

LEGAL LOCK JOURNAL

2583-0384

VOLUME 4 || ISSUE 4

2025

This Article is brought to you for “free” and “open access” by the Legal Lock Journal. It has been accepted for inclusion in the Journal after due review.

To submit your Manuscript for Publication at Legal Lock Journal, kindly email your Manuscript at legallockjournal@gmail.com.

A STUDY ON PROTECTION OF WITNESS - NEED FOR CRIMINAL JUSTICE SYSTEM.

Sandhiya shree. U¹

Abstract:

Conducting a study on protection of witness which indeed is a major problem that has been faced during criminal trials. A witness is a person who saw or heard the crime, testifies and provides evidence in court. Their protection is very important as they play a vital role in delivering justice to victims. The main issue of this research was to find the problem faced by witnesses. Different articles and books were referred for Review of literature relating to witness protection, which brought in different perspectives about the same. This research is an empirical type of research. The total Number of responses collected were 213 responses. Simple random sampling method is used here to collect the samples. The sample is collected from the general public both through online mode and direct survey method. The independent variables used in the research are age, gender, etc and Witness protection laws and their implementation in India, reason for the witnesses turning hostile during trial, Absence of police protection during and after the trial and etc are the dependent variables used. Also have used statistical tools to interpret my data. Further, I have given some solutions to eradicate this issue and have concluded with my finds from this research on witness protection.

Keywords:

Witness, trial, criminal justice, protection, hostile, dignity.

Introduction:

Witnesses play an important role in justice administration system in any country. Their role in a criminal trial is indispensable as their evidence before the Court of law can change the entire direction of a case. According to Jeremy Bentham “witnesses are the eyes and ears of justice”. However the word witness has no proper definition. Each and every statement is very important as it has a magic force to change the course of the whole case. In India, justice is administered through an adversarial system in which witnesses actively engage in the trial process. Since witnesses are important to produce in the trial process, it is the duty of the

¹The author is a student at Saveetha school of law, Saveetha Institute of Medical and Technical Sciences (SIMATS).

court to provide protection to them because they are the part of evidence in any criminal case. Although few states like National Capital Territory of Delhi and Maharashtra have their own witness protection law governing in their states. However, there was no central law on witness protection in India. Witnesses are recognised as one of the most important components of the criminal justice system. It is because of them that the trial is able to reach a reasonable result. However, the laws relating to the protection of witnesses is inadequate and also the need for a witness protection programme in India is highly required for safeguarding them. The Criminal Code Procedure do not include any such sections for the protection of witnesses which is another problem. There are some of the major problems faced by the witnesses.

The Supreme Court (SC) has approved India's First Witness Protection Scheme drafted by the union government and has asked the Centre, states and Union Territories to enforce it in letter and spirit. The Scheme was drawn up by the Centre in 2018 with inputs from states/Union Territories, National Legal Services Authorities, civil society, High Courts and police personnel. The point and objective of the scheme are to guarantee that the examination, indictment, and preliminary of criminal offences isn't biased on the grounds that witnesses are threatened or terrified to give proof without protection from savage or other criminal recrimination.

The United States has the regulations on "Witness Protection" which the vast majority of the nations don't have. From the counteraction of witness intimidation, to keeping up with the situation where a person's name is not known are probably the main parts of "Witness Protection" gives that the "Witness Protection Programs" in the conscious upon and that also is done completely and broadly managed. In the United States, there is an exceptionally successful Witness Protection Program.

Witness protection is one of the characteristics of a fair trial mandated by Article 21 of the Indian Constitution. However, under our justice administration system, the witness's situation is still deteriorating. When witnesses testify against the accused, they are persuaded, intimidated, and threatened. Furthermore, witnesses are even killed if they speak out against the accused. All of these instances of torture occurred primarily as a result of our country's lack of an efficient witness protection mechanism. As a result, criminals have no fear of the law allowing them to threaten witnesses. This has also resulted in a high percentage of acquittal and a decline in convictions in the justice administration system. There are many statutes that deals with the concept witnesses. Sections 151 and 152 of the Indian Evidence

Act, 1872 protect the witnesses from being asked indecent, scandalous, offensive questions, and questions which intend to annoy or insult them. Under Section 312 of Cr.P.C. a criminal court may order payment of reasonable expenses of any complainant or witness attending for the reason of any investigation, criminal trial or other proceeding before such Court. Section 195A of the Indian Penal Code penalises threatening or inducing any person to give false evidence. The aim of this research is to understand the consequences that a witness goes through in trial.

Objectives:

1. To know about the perception of general public towards witnesses
2. To know about problems faced by witnesses.
3. To determine the safety of the witnesses.
4. To identify the reasons for witnesses turning hostile.
5. To Find ways to eradicate witnesses from turning hostile.

Review of literature:

Bhosale Rakesh Arvind (2022) Witness is significant piece of the case, yet he needs to deal with specific issues from introductory phase of the case till the finish of the preliminary. Numerous issues he needs to confront Though he has no private worry with the offence or wrongdoing yet he needs to experience everything since he has turned into a piece of the wrongdoing or rate which he has seen or he has presented under the watchful eye of court on the decent date on his own expense. Remembering the certified issues of witness the state needs to take endeavours to tackle the issues and assist witnesses with showing up under the steady gaze of court unafraid. **Gupta, Devang Phone (2021)** - this paper expects to dissect the issues of hostile witnesses and their impact on equity. It endeavoured to know why and in what conditions the witnesses turned hostile. The paper furthermore basically audits witness protection in the illumination of huge legitimate arrangements and the viewpoints of the legal executive in safeguarding the witness. **Mehak Dhiman and Ayesha Adyasha (2021)** This paper means to examine the job of the legal executive in safeguarding a hostile witness. It analyzes the issues of hostile witnesses and their effect on the equity framework. It endeavoured to be aware concerning why and in what conditions the witnesses turned hostile. The paper additionally basically audits witness protection in the radiance of important lawful arrangements and the perspectives on the legal executive in safeguarding the witnesses. **Pritam Ghosh (2013)** This examination paper basically investigates the above issue and

attempts to recommend that the essential solution for this issue is contriving adequate casualty and witness protection measures, which can be carried out, principally through the sanctioning of a different witness protection regulation. The items in this regulation ought to be formed after a cautious investigation of comparable regulations, working in different nations.

Maria H. Sanchez (2012) Paper give data in regards to master declaration in monetary extortion cases. Monetary extortion, including charge misrepresentation, is on the ascent, as is the interest for master witness declaration for both the examiners and the guard group when these cheats are arraigned. Paper detail the job and capabilities of the bookkeeping master witness and Paper give instances of two high profile extortion cases in which master declaration of bookkeepers was utilised. This article ought to hold any importance with lawyers, bookkeepers, scholastics and understudies. **Rustam Singh Thakur (2011)** The role of a witness is vital in a preliminary. He is a fundamental piece of the equity conveyance arrangement of any country. Witnesses assume a significant part in the law enforcement arrangement of any country. As indicated by Bentham, witnesses are the eyes and ears of equity. Subsequently, the significance and supremacy of the nature of preliminary. **Parakh (2011)** Expert evidence assumes a vital part in shielding any medico legitimate case. Since judges don't, and are not supposed to have the information on clinical issues, they take help of specialists in specialised matters. regularly the cases are lost since Expert evidence isn't created under the steady gaze of the court. This is because of the obliviousness of the way that creating master proof is the right and honour of both the gatherings to a suit. **Richard A. Leo & Alexa Koenig (2010)** Perhaps more significantly, in the more than fifty years since *Miranda v. Arizona* was decided, the United States Supreme Court has destroyed its doctrinal foundation.

Saul M. Kassin (2010) From the 1990s to the present, American police interrogation methods and practices have again become controversial due to problem of police-induced false confessions – widely publicized and well documented by both DNA and non-DNA exonerations that often lead to the wrongful conviction of the innocent. **Nina Puren (2009)** Torture testimony in the trail on witness inhabits the shadowy interval between knowledge and acknowledgement, despite the growing number of detainees who allege that they have suffered serious human rights violations while in US custody. the operation of the hostile witness a form of the second person committed to discrediting rather than enabling traumatic narratives; and systematic attacks on detainees as speaking subjects, evident at the level of rhetoric and law. **Berti, Daniela. (2009)** The Doctrinal method was followed for conducting

