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From Prima Facie to Proof Beyond Reasonable Doubt: Mapping the Three Tiers of Evidence

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Abstract

Evidentiary assessment lies at the heart of criminal justice, yet is often applied without a clear and structured understanding of its different levels. This article explains that criminal proceedings operate through three distinct tiers of evidence: prima facie evidence at the initial stage, a stronger and more cogent level of evidence at intermediate stage, and proof beyond reasonable doubt at the stage of final judgment. Each tier requires a different degree of judicial satisfaction and serves a specific purpose in the progression of a criminal case.

The study highlights the importance of maintaining clear distinctions between these thresholds to ensure fairness, protect the rights of the accused, and prevent wrongful conviction or unnecessary prosecutions. However, it identifies significant shortcomings in judicial practice, where courts sometimes confuse or overlap these standards, leading to inconsistent decisions.

The article further points out that a limited conceptual understanding of these evidentiary tiers among judges, prosecutors, and legal practitioners contributes to this problem. By presenting a simple and structured framework, the article aims to promote clarity, improve legal reasoning, and encourage more consistent and principled application of evidentiary standards in criminal adjudication.

Keywords: *Prima Facie Evidence; Burden of Proof; Reasonable Doubt; Criminal Adjudication; Evidentiary Threshold; Judicial Satisfaction; Due Process; Presumption of Innocence; Criminal Procedure; Proof and Evidence; Legal Doctrine; Trial Process; Judicial Discretion; Fair Trial*

1. Introduction

The administration of criminal justice is fundamentally anchored in the evaluation of evidence, yet such evaluation is neither uniform nor static. At different stages of criminal proceedings, courts applying varying evidentiary threshold, each reflecting a distinct level of judicial satisfaction. These thresholds ranging from mere suspicion to prima facie assessment and ultimately to proof beyond reasonable doubt, serve as essential safeguards in balancing the power of the State with the rights of the accused. Their conceptual importance lies in ensuring that criminal process does not proceed arbitrarily, and that decisions at each stage are proportionate to quality and strength of available evidence. Thus, evidentiary threshold operates as a structured filter within the criminal process, guiding the transition from accusation to adjudication.

Despite their central role, the judicial application of these standards often suffers from inconsistency and ambiguity. Courts at times conflate suspicion with prima facie evidence, or apply standards approaching proof beyond reasonable doubt at preliminary stages such as bail or charge framing. This lack of clarity undermines procedural fairness and leads to divergent outcomes in similar cases. The distinction between suspicion (a tentative inference), prima facie case (sufficient ground to proceed), and proof beyond reasonable doubt (a high degree certainty required for conviction) is therefore critical, yet insufficiently articulated in practice. The decision in *Muhammad Kaleem v State of U.P.* (Supreme Court of India) 2026 INSC 251 is important for clarifying three-tier standards, for evidence. *Justice Sanjay Karol & Justice Augustine George Masih* underscore this progression by emphasizing that different stages of criminal proceedings demand different levels of evidentiary satisfaction, the that courts must remain conscious of this distinction while exercising their jurisdiction.

This article seeks to construct a coherent three-tier framework of evidentiary assessment in criminal law by systematically analyzing these thresholds and their application across procedural stages. Adopting a doctrinal and comparative methodology grounded in case laws, the study maps the progression from prima facie evaluation at the initiation stage, to a more cogent and stronger evidentiary standard at intermediate stages, and finally to proof beyond reasonable doubt at trial. The central thesis advanced is that criminal adjudication inherently operates through a structured yet under-theorized progression of evidentiary thresholds, and that a clearer recognition of this framework is essential for consistency, fairness, and the integrity of the criminal justice system.

2. Conceptual Foundation of Evidentiary Assessment

2.1 Meaning and Function of "Evidence" in Criminal Law

Evidence in criminal law constitutes the foundation material upon which judicial fact-finding rests, encompassing oral testimony, documentary proof, and material objects admissible under the Qanun-e-Shahadat Order, 1984. Its primary function is to assist the court in reconstructing past events and determining the truth of allegation through legally regulated means. The relationship between evidence, proof, and judicial satisfaction is neither mechanical nor linear; rather, the evidence serves as the raw input, proof emerges when such evidence attains a legally prescribed conclusion of the court. Pakistani jurisprudence consistently emphasizes that "proof" is not synonymous with certainty but with persuasion within legal standards, as observed in *Tariq Pervez v. State* (1995 SCMR 1345)[1], where

Supreme Court of Pakistan held that conviction must rest on evidence that exclude reasonable doubt, thereby illustrating the transformation of evidence into proof through evaluative judicial reasoning.

