

“Post Mortem Examination under Criminal Justice System: A Legal Perspective”

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I. ABSTRACT

Post mortem examination is a procedure conducted after the death of an individual under suspicious and unusual circumstance pointing towards an unnatural reason of death or involvement of another person in the death of such individual. Such post mortem examination is conducted under the branch of forensic science and always by expert supervision. This examination of dead body is executed to prove the innocence or guilt of another person who may be suspected for the death of the person and hence, is useful in determination of crime under criminal justice system. In this paper, the concept of post mortem examination is understood in detail. The procedure of post mortem examination under a criminal justice system is analysed and the necessary precautions to be maintained in due course has been highlighted. The importance of death scene investigation prior to the post mortem examination has been inferred to smoothen the process of the examination. The aspect of post mortem examination under criminal justice system has been examined and the credibility of the post mortem report has been analysed. The statement given by forensic pathologist in court has been discussed. Further, post mortem examination as a quality improvement instrument has been described in the paper. The legal perspective of the post mortem examination has been considered in the paper. Under the criminal justice system, evidence is essential for determination of guilt of the accused. The paper throws light upon the circumstances in which the post mortem examination report shall be considered as evidence in court. The weightage of the post mortem examination in court proceedings have been determined through this research paper.

Keywords: Post mortem examination, criminal justice system, guilt, death, credibility.

II. INTRODUCTION

“A post mortem examination is carried out on a body after death, in order to determine the cause of the sudden death of such person. Post mortem examination is a Latin phrase, meaning ‘after death’. It is also known as Autopsy which means to ‘look at one’s self’ and sometimes can also be understood as ‘seeing with one’s own eyes’. A post mortem examination provides a lot of information regarding illness, the extent of such illness or cause of death of a person, which may not be available by any other means. An Investigating officer should participate actively by remaining present at the time of the post mortem examination. The post mortem report as a result of the examination has great value. It helps the criminal justice system to decide the corpus delicti, the modus operandi, the sequence of events and collect clues that may link a criminal the acts of the crime or the crime scene. In certain situations, examination of accidental or congenital abnormality can help in the identification

of the deceased person. Also in some cases where visual identification is difficult in mutilated or charred cases, DNA profiling or dental examination is used to confirm the identity of the unknown person.”¹ “There are further more analysis done such as post mortem toxicology, histology, post mortem bio-chemistry, immunohistochemistry, and methods of imaging in modern autopsy work. Such examination is usually done by a pathologist, who has an expertise in the field of diseases and disease tissues and is usually done under two circumstances- i) at the direction of the coroner of a district where the death occurred or any person considered a legal authority like a judge, medical practitioner, a magistrate or a police, known as forensic post mortem examination, where the pathologist is concerned in finding out the cause of death for criminal investigation and the justice delivery mechanism and ii) with the consent of the relatives of the deceased, to learn the extent of the disease, known as hospital post mortem examination. Post mortem examinations are generally conducted within 2-3 days of the death of the deceased. In different countries, different formal organization of forensic study is used.”² To get as accurate results as possible it is important to receive all the details that can be available from the death scene investigation before conducting the post mortem examination to ensure proper outcomes. “The basic procedure of general examination of post mortem examination is an extensive methodology involving taking permission from the legal authorities or consent of the relatives, identification, examination of body parts, internal as well as external, different injuries, neck, hand, etc are all examined by the concerned pathologist.”³ The main task of the forensic science department and the medico legal experts are to connect the dot or provide a link between the post mortem report and the person accused of a crime. Details available from post mortem examination give the courts and justice delivery mechanism a clear picture as to what judgment should be given or who shall be convicted for that crime. Post mortem examination acts as quality improvement tool in the field of justice system by providing information related to the deceased and also may highlight the possible criminals if they get the essential requirements to conduct such research.

RESEARCH QUESTIONS

1. Whether or not the procedure followed for post mortem examination sufficient to determine the cause of death of the deceased?
2. Whether or not the investigation of death scene before post mortem examination and the post mortem examination itself affect the decisions under the criminal justice system?
3. Whether or not post mortem report act as a quality improvement instrument?

¹ Kamil Hakan Dogan & Serafettin Demirci, Introductory Chapter: An Overview of Post-Mortem Examination and Autopsy, POST MORTEM EXAM. AUTOPSY - CURR. ISSUES DEATH LAB. ANAL. (2018).

