

Stereo HCJDA-38  
Judgment Sheet  
**IN THE LAHORE HIGH COURT, LAHORE.**  
JUDICIAL DEPARTMENT

**Crl. Appeal No. 56371 of 2023**  
(*Shameer Khan versus The State and another*)

**JUDGMENT**

<b>Date of hearing:-</b>	19-11-2025
<b>Appellant by:-</b>	M/s Muhammad Amjad Hussain Rizvi and Zubair Ahmad Virk, Advocates.
<b>State by:-</b>	Miss Nuzhat Bashir, Deputy Prosecutor General

**MUHAMMAD TARIQ NADEEM, J.:-** Through this criminal appeal filed under Section 48 of the Control of Narcotic Substances Act, 1997, Shameer Khan (hereinafter referred to as the “appellant”) has called in question the *vires* of judgment dated 17.07.2023, passed by the court of learned Additional Sessions Judge, Depalpur, District Okara (hereinafter referred to as the “trial court”), in case FIR No.1211 dated 28.11.2022, for an offence under Section 9(1)3(c) of the Control of Narcotic Substances Act, 1997, registered at Police Station Hujra Shah Muqeem, whereby he was handed down a guilty verdict in terms of **Section 9(1)3(c) of the Control of Narcotic Substances Act, 1997,** and sentenced to undergo rigorous imprisonment for eleven years along with fine of Rs.2,00,000/- or in default thereof, to further undergo simple imprisonment for six months, *however*, benefit provided under section 382-B Cr.P.C. was extended to him.

2. The prosecution story as given in Paragraph No.2 of the impugned judgment reads as under:-

“2. Prosecution version as mentioned in FIR Ex.P-A lodged on the complaint (Ex.P-C) of Muhammad Azam S.I. (PW.5) that on 28.11.2022 he alongwith Sajid Ali 1430/C, Muhammad Imran 1989/C, Sardar Ali 1410/C on official vehicle driven by Muhammad Hussain 1743/C were present at Hansa Wala Mor

Kasur Depalpur Road for patrolling duty. On spy information raid was conducted at pul 18-D one person suspiciously tried to flee away on seeing them. They apprehended him. He disclosed his name Shameer Khan son of Atta Muhammad caste Hans resident of 4-D. He was personally searched by Azam Ali SI and a blue colour plastic bag was recovered from his left hand. Three pieces of charras rectangular in shape having dark brown colour wrapped in yellow colour tape were recovered from said shopper. First piece of recovered charras was weighed and it was found 1100 grams, second piece of charras was weighed and it was found 1100 grams and third piece of charras was weighed and it was found 1050 grams P-3 by computerized weighed scale by Azam Ali SI. Three pieces were respectively weighed and it was found 3250 gram. The said bag was further checked by Azam Ali SI and Rs.850/- was recovered. Azam Ali SI separated 55 gram charas as sample from first piece, 55 gram charras as sample from second piece and 53 gram charras as sample from third piece for its chemical examination at PFSA Lahore. Samples of charras were weighed respectively and it was found 163 gram. The said three parcels and remaining recovered three pieces of charas were made into six sealed parcels and one parcel of recovered said Rs.850/- were made into sealed parcel by Azam Ali SI by embossing stamp M.A alongwith blue colour shopper and the same was taken into possession vide recovery memo Ex.PB.”

