



FIR AS THE FOUNDATION OF CRIMINAL INVESTIGATION UNDER BNSS, 2023

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Abstract

The First Information Report (FIR) constitutes the foundational step in the criminal justice process, serving as the trigger for investigation into cognizable offences. With the enactment of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS), India has undertaken a significant reform of its procedural criminal law, replacing colonial-era provisions of the Code of Criminal Procedure, 1973. Although the BNSS does not explicitly define the term “FIR,” its procedural framework particularly under Section 173 mandates the recording of information relating to cognizable offences and forwarding it to the Magistrate, thereby reinforcing the centrality of FIR registration.

This study critically examines the statutory provisions governing FIR under the BNSS, 2023 and analyzes its procedural importance in initiating criminal investigation. It further explores the judicial interpretation of FIR through landmark decisions such as *Manoj Kumar Sharma v. State of Chhattisgarh* and *State of Punjab v. Gurmit Singh*, which underlines that FIR registration, is mandatory upon receipt of information disclosing a cognizable offence. The project also discusses the evidentiary value of FIR, its role in safeguarding the rights of the accused and the victim, and concerns regarding misuse or false reporting.

By analysing statutory provisions and judicial pronouncements, this paper concludes that the FIR

remains the cornerstone of criminal administration under the reformed procedural regime, ensuring transparency, accountability, and timely initiation of justice.

Keywords – *FIR, BNSS, section 173, section 193, cognizable offence, criminal justice system, mandatory registration of FIR, investigation.*

Introduction

An FIR is a written document drafted by the police upon receiving information about the occurrence of a cognizable offence. A cognizable offence is one for which the police can make an arrest without a warrant and initiate an investigation independently, without requiring court orders. In such cases, police officers are obligated to register the FIR and can even commence investigations without it. These offences are typically serious and non-bailable. The FIR represents the initial information received by the police regarding the crime, usually lodged by the victim or someone acting on their behalf.

Brief overview of Bharatiya Nagarik Suraksha Sahita, 2023

The Bharatiya Nagarik Suraksha Sanhita, 2023, was enacted on December 25, 2023, with the stated objective of repealing pre-independence, 19th century colonial-era criminal laws. The Sahita contains 533 sections, 38 chapters and 2 schedules. It will be in force on July 1, 2024, and extend to the whole of India. The BNSS aims to streamline the justice system by tackling issues like complex procedures, a backlog of cases, low conviction rates, limited use of technology in legal processes, slow investigations, and underutilization of forensic tools.¹

Meaning of FIR

The term “First Information Report” (FIR) holds significant importance in the context of criminal justice systems, yet it surprisingly lacks a formal definition within the Bhartiya Nagarik Suraksha

kumar-comprehensive-analysis-bharatiya-nagarik-suraksha-sanhita-2023-252551 (last visited 16 Feb. 2026).

¹ Justice V. Ramkumar, *Comprehensive Analysis of the Bharatiya Nagarik Suraksha Sanhita, 2023*, LiveLaw (India), 16 Feb. 2026, available at: <https://www.livelaw.in/top-stories/justice-ram->



Sahita (BNSS) 2023. Despite this omission, Section 230 of the BNSS mandates that magistrates must provide the accused with a copy of the FIR filed under Section 173 (1) of the Sahita.

An FIR serves as the initial report made to the police regarding the commission of a cognizable offence. It typically contains crucial information such as the details of the incident, including the time, location, and nature of the offence; descriptions of the accused and any witnesses; and any relevant evidence gathered at the scene.²

However, despite the absence of a formal definition, the BNSS 2023 provides several provisions that indirectly shed light on the significance and role of an FIR. For instance, Section 173 of the Sahita mandates police officers to record information related to cognizable offences reported to them, which essentially forms the basis of an FIR.

Moreover, Section 173 (1) of the BNSS 2023 stipulates that a police officer investigating a cognizable offence must prepare an FIR and forward it to the nearest magistrate within 24 hours of receiving the information. This provision underscores the importance of an FIR as a formal record of the initial investigation conducted by the police.³

It can be described as:

- Information given to a police officer.
- Information about a cognizable offence.
- The first report was made about the incident.
- Provided by the victim of the crime or someone acting on their behalf to the police.
- This is the information that starts the investigation.

