



Comparative Study of Section (302) of PPC With Sections (6,7) Of Anti-Terrorism Act 1997 With Relevant Shahzaib Murder Case

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ABSTRACT

The punishment for murder and terrorism offences are addressed in Section 302 of the Pakistan Penal Code (PPC) and Sections 6 and 7 of the Anti-Terrorism Act (ATA) of 1997, respectively. The defendant in the Shahzeb Khan murder case was initially found guilty and given a death sentence under Section 302 of the PPC. The Anti-Terrorism Court later took over the case, and the defendant was once more found guilty and given a death sentence in accordance with Sections 6 and 7 of the ATA. For the crime of murder, Section 302 of the PPC stipulates that the penalty is either the death penalty or life in prison. Murder is described in the section as the deliberate killing of another person without a cause or valid defense. The prosecution must establish beyond a reasonable doubt that the defendant knowingly committed murder without recourse to legal justification or excuse. This research article has tried to analyze both of these statutes in context of Shahzab Murder Case.



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1. Introduction

When the world was created, ALLAH made it mandatory to follow some general principles of life that were later on encapsulated clearly in the Sunnah and the teachings of the Qur'an. Allah grants everyone the right to life, and all other religions also uphold this principle of a right to life. Article 9 of the constitution of Pakistan and some special laws provide a guarantee of the security of life of the people of Pakistan. Against this background, the author tried to study section 302 of PPC with sections 6, and 7 of the anti-terrorism act 1997 that specifically invoked once the violation of article 9 and other laws providing security to life occurs (NACTA). A prominent criminal case that occurred in Karachi, Pakistan, was the murder of Shahzaib Khan. Because of the horrific nature of the murder and the participation of powerful people, the case got extensive media coverage and attracted public attention. Shahrukh Jatoi, the affluent feudal lord's son, and his accomplices shot and killed Shahzaib Khan, a 20-year-old student and the son of a renowned businessman, on December 25, 2012, outside a restaurant in the upscale Defense Housing Authority (DHA) neighborhood of Karachi. According to the police investigation, Shahzaib and one of Jatoi's friends had a small quarrel at a party that served as the inspiration for the murder. After the celebration, Jatoi and his friends followed Shahzaib's automobile while intoxicated. Jatoi and his colleagues approached Shahzaib when he stopped at a restaurant and shot him without hesitation ("Death sentence upheld for Shahzeb Khan's killers," 2017).

Many around the nation were outraged by the murder and demanded that Shahzaib and his family receive justice. When it was discovered that Jatoi and his cohorts had left the nation as soon as the murder was committed, the case drew even more attention. Jatoi and his cronies were sought after during a manhunt, and they were eventually apprehended in

Dubai and returned to Pakistan to stand trial. The FIR was lodged on 24,12,2012 under section 302 with the relevant provision of 6, 7 of the anti-terrorism act 1997. The author has taken Shahzaib Khan Murder Case as a reference to complete this research article.

Section 302 of PPC

In 1860 Lord Macaulay made a law for the welfare of the people of the subcontinent to protect her life and property and provide the adequate fundamental right on the behalf of British Government its main provision obtains from French law in 1947 Pakistan come into independence from Pakistan after partition obtain this law and different Government from time to time made amendments this is a mixture of English and Islamic law my research concern is section 302 of PPC. The purpose of this section is to protect the right to life of people this section deals with the punishment of murder our constitution of Pakistan 1973 provides the people of Pakistan with fundamental right section 9 provide the right to the life section 302 PPC is made for the punishment of murder and her relevant section 302A 302 B 302C are in the favor of this section (Act, 2019). In our religion of Islam, the blood of human beings is sacred The Holy Quran says, murdering a person is like murdering the whole of mankind. Quran further says that a person who commits a grave offense, particularly against the Muslim shell faces the eternal punishment of hell.

Classification of murder under Islamic criminal Law is; (I) Qatl-i-amd (II) Qatl-i-Khata (III) Qatl-isibhi-amd

Qatl-i-amd is relevant to the Shahzaib Murder case. The proof of Qatl-i-amd by the offender Iqrar are by the two adult male eye witness. The punishment of Qatl-i-amd is the Qiyas. But the aggrieved party willfully received the Diyat. The value of Diyat is equal to one hundred camels are equivalent amount of money.

