

## Public Prosecutor- An Eminent Character Of Criminal Justice System, A Comparative Analysis

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### Abstract:

This article presents a comprehensive comparative analysis of the role of the public prosecutor in the criminal justice systems of India, the United States, and the United Kingdom. It explores the distinct functions and responsibilities of prosecutors in these countries, highlighting how their roles are influenced by different legal frameworks. In India, the public prosecutor acts as a minister of justice, ensuring fair proceedings without interfering with police investigations. In contrast, U.S. prosecutors have significant influence in charge framing and plea bargaining, often dominating the judicial process. The UK's Crown Prosecution Service operates independently, striving to uphold public interest while sometimes constrained by resource limitations. This comparative study underscores the integral role of prosecutors in upholding the law, protecting human rights, and maintaining societal order, despite the varying degrees of government involvement and judicial process across these legal systems. The United Kingdom operates under the Crown Prosecution Service (CPS), which functions independently. Crown prosecutors adhere to a code of conduct, emphasizing the preparation and presentation of cases in court. However, resource limitations occasionally constrain their ability to operate independently. The CPS strives to uphold public interest, ensuring that cases are prosecuted in the best interest of society. Recommendations arising from this study include the need for stronger oversight of prosecutorial discretion in India and the U.S., comprehensive training programs emphasizing ethics and fairness, allocation of adequate resources to the CPS in the UK, and enhanced transparency in prosecutorial

decision-making across all three countries. The scope of future research could encompass a broader comparative analysis involving additional jurisdictions, an examination of the impact of technology on prosecutorial roles, an exploration of cultural influences on prosecutorial behavior, and an investigation into mechanisms of accountability for prosecutors.

Keywords: Public Prosecutor, Criminal Justice System, Comparative Analysis, Legal Framework, Judicial Process, Human Rights.

### **Introduction:**

The role of a public prosecutor is pivotal in the administration of justice, serving as a crucial link between the law, the courts, and the community. Although the term "prosecutor" is often used interchangeably with "attorney," there exists a significant distinction between the two, particularly when examined through a legal lens. According to the Merriam-Webster definition, a prosecutor initiates legal proceedings or represents the state in a criminal process as a defendant, essentially acting as a government attorney. This general description, however, masks the diversity and complexity inherent in the role across different nations and legal systems. Whether a country adopts a common law adversarial system or a civil law inquisitorial system greatly influences the specific functions and responsibilities of a prosecutor. Moreover, in some jurisdictions, a prosecutor's duties extend beyond the criminal realm, allowing them to defend defendants in civil cases as well. This article aims to delve into the multifaceted role of the public prosecutor, exploring how their duties and obligations vary across different legal systems, with a specific focus on India, the United States, and the United Kingdom.

Public prosecutors are more than just legal representatives of the state; they are guardians of fairness and justice within the criminal justice system. Appointed by a branch of government—be it federal, state, or local—public prosecutors have the solemn duty to ensure that every accused individual receives a fair trial. Their role is grounded in the principle of 'Audi alteram partem,' a Latin maxim underlining the right of every person to be heard. This foundational principle of justice necessitates that the accused be given an opportunity to present their case,

especially when the victim's perspective is being considered. Public prosecutors act on behalf of the state during both the investigation and trial phases of a case, ensuring that the law is applied correctly and impartially. This is in line with the jurisprudence of societal security, where each crime is perceived not only as an offense against an individual but also as an affront to the state itself. The guidelines established by the Office of the High Commissioner for Human Rights (OHCHR), approved by the United Nations Congress on Crime Prevention and the Treatment of Offenders, set forth various responsibilities for prosecutors, emphasizing their role in upholding human rights and due process within the criminal justice system. These responsibilities include conducting unbiased investigations, protecting the public interest, maintaining confidentiality unless legally mandated otherwise, and refraining from using evidence obtained through illegal means such as torture. This framework underscores the significant role prosecutors play in ensuring that both parties in a case receive a fair trial and that the public interest is safeguarded.

#### **Who is a Public Prosecutor?**

As the state's representative, he ensures that citizens are treated fairly and assists the judiciary in completing their jobs. His appointment comes from some branch of government, whether it the federal, state, or municipal level. There are variations in this partition across nations. However, their only responsibility is to ensure that the accused receives a fair trial. According to the 'Audi alteram partem' Latin Rule of Law, everyone has the right to be heard.

