



## Evidentiary Value of Forensic Psychological Investigative Techniques in Indian Judiciary – A Case Study of Judgments.

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**Abstract:** Crime has always seen a significant growth over successive years in India. The increase in number of crimes is always directly proportional to the pendency of cases. The crimes and criminals in the modern era differ from those of conventional times and therefore the physical evidence left on the crime scene is nil or negligible thus Investigating agencies always face difficulties to gather evidences, which connects them to the perpetrator. Further, the investigating agencies may list down possible suspects in a case; however, their involvement in the case has to be proved in the court by the prosecution. FPIT's (Forensic Psychological Investigative Technique's) such as Polygraph, BEOS (Brain Electrical Oscillation Signature Profiling), and Narco- Analysis which are byproducts of amalgamation of psychophysiological principles and technology have seen significant dependency upon them as a scientific aid in investigation and corroboration. These instruments individually and collectively have been used in various cases for varying purposes such as screening of suspects, determining the deception within the suspects and perpetrators as well as showing suspects experiential knowledge of participation in a crime. However, credibility of these FPIT's have been questioned several times, when, there have been several reports claiming that individuals have been convicted or granted bail based on these tests. As established in the case of Selvi & others vs State Of Karnataka on 5 May, 2010 the evidentiary value of these tests is only corroborative. The question therefore arises whether individuals have really been convicted or granted bail based on these tests and what was the basis for the same. Hence, this study aims to examine the interpretation of results of these FPIT's by the honorable courts in India and their evidentiary value by a case study of five judgments.

### 1. INTRODUCTION

Forensic Psychology can be defined as amalgamation of principles of Psychology, Forensic Science and Law for enhancing effective justice delivery system. The practices and principles of forensic psychology has seen drastic rise in Indian Criminal Justice System over past decades. Forensic Psychology offers broad range of services such as DDT's (Deception Detection Technologies) like Polygraph, Narco Analysis, BEOS (Brain Electrical Oscillation Signature Profiling), Layered Voice Analysis, Suspect Detection System and other methods including Psychological Autopsy & Offender Profiling etc. Although these techniques in several instances have proved to be a boon during high profile investigations, the reliability of the same has been scrutinized several times oscillating back and forth with regard to admissibility of derived evidences using these techniques. With the evolving trends in technologies and their easy access, the criminals of modern era differ from the conventional ones in terms of higher accuracy of planning and executing the crime leading to difficulties in gathering evidences for investigation. In such Situations FPIT's like BEOS, Polygraph and Narco-Analysis can be helpful in indicating deception among the suspects and thus aiding in further Investigations.

#### 1.1 Indian Legal System

The Indian Criminal Justice system recognizes the role of government scientific expert as per the section 293 of the CRPC which in simple terms state that any report given by a government scientific expert regarding any matter submitted to him for examination or analysis may be used as evidence in any enquiry trail or proceeding. The court may, if it thinks fit, summon and examine any such expert as to the subject matter of his report. Under Section 45 of the Indian Evidence Act, an expert witness' testimony is considered as admissible. The expert's opinions are discussed in this section. "When the court has to form an opinion upon a point of foreign law, science, or art, or as to identity of handwriting (or finger impressions), the opinions upon such point of persons especially skilled in such foreign law, science, or art, (or in questions as to identity of handwriting or finger impressions), are relevant facts"<sup>1</sup>. An expert witness, however, is not a fact-based witness. His evidence is more of an opinion than anything else. In order for the judge to establish his or her own independent judgment by applying such criteria to the facts supported by the case's evidence, the expert's job is to provide the judge with the essential scientific criteria for evaluating his reports' accuracy. If understandable, compelling, and tested, the scientific opinion-evidence can be taken into account with other pieces of evidence in

a case. An expert witness's credibility is based on the quality of the arguments made in favor of his conclusions as well as the evidence and supporting documentation provided<sup>2</sup>.

## 1.2 Polygraph

A polygraph, often referred to as 'Lie Detector' in a layman's term is an instrument used for measuring and recording body's physiological responses including blood pressure, pulse rate, rate of respiration and electro dermal activity of the skin of a suspect while he is being asked series of questions pertaining to his involvement in criminal activity<sup>3</sup>. The underlying principle behind the polygraph is difference in the physiological responses produced in an individual during deceptive questions when compared to non-deceptive questions due to activation of the body's autonomous nervous system during lying that leads to increase in blood pressure, heart rate, rate of respiration and changes in electro dermal activity of the skin. These Changes are recorded and measured by sensors of polygraph attached to the suspects body when he is being interrogate<sup>3</sup>.

