
INTERNATIONAL JOURNAL OF ADVANCED LEGAL RESEARCH

**ADMISSIBILITY OF FORENSIC EVIDENCE UNDER THE
BHARATHIYA SAKSHYA ADHINIYAM: CHALLENGES AND JUDICIAL
TRENDS**- Lakshmi A R¹**Introduction:**

Forensic evidence has become an essential tool in modern criminal justice systems, providing scientific objectivity in the process of crime detection and adjudication. It aids the judiciary in ascertaining facts beyond reasonable doubt, especially when human testimony is unreliable or insufficient.² The growing dependence on forensic science ranging from DNA analysis and fingerprinting to digital and cyber forensics reflects the transition of law from subjective evaluation to empirical validation.³ This shift underscores the need to balance the reliability of scientific techniques with adherence to established legal safeguards, ensuring that technological progress does not override procedural fairness.

Despite these advancements, the admissibility of forensic evidence in Indian courts remains inconsistent and often contested.⁴ *The Indian Evidence Act, 1872*, primarily through Sections 45 to 51, governs the use of expert opinion,⁵ Now in *Bharathiya Sakhya Adhiniyam 2023* section 39 to 45 governs the use of expert opinion, but its application to modern forensic techniques presents interpretative challenges.⁶ Judicial discretion in evaluating expert testimony has led to varying precedents, creating uncertainty about evidentiary standards.⁷ Courts have recognized

¹ Student at India International University of Legal Education and Research

² Ratanlal and Dhirajlal, *The Law of Evidence* (27th edn, LexisNexis 2023) 472.

³ Avtar Singh, *Principles of the Law of Evidence* (24th edn, Eastern Book Company 2022) 315.

⁴ *State of H.P. v Jai Lal* (1999) 7 SCC 280.

⁵ Indian Evidence act, 1872 sec 45-51.

⁶ *Bharathiya Sakhya Adhiniyam 2023*, sec 39-45.

⁷ *Anvar P.V. v P.K. Basheer* (2014) 10 SCC 473.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

the importance of scientific evidence but have simultaneously cautioned against blind reliance without proper corroboration or authentication.⁸

The relevance of this study lies in addressing the gap between scientific potential and legal implementation. In a system striving for fairness, reliability, and justice, the evaluation of forensic evidence determines not just the outcome of individual trials but also the credibility of the justice process itself.⁹ This research, therefore, seeks to analyze the statutory provisions, judicial trends, and challenges associated with the admissibility of forensic evidence in India, while proposing recommendations to strengthen the evidentiary framework.

Research Objectives:

1. To analyze the statutory framework governing the admissibility of forensic evidence under the *Bharathiya Sakshya Adhiniyam, 2023*.
2. To examine key judicial pronouncements and evolving trends in the admissibility of forensic evidence.
3. To identify the challenges and limitations faced in the admissibility and evaluation of forensic evidence in India.
4. To suggest reforms and legal measures for improving the reliability and consistency of forensic evidence in court.

Research Questions:

1. How does the *Bharatiya Sakshya Adhiniyam, 2023* regulate the admissibility of forensic evidence in Indian courts?
2. What are the key judicial interpretations and evolving trends concerning the admissibility and evidentiary value of forensic evidence in India?
3. What practical and legal challenges affect the evaluation and reliability of forensic evidence in the Indian judicial system?
4. What reforms or legal measures can be introduced to enhance the consistency, reliability, and scientific accuracy of forensic evidence in judicial proceedings?

⁸*Mukesh and Anr v State (NCT of Delhi)* (2017) 6 SCC 1.

⁹Law Commission of India, *Report No. 271: Human DNA Profiling – A Draft Bill for the Use and Regulation of DNA-based Technology* (2017).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

Hypothesis:

- The admissibility of forensic evidence under the *Bharathiya Sakshya Adhiniyam* lacks uniform standards of evaluation, leading to inconsistent judicial outcomes.

Scope and Limitations:

This study primarily focuses on the concept, application, and admissibility of forensic evidence within the framework of the *Bharathiya Sakshya Adhiniyam, 2023*. It undertakes a detailed examination of relevant judicial precedents delivered by Indian courts to understand the evolving interpretation and treatment of forensic evidence in legal proceedings. Additionally, comparative references have been drawn from other jurisdictions, particularly the United States and the United Kingdom, to provide a broader perspective on international practices and standards concerning the admissibility of scientific and forensic evidence.