² MAX M. HOUCK, FORENSIC PATHOLOGY (2016).

³ B.R. Sharma, FORENSIC SCIENCES IN CRIMINAL INVESTIGATIONS AND TRIAL, (6th Edition, Universal, Lexis Nexis, 2020).

RESEARCH OBJECTIVES

- To establish the basic procedure of post mortem examination.
- To highlight the importance of investigation of death scene before post mortem examination.
- To infer the importance of post mortem examination.
- To analyse the effect of post mortem examination on the criminal justice system.
- To interpret post mortem report as a quality improvement instrument.

RESEARCH METHODOLOGY

The research paper is doctrinal in approach. The focus of the paper is on analysing the value and importance of post mortem examination. The paper is also an in-depth research on the effect of post mortem examination on the trial courts. The paper is theoretical and analytical in nature. The paper is doctrinal because through rational and legal reasoning and also with the help of precedents the research has been conducted for a period of two months from April to June. There are no primary sources of data used in the present paper as such. The sources of data in the paper are secondary in nature. These include information from various articles, journals, books, website articles, newspaper articles, etc.

LITERATURE REVIEW

1. Forensic Science in Criminal Investigation and Trials By B.R. Sharma

This book provides with vast knowledge on presenting forensic evidence in the courts. It also highlights the potential, limitations and process of forensic science in great detail. This book has given the present project an understanding on the procedure of post mortem examination, which has been included in my project. The importance of post mortem examination has been described in the book, which has been included in the present article. This book, however, fails to include the importance of post mortem examination in justice system

2. Introductory Chapter: An Overview of Post-Mortem Examination and Autopsy by Kamil Hakan Dogan & Serafettin Demirci

This article is an overview on post mortem examination and value of forensic science. This article gives great details on investigation of death scene before conducting post mortem examination, which has been included in my project. The gap in this paper is that it fails to describe the procedure for post mortem examination which is relevant in the current scenario and has been filled in the present paper.

3. Post-Mortem Examination as a Quality Improvement Instrument by Christian Wittekind & Tanja Gradistanac

This article provides an entire report on post mortem report and its value as a quality improvement tool. This article also provides the potential aspects of post mortem report to be used as an effective tool in the justice system and the role of the pathologists regarding the

same. The only gap is that the paper is narrowly focused on the improvement tool aspect and does not include other details like procedure, importance, kinds, etc, related to post mortem examination.

III. PROCEDURE OF POST MORTEM EXAMINATION

“The central procedure for post mortem examination include (i) post mortem examinations must be conducted inside a mortuary, it is mandatory. (ii) Photographing the dead before, during and after the post mortem examination is essential to keep a record of the physical features, injuries or hurt marks. Picturing the facial features like tattoos, birth marks help in identification of the dead bodies. (iii) The history of the dead before post mortem examination shall be studied. (iv) Examination and interpretation of the scene of occurrence of crime is necessary to appreciate the causes and methods of certain aspects found in the dead body. (v) To protect the trace evidence fingerprints should be recorded after the post mortem examination has taken place. (vi) Further to protect trace evidence, all collected evidence like stains, hair, dust, fibre, paint shall be properly transported to mortuary along with the body. (vii) The death body if has hair, dust, paint, fibre or any other evidence in the hands then it shall be covered with clean paper or plastic. (viii) before any dissection or further examination of the body, the relevant body parts shall always be x-rayed. (ix) the medical-legal expert only has the responsibility to take off the clothes of the deceased and no one else. (x) the clothes also form part of the post mortem examination. (xi) All clues that may have evidentiary value shall be collected from the body of the deceased. (xii) simple terms are expected to be used while explaining technical aspects involving the body in the crime. (xiii) recording of negative evidence can prove to be valuable if inconsistent with the central finding.”⁴

A post mortem examination provides enough evidence through which a crime and a criminal can be connected. It is a detailed procedure involving the following under examination-

GENERAL EXAMINATION

Through the examination any deformities or injuries, moles, birthmarks, tattoos shall be described and Get a fixed age, sex, height, build, race of the dead body. The clothes shall also be detailed showing any evidence like holes, blood stain, dust, etc. the details on clothes and size shall also be recorded. An association shall be created with the proof found on the clothes along with the injuries persistent on the body. All evidence must be preserved and packed dry.