2.2 Standard v. Burden of Proof

A critical conceptual distinction exists between standard of proof and burden of proof, both of which operate simultaneously yet perform different functions in criminal adjudication. The legal or persuasive burden refers to the obligation to ultimately establish guilt, which, in criminal cases, lies upon the prosecution throughout, whereas the evidentiary burden shifts dynamically between parties as the trial progresses. This distinction is statutorily recognized in Articles 117-122 of the Qanun-e-Shahadat Order, 1984, which regulate the allocation of onus probandi. Standard of proof, by contrast, define the degree of persuasion required at different procedural stages, ranging from prima facie satisfaction to proof beyond reasonable doubt. The Supreme Court of Pakistan in *Muhammad Nawaz v. State* (2016 SCMR 267)[2] reaffirmed that while the burden remains constant, the evidentiary threshold varies, thereby underscoring the fluid and stage specific nature of evidentiary assessment in criminal proceedings.

2.3 Judicial Discretion and Evidentiary Evaluation

Judicial discretion plays a central role in evaluating evidence, particularly in determining whether a given evidentiary threshold has been met at different stages of the criminal process. However, such discretion is not unfettered. The risk inherent in this discretion lies in its potential subjectively, which may lead to inconsistent or arbitrary outcomes if not guided by structured doctrinal benchmarks. In *Muhammad Mansha v. State* (2018 SCMR 772)[3], the Supreme Court of Pakistan cautioned against speculative appreciation of evidence and emphasized that judicial satisfaction must be grounded in objective assessment rather than conjecture. This highlights the pressing need for coherent doctrinal framework, such as a tiered evidentiary model to discipline judicial discretion and ensure consistency, transparency, and fairness in criminal adjudication.

3. First Tier: Prima Facie Evidence (Initial Threshold)

3.1 Definition and Legal Meaning

Prima facie represents the lowest evidentiary threshold in criminal proceedings, denoting that it is sufficient to justify further inquiry but not to establish guilt conclusively. The expression “prima facie” literally means at first sight,” implying that the court, without undertaking a detailed evaluation of credibility or contradictions, finds sufficient grounds to proceed. The Supreme court of Pakistan in *State v. Muhammad Ashraf* (PLD 2005 SC 702)[4] clarified that at the stage, the court is not required to conduct a meticulous examination of evidence but only to ascertain whether allegations, if taken at face value, disclose the commission of an offence. Thus, prima facie satisfaction operates as a procedural gateway rather than a determinative finding of guilt.

3.2 Application in Criminal Process

The prima facie standard permeates multiple stages of the criminal process, including the registration of FIR under section 154 Cr.P.C., taking cognizance by a magistrate, issuance of process, and framing of charge under section 227-228 Cr.P.C. At each of these stages, the court or investigating authority assesses whether the available material discloses sufficient grounds to proceed further. In *Hidayatullah v. State* (PLD 1972 SC 677)[5], the Supreme Court of Pakistan held that at the stage of framing charge, the court must evaluate whether there exists a prima facie case, not whether the evidence is

sufficient for conviction. This reinforce the principle that early-stage decisions are provisional and do not entail a definitive adjudication of guilt.

3.3 Judicial Standards and Case Law

Judicial articulation of the prima facie standard in Pakistan reflects a consistent reluctance to equate it with proof or even strong suspicion. In *Muhammad Akram v. State* (2009 SCMR 2030)[6], the Supreme Court of Pakistan emphasized that even a single circumstance creating reasonable suspicion may suffice to proceed, provided it is not inherently improbable. Similarly, Indian jurisprudence under *State of Bihar v. Ramesh Singh* (AIR 1977 SC 2018)[7], frequently relied upon in Pakistani courts, clarifies that the standard at the stage of charge is one of "strong suspicion," though still short of proof. These authorities collectively demonstrate that prima facie assessment is intentionally permissive, designed to prevent premature termination of potentially valid prosecution.

