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NARCO ANALYSIS: CONNECTING SCIENCE WITH CRIMINAL JUSTICE

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ABSTRACT

Criminal justice system in India is conventional but criminals today are evolving, so we need to reconfigure the entire system. There needs to be incorporation of both science and the law, i.e., addition of scientific evidence to aid in the efficient administration of justice. The system of justice has become increasingly dependent on medical science to administer justice, yet it is still debatable to what extent this medical information should be considered admissible. An effort in this article to show so that this kind of evidence can be used for effective administration of justice.

With the recent Shraddha Walker Murder Case, where the accused named Aftab Poonawala has murdered his live-in-partner and the court has ordered for the narcoanalysis test, the debate as to whether the usage of such procedures in investigation lead to violation of fundamental rights of the accused has surfaced again. This Article states the position of Narcoanalysis in India starting with its origin, the procedure, and its legality under the Indian Evidence Act. It also discusses about its admissibility as scientific evidence in Court with help of cases where such procedure has aided in investigation.

I. NARCOANALYSIS – ORIGIN AND MODUS OPERANDI

The term “narcoanalysis” comes from the Greek word “narke” which means “anaesthesia” or

“torpor”. Police have been using the narcoanalysis test in recent years to verify the facts or conclusions or to acquire information that they are unaware of and assume the subject of the test is aware of. The reason this test is known as the “truth serum test” is that the subject in this case is using drugs, is in a quasi-state of mind, and loses self-control and restrictions, which causes him to reveal the truth.²¹⁵⁶ Thus, the subject is unable to influence his responses. The serum referred to here is Sodium Pentathol, a medication that has been utilized in clinical settings. It is typically used to administer anesthesia, but at the appropriate dosages, it can put the user in a trance-like state and hinder his ability to think. The person will no longer be able to communicate on his own, but he will still be able to respond to concise, basic questions.

In 1935, an investigation in India employed narco-analysis for the first time. With the aid of various drugs, the subject was made semi-conscious so that specific questions could be asked of him. It was not employed for many years again after this instance. It once more entered the judicial landscape during the Godhra Communal Riots in 2002. After this, narcotics tests have frequently been performed.

A. Procedure to perform Narcoanalysis

The procedure is performed with utmost care and supervision in presence of medical experts and each step is recorded. The following steps should be followed to conduct a narcoanalysis test:

Firstly, the prescribed amount of “sodium pentathol” is dissolved in solution of “dextrose solution”. It is also referred to as “Penthol Sodium” or “Thiopental” or “Thiopentone”. Then the solution created is injected into the subject intravenously, until the State of Trans is reached. The dosage depends upon the physical characteristics and other health statistics of the

²¹⁵⁶ Ms. Snehal S. Shinde, *Narco - Analysis - A Tool of Investigation*, 3 International Journal of Multidisciplinary Research and Development, 298-301 (2016), <http://www.allsubjectjournal.com/archives/2016/vol3/issue8/3-9-12> (last visited Oct 1, 2022).

person. This treatment is carried out in a hospital under medical supervision by a group that includes a physician, an anesthesiologist, and a clinical/forensic psychologist. Regular checks in frequent intervals are made of the person's heart rate and blood pressure. Certain irrelevant questions, referred to as controlled questions, are initially asked to stabilize the subject. Until the Trans-like state is attained, the medication is delivered into the body. When the subject is in a trance, pertinent questions are posed. Both audio and video recordings of the entire operation have been made. In addition to the final report, a recording in CD must be produced.²¹⁵⁷

Narcoanalysis Under Indian Evidence Act

When it comes to Narcoanalysis the most relevant section that applies is Section 45. However, there are contrasting opinions on the subject. The **State Vs. Chaudhary case**²¹⁵⁸, which was recently decided, has attempted to introduce new types of scientific evidence. According to Section 45, "specially skilled" individuals are considered experts. Despite the lack of a formal definition, "special skill" is generally understood to represent "knowledge gained via fundamental education, life experience, research, training, and participation in scientific conferences."²¹⁵⁹ The Supreme Court has ruled that it is prudent to seek out professional assistance. Then, section 46 deals with expert opinion²¹⁶⁰, section 51 deals with the relevance of the opinion²¹⁶¹, and section 159 deals with memory refreshment²¹⁶². These entire parts are pertinent to the accuracy of narcoanalysis. Sections 292 and 293 of the Code of Criminal Procedure refer to "expert evidence." According to Section 293, the "Government expert" whose opinion was requested on the topic may be used as a basis

for both an investigation and a trial²¹⁶³. The results of narcoanalysis tests may be admitted into evidence under any of these clauses during a trial. Therefore, the results of a narcoanalysis test may establish the innocence of an accused individual or confirm their guilt, serving as crucial expert evidence.