BODY EXAMINATION

A description on the lividity or rigor mortis shall be made found on any body part. Any odd findings on the body parts shall be mentioned. If signs of asphyxia are established it should be recorded. The dental circumstance shall be described. Any disease which may have been a

⁴ Id

cause of death must be elaborated. Defence injuries, if any, must be found. Negative evidence shall be collected since it can be of later use.

HANDLING INJURY

All small and large injuries shall be recorded, whether external or internal. Any firearm injury shall be described in detail along with the entrance, the internal way, or exit. The data collection is given serial numbering. A description on nature of weapon, if GSR present or not, direction of firing, site of occurrence or situation of projectile shall all be maintained.

DOCUMENTATION

The evidence from the body of the dead and the clothes found shall all be collected and recorded in the manner of sketches, photographs, X ray on any bone damages or exhaustive detailing by words.

INTERNAL EXAMINATION

All internal examinations shall be systematically recorded. The departments usually stipulate with forms for this purpose. Internal Examination means examination of each body part, organ, and bones in detail to find out any injury marks or decapitation or the extent of the harm inflicted on the dead body. The body parts internally examined include- head, neck, cardiovascular systems, respiratory systems, urinary tract, reproductive systems, spleen, pancreas, biliary tract or adrenals. The organs are observed to find any abnormality apart from just injuries. If nothing is abnormal then NAD is mentioned.

TOXICOLOGICAL MATERIALS

When cause of death is not properly established then toxicological materials are collected for examination if the cause of death is suspected or seems fake. The material mentioned below are generally collected- clothes, stains, blood- from heart, vein or artery, stomach contents, urine, intestine with material, liver along with gall bladder, kidney, lung for poisons, spleen, vitreous fluid, bile. Sometimes brain, heart, lung, bone, muscles, hair, nails are useful in determining any poisonous substance, DNA, to nature of person if a drug or alcohol addict.

REVIEW OR OPINION

The medico legal expert has the obligation to briefly bring to a close the result and product of the examination along with any deduction. The view is based on the cause, mode and time of death. The duty of the expert can extend up to giving additional information when demanded.

POST MORTEM REPORT

“Post mortem examination is important for the criminal justice system in its entirety and not just the parties. For this an adequate post mortem report is sought for which contains data in a standardized format. The expert can further provide extra information when asked for. The

written PMR shall have better description with less technical words and more illustrations along with photographs for the better understanding of the ordinary man.”⁵

IV. POST MORTEM EXAMINATION AND CRIMINAL JUSTICE SYSTEM

The relevance of post mortem examination in the criminal justice system can be seen in the present scenario where for the purpose of investigation of criminal cases, the parties or prosecution specifically resort to post mortem examination to find out clues relating the accused or any other person to the crime that has been committed using scientific evidences. For understanding the importance of post mortem examination in trial of cases, it is also essential to understand the investigation of death scene before post mortem examination which aid with additional information and make the process of post mortem examination smoother.

DEATH SCENE INVESTIGATION BEFORE POST MORTEM EXAMINATION

Collection of evidence from the crime scene is a step prior to the examination of the body of the deceased. After the death scene has been thoroughly examined only then various tests are conducted in the laboratory. The aim of collection of these evidences is to assist in the task of the justice mechanism and understand the time, cause and method of death. A forensic pathologist upon studying the scene of death can inform the investigating officers about the nature of death whether it is natural or some disease or inflicted injury. The investigation of the scene of occurrence of death answers questions such as when, where, how, by whom and what conditions was the body of the deceased found which can be fruitful for the pathologists. With the help of this investigation the involvement of environmental factors in the death of such person can also be understood in detail. “The observations in the death scene and the further evidence recorded by the way of photographs helps to understand the positioning in which the body was found, and also what could be the possible reasons for the death, whether there are materials showing possibilities of asphyxiation or toxicological attributes.”⁶ The death scene can also provide with any weapon if left by the criminal or fingerprint or some clue that may trace the evidence to the guilty. All of this information is used in the determining the guilt of the accused and hence, useful in the justice mechanism. If the manner in which the deceased was murder if found out through the investigation of the death scene then it reduces the work pressure and may corroborate the findings of the post mortem examination. “The deceased is the most important evidence found in the scene of death. Any blood found along with it shall be collected. The investigation helps in understanding of the condition of the body. Documentation of scene, taking photos, videos, making sketches, interviewing by standers and taking detailed notes are all important aspects under the death scene investigation.”⁷ A systematic death scene investigation requires skills

⁵Id.