The scope of this research is confined to a doctrinal and analytical examination of statutes, case laws, and scholars writings. The study does not include empirical data and field interviews which could have provided an on-ground perspective on the functioning and challenges of forensic evidence in India. As such, the conclusions are derived primarily from secondary sources and existing legal literature.

Concept and legal framework of forensic evidence:

In India, evidence refers to any statement, document, or material object presented before a court to establish the truth of facts in issue, as defined under Section 2(1)(e) of the *Bharatiya Sakshya Adhiniyam, 2023*.¹⁰ Forensic evidence refers to scientifically derived information used to assist the court in determining facts in issue. The concept of forensic evidence is not explicitly mentioned in BSA, but implicitly covered under provisions that deal with expert opinions and scientific or technical evidence. It bridges the gap between law and science, offering objective insights that enhance the evidentiary process. Section 39-45 of Bharathiya Sakshya Adhiniyam deals with opinions of third persons when relevant. Section 39 which deals specifically with the opinions of experts, when the Court has to form an opinion upon a point of foreign law or of

¹⁰ Bharatiya Sakshya Adhiniyam 2023, s 2(1)(e).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

science or art, or any other field, or as to identity of handwriting or finger impressions, the opinions upon that point of persons specially skilled in such foreign law, science or art, or any other field, or in questions as to identity of handwriting or finger impressions are relevant facts and such persons are called experts.¹¹ This is directly connected to the use and admissibility of forensic evidence in legal proceedings. Section 41 is also closely linked to forensic document examination, a key branch of forensic evidence. When the court must determine who wrote or signed a document, it can rely on the opinion of a person familiar with the handwriting or a forensic handwriting expert.¹² Such experts use scientific techniques like stroke comparison, ink analysis, and microscopic examination to verify authenticity or detect forgery. Hence, this section forms the legal foundation for admitting forensic handwriting analysis as relevant evidence in identifying the author or authenticity of a document.

The major types of forensic evidence include DNA profiling, serology, odontology, fingerprint, ballistic, toxicology, narco analysis and polygraph. DNA Profiling is a forensic technique which helps in criminal investigation by comparing the DNA evidence to the criminal suspects. Forensic serology, in terms of law and law enforcement, is a branch of forensic science dealing with identification and characterization of biological, evidentiary samples such as blood semen, saliva, sweat, breast milk and any other bodily fluids.¹³

Forensic odontology is a branch of forensic science which deals with the examination and evaluation of dental evidence present at the crime scene; it can be used as evidence to present before the court. From the dental analysis various information can be gathered for example the age, gender, DNA etc. Forensic fingerprint experts collect the samples very carefully as the latent fingerprints are invisible with the naked eye that's why they use powder to discover it and collect it so carefully to examine it further. Now, with the help of digital forensic it became very easy to match the fingerprint via a database created digitally of all the criminals. It helps to connect a person to the crime scene by tracking the record of the criminal.¹⁴ Forensic ballistics is a branch of forensic science which deals with the examination of bullets which help to identify

¹¹Bharatiya Sakshya Adhiniyam 2023, s 39.

¹²Bharatiya Sakshya Adhiniyam 2023, s 41.

¹³ R Li, *Forensic Biology* (CRC Press–Taylor & Francis Group 2015).

¹⁴Verma S, Parvez A and Ashutosh K, 'Forensic Science Application: An Effective Tool of Criminal Investigations' (2022) 7(2) *IP International Journal of Forensic Medicine & Toxicological Sciences* 60–65.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

firearms. A ballistic expert by examining the weapon can find out the type of firearm, identify the firearm, range of firearm and its effects. It plays a very important role in solving the shooting cases and helps to answer the questions like whether the injury caused by the weapon is justified or not, what kind of weapon fired it, what was the possible range of the weapon and who was the shooter.¹⁵ Forensic toxicology is a branch of forensic science which is the study of adverse effects of drugs and chemicals on biological organisms. It also helps to examine the poisons and its effects on the human body. Its main aim is to find out whether a person has died because of poison? Narco analysis is a method used to lower down the inhibitions of a person in which he goes into a sleep-like state where it becomes impossible for him to lie. In this state he will freely share the needed information easily. With the help of experts, the investigating officers can find out the probative truth.¹⁶ According to the orders of court this test is to be video graphed and presented in court as evidence. Polygraph or lie detector test is an examination of a person's mind and body with the help of different sensors which are attached to the accused body with the polygraph machine. These sensors help to investigate the truth. This machine records every detail of a person like his blood pressure, pulse rate and muscle movements. The examiner in this test involves the criminal psychologist who prepares a questionnaire according to the requirements of the investigation.¹⁷