Admissibility Of Scientific Evidence In India

In India, there has been considerable discussion about the admissibility of scientific evidence, particularly in light of the **Selvi v. State of Karnataka**²¹⁶⁴ case, in which the Honourable Supreme Court ruled that "polygraph, narcoanalysis, and brain-mapping tests cannot be performed without the accused person's consent". The admissibility of such kind of evidence raises some significant issues regarding the fundamental rights that accused parties are entitled to under various Indian legal statutes. The main issue is that we always examine legal provisions from the perspective of the accused and completely ignore the suffering, agony, and trauma experienced by victims and their families. Scientific evidence can be accepted in court without any changes if certain sections were interpreted in a different way.

NARCOANALYSIS IN CRIMINAL JUSTICE SYSTEM

It is employed in the criminal justice system for investigative purposes. Narcoanalysis is frequently employed in terrorism, organized crime, serial killings, instances where there is no evidence, etc. Suspects that undergo a narcotics analysis test fall into one of two categories:

1. When the suspect voluntarily offers to help and cooperates with the investigator.
2. When a suspect is ordered by a court to perform the test.

The benefit of narcotics analysis is that it helps prevent the prosecution of innocent people and

²¹⁵⁷ Niranjana Rajalakshmi, *what is a Narcoanalysis Test?* SCIENCE.THEWIRE.IN, <https://science.thewire.in/the-sciences/narcoanalysis-test-sodium-thiopental-hathras-case-gaba-anaesthesia-ethics/> (last visited Oct 1, 2022).

²¹⁵⁸ State v. Chaudhary, AIR 1996 SC 1491.

²¹⁵⁹ Indian Evidence Act, 1872, § 25, No. 1, Act of Parliament, 1872 (India).

²¹⁶⁰ Indian Evidence Act, 1872, § 46, No. 1, Act of Parliament, 1872 (India).

²¹⁶¹ Indian Evidence Act, 1872, § 51, No. 1, Act of Parliament, 1872 (India).

²¹⁶² Indian Evidence Act, 1872, § 159, No. 1, Act of Parliament, 1872 (India).

²¹⁶³ Code Crim. Proc. § 293.

²¹⁶⁴ Selvi v. State of Karnataka, (2010) 7 SCC 263.

does away with the third-degree procedure. Additionally, it has been utilized as a time-saving tool in criminal cases.

A. Issues Involved with Narcoanalysis as a Tool in Investigation

Most of the scientific evidence is based on the rule of probability, however narcoanalysis is not, hence it is weak evidence. Evidence from narcoanalysis links the accused to the proper materials and circumstances. Because of inexperience, a lack of training, or ignorance, it may not be very helpful to use expert evidence if evidence material is not gathered effectively. As a result, the following should be taken into consideration while conducting a narcoanalysis test:

- a) The truth serum must be administered by a highly skilled medical professional.
- b) Determining the drug's dosage is crucial.

There is no additional test that can be used to replace or validate the results of the narcoanalysis test because it stands alone. The accused's testimony is direct; thus, the test findings do not need to be corroborated by any other procedures. On the other hand, team performing the narcoanalysis determines the test's credibility. As a result, examinees are given extra scrutiny, and the entire test procedure is recorded to prevent errors that could result from their unsupervised actions.

One of the main problems with narcoanalysis is maintaining confidentiality. Although it is crucial to maintain confidentiality to safeguard privileged communications, including those between a psychotherapist and a patient, many state laws do not recognize this relationship as protected.

If a suspect delivers false information during an interrogation for a narcoanalysis test, it may be partially due to the interrogator's asking style or it may be because the suspect is taking care to alternate between unconsciousness and attentiveness. On the other hand, a drug's dosage may be misleading. As a result, it is important to carefully examine the information

obtained during narco-interrogation while the subject was in a swing condition of ecstasy and awakening. Additionally, to eliminate this defect, supporting evidence gathered based on test results will eliminate the issue of false information.