The Holy Prophet Muhammad (SAW) said there are three options for the heirs of the victim. (I) To take qisas from the convict. (II) To take Diyat are blood money. (III) To pardon him.

SECTION 6,7 OF THE ANTI-TERRORISM ACT 1997

First, we see the background of this act and discuss will a relevant section. Pakistan from 2001 to 2009 faced peak terrorism in the era. Then many military operations are launched under different names. To control terrorist activities the Pakistani Govt made a law he passed anti-terrorism act 1997 which make sure the power agency to start operation against militant and arrested persons involved in terrorist activity are trials by a special antiterrorism court this act provides full security those people are judges who made trials are operation against the militant group. After a long discussion of background then we discuss the relevant provision of our research study case Shahzaib murder case. In FIR the provision of 6,7 antiterrorism act deals with the action of the person. The activities of a person come into the provision of 6 of the anti-terrorism act with punishable by the provision of 7 of the antiterrorism act (Forum, 2019).

The story of this case started after the murder of Shahzeb on the night of 25\12\2012 at the time of one 1:25 minutes at this time FIR was lodged by the complaint of Arungzaib father of deceased Shahzeb. The section mentioned in the fir is 302\354\109\216\34 PPc with section 7 ATA 1997 The question is arising that the proving of 7 ATA provision applies to the accused. The officer investigates the place of the incident and there is found there is a fear of stress in society. The people are feeling helpless and there is a disturbance in the society of the act of the accused. Due to this provision, 7 ATA are mentioned in the FIR. The SSP south north searched the accused and later arrested Siraj Ali talpur and Sajjad Ali talpur arrested and presented them in court .

2. Trial and the Procedure of the Case

The whole trial of this case was completed in 12 years and as a result, the accused are acquitted by the Supreme Court. Now the author discusses the trial of different courts.

2.1. Question of fact

This is an important part of the case the fact a decided what are the matters and what are and result. The circumstances evidence led to the fact the whole story of the matter is a fact and these facts are briefed by the parties in a court. The witness of the case also attested to the facts and record evidence in the court.

2.2. Question of law

In the view of facts, the court decided the question of law. What laws are implemented in this case and what are the SOPS fulfill for the implementation of the law? The question of law is always decided by the court and the court is bound to answer the question of law.

2.3. Trial in ATC

The challan commenced the trial. The ATC ruled after six months. 76\2013 trial court judgement Section 7 condemned Sharrukh Jatoi and Nawab Siraj Ali Talpur to death and Ghulam Murtaza Lashari and Nawab Sajjad Ali Talpur to life imprisonment. Each accused pays RS 500000 to the deceased's legitimate heirs. Sharrukh Jatoi was sentenced to three years of hard labour under Section 13(e) of the weapons ordinance. . HIGH COURT DECISION We reviewed the above legal arguments and supported by the enlightened and edified proclamations on direct equity in criminal situations. It is a well-established rule that every felony case has unique circumstances and is subject to the court's fulfilment based on evidence presented by the parties. F.I.R. is also used to start criminal proceedings and gather direct, unrestricted facts to eliminate the possibility of tale, counsel, or advantage. It is also a basis of the indictment case unless it is demonstrated that the investigating agency recorded an inaccurate version of the complainant to let the real guilty parties go free. Main data report. F.I.R. just starts the law. F.I.R. may be important evidence, but its lack of individual jobs doesn't constitute its originator a liar if the observer is shown to have observed the event. Segment 161, Cr. P. C. allegations are unproven. Talking about exclusion from police statements isn't inconsistent. Oversight of reality from the assertion is only valuable if it is of such significance that the observer would have likely made it and the cop would have definitely recorded it, had it been offered as strengthening expression by the source with various rendition values, not over an observer's assertion under Segment 161Crpc. The court's proclamation's evident contradictions, oversights, and embellishments of the observer are troublesome, but they don't negate the observer's proof. Variations that don't relate to the arraignment tale or the case's outstanding and noteworthy components may be neglected. The Court should consider only major discrepancies and disregard minor witness proof mistakes, which are common. . It just specifies the weapon, injury location, and time between injury and clinical examination. . The implicated evidence is not used to condemn him under Section 342, Crpc. for his explanation, and it cannot be used against him for his conviction. Giving a charge the benefit of the doubt was excessive, therefore there should be many criteria raising the issue. 37. Overall and the composite influence of the visual declaration of two observers demonstrate indisputably that enough of a chance profited in the questioning yet their declaration was not disturbed or shuddering by the significant points linked with this situation. Observers recorded under Segment 164 Cr. P.C were also extremely predictable in their appraisal of the boss retained in court and were tracked down and cemented in all material aspects during interrogation. Small contradictions and discrepancies that don't hurt the indictment case don't need to be fixed.