Purpose and significance of FIRs in the criminal justice system

The first information report is about the ignition of the criminal justice system. The purpose of registering an FIR is to set the machinery of criminal investigation into motion, which culminates with the filing of the police report. Only after registration of the FIR, the beginning of the investigation in a case, the collection of evidence during investigation and the formation of the final opinion are the steps that result in the filing of a report under Section-193, BNSS.⁴

In the landmark case of *Manoj Kumar Sharma and others vs. The State of Chhattisgarh and Anr.* (2016), the Hon'ble Supreme Court of India expounded on the pivotal significance and purpose of a First Information Report (FIR) in the criminal justice system.

An FIR serves as the initial step towards the administration of criminal justice. It can be likened to the foundation stone upon which the entire structure of the criminal justice system is built. In essence, an FIR sets the stage for the investigation and prosecution of criminal offences.⁵

The primary purpose of an FIR is to provide the police with the necessary information to initiate an investigation into a cognizable offence. It serves as a crucial tool for law enforcement agencies to gather essential details such as the nature of the crime, the time and place of its occurrence, the identity of the victim(s) and suspect(s), and any other relevant information.

The importance of an FIR cannot be overstated, as it sets in motion the criminal justice machinery. It triggers the immediate commencement of an investigation by the police, facilitating the collection

² K.N. Chandrasekharan Pillai, *R.V. Kelkar's Criminal Procedure* (Eastern Book Company, 7th edn., 2016).

³ The Bharatiya Nagarik Suraksha Sanhita, 2023, No. 46 of 2023, § 173 (India).

⁴ India's criminal laws set to get a revamp, Lok Sabha approves BNSS Bill, *The Economic Times*

(India), 20 Dec. 2023, available at:

<https://economictimes.indiatimes.com/news/india/indias-criminal-laws-set-to-get-a-revamp-lok-sabha-approves-bnss-bill/articleshow/106155859.cms> (last visited 16 Feb. 2026).

⁵ C.K. Takwani, *Criminal Procedure* (Eastern Book Company, latest edn.).



of evidence, identification of witnesses, and apprehension of the accused.

Moreover, an FIR serves as a vital record of the initial complaint or information received by the police. It helps to ensure transparency, accountability, and adherence to due process in the investigation of criminal cases. An FIR provides a clear trail of events, allowing for effective monitoring and supervision of the investigative process.

Furthermore, an FIR plays a crucial role in safeguarding the rights of both the victim and the accused. It serves as a valuable piece of evidence in court proceedings, helping to establish the facts of the case and determine the guilt or innocence of the accused.

Provisions of FIR registration under *Bhartiya Nagarik Suraksha Sahita, 2023*

FIR is registered under Section 173 of the BNSS, 2023. Anyone who has information about the commission of a cognizable offence can lodge an FIR. It is not necessary that he/she be the victim or eye-witness himself. A police officer can lodge an FIR on his own if he comes to know about the commission of a cognizable offence.⁶ In *Hallu & Ors. vs. the State of M.P.*⁷ the Supreme Court of India interpreted Section 154 of the Code of Criminal Procedure, 1973 (CrPC), which has since been renumbered as Section 173 of the Bihar, Jharkhand, and Odisha Police Act, 2016 (BNSS). The Court held that Section 154 CrPC (now Section 173 BNSS) does not require that the report of a cognizable offence be given by a person who has personal knowledge of the incident reported.⁸

The Court reasoned that the language of Section 154 CrPC (now Section 173 BNSS) speaks of “information relating to the commission of a cognizable offence given to an officer in charge of a police station.” This broad language does not limit the

source of the information to persons who have personal knowledge of the incident. The Court noted that the purpose of Section 154 CrPC (now Section 173 BNSS) is to ensure that all information about cognizable offenses is promptly reported to the police so that they can investigate and take appropriate action. This purpose would be frustrated if the section were interpreted to require that the information be given only by persons who have personal knowledge of the incident.

