Intellections and Arguments of a Show Cause Notice in the Qur'ānic Perspective; Its Utility and Applications for the Modern Criminal Justice System

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Abstract:

Islam is a full code of life which covers the legal and political concerns of both the state and the individual. Islamic politico- legal system ensures the fundamental and natural rights of all citizens. One such speaks for taking no action against a person based on an allegation until his response is heard and/or documented. The Islamic law advocates for a right of an individual to be informed through a show cause notice in face of the situation and to ascertain whether the allegations against him are true or false. This article discusses the show cause notice, its parameters and ingredients in the Islamic perspective. The main purpose is to analyses the compliance and universality of the Islamic law which believes in human rights to be stood erected for the peace and tranquility of human society from International human rights perspective. There are several incidents in the Holy Quran which clarify the procedure of initiation, service and application of a show cause notice in terms of rights of accused. This paper focuses on four stories amongst these Holy verses. All the stories contain a complete procedure of show cause notice. The conclusion drawn is that the contemporary law of Pakistan w.r.t the procedure of Show Cause Notice is in due accordance with the Qur´ānic instructions.

Keywords: ***Show Cause Notice, Human rights, Islamic Law, Legal System***

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Introduction

Islam has a unique place among the world comity of religions. It aims both at the respect of Allah Al Mighty's Rights (Huqūq-al-Allah) and the due regard to the rights of [1]human beings also. [2]

The discussion under hand belongs to a very important species of legal matters. In the modern times where multitude of problems are cropping up; the corresponding solutions have become quite challenging. One among these is the mention of human fundamental rights which speak about not inculpating an [3]accused till heard.

Study of the exemplary life of the Prophet Muhammad (S.A.W) and the Caliphs [4]many examples of justice can be found for setting the beacons of justice. Among which the topmost is the life of Abu Bakar (R.A) when he offered his services for his subjects on the wages of an ordinary labour by taking nothing from the state

Prior to presenting any example, the content of Prophetic attitude (Seerah) can be quoted for the practical implementation of law, where certain important occurrences took place where [5]the Creator of the universe Himself has determined a criminal justice procedure, by dictating the basic precepts of justice for the obedience of creatures. [6]This justice system bounds a creature to follow law in all cases. In light of these perpetual laws and Juristic Views (Ijtihād) it is must to produce the Show Cause Notice before incriminating a person.

This study rotates around the thought of not incriminating an accused till he is given ample opportunity to be heard in person or through a representative for explaining his cause.

Literature Review

This study is focused on selected four incidents from the Holy Quran wherein the whole process of a show cause notice has been extended prior to penalizing the accused. At several places, the Holy Quran appreciated the practical footsteps for[7] implementation of justice. For maintaining [8]the human dignity so lofty some examples are drawn from Quran and Sunnah.

1. In the mishandling of Human Rights Allah Al Mighty does not grant forgiveness till the concerned human who being wronged forgives. [9]
2. False accusations lodged against a person have been strictly forbidden and is declared as a "great sin". [10]
3. In case an accusation is proved baseless the fabricator will be forged on eighty counts.
4. Islam, crime and criminal justice. details the thorough procedure and features of criminal justice relating to an accused and it is actually here that we find illustrations and explanations on the urge for a Show Cause Notice[11]
5. Social justice in Islam. Necessitates the need for marinating the edifice of social and criminal justice in Islam so lofty[12]

Material and Methods

Among the various specified methods of research the study under hand involves both the inductive and descriptive methods of study. The reason being that the Islamic component of the article heavily relies on Quranic verses, therefore the Quranic verses are sorted out and whereby the principles of Show Cause Notice are found these are explained and applied on the study under hand and side by side a particular endeavor is made to make a recourse to the relevant clauses of contemporary Pakistani Laws like CPC, CrPC and Constitution of Pakistan, 1973 and the

conclusions are drawn at the end. The APA Style of citation has been adopted for sources.