3.4 Risk and Misapplication

Despite its limited scope, the prima facie standard is often misapplied by court, either by treating it as equivalent to proof or by applying it mechanically without due regard to the quality of evidence. Such confusion undermines the integrity of the criminal process, particularly in cases involving false or motivated allegations. The Supreme Court of Pakistan in *Khalid Javed Khan v. State* (2016 SCMR 1618)[8] warned against the uncritical acceptance of prosecution narratives at preliminary stages, emphasizing that even prima facie satisfaction must be based on credible material. The risk of abuse is especially pronounced in politically motivated or mala fide prosecution, where the low threshold may be exploited to subject individual to unwarranted criminal proceedings.

4. Second Tier: Cogent Evidence (Intermediate Threshold)

4.1 Nature of the Intermediate Standard

The intermediate evidentiary threshold variously described as "cogent," "strong," or sufficient evidence, occupies a critical position between prima facie satisfaction and proof beyond reasonable doubt. It requires a higher degree of evidentiary coherence and reliability than mere suspicion, yet falls short of the certainty required for conviction. This standard is not expressly codified in Pakistan statutory law but has evolved through judicial interpretation to address procedural context where stronger justification is required for advancing the prosecution. The Supreme Court of India in *Hardeep Singh v. State of Punjab* (2014) 3 SCC 92[9] articulated this threshold in the context of summoning additional accused, holding that the evidence must be "more than prima facie" and indicative of involvement, thereby conceptualizing an intermediate evidentiary standard.

4.2 Judicial Context of Application

This intermediate threshold is most prominently applied in situation such as summoning additional accused, alteration of charge, and adjudication of bail applications. In Pakistan, although no direct equivalent to Section 319 Cr.P.C. exists, courts implicitly employ a higher evidentiary threshold when exercising analogous powers, particularly in revisional or inherent jurisdiction. In bail jurisprudence, for instance, the Supreme Court of Pakistan in *Tariq Bashir v. State* (PLD 1995 SC 34)[10] recognized that the assessment involves determining whether there exist reasonable grounds for believing in guilt, which inherently requires evaluation beyond a mere prima facie view. Thus, the intermediate standard functions as a judicial tool for filtering cases requiring deeper scrutiny.

4.3 Doctrinal Ambiguity

A significant challenge associated with the intermediate evidentiary tier is its doctrinal ambiguity, as neither statutory law nor consistent judicial formulation provides a precise definition. Courts often resort to interchangeable expression such as "strong suspicion," "sufficient material," or leading to conceptual inconsistency. The Supreme Court of India in *Hardeep Singh v. State of Punjab*[9] attempted to clarify this ambiguity by distinguishing between mere suspicion and evidence capable of indicating involvement, yet the absence of a uniform standard persists. This lack of clarity creates inconsistency in application and risks inconsistent judicial outcomes across similar factual scenarios.

4.4 Functional Importance

Despite its ambiguity, the intermediate evidentiary standard performs an essential filtering function within the criminal justice system. It prevents premature conclusions base on weak or speculative material while ensuring that potentially culpable individuals are not excluded from the scope of prosecution due to overly rigid thresholds. By requiring a more substantial evidentiary basis than prima facie satisfaction, it safeguards against arbitrary or vexatious proceedings, while simultaneously preserving prosecutorial flexibility to adapt as evidence evolves. In this sense, the intermediate tier serves as a doctrinal bridge between suspicion and proof, reinforcing both fairness and efficiency in criminal adjudication.

5. Third Tier: Proof Beyond Reasonable Doubt (Final threshold)

5.1 Meaning and Scope

Proof beyond reasonable doubt represents the highest evidentiary threshold in criminal law, requiring prosecution to establish the accused's guilt to a degree that leaves no reasonable uncertainty in the mind of a rational adjudicator. This standard balances moral certainty with practical limitations; it does not require absolute or metaphysical certainty but demands a level of persuasion sufficient to justify depriving an individual of liberty. The Supreme court of Pakistan in *Tariq Pervez v. State* (1995 SCMR 1345)[11]emphasized that the threshold is one moral certainty, guiding the court to distinguish between reasonable doubt and fanciful or imaginary doubt. Similarly, *Muhammad Ashraf v. State* (PLD 2005 SC 702)[12] underscored that proof must be considered in the aggregate, taking into account corroboration, consistency, and context rather than isolated pieces of evidence.

5.2 Judicial Interpretation

Courts consistently link this standard with the presumption of innocence and the benefit of doubt. In *Muhammad Arif v. State* (PLD 2001 SC 1280)[13] the Supreme Court of Pakistan clarified that the prosecution bears the burden of dispelling all reasonable doubt and that unresolved doubt must favor the accused. Indian jurisprudence, in *Kamal Singh v. State of Rajasthan* (AIR 1977 SC 1700)[14], similarly articulated that *"beyond reasonable doubt"* does not require eliminating every uncertainty but sufficient persuasion to satisfy moral certainty. Pakistan courts have reiterated this in bail and appellate contexts, emphasizing that even cogent evidence at earlier stages cannot substitute for the final threshold at trial.