The Court’s interpretation of Section 154 CrPC (now Section 173 BNSS) has been followed by courts in subsequent cases. In *State of Punjab vs. Gurmit Singh*,⁹ the Supreme Court held that a police officer can register an FIR based on information received from a reliable source, even if the officer does not have personal knowledge of the incident. The Court noted that the purpose of an FIR is to set the criminal justice system in motion, and that this purpose would be defeated if the police were required to conduct a preliminary investigation before registering an FIR.

The Court’s interpretation of Section 154 CrPC (now Section 173 BNSS) has also been criticised by some commentators. They argue that the Court’s interpretation gives the police too much discretion in deciding when to register an FIR. They also argue that the Court’s interpretation could lead to false and frivolous FIRs being registered.

Despite these criticisms, the Court’s interpretation of Section 154 CrPC (now Section 173 BNSS) remains the law of the land. It is a well-established principle that the police can register an FIR based on information received from a reliable source, even if the officer does not have personal knowledge of the incident.

⁶ The *Bhartiya Nagarik Suraksha Sanhita*, 2023, No. 46 of 2023, § 173 (India).

⁷ AIR 1974 SC.

⁸ K.N. Chandrasekharan Pillai, *R.V. Kelkar’s*

Criminal Procedure (Eastern Book Company, 7th edn., 2016).

⁹ (2009), 2 SCC 575.



Section 173: information in cognizable cases

Any report regarding the occurrence of a cognizable offence can be communicated orally or through electronic means to the police station's officer in charge, regardless of the location where the offence took place. If such information is provided.

If reported orally, it must be written down and signed by the informant after being read back to them.

If reported electronically, it must be signed within three days by the person giving it and recorded in a prescribed format. The details of the information should be entered into a designated book in a format specified by the State Government. Additionally, if the information is provided by a woman who is allegedly a victim under Section 64, Section 65, Section 66, Section 67, Section 68, Section 69, Section 70, Section 71, Section 74, Section 75, Section 76, Section 77, Section 78, Section 79 or Section 124 of the Bharatiya Nyaya Sanhita, 2023, it must be recorded by a female police officer or any female officer authorised for this purpose.

Provided further that-

- In the event that the person against whom an offence under Section 64, Section 65, Section 66, Section 67, Section 68, Section 69, Section 70, Section 71, Section 74, Section 75, Section 76, Section 77, Section 78, Section 79 or Section 124 of the Bharatiya Nyaya Sanhita, 2023 is alleged to have been committed or attempted, and such person is temporarily or permanently mentally or physically disabled, the information about the alleged offence will be recorded either at the residence of the person reporting the offence or at a location chosen for their convenience. An interpreter or a special educator, if needed, will be present during this process.
- Such information must be recorded in video format.

- The police officer must ensure that the person's statement is promptly recorded by a magistrate as per the provisions of clause (a) of sub-section (6) of Section 183.¹⁰

A free copy of the recorded information from subsection (1) must be provided to the informant or the victim.

Apart from what is stated in Section 175, when the police station receives information about a punishable offence with a sentence of three to seven years, the officer in charge can, with permission from a Deputy Superintendent of Police, either conduct a preliminary inquiry within fourteen days to determine if there is a basis to proceed or proceed directly with the investigation if there's sufficient evidence to suggest wrongdoing.

If any person is denied by the officer in charge of a police station to write his FIR, then they can send a written complaint by mail to the relevant Superintendent of Police. If the Superintendent is convinced that the information indicates a cognizable offence, they will either personally investigate the case or instruct a subordinate police officer to do so according to the law. This officer will have the authority of the police station's officer in handling the offence.

Alternatively, the aggrieved person can approach the magistrate if these steps are not taken.

E-FIR

The BNSS also introduces provisions for electronic FIR (E-FIR), allowing FIR registration through electronic means.

This provision serves as a significant relief for victims, especially women, by expediting the registration process and preventing them from reliving traumatic experiences while reporting crimes.