For primary data the books, scholarly articles and reports of various legal experts have been relied upon. The data is then subjected to thorough analysis and few conclusions drawn. Actually the Human Rights perspective has been investigated for the end of legal system reform and justice.

The Receipt of a Complaint Express or Implied

When a considerable amount of content may it be oral or written is received form a complainant, or when certain complaint is received against him, then it is subjected to certain legal treatment for further consideration. According to CRPC-1898, the process of compelling appearance or requiring the production of accused before the court is adopted through the lodging of summons immediately after receiving a written complaint against the accused. Article-68 necessitates this legal requirement in the form of issuance of summons to the accused whereby every summon issued by a court under the code shall be in writing, signed and sealed by the presiding officer shall be duly served on the accused.

One such instance could be found in the incident of Prophet Ibrahim (A.S.) who asked Allah Almighty about bringing back the dead to life, then, his question apparently seemed to be garmented in suspicious clothes, upon he was asked for further explanation. As Quran says: "(Remember) when Ibrahim said: "My Lord! Show me how you give life to the dead." Allah Almighty said: "Is it that you don't believe?" He said: "Of course, I do, but it is just to make my heart at peace." Allah Almighty said: "Then take four birds and tame them to your call, then put on every mountain a separate part from them, and then give them a call, and they shall come to you rushing, and know that Allah is Mighty and Wise."[13]

Likewise, when Hazrat Yūsuf (S.A.W) was accused by the wife of the Ruler of Egypt for molesting her, there was a room for a doubtful content; rather these words endorsed the intent of Zulekha or not. Holy Quran narrated the situation so that: "They raced towards the road, and she ripped his shirt from behind, and they found her master by the door. She said: "What would be the punishment of him who intended evil with your wife, expect that he be imprisoned or (given) a chastisement?"[14]

Similarly, when Beelzebub mocked Hazrat Adam (A.S) by refusing to prostrate in front of him then upon this action, a show cause notice was issued to explain the reason of his refusal.[15] By keeping under consideration these incidents, the same event happened to Hazrat Suleiman (A.S) when from his vast army hudhud (hoopoe) was found missing and he was asked to describe the reason of his being missing, and a command was given about him either to come forward with some sound reason or otherwise, face the slaughtering. The Holy Quran says about the words of Hazrat Suleiman (A.S); "I will punish him with a severe punishment or slaughter him unless he comes to me with a clear plea."[16]

The Accurate Registration of Complaint and Elaboration of the Claim

As far as the registration of complaint is concerned, the Criminal Procedure Code of Pakistan lays down its clear parameters. Article 200 of the Code states that [17]"a magistrate shall after the receipt of the complaint immediately examine the complaint and reduce it to writing and it should be signed by the complainant and by the magistrate" (CrPC S.200,1989). This is a well settled principle of law that it is for the claimant to prove his claim. In case, certain ambiguity is found in the content of the claim, then he should be asked for explanation of the ambiguity. Because, when

ambiguity arises in this regard it begets multiple questions which can influence the decision by producing several possibilities about the issue in hand.

The benefit of the accurate registration of a complaint is that during the hearing of the suit, if certain legal short coming is reported, its benefit goes to the accused. May be, because of these reasons Islam has directed the writers to observe justice during their writing. Allah Almighty orders in the Holy Quran: "And let a scribe write it between you with fairness. A scribe should not refuse to write as Allah has educated him."[18]

In the contemporary world, the worth of show cause notice does stand upon the same principles that the claim should be clearly comprehendible and interpretable. The famous legal scholar Ramana Rao pens down about the ingredients of a show that it shall clearly state what was an allegation against the accused person .

It is for this reason, that in the narrative of the hoopoe, two possibilities were forwarded about the missing bird; one was his disappearance and the other was non-visibility despite his presence. Allah Almighty narrates the conversation of Hazrat Suleiman (A.S) in this regard: "And (once) he checked the bird and said, "How is it with me that I do not see the hudhud (hoopoe)? Rather he has disappeared."[19]

Like this, When Beelzebub refused to prostrate before Hazrat Adam (A.S), Allah Almighty having been Knowledgeable about everything, and already knew about the cause of this refusal but still initiated a show cause notice to explain his stance on this disobedience. The above quoted incidents absolutely necessitate the requirements of explaining the claim of the claimant.

