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Plea Bargaining Pleaded for Justice

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ABSTRACT

Plea bargaining is a process where the accused and the prosecutor in a criminal case negotiate and agree on a plea agreement, which involves the accused pleading guilty to a lesser charge or accepting a lesser sentence in exchange for a reduced charge or sentence. The use of plea bargaining has become widespread in the criminal justice system, with the majority of criminal cases being resolved through this method.

The aim of plea bargaining is to expedite the resolution of criminal cases, reduce the workload of the courts, and ensure that justice is served fairly and efficiently. However, there are concerns about the fairness of the plea bargaining system, as it can lead to coerced confessions, false guilty pleas, and unequal treatment of defendants based on their socioeconomic status, race, or ethnicity.

Despite its flaws, plea bargaining remains a crucial aspect of the criminal justice system, as it allows for the efficient resolution of cases and reduces the burden on the courts. However, efforts must be made to ensure that the process is fair and just, and that defendants are not pressured into accepting plea agreements that are not in their best interests.

In conclusion, plea bargaining is a critical component of the criminal justice system, and its benefits cannot be ignored. However, it is essential that the system is reformed to ensure that it is fair and just for all defendants, and that it serves the interests of justice. With appropriate reforms, plea bargaining can continue to be a valuable tool in the administration of justice while ensuring the protection of the rights of the accused.

Keyword: *plea bargaining, criminal justice system, plea agreement, guilty plea, sentence, fairness, efficiency, coerced confessions, false guilty pleas.*

I. INTRODUCTION

There is a very famous quote by one of the most excellent lawyer in India Nani Palkhivala (late) that "….the law may or may not be an ass, but in India it is certainly a snail and our cases proceed at a pace which would be regarded as unduly slow in a community of snails". Justice should not only to be done but undoubtedly it should be seen to be done and it is ensured by speedy justice or timely judgment. Right to speedy trial has been guaranteed by Indian Constitution as a fundamental right under article 21 but it remains only in paper as in practical Indian Judiciary is very slow in delivering justice. In India the situation is not good with regard

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to criminal justice system. According to the statistics relating to crime 2016 released by National Crime Record Bureau[2] , cases in which Trials has been completed were 12.74 lakhs in which only 5.96 lakh cases ended in conviction while 6.78 lakhs cases ended in discharge or acquittal. Conviction rate is even below 50%. There are more than 3.4 crore cases pending in India's courts and according to the Ministry, the Apex court had 62,537 pending cases at the end of 2016 while in High court, pending cases went up to 48.15 lakhs at the end of 2020 which was less than the pendency in 2019 but the situation in subordinate courts, which is considered as the backbone of the country's justice system, has become worst as the pending cases went up to 2.9 crore at the end of 2021[3]. This problem of backlog of cases has been recognized by legislature and it introduced the concept of "Plea Bargaining" by way of Criminal Law (Amendment) Act, 2005 to solve the problem of backlogging of case and lower rate of convictions in Indian Court.

As the term suggests, plea bargaining means an agreement between defendant and plaintiff to reach to a resolution about a case without ever taking to trial. It means an offender confesses his guilt in exchange of lighter punishment that would have been given to him for such offence. Black's Law Dictionary[4] define the term "Plea Bargaining" as:

"The process whereby the accused and the prosecutor in criminal case work out a mutually satisfactory disposition of the case subject to the Court approval. It usually involves the accused pleading guilty to a lesser offence or to only one or some of the courts of a multi-count indictment in return for a lighter than that possible for the graver charge."

There are three types of plea bargaining i.e.

1. Charge Bargaining: It means an agreement to plead guilty to one of several charge or less serious charge by defendant in exchange of dismissal of other or higher charge. For example, a man is charged for murder and grievous hurt, a prosecutor may accept a 'guilty' plea for grievous hurt with court's approval in return to dismiss a charge for murder.

2. Sentence Bargaining: It means an agreement to plead guilty by defendant to a stated charge in return for lesser punishment.

3. Fact Bargaining: In this type of bargaining, defendant admits certain facts in exchange for an agreement not to introduce any other facts as evidence.