¹⁰ The Bharatiya Nagarik Suraksha Sanhita, 2023, No. 46 of 2023, § 185 (India).

¹¹ The Bharatiya Nagarik Suraksha Sanhita, 2023, No. 46 of 2023, § 175 (India).



While this development is a positive step towards timely and sensitive case registration, it raises concerns about unregulated online FIR registrations. The Parliamentary Standing Committee recommended that such registrations be allowed through specified modes regulated by the state to avoid logistical challenges and the proliferation of unmanageable FIRs.

The BNSS now includes a provision for lodging information electronically (e-FIR) under Section 173(1), requiring the informant's signature to be obtained within three days prior to the official recording of the e-FIR.¹²

Preliminary enquiry

Section 173(3) of the BNSS now introduces the concept of a 'preliminary enquiry' before registering an FIR, aimed at determining the existence of a prima facie case involving cognizable offences punishable with imprisonment between 3 to 7 years. This enquiry must be completed within 14 days. It specifies that upon receiving information about such offences, the senior police officer in charge can either conduct a preliminary enquiry to establish a prima facie case or proceed directly with the investigation. Permission from a Deputy Superintendent of Police or higher rank is required to conduct this preliminary enquiry.

Concept of zero FIR

Zero FIR (First Information Report) is a concept introduced to ensure that a cognizable offence can be reported and registered at any police station, regardless of the jurisdiction where the incident occurred.

The idea behind Zero FIR is to facilitate the prompt registration of a complaint without any delay, especially in cases where immediate intervention is required.

Certainly, the inclusion of the Zero FIR provision is beneficial for victims since police officers are obligated to record the initial information, irrespective of territorial jurisdiction. The words in Section 173(1) "irrespective of the area where the offence is committed" remove the jurisdictional barriers.

It is important to observe that the concept of a zero FIR is not a recent introduction in the Indian criminal law system. In a 2015 advisory from the Ministry of Home Affairs, the government recommended the filing of zero FIRs specifically for crimes against women. Furthermore, the judiciary has consistently emphasised the necessity of registering zero FIRs in various cases.

For instance, in the case of *State of AP vs. Punati Ramulu and Ors.*, the Supreme Court held that the constable should have recorded information about the cognizable offence and forwarded it to the police station responsible for the area where the crime was allegedly committed, despite any territorial jurisdictional limitations.¹³

BNSS 2023 has now given a statutory mandate for zero FIR under Section 173 (1).

When a person wants to report a crime, they can go to any police station to file an FIR, even if the incident did not occur within that police station's jurisdiction. The police station where the report is filed then registers the case with a temporary number, known as a Zero FIR, and initiates the investigation. Subsequently, the case is transferred to the police station, which has jurisdiction over the area where the offence took place. It helps ensure that the legal process starts promptly and that the investigation is not hindered by jurisdictional issues.

Mandatory registration

If police officer refuse to record the FIR of the complainant, then he may send the substance of such information, in writing and by post, to the

¹² Ministry of Parliamentary Affairs (India), *Official Website*, Government of India, available at:

<https://mpa.gov.in/> (last visited 17 Feb. 2026).

¹³ 1993 Supp (3) SCC 302.



Superintendent of Police, if satisfied that such information discloses the commission of a cognizable offence, the superintendent of police can either investigate the case himself or direct an investigation to be made by any police officer subordinate to him.

Section 173(4) of the BNSS explicitly allows for the option to file an application with the magistrate under Section 175(3) of the BNSS if the FIR is not registered despite the Superintendent of Police's intervention.

In the landmark case of *Lalita Kumari vs. Government of Uttar Pradesh (2014)*, the Supreme Court of India issued a significant ruling mandating the compulsory registration of First Information Reports (FIRs) in cases involving cognizable offences. This landmark judgement aimed to streamline the process of handling criminal complaints and ensure prompt action by law enforcement agencies.¹⁴

Prior to this ruling, the registration of FIRs was often subject to the discretion of police officers, leading to inconsistent practices and potential delays in the initiation of investigations. The Supreme Court recognised the crucial role of FIRs in initiating criminal proceedings and safeguarding the rights of victims and aggrieved parties.