Initiation of Show Cause Notice by Competent Authority in Contemporary Law

In case the complaint after having been received has enough weight and/or critical impact; then proceedings are started by the court. Section-204 of CRPC speaks for the same by stating that if in the opinion of a court taking there is enough ground for initiating proceedings, then the litigation commence before the court of law. The magistrate is authorized to issue a summon and require the personal attendance of the accused and/or permits him to appear by his pleader. When the process of receipt and registration is completed then [20]the competent authority issues a show cause notice to the accused whereby he is made acquainted with the complainant's complaint. So that, in case of the accuracy of the complainant's complaint the grievance of the complainant is redressed. In case of insufficient evidence the accused should be acquitted by issuing a [21]warning to the claimant. Regarding the show cause notice, it would also become evident that in case of his failure, the accused would be given the prescribed punishment.

The contemporary legal experts also hold the opinion that: [22]The Show Cause Notice shall clearly state the level of allegation against the accused, evidence on record to substantiate such allegation, and propose action to be taken against him. Allah Almighty Himself has prescribed a way for the peaceful settlement of inquiry among the human living. When Beelzebub refused to obey the order of Allah Almighty, he was issued a show cause notice to explain the reason of his refusal to prostrate before Hazrat Adam (A.S). Whether, for a certain reason he refused to do so or without any reason and/or because of his pride to commit disobedience. Allah Almighty says; "He said, "I am better creature than him (human being). You created me from fire and created him from the clay."[23]

Likewise, when Hazrat Yusuf (A.S) was falsely accused for molesting Zulekha and she prescribed the punishment also, that to send him behind the bars. When Hazrat Yusuf (A.S) spent imprisonment due to this erroneous decision and the authorities

went to release him from the imprisonment. Then Hazrat Yusuf (A.S) lodged a complaint in the court of the ruler of Egypt to probe an inquiry in the matter. That was the reason that the ladies of Egypt chopped up their fingers, so that the blame may be leaked. Therefore, the ruler of Egypt issued a show cause notice whereby the investigation of the matter was put to inquiry. Therefore, Allah Almighty says: "He (the king) said, "What were your case, O women, when you seduced Yusuf (A.S)?"[24] Further, the orders of Hazrat Suleiman (A.S) about the ḥudhūd (hoopoe) for explaining the reasons of his absence that he will be either sternly punished by slaughtering or he would have to come up with a sound reason suggests a good illustration here. As Allah Almighty says: He said: "I will punish him with a severe punishment or slaughter him unless he comes to me with a clear plea."[25] The abovementioned Qurānic verses authenticate that the Holy Quran duly prescribed all the conditions of meeting the end of natural justice so that, no one is treated unjustly. Everyone may get his due share and nobody's rights should be violated.

Providing due time to the Complainant for Explaining his Cause

The established Criminal Justice System of Pakistan has a room for providing ample time to the accused for explaining his viewpoint. The Code also provides a reasonable time to the accused for production of his explanatory statement or any other relevant explanation in the case concerned. The Code has also ample provision which obligates a court, an Investigation Officer, the Officer-in-Charge of a police station to ask for an explanatory statement before starting any type of legal proceedings. The court can also require him to attend the court or produce relevant and supportive explanation within the given time which will be sound enough for furnishing such reply according to nature of the situation.