5.3 application at Trial Stage

At trial, proof beyond reasonable doubt necessitates comprehensive assessment of all prosecution evidence, including testimonies, documents, expert's reports, and circumstantial evidence. Cross examination and rebuttal play pivotal roles in testing credibility, consistency, and reliability. In

Rashid Ahmad v. State (PLD 2007 SC 456)[15], the Supreme Court of Pakistan held that conviction cannot rest on isolated to achieve moral certainty. Procedural safeguards such as witness confrontation, right to legal representation, and impartial evaluation are central to ensuring that the highest evidentiary standard serves its protective function.

5.4 Misconception and Challenges

Misinterpretation of this standard remains a persistent challenge. Equating "Beyond reasonable doubt" with absolute certainty risks setting unattainable benchmarks, whereas underestimation can facilitate wrongful conviction. Cultural, regional, and judicial factors may influence application, leading to inconsistency. In *Ghulam Abbas v. State* (2012 SCMR 1457)[16], the Supreme Court of Pakistan warned against overextension of doubt, emphasizing that courts must balance skeptism with fairness, taking into account both direct and circumstantial evidence.

6. The Continuum of Evidentiary Threshold

6.1 From Suspicion to Certainty

The three-tier model presents a logical progression from preliminary suspicion to moral certainty. Prima facie evidence initiates procedural steps, intermediate or cogent evidence filters cases requiring more scrutiny, and proof beyond reasonable doubt finalizes adjudication. This continuum reflects the hierarchical and functional nature of criminal evidentiary assessment, ensuring proportionate intervention at each stage. The Supreme Court of Pakistan in *Muhammad Akram v. State* (2009 SCMR 230)[17]highlight the necessity of such gradation to prevent both premature prosecutions and unjust acquittal.

6.2 Interrelationship Between Tiers

Each tier function as a procedural and substantive filter, escalating judicial satisfaction as evidence strengthens. Prima facie assessment allows procedural initiation, the intermediate tier informs prosecutorial strategy and judicial directions, and proof beyond reasonable doubt ensures legitimate conviction. Misapplication at any level can compromise the integrity of subsequent stages, emphasizing the need for coherent doctrinal guidance. Courts such as in *Khalid Javed v. State* (2016 SCMR 1618)[18] have stressed that conflating thresholds undermines fair trial rights and leads to inconsistency in judicial outcomes.

6.3 Visualizing the Three-Tier Model

The model can be represented as a pyramid or continuum:

1. BASE: Prima facie evidence-initial procedural gateway
2. Middle: cogent evidence- intermediate filtering for summoning, bail, or charge refinement
3. Apex: Proof beyond reasonable doubt-final adjudication at trial

This visualization underscores hierarchal structure, progressive intensification of judicial scrutiny, and systematic escalation of evidentiary requirements.

7. Comparative Doctrinal Insights

7.1 Common Law Jurisdiction

UK, India, and other common law systems recognize analogous structures, though articulation and statutory codification differ. In England, the standard for trial initiation mirrors prima facie evaluation, while strong suspicion guides intermediate procedures such as summons or bail. India

explicitly codifies intermediate powers under section 319 Cr.P.C., enabling courts to summon additional accused based on cogent evidence[19], thereby bridging gaps between prima facie case and final conviction.

7.2 Convergence and Divergence

While common law jurisdictions converge on graduated assessment, divergence exists in statutory recognition, procedural application, and clarity of intermediate thresholds. Pakistani courts, in contrast, largely rely on judicial discretion and precedents, creating interpretive variability and occasional doctrine ambiguity, comparative study shows that formal recognition of intermediate threshold can enhance both predictability and fairness in criminal adjudication[20].

7.3 Lesson for doctrinal Clarity

Comparative jurisprudence underscores the need for explicit statutory recognition or structured judicial guidelines for intermediate evidentiary thresholds. Clear articulation of three-tier models would reduce misapplication, strengthen due process, and harmonize Pakistan's criminal justice system with established comparative standards. Emphasizing procedural and substantive criteria for each tier can guide judges in applying graduated assessment consistently and fairly[21].

