



INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL
ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

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ABOUT US

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

TRANSFORMATIVE CRIMINAL LAW CASES THAT SHAPED THE INDIAN LEGAL SYSTEM: A STUDY OF LANDMARK JUDGMENTS AND THEIR IMPACT ON LEGAL REFORMS

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ABSTRACT

This research paper aims to analyse and consolidate the evolution of criminal law cases which transformed the criminal law system. By examining and consolidating these cases the paper aims to identify the legal challenges, societal implications and legal reforms in the Indian criminal justice system. There are many cases which to understand some minor laws which are unheard and undiscussed. This paper has been explaining these cases also by which a better knowledge of cases with criminal law can be given to law students and society at large. The Paper deports a quality of research, relying on primary and secondary sources including case laws, landmark case laws, statutes and academic forums. These cases have impacted on the legislature and court as they are encouraged to make changes in judgment passing by court and changes in laws to make a correct interpretation of laws in India. This research paper expected to contribute a better understanding of a complex fusion of criminal law, societal cases and legal reforms in India. Cases which impacted the Constitution has a part of this research paper. This is a paper in which various cases are taken and explained about their work and impact on laws, society and which encouraged the legislative body to make new criminal laws to make change in Indian criminal legal system. The main cases which this paper mainly focuses are Nirbhaya case, Navtej Singh Johar v. Union of India which decriminalized the homosexual acts, K.M Nanavati v. State of Maharashtra, Jugal Kishore v. State of Bihar, Shah Bano Begum v. Muhammad Ahmed Khan, Satyam scam and many other that cases that changed the legal system. This paper is here to help student and legal persons to get a easy source to get a full knowledge of cases in Criminal law in India.

KEYWORDS

Legal Systems, Criminal Law, Complex fusion, Societal Cases.

INTRODUCTION

January 26, the largest democracy of the world celebrates its 75TH republic day. As in 2022, India celebrated its 75TH year of independence where it carved out a rightful place for itself in 1947 and since then India has emerged as a prominent entity at regional as well as global levels. Current rise of India is characterised by rapid and consistent economic growth and political stability ably complimented by the timely development of its enhanced capabilities. These elements enabled India to play a decisive role at the global level by defining prominent initiatives like solar alliance, the counter-terror convention, hosting Interpol general assembly, no money for terror (NMFT) conference, permanent secretariat no money for terror, maritime order at the newly evolved strategic geography of Indo-Pacific reflects its grown capabilities. While developing its capabilities, India have embraced the growth and all-inclusive development characterised by strong focus on self-reliance. While doing so, India has always maintained and ensured its strategic autonomy that defines its overall domestic, regional, and global outreach of India. For facilitating such rapid development and reviving India into a developed economy of the world needed a transformative systemic reform. As prominent democracy of the world various systematic reforms was introduced by the government which are citizen centric and facilitating comprehensive growth in all sectors.

The researchers know that judgement Is a formal utterance of an authoritative opinion, or a formal decision given by a court. As, time is changing and moving forward, society also undergoes changes and with that need to change in the judicial system is required. To cope up with the changing nature of the society, Indian Constitution also goes through a transformation. In our country, there are some cases that have created a landmark and helped in generating new laws. Due to which not only Constitution is amended but also change the view & opinion of the people.

Criminal Law is an important and critical part of society which is has been using to protect the society and punish the wrongdoers. There have been times when lawmakers

are confused with cases. In India, the criminal justice system was primarily governed by Indian Penal Code, 1860(IPC) and now Bhartiya Nyaya Sanhita, 2023. The Indian Penal Code has gone with numerous changes from 1860 by many cases in the Indian history. The evolution of criminal law has significantly changed with landmark cases with public outcry and system flaws in India. The new criminal law has very small change which doesn't help the court with changing society. The laws have not included new crimes initiated in our society in India at large. There have been instances where the landmark cases have a significant impact on legal system and has changed the thinking of lawmakers. There are landmark cases where the law and case has been changed in a new way and sometimes a whole new law or act has been emerged due to the cause in the society and because of the judgment of the case, for example Vishaka case has made a new law the sexual harassment of women at workplace act, 2013.

With laws in India, there are times in India the government give power to court to review and struck down laws made by government. Some cases have been made on these times as well. These broad powers of constitutional review, combined with far-reaching legislation, have proved critical in the judicial enforcement of economic, social and cultural rights, which has produced a vast body of case law in the Supreme Court and the High Courts. This piece cannot traverse the entire gamut of these sources for want of space and so is confined to discussing the broad contours of the law and some of the significant decisions handed down by the Courts seeking to enforce economic and social rights in India.