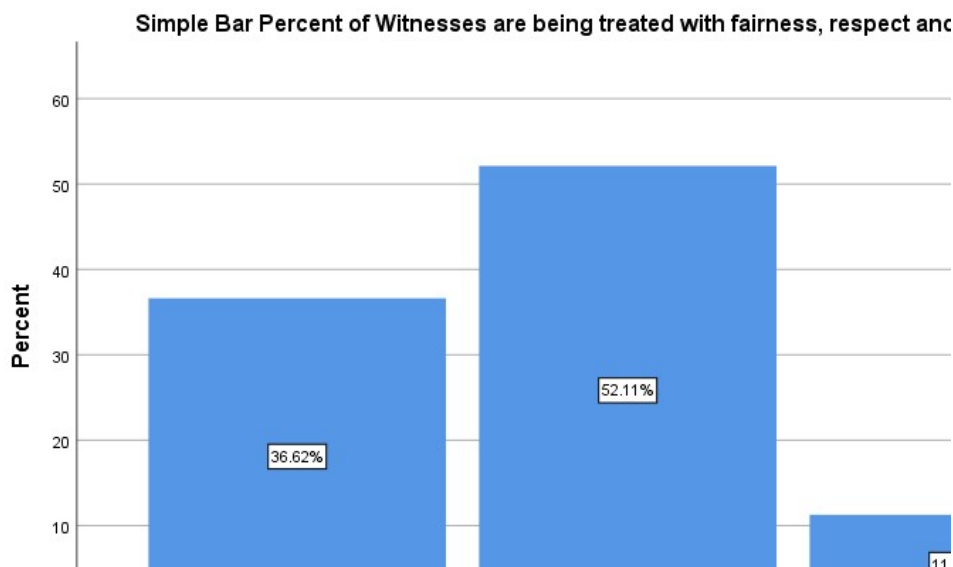
research on the witness. The kind Torture testimony in the path on witness possesses the shadowy stretch among information and affirmation, in spite of the developing number of prisoners who charge that they have experienced serious common liberties infringement while in US guardianship. the activity of the 'hostile witness', a type of the subsequent individual focused on ruining as opposed to empowering horrendous stories; and efficient assaults on prisoners as talking subjects, obvious at the degree of manner of speaking and regulation.

C. R. Williams (2009) The paper deals that courts rely vigorously upon the declaration of witnesses. The reliable data given by the witness helps the court in arriving at the right case resolutions. They act as a reminder for the adjudicators. Subsequently, in a preliminary, the job of a witness is significant. He is an important part of each and every enlightened society's legal framework. **Garrett (2008)** The steady stream of post-conviction DNA exonerations in the last two decades has begun to transform this perception. Indeed, these cases have established the leading causes of error in the criminal justice system to be eyewitness misidentification, faulty forensic science, false informant testimony, and false confessions. **Garrett (2008)**. In 1989, Gary Dotson was the first wrongfully convicted individual to be proven innocent through the then-new science of DNA testing. Almost two decades later, more than 200 individuals have been exonerated by post-conviction DNA testing and released from prison, some from death row. **Newton (2008)** In a more recent study of Icelandic inmates, the rate of self reported false confessions had increased.

Kassin (2007) In a North American survey of 631 police investigators, respondents estimated from their own experience that 4.78% of innocent suspects confess during interrogation. **Bond (2006)** It is not surprising as an empirical matter that lay people on average are only 54% accurate at distinguishing truth and deception; that training does not produce reliable improvement; and that police investigators, judges, customs inspectors, and other professionals perform only slightly better, if at all albeit with high levels of confidence. **Borchard (2005)** Post-conviction DNA tests and exonerations have offered a window into the causes of wrongful conviction. Researchers and legal scholars have long documented the problem and its sources of error. **Gudjonsson (2004)** While other problems have been revealed—for example, involving flaws in various forensic sciences -- the number of cases involving confessions—long considered the “gold standard” in evidence—has proved surprising. **Sanders (2002)** A disturbing number of these have occurred in high-profile cases, such as New York City’s Central Park Jogger case, where five false confessions were taken within a single investigation.

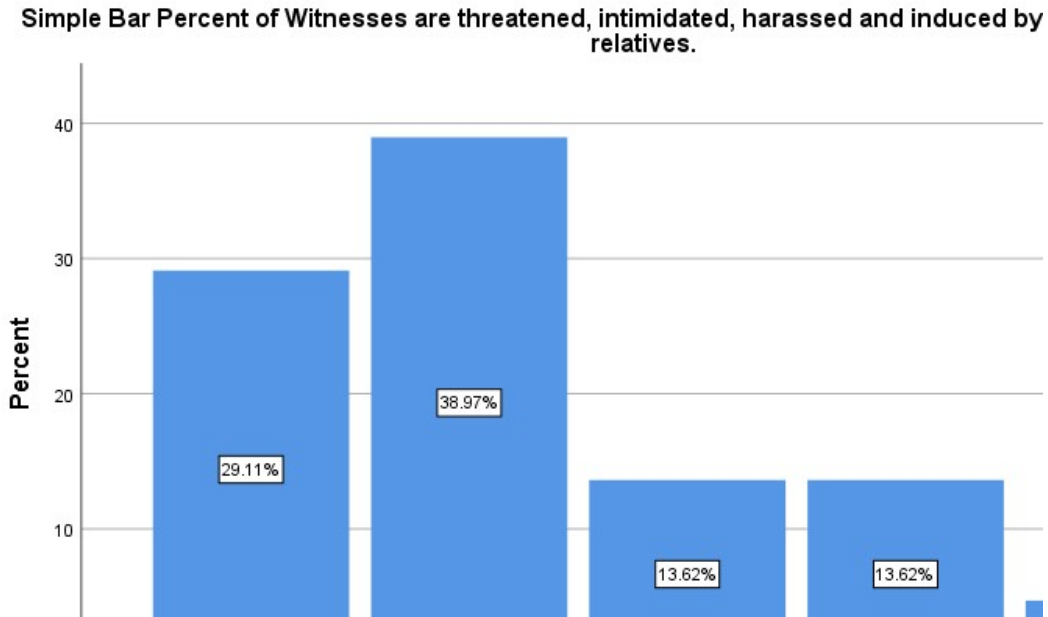
Methodology:

This study is based on primary and secondary data of income tax rates and slabs. Here secondary data is collected from article's, books, online sources and literature part of Books And primary data is collected from 213 sample respondents. The type of research used is Empirical research, Sampling method followed in this research is Convenient Sampling. Research instrument used for primary data is a well structured questionnaire. Independent variables used in this research are age, gender, education qualifications, occupation and locality. The Dependent variable is Witnesses are threatened, intimidated, harassed and induced by the accused to his relatives, Improper protection to witnesses creates hesitate to come forward to support the court during the trial, Absence of police protection during and after the trial, Witness protection laws and their implementation in India and reason for the witnesses turning hostile during trial. This study used a percentage bar chart, clustered bar chart and Chi-Square test to interpret the data.

Analysis:**Figure-1**

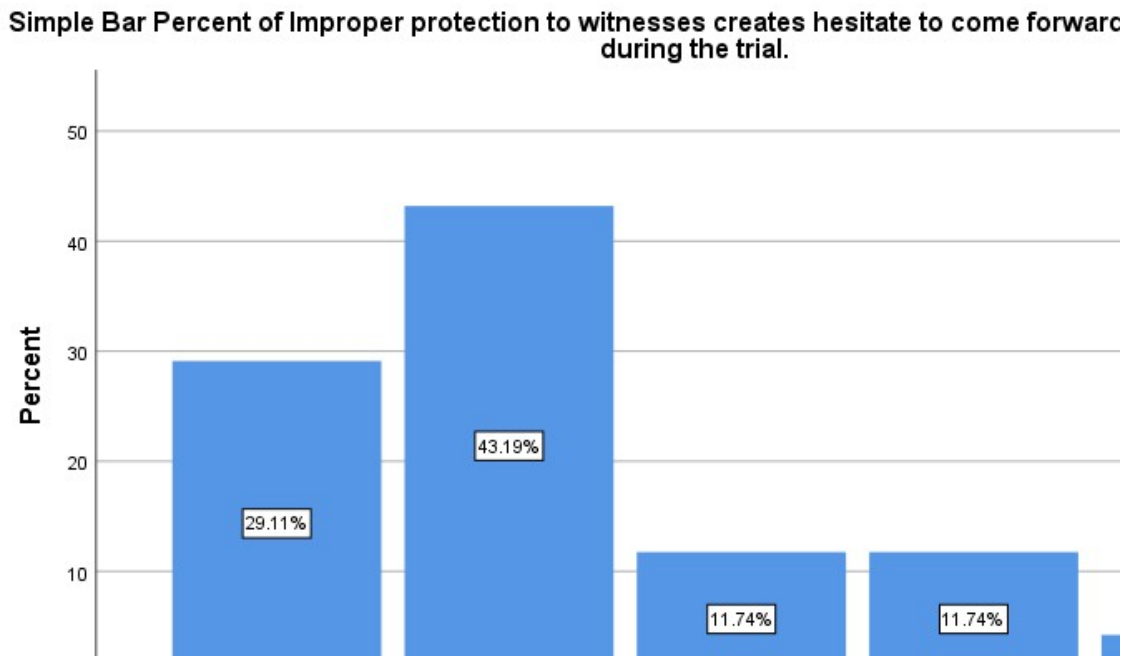
Legend: Figure 1 shows the percentage of Witnesses are being treated with fairness, respect and dignity