The role of expert witnesses is pivotal, as they aid the court in interpreting technical data beyond a judge's ordinary comprehension. Experts must hold recognized qualifications, professional experience, and impartiality. Indian courts, through judgments such as *State of Himachal Pradesh v Jai Lal*¹⁸, have emphasized that while expert opinions are advisory, they must be supported by credible reasoning and scientific accuracy. Hence, forensic evidence, when properly admitted and evaluated, fortifies the pursuit of justice through scientific precision.

Judicial Interpretation and Trends:

Forensic science, while vital for criminal investigations, raises significant constitutional and ethical concerns in India. The use of scientific techniques such as DNA profiling and narco-

¹⁵ A Kidwai and M Tlukdar, *The Law of Evidence* (University Book House Pvt Ltd 2022).

¹⁶ Ibid 12

¹⁷ R Ramachandranan, *Law of Narco-Analysis: Right against Self-Incrimination* (Kamal Publishers 2018).

¹⁸ *State of Himachal Pradesh v Jai Lal* (1999) 7 SCC 280.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

analysis can conflict with the right against self-incrimination under Article 20(3) of the Constitution and the right to privacy under Article 21. In case of *Selvi v State of Karnataka*,¹⁹ It was held by the Supreme Court that there are limitations of the Narco-Analysis test. It does not have an absolute success rate and there is always the possibility that the subject will not reveal any relevant information. compelling an individual to undergo techniques like lie-detector tests or brain-mapping without consent violates these fundamental rights. Thus, balancing scientific advancement with individual liberties remains crucial to maintaining constitutional integrity and ethical justice.

In case of *Patangi Balarama Venkata Ganesh v state of Andhra Pradesh*,²⁰ The Supreme Court explained the importance of DNA profiling in the following words- “*Deoxyribonucleic acid, which is found in the chromosomes of the cell of living beings, is the blueprint of an individual. DNA decides the characteristics of a person such as the colour of the skin, type of hair, nails and so on. Using this genetic fingerprinting, identification of an individual is done like in the traditional method of identifying fingerprints of offenders. The identification is hundred percent precise, expert opinion.*”

In case of *Rajeshbhai Mujlibhai Patel and Ors v State of Gujarat and Anr.*,²¹ A forgery hand writing expert opined that signatures in all receipts issued by the accused for payment of amount are not matching with the sample signatures of the accused and, thus, based upon his sole opinion a FIR was registered against the accused and, in retaliation accused filed application for quashing of FIR. It was held by the supreme court that under section 45 of *Indian Evidence Act*, the opinion of a handwriting expert is relevant but is not conclusive evidence.

In *Ram Gopal v CBI, Dehradun*,²² The employees of the bank were charged with falsification of accounts, cheating forgery and criminal conspiracy. In this case, it was found that writing on receipt of passbook and cheque book from bank records and signatures on the cheques presented to withdraw cash from the fictitious account are in the handwriting of accused persons impersonating fictitious account holders. Prosecution relied upon the report of a handwriting

¹⁹*Selvi v State of Karnataka* (2010) 7 SCC 263.

²⁰*Pantangi Balarama Venkata Ganesh v State of Andhra Pradesh*, (2009) 14 SCC 607; AIR 2009 SC 3129.

²¹*Rajeshbhai Mujlibhai Patel & Ors v State of Gujarat & Anr* (2020) 11 SCC 106.

²²*Ram Gopal v Central Bureau of Investigation, Dehradun* (2019) 7 SCC 1502.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

expert verifying the aforementioned fact. His report was not challenged by the accused. The Supreme Court held that the conspiracy on the part of the accused person is established.

Mukesh v. State (NCT of Delhi),²³ In this case it was held that the evidence of experts regarding DNA is admissible in evidence in terms of section 45 of the *Indian Evidence Act, 1872*. This is the landmark case in which the admissibility of DNA profiling held relevant under section 39 of *Bharthiya Sakshya Adhiniyam 2023*.