The minor inconsistencies or asserted enhancements having no fitness or ability to make any mark in the arraignment case can't be made the premise to repel or kill the entire proof, but top to bottom, breadth, and in the composite structure, the court needs to get the float of the validity of observers after taking into consideration the whole proof driven by the arraignment to decide whether it is untruthful, exploitative, and conniving? The proof's value is unaffected by minor errors. The law of proof, often known as the criteria of proof, governs the legal verification of facts. The trier of truth uses these rules to decide what proof is undeniable. Fiat Justitia means "let equity be done" in court. Proof enthusiasm comprises assessing the situation's proof's validity and consistency. To appreciate the visual statement, the court must recall that the appearance of such observer or observers at that time and spot of the incident isn't odd and they have no evident justification to dismiss the true guilty

parties and embroil dishonestly the condemned persons. Witness proof must be tested regardless of mathematical power. If a single witness's statement were credible, that would be enough to convict the accused. Validating proof wouldn't even come up. It is a solid legislation that requires the court to focus on quality rather than quantity of evidence to prove or disprove a claim. The aim motivates a person to perform a certain action. Yet, while purpose is a key factor, the adequacy or absence of reasoning may not affect a case's outcome provided there is proof of the conduct and the charged's accountability. The rule of worthwhile risk goes so far. Segment 34, P.P.C, if few persons would combine with normal cause to do a crime, everyone who helps finish their product would be equally responsible. Gathering the charges to perform the lawbreaker act and demonstrating constructive responsibility was the customary expectation. An crime under section 34, P.P.C. doesn't require a hand demonstration. On the off chance that a few people had the common goal of doing a specific crook act and if, in promotion of their common aim, they all consolidated and supported or abetted each other in the commission of a demonstration, then one of them could not actually do the demonstration, but if he helped by his presence or other demonstration, he would be held to have done that demonstrative. Is the offence promoting a typical article? Regarding the circumstance nearby, all appellants followed/pursued the departed and their arrival at the murder scene was validated by spectators with their employment, resulting in a young man's death. 39. We thoroughly reviewed the guard observers' declaration. Nawab Imad Ali Talpur, father of Siraj and Sajjad, said his children were studying at home on a significant day.

He promised the complaint that he would terminate Ghulam Murtuza Lashari from his two-day-old job tomorrow. He stated in his evaluation of his supervisor that he left Nation Club Condos for Hyderabad with the two children in the morning, but nothing was said regarding whether a worker was fired or whether he left the worker in the loft on 25.12.2012. He said he doesn't hate the arraignment witnesses during questioning. His proof is that the two youngsters were absent and did not commit any crime. The guard had no proof that the two youngsters were away and didn't leave their lofts with Shahrukh Jatoi and Ghulam Lashari in his silver car during the quarrel. If arraignment didn't feel it appropriate to add the proof of CCTV film of quarrelling to reveal the presence of appellants and perished Shahzeb being happy with the nature of visual declaration, then defence could have created CCTV film if any kept in the Nation Club Lofts at the time of quarrelling and when Nawab Imad Ali Talpur purportedly left with his children. Protective evidence was withheld.