Figure-2

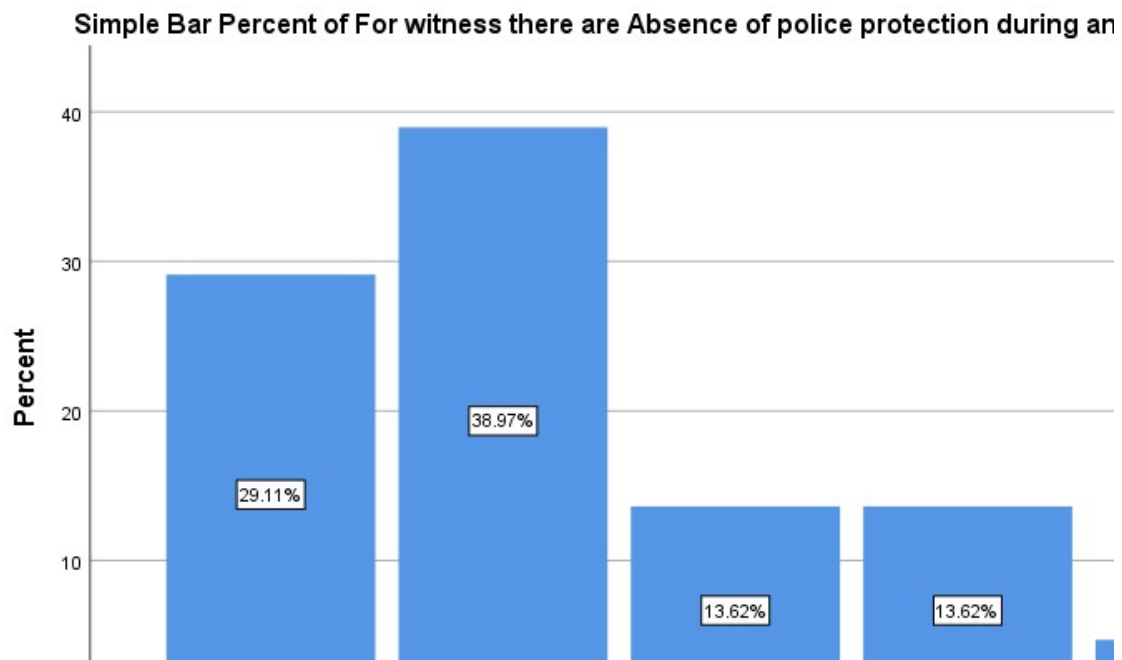


Legend: Figure 2 shows the percentage of Witnesses are threatened, intimidated, harassed and induced by the accused to his relatives.

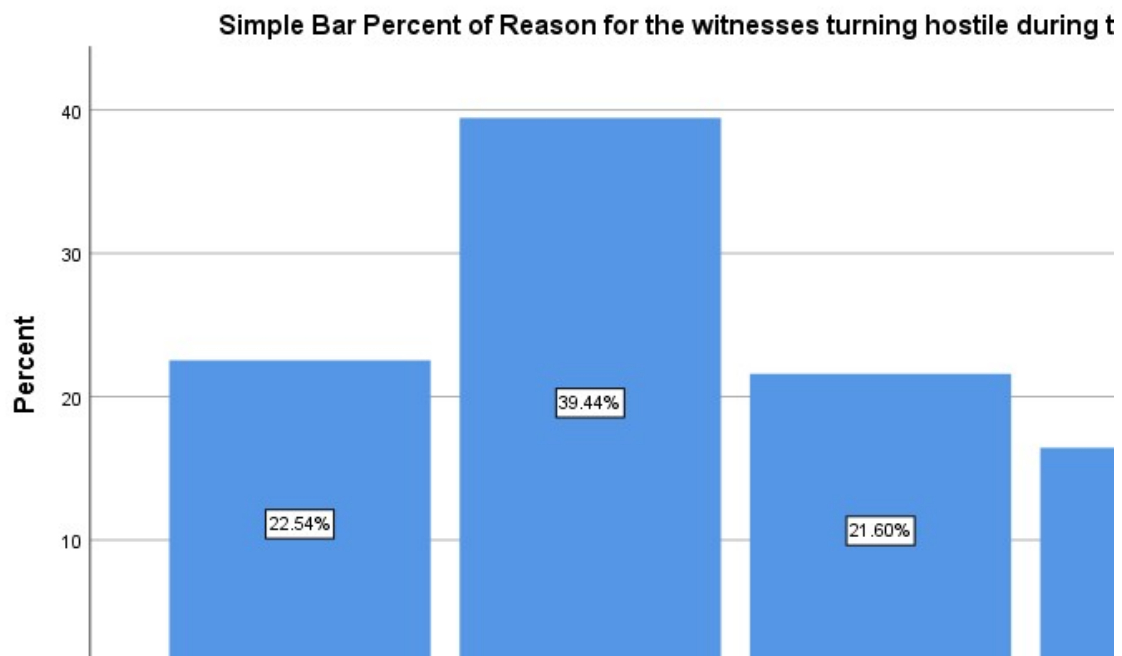
Figure-3



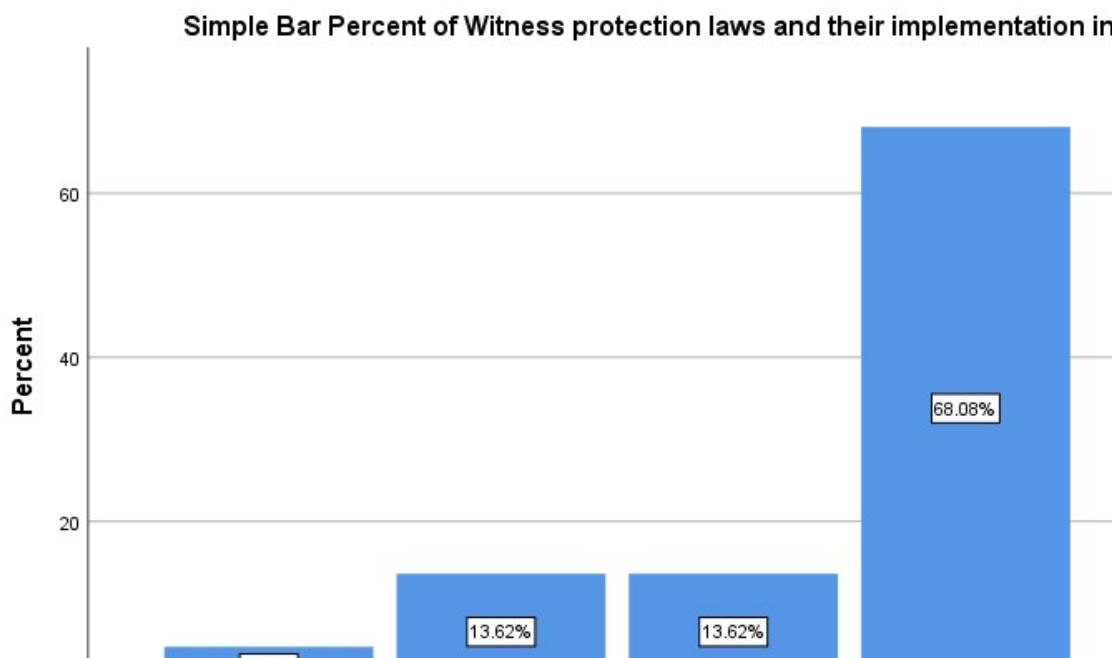
Legend: Figure 3 shows the percentage of Improper protection to witnesses creates hesitate to come forward to support the court during the trial.

Figure-4

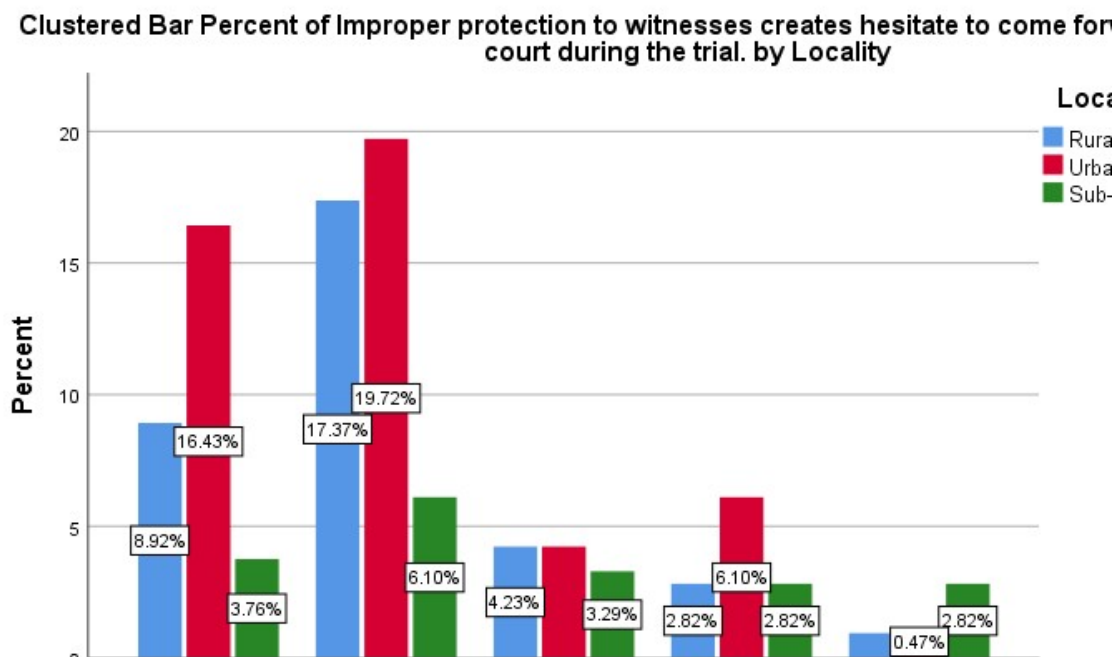
Legend: Figure 4 shows the percentage of witness there are Absence of police protection during and after the trial.