Although there is lack of corroborative value, the information revealed may have some precautionary value in terms of preventing a crime from being committed. The investigator should thoroughly examine all the circumstantial and direct evidence related to the incident. The test's findings should be used to support that analysis. Therefore, retaining the privilege does not require maintaining the confidentiality of criminal matters. Instead of solely considering privacy and confidentiality concerns, it is crucial to disclose the test results to the court of law to support the criminal justice system. Additionally, the information collected has confidentiality, and safeguarding the privacy of such evidence becomes the ethical code of the team.²¹⁶⁵

Famous Cases where Narcoanalysis aided in investigation

The Nithari Murder case

The primary accused in the infamous Nithari Murder case, "Mohinder Singh Pandher and Surender Singh Koli, underwent a narco-analysis test in January 2007". This test took place in Gandhinagar's Forensic Science Laboratory. Basically, this examination was done to determine whether the information they provided during their questioning in a jail or prison was accurate. During this examination, the defendant provided the names of other women and children slaughtered by them, as well as his plan to rape the victims following their deaths. Many pertinent details were revealed through the execution of this test.²¹⁶⁶

²¹⁶⁵ Soham Sarkar and Shubham Singh, *Narco Analysis Test: Admissible OR Not?* (October 5, 2018). <https://ssrn.com/abstract=3687775>(last visited Oct 2, 2022).

²¹⁶⁶ *Pandher's narco tests reveal his debauchery*, (Times of India, 2007), <https://timesofindia.indiatimes.com/india/pandher-narco-tests-reveal-his-debauchery/articleshow/1129230.cms>. (last visited Oct 3, 2022).

Terrorist attack at the Indian Institute of Science (IISc), Bangalore Case

In December 2005, the IISc, Bangalore, was the target of a terrorist attack. The Laskar-e-top Toiba's commander, including others, were met by the apprehended suspect Abdul Rehman alias Raizur-Rehman while he was in Saudi Arabia, the suspect admitted after undergoing narcoanalysis and brain mapping tests. Additionally, he acknowledged having worked with Hizbul Mujahideen. Additionally, he acknowledged a 2003 trip to Dhaka that he had previously denied. He further admitted that the terrorist act had been carried out by Naveed and Naushad. This is a case where Narcoanalysis led to disclosure of relevant information about the terrorist attack.²¹⁶⁷

Abu Salem's case

Another instance of Narcoanalysis leading to disclosure of facts. The criminal Abu Salem's narcoanalysis test provided the investigative authorities with a new direction of investigation and guidance. Abu Salem underwent polygraph, brain mapping, and narcoanalysis tests to provide the Mumbai Police with the information they were after. In a highly guarded operation, Salem was the subject of a four-hour long narco test. A representative of the Forensic Science Lab recorded the entire procedure on camera. Abu Salem was taken to Mumbai after the test.²¹⁶⁸

Stamp Paper Fraud Case

Abdul Karim Telgi, the main suspect in the multibillion-dollar stamp paper scam, had a narcoanalysis test on March 3, 2004. The test, as well as its administration and protocol, sparked a legal discussion. Telgi provided some names during the test, but his attorney disputed the results. The P300/brain mapping test and a lie detector test were previously administered to Telgi. His attorney believed that narcoanalysis

could endanger life. but Contrary to this, Dr. S. Malini of the FSL insisted that the substance used in the test was entirely safe. On December 29, 2003, polygraph tests were also administered to Antim Totla in the multimillion-dollar stamp paper scam. The tests were carried out in Ahmadabad, and the charges were generated from the fact that the individuals were distant from the main defendant, Abdul Karim Telgi. It was also suggested that they undergo DNA fingerprinting and narcoanalysis. Following the seizure of several documents from Totla's home, the tests were carried out.²¹⁶⁹

Case of Preeti Jain and Naresh Pardesi

According to the police account, criminal Arun Gavali's erstwhile accomplice Naresh Pardesi received money from actress Preeti Jain in the amount of Rs. 2.5 lakhs. The police assert that they have a strong case. The police have named the contract murderer as Sami, a resident of the border region between Uttar Pradesh and Bihar. Preeti Jain had a Lie-detector test, a brain mapping exam, and a narcoanalysis test, whereas Pardeshi did not. Under the influence of sodium pentothal, Pardeshi spilled the plan. According to Pardeshi, Preeti hired him to kill Bhandarkar since the latter wanted to kill her after she falsely accused him of rape. This shows how narcoanalysis gave a new direction to the case.

JUDICIAL INTERPRETATION OF NARCOANALYSIS

As a result of the narcoanalysis test, each person entered a semi-conscious state in which they were unable to regulate their conscious thoughts and were unable to envision anything. It has been demonstrated that administering such a medicine may impair the subject's capacity for thought and reasoning. This means that this drug interferes with the functioning of the nervous system and brain hence the individual is unable to control his own actions.

²¹⁶⁷ Vicky Nanjappa, *IISc attack: A terrorist's stunning revelations*, (Rediff, 2008), <https://www.rediff.com/news/2008/apr/17terror1.htm> (last visited Oct 3, 2022).