[2] National Crime Records Bureau, Crime in India 2016, Ministry of Home Affairs, http://ncrb.gov.in/StatPublications/CII/CII2016/pdfs/NEWPDFs/Crime%20in%20India%20- %202016%20Complete%20PDF%20291117..
[3] PTI, "Pending cases go down in Supreme Court, High Courts; but see upward swing in lower courts", The Indian Express, 1 October 2020
[4] Plea Bargaining, Black's Law Dictionary, 8th edition, 1190 (2004

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II. ORIGIN OF THE CONCEPT OF PLEA BARGAINING

Plea Bargaining in US The concept of plea bargaining is evolved in United States and has become a prominent feature of American criminal justice system throughout the years. There are many examples which show that this concept took place in historical time also, one of the example is during the period 1431 when St. John of Arc confessed in order to avoid burning at the stake. But modern concept of plea bargaining is different from historical form. Plea bargaining was adopted with the result of classic case of Martin Luther King Jr[5] . In 1969 James Earl Ray was accused with murder of Martin Luther King Jr. He pleaded guilty in order to avoid death penalty. After his plea he got 99 years of punishment[6]. He later retracted his confession and tried unsuccessfully to gain a new trial. In the US criminal justice system, the accused has three options in regards of plea:

a) to hold guilty

b) to hold himself not guilty

c) nolo contendere, i.e. I do not wish to contend.

In Brady v. United States[7] , the constitutional validity of plea bargaining was challenged and the Supreme Court upheld its constitutionality by saying that a plea of guilty is not invalid merely because entered to avoid the possibility of a death penalty. The Supreme Court also hold that award of lesser punishment in pursuant to plea bargain is not invalid. After a year in Santobello v New York[8] , the US Supreme Court held that plea-bargaining was necessary for the operation of justice and was to be encouraged when properly managed.

(A) Plea Bargaining In India in India

The concept of plea bargaining can be traced since Vedic times as in Dharamsastras, there is a chapter called Prayaschitta which means corrective measures for atmashanti or self-purification by confession his guilt. In Post Vedic period, plea bargaining was prevelant in Mauryan period where it was practiced in the form of conciliation and in Mughal period also it was in the form Quisas system where an accused has to give money to deceased victim's next kin in case of homicide. Later in post-independence, the concept of plea bargaining was formally introduced on the recommendations of Law Commission's reports by way of The Criminal Law

[5] William Bradford Huie, "He Slew the Dreamer: My Search for the Truth About James Earl Ray and the Murder of Martin Luther King, Jr (Revised ed.)", 1997.
[6] Ray pleads guilty to King assassination, March 10 available at https://www.history.com/this-day-in-history/ray-pleads-guilty-to-kingassassination
[7] Brady v. United States, 397 U.S. 742 (1970)
[8] Santobello v. New York, 404 U.S. 257 (1971)

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(Amendment) Act, 2005.

Law Commission's Observation on Plea Bargaining The Law Commission of India supported the concept of plea bargaining in the 142nd, 154th and 177th reports. The 142nd report of the Law Commission of India proposed the introduction of the concept of "concessional treatment for those who choose to plead guilty without any bargaining"[9] under the authority of law with the objective of some remedial legislative measures to reduce delays in the disposal of criminal trials and appeals and also to alleviate the suffering of under-trial prisoners in jails awaiting the commencement of trial were called for. This report dealt with various issues regarding the concept of plea bargaining. It also examined the concept of plea bargaining exercised in the US and Canada. The report also took into consideration the objections to the introduction of the concept of plea bargaining in Indian Legal System to all offences[10]. "Five reasons are advanced to support this concept:

- Most people are arrested, they say they are guilty any way so why bother with a trial?
- Why should we waste public money.
- "Plea Bargaining" is a compromise, both sides give a little and gain a little.
- Trial consumes time and cost.
- It is best for both sides to avail it since on the one hand there is always a chance that even if the defendant is guilty and the evidence is adequate there is a chance to slip up. On the other hand the defendant saves time and money and earn a concession in the form of a less serious offence or sentence."[11]

Basically two questions arise for consideration in this report. The first question is whether the concept of plea bargaining deserves to be introduced in the Indian Criminal Jurisprudence? The second question, if the answer to the first question is in positive, is whether the scheme should be applied to all categories of offence without any discrimination or only to specified offence?[12] Majority of judicial officers expressed their views in favour of introduction of plea bargaining and out of which majority of judicial officers were against the introduction of this concept to all categories of offence but it can be applied to less serious offence. "Some objections raised to the introduction of the concept of plea bargaining in Indian criminal jurisprudence in the report