8. Challenges in Pakistan Criminal Jurisprudence

8.1 Absence of structured Doctrine

Despite judicial acknowledgement of evidentiary gradations, Pakistan lacks codified recognition of the three-tier model. The doctrinal vacuum forces courts to rely on interpretive analogies, resulting in inconsistent application and conceptual confusion between prima facie, cogent, and proof-beyond-reasonable doubt threshold[22].

8.2 Inconsistent Judicial Application

Blurring of threshold occurs in charge framing, summoning additional accused, and bail decisions. Some branches treat prima facie evidence as sufficient for summoning, while others apply a more religious intermediate assessment. This inconsistency undermines predictability and fairness, highlighting the need for structured guidance[23].

8.3 Impact on Fair Trial and Due Process

Lack of structured doctrine and inconsistent application poses risks to fair trial rights. Weak safeguards may permit wrongful prosecutions, while over-stringent interpretation can result in unwarranted acquittals. A legislatively or doctrinally codified three-tier model would harmonize judicial practice, minimize arbitrariness, and protect due process[24].

9. Towards a Coherent Doctrine of Evidentiary Threshold

9.1 Need for doctrinal Recognition

The absence of an explicitly codified three-tier evidentiary framework in Pakistan leaves courts dependent on judicial discretion and piecemeal precedents, generating interpretive inconsistency[25]. Unlike India, where section 319 Cr.P.C. empowers courts to summon additional accused if found connected on the basis of cogent evidence. Pakistan lacks statutory recognition of an intermediate evidentiary tier[26]. The doctrinal gap leads to two primary risks: first, premature or improper summoning of individuals based on mere suspicion; second, the potential failure to act against culpable parties when evidence meets the intermediate threshold but is insufficient for immediate conviction[27]. Formal

acknowledgement of the three-tier model would provide procedural and substantive clarity, harmonize judicial practice, and safeguards fundamental rights.

9.2 Proposed Analytical Framework

A coherent analytical framework should define the thresholds for each tier with specificity, integrating procedural guidelines and judicial safeguards.

1. Prima Facie Tier: sufficient evidence to justify initiation of proceedings, including registration of FIR. Cognizance, issuance of process, or framing on charge[28]. Courts should evaluate whether allegations, if accepted at face value, disclose an offence, without assessing credibility or weight of evidence.
2. Intermediate/Cogent Tier: Evidence stronger than prima facie but below conviction level certainty, enabling the court to summon additional accused, alter charges, or decide bail. Judicial articulation of this tier could adopt principles similar to Indian's Section 319 Cr.P.C., requiring "sufficient material" indicative of involvement[30].
3. Final Tier (Proof Beyond Reasonable Doubt): Highest standard, applied at trial, requiring moral certainty about guilt[31]. Comprehensive evaluation of testimony, documents, and circumstantial evidence, alongside cross-examination and rebuttal, ensures protection against wrongful conviction[32].

Such an analytical framework would allow Pakistani courts to operate within a consistent hierarchy of thresholds, minimizing arbitrariness and reinforcing the fairness of criminal adjducation[33].

9.3 Role of Judiciary and Legal Education

Judicial harmonization if essential for the effective adoption of a three-tier model. Courts can establish authoritative precedents by clearly articulating the evidentiary standard applicable at each procedural stage[34]. Equally, legal education and scholarly discourse should integrate the tiered evidentiary framework into criminal procedure curricula, fostering doctrinal literacy and critical awareness among future judges, lawyers, and prosecutors[35]. Academic commentary, comparative analysis, and research-driven guidelines can reinforce judicial application, bridging the gap between statutory silence and practical necessity.

In India, Section 319 Cr.P.C. explicitly allows courts to summon additional accused during trial if sufficient material exists, bridging the intermediate evidentiary gap between prima facie satisfaction and proof beyond reasonable doubt[36]. Pakistani criminal procedure lacks a comparable statutory provision, compelling courts to rely on broad discretionary powers or invoke inherent jurisdiction. This lacuna produces inconsistent applications and uncertainty, as demonstrated in *Muhammad Ashraf v. State* (PLD 2005 SC 702)[38]. Formal recognition or codification of an intermediate tier would enable courts to act decisively on cogent evidence without overstepping procedural safeguards or violating due process.

10. Conclusion

The three tier evidentiary model, prima facie, cogent/strong evidence, and proof beyond reasonable doubt offers a structured and logical approach to criminal adjudication. Each tier function as a filter, escalating judicial satisfaction while ensuring fairness and proportionality[39].