Santosh Kumar Singh Malik v. State of Haryana,²⁴ in this case the young girl was murdered and raped. The High Court relied upon the DNA reports, which was rejected by the Trial Court. Later on the Supreme Court also approved the same and held that the trial court was not justified in rejecting the DNA report, as nothing adverse could be pointed out against the two experts who had submitted it. DNA report as being significantly accurate and is an exact science, said the apex court.

Rajendra Pralhadrao Wasnic v State of Maharashtra,²⁵ It is true that the matching of DNA samples is emerging as a vital tool for linking suspects to the specific criminal acts. But where the sample was taken from the body of the accused and sent for DNA profiling, however, the result of DNA was not produced before the trial court. The Supreme Court held that there is absolutely no explanation for not presenting the DNA report in the trial court from the prosecution side and in the absence of any justification for not producing the DNA evidence it would be dangerous on facts of the case to uphold the sentence of death on the accused person.

In case of *Murari Lal v State of Madhya Pradesh*²⁶ The Supreme Court observed that there is no rule of law nor any rule of prudence which has crystallized into a rule of law that opinion evidence of a handwriting expert must never be acted upon, unless substantially corroborated.

In *Smt Rashmita Vishikeshan Patel v Vivekanand Motilal Patel*,²⁷ It was held by the court that it is not necessary to examine the handwriting of an expert in all cases and his opinion with sufficient corroboration can be relied upon in the view of the provisions contained in section 45

²³*Mukesh & Anr v State for NCT of Delhi & Ors* (2017) 6 SCC 1.

²⁴*Santosh Kumar Singh v State* (2010) 9 SCC 747.

²⁵*Rajendra Pralhadrao Wasnic v State of Maharashtra* (2019) 12 SCC 460.

²⁶*Murari Lal S/o Ram Singh v State of Madhya Pradesh* (1979) 3 SCC 612; 1980 AIR 531; (1980) 2 SCR 249

²⁷*Smt Rashmita Vishikeshan Patel v Vivekanand Motilal Patel* AIR 2020 Chh 50.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

(section 51) and section 73(section 73A) of *Indian Evidence Act, 1872*(*Bharatiya ShaksyaAdhinyam, 2023*).

In *Nandlal Wasudeo Badwaik v. Lata Nandlal Badwaik*,²⁸ The appellant, the father of the child born to his wife, questioned the paternity of the child on the ground that his wife did not stay with him for the last two years. The court directed a DNA test. The DNA result in the appellant was not the biological father of the child. The Supreme Court held that the husband's plea that he had no access to the wife when the child was begotten stands proved by the DNA test report and in the face of it, the court can not compel the father/ appellant to bear the fatherhood of the child when the scientific reports prove to the contrary. But the Supreme Court also observed that, we are conscious that an innocent child may not be bastardized as the marriage between her mother and father was subsisting at the time of her birth, but in view of DNA test reports what we have observed above, we can not forestall the consequence. It is denying the truth. Truth must triumph is the hallmark of justice.

Nano- forensics is a completely new area of forensic science associated with the development of Nano sensors, Nano technical methods for real-time crime scene investigation. Application of nanotechnology is likely to enhance the capacity to toxic materials, forensic evidence in tissue, materials and soil.²⁹ It mainly deals with the identification, evaluation, investigation of crime and finding connections between pieces of evidence. It helps to detect the crime. It is most effectively used in the discipline of forensic toxicology for examination of different toxic materials from forensic evidences like hair, blood, saliva and others. Gold nanoparticles, silver nanoparticles and titanium oxide nanoparticles help to enhance the detection limit. It is also used in DNA Analysis, Fingerprint Analysis, Explosives Detection and Ballistics forensics. Other fields of forensics are also available which helps in criminal investigation. For example, Digital Forensics, Psychiatry forensics etc. Ear print analysis and the Video Spectral Comparator (VSC 2000) represent innovative advances in forensic science. Ear print analysis is based on the uniqueness of each person's ear structure; when pressed against a surface, it leaves a distinctive two-dimensional print that can help identify suspects. The VSC 2000, on the other hand, is a

²⁸*Nandlal Wasudeo Badwaik v Lata Nandlal Badwaik & Anr* (2014) 2 SCC 576

²⁹ Ibid12

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

sophisticated instrument used in document examination.³⁰ It employs video spectral imaging with varied light sources and filters across visible, ultraviolet, and infrared ranges to reveal hidden writings, detect paper quality, and identify alterations or forgeries without damaging the original document.