²¹⁶⁸ Salem speaks out on underworld activities during narco test, (ZEE News India, 2005), https://zeenews.india.com/news/nation/salem-speaks-out-on-underworld-activities-during-narco-test_265817.html (last visited Oct 3, 2022).

²¹⁶⁹ Sheela Raval, *Fake stamp paper scam: Telgi's narco test faces legality issues*, (India Today, 2004), <https://www.indiatoday.in/magazine/states/story/20040223-narco-analysis-test-on-stamp-scam-accused-abdul-karim-telgi-790573-2004-02-22> (last visited Oct 1, 2022).

Consequently, the procedure brings up important concerns including the fundamental rights such as “right to life and liberty, and the protection against self-incrimination”. The Courts including the Supreme Court has expressed varying opinions according to facts and circumstances of the case.

A. Does Narcoanalysis leads to Self-Incrimination?

Although the narcoanalysis test was first performed in 2002 in the Godhra Carnage Case²¹⁷⁰, it was initially introduced in India in 1936. People began arguing this issue in 2004 after the Bombay High Court's ruling in the case of **Ramchandra Ram Reddy v. State of Maharashtra**²¹⁷¹. The key question in this case was whether using scientific evidence, specifically brain mapping and lie detectors, violated Article 20(3), and led to self-incrimination. The Supreme Court in this case stated that there is a technical difference between a “statement” and “testimony”. According to the court, taking test is intended to determine whether a person has a specific understanding of the crime and the targeted inquiry that has been asked of him. Therefore, it is impossible to say that statement is any extension of the imagination. It can most accurately be described as information that was obtained through a witness. Therefore, in the opinion of the court “it did not violate right against self-incrimination given under article 20(3) of Indian constitution”.

Does Narcoanalysis violate the accused “Right to remain Silent and Right to Privacy”?

The Supreme Court in the case of **Nandini Satpathy vs. P.L. Dani**²¹⁷² ruled that “no one can extract comments from the accused, who has right to silence during the course of questioning (investigation)”. The supreme court upheld the

allegation that “the right to remain silent is guaranteed by Article 20(3) of the Indian Constitution and Section 161(2) of the Criminal Procedure Code”. However, the investigating authorities contend that because the Narco-analysis test is designed to help gather evidence and advance the inquiry, it does not constitute testimonial coercion as defined by Article 20(3).

In the case of **Dinesh Dalmia v. State**²¹⁷³, High Court of Madras ruled during the hearing that “the scientific tests performed on the accused to elicit the truth—including a polygraph, brain mapping, and Narco-analysis would not constitute coercing him into confessing”.

The Supreme Court explicitly said in the case of **Dharampal v. State**²¹⁷⁴ that everyone has a responsibility to help the government bring criminal justice and detect crime since the criminal justice system cannot function properly if members of society are unwilling to cooperate. It must be understood that no one should keep illegal facts undisclosed and absolve themselves of social responsibility under the veil of right to privacy. Therefore, narcoanalysis would not lead to infringement of right to privacy.

Can Narcoanalysis be used for aiding in Investigation?

In the famous **Arushi Murder** case²¹⁷⁵, where, Arushi, a 14-year-old girl, was discovered dead in the house on May 16, 2008. Arushi's parents filed the report at the police station. In this case, “Hemraj, a domestic helper in Arushi's home, was suspected of the girl's murder. But after two days, Hemraj's body was also discovered on the rooftop of Arushi's residence. The police took Arushi's parents into custody and the accused person underwent a narco-analysis test, a polygraph test, and a brain mapping test”. The court held that the results of these tests could not be used as evidence in trial. Following the

²¹⁷⁰ Leena Mishra, *Narco-analysis gives some leads in Godhra case*, (Times of India, 2002), <https://timesofindia.indiatimes.com/city/ahmedabad/narco-analysis-gives-some-leads-in-godhra-case/articleshow/15393568.cms> (last visited Oct 1, 2022).

²¹⁷¹ Ramchandra Ram Reddy v. State of Maharashtra, (2005) 1 CCR 335.

²¹⁷² Nandini Satpathy v. P.L. Dani, AIR 1978 SC 1025.

²¹⁷³ Dinesh Dalmia v. State, (2006) CriLJ 2401.

²¹⁷⁴ Dharampal v. State, (2003) SC 0260.

²¹⁷⁵ Dr. Rajesh Talwar and Another v. Central Bureau Investigation through its Director and Other, (2013) 83 ALL.C.C. 283.

ruling in **Selvi v. State of Karnataka**²¹⁷⁶, the court determined that such tests cannot be carried out by the authorities without the accused person's assent. The trial court ruled that the test results could not be used as evidence since the individual did not have conscious control over their responses while the test was being administered.