The nature of matters keeps varying in different situations. For this reason, by analyzing the Sharia it becomes evident that every accused against whom a complaint has been lodged has a full right to be heard. Allah Almighty has given an opportunity even to Beelzebub for explaining his standpoint, and he was heard. Looking to the nature of the matter an ample and sound time should be given to the accused which is appropriate for explaining his cause. Hazrat Yusuf (A.S) through a bailiff submitted an application to the ruler of Egypt to lodge an inquiry against the ladies of Egypt for explaining the reason for chopping their finger which makes it clear that for resolving the matter and consideration the bailiff first went to the ruler and then to the ladies, who were asked for providing explanation. Allah Almighty narrates the ruler's words so: He (the king) said, "What were your case, O women, when you seduced Yusuf (S.A.W)?" They said, "Allah forbid, we know of no evil in him." The governor's wife said, "Now the truth has come to light, I did seduce him, and he is surely truthful."[26]

The Qurānic Surah Ḥujurāt says that "whenever a steeled news is brought to you by a hypocrite/committer, put it to a due authentication process". Allah Almighty orders his worshipers to: "O you who believe (in Allah), if a sinful person brings you a report, verify its correctness, lest you should punish and/or boycott people out of ignorance, and then become remorseful on what you did."[27]

This holy verse also proves the fact that every matter should be investigated, so that no one should be given harm negligently, and for which a man repents latter. The contemporary law also favours the practice of providing the proper time to the accused for explaining his cause. As Ramana Rao says: He shall be afforded enough time to reply.

An Analysis of the Submitted Response by the Accused

Once the trail is initiated under 265-A to 265-N, the prosecution shall be conducted by public prosecutor with the relevant and supporting documents that were earlier furnished are analyzed and heavily relied upon for the case under consideration by both the parties. [28]Whenever the accused would be brought before the competent authorities, then the competent authority is bound to provide full opportunity to the accused without any force and coercion and without any mental torment. He should be given a free hand to pen down his viewpoint where he will not be facing any bound. The competent authorities will analyze all the facts/arguments impartially and thoroughly. And where the need arises for a witness the complainant should be given an opportunity to present a witness which would be appropriate for the production for his witness. The authorities will analyses the statements of the parties, all the presented facts and arguments and all the relevant witnesses along with the presentation of proofs, where there will be no room for any legal short coming or the embezzlement of content. When the whole procedure is concluded the competent authority will announce the judgment accordingly.

Several places in the Holy Quran prescribe practical illustrations. When Allah Almighty was requested by Hazrat Ibrahim (A.S) about raising the dead then he forwarded the explanation that I have a firm faith about it, but it is the observation that gives firm satisfaction to a man so that, I may be given the exalted privilege through observing it with a naked eye. Allah Almighty asked and Ibrahim (A.S) replied so: "Is it that you don't have belief?" He said: "Of course, I do, but it is just to make my heart at peace and content."[29]

The second illustration about this argument is the refusal of Beelzebub for prostrating before Allah Almighty and to explain a reason in this regard, when he was inquired about this refusal. Despite the superiority of the command he forwarded the nonsensical grounds of self-admiration, pride, the inferiority of Hazrat Adam (A.S), the self-made superiority of his fiery make and inferiority of the earthly nature of Hazrat Adam (A.S) the reason though, unable to rescue in the court of Omnipotent Being.

The third in this series was the plea of Hazrat Yusuf (A.S), whereby the ladies of Egypt were inquired on the reason of having been their fingers chopped. When the Ruler of Egypt inquired them about this, they fulfilled the merits of truthfulness and honesty confessed their sin and explained the modesty of Hazrat Yusuf (A.S).[30]

Another example in this regard relates to Hazrat Suleiman[31] (A.S) in the story of hudhud (hoopoe) calling explanation. Whereby, hudhud (hoopoe) was asked for the reason of his being missing from the regiments. Hudhud (hoopoe) narrated that he was away out in a kingdom where the people worship the sun. Whose command and control are in the hands of a woman? Upon this explanation of hudhud (hoopoe) the judgment was not pronounced at once, but the matter was put to an inquiry for authenticating it. Hazrat Suleiman (A.S) said; "We shall believe whatever you have told the truth or you are one of the lairs. Go with this letter of mine, and deliver it down to them, then turn back from them, and see how they react."[32]

Ramana Rao speaks in this regards that: The authority empowered to act against such person, shall conduct a preliminary inquiry and satisfy itself that reasonable case exists against such person. This may be followed up by full-fledged inquiry if needed. If such Inquiry (either preliminary or final) apportioned blame on the person complained of misconduct or any other act or omission, and competent authority

decides to take action then a show cause notice should be served on the person giving him an opportunity to say his side of the story.

