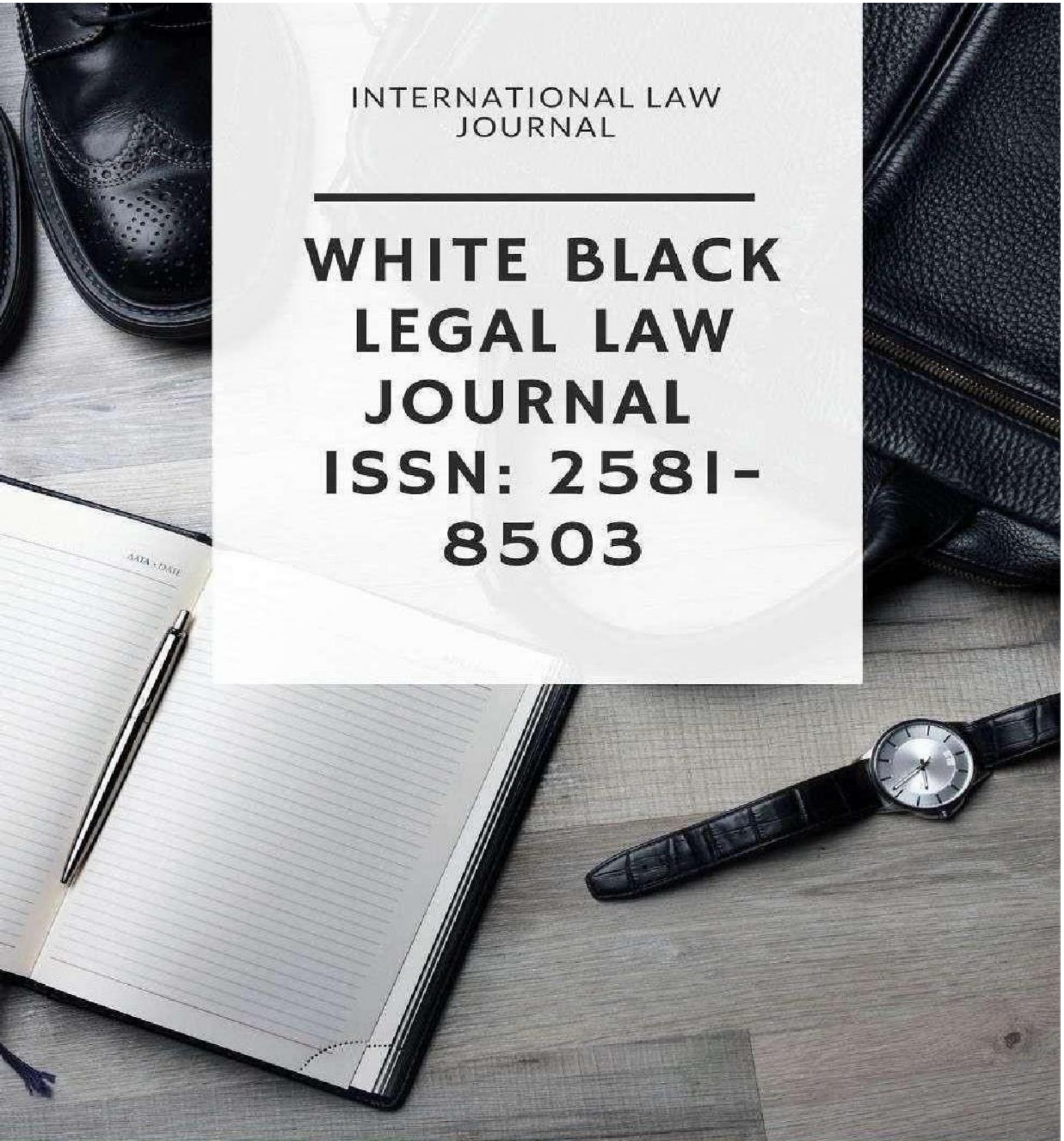




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CASE COMMENTARY ON PRAKASH KADAM V. RAMPRASAD VISHWANATH GUPTA

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ABSTRACT

The issue of fake police encounters has sparked a lot of debate in India. It raises serious concerns about misuse of power, violation of constitutional rights, and the weakening of the rule of law. The Supreme Court's decision in *Prakash Kadam and Others v. Ramprasad Vishwanath Gupta and Others* (2011) is a key judicial response to these allegations.