[9] 142nd Law Commission of India Report, "Concessional Treatment for Offenders who on their own initiatve choose to plead guilty without any Bargaining", 1991
[10] Ibid, at Chapter VII.
[11] Ibid at Chapter III
[12] Ibid at chapter IV

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are:

- The country's social conditions do not justify the introduction of the concept.
- Pressures from prosecuting agencies may result in convictions of the innocents.
- Plea Bargaining may increase the incidence of crim.
- Criminals may slip through impunity.
- The poor will be the ultimate victims of the concept.
- Counsel representing the accused would be unwilling to advise confession invoking scheme because due to such advice the defendant loses faith in the counsel representing him and will engage another counsel." [13]

The report proposed a "scheme to overcome the objections and apprehensions and it is basically different from the plea bargaining schemes prevailing elsewhere in five important areas, namely:

- There will be no contact between the public prosecutor and the accused for the purpose of invoking the scheme. The initiative will be solely with the accused who alone can make the application.
- The decision to accord concessional treatment will rest solely with a judicial officer functioning as a Plea Judge.
- There will be no bargaining with the judicial officers and an application once made will not be allowed to be withdrawn and the accused will not know what the judicial officers will do. He will only make a representation and plead for such concessional treatment as, according to him would be appropriate
- The sole arbiter will be the judicial officer and, therefore, there will be no risk of underhand dealings or for coercion or improper inducement by the prosecution.
- The aggrieved party and the public prosecutor will have a right to be heard and place their points of view."[14]

The Law Commission recommended that the scheme may be made applicable to offences liable to be punished with imprisonment of 7 years and more after properly evaluating and accessing the results of the application of the scheme to offences liable to be punished with the imprisonment for less than 7 years. The scheme may be mad inapplicable to socio-economic

[13] ibid at Chapter VII.
[14] ibid at Chapter X

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offence and to offence against women and children.

The Law Commission of India in its 154th report also recommended the concept of plea bargaining in the Indian criminal justice system. The report also said that the justification of the introduction of the concept of Plea Bargaining cannot be expressed any better than 142nd report of the Law Commission of India. It is of the view that the court, after hearing the public prosecutor and the accused, may accept the application of plea bargaining and pass an order of sentence to the tune of one-half of minimum sentence provided.16 It also recommended that a separate chapter XXIA on Plea Bargaining be incorporated in the Code of Criminal Procedure.[15] Subsequently the Law Commission of India in its 177th report suggested that the recommendations of the 14th Law Commission contained in their 154th report on Criminal Procedure Code, Chapter 13, relating to concept of plea bargaining should be implemented at an early date. The report suggested to include any provisions of plea bargaining as per recommendations of 142nd and 154th report and other judicial decisions of the Supreme Court.

(B) Judicial Observations concerning "Plea Bargaining"

The concept of plea bargaining was examined by the Hon'ble Supreme Court for the first time in Murlidhar Meghraj Loya v. State of Maharashtra[16].In this case the Court held that the idea of plea bargaining is immoral or at best a necessary evil. The State can never compromise with the accused. It must enforce the law. Therefore open methods of compromise are impossible. So it should not be introduced in the Indian criminal justice system. A conviction based on the plea of guilty entered by the accused as a result of plea-bargaining cannot be sustained. Such a procedure would be clearly unfair, unreasonable and unjust and would be violative of Article 21 of the Constitution.[17] In Kachhia Patel Shantilal Koderlal v. State of Gujarat and another[18] , the Hon'ble Supreme Court again disapproved the concept of plea bargaining and held it unconstitutional.

In Thippaswamy v. State of Karnataka[19], the Hon'ble Supreme Court held that to induce or lead an accused to plead guilty under a promise or assurance that he would be let off lightly is violation of Article 21 of Indian Constitution. A conviction of an accused on the basis of plea bargaining is contrary to public policy and it is not permissible to dispose of the case on the basis of plea bargaining. It is further observed that by plea bargaining, court cannot dispose of criminal cases and the court has to decide it on merits. Mere admission or acceptance of the