Figure-5

Legend: Figure 5 shows the percentage of reason for the witnesses turning hostile during trial.

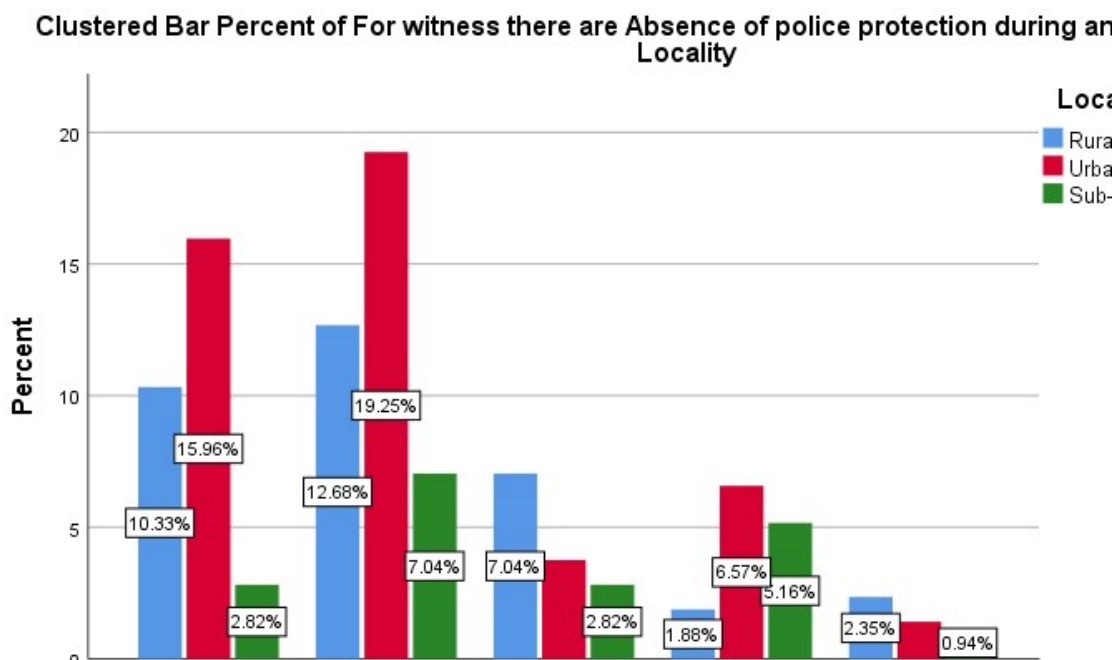
Figure-6

Legend: Figure 6 shows the percentage of Witness protection laws and their implementation in India.

Figure-7

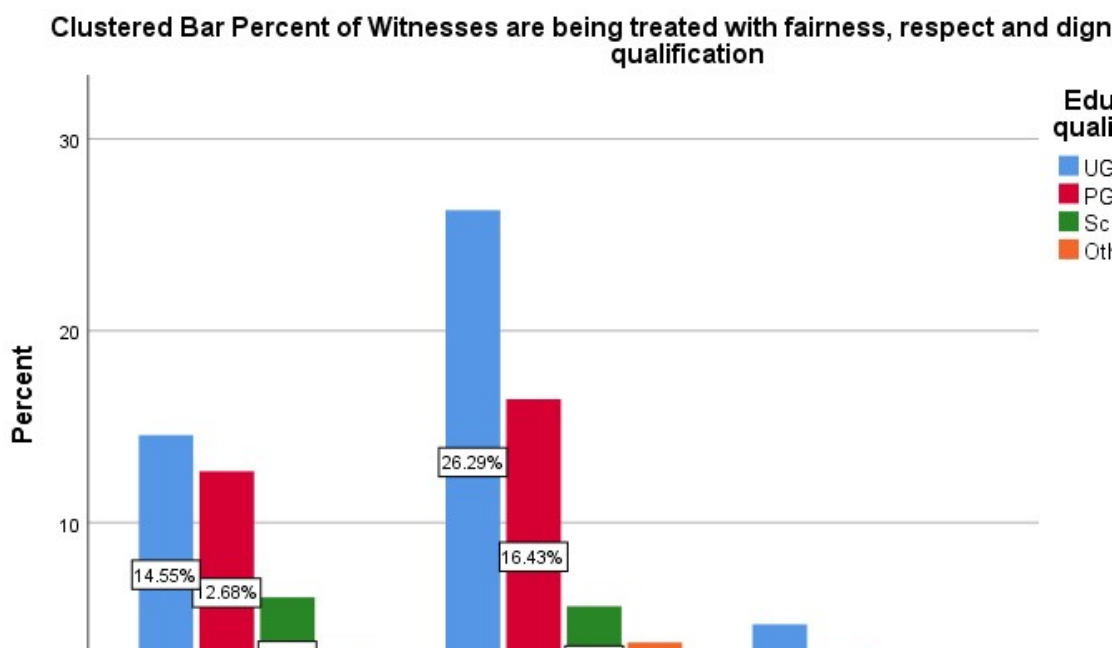
Legend: Figure 7 shows the percentage of Locality and Improper protection to witnesses creates hesitate to come forward to support the court during the trial of the sample population.

Figure-8



Legend: Figure 8 shows the percentage of Locality and witness there are Absence of police protection during and after the trial of the sample population.

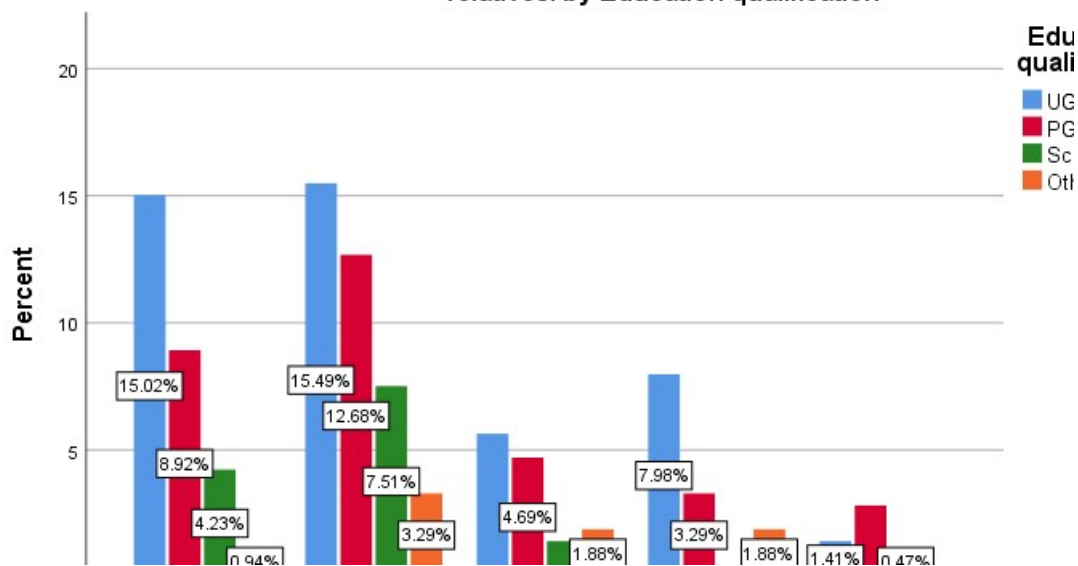
Figure-9



Legend: Figure 9 shows the percentage of Educational Qualification and Witnesses are being treated with fairness, respect and dignity of the sample population.