⁶ Kamil Hakan Dogan, Supra Note 1.

⁷ Vinod Dhingra & Sarthak Juglan, IMPORTANCE OF MEDICO LEGAL EXPERT AT SCENE OF CRIME RELATED TO DEATH, (Journal of Forensic Sciences and Criminal Investigation, ISSN: 2476-1311).

of interpretations and analysis of evidences. The death scene shall be investigated before the removal of the body from the position it was found exactly in to determine the ingress or outgress, manner, cause or any other related evidences. A medical legal expert must always go for investigation process. “A comprehensive on-screen review helps in determining the manner and cause of death. In certain situations, death scene investigation can be more informational than the post mortem examination itself.”⁸ The criminal justice system is dependent on post mortem examination to a large extent in death cases, as a testimony by a medical officer changes the position of the case.

IMPORTANCE AND AFFECT OF POST MORTEM EXAMINATION IN CRIMINAL JUSTICE SYSTEM

The essential features of any criminal justice system are to provide fair method of trial and ensure justice prevails. “For this reason, it is obligatory to examine the evidences thoroughly to protect the innocent and punish the guilty. In India, due to adversarial system the witnesses are a doubtful source of evidence and show the possibility to be manipulated by the advocates of the parties. Apart from this, use of expensive means in trial of cases gives upper hand to the resourceful. Thus, post mortem examination is an efficient remedy to the complaints regarding collection of evidences. The duty of the medical expert is to be fair, reasonable and take due care.”⁹

On basis of the findings in the report, the police have a responsibility to make satisfactory conclusions under the criminal justice system. It is his mandatory duty to scan each aspect which highlights the reasons of death of the deceased in the post mortem reports.

The effect that a post mortem report creates on the criminal justice system passes through the prosecution and defence. The post mortem report is useful for the prosecutor to present his case by using the reasons of death, if any mentioned therein. The prosecution attempts to provide as clear evidence as possible to the courts for correct judgment. This helps the criminal justice system in facilitating a speedy hearing and trial, where not only the victim but the accused can be set free from the pressure of trial. Since the post mortem examination has to be conducted in a limited time frame for the purpose of more accurate results, it is of much use in the courts and thereby the justice mechanism. “With simple language and illustrations, the post mortem report makes the work of the judge easier. Since post mortem examinations are based on scientific facts, the position of the defence or the prosecution should not be much different. The mere interpretation changes on the manner or cause of death.”¹⁰

⁸ Avis SP, AN UNUSUAL SUICIDE. THE IMPORTANCE OF SCENE INVESTIGATION, (The American Journal of Forensic Medicine and Pathology, 01 Jun 1993, 14(2):148-150 PMID: 8328436).

⁹ Vincent Di Maio, THE VALUE OF MEDICAL EXPERTISE IN DEATH INVESTIGATION: MEDICOLEGAAL DEATH INVESTIGATION AND THE CRIMINAL JUSTICE SYSTEM (last visited Feb 29, 2020), <https://www.nap.edu/read/10792/chapter/8>

¹⁰ Id.

“The post mortem examination can be considered as the best admissible evidence for unnatural deaths, thus it has a great impact on the criminal justice system. Trial is generally conducted by testimony of witness or any other evidence. If a pathologist is called as a witness, he increases the corroborative value to the post mortem report given as evidence; this is deemed to be reliable. In the case of *Hadiuzzaman v the State*¹¹, the court decided a description made by medical officer on oath in court is substantive evidence and the medical certificate is corroborative evidence of such description.”¹²

The discretion of admissible evidence is determined by the judges. In the case of *Slam Pratap v. State*¹³, the court held that post mortem evidence is not allowed as evidence until inspection and is not substantive. If under section 32 of the Indian Evidence Act, the report is consistent with the circumstances then such report is suitable and relevant to the case. If the medical officer dies then the report under sec 32(2) is admissible inside the court. This was also held in the case of *Jagdeo Singh v. State*,¹⁴ where the court further held that the use of the post mortem report is to corroborate the deposition given by the medical expert according to section 157 of IEA. The report can also be used to contradict the statement under section 145 of IEA.