The case involved the death of Ramnarayan Gupta in November 2006, which the police initially labeled as an encounter killing. However, later allegations indicated that the incident might have been a planned murder involving some police officers and private individuals.

The Supreme Court supported the Bombay High Court's decision to cancel the bail granted to the accused police officers. This was due to the seriousness of the charges and the risk of witness intimidation. The Court made it clear that fake encounters cannot be justified and should be seen as unlawful killings.

It also stated that police officers who misuse their authority betray the trust society places in them and must face strict legal consequences. This research paper examines the facts, legal issues, and reasoning in the case. It also looks at the wider implications of the ruling for police accountability and constitutional governance in India.

1. INTRODUCTION

“Fake encounters are nothing but cold-blooded, brutal murders by persons who are supposed to uphold the law.” Said by Justice Markandey Katju

Criminal law in India has long struggled to balance the interests of the accused with those of justice. The policing method, and in particular the force used by the police during an encounter or in custody, has been a major area of scrutiny. The Supreme Court must go into great detail on how the State can exercise authority without breaching the fundamental rights enshrined under

¹ Aashi prakash, PRAKASH KADAM & ETC.. ETC VS RAMPRASAD VISHWANATH GUPTA & ANR THE AMIKUS QRIAE (2021), <https://theamikusqriae.com/case-comment-2/> (last visited Mar 17, 2026)

Article 21.

Fake encounter is a term used when a person is killed illegally in police custody. Over the years, the judiciary has been dealing with the issue of police officers claiming that they had acted in self-defense. It has always kept in mind the principles of accountability, fair trial, and, of course, the applicable law.

It appears the investigation, which was initially dropped, now provides an opportunity to reinforce the principles of the rule of law and protect fundamental rights, as it pertains to policing public order. This case presents an opportunity to look more deeply into the criminal justice system's response to allegations of excessive use of force and the way policing conduct is either validated or reviewed under criminal law provisions.

If the police men commit this heinous crime, the highest penalty of capital punishment should be imposed upon the policeman who committed it, as has also already been directed by our highest judiciary — Supreme Court of India.

If the murderer is a normal citizen, then it is considered an ordinary murder. But if the murderer is a policeman, then it can be considered as high treason and be punishable by death. A policeman, given the social status entrusted to him, is entrusted with the duty to maintain peace and security in society, yet when he breaches that trust, he deserves such severe punishment.

2. OBJECTIVE

This paper intends to anal

- I. The facts and rules in the case of Prakash Kadam v. Ram Prasad Vishwanath Gupta.
- II. Existing legal and institutional shortcomings that allow for the occurrence of fake encounters;
- III. What reforms/changes need to be made regarding police methodology to promote accountability, transparency, and adherence to due process of law?
- IV. The abuse of police authority, with a focus on extrajudicial killings; and
- V. The role of the judiciary in protecting people's fundamental rights and ensuring that state agencies act within the constraints of the constitution.
- VI. This paper also aims to determine how such judicial rulings can help to develop the rule of law and promote both police accountability via the judiciary and police authority.

3. SUMMARY OF THE CASE

²This case was triggered by the murder of Ramnarayan Gupta, popularly known as @Lakhanbhaiyya in Mumbai in November 2006.

Disputes over Business, Ramnarayan Gupta and Janardan Bhangre were engaged in business of land in which they were carrying out business of acquiring land, which was acquired by the State by applying the Land Acquisition Act. They had acquired this land from those farmers to whom this land had been given at highly concessional rates, and by selling that land to the persons to whom this land was required, by earning more profits. The aforementioned disagreements also led to serious hostilities.

Abduction (November 11, 2006) On 11th Nov 2006, the body of Ramnarayan Gupta, a 30-year-old engineer working on upgrading Mumbai's drainage system, was found at an isolated spot about 10 kilometers from where he was reportedly picked up by the police. Gupta, along with his friend, Anil Bheda were picked up outside a fashion store called Trisha Collections in Vashi's Sector 30 in Navi Mumbai, allegedly by a group of plainclothes police officers.

