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# **THE COMPARATIVE ANALYSIS OF THE CRIMINAL PROCEDURE CODE OF INDIA & UNITED STATES OF AMERICA**

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## **ABSTRACT**

In every society, there are laws which provide specific and definite rules for regulating the behavior of its citizen as well as to control their conduct. If we talk about the criminal laws which are being enacted for punishing the person who had commit any wrong in the society. Its aim is to prevent the crimes and to punish for the offence being committed. For Eg. Bhartiya Nayay Sanhita, 2023 earlier Indian Penal Code, 1860 is the statue on criminal law especially dealing with the penal provisions. But at the same time these laws are needed to be aided by another law which provides for the procedure to carry out the administration of criminal justice. For Eg. Bhartiya Nagrik Suraksha Sanhita, 2023 earlier Criminal Procedure Code which provides for the law relating to the criminal procedures. These laws plays a vital role in carrying out the administration of criminal justice i.e. hierarchy of judges, public prosecutors, jurisdiction of courts, arrest and detention, reporting as well as investigation of offences, framing of charges, stages of trial and many more. India, world's biggest democracy as well as the USA, world's oldest democracy, both have their own criminal procedure codes, so as to provide the procedure to handle with the criminal matters in the country. India has a unified single criminal procedure code applicable in the whole parts of its territory, including the states as well. However, in USA, due to its strong federal structure there were different criminal procedure codes applicable in the national level as well as the state level. As both nations have a very strong judicial administration system. So, this research is going to have a comparative analysis of the criminal procedure code of both the countries.

**Keywords:** - Criminal Procedure Code, Criminal Law, Justice, Comparative, Code, Sanhita, Rules.

### ❖ **INTRODUCTION:-**

The criminal procedure codes in both the countries are foundational to their legal systems and outline the steps for investigating and prosecuting the crimes. As mentioned earlier India has a unified single criminal procedure code i.e. Bhartiya Nagrik Suraksha Sanhita, 2023 applicable in the whole parts of its territory, including the states as well. However, in USA, due to its strong federal structure there were different criminal procedure codes applicable in the national level as well as the state level. There is U.S. Federal Rules of Criminal Procedure, 1946 as amended in 2020 which is being applicable to the federal courts in the USA.

### ❖ **HISTORY OF CRIMINAL JUSTICE ADMINISTRATION IN INDIA:-**

The idea behind having a criminal procedure code is not new for our country as when we look into its history, we can find that even during the ancient period, the criminal justice system has some sort of regulations for determining the guilt of the accused. Earlier there was rule of divine and people were usually governed by the principles of natural law. They believe that there each and every action is witnessed by the divine. The crime rate was usually low and the people were of moral character. So, there was a fear among people about committing any offence but later on when the people become less moral, the crime rate increased which was tackled by the concept of collective participation in deciding the guilt of the accused. There was also a concept of “Shrap” and “Praischit”. People often visited to the saints for deciding any matter. The role of Brahmins was increased for deciding any matter and for interpreting the Veda’s and other religious texts. With the passage of time a need for strong institutional structure arises which establishes the rule of kingship under which the king decides the guilt of the accused and also punishes him for the offence committed by him. Under the Hindu religion, there was a concept of “Dharma”. There were four Vedas i.e. Rig Veda, Sam Veda, Yajur Veda and Atharva Veda. These were often regarded as the source of “Dharma”. There was also “Manusmriti” also known as “Manava-Dharamsashtra” written by Manu, which was often regarded as an earlier text on the codified law made by Manu. It usually prescribes for the ten essential rules of Dharma i.e. steadfastness, self-restraint, forgiveness, purity, control of sense-organs, application of intellect, non-stealing,

truthfulness, self-knowledge, freedom from anger<sup>1</sup>. Beside these all, there were various other ancient texts such as Sruta Sutra, Griya Sutra and Dharam Sutra which specially deals with the civil as well as criminal law. These were often regarded as the earlier texts on the Indian criminal justice system. Further there were various Upanishadas and the Puranas. Later on the Arthashastra written by Kautilya (300BC) becomes a primary source of law, especially during the Maurya period. The Arthashastra is divided into 15 book titles including 150 chapters and 180 topics dealing with subject of training, justice, war, means of capturing a fort, regulating the economy, rules as to prostitutes etc. The dandaniti was another ancient text which provides for the policy of punishment to the accused. Later on with the invasion of Muslims, there was introduction of Mohammedan Law having four sources i.e. Quran, Sunna, Ijmaa and Qiyas. But usually both the Hindu and Muslims were often governed by their own religious personnel laws. The Mughals also established their courts. The Mughal Emperor also used to sit in his King's Court often termed as Diwan-iMazalimat accompanied by a Qudia, a Mufti, a Pandit and a Kotwal. Later on after the arrival of Britishers. The Charter Act of 1833 was introduced to establish the First Law Commission in India which was headed by Thomas Babington Macaulay from 1833 to 1840 which submits its famous report known as Lex Loci Report. Later on the four reports were submitted by the second commission in 1853 under the headship Sir John Romily. Finally, the Indian Penal Code, 1860, Code of Criminal Procedure, 1861, Indian Evidence Act, 1872 came into force during the period 1862-1872 i.e. often known as Golden Age of Codification. These laws were remained in force for a long duration even after the independence of the country and have been recently repealed by the new criminal codes i.e. Bhartiya Nayay Sanhita, 2023, Bhartiya Nagrik Suraksha Sanhita, 2023 and Bhartiya Sakshya Adhinyam, 2023.