Some cases have different perspective on the admissibility of a post mortem report. As in the case of *Gofur Sheik v. State*¹⁵, the post mortem report cannot be considered substantive evidence unless the medical expert has been analysed in court.

Also, in the case of *Rajeev Kumar v State of Bihar, 2017*, the court held post mortem report is not substantive evidence until the deposition is made by the medical expert who formed the report. On non-accessibility of such expert, the report won't be permissible even under section 32 of IEA until some other medical expert testifies to it in court.

A medical witness is independent witness in court, since facts are established and not merely corroborative evidence to an eyewitness. Since a post mortem report gives details on the range of firearms used, knowledge about the wound or the weapon used in the case, it shall not only be considered as opinion evidence but direct evidence. This was held in the case of *Smt. Majindra Bala Mehra v. Sunil Chandra Roy*¹⁶.

Generally medical evidence is considered to be opinion evidence. If the direct evidence is dependable then medical evidence is inadmissible. But if there is variation between medical evidence and direct evidence, the judges shall consider the medical evidence and based upon facts and circumstances give the decision. Usually the case is discredited as held in case of *Ram Narain v. State of Punjab*¹⁷ and *Amar Singh v. State of Punjab*¹⁸. Medical evidence is

¹¹ Hadiuzzaman V. State, BLD (AD) (1986) 191

¹² Md. Ayub Ali, SIGNIFICANCE OF AUTOPSY REPORT, The Daily Star,(last visited Feb 29, 2020), <https://www.thedailystar.net/significance-of-autopsy-report-27787>

¹³ Slam Pratap V State, 1967 All. W.R. (H.C.)

¹⁴ Jagdeo Singh v. State, 1979 Cri LJ 236

¹⁵ Gofur Sheik V State ,1984 Cr.L.J. 559 (Cal) (DB)

¹⁶ Smt. Majindra Mehra V Sunil Roy ,AIR 1960 SC 706

¹⁷ Ram Narain V. State of Punjab ,AIR 1975 SC 1727

agreeably contradicts the prosecution witness only then post mortem report is considered admissible otherwise the testimony cannot be rejected, this was decided in *Vahula Bhusan v. State of Tamil Nadu*¹⁹, also if the witness is plausible then medical evidence is not conclusive even though it give different aspects in the case as observed in *State of U.P. v. Krishna Gopal*²⁰.

In aspects of legal justice system, post mortem examination is important evidence depending upon the facts and circumstances of each case. It is though not direct evidence; the medical officer witness is admissible and the report is used to prove the consistency of the statement made by the expert. In reality, a lot of troubles are faced in presenting post mortem reports in front of the courts. It is difficult to fit in the evidence into the criminal justice mechanism if the police are not capable of comprehending the language used by medical expertise. Sometimes, the case is such that the judges are not well trained to interpret the report and utilize it effectively. Due to this the pathologists are abided to answer irrelevant questions and waste time of court. “Thus, a well-coordinated investigation and conclusion be the police, lawyers, judges and forensic pathologists will enhance the integrity of post mortem examinations in the justice mechanism.”²¹

V. POST MORTEM EXAMINATION: A QUALITY IMPROVEMENT INSTRUMENT

A post mortem examination by a medical expert is one of the methods to find out why are the deceased dead. For this extensive as well as detailed examinations are conducted to look for the resulting cause and manner of death. In recent times, autopsy is used as a tool for quality assurance of the diagnosis of the dead and to confirm whether previous results were accurate. “Quality assurance through post mortem examination for observing whether the diagnosis or treatment referred is correct or not has been laid as an important purpose of such examination by The American Society for Clinical Pathology. As a tool for quality improvement, autopsy is used in gaining understanding and information about any old diseases which form new patterns. Also, it is used to compare the quality within the pathology departments by audits. The quality improvement tool also tries to figure out the effect of unwanted drugs or techniques that may change the result after thorough evaluation and examination.”²² Autopsy like any other examination cannot be perfectly accurate. Sometimes it is not uniformly presented as well. There is no systematic way of dealing with autopsy reports. Apart from this the families prefer not to choose autopsy as a tool for quality improvement due to financial resources, expert behaviour among other reasons. There are new alternatives to autopsy due to decline in the request for diagnosis through post mortem examination including Virtual autopsy or minimal autopsy by fewer invasions. But they may not give the