Pakistan's current criminal jurisprudence suffers from a doctrinal gap, particularly due to the absence of analogous to Section 319 Cr.P.C. leading to inconsistent application of intermediate

evidentiary threshold[40]. Formal doctrine recognition, combined with judicial harmonization and academic reinforcement, is essential to address this gap and to enhance predictability, fairness, and accountability in the criminal justice system[41].

Ultimately, justice in criminal law depends not solely on the existence of evidence, but on the correct threshold at which it is assessed. Recognizing and operationalizing the three-tier framework would not only protect accused individuals from wrongful prosecution but also empower the state to act decisively against genuinely culpable parties[42]. A coherent codified doctrine of evidentiary threshold would therefore serve as both a procedural and substantive safeguard, central to the integrity of Pakistan's criminal justice system.

References

1. *Tariq Pervez v. State*, 1995 SCMR 1345 (SC Pak) – available on PLD/SCMR databases.
2. *Muhammad Nawaz v. State*, 2016 SCMR 267 (SC Pak).
3. *Muhammad Mansha v. State*, 2018 SCMR 772 (SC Pak).
4. *State v. Muhammad Ashraf*, PLD 2005 SC 702.
5. *Hidayatullah v. The State*, PLD 1972 SC 677.
6. *Muhammad Akram v. State*, 2009 SCMR 230.
7. *State of Bihar v. Ramesh Singh*, AIR 1977 SC 2018 (India) – available via Indian Kanoon.
8. *Khalid Javed Khan v. State*, 2016 SCMR 1618.
9. *Hardeep Singh v. State of Punjab*, (2014) 3 SCC 92 – available on Indian Kanoon.
10. *Tariq Bashir v. State*, PLD 1995 SC 34.
11. *Tariq Pervez v. State*, 1995 SCMR 1345 (SC Pak).
12. *Muhammad Ashraf v. State*, PLD 2005 SC 702.
13. *Muhammad Arif v. State*, PLD 2001 SC 1280.
14. *Kamal Singh v. State of Rajasthan*, AIR 1977 SC 1700 (India).
15. *Rashid Ahmed v. State*, PLD 2007 SC 456.
16. *Ghulam Abbas v. State*, 2012 SCMR 1457.
17. *Muhammad Akram v. State*, 2009 SCMR 230.
18. *Khalid Javed Khan v. State*, 2016 SCMR 1618.
19. Section 319 Cr.P.C., India – summoning additional accused (downloadable via Indian Kanoon).
20. *Hardeep Singh v. State of Punjab*, (2014) 3 SCC 92 (India).
21. *State of Bihar v. Ramesh Singh*, AIR 1977 SC 2018 (India).
22. *Hidayatullah v. The State*, PLD 1972 SC 677.
23. *Tariq Bashir v. State*, PLD 1995 SC 34.
24. *Muhammad Nawaz v. State*, 2016 SCMR 267.
25. *Muhammad Akram v. State*, 2009 SCMR 230 (SC Pak).
26. Section 319 Cr.P.C., India – summoning additional accused (Indian Kanoon).
27. *Khalid Javed Khan v. State*, 2016 SCMR 1618.
28. *Hidayatullah v. The State*, PLD 1972 SC 677.
29. *Tariq Pervez v. State*, 1995 SCMR 1345.
30. *Hardeep Singh v. State of Punjab*, (2014) 3 SCC 92 (India).
31. *Muhammad Arif v. State*, PLD 2001 SC 1280.

32. *Rashid Ahmed v. State*, PLD 2007 SC 456.
33. *Ghulam Abbas v. State*, 2012 SCMR 1457.
34. *Muhammad Nawaz v. State*, 2016 SCMR 267.
35. Javed Iqbal, *Evidentiary Thresholds in Criminal Law* (Journal of Pakistan Legal Studies, 2020).
36. Section 319 Cr.P.C., India – commentary and judicial application.
37. *Muhammad Ashraf v. State*, PLD 2005 SC 702.
38. *Khalid Javed Khan v. State*, 2016 SCMR 1618.
39. *Tariq Bashir v. State*, PLD 1995 SC 34.
40. *Muhammad Mansha v. State*, 2018 SCMR 772.
41. Farooq A. Khan, *Doctrinal Gaps in Evidentiary Assessment in Pakistan* (2021) 12 PLJ 45.
42. Ibid.