3. After registration of FIR, investigation of the case was entrusted to Umar Farooq S.I/I.O (PW.7) and after his investigation, report under Section 173 of the Code of Criminal Procedure, 1898, was submitted before the trial court. On indictment, the appellant pleaded not guilty and claimed trial. To substantiate its case, the prosecution produced seven witnesses in all, amongst whom, Jafar Hussain ASI (PW.1) is the scribe of FIR (Exh.PA), Muhammad Imran 1989/C (PW.2) is one of the two recovery witnesses, Ijaz Ahmad ASI (PW.3) is Incharge malkhana Depalpur, Sajid Ali 1430/C (PW.4) took complaint (Exh.PC) from

the crime scene to the police station for registration of FIR, Azam Ali S.I (PW.5) is the complainant of the case, Husnain Raza 983/HC (PW.6), being Moharrar malkhana, received sample parcels as well as remaining parcels of case property and subsequently handed over sample parcels to Azam Ali S.I. (PW.5) for onward transmission to the office of Punjab Forensic Science Agency, Lahore, whereas Umar Farooq S.I (PW.7) is investigating officer of the case. The prosecution, after giving up Sardar Ali 1410/C as unnecessary and presenting the report (Exh.PE) issued by the Punjab Forensic Science Agency, Lahore, closed its evidence. Thereafter, the appellant was examined under Section 342 Cr.P.C. during which he again denied the allegation and pleaded innocence, however, he neither opted to record his statement under Section 340(2) Cr.P.C. nor produced any evidence in his defence. Upon culmination of trial, the trial court delivered the impugned judgment, convicting and sentencing the appellant as previously detailed.

4. We have heard the arguments advanced by learned counsel for the appellant as well as learned Deputy Prosecutor General assiduously and perused the record minutely.

5. In narcotics cases, the prosecution must substantiate not only the events unfolded as the FIR foretold, but also that the seized contraband comprising of sample parcels and remaining case property was kept in safe custody right from the crime-scene to the police station and thereafter safe transmission of sample parcels from the police station to the office of Punjab Forensic Science Agency for the purpose of analysis.

The learned Deputy Prosecutor General has ardently endeavored to persuade the Court that the safe custody of case property and the safe transmission of sample parcels to the office of Punjab Forensic Science Agency have been incontrovertibly established, with no breach in the chain of custody, yet, upon a meticulous scrutiny of the prosecution evidence, it is apparent that

the assertions of learned Deputy Prosecutor General find no firm foundation from the record.

In this context, it is imperative to highlight that Azam Ali S.I/complainant (PW.5), during his examination-in-chief, largely reiterated the allegations contained in complaint (Exh.PC) but during cross-examination, he (PW.5) explicitly stated as follows:-

*“Whenever I leave the police station I incorporate my purpose of departure from police station, similarly, when I come back at police station I incorporate the factum of proceedings conducted by me outside the police station in my rupt of arrival. Same procedure was adopted by me at police station Hujra Shah Mugeem on 28.11.2022. I have seen rupt No.31 Exh.PD on the basis of which I came back at police station at about 03:30 pm and incorporate my arrival in the said rupt. I incorporated my return to the police station from place of occurrence through said rupt No.31 Exh.DE correctly. It was my version that I handed over the custody of accused and case property/parcels to the I.O at the place of occurrence. It is correct that in rupt No.31 Exh.DE it has been incorporated that accused of case FIR No.1211/2022 and case property was handed over to the I.O.*

His credibility being a material prosecution witness has been further called into question by the subsequent answers which he provided during cross-examination and in this regard, relevant lines from his cross-examination read as under:-

*It is correct that as per registered Roznamcha Exh.DB I entered my arrival at police station for the first time on 02.12.2022 at 10:10 am . It is not remember to me whether prior to 10:10 am I was present at police station or not on 02.12.2022? -----*

*-----  
it is correct that as per Exh.DD the remaining case property of the present case was transmitted from police station to the office of main malkhana on 02.12.2022 at 09:28 am and the same was deposited in the office of main malkhana at 07:10 pm on 02.12.2022. it is correct that as per Exh.DC the sample parcels of the present case was transmitted from police station to the office of PFSA on 02.12.2022 at 09:21 am and the same was deposited in the office of PFSA at 07:19 pm on 02.12.2022. The witness volunteered that the case property including currency notes were also deposited in the main malkhana on 02.12.2022 through separate road certificate No. 637. The PFSA collection center Sahiwal is situated at a distance of*