¹⁸ Amar Singh v. State of Punjab ,AIR 1987 SC 826

¹⁹ Vahula Bhusan v. State of Tamil Nadu ,(1989) 1 SCJ 255 20

²⁰ State of U.P. v. Krishna Gopal ,AIR 1988 SC 2154

²¹ Supra Note 11.

²² Christian Wittekind & Tanja Gradistanac, Post-Mortem Examination as a Quality Improvement Instrument, 115 DTSCH. ÄRZTEBL. INT. 653–658 (2018).

full diagnosis of the deceased. They can be supplemented and not replaced. Post mortem report in the field of justice system may not be considered direct evidence but has corroborative value to the medical expert witness, thereby, acting as a tool for quality improvement be it in process of examination and cause of death or even in the justice mechanism for larger benefit of the society.

VI. CONCLUSION

A post mortem examination is the examination by a medical expert on the body of a deceased to understand aspects of crime that link to the guilty. The steps involved in the process of medical examination are wide covering all possible aspects that can be found using medical science to catch a culprit. This forensic science including post mortem examination is responsible to trace the cause of death, whether natural or not and helps in informing the family and the justice mechanism including the police, investigating authority, court and medical expert witness of the parties. The death scene investigation is important in field in criminal justice system since it is a step prior to where the details and evidence are found out before sending it to the laboratory where a post mortem examination is conducted. The post mortem report helps the prosecution establish his case by supporting the agreement on how, when and under what possibilities was the person dead. Since the report is based on examination done by observations of the medical officer, it is advisory in nature. In some situations, it can be direct evidence, if rigor mortis is present in corpse or in telling the time of death. Witnesses are considered most reliable evidence, upon oral testimony if satisfactory; medical evidence cannot be admissible. The evidence of medical officer witness is reliable as any other oral witness. Due to lack in people preferring autopsy due to delay in post mortem reports, negligence of medical officers, contamination of evidence, unethical practices by lawyers, the status of post mortem report in India is not conclusive but of corroborative value. Thus, to summarize a post mortem examination has few basic and essential steps that have to be carried out without any scope of unreasonable care to get credible results. The procedure includes a detailed examination of body, clothing, internal and external injuries and a descriptive report by the medical examiner. This report may prove to be essential in the trial proceedings. In terms of importance of post mortem examination to the justice system is huge. The investigation of death scene is the initial stage of gathering evidence. Through various case laws it has been proved, the report is generally acceptable to conform to the statements of the expert witness. Post mortem report can be seen a quality improvement instrument only if methods of conducting the examination are improved and experts are adequately trained. To conclude, post mortem examinations are relevant in the present scenario and cannot be replaced, thus, the process of examination must be upgraded.

VII. RECOMMENDATION

Post mortem examination or autopsy is extremely relevant in searching for medical aspects relating to a crime. But in the present scenario there has been a lot of setback in opting for autopsy reports due to errors made by pathologists or changes made by experts upon bribe or

coercion. For this a systematic and efficient method must be developed which will make the medical insights in a crime more valuable. Even though the post mortem examination process is extensive and provides hand full of knowledge, if the experts aren't able to express and explain the police, investigating authorities or courts, the technical terms and knowledge is of no use. It must be simplified. Negligence shall be avoided by investigating authorities in transferring evidence and carelessness shall not prevail while conducting the examination by the pathologists. For this purpose, legislation shall be made to prevent any kind of discrepancy. When the criminal justice system is concerned, the autopsy report must be considered in cases of differences in opinions of witness and any prevailing inconsistency. Preparing the medical expert witness, on how and what to be said in court which is in accordance with the report and in comprehensible language, makes the work of the judge easy in giving decisions. As a quality improvement tool, post mortem examination must be conducted after training the experts on the medical knowledge on aspects of use of the examination as quality assurance and not merely for finding out some caused and explanations. The information must be as far as accurate.

VIII. REFERENCES

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