Shahrukh Jatoi also sent his observer Izhar-ulHaq. The arraignment stated the charge, therefore the reprovved decision was fair. Nothing is on record to accept or question the presence of witnesses at the scene of an event or to consider or examine their claims as false. This is in line with the rule of falsas in uno, falsas in omnibus, which, in accordance with the aforementioned proclamation of the Summit Court, has become an important part of our criminal law that every court in the country must give effect to, follow, and apply in its letter and spirit. Let's talk about giving and taking. The record shows that for each Lawbreaker Allure, separate applications were filed under Section 345(6) Cr. P.C., and they were signed by both the lawyers for the appellants and the lawyers for the complainant. This was done because the legitimate heirs to Shahzeb, who died, released the appellants and said they would have no problem if the court cleared them. The Performa for dividing the difference under Qisas and Diyat Mandate was also written down and signed by the complainant Aurangzeb Khan (father of the deceased), Mst. Ambreen (mother of the deceased), Ms. Maha (sister of the deceased), and Ms. Parishay Waqas (sister of the deceased), as well as the appellants Shahrukh Jatoi, Nawab Siraj Talpur, Nawab Sajjad Talpur (all convicts). On July 1, 2014, the tradeoff applications were set to be decided when the learned counsel for the appellants mentioned the Hon'ble High Court's PLD 2014 SC 383 decision. In that case, the discipline was given under section 302 of the PPC and section 7 of the ATA Act, but the High Court accepted the tradeoff and changed the death penalty to life in prison. The matter was sent to the learned preliminary court with a request to look into it and make a report. Shahzeb's legal heirs gave statements that were checked by this court's Character Area The board of directors' plan (ISMS).

2.4. Chief Justice Saqib Nisar SO MOTU

On 12 February chief justice of Pakistan Justice Saqib Nisar took notice of why the Sindh high court acquits Sharrukh Jatoi and all co-accused and remove the antiterrorism act

provision The member of civil society of 430 members signs the application and filed an appeal against the decision of Sindh high court the chief justice of Pakistan convert this appeal into so motu notice On the day of proceeding the chief justice of Pakistan order to arrest the Sharrukh Jatoi and her co-accused and sent to jail then he directed the Sindh high court to decide the application within 2 months pending in high court on date 13\1\2018 put the name of accused into the ECL. The name remains in ECL until the high court decided the matter. Later chief justice of Pakistan on visit Karachi to hear the cases in the supreme court Karachi registry then he visited Landhi jail where a special visit to Sharrukh Jatoi's cell. Upon witnessing the facilities grant Sharrukh a large flat screen TV a fridge and a microwave. These facilities are not allowed for high profile accused he lives in a C-class facilities justice Saqib Nisar ordered him to transfer into a death cell and imitative incur who is responsible and dismiss the jail subsidence.

2.5. Final Judgment of The Supreme Court

A bench consists of 3 judges Mr. Justice Ijaz ul Ahsan, Mr. justice Munib Akhter, and Mr. justice Syed Mazhar Ali Akbar Naqvi hear the case and discuss the fact of the case. The learned counsel of the accused Sardar Latif Khosas brief the case and arise a question that this murder case has not come in the domine of anti-terrorism act 1997 of provision of 6 and 7 ("Shahzeb Khan Murder Case: Family Rejoices Over SC Verdict," 2017). In the dispute between two individuals, there is no intention to create fasad fil Araz. However the parties made a compromise in the shape of diyat to pardon the accused. The learned counsel provide the precedent in front of the court Akram vs The state and Muneer malik vs The state after hearing the whole facts and reading the case laws provided by the learned counsel during the proceeding the supreme court declared the judgment that all the appeals are allowed and the impugned judgment is set aside. Appellants are acquitted of the charge of antiterrorism provisions 6 and 7 and shall be released from jail and shall not detain in any other case.

3. INTERNATIONAL LAW ABOUT THE DEATH PENALTY

3.1. Capital Punishment In Islam and Bibal

In Islam, the death penalty is described for the crimes of; (I) Murder of a human being (II) Adultery by married people (III) Apostasy from Islam. These are the crimes for which Islam put the death penalty. The punishment of murder in Islam is of three types; (I) Taking the life of the murderer (II) Taking blood money (III) Forgiveness for Almighty Allah. There is free consent of the legal heirs of the deceased to choose the punishment for the murderer. In Quran Allah says about taking the life of a human being: Life is sacred and a gift from God and it is only God and not the human being who has the right to take it back. This willful taking of one's own life is considered a major sin in Islam. Committing suicide to save oneself from suffering is discouraged.