[15] 154th Law Commission of India Report, "The Code of Criminal Procedure", 1973
[16] Murlidhar Meghraj Loya v. State of Maharashtra, (1976) 3 SCC 684
[17] Kasam Bhai Abdul Rehman Bhai Sheikh v. State of Gujarat, (1980) 3 SCC 120
[18] Kachhia Patel Shantilal Koderlal v. State of Gujarat and another, (1980) Cr.L.J 553
[19] Thippaswamy v. State of Karnataka, (1983) 1 SCC 194

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guilt must not be a ground for reduction of sentence. [20] In Kirpal Singh v. State of Haryana, the Hon'ble Supreme Court held that neither the Trial Court nor the High Court has the jurisdiction to bypass on the basis of a plea-bargain the minimum sentence prescribed by law.[21]

But in State of Gujarat v. Natwar Harchanji Thakor[22] , the Hon'ble Gujarat High Court recognised the concept of plea bargaining and held that the very object of law is to provide easy, cheap and expeditious justice by resolution of disputes, including the trial of criminal cases and considering the present realistic profile of the pendency and delay in disposal in the administration of law and justice, fundamental reforms are inevitable. There should not be anything static. It can thus be said that it is really a measure and redressal and it shall provide a new shape in the judicial system.

III. PROCEDURE OF PLEA BARGAINING UNDER THE CODE OF CRIMINAL PROCEDURE

The procedure for plea bargaining was brought in as a result of the Criminal Law (Amendment) Act, 2005. It introduced a chapter XXIA containing section 265A to 265L into the Code of Criminal Procedure, 1973 and it came into effect on 5th July 2006.

According to section 265A, provisions of chapter XXIA shall apply to an offence appears to have been committed by an accused for which the maximum punishment does not exceed seven years. This chapter does not apply where such offence affects the socio-economic condition of the country or has been committed against a woman or a child below the age of fourteen years. The Central Government has the powers to determine the offences affecting the socio-economic condition of the country.[23]

According to section 265B, application for plea bargaining may be filed by an accused in a curt where the trial for such offence is pending. Such application shall contain brief description of the case including the offence to which the case relates and shall be accompanied by an affidavit by an accused of his voluntarily preferring the plea bargaining and that he has not previously been convicted by a court in a case in which he had been charged with the same offence. Thereafter the court shall issue notice to the Public prosecutor or the complainant and to the accused to appear on the date fixed for the case. Then the court satisfy itself that the accused has files the application voluntarily by examine him and then the court shall provide time to the Public prosecutor or the complainant and to the accused to work out a mutually satisfactory

[20] State of UP v. Chandrika, (1999) 8 SCC 638
[21] Kirpal Singh v. State of Haryana (1999) 5 SCC 649.
[22] State of Gujarat v. Natwar Harchanji Thakor, (2005) Cr.L.J. 2957
[23] Section 265A (2), Code of Criminal Procedure, 1973

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disposition of the case. If the court finds that the application has been filed involuntarily or the accused as previously been convicted by a court in a case in which he had been charged with the same offence, it shall proceed further in accordance with the provision of the CrPC from the stage such application has been filed.

The Court has to follow some procedures such as issue notice to the public prosecutor, the police officer, the accused and the victim to the case to participate in the meeting to work out a mutually satisfactory disposition of the case. It is the duty of the court to ensure that the process of working out a satisfactory disposition of the case is completed voluntarily by the parties participated in the meeting.26 After the satisfactory disposition has been worked out, the court shall prepare a report signed by its presiding officer and other participated parties in the meeting

After a satisfactory disposition of the case has been worked out, the court has power to dispose of the case by awarding compensation to the victim in accordance with the mutually agreed disposition and hear the parties on the quantum of the punishment. The court can also release the accused on probation of good conduct or after admonition under section 360 or for dealing with the accused under the provisions of the Probation of Offenders Act, 1958 or any other law for the time being in force.

The court may sentence the accused to half of minimum punishment. If the court find that the offence committed by the accused provides for maximum punishment, then the court may sentence one-fourth of the punishment provided for such offence. The judgement of the court shall be delivered in an open court and signed by the presiding officer of the court.31 The judgement delivered by the court shall be final and no appeal shall lie against it but one can file special leave petition under Article 136 and writ petition under article 226 and 227 of the Indian constitution. For the purpose of discharging functions under this chapter, the court has all the powers vested in relation to the disposal of a case in such court. Section 265I provides that the provisions of section 428 shall apply for setting off the period of detention by the accused undergone by the accused against the sentence of imprisonment imposed under chapter XXIA in the same manner as they apply in respect of the imprisonment under other provisions of the code. The statements or facts stated by an accused in an application for plea bargaining filed under section 265B shall not be used for any other purpose except for the purpose of plea bargaining. Section 265L states that the chapter XXIA shall not apply to any juvenile or child.