*about 55 km from malkhana Saddar Depalpur and it may consumed about one hour. The office of PFSA collection Center Sahiwal remains open at 08:00 am till 04:00 p.m.*

It is astonishing to note here that Azam Ali S.I/complainant (PW.5) admitted during his cross-examination that according to road certificate (Exh.DD), on 02.12.2022 at 09:28 a.m. the remaining case property was transmitted from police station to main malkhana and same was deposited in the office of main malkhana on 02.12.2022 at 07:10 p.m. whereas according to road certificate (Exh.DC), sample parcels were transmitted from police station to the office of Punjab Forensic Science Agency, Collection Center, Sahiwal on 02.12.2022 at 09:21 a.m. which were deposited in the said agency at 07:19 p.m. on the same date. According to his (PW.5) own testimony, the office of the said agency was located at a distance of 55 kilometers away from malkhana Saddar Depalpur and it took one hour to reach there. The question as to how he (PW.5), after depositing the remaining case property in the office of main malkhana on 02.12.2022 at 07:10 p.m. could have reached at the office of Punjab Forensic Science Agency, Collection Center, Sahiwal, from main malkhana within just nine minutes i.e. at 07:19 p.m. on 02.12.2022, has not been satisfactorily answered by the prosecution, making the safe transmission of sample parcels to the office of the Punjab Forensic Science Agency, Collection Center, Sahiwal, highly doubtful.

Similarly, the testimony of Husnain Raza 938/HC (PW.6), who was posted as moharrar at Police Station Hujra Shah Muqem, is also fairly imprecise and raises serious concerns regarding his capability being a reliable witness. He (PW.6) stated that on 28.11.2022, Umar Farooq S.I/I.O (PW.7) handed over to him seven sealed parcels, which included six parcels containing charas and one parcel containing cash amounting to Rs.850/- for safe custody. He (PW.6) further deposed that on 02.12.2022, he handed over three sealed sample parcels of charas and four parcels of remaining case property to Azam Ali S.I/complainant (PW.5), who

subsequently deposited three sample parcels in the Punjab Forensic Science Agency, Collection Center, Sahiwal intact and Azam Ali S.I/complainant (PW.5) also stated during his examination-in-chief on the same lines, but during cross-examination upon Husnain Raza 938/HC (PW.6) when he was confronted with the entries available in Register No.XIX, he frankly conceded that the details of the case property and parcels which were handed over to him at the police station were notably missing. This omission undermines the clarity and reliability of the chain of custody, which is undoubtedly a crucial aspect under the Qanun-e-Shahadat Order, 1984, for sustaining the evidentiary value in criminal proceedings in our country. The absence of proper entries in the official register may affect the probative value of this testimony and calls for careful judicial scrutiny. For convenience, relevant lines of his testimony read as under:-

*“...I have seen manual copy of register No.19 and all the entries regarding the present case are correctly entered in it. Column No.4 and registered No.19 deals with the case property/parcel which are handed over to Moharrar at police station. Column No.5 & 6 deals regarding the transmission of case property from police station to the quarters concerned. It is correct that in column No.4 in register No.19 the detail of parcels/case property were only mentioned which were sent to the office of PFSA and main Malkhana. It is correct that in any column registered No.19 detail of case property/parcels which were handed over to me at police station is not mentioned....”*

In the light of above noted discrepancy in the statement of Husnain Raza 938/HC (PW.6), the matter before us necessitates a comprehensive judicial examination of the critical role and mandatory nature of Register No.XIX, formally designated as the Store-Room Register under Rule 22.70 of the Punjab Police Rules, 1934. This register is not a procedural formality but an indispensable cornerstone of criminal justice, particularly where the prosecution relies upon the seizure and custody of case property. Its meticulous maintenance is judicially imperative to safeguard the integrity of the evidentiary process, which is foundational to the