Challenges in Admissibility:

Despite the significant benefits of forensic science in the criminal justice system, its effectiveness in India is hindered by several persistent challenges. One of the primary issues is the lack of adequate infrastructure and skilled manpower. India has a limited number of forensic laboratories, many of which operate with outdated equipment and lack access to advanced forensic technologies. The shortage of trained forensic experts further aggravates the problem, resulting in an overburdened system that struggles to deliver timely and accurate results. Consequently, there is a substantial backlog of cases awaiting forensic examination. Thousands of criminal cases remain pending due to limited forensic facilities, and delays in DNA and ballistic reports weaken the efficiency of law enforcement agencies, often leading to prolonged judicial proceedings.³¹ Another major concern is the admissibility and reliability of forensic evidence in courts. Forensic evidence is sometimes challenged due to improper handling or contamination at crime scenes, and despite judicial insistence on strict adherence to forensic protocols, lapses in evidence collection, preservation, and documentation are frequent. Furthermore, India currently lacks a comprehensive forensic law that governs the processes of forensic investigation and evidence collection. The absence of such a legal framework, coupled with inadequate training and forensic awareness among law enforcement officers and members of the judiciary, hampers the effective integration of scientific methods into legal proceedings. Hence, there is an urgent need for stronger legislation and capacity-building measures to ensure that forensic science serves as a reliable and efficient tool in the administration of justice.

Comparative Perspective:

³⁰ Ibid12

³¹Tripathi UM, 'The Role of Forensic Science in Strengthening Criminal Investigations: Challenges and Future Prospects in India' (2025) 2(3) *The Infinite: An Online Peer Reviewed / Refereed Journal*<www.theinfinite.in> accessed 28 October 2025.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

A comparative analysis of forensic evidence admissibility highlights key lessons India can adopt from other jurisdictions. In the United States, the admissibility of expert and scientific evidence is governed by the Daubert Standard, established in *Daubert v Merrell Dow Pharmaceuticals Inc*, where the Supreme Court held that evidence must be both relevant and reliable. Courts assess factors such as peer review, testability, known error rates, and general acceptance within the scientific community.³² This approach ensures that only scientifically valid and rigorously tested methods are admitted in court. In contrast, the United Kingdom follows the Criminal Practice Directions and Criminal Procedure Rules, which emphasize the competence, independence, and objectivity of expert witnesses.³³ These rules require experts to provide unbiased opinions and disclose any limitations in their findings. India, while guided by Sections 39-45 of the BSA 2023,³⁴ lacks a uniform framework to assess the reliability of forensic techniques. Adopting a hybrid model inspired by the Daubert principles and UK standards could help Indian courts establish clearer benchmarks for expert testimony, enhance the credibility of forensic evidence, and prevent wrongful convictions resulting from unverified or pseudo-scientific methods.³⁵

Conclusion:

In the end, we can say that science and technology has been making an inroad in every field of life and the law field is no exception to it. However, scientific evidence does not get the clear cut confidence of courts in various parts of the world. Yet, many fields of forensics like finger prints, DNA, Nano Technology have emerged as reliable factors in the eyes of the courts. Ear printing and Brain finger printing, are still developing and may in future be proved as very efficient in crime detection. Video Spectral Comparator is also very helpful in comparing data. In future it would be impossible to solve the crime and to find out the criminal without applying these techniques. Day by day new technological developments are taking place. So there is a need to apply such techniques so that the society could be protected from commission of the crime and if a crime committed by any person, he could be punished. Even though these scientific techniques

³²*Daubert v Merrell Dow Pharmaceuticals Inc* 509 US 579 (1993).

³³Criminal Practice Directions 2015 [CPD V Evidence 19A Expert Evidence] (UK).

³⁴Bharatiya Sakshya Adhiniyam 2023, s 39-45.

³⁵A Kumari, 'Admissibility and Evidentiary Value of Forensic Evidence in India' (2023) 5(2) *Indian Journal of Law and Legal Research* 1.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

are proving very helpful to society as well as the criminal justice system, there are also some bad consequences of application of these techniques. Little bit temperament with the scientific evidence reverses the result of finding the crime. The study confirms the hypothesis that the admissibility of forensic evidence under Indian law lacks uniform standards, leading to inconsistent judicial outcomes. Although the *Bharatiya Sakshya Adhiniyam, 2023* and judicial precedents acknowledge the importance of expert opinions, variations in interpretation, inadequate infrastructure, and lack of proper training weaken its effectiveness. Comparative insights from the U.S. and U.K. highlight the need for clearer reliability tests and expert accountability. Strengthening forensic legislation, ensuring scientific accuracy, and enhancing institutional capacity can make forensic evidence a more consistent and trustworthy tool in the Indian justice system.