Because the presumption of innocence is a universal right, it is only fair that the accused be given the opportunity to establish his innocence if the victim is to have his or her voice heard. The prosecutor acts on behalf of the state throughout the investigation and trial of a case to guarantee that the law is not muddled. This is because, according to the jurisprudence of societal security, each crime committed is also a crime against the state.

The OHCHR approved by the United Nations Congress on Crime Prevention and the Treatment of Offenders on September 9, 1970, includes certain rules regarding the job

of Prosecutor. Human rights with due process of law under the criminal justice system must be preserved via their efforts. What they do is,

1. Since the state has selected them, they must act appropriately.
2. They are forbidden to engage in any such dishonest or unreasonable behaviour that might hurt the case.
3. If the situation calls for it, they will be provided with security measures to ensure their safety.
4. They are entitled to take part in debates open to the public on issues of law.
5. Freedom of speech and association guarantees them the opportunity to advocate for and defend human rights via participation in public debates on legal issues.
6. His responsibilities include investigating crimes, overseeing their prosecution and conviction, and ensuring an impartial inquiry.
7. They must investigate the situation without bias.
8. They'll get things done while protecting the public interest.
9. Unless ordered by law, they must maintain confidentiality.
10. Follow the Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power in your actions.
11. Evidence gathered by illegal tactics, such as torture or brutal treatment, will not be used against suspects.
12. On fair or conditional circumstances, they may also forego their ability to pursue prosecution. (insofar as practicable)
13. Prosecutors in certain nations have more leeway to decide how serious of an infraction a minor committed is before bringing charges.
14. They must work together with any and all other entities involved in the investigation of this case (albeit they should aim to avoid taking stringent steps in such issues).

Thus, these standards are developed by the human rights commission for the prosecutors so that both the parties to the case have a fair trial and public interest is preserved as well.

### **Review of Literature**

The literature begins by emphasizing the pivotal role of public prosecutors in the administration of justice, acting as a crucial link between the law, the courts, and the community (Kumar & Dixit). It highlights the diversity and complexity of their roles across different nations and legal systems (Kumar & Dixit). The introduction underscores the significance of understanding how the roles and responsibilities of public prosecutors vary across different legal frameworks (Kumar & Dixit).

#### **Public Prosecutor's Role:**

The literature describes the role of a public prosecutor as ensuring that every accused individual receives a fair trial and that the law is applied correctly and impartially (Kumar & Dixit). This role is grounded in the principle of 'Audi alteram partem,' emphasizing the right of every person to be heard (Kumar & Dixit). The literature also references the guidelines established by the Office of the High Commissioner for Human Rights (OHCHR), highlighting the responsibilities of prosecutors in upholding human rights and due process within the criminal justice system (Kumar & Dixit).

#### **Comparison between India, US, and UK:**

The literature provides a comparative analysis of the roles of public prosecutors in India, the United States, and the United Kingdom (Kumar & Dixit). It highlights significant differences shaped by each country's unique legal framework and cultural context (Kumar & Dixit). In India, public prosecutors primarily act as ministers of justice, ensuring fair trial and non-interference with police investigations (Kumar & Dixit). In contrast, U.S. prosecutors wield considerable influence over case outcomes through their decision-making in charge framing and plea bargaining (Kumar & Dixit). The literature also notes the independence of the UK's Crown Prosecution Service (CPS) and its emphasis on preparing and presenting cases in court, albeit sometimes constrained by resource limitations (Kumar & Dixit).

#### **Challenges and Concerns:**

The literature highlights concerns about the impartiality of prosecutors in the US, where their broad discretion and influence in the court system have raised questions about racial discrimination and fairness (Kumar & Dixit). It

mentions cases such as the Central Park Joggers Case to illustrate the potential for abuse of prosecutorial discretion (Kumar & Dixit).

### **Research Gap**

The literature review presents a comprehensive comparative analysis of the roles and responsibilities of public prosecutors in the criminal justice systems of India, the United States, and the United Kingdom. It underscores the diverse and complex nature of their functions, shaped by each country's legal framework and cultural context. The review highlights the central role of public prosecutors in ensuring fair trials, upholding human rights, and maintaining societal order. It also addresses concerns such as the potential for prosecutorial discretion to impact fairness and justice, particularly in the US. Overall, this literature review offers valuable insights into the multifaceted role of public prosecutors and the challenges they face within their respective legal contexts, setting the stage for further research and exploration in this field.