fair trial guarantee. We may observe here that this register functions as the primary, contemporaneous, and verifiable documentary account for every article deposited into the police station's *malkhana* (store-room), excluding items logged in Register No. XVI. The statutory mandate under Rule 22.70 *ibid* is prescriptive, demanding the recording of specific data fields, including the sequential serial number, FIR details, the date and name of the depositing official, a detailed description of the property, disposal references, the method and date of disposal, and the recipient's signature. This structured requirement is fundamentally designed to establish and preserve the unbroken chain of custody for all seized items. This chain is the mechanism by which the trial court verifies that the case property, such as illicit narcotics under the stringent Control of Narcotic Substances Act, 1997, or other tangible exhibits, has remained secure and unaltered from the point of recovery until its production in Court. The integrity of this chain is a non-negotiable prerequisite for upholding the reliability of the evidence. Furthermore, the maintenance of Register No.XIX finds supplementary statutory support in Section 44 of the Police Act, 1861, and Section 167 of the Police Order, 2002, which mandate the recording of all properties taken into possession in the daily diaries (Register No.2 or *Roznamcha*). Register No.XIX complements this by providing the definitive custodial history within the *malkhana*. The integrity of this record is highly secured by the Punjab Police Rules, 1934, as Rule 22.45 designates it an essential record and Rule 22.46 strictly forbids any unauthorized alteration, requiring the express sanction of the Inspector General of Police. These Rules demand that the entries be made neatly, paginated, and, most importantly, logged immediately upon deposit, acting as a deliberate safeguard against tampering.

In the context of the trial, the production of a complete and accurate Register No.XIX is a substantive evidentiary requirement, essential for corroborating the recovery memos, the FIR, and

testimonies of witnesses. Conversely, any demonstrable deficiency, omission, or inconsistency in the entries, such as failing to record the precise date, depositor's identity, or time of deposit, is consistently held by the Superior Court to constitute a fatal breach, rendering the chain of custody "broken." A broken chain of custody vitiates the evidentiary value of the seized material, fundamentally impairing the reliability of the prosecution's case and attracting an adverse inference against the prosecution under Article 129(g) of the Qanun-e-Shahadat Order, 1984. We may also observe here that the failure to maintain or produce complete Register No.XIX entries proves invariably fatal to the prosecution. Judicial precedents emphasize strict compliance with procedural mandates, in accordance with the maxim, "*A communi observantia non est recedendum*" (There must be no departure from established observance or rule). This rigorous standard is particularly crucial in narcotics cases, where the Government Analyst's report under Section 36 of the CNSA, read with Rules 5 and 6 of the Control of Narcotic Substances Government Analysts Rules, 2001, relies wholly upon the Court's satisfaction that the sample transmitted was intact. Precedents from the Superior Court confirm that even minor material gaps concerning the custody record entitle the accused person to the benefit of doubt and subsequent acquittal. Register No.XIX, therefore, is the definitive judicial assurance against miscarriages of justice stemming from compromised evidence, and its meticulous compliance is essential for both evidentiary admissibility and maintaining the integrity of police *malkhana* operations. While holding so, we have been fortified by the dictum laid down in cases titled as "*Khair-ul-Bashar vs. The State*" (2019 SCMR 930) and "*Jeehand vs. The State through Prosecutor General Balochistan*" (2025 SCMR 923). In *Jeehand's* case, the Supreme Court of Pakistan has been pleased to hold as under:-

“..... We have noted that in the instant case, safe



*custody and safe transmission of the alleged drugs from the spot of recovery till it's receipt by the Narcotic Testing Laboratory are not satisfactorily established. The Police Rules mandate that case property be kept in the Malkhana and that the entry of the same be recorded in Register No. XIX of the said police station. It is the duty of the police and prosecution to establish that the case property was kept in safe custody, and if it was required to be sent to any laboratory for analysis, to further establish its safe transmission and that the same was also recorded in the relevant register, including the road certificate, etc. The procedure in the Police Rules ensures that the case property, when it is produced before the court, remains in safe custody and is not hampered with until that time. A complete mechanism is provided in the Police Rules qua safe custody and safe transmission of the case property to concerned laboratory and then to the Trial Court.*

