Guru Ravi Das Camp, a slum abutting Sector 3 of R.K. Puram in south Delhi. The driver usually parked the bus in the vicinity of his abode.

RAM SINGH ARREST - 17TH DECEMBER 2012

By then it was 11 a.m. on 17 December, the day following the crime. A police team rushed to Guru Ravi Das Camp and saw the bus parked there... On inquiring where the bus's driver resided, the jhuggi was found and Ram Singh (aged thirty) was nabbed. He took the police team to the bus, which was inspected in the presence of witnesses. It had been washed from the inside and every effort made to obliterate all traces of evidence. A forensic team was called, which recovered two bloodstained iron rods, a debit card in the name of Asha Devi (Nirbhaya's mother), traces of blood, hair and spit from inside the bus. A T-shirt and a pair of bloodstained brown slippers were also seized. Initially he denied his involvement and blamed his brother Mukesh. It was only at 4 p.m. on 17 December—the day after the crime—that Ram Singh (aged thirty-four) accepted his involvement and gave a graphic account of the sequence of events. The details given by him matched Awindra's statement. He was placed under arrest.

MUKESH SINGH, PAWAN GUPTA, VINAY SHARMA ARREST – 17TH DECEMBER 2012

On the evening of 17 December SI Arvind Kumar of the Special Task Force of the south district left with a police team of six for Karoli in Rajasthan, 300 kilometres away from Delhi. His mission was to nab Mukesh, Ram Singh's younger brother. The police team drove all night and reached Karoli in the wee hours of the following day. The village was 2 kilometres away from the nearest road, and the approach to it was not motorable. The police party had to cover the distance on foot. The hut in which Ram Singh and Mukesh's parents lived was not in the main village but in the middle of an agricultural field, a little distance away. What stood between the police team and the hut was a river with neither a bridge across it nor any ferry service. The police team realized that they would have to swim across it. One member of the team, a consummate swimmer, was sent in advance to check how deep the river was. Luckily, it was crossable, but there was one difficulty—the AK rifles and pistols the policemen were carrying would have to be protected from being submerged in water. Undeterred, the policemen stepped into the icy waters of the river with their weapons raised above their heads. A few of them were not tall enough to keep their heads above water and had to walk on their toes. Mukesh, who

had been hiding out with his parents, was caught and arrested. Vinay Sharma, a gym assistant and fitness trainer in Ravi Dass Slum and Pawan Gupta, a fruit seller of the same area was arrested by the police.

AKSHAY THAKUR ARREST - 21ST DECEMBER 2012

From the accused Ram Singh the role of Akshay Kumar Singh aka Thakur had come to light. He shared the number with the police; it was registered with a service provider in Aurangabad, Bihar. A team under Inspector Rituraj was dispatched by air to Patna on 18 December. On 19 December, the Delhi Police team established contact with the staff of the police station in Tandwa, in whose jurisdiction Akshay's village was located. They planned to trace Akshay's village stealthily so as not to alarm its residents. On 21 December, Akshay was spotted by a chowkidar getting off from a train at Tandwa railway station and then walking towards his village. The chowkidar lost no time in informing Inspector Rituraj, who rushed with his team and arrested Akshay by noon on 21 December.

ARREST OF THE JUVENILE - 21ST DECEMBER 2012

Raju, the juvenile in conflict with the law, was the only accused left to be arrested. Ram Singh had disclosed that Raju had stayed with him on the night of 15 December and he lived in trans-Yamuna area. The police did not know Raju's real name, his cellphone number or his address. None of the other accused knew anything about him. In the absence of any specific clues, the police went to the trans-Yamuna area, which has a population of 50 lakh in a 50 square kilometre area. It was much like looking for the proverbial needle in a haystack. Police teams fanned out in the area and started asking for a boy named Raju at various bus depots located in east Delhi. The persons who claimed that they had met Raju were requested to be part of the search teams to identify the boy. The search for Raju continued for three days and nights. Finally, a local resident, who had joined the police search for Raju, spotted a youngster who he thought was Raju in a bus plying between the Anand Vihar bus terminal and Noida. The search then zeroed in on buses plying that route. On the morning of 21st December, the spotter identified Raju on a bus returning to Anand Vihar from Noida. As soon as this information was relayed to the police, a team rushed to the Anand Vihar bus station and nabbed the juvenile. By these Investigation process, all the accused were arrested by Police within 5 days.

CONCLUSION

The investigation and arrest procedures play a critical role in ensuring justice while maintaining the integrity of the legal system. These cases test the effectiveness of law enforcement, requiring a delicate balance between swift action and adherence to legal safeguards. Investigators must navigate public pressure, media scrutiny, and legal challenges while upholding the rights of the accused and the principles of due process. The proper execution of these procedures is essential not only for securing convictions but also for maintaining public trust in the justice system. Ultimately, high-profile cases can act as catalysts for legal reforms, emphasizing the need for transparency, efficiency, and accountability in criminal investigations.

SUGGESTIONS

The following are the suggestions for efficient and effective Investigation Process by Police.

- Investigation Software is a digital tool that helps investigators track and manage their investigations. It needs to be installed in each and every police stations.
- Investigations needs to be fair and unbiased
- Each State must have its own Specialized Investigation Units within the police force that are responsible for crime investigation
- These Specialized Investigation Units should not be diverted for other duties.
- Required Skills and Training and adequate forensic techniques and labs is a need of the hour to have efficient Investigators.

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