Suggestions:

There is a need to Strengthen forensic infrastructure by setting up state-of-the-art laboratories across India. Increasing the number of regional forensic labs to reduce case backlogs and expedite forensic analysis. By introducing forensic training programs for police officers, prosecutors, and judges the efficacy of forensic admissibility will develop accordingly. The government has to give more preference on encouraging forensic science education and specialization in Indian universities. Artificial Intelligence can enhance forensic analysis by automating fingerprint matching, DNA sequencing, and crime pattern detection. Machine learning models can help predict criminal behavior using forensic data. Enactment of a Forensic Evidence Act to regulate forensic practices and ensure the credibility of forensic evidence in courts. Implementation of national forensic standards to improve the reliability of forensic investigations. Collaborating with private forensic institutions and global forensic experts for knowledge sharing. Promoting research and development in forensic science through government funding and industry partnerships.

Bibliography:

Books:

1. Avtar Singh, *Principles of the Law of Evidence* (24th edn, Eastern Book Company 2022).
2. Ratanlal and Dhirajlal, *The Law of Evidence* (27th edn, LexisNexis 2023).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

3. Li R, *Forensic Biology* (CRC Press–Taylor & Francis Group, New York, 2015).
4. Kidwai A and Tlukdar M, *The Law of Evidence* (University Book House Pvt Ltd, Jaipur, 2022).
5. Ramachandranan R, *Law of Narco-Analysis: Right against Self-Incrimination* (Kamal Publishers, New Delhi, 2018).

Articles and Online Journals:

1. Verma S, Parvez A and Ashutosh K, 'Forensic Science Application: An Effective Tool of Criminal Investigations' (2022) 7(2) *IP International Journal of Forensic Medicine & Toxicological Sciences* 60–65.
2. Tripathi UM, 'The Role of Forensic Science in Strengthening Criminal Investigations: Challenges and Future Prospects in India' (2025) 2(3) *The Infinite: An Online Peer Reviewed / Refereed Journal* <www.theinfinite.in> accessed 28 October 2025.
3. Kumari A, 'Admissibility and Evidentiary Value of Forensic Evidence in India' (2023) 5(2) *Indian Journal of Law and Legal Research* 1.

Law Reports:

1. Law Commission of India, *Report No. 271: Human DNA Profiling – A Draft Bill for the Use and Regulation of DNA-based Technology* (2017).
2. Criminal Practice Directions 2015 [CPD V Evidence 19A Expert Evidence] (UK).

Statutory provisions:

1. The Indian Evidence Act 1872.
2. Bharathiya Shakya Adhinyam 2023.

Cases:

1. *Mukesh and Anr v State (NCT of Delhi)* (2017) 6 SCC 1.
2. *Anvar P.V. v P.K. Basheer* (2014) 10 SCC 473.
3. *State of H.P. v Jai Lal* (1999) 7 SCC 280.
4. *Selvi v State of Karnataka* (2010) 7 SCC 263.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com
<https://www.ijalr.in/>

5. *Rajeshbhai Mujlibhai Patel & Ors v State of Gujarat & Anr* (2020) 11 SCC 106.
6. *Ram Gopal v Central Bureau of Investigation, Dehradun* (2019) 7 SCC 1502.
7. *Mukesh & Anr v State for NCT of Delhi & Ors* (2017) 6 SCC 1.
8. *Santosh Kumar Singh v State* (2010) 9 SCC 747.
9. *Rajendra Pralhadrao Wasnik v State of Maharashtra* (2019) 12 SCC 460.
10. *Murari Lal S/o Ram Singh v State of Madhya Pradesh* (1979) 3 SCC 612; 1980 AIR 531; (1980) 2 SCR 249
11. *Nandlal Wasudeo Badwaik v Lata Nandlal Badwaik & Anr* (2014) 2 SCC 576
12. *Smt Rashmita Vishikeshan Patel v Vivekanand Motilal Patel* AIR 2020 Chh 50.
13. *Daubert v Merrell Dow Pharmaceuticals Inc* 509 US 579 (1993).
14. *Pantangi Balarama Venkata Ganesh v State of Andhra Pradesh*, (2009) 14 SCC 607; AIR 2009 SC 3129.