Figure-10

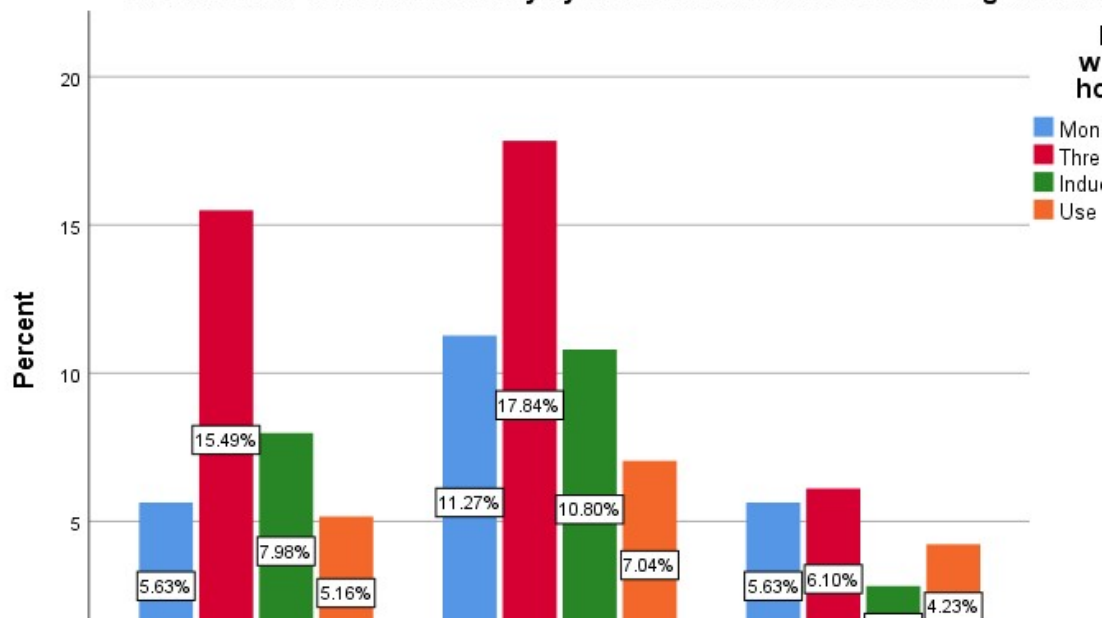
Clustered Bar Percent of Witnesses are threatened, intimidated, harassed and induced by relatives. by Education qualification



Legend: Figure 10 shows the percentage of Educational Qualification and Witnesses are threatened, intimidated, harassed and induced by the accused to his relatives of the sample population.

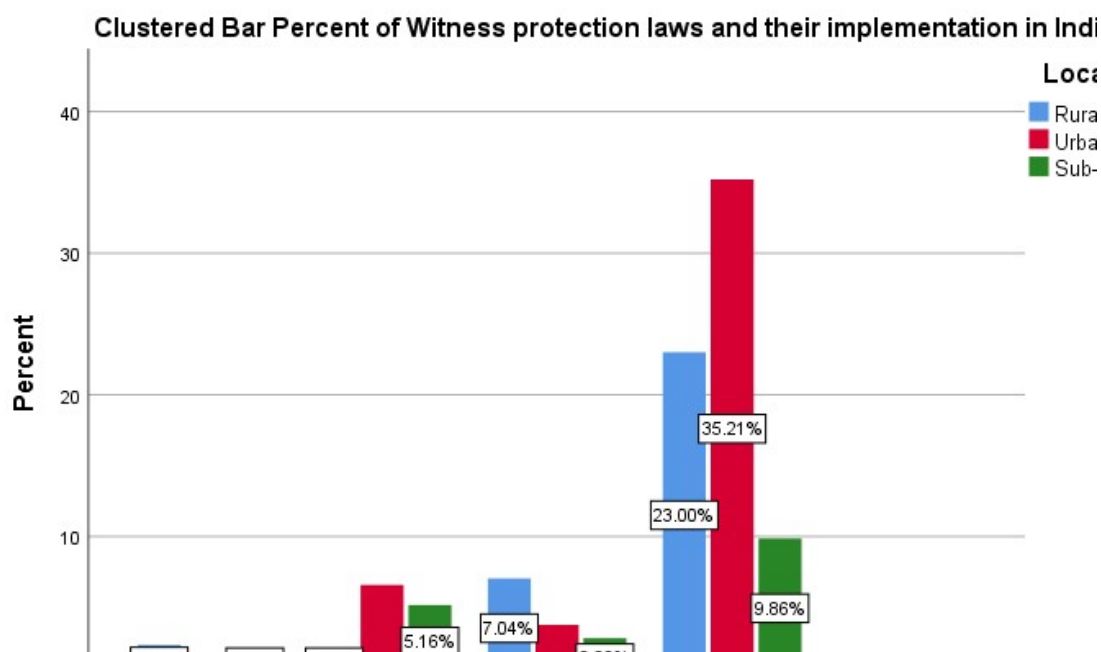
Figure-11

Clustered Bar Percent of Locality by Reason for the witnesses turning hostile



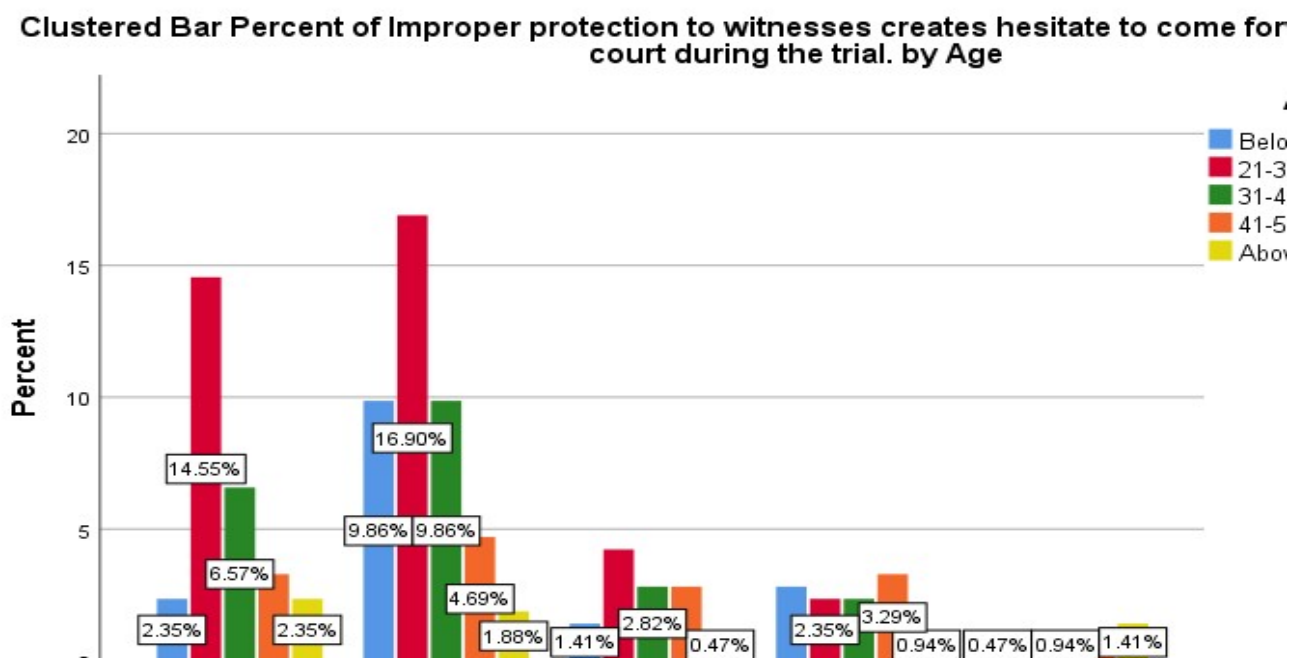
Legend: Figure 11 shows the percentage of Locality and reason for the witnesses turning hostile during trial of the sample population.

Figure-12



Legend: Figure 12 shows the percentage of Locality and Witness protection laws and their implementation in India of the sample population.

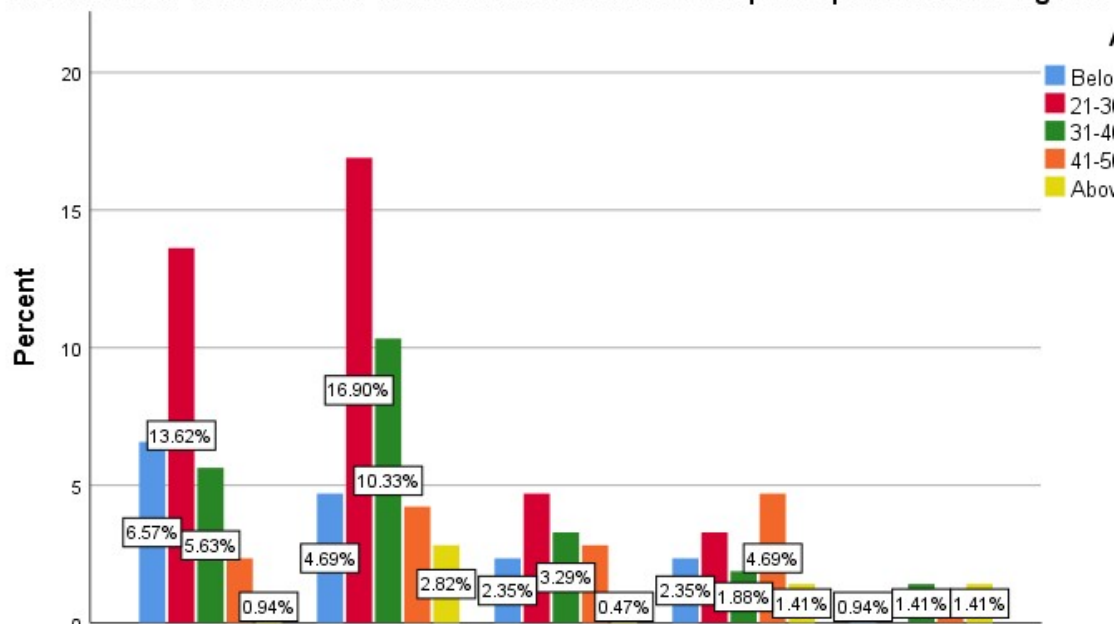
Figure-13



Legend: Figure 13 shows the percentage of Age and Improper protection to witnesses creates hesitate to come forward to support the court during the trial of the sample population.