Gupta and Bheda were taken to the D.N. Nagar police station, in separate cars - a *Qualis* and an *Innova*. On February 13, 2008, the High Court directed the Metropolitan Magistrate (Railway Mobile Court, Andheri) to conduct an inquiry under Section 176(1A) of the Criminal Procedure Code (Cr. P.C.).

The Metropolitan Magistrate thereafter completed the investigation and gave a report dated 11/08/08. In this report, the magistrates found that Gupta was 'shot by a bullet by police' and was 'kidnapped' by the police. The report also concluded that Gupta did not go missing while in police custody before his death, but was instead 'kidnapped' by the police.

Fake Encounter Later in the day, several news channels reported that Ramnarayan Gupta was shot dead by the police near Nana-Nani Park in Versova, Mumbai. The police maintain that Gupta attempted to attack the police, who then had to shoot him in self-defense.

The report further adds that the accused No. 9 (Inspector Pradip Suryavanshi of D.N. Nagar Police Station) had lodged a false First Information Report (FIR) on behalf of the deceased in an attempt to hide the real murder committed by the police against Gupta. The prosecution later claimed that the whole story had been fabricated and that the encounter had been staged after Gupta had already been arrested by the police.

The witness was held in illegal custody, police claimed, when several officers told magistrate

² LakhanBhaiya Fake Encounter by Pradeep Sharma, YOUTUBE, https://youtu.be/6Sfa_2nxCsk?si=IPDY8eiSZLbrmvhy (last visited Mar 17, 2026)

Makrand Kunder that Anil Bheda was “kept” in hiding by them and was kidnapped along with Gupta for about a month.

Anil, who had been languishing in jail, was stopped from talking about his kidnapping by the police, saying the period of custodial interrogation cannot be disclosed as a matter of policy. Kunder recorded the statement of Anil and also the testimony of the officer, Who was responsible for the custody of Anil before he was thrown into jail along with Gupta and Chudasama. Kunder recorded the statement of witness Anil, who was allegedly first kept at the D.N. Nagar Police Station and then shifted to Kolhapur, where he was lodged at the Mid Town Hotel.

4. METHODOLOGY

For this study, we have adopted a doctrinal (analytical) methodology in order to assess the application of legal principles, case law, and additional resources.

Research Type

This study will fall primarily under the qualitative and descriptive categories, reflecting the focus upon legal concepts, judicial principles, and constitutional principles rather than numerical data.

Data Sources

Primary Source

The primary source for this research will be the judgment rendered in *Prakash Kadam v Ramprasad Vishwanath Gupta* by the Supreme Court of India.

Secondary Sources

Additional information gleaned through secondary sources such as textbooks, research literature, legal journal articles, other forms of written legal commentary, and documentation thereof by authorities.

5. HISTORY AND TIMELINE

³November 11, 2006 – It is said that Ramnarayan Gupta was abducted and later found dead in a police encounter.

³ Markandey katju, PRAKASH KADAM & ETC.. ETC VS RAMPRASAD VISHWANATH GUPTA & ANR ON 13 MAY, 2011 PRAKASH KADAM & ETC. ETC VS RAMPRASAD VISHWANATH GUPTA & ANR ON 13 MAY, 2011 (2011), <https://indiankanoon.org/doc/1979158/> (last visited Mar 17, 2026)

November 15, 2006 – Gupta’s brother went to the Bombay High Court and asked for an investigation into the incident by filing a writ petition.

February 13, 2008 – The Bombay High Court ordered that a murder case be filed against the police officers who are said to have been involved.

August 11, 2008 – A magisterial inquiry suggested that Gupta had been shot while in police custody and that the story of what happened didn’t seem to add up.

August 13, 2009 – The Court told the police to set up a Special Investigation Team (STI) to look into the case.

August 20, 2009 – The Complainant’s statement was recorded and used as the First Information Report.

2010: The session court let the police officers out on bail

January 21, 2011 – The Bombay High Court took back the bail that had been given to the accused officers.