### ❖ INDIAN CRIMINAL PROCEDURE CODE:

Currently, we have Bhartiya Nagrik Suraksha Sanhita, 2023 having 39 chapters and 533 sections. We can understand it through the following points:-

1. Structure and Power of Courts:- It provides the structure as well as power of the courts as chapter-II and III of the Sanhita deals with the constitution of criminal courts and the offices. It provides for the establishment of Courts of Session comprising the Session Judge as well as the Additional Session Judge. These

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<sup>1</sup> [https://www.exoticindiaart.com/article/dharma-life-principles-according-to-----manusmriti/?srsltid=AfmBOorqOEHA5Y7mTL\\_CBbHwgz\\_xZ1N3Bwjy9jTP1AI-p3NWIMs509](https://www.exoticindiaart.com/article/dharma-life-principles-according-to-----manusmriti/?srsltid=AfmBOorqOEHA5Y7mTL_CBbHwgz_xZ1N3Bwjy9jTP1AI-p3NWIMs509) (Code: 6:92 of Manusmriti).

courts have enormous powers and can punish up to the death sentence. But the death sentences shall be subject to the confirmation by the High Court. It also establishes Courts of Judicial Magistrates headed by Chief Judicial Magistrate, Additional Chief Judicial Magistrate and Judicial Magistrate of 1<sup>st</sup> and 2<sup>nd</sup> Class. The officers of these courts are subjected to limited power of sentence such as one year, three year or a sentence of an imprisonment not exceeding seven years. Further there were provisions for the Special Judicial Magistrate, Executive Magistrate and Special Executive Magistrate. So, usually the Sanhita provides for the overall establishments of criminal courts subordinate to the High Court.

2. Provision as to Prosecution:- It provides for the establishment of Directorate of Prosecution in a state as well as District Directorate of Prosecution in a District consisted with Director of Prosecution, Deputy Director of Prosecution, Assistant Director of Prosecution with the power and function of monitoring the cases in their area and to perform such functions as provided by the State Government.
3. Provisions as to Arrest:- It provides the provisions mentioning the procedure of arrest and also provides for cognizable and Non-cognizable offences. The section 35 of the Sanhita is very important as it provides for the circumstances under which a police officer may arrest a person without having any order from the Magistrate and without having a warrant. It provides for the procedure for making an arrest which can be summarized as follows:-
  - A. The police officer must bear an accurate, visible and clear name plate so that he can be easily identified;
  - B. The police officer must prepare the memorandum of arrest which must be attested by one witness and further countersigned by the person arrested;
  - C. The arrested person have a right to meet an advocate of his choice;
  - D. In case of private arrest, the arrested person shall be made over to the police officer within six hours from the arrest;
  - E. The protection of women from the arrest after sunset and before sunrise except only in exceptional circumstances;
  - F. The duty to inform about the arrested person to his friend or relatives;
  - G. The right of the arrested person to be get informed about the grounds of his arrest and also the right to bail in theailable offences;
  - H. The duty to cause medical examination of the arrested person;
  - I. The duty to cause identification of arrested person, when required;

- J. The duty to take reasonable care of the health and safety of the arrested person;
  - K. The duty to produce the arrested person before the Magistrate within 24 hours from his arrest excluding the time necessary for travel;
  - L. Duty to make an arrest strictly according to the provisions mentioned in this Sanhita.
4. Provisions for the issuance certain processes for the appearances:- It provides for the certain processes for compelling the appearances of the person in the court i.e. summons, warrants and in case of person being concealing himself or has been absconded, in such case the process of proclamation and attachment. The Sanhita also provides for the processes for compelling the production of things.
  5. Provisions for peace:- It provides for the provisions regarding the taking for security for maintain the peace and good behavior from certain persons i.e. suspected persons, habitual offenders etc.
  6. Provisions for the maintenance of wives, children and parents:- It provides that if any person beside having sufficient means uses to neglect or refuses to maintain his wife, legitimate or illegitimate child, or if such child has attained majority but due to some reasons unable to maintain itself, father or mother, in such case the Magistrate may order him to make such monthly allowance to them as fixed by Magistrate. This is a very unique provision in the criminal procedure code of India as it looks to be of civil nature but is incorporated in the criminal procedure code.
  7. Provisions as to reporting of offences as well as the investigation made therein:- It also provides provisions as to the reporting of the offences and the registration of the FIR (First Information Report) under section 173 of this Sanhita. Whereas in non- cognizable offences the information must be entered in a book kept by the officer and then the magistrate may order the officer to proceed with the case. The chapter XIII of the Sanhita mentions such provisions including investigation of the offences including the procedure, submission of report, power to hold investigation and preliminary inquiry, examination of witness by the police, recording of statements, recording of confessions i.e. in the presence of Magistrate, making of search, medical examination of the victim in rape cases, time-limit for conducting the investigation as well as the final submission of report under section 193 of the Sanhita which we know as charge sheet, order of inquiry by the Magistrate where the cause of death of a person is in suspicion and many more.