Figure-14

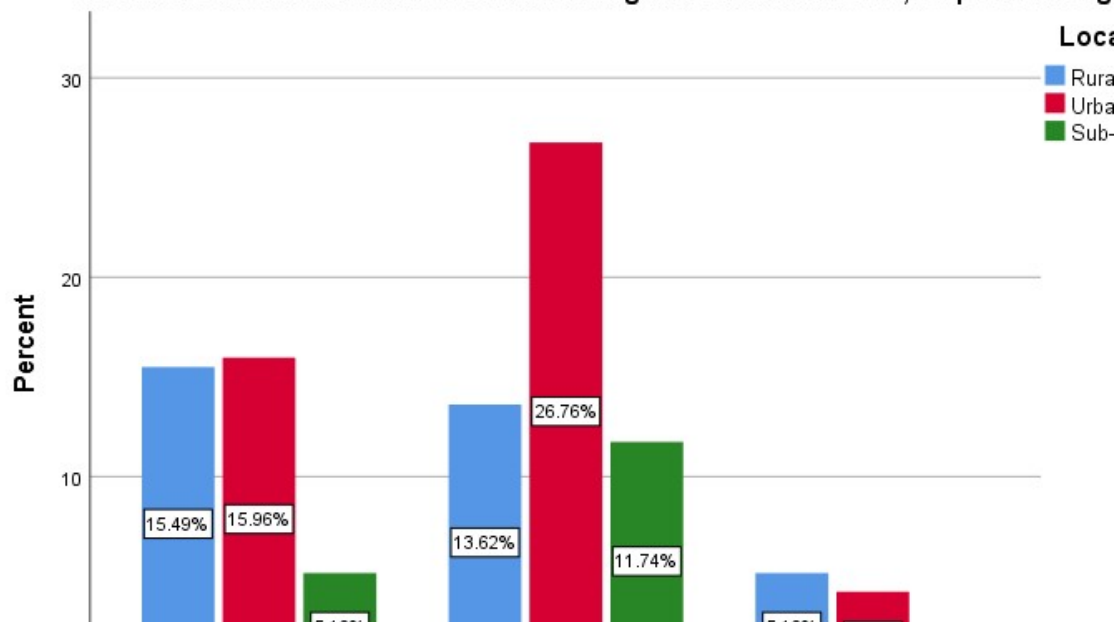
Clustered Bar Percent of For witness there are Absence of police protection during and



Legend: Figure 14 shows the percentage of Age and witness there are Absence of police protection during and after the trial of the sample population.

Figure-15

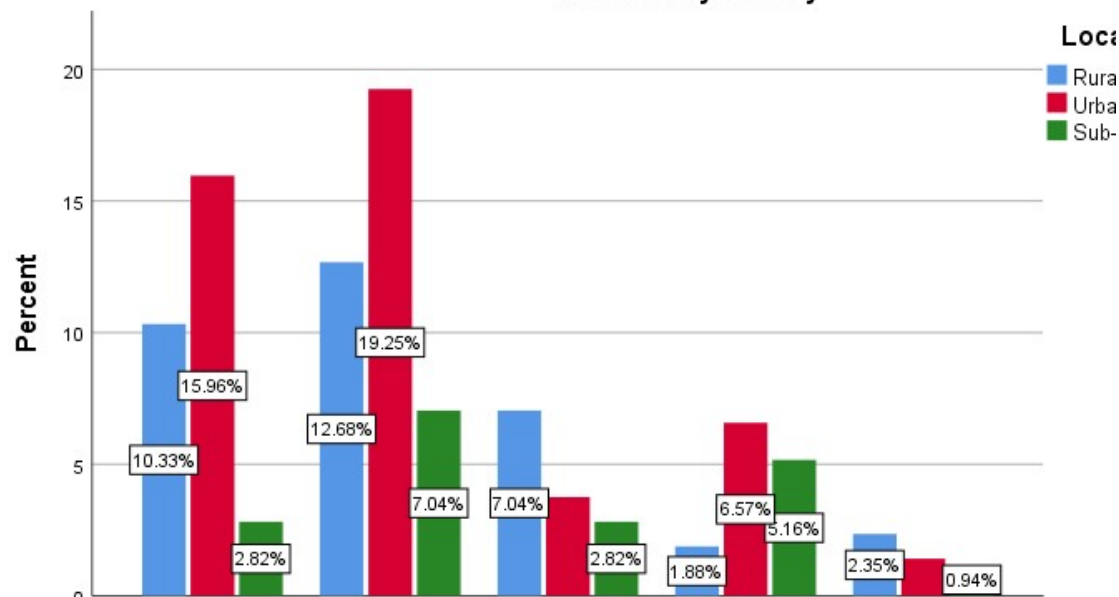
Clustered Bar Percent of Witnesses are being treated with fairness, respect and dig



Legend: Figure 15 shows the percentage of Locality and Witnesses are being treated with fairness, respect and dignity of the sample population.

Figure-16

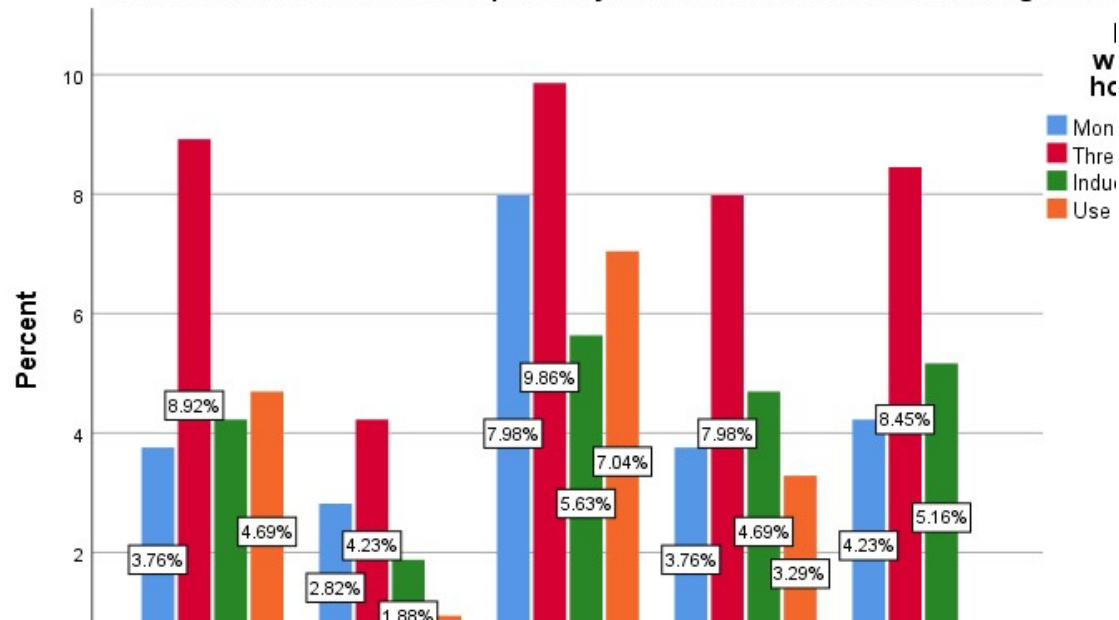
Clustered Bar Percent of Witnesses are threatened, intimidated, harassed and induced by relatives. by Locality



Legend: Figure 16 shows the percentage of Locality and Witnesses who are threatened, intimidated, harassed and induced by the accused to his relatives of the sample population.