May 13, 2011 – The Supreme Court agreed with the High Court’s decision and threw out the appeals made by the accused

5.1 **LIST OF ACCUSED**

Accused No.	Name of the Accused	Position/identity	Alleged Role in the case
1.	Pradeep Sharma	Police Inspector	Allegedly led the police team involved in the encounter and supervised the operation.
2.	Sachin Vaze	Police Officer	Part of the police team is accused of participating in the encounter operation.
3.	Daya Nayak	Police officer	Allegedly assisted in the planning and execution of the encounter.
4.	Sachin kadam	Police officer	Alleged to have helped the encounter team during the operation.
5.	Sanjay Patil	Police officer	Accused of assisting in the police operation related to the encounter.
6.	Vasant Dhoble	Police officer	Allegedly involved in supporting the encounter team.
7.	Nandkumar Gopale	Police officer	Accused of assisting in planning and executing the encounter.

8.	Sunil Deshmukh	Police officer	Alleged to have been part of the police operation.
9.	Pradeep Suryawanshi	Police inspector	Registered the FIR after the encounter, which was alleged to be false.
10.	Police personnel	Police staff	Allegedly assisted the main officer during the encounter.
11.	Nitin Sartape	Assistant Police Inspector	Allegedly participated in the encounter operation.
12.	Police personnel	Police staff	Alleged to have supported the encounter team.
13.	Police personnel	Police staff	Accused of assisting in the incident and related activities.
14.	Janardan Bhange	Private individual	Alleged Conspirator who had a dispute with the deceased and reportedly instigated the killing.
15.	Dilip Palande	Assistant Police Inspector	Allegedly involved in carrying out the encounter.
16.	Prakash Kadam	Head constable	Accused of assisting the police team in executing the encounter.
17.	Ganesh Harpude	Police sub-inspector	Allegedly helped detain and transport the victim before the encounter.
18.	Patade	Police sub-inspector	Allegedly supported the encounter operation.
19.	Pandurang kokam	Police constable	Allegation present at the scene and assisted during the encounter
20.	Pandurang kokam	Police constable	Allegedly present at the scene and assisted during the encounter.
21.	Police personnel	Police staff	Allegedly involved in the conspiracy during the encounter.
22.	Police personnel	Police staff	Accused of assisting the encounter team.
23.	Arvind Sarvankar	Police Sub-Inspector	Allegedly involved in the planning and execution of the encounter.

5.2 CHARGERS FRAMED AGAINST ACCUSED

The charges framed against the accused include multiple offences. Earlier, it was the Indian Penal Code (IPC), and now it has changed with the Bhartiya Nyaya Sanhita (BNS), so let's compare what the previous law says for punishment with today's penalized law.

Section 302 of IPC deals with punishment for murder, and now it is in Section 103 of BNS.

Section 364 of IPC deals with kidnapping or abducting a person in order to murder, and now it is in Section 140 of BNS.

Section 120B of IPC deals with criminal conspiracy, and now it is in section 61 of BNS.

Section 34 of IPC deals with acts done by several persons in furtherance of a common intention, and now it is in Section 3(5) of BNS.

Section 201 the IPC deals with causing the disappearance of evidence or giving false information. Section 238 of BNS.

6. ISSUES RAISED

Revocation of Bail - The court had to determine if the Bombay High Court was right in revoking the prior granting of bail to police officers. The question is whether the seriousness of the accusations would justify a finding to keep them in jail.

Effect of Serious Heinous Charges on Bail - The accused was indicted on charges of serious, grave offences, including murder and conspiracy. The Court weighed whether serious accusations alone would be grounds for denying bail despite there being no evidence that the accused were abusing their freedom.

Likelihood of Coercion on Witnesses and the Case - Another concern was whether the accused had the power, by virtue of their office, to coerce witnesses or otherwise interfere with the investigation because they had just arrested. Additionally, whether granting bail would have impacted the fair process of the trial.

Violation of Right to Life - The issue of whether the alleged false encounter breached the victim's constitutionally protected right to life under Article 21 of the Constitution was addressed in this case. The Court evaluated whether there was any lawful authority for the killing.