Administration of polygraph is a three phased process:

- Pretest interview: During Pretest interview the Forensic Psychologist interviews the suspect based on the relevant information provided by the investigating officer of the case in order to prepare the questions for the polygraph examination. The consent of the suspect is also taken during this stage.
- Polygraph recording: It is during this process the subject is questioned to measure his physiological responses, however before asking questions directly related to the crime a baseline is established by asking questions which are not related to the case.
- Diagnosis & Reporting: The scoring is done to diagnose a lie wherein the difference in the physiological responses of questions related to the crime from the baseline questions is considered to be sign of lie<sup>3</sup>.

## 1.3 Brain Electrical Oscillations Signature Profiling (BEOS)

Brain Electrical Oscillations Signature Profiling (BEOS), is an investigative tool developed by Prof. (Dr) C.R Mukundan. BEOS is a computer-based technology that analyzes electrophysiological data from the scalp of the suspect and identifies the presence of " Experiential knowledge" (EK) of participation in the crime. This technique is used for extracting a signature of electrical oscillations from the background electrical activity of the brain of a subject by presenting them auditory cues relating to crime they have committed. These auditory cues are called probes. The signature contains reference to an " Experiential Knowledge "(EK) in the subject to an act committed by the person, and which is elicited by the probe The probe makes the subject become aware of the experience or the action, if he or she has committed that action. There is a difference between an innocent individual and a perpetrator that is a perpetrator of crime actually commits the crime and has its knowledge his memory signatures, which would be absent in the memory signatures of an innocent person. Therefore, BEOS scientifically detects the presence or absence of such specific information<sup>4</sup>.

## 1.4 Narco – Analysis

The Narco-Analysis is an invasive technique involving intravenous administration of Barbiturates such as sodium pentothal, sodium amytal and scopolamine to the suspect leading to hypnotic stage and divulging information which he may not in the conscious stage. The Narco- Analysis required a group of specialists including an anesthesia specialist, a psychiatrist and a forensic psychologist. The questions are structured and open ended and are formed after the pre – test interview of the suspect as well as the interview of the investigative officer. An in-depth medical examination is necessary for an individual to undergo Narco-Analysis. Individuals with underlying physical or mental illness or individuals prone to substance abuses are restrained from Narco- analysis tests. ECG and blood pressure of the suspect are measured throughout the entire procedure of Narco – Analysis and the process is video graphed<sup>5</sup>.

## 1.5 Legal Status & Evidentiary Value of DDT's in India: Guidelines of Selvi vs. State of Karnataka

The legal status of DDT's in India has always been a debatable topic with regard to their legality of using inhumane degrading methods for making an Individual to confess the crime. The right to remain silent is a legal right recognized by Article 20(3) of the Indian Constitution and Article 11 of 'Universal Declaration of Human Rights'<sup>6</sup>. The right against self-Incrimination most prominently known as right to remain silent has also been listed under Section 161(2) of the CrPC stating that "every person is bound to answer truthfully all questions, put to him by [a police] officer, other than questions the answers to which would have a tendency to expose that person to a criminal charge, penalty or forfeiture"<sup>7</sup>. The right to remain silent was also established by the supreme court in the case of 'Nandini Satpathy vs Dani (P.L.) And Anr on 7 April, 1978'<sup>8</sup> and involuntary administration of these tests as established in the case of 'Selvi & Ors vs State Of Karnataka & Anr on 5 May, 2010'<sup>9</sup>, nullify the legitimacy and validity of right to remain silent, however if administered voluntarily the evidentiary value of these testes could be admissible in the ambit of section 27 of the Indian Evidence Act and guidelines of 'The State Of Bombay vs Kathi Kalu Oghad And Others on 4 August, 1961', "Provided that, when any fact is discovered by any information received from an accused of any crime, in the custody of a police- officer, whether in the form of confession or not, leads to discovery of any fact linked with the offence, such fact or related evidence may be proved"<sup>10</sup>. Further for such administration of DDT's the following guidelines have been laid by Supreme Court & National Human Rights Commission:

- DDT's should not be administered, unless the consent of the accused is acquired after giving him option to avail the test.
- If any accused consents for these tests, the physical emotional and legal implications of such testes should be explained to him by lawyer and the investigating officer.