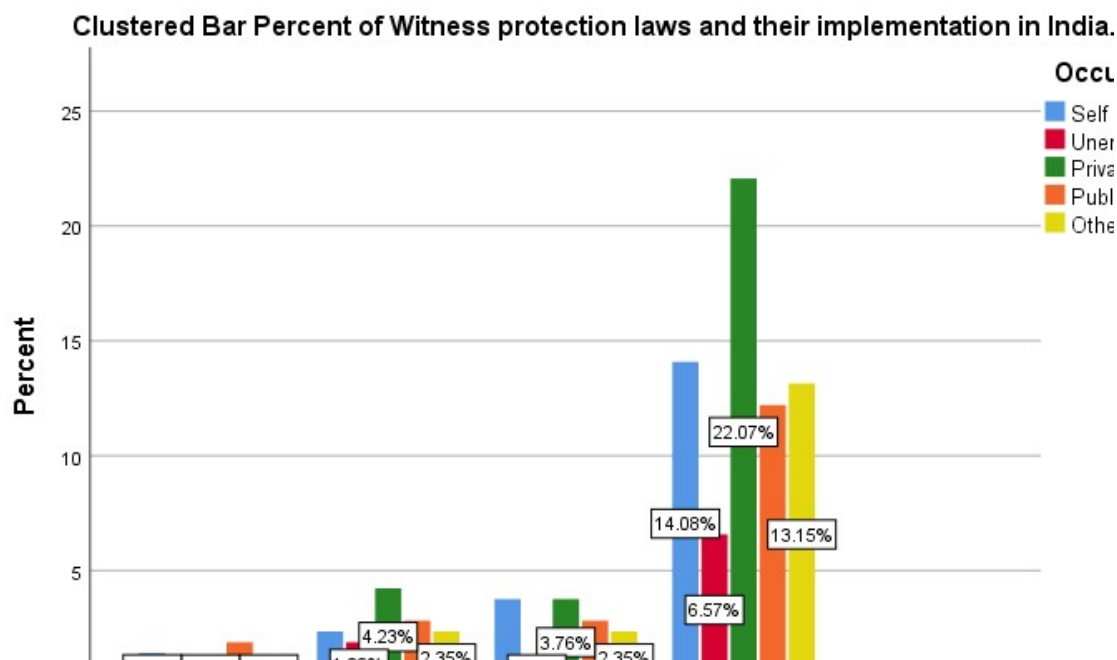
Figure-17

Clustered Bar Percent of Occupation by Reason for the witnesses turning hostile



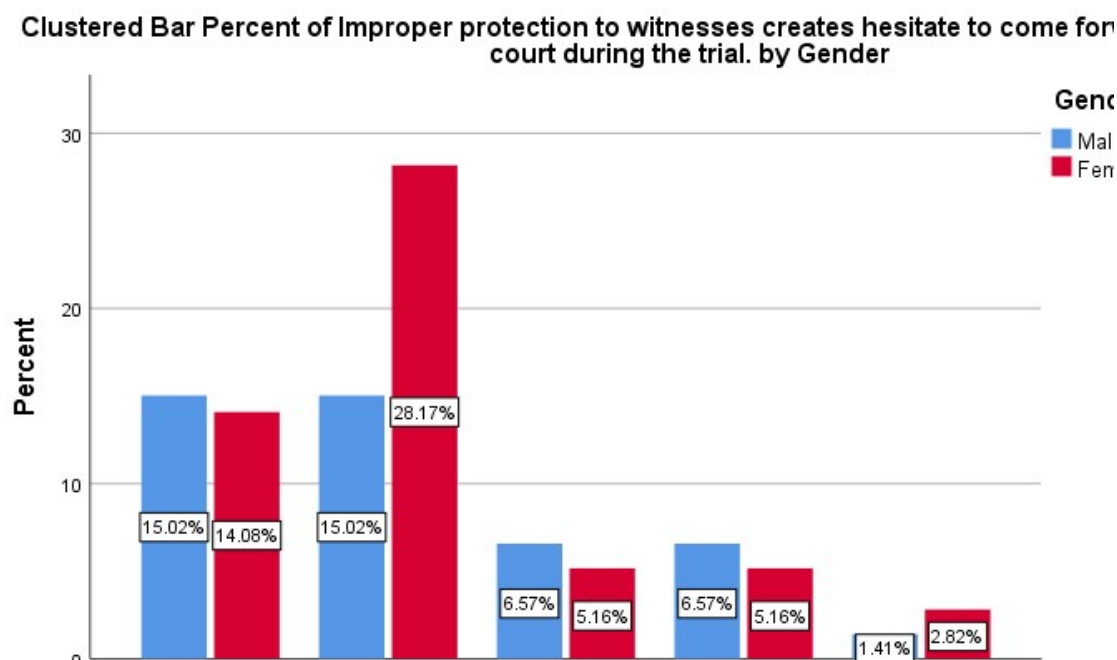
Legend: Figure 17 shows the percentage of occupation and reason for the witnesses turning hostile during trial of the sample population.

Figure-18



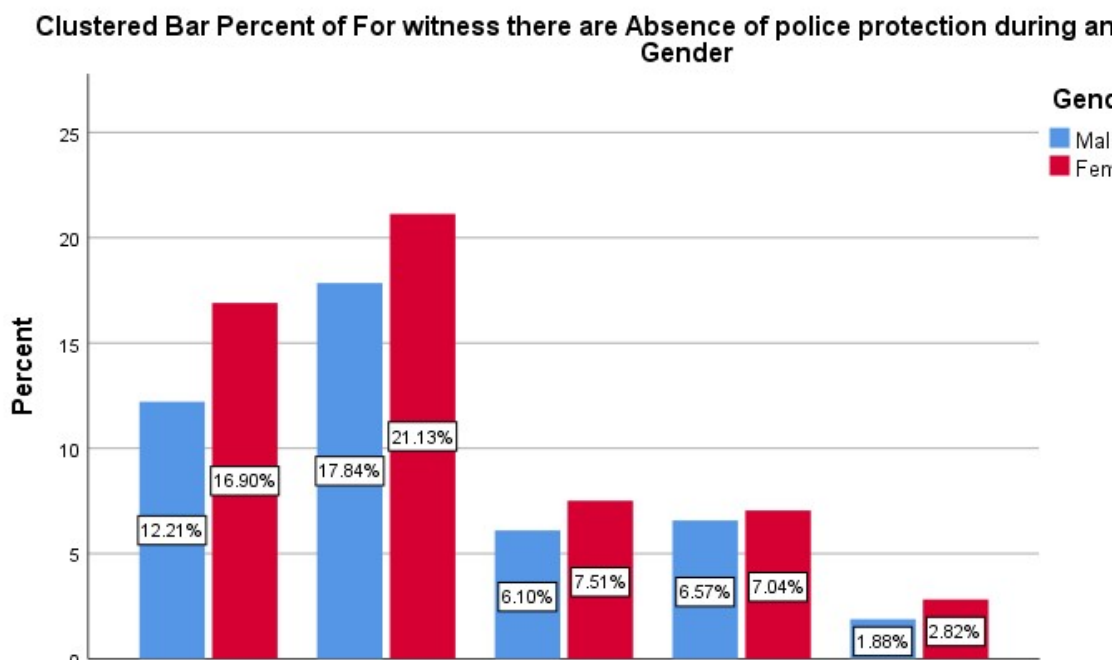
Legend: Figure 18 shows the percentage of occupation and Witness protection laws and their implementation in India of the sample population.

Figure-19



Legend: Figure 19 shows the percentage of Gender and Improper protection to witnesses creates hesitate to come forward to support the court during the trial of the sample population.

Figure-20



Legend: Figure 20 shows the percentage of Gender and witness there are Absence of police protection during and after the trial of the sample population.

Table-1

Chi-Square Tests

	Value	df	A Si
Pearson Chi-Square	2.758 ^a	2	
Likelihood Ratio	2.779	2	
Linear-by-Linear Association	2.289	1	
N of Valid Cases	213		

Legend: Table-1 represents the Chi-Square Test between two variables, which includes Gender and Witnesses are being treated with fairness, respect and dignity of the sample population.

Table-2

		ANOVA		
		Sum of Squares	df	Mean Square
Witnesses are threatened, intimidated, harassed and induced by the accused to his relatives.	Between Groups	26.312	4	6.578
	Within Groups	256.486	208	1.233
	Total	282.798	212	
Improper protection to witnesses creates hesitate to come forward	Between Groups	16.185	4	4.046
	Within Groups	244.303	208	1.175

Legend: Table-2 represents the one way anova between three variables, witnesses are threatened, intimidated, harassed and induced by the accused to his relatives, improper protection to witnesses creates hesitate to come forward to support the court during the trial and age of the sample population.