The laws made by the legislature c'n be struck down by the courts, if found contrary to the provisions of the Constitution. In addition, there are a number of statutes both centre and state level, there are cases that give rise to economic, social and cultural rights in India.

Criminal justice system in India was mainly made to improve the judicial system's fairness, efficacy and efficiency. Significant attempts, amendments and adjustments has been made throughout the nation time to time to remedy the flaws in the criminal justice system. Legal foundation of these reforms is going to be explained by pertinent cases. The cases which are tried in India now and then are many times based on these landmark cases and changed the legal system. The cases which are going to be discuss in this

paper has shown a new way to think and apply laws and cases in the basis of criminal law with a emergence of law in the changed society in India.

Henceforth, the study is important for the criminal justice system to review the challenges and new implications which can help the justice system for setting new parameters in Indian criminal system with broad areas of understanding new case judgments in India.

Cases

Here are major landmark cases which transformed the laws and judicial system.

1. K.M. Nanavati v. State of Maharashtra¹

In this case the jury system was abolished. In this case, K.M Nanavati was 34 years old when his life turned upside down. He was a naval officer and married to Sylvia. He lived in Mumbai with his wife and children. In the absence of Nanavati due to loneliness Sylvia started meeting his friend Prem Ahuja and fell in love. On 27th April 1959 Sylvia confesses to her husband, that she was in love with Ahuja and also expressed her fear that Ahuja did not want to marry her. Then Nanavati went to Prem Ahuja's house to ask whether he wanted to marry Sylvia and take care of the children, but he refused. In anger Nanavati shot 3 bullets in his body, and he died.²

The judgment, owing to Nanavati's high-profile funding, the jury pronounced him 'not guilty' by an eight is to one majority—a decision which was found perverse and overruled by the Judge. Following this controversial decision, the case was sent to the Bombay High Court, who overturned the jury's decision and held that the accused was guilty of murder under section 302 of the Indian Penal Code, thereby sentencing him to life imprisonment. The Supreme Court ultimately upheld this final verdict. He got out of the Prison three years later. The case proved that an influenced panel of jury could be dangerous, as it abolished the jury system.

As a result of this controversial case, India's jury system was completely abolished, and was removed from the Code of Criminal Procedure, 1973. This forever transformed the

¹ CRIMINAL JUSTICE REFORMS IN INDIA: TRANSFORMING THE LEGAL LANDSCAPE

"<https://www.legalmantra.net/>"

² 7 Landmark Cases In India That Gave Birth To New Laws "<https://homegrown.co.in/homegrown-explore/7-landmark-cases-in-india-that-gave-birth-to-new-laws>"

mechanism by which law and order would be delivered in India. In another landmark change, as the crux of the case deeply impacted public perception, it brought the commencement of media trials in the judicial system, something we're all too familiar with today.

2. Shah Bano Begum v. Mohammad Ahmad Khan ³

Shah Bano was mother of five children and at the age of 62 she was divorced by her husband in 1978. She went to Supreme Court for seeking maintenance for her husband who has divorced him. She claimed for alimony which was against the Islamic culture. The government ruled in favour of her husband. But, in keeping her old age and health in mind Supreme Court order was in favour of Shah Bano. It maintained secular and welfare of women. Which amended section 125 of the Criminal Procedure Code.

3. Tuka Ram v. State of Maharashtra (Mathura rape case)⁴

A coldly night on 26th March 1972 a minor tribal girl named Mathura was summoned by the police station at night regarding a case filed by her brother against her boyfriend that he has kidnapped her. Taking advantage of the situation two police constables threatened her into submission, raped and then let her go. After this incident, Mathura filed a rape case against the two police constables. The case went to Supreme Court and the Court ruled in favour of the police constables on the ground that there were no sign of struggle and Mathura did not even shout for help.

After this case in the unjust judgment by the Supreme Court, a huge wave of wrath by the public was triggered, which ultimately led to the amendment of the Criminal Law Act, 1983. Now, custodial rape and the procedure to deal with 'consent' has been included under rape laws of India.

4. Rajagopal v. State of Tamil Nadu⁵

This incident start with a prisoner convicted of murder. A prisoner convicted of murder authors an autobiography recounting the events of the crime, explicitly detailing the

³ Mohd. Ahmed Khan vs Shah Bano Begum And Ors on 23 April 1985 1985 AIR 945, 1985 SCR (3) 844
“<https://indiankanoon.org/doc/823221>”

⁴ Tuka Ram And Anr vs State Of Maharashtra on 15 September, 1978, 1979 AIR 185 “ 7 Landmark Cases In India That Gave Birth To New Laws “<https://homegrown.co.in/homegrown-explore/7-landmark-cases-in-india-that-gave-birth-to-new-laws>”

⁵ R. Rajagopal vs State Of T.N on 7 October, 1994, 1995 AIR 264, 1994 SCC (6) 632, “

alleged involvement of police officials. Seeking justice, he approaches the editor and associate editor of a weekly magazine in Madras, requesting them to publish his account.