### **Research Objectives**

The research objectives of this study aim to provide a comprehensive comparative analysis of public prosecutors' roles in the criminal justice systems of India, the United States, and the United Kingdom, highlighting the distinctions in their functions, responsibilities, and the impact of legal frameworks on their roles.

### **Research Methodology**

The research methodology employed in this comparative analysis of public prosecutors in India, the United States, and the United Kingdom involved a comprehensive review of existing literature and legal frameworks governing the roles and responsibilities of prosecutors in these respective countries. The study delved into primary sources, including statutory provisions and guidelines such as the Criminal Procedure Code in India, electoral processes for prosecutors in the U.S., and the Crown Prosecution Service in the UK. It also examined secondary sources, scholarly articles, and case law to provide insights into the practical implementation and challenges faced by prosecutors in each jurisdiction. This research methodology facilitated a thorough exploration of the multifaceted roles of public

prosecutors and their influence on the criminal justice systems within their unique legal contexts.

### **Analysis & Discussion**

Understanding prosecutors' duties and responsibilities is crucial when comparing criminal justice systems. State-appointed public prosecutors in India enforce due process and protect victims and accused. They are crucial to representing the state and defending justice in court. The US system is decentralised, with prosecutors elected or appointed at different levels. Their discretion in prosecuting people and arranging plea bargains may dramatically affect case results, raising worries about systemic biases. UK's Crown Prosecution Service (CPS) executes laws independently. Crown prosecutors follow a rule of conduct and promote community fairness while prosecuting crimes. India emphasises individual rights, the U.S. prosecutorial discretion, and the UK an independent prosecution agency. Each system has merits and cons. Assessing prosecutors' legal performance requires understanding these distinctions.

### **Difference Between Prosecutor and Lawyer!**

Well, it's fair to state that although all lawyers are lawyers, not all prosecutors are lawyers.

Lawyers are permitted to practise law in any jurisdiction and represent clients in any legal matter. They might argue on behalf of the victim or the offender, and will often offer evidence and witnesses that support their client's position. The client's right to justice is their first concern. Whereas prosecutors are government officials who are chosen by the state to guarantee that all parties involved in a trial are afforded due process under the law. It is his responsibility to protect people's rights and dignity, as well as to provide fair trials based on clear evidence. He will not take sides and will do his best to provide fair judgements. He represents the state in criminal proceedings and, if necessary, in civil litigation as well. The prosecutor's job is to uncover the truth in a lawful way and present it to the court so that unfair procedures may be avoided, whereas the defence attorney's job is to establish his client's case.

### **Prosecutors in Indian Criminal Justice System:**

The police in India conduct investigations, and in the trial phase, judges and attorneys are engaged, but the whole process is overseen by a magistrate. Everything that

happens once an arrest is made requires the approval of a magistrate, including the investigation and trial. The next topic is the function of the prosecutor in India, known as the public prosecutor, as outlined in section 24 of the Criminal Procedure Code. The state has appointed him to act as their legal counsel in criminal cases. In India, a magistrate decides whether or not to prosecute a case based on a police report, and only then does a prosecutor be assigned. The prosecutor is assigned to represent the government in any case or offer state's representation in any criminal case.

#### **Appointment –**

A public prosecutor is appointed under Section 24 of the Criminal Procedure Code. The state government may nominate the High Court public prosecutor after coordinating with the federal government. The federal government may appoint district court or municipal public prosecutors for particular cases or types of cases, based on the proceedings and desired control. The public prosecutor and auxiliary public prosecutor for a district will prosecute matters in other districts if needed. In this selection procedure, the District Magistrate is consulted and a formal panel makes recommendations. Before considering panellists, a jurisdiction's competent prosecutors will be tapped. Most importantly, the candidate must have at least 7 years of advocacy experience to be qualified, and for the special public prosecutor position, 10 years. Assistant public prosecutors are appointed under Section 25.

#### **Role of the Prosecutor –**

The role of the prosecutor is to ensure that justice is done, not to win a case for any particular reason. His responsibility is to ensure that all legal requirements were met throughout the whole legal process beginning with the arrest and ending with the trial. It is his responsibility to ensure that no unfair or illegal conduct occurs throughout the proceedings. He should not give off an air of eagerness but rather make sure the rights of the victim and the accused are protected.