- The consent of the accused is considered to be valid only when such consent is recorded before a judicial magistrate in presence of the accused's lawyer
- The accused should also be informed in clear terms that while administration of these DDT's any statement made by the accused shall not be considered as 'confessional statement made before a magistrate', rather it would have status of confessional statement made before a police officer as per section 25 of the Indian Evidence Act.
- Administration of these DDT's should be done by independent agencies in presence of the lawyer.
- A full length medical examination of the accused to ascertain his fitness for these tests should be conducted prior to administration of these tests.
- All the principles established by the supreme court in the case of 'D.K. Basu, vs State Of West Bengal, on 18 December, 1996' relating to the entitlement of person in custody to lawyer and access to legal advice in order to prevent custodial abuses shall be valid here too<sup>11</sup>.

According to Cowan in his article "Decision Theory in Law, Science, and Technology", "the aim of science, traditionally put, is to search out the ways in which truth may become known. Law aims at the just resolution of human conflict. Truth and justice, we might venture to say, having different aims, use different methods to achieve them. Unfortunately, this convenient account of law and science is itself neither true nor just. For law must know what the truth is within the context of the legal situation: and science finds itself ever engaged in resolving the conflicting claims of theorists putting forward their own competing brands of truth<sup>12</sup>." The simplest meaning of the quote would be law must use scientific methods to resolve human conflicts and therefore the voluntarily use of these DDT's as per the issued guidelines are beneficial.

## 2. MEANS & METHODS

The entire research is based on Meta-Analysis, wherein the analysis of Judgments available on "Indian Kannon" a public domain was done, out of which detailed case study of five Judgments, where these Forensic Psychological Investigative Techniques played a prominent role was carried out. Although the Judgments were available in the public domain with all the case details, the names of suspects, victims and witnesses, their identity has not been revealed anywhere in the paper pertaining to the ethical standards.

## 3. CASE STUDY OF JUDGMENTS

### 3.1 Murder of Editor in Chief of Dakshin Gujarat Vartaman.

The case dates back to the year 2015, when the victim, Editor in Chief of Dakshin Gujarat Vartaman along with his driver (complainant) was going towards his office at Valsad in a Maruti van. During such journey, the complainant was driving the vehicle and victim was sitting in front seat adjoining to the driver. It was further stated by the complainant while they were proceeding victim's office one golden colour Innova car had overtaken their car and intercepted them after which Alto car had also come behind their car, due to which the complainant stopped his car all of sudden, after which a person of whitish complexion came outside of alto car and fired two bullets on to the victim, wherein one hit the victim's eye and other hit his chest leading to his death. The case caught high attention when it came to limelight that the victim was working on two high profile cases among which were the land grabbing case worth a thousand crore rupees of the government under the pretext of social work and the other case was regarding illegal alcohol smuggling from Daman and Dew to Gujarat with the involvement of high ranking police officials. These angles were considered to be the possible reasons behind the murder of the giving it an outline of organized crime. Following the reconstruction of the crime scene by the police and finding discrepancies in complainant's version of story, the court ordered BEOS & Narco Analysis of the complainant at FSL Gandhinagar, based on which the following facts were discovered:

- The complainant disclosed that a lady who had connections with the land grabber used to frequently meet with the victim to seek his help against the land grabber.
- The land grabbers were continuously threatening the victim and they had contacted him (complainant) to get minute details of victim's day to day activity.
- The Complainant also agreed that land grabber had given him lot of money to provide information about victim's daily routine and he had joined hands with them.
- It was also discovered that the complainant gave signal to the contract killers to fire at the victim.
- The complainant had also pointed out that the lady and the land grabber had jointly made plans to kill the victim.

Based on the facts discovered after using DDT's it was discovered that the complainant was also involved in the murder of the victim. The reports of these DDT's and other circumstantial evidence was critical aid in investigation and were endorsed by honorable bench of Gujarat High Court<sup>13</sup>.