As the media house prepares for publication, public officials—concerned about their purported connection to the case—intervene and have members of the editorial team arrested. In response, the media team, now petitioners, move the court, seeking an order to prevent state authorities from obstructing the publication of the prisoner's autobiography.

5. Navtej Singh Johar vs. Union of India (2018): Decriminalizing Homosexuality⁶

In a groundbreaking decision, the court decriminalized consensual homosexual relationships by striking down Section 377 of the IPC, recognizing the right to love and sexual autonomy. This judgment was a monumental victory for LGBTQ+ rights and human dignity in India.

6. Vishaka v. State of Rajasthan⁷

Bhanwari Devi, a social worker from a village in Rajasthan, faced brutal retaliation in the form of gang rape after she attempted to prevent a child marriage by advising a family against marrying off their one-year-old daughter. Despite her efforts to seek justice, her case was met with apathy and neglect by police officials and the lower judiciary, exposing systemic insensitivity toward victims of sexual violence.

Outraged by the institutional indifference, numerous women's rights groups and NGOs rallied around her case. Although they could not secure justice for Bhanwari Devi directly, their collective mobilization led to a broader movement advocating for women's rights. This eventually culminated in a landmark petition addressing the need for legal safeguards against sexual harassment in the workplace, laying the groundwork for transformative legal reform across India.

In response to the widespread outrage and mobilization sparked by Bhanwari Devi's case, the Supreme Court of India delivered a landmark judgment addressing the issue of sexual harassment at the workplace. Recognizing the urgent need to safeguard

⁶ Navtej Singh Johar vs Union of India Ministry of Law And ... on 6 September 2018

⁷ Vishaka & Ors vs State of Rajasthan & Ors on 13 August 1997, AIR 1997 SUPREME COURT 3011, 1997 AIR SCW 3043

women's rights and uphold gender equality, the Court laid down comprehensive guidelines aimed at preventing sexual harassment and ensuring a safe working environment for women.

These guidelines placed a clear responsibility on employers to actively prevent instances of harassment and to establish effective mechanisms for the redressal of complaints within the workplace. This judgment marked a pivotal step toward eliminating gender-based discrimination and fostering dignity and safety for women in professional spaces across the country.

This case has made new law in India which has given protection to women in workplace. The guidelines given by the Supreme Court are the backbone of the act.

The new law made by Vishaka Guideline name is "The Sexual Harassment of Women at Workplace (PREVENTION, PROHIBITION AND REDRESSAL) Act, 2013"

7. Jugal Kishore v. State of Bihar⁸

Jugal Kishore Prasad, a young man under the age of 21, was convicted of a serious criminal offense—murder. The trial court sentenced him to life imprisonment under the Indian Penal Code (IPC).

However, his legal team invoked the Probation of Offenders Act, 1958, specifically Section 6, which deals with offenders under 21 years of age, and requested that he be released on probation instead of being sent to jail.

This case made changes to the new law and a new law was propounded as Probation of Offenders Act.

This section mandates that if a person below 21 years of age is found guilty of an offense not punishable with life imprisonment or death, the court shall not sentence them to imprisonment unless it is satisfied that probation is not desirable.

In short, for people under 21, the law favours probation unless the crime is very serious.

8. People's Union for Civil Liberties (PUCL) v. Union of India⁹

The Legal Services Authorities Act, 1987, established legal aid bodies at various levels to provide free legal services to those in need. The plight of undertrial prisoners, leading to the landmark judgment that emphasized the right to legal aid as an essential element

⁸ Jugal Kishore Prasad vs State Of Bihar on 16 August, 1972 1972 AIR 2522

⁹ criminal justice reforms in india: transforming the legal landscape "https://www.legalmantra.net/blog-detail/criminal-justice-reforms-in-india"

of a fair trial.

The Supreme Court directed the government to ensure the effective implementation of legal aid schemes and uphold the right to access justice for all.

9. Mukesh & Anr vs State for Nct Of Delhi & Ors (Nirbhaya case)¹⁰

On the cold evening of December 16, 2012, a 23-year-old para-medical student and her male friend visited PVR Select City Walk Mall in Saket, Delhi, to watch a movie. Later that night, while attempting to return home, they boarded a private bus at the Munirka bus stand, unaware that it was being operated illegally by six men. Once inside, the young woman became the victim of a brutal and inhumane gang rape and physical assault at the hands of those six accused. Her male companion was also violently attacked and restrained. The perpetrators exhibited extreme sexual perversion, cruelty, and complete disregard for human dignity, assaulting the woman in a manner that led to severe internal injuries and trauma.