Results:

From **Figure-1** can understand that most of them have responded that No, witnesses are not being treated with fairness, respect and dignity. From **Figure-2** can understand that most of them have agreed that witnesses are threatened, intimidated, harassed and induced by the accused to his relatives. From **Figure-3** can understand that that most of them have agreed that Improper protection to witnesses creates hesitate to come forward to support the court during the trial. From **Figure-4** can understand that most of them have agreed that for witness there are Absence of police protection during and after the trial. From **Figure-5** can understand that most of them have stated threat or intimidation might be the major reason for the witnesses turning hostile. From **Figure-6** can understand that most of them have stated slightly dissatisfied that witness protection laws and their implementation in India. From **Figure-7** can understand that most of them belonging to urban residence have shown higher preference by agreeing that Improper protection to witnesses creates hesitate to come forward to support the court during the trial. From **Figure-8** can understand that most of them belonging to urban residence have shown higher preference by agreeing that for witness there are Absence of police protection during and after the trial. From **Figure-9** can understand that most of them belonging to the UG category have shown a higher preference by stating No, Witnesses are not being treated with fairness, respect and dignity. From **Figure-10** can understand that most of them belonging to the UG category have shown a higher preference

by agreeing that witnesses are threatened, intimidated, harassed and induced by the accused to his relatives. From **Figure-11** can understand that most of them belonging to urban residence have shown higher preference by stating threat or intimidation might be the major reason for the witnesses turning hostile. From **Figure-12** can understand that most of them belonging to urban residence have shown slightly dissatisfied about the witness protection laws and their implementation in India. From **Figure-13** can understand that most of them belonging to Age group 21-30 years have shown higher preference by agreeing that Improper protection to witnesses creates hesitate to come forward to support the court during the trial. From **Figure-14** can understand that most of them belonging to Age group 21-30 years have shown higher preference by agreeing that for witness there are Absence of police protection during and after the trial. From **Figure-15** can understand that most of them belonging to urban residence have shown higher preference in by stating No, Witnesses are not being treated with fairness, respect and dignity. From **Figure-16** can understand that most of them belonging to urban residence have shown higher preference by agreeing that witnesses are threatened, intimidated, harassed and induced by the accused to his relatives. From **Figure-17** can understand that most of them belonging private sector category have shown higher preference by stating threat or intimidation might be the major reason for the witnesses turning hostile. From **Figure-18** can understand that most of them belonging self employed category have shown higher preference slightly dissatisfied about the witness protection laws and their implementation in India. From **Figure-19** can understand that most of them belonging to Gender female have shown a higher preference by agreeing that Improper protection to witnesses creates hesitate to come forward to support the court during the trial. From **Figure-20** can understand that most of them belonging to Gender female have shown a higher preference by agreeing that for witness there are Absence of police protection during and after the trial. **Table-1** represents the Chi-Square Test between two variables, which includes Gender and Witnesses are being treated with fairness, respect and dignity, the asymp(2-sided) value is more than 0.05 and thus, the alternate hypothesis is Rejected. **Table-2** represents the one way anova between three variables, witnesses are threatened, intimidated, harassed and induced by the accused to his relatives, improper protection to witnesses creates hesitate to come forward to support the court during the trial and age, The sig value is greater than 0.05, The alternative hypothesis is rejected.

Discussion:

From the above mentioned results we can clearly understand the perception of the general public towards witness this could be because in practical circumstance witness are not been treated properly in the court and they are not respected during the trail. Most of the witness and their families would be threatened or harassed in order to avoid witness from giving such statement against the accused person. It creates a hesitation from view of the society as there no proper protection to witness. Proper police protection are not given to the witnesses both during the trail and also after the trail or proceedings. There might be various reasons for a witness turning hostile Money and muscle power, Threat/Intimidation, Inducement by various means and also Use of stock witnesses. The witness is afraid of facing the wrath of convicts who may be well connected. Another reason is the inordinate delay in disposal of cases. It protracts the witnesses ordeal. Intimidation is also one of the causes of witnesses turning hostile. But it is difficult to accept that what they perceive as harassment from the long trial and the way they are treated in court can make them hostile. Inducements in cash and kind appear to play an important role in witnesses turning hostile. Slightly dissatisfied about witness protection laws could be because their implementation are not proper in India comparing to other countries. Gender and Witnesses are being treated with fairness, respect and dignity, the asymp(2-sided) value is more than 0.05 and thus, the alternate hypothesis is rejected and has no significant association. witnesses are threatened, intimidated, harassed and induced by the accused to his relatives, improper protection to witnesses creates hesitate to come forward to support the court during the trial and age, The sig value is greater than 0.05, The alternative hypothesis is rejected and has no significant difference.

Limitations:

The limitations of this study is the use of sampling as a source for data collection. Random sampling is a more efficient way to collect data for the research study, collection of random samples is made by questionnaires that are online surveys and also collected by directly posting questions to the general public. The sample population collected (211) is not sufficient to know about the awareness of the entire population of India as it is sample data collected.

Suggestions:

- Creating a witness protection fund.
- Creating a committee to monitor witness protection.
- Avoid exposing the identity of the witness in the judgments.
- Establishment of witness protection cells.
- Allocating police only for witness protection in station.

Conclusion:

Witnesses are recognised as one of the most important components of the criminal justice system. It is because of them that the trial is able to reach a reasonable result. However, the laws relating to the protection of witnesses is inadequate and also the need for a witness protection programme in India is highly required for safeguarding them. The Criminal Code Procedure do not include any such sections for the protection of witnesses which is another problem looked into this paper. This are some of the major problems faced by the witnesses as sometimes they are threatened by the opposite party and protection for them is highly required for a fair trial. As a result, they should be treated with respect. However, a number of incidents have surfaced that reveal the predicament of witnesses. They are not only mistreated and tormented in the courts, but they are also subjected to intimidation and torture by the accused throughout the trial. Furthermore, the witness's grief and suffering caused by aiding in the court process can only be alleviated by instilling a sense of pleasure in their minds and treating them with respect and protection at all phases of the investigation and trial.

References:

1. Philadelphoff-Puren N. Hostile Witness: Torture Testimony in the War on witness. *Life Writing*. 2008 Oct 1;5(2):219-36.
2. Thakur, Rustam Singh. "Evidentiary Value of Hostile Witness: Chronological Case Law Study to Address Current Position in India." *ALL INDIA REPORTER-(AIR)* (2012).
3. Arvind, Bhosale Rakesh. "HOSTILE WITNESS/QUESTIONS BY PARTY TO HIS OWN WITNESS." *Sustainable Development for Society, Industrial* (2022): 45.
4. Gupta, Devang, and Nitika Rawat. "Hostile Witness: Its Impact on Trials and Justice Delivery System." *Supremo Amicus* 24 (2021): 646.

5. Dhiman, Mehak, and Ayesha Adyasha. "Role of Judiciary in protecting hostile witness: a critical analysis." (2021).
6. Berti, Daniela. "Hostile Witnesses, Judicial Interactions and Out-of-Court Narratives in a District Court of North India." *HAL archives-ouvertes* (2009).
7. Ghosh, Pritam. "Hostile Witnesses in India-A Menace to Criminal Justice Administration." *Available at SSRN 2283861* (2013).
8. Parakh, S. C. "Expert witness." *Indian Journal of Anaesthesia* 55.4 (2011): 421.
9. Sanchez, Maria H., and Shirley Wei Zhang. "The role of the expert witness in accounting fraud cases." *Global journal of business research* 6.1 (2012): 103-111.
10. Williams, C. R. "Evidence and the expert witness." *Australian Journal of Forensic Sciences* 26.1 (1994): 3-7.
11. Richard A. Leo & Alexa Koenig, *The Gatehouse and Mansions: Fifty Years Later*, 6 ANN. REV. L. & SOC. SCI. Pp: 323-339, 2010, DOI-<https://doi.org/10.1146/annurev-lawsocsci-102209-152938>
12. Saul M Kassin, Steven A Drizin, et.al, 2010, Police-induced confessions: risk factors and recommendations, *Law Hum Behav* . 2010 Feb;34(1):3-38. DOI: 10.1007/s10979-009-9188-6
13. Steven M Smith, Veronica Stinson, et.al, High-risk interrogation: using the "Mr. BigTechnique" to elicit confessions, 34(1):39-40. doi: 10.1007/s10979-009-9203-y
14. Richard A Leo 1, Brittany Liu, Volume 27, issue 3, Pp :381-99, What do potential jurors know about police interrogation techniques and false confessions. DOI:10.1002/bsl.872
15. Abdul Rashid v PP [1994] 1 SLR 119, Case Note: The Court of Appeal's Lack of Jurisdiction to Reopen Appeals: Abdullah Bin A Rahman v Public Prosecutor [1994] DOI:https://www.researchgate.net/publication/228190085_Case_Note_The_Court_o_Appeal's_L
16. Bruton v United States 391 US 123 (1968), DOI <https://supreme.justia.com/cases/federal/us/391/123/>
17. R v Andrews [1987] 1 All ER 513, DOI-<https://simplestudying.com/r-v-andrews-donald-joseph-1987-ac-281/>
18. Kashmira Singh v State of Madhya Pradesh [1952] AIR SC 159, <https://indiankanoon.org/doc/1924452/#:~:text=The%20Judgment%20of%20the%20Court,were%20tried%20along%20with%20him.>

19. Bourjaily v US 483 US 171 (1987),
<https://supreme.justia.com/cases/federal/us/483/171/>
20. 10. Gudjonsson, The Psychology of Interrogations, Confessions and Testimony (1992), Pp:262-289, DOI-<http://www.al-edu.com/wp-content/uploads/2014/05/Gudjonsson-The-Psychology-of-Interrogations-and-Confessions.pdf>