*Mr. Zakir Ali, in-charge store room, appeared as PW-3 and stated that on 31 October 2020, the investigating officer, Liaquat Ali, handed over parcels Nos. 1 to 104 and the Corolla car to him which he entered in Registered No. XIX. On 1 November 2020 after receiving English docket, he sent the parcels to Karachi Laboratory through Muhammad Rahim, however, the said witness did not produce copy of Register No. XIX. Keeping in view the glaring contradiction between the statements of said witness recorded under section 161 Cr.P.C. and statement recorded before the Trial Court in respect of number of parcels handed over to him by the investigating officer, the prosecution should have proved the safe custody of parcels by production of Register No. XIX in which entry was made regarding receipt and placing of parcels in the store room. Under Article 129(g) of Qanun-e-Shahadat Order, 1984 ("the Order") it can be presumed that the prosecution did not produce Register No. XIX because the in-charge of the store room had not entered the receipt of parcels in the said register. Under Article 102 of the Order, in all cases in which any matter is required by law to be reduced to the form of a document, no evidence shall be given in proof of such matter except the document itself, or secondary evidence of its contents in cases in which secondary evidence is admissible under Article 76. Therefore, oral testimony of PW-3 with regard to the safe custody of parcels was not admissible under Article 102 of the Order. Hence prosecution failed to prove safe custody of the parcels beyond shadow of doubt.*

*ii) It is a case of prior information that too in the court timings but the seizing officer neither tried to obtain search warrants as required by section 20 of the Act of 1997 nor he has offered any reason/justification for his non-compliance of the*

*command of section 20. Similarly, the prior information was never recorded in Register No. II as contemplated by rule 22.49 (n) of the Police Rules. This Court, in the case of Zain Shahid v. State (2024 SCMR 843), in paragraph 8 has observed as under:*

*"The case against the petitioner was initiated upon a spy information, but such information was not reduced into writing. Fair play demands that spy information should be reduced into writing in order to safeguard innocent persons against false implication."*

6. Upon being confronted with the above-noted inconsistencies in the prosecution's case, learned Deputy Prosecutor General could not provide any satisfactory explanation to the Court's queries. Consequently, these material contradictions render the prosecution's case fraught with discrepancies and made the same fundamentally unreliable. We, therefore, quite comfortably and confidently hold that the prosecution has not satisfactorily established the safe custody of the case property as well as the sample parcels from the place of occurrence to the police station. Moreover, the subsequent transmission of the sample parcels from the police station to the Punjab Forensic Science Agency is also cast in serious doubt. It is an established legal principle that the prosecution bears the burden to demonstrate that the chain of custody of both the case property and the separated sample parcels throughout remains intact, un-impeached, indisputable, safe, and secure. Any breach or lapse in the chain of custody or control over the possession of the sample will unquestionably raise doubts over the safe custody and transmission of such samples, thereby impairing and vitiating the conclusiveness and reliability of the Government Analyst's report. In the present case, the safe transmission of the parcels alleged to contain "charas" is, therefore, rendered doubtful. Reliance is placed on the case laws titled as "Ikramullah and others vs. The State" (2015 SCMR 1002), "Haji Nawaz vs. The State" (2020 SCMR 687), "Qaiser Khan vs. The State through Advocate-General, Khyber Pakhtunkhwa, Peshawar"

**(2021 SCMR 363), “*Abdul Ghani vs. The State*” (2022 SCMR 2121), “*Shah Zameen vs. The State*” (2022 SCMR 2149) and “*Asif Ali and another vs. The State through Prosecutor General Punjab*” (2024 SCMR 1408).**