7. ARGUMENTS FROM THE PETITIONER (ACCUSED POLICE OFFICERS)

⁴The accused officers provided the following reasons as defenses against criminal charges:

- **Self-defense** - They claimed that the shooting was accidental since the suspect was shot while being confronted by the police, who were compelled to act in self-defense because of his actions.
- **Performance of Duty** - The accused claimed they were executing their duties as police officers and, thus, entitled to legal protection.
- **No Evidence to Revoke Bail** - The defendants argued that no evidence existed to justify canceling their bail.
- **No Murder Intent** - The defense argued that the officers did not intend to kill but acted to prevent a criminal from using a weapon against them.

7.1 ARGUMENTS FROM RESPONDENT (PROSECUTION)

The prosecutor opposed bail for the accused person and argued that:

- **The Encounter was not true** - The evidence indicates that the encounter had been planned before it occurred.
- **Criminal Conspiracy** - The Killing appears to be part of a conspiracy that included both private individuals and police officers.
- **Misuse of Police Powers** - The police officers appear to have misused their authority in an attempt to cover up this incident.
- **Threat to Justice** - Since they are police officers, it is believed that the accused have the potential to intimidate witnesses or have an influence over the investigation.

7.2 DECISION OF SUPREME COURT

⁵The Supreme Court confirmed the ex-Bail order of the Bombay High Court and reasoned that the charges were very serious and involved the abuse of police powers. The Court determined that any time a police officer is accused of being part of a planned murder, that is something

⁴ Prakash Kadam & etc. ETC vs Ramprasad Vishwanath Gupta & Anr, The Amikus Qriac (2021), <https://theamikusqriac.com/case-comment-2/> (last visited Mar 19, 2026).

⁵ Judgements and orders, High Courts of India, HOME, https://scr.sci.gov.in/scrsearch/?p=pdf_search%2Fhome&text=prakash+kadam+&captcha=E2cyzW&search_opt=PHRASE&fcourt_type=undefined&escr_flag=&proximity=&sel_lang=&neu_cit_year=2011&neu_no=396&ncn=&citation_vol=&citation_yr=&citation_supl=&citati_on_page=&app_token= (last visited Mar 17, 2026)

that must be treated very seriously. There are concerns that witnesses may have their testimony influenced or coerced in these types of situations.

The cancellation of the bail was a necessary procedural step to allow for a fair investigation and thus a fair trial. The Supreme Court made strong comments about fake or set-up police encounters, indicating that these types of actions could never be justified as legitimate actions of law enforcement.

The Supreme Court concluded that when police officers work together to falsify encounters to eliminate people from the community, these acts would be classified as unlawful killings. The Court also stressed the responsibility of police to protect the citizens they serve and to enforce the law and not to break it. The Court also stated that if a conviction on these offences were obtained, such crimes would fall into the category of extremely serious crimes that are subject to severe punishment.

8. CONSTITUTIONAL PROVISION

- 1. Article 21 (Right to Life and Personal Liberty)**
- 2. Article 14 (Equality before Law)**
- 3. Rule of law**

In this, the Supreme Court took a strong argument, and the court held that the right to life under Article 21 is absolute except by due process of law. Fake encounters are cold-blooded, deliberate killings, not lawful acts. Such acts amount to state-sponsored murder.

Rule of law and Article 14, the court emphasized that no person is above the law, and allowing fake encounters to destroy the *rule of law* of the state is a basic feature of the constitution. The court rejected the argument that killing criminals without trial is justified, and also stressed that even criminals are entitled to fair trial and due process rule of law judicial oversight; these are part of the constitution's basic structure, which cannot be violated. The court made it clear that state agents (police) are constitutionally bound. Abuse of power invites criminal liability, not immunity. The judgment of this case has a powerful assertion that the Constitution does not permit shortcuts to justice. State power must always operate within constitutional limits.

8.1 PROGRESS FROM PRECEDENT

In *Bhagirathsinh v. State of Gujarat* (1983), the Supreme Court said that bail should not be canceled regularly. This case was about the rules that govern the cancellation of bail. The Court stressed that there must be strong and convincing reasons for cancellation, like the possibility

that the accused will run away or get in the way of the investigation or evidence. It is not enough to cancel because the crime is serious or the facts need to be looked at again.