The Court's directive emphasised the importance of prompt and impartial action by the police in registering FIRs. It directed police officers to register FIRs without hesitation or prejudice, regardless of the social or economic status of the complainant or the accused. This mandate aimed to eliminate discriminatory practices and ensure equal access to justice for all.

The Supreme Court further clarified the procedures for registering FIRs. It emphasised that FIRs should be registered based on the information provided by the complainant without requiring corroboration from

independent sources. This provision streamlined the registration process and eliminated unnecessary delays.

To ensure accountability and transparency, the Court directed police officers to provide written acknowledgment of FIRs to the complainant. This measure aimed to prevent instances where FIRs were not registered or were wilfully delayed. Additionally, the Court mandated that police officers maintain a register of all FIRs and issue regular reports to their superiors.

The judgement in *Lalita Kumari vs. Government of Uttar Pradesh* marked a significant milestone in reforming the criminal justice system in India. By mandating the compulsory registration of FIRs, the Supreme Court sought to enhance the efficiency and fairness of the investigative process, ensuring that all cognizable offences were promptly addressed and investigated by law enforcement agencies.¹⁵

Copy to victim

Section 154(2) of the CrPC mandates that a copy of the information be provided free of cost solely to the informant¹⁶, whereas Section 173(2) of the BNSS expands this provision to include both the victim and the informant.¹⁷

Digital documentation and public access to FIR information

FIR can be given online on the website of the relevant agency; e.g., Delhi Police has its own website <https://www.delhipolice.nic.in/> for online FIR registration. FIRs which are given physically can be accessed on the website of the agency Hon'ble Supreme Court, in the case *Youth Bar Association of India vs. Union of India*¹⁸, directed that the First Information Report (FIR) in any case should be on the relevant investigating agency's website within 24 hours of its registration.

¹⁴ (2014) 2 SCC 1.

¹⁵ (2014) 2 SCC 1.

¹⁶ The Code of Criminal Procedure, 1973, No. 2 of 1974, § 154 (India).

¹⁷ The Bharatiya Nagarik Suraksha Sanhita, 2023, No. 46 of 2023, § 173 (India).

¹⁸ (2016) 9 SCC 473.



Requirements/ advantages for maintaining transparent records of FIRs

- **Increased transparency and accountability:** Transparent records ensure that actions taken by law enforcement agencies are visible to the public, fostering trust and accountability within the community.
- **Promoting fairness and due process:** By documenting the initial complaint or allegation, FIR records provide a starting point for legal proceedings, ensuring that individuals are treated fairly and in accordance with due process.
- **Thorough and impartial investigation:** clear and accessible FIR records facilitate thorough investigations by providing a detailed account of the reported incident, enabling law enforcement agencies to gather evidence and pursue leads effectively.
- **Increased public confidence in the justice system:** Transparent FIR records demonstrate a commitment to openness and integrity within the justice system, thereby enhancing public confidence and belief in the fairness of legal processes.
- **Deterring criminal behaviour:** Publicly available FIR records act as a deterrent to criminal behaviour by signalling that unlawful actions will be documented and investigated, potentially reducing the occurrence of crimes within the community.

Challenges and criticisms regarding FIR

The First Information Report (FIR) plays a crucial role in the criminal justice system as it serves as the initial document that sets the foundation for an investigation. However, despite its significance, there are several challenges and criticisms associated with FIRs that need to be addressed:

1. **Delay in registration:** One of the primary challenges is the delay in registering an FIR. In many cases, victims or witnesses face bureaucratic hurdles, lack of cooperation from law enforcement officials, or pressure from

influential individuals that can result in delayed FIR registration. This delay can hamper the investigation process and allow perpetrators to evade justice.