7. At this juncture, we do not find it out of place to ponder upon the emphasis laid by learned Deputy Prosecutor General that the prosecution witnesses, all police officials, consistently supported the prosecution’s case during their examination-in-chief but conceded advantageous points for the defense under cross-examination. The Qanun-e-Shahadat Order, 1984 provides the governing framework for recording, challenging and evaluating witness’s testimony. Articles 150 and 151 of the Order *ibid* are relevant when a prosecution witness deviates from his earlier statement or gives evidence favourable to the accused. Article 150 of the Order *ibid* empowers the Court, in its discretion, to allow the prosecution to treat its own witness as hostile. Likewise, Article 151 of the Order *ibid* permits impeachment of the witness’s credit. These provisions collectively ensure that the truthfulness of testimony is tested and that deviations from earlier statements are properly dealt. For the purpose of clarity, Article 150 of the Qanun-e-Shahadat Order, 1984, is reproduced as infra:

*“150. Question by party to his own witness.—The Court may, in its discretion, permit the person who calls a witness to put any questions to him which might be put in cross-examination by the adverse party.”*

In the overall perspective, once a prosecution witness assumes a concessional posture, the law obliges the prosecution to act with due diligence and in strict adherence to Articles 150 and 151 of the Order *ibid*. This includes seeking permission to treat the witness as hostile, confronting him with earlier statements except recorded under section 161 Cr.P.C. for the purpose of contradiction and impeaching his credit where necessary. The jurisprudence of this Court leaves no doubt that omission to adopt these measures results in the favourable portion of the testimony standing admitted.

However, observance of these safeguards is essential for maintaining the integrity of the prosecution's case and for ensuring that the evidentiary process conforms to the statutory mandate. The Supreme Court of Pakistan has also, on multiple occasions, reiterated that when a prosecution witness deviates from the prosecution case or tends to favour the accused, it becomes incumbent upon the prosecution to invoke aforementioned statutory provisions and if the prosecution acts as a silent spectator, then adverse testimony, which is not checked, attains binding effect for extending its benefit to the accused, meaning thereby, the prosecution ought to have sought a declaration of hostility and its failure to do so materially weakened its own case. In this context, we have been guided by the pronouncement of the Supreme Court of Pakistan in cases reported as "Muhammad Boota and another vs. The State and another" (1984 SCMR 560) and "Mukhtar Ahmad vs. The State" (2003 SCMR 1374).

Coming to the issue involved in the case in hands, no doubt is left that the prosecution remained passive during cross-examination upon its material witnesses, failing to challenge evasive or concessionary answers given by them, nor sought to declare any witness hostile for this purpose. This conduct reflects the prosecution's implicit acceptance of the doubts raised by its own witnesses, undermining the prosecution's case.

8. The Control of Narcotic Substances Act, 1997, provides severe penalties on those engaged in narcotics-related offences, for the reason, very strong and credible evidence is required to secure conviction against the offender. However, such evidence is absent in this case, making the prosecution's case highly doubtful. It is a settled principle of law that the accused is not required to establish multiple circumstances creating doubt in the prosecution case rather single circumstance casting reasonable doubt in a prudent mind suffices to acquit the accused. This case is replete with such circumstances that raise serious doubts about the prosecution's case

against the appellant, benefit of which must be given to him as a matter of right and not of grace. Reliance is placed upon the case laws titled as “Ahmed Ali and another vs. The State” (2023 SCMR 781) and “Farman Ali and another vs. The State” (2025 SCMR 1730).

9. For the reasons discussed above, we find the prosecution evidence gravely insufficient, rendering the conviction and sentence of the appellant by the trial court unsustainable in the eye of law. Accordingly, we **allow** the appeal, set aside the impugned judgment dated 17.07.2023, and **acquit** the appellant of the charge. The appellant, in custody, shall be released immediately unless required to be kept in jail in connection with any other case. The case property i.e. *charas*, shall be dealt with according to law, as directed by the trial court in the impugned judgment.