Following the assault, the victims were thrown out of the moving bus onto the roadside. Despite receiving extensive medical treatment, including being transferred to a hospital in Singapore, the young woman succumbed to her injuries on December 29, 2012.

This incident shocked the conscience of the nation and the world, leading to widespread protests, public outcry, and significant discussions on women's safety, criminal justice reforms, and the urgency of stricter laws on sexual violence.

Fast-Track Court (2013): All adult accused were found guilty and sentenced to death.

Delhi High Court (2014): Upheld the trial court's conviction and death penalty.

Supreme Court (2017): Confirmed death penalty in a detailed judgment citing the "rarest of rare" doctrine.

Review and Curative Petitions: Rejected by the Supreme Court.

Mercy Petitions: Filed by convicts to the President under Article 72; all were rejected.

Judgement

The Supreme Court, in 2017, upheld the death sentence awarded to the four adult convicts, observing that:

"The crime was not only heinous but had shocked the collective conscience of society.

¹⁰ Mukesh & Anr vs State For Nct Of Delhi & Ors on 5 May, 2017 AIR 2017 SUPREME COURT 2161 "<https://indiankanoon.org/doc/68696327/>"

The brutality meted out to the victim was unparalleled, and the act of the accused reflected extreme depravity and perversion.”

Execution of Convicts:

On March 20, 2020, the four convicted adults—Mukesh, Akshay, Vinay, and Pawan—were executed at Tihar Jail, after exhausting all legal remedies.

Juvenile Accused:

The juvenile offender was tried under the Juvenile Justice Act and sentenced to three years in a reform home, the maximum permissible under the law at the time.

Led to nationwide protests and global outrage. Resulted in the formation of the Justice Verma Committee, which recommended major reforms in criminal law relating to sexual offenses.

The Criminal Law (Amendment) Act, 2013 was passed, introducing stricter punishments for rape and sexual offenses. Sparked discussions on the juvenile justice system and fast-tracking trials in sexual violence cases.

Judgment

The Supreme Court ruled in favour of the publication, emphasizing the fundamental right to freedom of expression and the right to privacy. It reaffirmed the vital role of the press as the fourth estate in a democratic society, ensuring transparency and accountability in governance. The Court further held that public officials could seek damages only if they could prove that the published content was false and misleading, thereby safeguarding the press from unwarranted state interference.

1. Sidhartha Vashisht @ Manu Sharma vs State (NCT Of Delhi) (Jessica Lal Murder case)¹¹

On night of 29th to 30th April 1999, Manu and his friends arrived and asked for drinks. Bartenders in charge Jessica Lal and other bartender declined to serve alcohol because the party had ended, Jessica and Malini also tried to make them understand that they didn't have any liquor. As Jessica refused to serve the booze, he pulled out a 22 calibre” P. Berretta pistol and fired one at the roof and another at Jessica Lal, she passed out due

¹¹ Sidhartha Vashisht @ Manu Sharma vs State (Nct of Delhi) on 19 April 2010 “

to that. Beena Ramani who was also present at the crime scene questioned Manu as to why he fired the gun on Jessica as well as asked him to surrender his gun. But Manu and his friends fled from the crime scene.

The lower court Acquitted Manu Sharma having all the evidence and Witnesses.

The Apex Court approved the sentences in the Jessica Lal murder case on 19th April 2010. Court has observed that the evidence, witness testimonies, and evidence related to vehicles and cartridges have proved his guilt beyond a reasonable doubt. It was also analysed that the decision of the high court was justified. The Hon'ble Supreme Court has accepted that trial by media has been a component, but it has not influenced the court's judgment. It shows the speedy trial is possible.

Conclusion: A Call for Judicial Evolution

In conclusion, while India's legal system boasts a strong constitutional foundation, its judicial processes continue to be plagued by colonial-era inefficiencies, procedural delays, lack of transparency, and limited accessibility. However, with growing public awareness, increasing judicial activism, and pressure from civil society, the demand for reform has never been stronger.

The Indian judiciary must embrace structural changes, technological advancements, and greater accountability mechanisms to ensure that justice is delivered in a timely, transparent, and efficient manner. By addressing these systemic challenges and fostering an environment that prioritizes judicial efficiency, legal modernization, and citizen-centric justice, India can pave the way for a truly progressive and equitable legal system in the years to come.

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