In the bible there is clear that takes a human life shall surely be put to death In bible says If any person kills another person the accused is put to death on the evidence of the witnesses In section 300 of IPC provide the punishment for the person who kills intentionally another person shall be punished to death or for life imprisonment, The Indian law and Pakistani law most similar because they adopt the British law which is made by the lord Macauley in 1860 when there is no separation their subcontinent the court system and the trial of the case similar in both countries The penalty law of the people republic of China as amended in 1997 and which provide death penalty to murderer are imprisonment of life for 10 years. The murder of a minor by intention provides a penalty of not less than 3 years. By a report survey, China executed the death penalty every year 800 people did not tell the exact number because this is a state secret.

3.2. Execution Of the Death Penalty by Different Countries

Different countries adopted different ways of executing of death penalty When all the application of the accused a dismissed and the last chance of appeal is to file an appeal to the president and this appeal is rejected the Magistrate order the death warrant. When the death warrant is signed by the Magistrate. the criminal separate from the others criminals. He was sent to a separate room. He lives alone for 7 days the security of the room a tight and one soldier outside of her room performs duty 24\7 hours. The last meeting is held to

meet his family after the last meeting on next morning at the time of 4 am bring into the (pashai Gagut) area where he is hanged in the next few minutes a doctor a Magistrate and a jail officer are also available at the place of this time. Security is on high alert the process of execution is completed. The doctor attested the death of the criminal and her corpus was given to the legal heirs of the criminal. This is the whole process of execution of the death penalty. In the USA execution of the death penalty by five different methods: (I) Hanging (II) Electrocution (III) Gas chambers (IV) Firing squad (V) Lethal injection. Those above methods are used in the USA but nowadays the common and easy process is a lethal injection. Different states of America use lethal injection for the death penalty. This injection quickly works and the person covert into death easily. The Saudi justice system is based on shariah. He adopted the Islamic principle in the execution of the death penalty when all the legal procedures are complete the execution of the death penalty is performed. Saudi perform public execution they announce the execution date and the people gathered in the place. They behead with a sword publicly and a doctor confirms death. The whole procedure of execution is done at the time of 9 am in 2009 the Saudi court ordered the criminal to hang in a public place by a beheaded body.

However, In a case involving the 2009 murder of two people, the Pakistani Supreme Court overturned the death sentence imposed under the Anti-Terrorism Act. The prosecution's evidence was deemed insufficient by the court to establish the standard necessary to establish guilt under the Anti-Terrorism Act.

The court added that the Anti-Terrorism Act should only be strictly enforced in situations when there is undeniable proof of terrorism, and that it should not be utilised inappropriately in situations where terrorism is not present ("Supreme Court Sets Aside Death Penalty Awarded Under Anti-Terrorism Act," 2022).

The ruling emphasises the need of respecting the law and making sure that the evidence is sufficient to support a conviction. It also emphasises the necessity of using anti-terrorism laws sensibly and responsibly in order to prevent their abuse and misapplication.

3.3. Views of the United Nations About the Death Penalty

The united nation system UNODC (2016) apply and demand that recognized country to ban the death penalty because this is against the dignity of human and the fundamental rights of human being. The UN demands the member state not practice the death penalty. Many international instruments discourage this practice. The UN general assembly adopted the resolution to stop the member countries from executing the death penalty. The convention of the right of child CRC shall ensure the recognized state does not execute the death penalty beloves the age of 18 years. The 170 members state of the United States has abolished the death penalty the human being. The object of the UN human rights office is to protect and promote human rights and ban the universal death penalty. Under the universal declaration of human rights adopted by the UN in 1948. To abolish the death penalty because this is against human rights international law says to ban the death penalty restricted to serious crimes. International law says the death penalty is cruel inhuman and degrading punishment. The 49th session of UN human rights was held from 28 February to first April 2022 They talk many hours about the abolition of the death penalty. The death penalty was the issue discussed during the debate and require to take the attention of the council. A UN member state during a discussion said the death penalty of human rights and the right of prisoners. They are mentally disturbed when they hanged in what time did 70% of the country are abolished capital punishment? In the survey of 2019, there is 5% of countries made the execution of the death penalty.