8. Provisions as to commencement of proceedings before the Magistrate:- It provides for the provisions dealing with the proceedings before the Magistrate which includes the issue of process which includes different ways for summon as well as warrant cases, dealing with the petty offences and in case of cases which are fit to be tried only by the Court of Session, in such case to commit the case before the Session Court.
9. Provisions as to charge:- It provides for the preparation of charge and includes the provisions as to the content of charge which provides for the mentioning of the name of the accused, the offences committed by him, the law and section as well as the fact. It shall also include the time, place as well as the person against whom the offence has been committed and also the manner in which the offence is being committed. It also provides for the alteration of charge and the provisions regarding the joining of more accused in the charge.
10. Provision as to trial before the Court of Session:- It provides for the provisions dealing with the procedure for trial before the Session Court:-

Opening of Charge
Discharge
Framing of Charge (Where the accused is not discharged under section 250 of the Sanhita)
Arraignment
Prosecution Evidence
Defence Evidence (Where the accused is not acquitted under section 255 of the Sanhita)
Arguments
Judgement

11. Provisions as to trial before the Magistrate:- It provides the provisions as to the trial before the Magistrate which further provides for the trial of warrant cases and the trial of summon cases. Further there are provisions dealing with the summary trials which are provided so as to save the time of the court and well as to ensure the justice in speedy manner.
12. Provisions as to Plea-Bargaining:- Usually plea bargaining is a process of

negotiation where the accused pleads guilty for a lesser offence in exchange of a lighter punishment that would have been given to him for such an offence<sup>2</sup>. The chapter 23 and sections 289 to 300 of the Sanhita deals with the provisions of plea-bargaining.

13. Provisions as to bail and bonds:- There were various provisions dealing with the bail and the bonds. Usually under this Sanhita there are the following bails:-

<b>BAIL</b>	<b>SECTIONS</b>
Default Bail	187 (2) BNSS
Bail in Bailable Offences	478 BNSS
Bail in Non-Bailable Offences	480 BNSS
Bail to appear before the next Appellate Court	481 BNSS
Anticipatory Bail	482 BNSS
Bail under special powers of the High Court or the Session Court	483 BNSS

14. Provisions as to Appeal, Reference and Revision:- It also provides for the provisions as to the appeal, revision and review. Both the victim as well as the accused may file an appeal if they are aggrieved by the decision of the court, to any superior court. However, as per section 417 of the Sanhita no appeal can be filed by a convicted person in petty cases where the amount of fine is too low and the sentence is for a term not exceeding three months. Further this Sanhita provides for the power of the courts to hear appeal with the matter of appeals. Further there were provisions as to the matter of reference and the revision.

15. Other Provisions:- The Sanhita deals with various other provisions:-

- A. The provisions as to the maintenance of the public order and tranquility which includes dispersal of assembly (unlawful assembly), by use of the civil force, use of armed forces to disperse assembly. Further the provisions as to remove the public nuisance and to settle disputes as to immovable property;
- B. The provisions as to the power of the police officer to prevent the commission of cognizable offence and further to prevent injury to the public property;

<sup>2</sup> <https://cdnbbsr.s3waas.gov.in>.

- C. The provisions as to the inquiries and trials;
- D. The provisions as to deal with the cases where the accused is of unsound mind;
- E. The provisions as to the judgment and its content, language etc. The provisions as to the Victim Compensation Scheme, Witness Protection Scheme, Compensation to the persons who are arrested groundlessly and many more;
- F. The provisions as to dealing with the cases where the death sentence has been passed by the court as well as its confirmation by the High Court;
- G. The provisions as to transfer of criminal cases and the execution, suspension, remission and commutation of offences;
- H. The provisions as to the compounding of the offences;
- I. The provisions as to the irregular proceedings;
- J. The provision as to the inherent power of the High Court i.e. section 530 of the Sanhita.

So, in the end we can see that the criminal procedure code of India is very vast and wide. It deals with almost all the processes for the administration of the criminal justice.

