REPORTABLE

IN THE SUPREME COURT OF INDIA

CRIMINAL APPELLATE JURISDICTION

GURSHARAN SINGH V. STATE OF PUNJAB (2022)

BENCH: Mr. Justice Uday Umesh Lalit, Mr. Justice S. Ravindra Bhat & Mr. Justice P.S. Narasimha

DECIDED: April 18, 2022

RATIO DECIDENDI & PRECEDENTIAL CRUX:

In circumstantial evidence cases, the chain of circumstances must be complete, pointing unerringly to guilt and excluding every hypothesis of innocence.

1. Factual Matrix & Background:

The appellant was convicted of murder based on circumstantial evidence including motive and recovery of a weapon. The High Court affirmed the conviction. The appellant argued before the Supreme Court that the prosecution failed to prove an unbroken chain of circumstances.

2. Substantive Legal Questions Framed:

Whether circumstantial evidence that leaves gaps in the chain and admits of a reasonable hypothesis of innocence can sustain a conviction for murder.

3. Analysis & Ratio Decidendi:

The Supreme Court acquitted the appellant, reiterating the five golden principles (Panchsheel) of circumstantial evidence. The circumstances from which the conclusion of guilt is drawn must be fully established. The facts proved must be consistent only with the guilt of the accused and incapable of explanation on any other hypothesis. Suspicion, however strong, cannot take the place of legal proof.

4. Principles Enunciated:

- 1. Circumstances must be cogently and firmly established by independent proof.
- 2. The chain of evidence must be so complete as not to leave any reasonable doubt.
- 3. Grave suspicion cannot substitute for legal proof in capital trials.

5. Practical Litigation Implications:

- In circumstantial murder trials, attack every single link in the chain—motive, last seen, recovery, forensic analysis—to demonstrate alternative plausible explanations.

.....J.
[SUPREME COURT BENCH]