To equate the facts for Conviction of Accused

After the trial has been concluded considering all the relevant information and evidences, the court finds the accused either guilty or not, where it records an order of acquittal under 265-H of the CRPC-1898. When the matter is thoroughly analyzed by the competent authorities then two expected findings come to the ground. Either the accused is convicted owing to the credibility of witnesses or confession of accused or he will be acquitted, otherwise. In case of acquittal the complainant is warned to observe care and caution before making any claim.

The incidents narrated in the Holy Quran also indorsed the same facts that in case of judgments the accused has been release or acquitted sometimes. In case of the first incident of asking explanation when Hazrat Ibrahim (A.S) explained the reason of his question being asked from Allah Almighty that it is in fact for the gratification of the heart that he intends to achieve rather than questioning the powers of the creator. His explanation was not only accepted but he was also shown the process on repudiation practically.[33]

[34]In the second incident when the ladies of Egypt were asked for the reason of amputating their fingers, they truthfully admitted the exact reason by saying they didn't notice any demeaning in the nature for Hazrat Yusuf (A.S) rather he is modest. After having been acquitted Hazrat Yusuf (A.S) was given the important change of looking the government exchequer. Allah Almighty narrates the incidents that; "The king ordered, "Bring him to me, and I shall employ him purely for myself." So, when he (the king) talked to him, he said (to Yusuf), "today you are with us well-placed, fully trusted." He (Yusuf) said; Appoint me to (supervise) the treasures of the land, I am indeed a knowledgeable keeper."[35]

While in the third incident Beelzebub exhibited a large degree of arrogance and made recourse to such baseless and nonsensical grounds that were useless to establish his claim. Therefore, he was convicted and penalized. The Holy Quran says; "He (Allah) said, "then, the truth is-and it is (always) the truth that I speak that I will definitely fill the Jahannam with you and with those who will follow you from among them, all together."[36]

In the last incidents when[37] the narrative of the hudhud (hoopoe) was scrutinized, the Queen of Saba was dispatched a letter, what she replied decently. Then the hudhud (hoopoe's) narrative was authenticated that he is truthful, and the reason of his absence is also sound. After analyzing the situation, he was acquitted.[38]

Warning to the Complainant in Case of Acquittal of Accused

If in any case instituted upon complaint or upon information given to a police officer or to a magistrate the person upon whom (accused) complaint is made is acquitted then the complainant is directed under Article 250 relating to false, frivolous or vexatious accusation the complainant is directed to appear and show cause of the false accusation. It necessitates the fact that in case the accused is convicted he will be given the prescribed punishment and in case he is acquitted from the crime then looking to the nature of the case the applicant will be warned to avoid such actions in future.

In Quranic narrations such an example can be found in the incident of Zulekha when she blamed Hazrat Yusuf (A.S) for mala fide intentions. Then the ruler of Egypt warned his wife on such false accusations on Hazrat Yusuf (A.S) and ordered her to

apologise to him. Therefore, the Holy Quran says: "O Yusuf, ignore this matter, and you (O women), seek forgiveness for your sin, for you were guilty in fact."[39]

Conclusion

The law prescribed by Islamic Sharia for the furtherance of fundamental rights and welfare state stands unique for its perfection which has enough room for prevention of risks to human rights. This law is not only available in the Book but also available for practical applications as we have gone through in the abovementioned Qurā´nic incidents.

According to the [40]fundamental human rights no complaint against a person can be declared final and conclusive until and unless the due legal procedure is adopted and his viewpoint is heard. For hearing the point of the concerned person, a show cause notice is initiated by the competent authorities. This procedure is materialized in various provisions of contemporary criminal law.