While permitting the narcoanalysis test in the case of **Rojo George v. Deputy Superintendent of Police**²¹⁷⁷, the court is of the opinion that today's criminals have begun to employ sophisticated and contemporary tactics for committing the crime. Therefore, the traditional approach to investigating and interviewing offenders will not be effective for finding a solution, that justifies the use of new methods like polygraphs, brain mapping, and Narco-analysis. The court further stated that it was not possible to claim that the investigating authorities had infringed any Indian citizen's fundamental human rights when such procedures were employed in the presence of experts.

The court upheld the order for conducting test on **Santokben Sharmabhai Jadeja**, observing that when the prosecuting agency determines there is no further progress in the investigation and they are completely in the dark, it is necessary of such a test to determine the truth or apprehend the criminals. If the investigating agency discovers any information based on this revelation that aids in the investigation of the crime, such as records or statements, there would not have been a violation of any rights.

In a similar note, the Court ruled in **State of A.P. v. Inapuri Padma**²¹⁷⁸ that if the appellants are not the accused in the case but have been detained according to a court order, no permission from the court is required if they do not disagree to undergoing a narco-analysis test. If the witnesses refuse to do the test, the police must persuade the court of the specific

events that led them to believe that there is a chance the person who will be subjected to the test knows anything about the crime that was committed.

In the case of **Abhay Singh v. State of U.P.**²¹⁷⁹, Justice Barkat Ali Zaidit stated that if these procedures may be helpful in learning the details of the offence, they should be employed, and the "court should not interfere with the process". The court had to decide whether the accused may be forced to submit to the narco-analysis and brain mapping test against his will. The court ruled that the inquiry and all measures must be done to identify the true criminal because the escape of one guilty person is the hope of a million others to commit the similar act.

The above analysis shows that the Courts including the Supreme Court has never outright prohibited the use of narcotics analysis tests to aid in investigation. The usage of these scientific methodologies has been outlined by numerous committees and commissions. Overall, the Indian judiciary has approved the use of these tests to uncover the truth under certain conditions.²¹⁸⁰

CONCLUSION

Police investigations serve as the backbone of the criminal justice system in India. When a crime is reported to the police, it is their responsibility to find the offender and present the evidence to the court of justice to fulfil the objective of justice. In today's era, this is a rare phenomenon. The reason for this is that criminals have evolved as they adopt new and improved methods of committing crimes. They hardly ever leave any form of evidence at the crime scene. On the other hand, the investigating agencies are still stuck using the traditional methods and techniques for

²¹⁷⁶ Selvi v. State of Karnataka, AIR 2010 SC 1974.

²¹⁷⁷ Rojo George v. Deputy Superintendent of Police, AIR 1953 SC 131.

²¹⁷⁸ State of A.P. v. Inapuri Padma, (2008) Cril.J 3992 (AP).

²¹⁷⁹ Abhay Singh v. State of U.P., 2009 Cril.J 2189 (All).

²¹⁸⁰ Ajay Kr. Barnwal & Dr.S.N Ambedkar, *Narco-analysis Test: An analysis of various Judgements of Indian Judiciary*, 19 IOSR Journal of Humanities and Social Science, 52-57 (2014), <https://www.iosrjournals.org/iosr-jhss/papers/Vol19-issue10/Version-1/H0191015257.pdf> (last visited Oct 1, 2022).

investigation. Third-degree torture is frequently used by police to obtain information. They frequently attempt to conceal the truth and falsify cases for a variety of reasons such as political pressure or corruption. As a result, there are more and more custodial atrocities and deaths. Additionally, when criminals commit crimes but leave no traces of them, they are exempt from punishment because there is not enough concrete evidence to prove their guilt. Further in cases where victims and witnesses become hostile, the judiciary has no other way but to provide the accused the "benefit of the doubt" and free him, which encourages crime and jeopardizes victim, victim's family, and credibility of criminal justice system.

It is commonly known that modern scientific technology aids in the detection of fraud, crime, and criminal activity and may have an impact on the criminal justice system. Although the Indian courts have not yet decided regarding its acceptance, it is true that this kind of scientific test does offer some proof or a hint about the guilt of the accused, which may support other oral testimonies. The legal application of "polygraph, brain mapping, and narco-analysis" should be approved by the courts. Narcoanalysis is an effective tool in criminal investigation as it may result in the collecting of further evidence based on what was discovered during such an investigation, it serves as a crucial foundation for subsequent research.

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