IV. ADVANTAGES OF PLEA BARGAINING

(A) Benefits in respect of Defendant

- It gives relief to thousands of under trials who are languishing in various jails across

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the country.

- If minimum punishment has been provided for the offence committed by the accused, he may get half of such minimum punishment.
- If the offence is not covered under such punishment, an accused get one-fourth of the punishment for such offence.
- Statements stated by an accused shall not be used for any other purpose except for plea bargaining.
- In plea bargaining, trial is speedy and less expensive and matter resolves quickly.
- If an accused opts for plea bargaining then less serious or less socially stigmatizing offences appears in his records which will be very beneficial for him in future.
- An accused may be released on probation of good conduct.
- No appeal shall lie against the judgement in plea bargaining, this will save him from extended trial.

(B) Benefit in respect of Prosecutor/Judges

- Plea Bargaining help prosecutors to improve their convictions rate and also help them to testify against other accused.
- Victim gets compensation and saved from long process of judicial system.
- Victims do not have to go through long and complex judicial procedure and got saved from any kind of trauma.
- It is time and money consuming.
- It also improves the record of judges by ruling out the risk of overturn their judgments on appeal.
- Helps in reduction of the burden on Indian Judicial system.
- Plea Bargaining assures conviction even if it is for lesser charge.
- Plea Bargaining gives both prosecution and defendant some control over the result.

V. DRAWBACKS OF PLEA BARGAINING

- It is unfair to the judicial system as it gives escape route to an accused from proper justice.
- Sometimes it results in conviction of apparent accused who pleads guilty in behalf of

real culprit for money or any other reasons.

- It involves coercion by force, hard coercion (prosecution offers some incentives to defendants that they cannot refuse to sign plea bargaining application) and soft coercion (inducement on the defendant to make the choice which seems rational)
- It is unconstitutional short-cut as it may amount to waiver of the right to fair trial by the accused.
- Sometimes an accused is released on probation in serious offence.
- It may result into corruption as an accused may bribe the prosecution to get reduced term.
- Pressures to maintain good conviction rate may result into conviction of the innocents.
- Victim can be bribed to agree to settle for a lesser charge.
- Plea bargaining would encourage criminals, increase crimes and breed corruption as it condone criminal activities on payment of fine or compensation or both.
- In India where literacy is low, scheme of plea bargaining may be misused.
- Plea of guilty is a very diluted and partial admission of only some of the charges.[24]

VI. CASE LAWS OF PLEA BARGAINING IN INDIA

In a case before Mumbai Session Court, Sakha Ram Bandekar was accused of siphoning of Rs. 1.48 crores from the RBI by issuing vouchers against fictitious names from 1993 to 1997 and transferring the money to his personal account. He was arrested by the CBI on 24 October 1997 and was released on bail in November the same year. Charges were framed on March 2, 2007. The accused moved an application of plea bargaining before the court and stated that he is 58 years old. The court directed the prosecution to file its reply. CBI opposed the application by stating that "the accused is facing serious charges and plea bargaining should not be allowed in such cases". Based on these submissions, the court rejected his application.[25]

In Vijay Moses Das v. CBI,[26] it was alleged that sub-standard items were supplied by the petitioner and that too in wrong port. ONGC got the matter investigated through CBI. Charges were framed against the accused. Offences alleged to have been committed by the petitioners are punishable under Section 420, 468 and 471. All the three offences are punishable with

[24] Mohd. Ajmal Amir Kasab v. State of Maharashtra, (2012) 9 SCC 1.
[25] Kartikeya, "First Plea Bargaining case in city", The Times of India, October 15, 2007
[26] Vijay Moses Das v. CBI, 2010 SCC OnLine Utt 369; (2010) 69 ACC 448

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maximum imprisonment for a period of seven years. Application for plea bargaining was moved before the trial court. CBI and ONGC has no objections against an application. Trial Court rejected the application as an affidavit under section 265B was not filed along with an application. The Hon'ble High Court of Uttarakhand directed the trial court to accept the 'plea bargaining' sought by the accused as he is not the previous convict and has filed an affidavit before this court.