2. **Lack of sensitivity:** Critics argue that FIRs often lack sensitivity towards vulnerable groups, such as women, children, and members of marginalised communities. Insensitive handling of FIRs can discourage victims from coming forward and reporting crimes, further perpetuating a cycle of impunity.
3. **False and frivolous FIRs:** Another challenge is the issue of false and frivolous FIRs. Sometimes, individuals may file false complaints to settle personal scores, harass others, or even as a form of extortion. Such false FIRs can strain police resources and divert attention away from genuine cases.
4. **Misuse of FIRs for harassment:** Critics also raise concerns about the potential misuse of FIRs by authorities to harass and intimidate individuals, particularly those critical of the government or powerful entities. The threat of an FIR can have a chilling effect on dissent and freedom of expression.
5. **Need for reform:** Given these challenges, experts and activists have called for reforms to the FIR system. These reforms could include measures such as:
 - Mandating timely registration of FIRs within a specified period.
 - Establishing specialised units within police departments to deal sensitively with cases involving vulnerable groups.
 - Implementing mechanisms to verify the authenticity of complaints and prevent false FIRs.
 - Strengthening oversight and accountability mechanisms to prevent the misuse of FIRs for harassment.



- Incorporating restorative justice principles to promote healing and resolution in certain cases.¹⁹

Addressing these challenges and criticisms is essential to ensuring a fair and effective criminal justice system. By implementing comprehensive reforms, authorities can strengthen the FIR system, uphold the rights of victims, and promote public trust in the rule of law.

Landmark supreme court rulings on FIR

1. *Lalita Kumari v. Government of Uttar Pradesh*²⁰

The Supreme Court held that registration of FIR is **mandatory** under Section 154 CrPC (now Section 173 BNSS) if information discloses commission of a cognizable offence. Police cannot conduct a preliminary inquiry before registration, except in limited categories (e.g., matrimonial disputes, commercial offences, medical negligence, etc.). The importance of this case is the backbone of FIR jurisprudence and ensures accountability of police officers.

2. *State of Haryana v. Bhajan Lal*²¹

The Supreme Court laid down **seven categories** where the High Court may quash an FIR under its inherent powers. Importance of this case is that it protects individuals from misuse of criminal law and frivolous FIRs.

3. *Youth Bar Association of India v. Union of India*²²

The Court directed that FIRs must be uploaded on official police websites within 24 hours (with exceptions for sensitive offences).

4. *State of Andhra Pradesh v. Punati Ramulu*²³

The Court held that unexplained delay in lodging FIR may create doubt about prosecution case.

5. *T.T. Antony v. State of Kerala*²⁴

The Court held that there cannot be a second FIR for the same offence/incident.

6. *Manoj Kumar Sharma v. State of Chhattisgarh*²⁵

The Court described FIR as the starting point of criminal law machinery.

7. *Hallu v. State of M.P.*²⁶

The Court held that FIR need not be lodged by an eyewitness; any person with knowledge of cognizable offence can give information.

Conclusion

The FIR is a critical document in every criminal case, marking the start of legal proceedings. As noted in the *Mohan Lal vs. State of Uttar Pradesh (1988)* case, it is considered the cornerstone of the public record for a case. Therefore, it is important for citizens to know their rights regarding FIRs. Understanding these rights helps individuals know how to report a crime or address public offences effectively.

These significant changes introduced by the BNSS mark a fundamental shift in criminal law procedures. While initiatives like Zero FIR and E-FIR aim to enhance victim-centric approaches and accelerate justice delivery, the divergence from established judicial principles in preliminary inquiries warrants critical scrutiny.

The implementation of new FIR provisions and their alignment with existing judicial precedents and

¹⁹ *Need to Know About Registration of FIR, iPleaders Blog (India)* <https://blog.ipleaders.in/need-know-registration-fir> (last visited 17 Feb. 2026).

²⁰ (2014) 2 SCC 1.

²¹ 1992 Supp (1) SCC 335.

²² (2016) 9 SCC 473.

²³ 1993 Supp (3) SCC 302.

²⁴ (2001) 6 SCC 181.

²⁵ (2016) 9 SCC 1.

²⁶ AIR 1974 SC 1936.



principles of justice remain pivotal for the effective and fair administration of criminal law in India.

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