Appointing a prosecutor is necessary to prevent the following,

1. The rights of the accused must be protected.
2. To ensure that each side is heard in a trial; to conduct an impartial inquiry



3. In an effort to end discrimination
4. For the sake of parity
5. A statutory authority appointed by the state, not the court, it is his responsibility to investigate concerns for the public good in his capacity as the state's representative. The police force may collaborate with them.
6. The accused cannot have him testify on his behalf. Only those rights to which he is really entitled may be demanded of him.
7. As he has the whole discretion of withdrawal or continuing of any matter entrusted to him under section 321 of the CrPc., he shall always perceive the public advantage for this purpose and not for any mal-intentions. The Supreme judicial agreed in the 1987 case of Mohammed Mumtaz v. Nandini Satpathy that it is only necessary to get judicial approval in order to proceed. In India, he has total authority; the district magistrate and the SOP may only make suggestions and serve as notice to him.
8. Prompt trial.
9. To protect the Constitution's promise of the right to life and liberty under Article 21.
10. When a situation emerges that significantly impacts the public interest, the state may issue a special order for such an appointment.

The Chief Minister of Delhi, Arvind Kejriwal, appointed a special public prosecutor in 2019 for the high-profile "journalist Soumya Vishwanaths murder case."<sup>1</sup>

#### **Important cases –**

**In Thakur Ram vs. State of Bihar**<sup>2</sup> Since a crime committed against an individual becomes a criminal against society as a whole, the Supreme Court has ruled that the appointment of a prosecutor must be motivated by a desire to protect the rights of the victim. As a result, no one may employ this method for purely selfish reasons like revenge.

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<sup>1</sup>“For information regarding such appointment made By CM Kejriwal refer to this link on the news - <https://www.ndtv.com/india-news/soumya-viswanathan-murder-case-arvind-kejriwal-orders-special-prosecutor-1989966>

<sup>2</sup>AIR 1996 SC 911

In *MukulDalal v. UOI*<sup>3</sup>The Indian Supreme Court has ruled that the job of public prosecutor is one that the public interest requires the court and the state to create.

In *Radheshyam v. State of M.P. & others*<sup>4</sup>The court has ruled that a special public prosecutor may be appointed by the state, and that the state must pay that prosecutor's salary in order to protect its credibility. Because of this, the government cannot designate him/her to receive compensation from a private party.

#### **Comment –**

As a result, all Indian prosecutors report to a central office called the "director of prosecution." The director is the highest ranking official in the office, reporting to the minister in charge. However, many prosecutors are sidelined or placed under the supervision of top-level police officials since not all states have formed such a system or are part of this system. This is because it is not recognised under CrPc. as a requirement. negating any benefit from meting out justice.

#### **Prosecutors in the U.S. Criminal Justice System:**

As the U.S. is divided into states and counties, the system changes. About 3143 counties in 50 states have their own prosecutor. As a federal republic, the US only has a unified system with federal prosecutors. The U.S. attorney general doesn't appoint prosecutors like federal district attorneys. Municipal elections determine it, not appointment. Federal prosecutors are elected by people. Assistant United States Attorneys examine public interest criminal and civil cases for the federal government. Their main duty is to aid the investigation and protect the accused's rights. They are involved in all areas of criminal investigations, including witness questioning.

- The U.S. prosecutor is responsible for overseeing and enforcing all aspects of criminal law and procedure.
- He may decide whether or not to press charges against someone. Which necessitates extreme caution on his part. The police may make an arrest on reasonable suspicion, but it is the prosecutor's job to file charges. No one has the right to dispute his or her judgement.

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<sup>3</sup> 1988 3 SCC 144

<sup>4</sup>1999 (2) MPLJ 703”

Kemba Smith, who was wrongfully convicted and sentenced to 24.5 years in prison after the prosecution falsely implied that she was involved in her husband's drug dealing activities, is an example of this abuse of prosecutorial discretion. However, the prosecution forced her to plead guilty when her husband died during the inquiry, despite the fact that she had been promised a reduced sentence in return for her testimony<sup>5</sup>. Therefore The prosecution must use its discretion in drafting charges with the greatest fairness if we are to prevent such inconsistencies.