In Ranbir Singh v. State[27], on 5th August, 2000 the deceased Inder Singh along with his wife Smt. Geeta boarded the bus under DTC operation being driven by the Petitioner. When Inder Singh started deboarding from the front door of bus, the petitioner suddenly drove the bus resulting him falling down from the bus on the road. The Petitioner moved an application for plea bargaining. During the proceedings mutually satisfactory disposition was arrived at by paying compensation to the wife and daughter of the deceased in addition to the compensation of Rs. 8 lakhs awarded by the learned MACT. After mutually satisfactory disposition, the trial court awarded maximum punishment to the petitioner.

The petitioner presented an application under article 223 before Hon'ble High Court against the judgement of the trial court. The High Court held that the trial court failed to consider the mitigating factors after awarding maximum punishment. The trial court was duty bound to consider the mitigating factors. The petitioner is the first time offender and he has compensated the victims to their satisfaction. Therefore the court held that the petitioner would have undergone sentence of imprisonment for a period of four months for offence punishable under Section 304A IPC and a fine of Rs. 1,000/- for offence punishable under Section 279 IPC.

In Guerrero Lugo Elvia Grissel v. State of Maharashtra[28] , the accused (foreigner) were arrested on charge of theft of diamond worth crores of rupees from a jewellery shop in an international exhibition during August 2010.

He moved an application for plea bargaining before the court. The court examined the application and satisfied that it is moved voluntarily. Both the complainant and accused agreed in mutually satisfactory disposition that accused has to pay Rs. 55 lakhs to complainant as compensation and Rs. 5 lakhs to the court as expenses incurred during the case by the state. The state agrees to the disposition. The offence committed by an accused is punishable for 7 years so the court may sentence the accused to one-fourth of the provided punishment under section 265E (d). Bombay High Court confirmed the conviction of 21 months and justified the scheme

[27] Ranbir Singh v. State, Crl. M.C. 1705/2011.
[28] Guerrero Lugo Elvia Grissel v. State of Maharashtra, 2012 SCC OnLine Bom 6; (2012) 2 Mah LJ 369

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of plea bargaining.

Pakistani-American David Coleman Headley, being a member of Lashkar-e-Toiba's (LeT), charged with 26/11 Mumbai terror plot and conspiring to target a Danish newspaper. He pleaded guilty to all 12 charges before the US court to bargain for lighter punishment than the maximum death penalty. In light of Headley's past cooperation and expected future cooperation, the Attorney General of the United States has authorised the United States Attorney in Chicago not to seek the death penalty against Headley.[29]

VII. CONCLUSION

The concept of plea bargaining is undoubtedly, a disputed concept as Supreme Court held it unconstitutional, immoral or illegal but on other side the Law Commission of India advocated it and recommended to add it in the Code of Criminal Procedure. It is money as well as time consuming therefore it is of great help in reducing the burden on Indian judicial system of judicial backlog and help the overburdened criminal courts. But it is not like that this concept work as a miracle, which will change the whole system all of a sudden. It has to be more effective and along with this concept there is need of some other methods to improve the condition of our judiciary. On the one hand it help accused to get minimum punishment and may be released on probation of good conduct but on the other hand it involves conviction of innocent or apparent accused and involves corruption. Sometimes accused take this concept for granted, they misuse this concept. As this concept helps accused getting lesser punishment so the crime rate is rising up as the accused are being assured to get leniency in getting punishment. There must be some safeguards to apply the concept of plea bargaining after taking considerations of all the facts such as nature and gravity of offence, previous records of an accused etc. To reduce this system being misused, the role of police and even the affluent will be considerably reduced. Even after presence of plea bargaining in the stature book for more than 10 years, its use is very low and the court is still overburdened with pendency of cases and judicial backlogs. Its main purpose is to speeding up the disposition of case but it is not being used in a proper way. There is need of spreading awareness among litigants, prosecution agencies, police and general people to make this system more effective and there should be thorough study of its working and its impact on conviction and crime rate and how should this system work in a proper way. To make this more useful and to fulfill its desired objectives, there is need to amend the provisions to cope with drawbacks or criticisms and to move with the present needs.

[29] "David Headley pleads guilty to all 12 charges, escapes extradition, death", March 19, 2010

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