10. Before parting with this judgment, we would like to observe here that we have frequently encountered instances, particularly in narcotics cases, where Law Officers representing the State have failed to discharge their statutory and professional duties diligently during the recording of statements of prosecution witnesses and other proceedings of the case. This recurring deficiency undermines the prosecution’s case and calls for strict adherence to procedural responsibilities in future proceedings. We have, therefore, observed with concern that,

1. Certain Law Officers remain passive or silent spectators during the examination-in-chief and cross-examination of prosecution witnesses as well as statement(s) under Section 342 Cr.P.C. of accused and defence evidence, particularly in cases registered under the narcotics laws.
2. Police officials, while appearing as prosecution witnesses, sometimes deliberately offer concessions to the accused or depose in a manner that weakens the prosecution case.
3. Such conduct creates loopholes in the prosecution evidence, resulting in the accused obtaining undue benefit and ultimately being acquitted on technical or evidentiary grounds. The Law Officers do not bother to recommend departmental legal action against the

delinquent police officials/witnesses who give concessional statements in favour of accused.

We have observed with serious concern that the escalating threat posed by drug traffickers severely undermines societal peace and disproportionately impacts youth. Distressingly, daily reports confirm the apprehension of numerous drug peddlers. This menace not only endangers public tranquillity but also finances anti-state and terrorist activities that have plagued the country for decades. The Court has emphasized that the integrity of narcotics trials hinges on the proactive, competent, and vigilant conduct of Law Officers, who must ensure that no witness undermines the prosecution's case and that every deviation is promptly addressed per legal mandates. This Court has expressed serious concern over this recurrent issue, emphasizing that the role of the Law Officer transcends mere formality as the Law Officer is duty-bound to actively assist the Court, uphold the interests of justice, and ensure that the prosecution's case is presented with utmost diligence, clarity, and legal precision. To address these deficiencies and prevent miscarriage of justice, this Court issues the following directions:

1. All Law Officers must remain vigilant, active, and fully engaged during the recording of prosecution evidence, statement(s) of accused under Section 342 Cr.P.C. and defence evidence, especially in narcotics cases where the margin of error could lead to the acquittal of drug traffickers.
2. Where any prosecution witness, including a police official, deviates from the facts or intentionally makes statements favorable to the accused, the Law Officer must immediately invoke the powers under Articles 150 and 151 of the Qanun-e-Shahadat Order, 1984, which permit asking questions to test the veracity, credibility, and conduct of the witness.
3. Law Officers must not allow any intentional or unintentional concessions granted by police witnesses to go unchallenged. They are required to take appropriate legal steps to protect the prosecution's case. They should recommend departmental legal

action against the police officials/witnesses who give concessional statements in favour of accused.

4. The Prosecutor General Punjab, Lahore is also directed to personally look into this matter, identify the causes leading to weak prosecution, and take necessary steps to ensure accountability and improvement in performance. He shall issue comprehensive instructions to all Law Officers across Punjab to strictly follow the legal procedure and exercise their authority under Articles 150 and 151 of the Qanun-e-Shahadat Order, 1984, during trial proceedings.
5. Failure to comply with these directions must result in disciplinary action, as no negligence on part of the State's legal representatives should be tolerated where the administration of justice is compromised.

We also direct the Registrar of this Court to dispatch the copies of this judgment to the Secretary, Law and Parliamentary Affairs Department, Government of the Punjab, Lahore, the Prosecutor General Punjab, Lahore, the Director General, Anti-Narcotic Force, Islamabad and the Inspector General of Police, Punjab, Lahore, with the direction to enforce the above-noted measures vigorously for the noble purpose of upholding the justice so as to curb such a societal scourge of drug peddling.

**(Farooq Haider)**  
**Judge**

**(Muhammad Tariq Nadeem)**  
**Judge**

**APPROVED FOR REPORTING.**

**(Farooq Haider)**  
**Judge**

**(Muhammad Tariq Nadeem)**  
**Judge**