### 3.2 Dual murder of an old couple at Gwalior

The case dates back to the year 2014, when an old couple in the Purani chhwani village of Gwalior district were murdered brutally. Based on prima facie evidence and Investigations the police identified three suspects who were subject to BEOS Profiling at Gandhinagar FSL. The Reports of the BEOS report indicated that one of the three suspects was not involved in the crime whereas the other two individuals response's show experiential knowledge of participating in the crime. The scientific officer who

conducted the BEOS profiling of three suspects pointed out further that the profiling of the suspects revealed reference to some anonymous person who offered money to them for murdering the old couple. It was based on this report one of the suspect who dint show any signs of deception was given benefit of doubt and finally was granted bail and the court also considering the BEOS reported ordered the SP of the Gwalior District to supervise the investigation directly by constituting a committee consisting of Government Scientific Expert from Forensic Science Laboratories<sup>14</sup>.

### 3.3 Investigation of offence registered under POCSO Act in Ahmedabad

The Prevention of Children from Sexual offences Act case dates back to year 2018, where a teacher of municipal school in Ahmedabad was accused of raping 7 year old minor girl by the girl's family and it was also stated by them during the filing of FIR that the accused had molested four more girls along with theirs during the recess time by tying their hands with handkerchiefs. However the accused made submissions that he is being falsely implicated in the case due to the prior dispute with the family members of victim regarding the leaving certificate and admission of the victim in the school. The statement of the victim were not supported by any of her classmates while the accused was alleged for raping other 4 minors along with the victim. The suspect's claim of falsely being implicated in the case was supported by the women constable's statement who was accompanying the victim and her family members for medical examination at government hospital. It was stated by her that the victim was tortured and fully prepared by her family members and while doctor was recording the victims statement and enquiring her about the incident, victims grandmother was making sign regarding tying a handkerchief on the face and was also showing the signs of pinching.

The court ordered for Polygraph BEOS and Narco Analysis of the accused for which the accused gave his consent and all three examinations were performed and following were the outcomes:

- The polygraph report was insignificant and there were no signs of deceptions in the accused.
- On analyzing the BEOS report of the suspect regarding committing sexual assault on the victim, the experiential knowledge was not found, however the sequential experiential knowledge was found on probes like "I am Innocent and I am being falsely implicated in the case", pointing towards his innocence.
- The Narco-Analysis of the suspect also pointed out towards the innocence of the suspect where in it was found that the suspect has not committed the alleged act with the victim or any other minor. He also stated during the Narco analysis that if any child plays mischief, he used to beat lightly on the back of the child.

The opinion of the scientific expert after all three tests stated that. "Considering the case papers, Discussions with the Investigating Officer, Pre- Test interview of the Suspect, his test results and the statement of other minors are not corroborating or substantiating the allegation made by Victim's Family".

The results of these tests were further corroborated with following facts in issue of the case:

- Based on the Geographical Condition of the room where the alleged incident had occurred, it was found out that it was possible to witness the incident taking place inside the room from the windows of the room. Since it was reported that the alleged incident happened during the recess, it is hardly possible that such kind of incident happen here and go unnoticed.
- It was also found out from the statements of other children that when the incident occurred, the victim was playing with them.
- During the Recess time, when this alleged incident was reported to have happened the accused was having lunch along with his counterparts in the staffroom.

The reports of the DDT's in corroboration with other facts supporting the investigation were endorsed by the Court and the accused was granted conditional bail while the trail still continuous. The court further ordered that the witnesses of this case, that is the family members of the victim should also be subjected to these scientific test in order to make the picture clearer<sup>15</sup>.

'Justice JB Paridwala' while granting bail to the accused appreciated the use of these scientific tolls by saying:

*"It is only with the aid of the results of the three scientific tests that I am in a position to reach to an appropriate conclusion whether I should exercise my discretion in favor of the applicant - accused or not. If I would have gone only by the say of the victim and her family members and rejected this bail application, then probably, I would have done injustice with the applicant. It is true that in a given case mere statement of the victim may be sufficient not only to decline bail but even to convict the accused for the offence of rape, but the case must be of such type and the evidence also should be of that nature".*

### 3.4 Writ Petition to transfer the murder investigation from CID to CBI after 8 years

The case dates back to 2011 involving prominent politically influential figures of the Kolkata city, wherein the victim was shot dead while commuting on his bike after meeting one of the suspect. As per the news reports and the FIR filed by respondents (Victim's) parents, the victim was having affair with the accused who was a married women, who had a child and was daughter in law of a politically influential person. Following the leak regarding their affair clashes between the suspect and the victim, they decided to end their affair. The victim was called by the Accused with the pretext of meeting and was shot dead while returning back. Subsequently the case was transferred to CID West Bengal and while investigation was carried out the IO's were transferred 4 times in the time frame of fourteen months. The respondents of the case filed the writ petition at High Court of west Bengal stating that CID has been trying to hide a lot of facts in the case and misleading the investigation, therefore requesting for the transfer of the case to CBI.