Bibliography:

1. Abdelkader, D. (2000). *Social justice in Islam* (Vol. 8). IIIT.
2. Al-Quran
3. Bassiouni, M. C. (1992). Human rights in the context of criminal justice: identifying international procedural protections and equivalent protections in national constitutions. *Duke J. Comp. & Int'l L*
4. Beitz, C. R. (2011). *The idea of human rights*. Oxford University Press.
5. Berween, M. (2002). The fundamental human rights: an islamic perspective. *The International Journal of Human Rights*
6. Cook, J. G. (1976). *Constitutional Rights of the Accused: Post-Trial Rights* (Vol. 3). Lawyers Co-operative Publishing Company.
7. Daud, A. (1981). *Sunan Abu Daud*. Vol 03.Pp.115 .Hadith no,2884 Dar Ul-Kutub Al-Ilmiyyat
8. Donnelly, J. (1982). Human rights and human dignity: An analytic critique of non-Western conceptions of human rights. *American Political Science Review*
9. Esposito, J. L. (1998). *Islam: The straight path* (Vol. 4). New York: Oxford University Press.
10. Mandaville, P. (2010). *Global political islam*. Routledge.
11. Mayer, A. E. (2018). *Islam and human rights: Tradition and politics*. Routledge.
12. Naughton, M., & Tan, G. (2010). *Claims of Innocence*. University of Bristol, Bristol.
13. Nieuwenhuis, A. J. (2012). State and religion, a multidimensional relationship: Some comparative law remarks. *International Journal of Constitutional Law*
14. Qayum, S., Farid, S., Shehzad, S., & Zhu, W. (2016). Short Comings of Criminal Justice System of Pakistan and its Effects on the Rights of Accused Prisoner Wrongfully Convicted or Imprisoned. *Journal of legal studies*, *18*(32), 13-27
15. Qutb, S. (2015). *Social justice in Islam*. BookBaby.
16. Rahman, M. J. The Journey of the Story 'Yousuf Zulaikha': A Cultural Discourse.
17. Rosen, L. (2000). *The justice of Islam: Comparative perspectives on Islamic law and society*. OUP Oxford.
18. Rothblatt, H. B. (1963). The Arrest: Probable Cause and Search Without a Search Warrant. *Miss.*
19. Schachter, O. (1983). Human dignity as a normative concept. *American Journal of International Law*

20. Sluiter, G. (2002). International criminal proceedings and the protection of human rights. *New Eng. L. Rev*
21. Spalek, B. (Ed.). (2013). *Islam, crime and criminal justice*. Routledge.
22. Stavros, S. (1993). *The guarantees for accused persons under Article 6 of the European Convention on Human Rights: an analysis of the application of the convention and a comparison with other instruments* (Vol. 24). Martinus Nijhoff Publishers.
23. Stetkevych, S. P. (2017). Solomon and Mythic Kingship in the Arab-Islamic Tradition: Qaṣīdah, Qurʾān and Qiṣaṣ al-anbiyāʾ. *Journal of Arabic Literature*
24. Subrin, S. N., & Dykstra, A. R. (1974). Notice and the right to be heard: the significance of old friends. *Harv. CR-CLL*
25. Supriadi, U., & Rahmat, M. (2019). Building the Character of Humility through the Prophet Sulayman Model in Kindergarten. In *Social and Humaniora Research Symposium (SoRes 2018)*. Atlantis Press
26. Trechsel, S. (2005). *Human rights in criminal proceedings*.
27. Zappalà, S. (2003). *Human rights in international criminal proceedings*
28. Zappalà, S. (2010). The Rights of Victims v. the Rights of the Accused. *Journal of International Criminal Justice*

References

[1] Zappal[azza wa jalla], S. (2003). Human rights in international criminal proceedings.

[2] Rosen, L. (2000). The justice of Islam: Comparative perspectives on Islamic law and society. OUP Oxford.