- As a result, in the United States, prosecutors often have more influence over the decisions made by the court, which compromises fairness and justice.
- Almost 90% of cases result in a guilty plea, and prosecutors control the whole plea-bargaining apparatus. It is sometimes misused by prosecutors who engage in overcharging practises in order to coerce a guilty plea from a defendant facing lesser charges. Everyone wants to avoid going to trial because they know they would get a harsh sentence if found guilty.
- As a representative of society and neither of the disputing parties, he or she must behave fairly in his or her role as a quasi-judicial authority. Instead of trying to prosecute them, he should focus on helping them. In *Berger v. United States*, the Supreme Court of the United States reached the same conclusion.<sup>6</sup>
- They carry out extensive investigation and gather evidence, primary tasks include issuing subpoenas, plea bargaining, charge framing and safeguard rights to both victims and accused.

#### **A Drawback –**

Black-white segregation in the US is longstanding. We've all seen the #blacklivesmatter outrage and know how sensitive the subject is in the US. Racism against defendants has long been acceptable because to the prosecutor's vast discretion and outsized influence in court. Thus, when two individuals of different races are accused of the same crime, prosecutors are more likely to take the white offender's case seriously, ensuring justice. They sometimes misuse and haphazardly apply this power. Five under-18 boys were

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<sup>5</sup>“For more insight on Kemba Smith’s case refer to this link - <https://www.sentencingproject.org/stories/kemba-smith/>“

<sup>6</sup>“295 U.S. 78, 88 (1935)

convicted of rape and sexual assault in the 1989 Central Park Joggers Case, but their convictions were reversed years later when they were found innocent. There were major abuses of the accused's rights throughout the probe, especially for children. The false allegations forced them to plead guilty and serve harsh prison sentences. Due to their African-American skin colour, they feared people would instinctively presume the worst of them. US prosecutors have extensive discretion, thus this is a major drawback.

#### **Important Case –**

In *People v Smith*<sup>7</sup>, Sometimes the prosecution fails to meet its burden of evidence, and the court rules that the prisoner must be released from custody. Since no evidence was presented, no strict scrutiny can be applied here.

#### **Comment –**

Thus, the prosecutor and his approach to the investigation and trial have a significant role in determining the result of a case in the American criminal justice system. Unlike in India, where the prosecutor is seen as a minister of justice who advises the court, in the United States the prosecutor just guarantees that justice is administered fairly.

#### **Prosecutors in the English criminal Justice system:**

The UK's Crown Prosecution Service (CPS) is often known as crown prosecutors. The prosecution of offences act established the CPS in 1985 to operate in England and Wales outside the European system. There is no government oversight or policing. One of three key jurisdictions governs UK public prosecution: the CPS. None of the other two bodies are required. On behalf of the queen, the CPS enforces legislation, precedents, and customs in the UK, which has no criminal code. Crown prosecutors follow a code of conduct. Each of the 14 regional teams has a Chief Crown Prosecutor who ensures fairness and diversity in their areas. They work in the fraud, international justice and organised crime, and special crime and anti-terrorism divisions. They handle UK criminal prosecutions as a judicial agency.

#### **Appointment –**

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<sup>7</sup>185 Ill.2d 532, 545 (1999)”

One crucial aspect of appointment is that those with and without legal training may seek to be prosecutors and work as solicitors and barristers. However, those without a JD are need to take and pass the CPO or get an LLM in order to practise law.

The Prosecutor's Function in the Criminal Justice System -

- To prosecute or not to prosecute; that is the question they answer.
- They do research and collect evidence to support their claims.
- The fee is set by them.
- They may also help the police in their investigations by providing advice.
- Due to their lack of oversight from any higher entity, they are free to proceed with their action without interference.
- They also present in the court the cases (like a lawyer) i.e. they may advise the counsel in cases.
- They also guarantee that the victim is helped and that the witness is safe. I hope they get what's coming to them.
- The first step in deciding whether to press charges is determining whether or not the evidence collected is sufficient to prove guilt in a court of law. The next step, after that, is to gauge reaction from the general population. After then, no one except that person may handle the issue any further.