#### ❖ **HISTORY OF CRIMINAL JUSTICE SYSTEM OF USA:-**

The USA criminal system can be traced back from the British legal tradition. It was the colonial period when the USA legal system was introduced by the Britishers. However, the new settlers in the USA create their own rules and regulations for the administration of criminal justice. But with the passage of time the Americans introduced their own much modified legal system.

#### ❖ **USA CRIMINAL PROCEDURE CODE:-**

Currently, they have Federal Rules of Criminal Procedure, 1946 having 9 titles and 61 rules. These rules generally govern the procedure of all criminal proceedings in the US District Courts, US Court of Appeals, US Supreme Court. We can understand it through the following points:-

1. Provisions as to the preliminary proceedings that include the filing of complaint before a state or local judicial officer, issue of warrant or summons which also includes the issue of warrant or summons through telephone or other reliable electronic means, initial appearance, procedure in felony and misdemeanor cases in relation to appearance, procedure as to arrest and appearance as well as the

- preliminary hearing.
2. Provisions as to Grand Jury and the Alternate Jurors, as per rule 6 where the public interest requires, the court may summon one or more grand juries. A grand jury must usually have at least 16 to 23 members. The appointment of foreperson and deputy foreperson. There is also the provision as to the secrecy of the matter considering before the grand jury. The procedure as to indictment, as the accused shall be indicted only when at least 12 jurors concur. In case of failure to concur, then the foreperson must promptly in writing report the magistrate about the lack of concur. The grand jury may serve until the court discharges it, but may serve for more than eighteen months only at the requirement of court. The extension may be granted for not more than six months.
  3. Provisions as to arraignment and preparation for the trial. As similar to BNSS, in US rules also there is provision that whether the accused pleads guilty or claim for trial. This is known as arraignment. If the accused i.e. defendant pleads guilty to either a charged offence or a lesser or related offence, the procedure as to plea agreement will be conducted. Further there are provisions as to pleadings and pretrial motions which include motions that may be made at any time or only before trial.
  4. Provisions as to venue of trial which clearly states that the trial for an offence must be conducted in a district where the offence has been committed by the defendant. However, the trial may be transferred at the request of the defendant to the court which must also be approved by the US attorneys of both the districts.
  5. Provisions as to trial which includes the rules as to jury or nonjury trial, size of the jury (12 persons unless provides otherwise), trial of nonjury cases, examination, procedure in case of judge's disability, procedure as to taking testimony of witnesses, production of the statement of witnesses, ordering of mistrial, appointment of interpreter including an interpreter for the victim, motion for judgement, finality and appeal and it also contains the provisions as to the partial verdict, mistrial and retrial.
  6. Other Provisions:- The Rules deals with various other provisions:-
    - A. The provision as to sentencing and judgement as well as the post-conviction procedures.
    - B. The provision as to right to appeal of the defendant.
    - C. The provision as to probation and revoking, modifying the probation and the

concept of supervised release of the defendant.

- D. The provision as to reducing of the sentence if the defendant, after sentencing, provides substantial assistance in investigating and prosecuting another person.

#### ❖ **COMPARATIVE ANALYSIS:-**

Both USA and India were earlier the colony established by the Britishers but one had been independent from more than two hundred years and one has yet to complete its hundred year of independence. The Bhartiya Nagrik Suraksha Sanhita, 2023 provides for the more vast procedures including the concept of bail, bail bonds, sureties, reference and revision, trial before High Court and especially the section 528 i.e. Saving of inherent powers of High Court. The USA criminal procedure rules are not much wide than the Indian code but we can see that the USA code is much focused jury system which was earlier part of the Indian Judicial system but later on it was abolished by Code of Criminal Procedure, 1973. The abolition is rooted from KM Nanavati Case in 1959 that was also the last case involving jury system. However, in USA there is much wider role of jury as well as grand juries. The pre-trial procedure of USA is much more formalized whereas the pre-trial procedures in India are much more flexible and the formalities started from the opening of case by the public prosecutor. The role of judge is also much more important in India as he plays an active role in the trial but in USA this role is very limited. The Indian code is applicable in the whole territory of India whereas in USA, this code is usually applicable for federal laws and in federal courts not for state laws or state courts.

#### ❖ **CONCLUSION:-**

In the end we can say that both the countries have their own different criminal procedure code suitable to their own conditions. Both procedures have their own benefits as well as drawbacks. The jury system of USA strengthens more exactness of decision and reduces the chances of bias whereas the Indian code is much focused on the dealing of case by more specialized people having knowledge of law. One had the oldest democracy and one had the biggest democracy, both have a very strong judicial institution and a regularized procedure from reporting of an offence to appeal thereof. However, in the end it is the people sitting on chair and acting as an authority to ensure the sanctity of the judicial system.

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