4. Critical Analysis of This Case

Wealth is power and the execution of wealth is more powerful. A person who has wealth is above the law. There are three classes of people lower, middle, and elite class. As this sequence law also have three class poor different middle for some different and elite different. An example in this case Sharrukh Jatoi spent 7 months out of jail in a private hospital. His family arranges the whole hospital on rent and he lives in this hospital like a house. The sources of the home department told a senior person of the Sindh government to play an important role to transfer the convict accused of Sharrukh jatoi into the hospital.

According to a secret source of the official Sharrukh jatoi live 20 months out of the jail and live a lavish life. The jail authorities say there is a backbone problem with the Sharrukh jatoi and some health problems but this is not correct there is a political approach to facilities for the convicted person.

4.1. Role of Education

Education plays important role in the development of society. it teaches moral ethics and explains what is wrong and what is true. The civilized nation developed on the base of a good education. It teaches morality and the well-known principle of life. Islam is a complete code of life our religion in force to learn the well-known principle of life but unfortunately, our education system model is like a business with no focus on character building it only gives skill education where later you sell her skill and obtain the necessary things of life this is our education system. The institution of our country is run by these educated people but the corruption ratio number of our country is 140 out of 180 this is our education. Now we discuss the example of Sharrukh jatoi who studied in Australia in the program of O LEVEL this is a highly qualified degree in our country but the character of Sharrukh jatoi is that he murdered Shahzaib only a minor dispute. His ego is above the life of any person who hurt her ego he lost his life. There is no fear of the law if you have a billionaire no barrier of law creates any disturbance in your way. You do everything.

4.2. Facts About the Compromise of Parties

When ATC confirmed the death penalty for Sharrukh Jatoi and her co-accused. The sources of social media and family sources tell. The jatois family pressurized the deceased family for settlement. They threatened the deceased family they used political tools for the statement Shahzaib family is decent and well-educated different people threatened the Shahzaib family and pressurized them to make a settlement and take blood money. one of her sisters tells in the interview about the fact of settlement. she said there is huge pressure from political and other official people. Then we decide to make a compromise and forgive Almighty ALLAH. In Islam, there is a law of Diyat and there is a complete procedure described for the victims. The parties have independent consent to forgive the accused but in our country in the shape of Diyat to pressurized the people to made compromised according to the will of the accused parties because there is no way to retain against his action. Rule of law and equity of law it is only mentioned in the white paper and no execution. According to article 25 of the constitution of Pakistan. Every citizen is equal before the law without any discrimination of color creed or race but their world mention in a white paper only there is no implementation it applies to the pure people of the country. Sharrukh jatoi leave in a C-class prisoner room where all the facilities of life are available on the other side a criminal sentenced according to section 302 leaves in a poor jail room and low-quality food is available no medical care or no high-profile advocate is available for advocacy some of the people is acquitted by the supreme court but they die during imprisonment. This is the gap of law between two classes of people.

5. Conclusion

After 10 years the trial of the Shahzaib murder case was completed and all the accused are released. This is a high-profile case chief justice of the supreme court take two times SO MOTO notice but this case was completed in 10 years this show how our judicial system works very fast all of the legal and illegal ways use in this case the trial were completed in 10 years. The speed of our judicial system is measured by this case and the quality of justice is determined very poor. The world justice project published reports in October 2021 our country is 130 ranks out of 139 this is a question mark on our judicial system. Does the question arise what are the barriers to delay justice in our country? the answer is that corrupt political influences and the protest of BARS are the factors that affect the justice system. In foreign countries every year there is the accountability of judges but in our country, there is no accountability There is no rule of law every person thinks he is above the law have any financial or political power during the proceeding of the Shahzaib murder case the Sharrukh made victory sign when he comes out the court this victory sign always remains a question mark on the face of our judicial system. The conclusion is that we live in ancient times where

there are two separate justice systems one is for the poor and one is for the rich and this is the base of the death of our judicial system.

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