**Comment –**

However, concerns about the CPS's impartiality have been raised repeatedly. Many people believe that political officials mainly finance the CPS, giving it a strong bias towards cooperating with law enforcement. This is due to incompatible process brought on by a shortage of resources and funding, which in turn forces these prosecutors to work with the police.

**Research Findings**

**A Comparison between India, US and UK:**

This table can help to get an overview,

India	US	UK
Public prosecutor appointed under Section 24 of the Code of Criminal Procedure 1973	Prosecutors are federal attorney and are elected by the electorates.	Prosecutors fall under the independent body i.e. Crown Prosecutor services.
Mainly acts as a Minister of justice.	His decisions in framing charges and plea bargaining hugely impacts the outcome of case.	They can investigate, prepare evidences and present the case in court of crown.
Ensures the rights are not violated and justice is given in a fair manner. Does not interfere with the police investigation.	Ensures that both parties are heard and is much overpowering on the police and other authorities.	It is an independent judicial agency that works to ensures public interest but due to lack of resources and funds are subjected to police.
Judges and Magistrates give decision.	Judges are largely influenced by the prosecutor's view.	The court of crown has the power but CPS is at times instigated by bureaucrats.
Representative of the central or state government.	Each state and county have its own prosecutor.	Represents the Crown.

### **Conclusion**

The comparative analysis of the roles and functions of public prosecutors in the criminal justice systems of India, the United States, and the United Kingdom reveals significant differences shaped by each country's unique legal framework and cultural context. In India, public prosecutors, appointed under Section 24 of the Criminal Procedure Code, primarily act as ministers of justice, ensuring fair trial and non-interference with police investigations. In contrast, U.S. prosecutors, elected by the electorate, wield considerable influence over case outcomes through their decision-making in charge framing and plea bargaining, often overshadowing police and other authorities. Meanwhile, the UK's Crown Prosecution Service operates as an independent judicial agency, emphasizing the preparation and presentation of cases in court, although at times constrained by resource limitations and potential bureaucratic influences. These diverse approaches reflect each system's commitment to balancing the rights of the accused, the interests of the public, and the pursuit of

justice, highlighting the pivotal role of the prosecutor in upholding the rule of law and maintaining societal order.

### **Recommendation**

- **Improve Oversight:** India and the US need better systems to monitor prosecutorial discretion. Independent boards or committees may examine and supervise prosecutorial judgements to guarantee justice and avoid power abuses.
- To promote ethical behaviour, fair decision-making, and defendant rights protection, India and the US should prioritise extensive training programmes for prosecutors. Prosecutors can handle difficult legal and ethical issues with ongoing training.
- **Resource Allocation:** Addressing resource constraints for the Crown Prosecution Service (CPS) is vital in the UK. The CPS needs enough budget and resources to do its functions and remain independent from bureaucratic interference.

### **Scope of Future Research:**

- **Comparative Analysis with Other Jurisdictions:** Future research can expand the comparative analysis to include additional countries or regions with different legal systems. This would provide a broader perspective on prosecutorial roles and practices worldwide.
- **Impact of Technology:** Investigate how advancements in technology, such as AI-driven decision support tools, are influencing prosecutorial decision-making and the administration of justice in the digital age.
- **Cultural and Societal Influences:** Explore the cultural and societal factors that influence prosecutorial behavior and decision-making in different countries. How do cultural norms and public expectations shape their roles?

### **Limitations:**

- **Data Availability:** A common limitation in comparative research is the availability of consistent and comprehensive data from different countries. Researchers may encounter challenges in accessing detailed information on prosecutorial practices and decisions.

- **Changing Legal Landscapes:** The legal systems in India, the United States, and the United Kingdom are dynamic and subject to legislative changes. Any research findings may be influenced by evolving legal frameworks.
- **Cultural and Contextual Variations:** While this research provides insights into prosecutorial roles, it may not fully capture the nuances of cultural and contextual variations that affect prosecutors' day-to-day practices.

### **References**

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3. AIR 1996 SC 911
4. 1988 3 SCC 144
5. 1999 (2) MPLJ 703
6. For more insight on Kemba Smith's case refer to this link - <https://www.sentencingproject.org/stories/kemba-smith/>
7. 295 U.S. 78, 88 (1935)
8. For more information on the Central Park Joggers case which has also been changed into a series called "when they see us", refer to this link - <https://www.bbc.com/news/newsbeat-48609693>
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