The Accused along with her husband, Father in Law and one more Suspect, who used to work for the accused's father in law were subjected to Polygraph Examination and the following facts were discovered:

- The Accused's polygraph results indicated deception and the scientific officer was of the opinion that she had an affair not only with the deceased victim, but also had an affair with one of her father in law's staff who was the co conspirer murder of the victim.
- Upon which the Polygraph examination was also conducted upon the Co Conspirer which indicated deceptive results too.
- The scientific officer also gave the opinion that CID never interrogated the suspects of the case in this direction by addressing the letter to the court.

The High Court therefore considering the polygraph report stated that the CID had been playing the role of gullible infant who never investigated accused regarding any conversation she had with the victim right before his death. By considering these facts and the results of the polygraph the court the court stated that:

*“On the backdrop of the above mentioned non-action of CID it naturally has created an impression in my mind that CID has tried to show outwardly by that it seriously investigated the matter, when in fact CID despite having materials before it did not take any effective step to elicit the truth and I find the investigation by CID in this matter is wholly perfunctory”.*

The DDT's in this case were instrumental in determining the follies and gaps in the investigation based upon which the case was transferred to the CBI in the year 2018<sup>16</sup>.

### 3.5 Love triangle and Murder by Poisoning

This Tragic case was reported At Wakad, Pune wherein the victim, 25 old MBA student as poisoned by his Ex-Girlfriend and her Husband. The Deceased Victim and the Primary Accused (girl) were in relationship from their engineering days and they had decided to get married after their MBA, which was also approved by their parents. But During the first semester of MBA the accused distanced herself from the victim and fell in love with another person (the Co-accused of the case) and broke up with the accused. Both the accused left the MBA course after first semester and moved to Noida as the boy got a Job leaving the victim dejected. The victim's parents were aware of these clashes and they persuaded the victim to concentrate on his education first. As per the CDR records and the FIR filed by Victims parents, the suspect called the victim's mother to get victim's mobile number and called the victim saying she is at Pune and was wanting to meet him. Victim went to meet the suspect, where she offered him the Prasad consisting of arsenic poison which the victim consumed. After returning back the victim told his roommates about the entire meeting after which he started to have excess vomiting and motions and became seriously ill during the midnight due to which his friends admitted him at the hospital. The victim was shifted to ICU in the hospital the next day as he was unresponsive and during the course of treatment he died. Both the viscera analysis by the doctors of the Hospital and Victim's Post-mortem confirmed the presence of arsenic poison in high amount in the victim's body. Based on the information received by the Victim's friends and parents regarding his last meet with the suspect, the police arrested both the suspects from a hotel wherein the suspects rented the room with a fake name and ID. The suspects were sent for polygraph and BEOS examination at Mumbai FSL where in the Polygraph report indicated deception and Experiential Knowledge of consensual poisoning was detected during the BEOS Profiling of the suspects. The Reports of these DDT's supported the following relevant facts and were corroborating with other evidences including:

- The Call records between the victim and the suspect.
- The Hotel's entry register showing the Fake Id's and names of the suspects along with their identity confirmation by the manager of the hotel.
- The Suspect had made a call to the hospital using a public telephone in order to enquire about the condition of the victim. The owner of the STD both was one of the witnesses of the case who confirmed the identity of the suspect using the public telephone.
- The case has a total of 36 witnesses consisting of the victim's parents, friends, roommates and the doctors who treated the victim.

Based on the above evidences, pointing out clear planning and motive the court convicted both the suspects for life time imprisonment. The court while forming the Judgment relied upon the case of 'Ramchandra Ram Reddy vs The State Of Maharashtra on 5 March, 2004'<sup>17</sup>, where in the apex court ruled that “ all these tests are not in the nature of testimonial compulsion, when administered by following all the relevant guidelines they do not in any way violate Article 20(3)of Indian Constitution, Therefore recourse to such testes can be taken whenever the investigating agency seeks to produce outcomes of such tests as evidence”<sup>18</sup>.