[3] Zappal[azza wa jalla], S. (2010). The Rights of Victims v. the Rights of the Accused. Journal of International Criminal Justice, 8(1), 137-164.

[4] Abdelkader, D. (2000). Social justice in Islam (Vol. 8). IIIT.

[5] Spalek, B. (Ed.). (2013). Islam, crime and criminal justice. Routledge.

[6] Beitz, C. R. (2011). The idea of human rights. Oxford University Press.

[7] Qutb, S. (2015). Social justice in Islam. BookBaby.

[8] Donnelly, J. (1982). Human rights and human dignity: An analytic critique of non-Western conceptions of human rights. American Political Science Review, 76(2), 303-316.

[9] Daud, A. (1981). Sunan Abu Daud. Vol 03.Pp.115 .Hadith no,2884 Dar Ul-Kutub Al-Ilmiyyat

[10] Spalek, B. (Ed.). (2013). Islam, crime and criminal justice. Routledge.

[11] Spalek, B. (Ed.). (2013). Islam, crime and criminal justice. Routledge

[12] Beitz, C. R. (2011). The idea of human rights. Oxford University Press.

[13] Al Quran: Sorah Al Baqarah: 02. Verse: 260

[14] Al Quran: Sorah Yusuf: 12. Verse: 25

[15] Al Quran: Sorah Yusuf: 12. Verse: 25

[16] Al Quran: Sorah Namal: 27. Verse: 21

[17] Section 200 provides that the Magistrate will examine the complainant on oath and at that stage, the Magistrate makes up his mind after reading the complaint and going through the statement of the complainant which is reduced into writing, whether he should issue process or not.

[18] Al Quran: Sorah Al Baqarah: 02. Verse: 282

[19] Al Quran: Sorah Namal: 27. Verse: 20

[20] Rothblatt, H. B. (1963). The Arrest: Probable Cause and Search Without a Search Warrant. Miss. LJ, 35, 252.

[21] Subrin, S. N., & Dykstra, A. R. (1974). Notice and the right to be heard: the significance of old friends. Harv. CR-CLL Rev., 9, 451.

[22] Naughton, M., & Tan, G. (2010). Claims of Innocence. University of Bristol, Bristol.

[23] Al Quran: Sorah Saad: 38. Verse:76

[24] Al Quran: Sorah Yusuf: 12. Verse: 51

[25] Al Quran: Sorah Namal: 27. Verse: 21

[26] Al Quran: Sorah Yusuf: 12. Verse: 51

[27] Al Quran: Sorah Al Hujuraat: 39. Verse: 06

[28] Trechsel, S. (2005). Human rights in criminal proceedings.

[29] Al Quran: Sorah Al Baqarah: 02. Verse: 260

[30] Al Quran: Sorah Yusuf: 12. Verse: 51

[31] Stetkevych, S. P. (2017). Solomon and Mythic Kingship in the Arab-Islamic Tradition: Qaṣīdah, Qurʾān and Qiṣaṣ al-anbiyāʾ. Journal of Arabic Literature, 48(1), 1-37.

[32] Al Quran: Sorah Namal: 27. Verse: 27, 28. See in detail from verse. 20-44 of the same Surah.

[33] Al Quran: Sorah Al Baqarah: 02. Verse: 260

[34] Rahman, M. J. The Journey of the Story 'Yousuf Zulaikha': A Cultural Discourse.

[35] Al Quran: Sorah Yusuf: 12. Verse: 54, 55

[36] Al Quran: Sorah Saad: 38. Verse: 84, 85

[37] Supriadi, U., & Rahmat, M. (2019). Building the Character of Humility Through the Prophet Sulayman Model in Kindergarten. In Social and Humaniora Research Symposium (SoRes 2018). Atlantis Press.

[38] Al Quran: Sorah Namal: 27. Verse: 35

[39] Al Quran: Sorah Baqarah: 12. Verse: 29

[40] Schachter, O. (1983). Human dignity as a normative concept. American Journal of International Law, 77(4), 848-854.