The Supreme Court looked at the issue of bail cancellation in the case of Bhagirathsinh v. State of Gujarat. The Sessions Court first gave the accused bail, but the High Court later took it away, mostly because of how serious the accusations were and how the victim was doing. The Supreme Court didn't agree with this method and gave the bail back, saying that cancellation cannot be done in a normal way. It said that bail should only be taken away if there are very strong and convincing reasons, like the accused trying to run away, tampering with evidence, or abusing the freedom given to him.

The case of Prakash Kadam vs. Ramprasad Vishwanath Gupta is a landmark ruling in the history of India's response to the issue of fake police encounters and law enforcement's duty to be accountable. The case brought into question the abuse of police authority concerning the fundamental tenets of the constitution, such as the constitution such as the right to life and the rule of law. The Supreme Court held that fake encounters are an illegal practice and cannot be justified as legitimate policing. The Supreme Court stressed that the seriousness of the allegations was to be taken into consideration when it upheld the cancellation.

8.2 LITERATURE REVIEW

Justice Markandey Katju made a reference at the start of his judgment to a famous line from Shakespeare's Julius Caesar: "The fault, dear Brutus, is not in our stars, but in ourselves, that we are underlings." The quote indicates there is always a choice available to individuals and, therefore, one cannot simply put the blame on external circumstances for choice-based wrongdoing. In addition, the Courts expressed that members of law enforcement are unable to justify unlawful homicide due to external pressures or circumstances and are equally accountable per law as the offender who committed the unlawful act.

The doctrine of Matsyanyaya, which means "law of the fish," describes a state of chaos where the strong take advantage of the weak. This idea has its roots in ancient Indian political and legal thought, especially in texts like the Arthashastra, the Mahabharata, and the Shatapatha Brahmana.

The concept comes from early Vedic literature, such as the Shatapatha Brahmana. It notes that in times of drought, representing disorder or a lack of governance, the stronger beings overpower the weaker ones. This metaphor shows that law and order are crucial for keeping balance in society.

Kautilya, in his treatise Arthashastra, stresses the need for danda, or punishment and authority. He believes that without ways to enforce rules, society will fall into Matsyanyaya, where power decides what is just. Therefore, the ruler's role is not just about administration; it is mainly about protection—preventing exploitation and maintaining social balance.

The Mahabharata further supports this idea, especially in the Shanti Parva. The exchange between Bhishma and Yudhishtira reveals that without a ruling authority to enforce punishment, society becomes lawless. The well-known shloka compares human society to aquatic life, where larger fish eat smaller ones. This illustrates that injustice is unavoidable without governance.

References in texts like the Ramayana and other Dharmashastra writings also stress that arajaka (no ruler, and no government) or a lack of governance, leads to social chaos. Without the fear of punishment, people act only according to their self-interest, often harming others in the process.

9. CONCLUSION

The case of Prakash Kadam vs. Ramprasad Vishwanath Gupta shows the importance of evidence, fairness, and reasoning in the legal process. The court's approach clearly states that decisions cannot rely on simple claims or assumptions; they need to be based on credible, consistent, and legally acceptable proof. By carefully looking at the arguments and materials from both sides, the judgment demonstrates a balanced and methodical use of legal principles. It also stresses the importance of procedural fairness, making sure that each side gets an equal chance to present its case. On a larger scale, the case shows how the judiciary serves as a neutral mediator, resolving disputes through logic and established law instead of emotion or bias. This reinforces trust in the legal system and highlights that justice relies not only on the facts presented but also on how well they are proven and evaluated in court.

9.1 SUGGESTIONS:

1. Every death resulting from an encounter should have an independent investigation by an agency other than the local police.
2. There should be mandatory body cameras and CCTV footage to provide transparency in police operations.
3. A judicial inquiry should be conducted in all encounter killings within a set amount of time. There should be proper police guidelines set forth by the judiciary.

4. Witness protection should be strengthened, especially when the accused is a police officer.

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