### 4. Discussion & Conclusion

Forensic psychological investigative techniques like polygraph, BEOS & Narco- Analysis has been gaining wider prominence in India as an aid to investigative agencies. As seen from above Judgments the courts from time to time have endorsed these techniques for providing direction and clarity to the investigations and also have appreciated the evidence elicited out of these techniques. The use of these FPIT's have been scrutinized several times claiming them to be unconstitutional, however the honorable courts have never branded these tests to be of unconstitutional nature, rather its unconstitutional if administered without individuals consent. Consensual use of these techniques by following all the guidelines of NHRC is valid and as seen in the above judgments court's themselves have ordered not only the suspects but also the complainants to undergo these tests for clarity in

the cases. The above cases are classic examples where in the courts have considered the evidentiary value of these tests as prominent when corroborating with other supporting facts and evidences. The courts with the help of these tools have not only convicted the individuals but also have granted bails to the suspects even in offences of heinous nature such as POCSO and homicide. These tools have also been effective to access the quality of investigation being carried out by police officers and as seen in one of the cases, it was only due to the reports of these techniques the case was transferred from a state agency to national agency. Without any doubt it can be concluded that these FPIT's are effective aid for detection Investigation and corroboration and courts have been giving them due prominence as modern scientific techniques admissible as corroborative evidence and falling under ambit of section 45 of the Indian Evidence act and Section 293 of Code of Criminal Procedure.

## REFERENCES

- [1] Indian Evidence Act (1872).
- [2] State Of Himachal Pradesh vs Jai Lal And Ors on 13 September, 1999 SC Case No.530/1997. <https://indiankanoon.org/doc/1652872/>
- [3] Gordon, Nathan J. 2016. Essentials of Polygraph and Polygraph Testing. CRC Press. <https://doi.org/10.1201/9781315438641>.
- [4] C.R. Mukundan. 2007. Brain Experience. Atlantic Publishers & Dist.
- [5] Bada, Suresh. "Supreme Court Judgment on Polygraph, Narco-Analysis & Brain-Mapping: A Boon or a Bane." Indian Journal of Medical Research, vol. 134, no. 1, July 2011, pp. 4–7, [www.ncbi.nlm.nih.gov/pmc/articles/PMC3171915/#ref7](http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3171915/#ref7).
- [6] United Nations. 1948. Review of Universal Declaration of Human Rights. <https://www.ohchr.org/en/human-rights/universal-declaration/translations/english>.
- [7] THE CODE of CRIMINAL PROCEDURE. 1973. Sec. 161. <https://legislative.gov.in/sites/default/files/A1974-02.pdf>.
- [8] Nandini Satpathy v. P. L. Dani, (1978) 2 SCC 424. <https://indiankanoon.org/doc/1938988/>
- [9] Selvi & Ors vs State Of Karnataka & Anr on 5 May, 2010 SC CA No. 1267/2004. <https://indiankanoon.org/doc/338008/>
- [10] The State Of Bombay vs Kathi Kalu Oghad And Others on 4 August, 1961 SC Case No.146/1958. <https://indiankanoon.org/doc/1626264/>
- [11] D.K. Basu, vs State Of West Bengal, on 18 December, 1996 SC WP No.582/1987. <https://indiankanoon.org/doc/501198/>
- [12] Cowan, Thomas A. 1963. "Decision Theory in Law, Science, and Technology" 140 (3571): 1065–75. <https://doi.org/10.1126/science.140.3571.1065>.
- [13] Ahteshamudin vs State Of Gujarat on 17 August, 2015 HC Case No.14123/2015. <https://indiankanoon.org/doc/170522625/>
- [14] Man Singh vs State Of M.P on 22 January, 2015 WP No.5548/2012. <https://indiankanoon.org/doc/131261167/>
- [15] Sunilkumar Virjibhai Damor vs State Of Gujarat on 27 April, 2018 HC Case No.5391/2018. <https://indiankanoon.org/doc/50491571/>
- [16] Samaresh Mridha vs The State Of West Bengal & Ors on 17 May, 2019 WP No.1484/2013. <https://indiankanoon.org/doc/151710409/>
- [17] Ramchandra Ram Reddy vs The State Of Maharashtra on 5 March, 2004 WP No. 65 & 66/2004. <https://indiankanoon.org/doc/1943547/>
- [18] State of Maharashtra V. Aditi sharma and Pravin Khandelwal No.508/2007. <https://lawandbiosciences.files.wordpress.com/2008/12/beosruling2.pdf>