
PSYCHE UNVEILED: RETHINKING THE INSANITY DEFENCE FOR SERIAL ENIGMAS IN THE LEGAL LABYRINTH

Tarika Mittal, Symbiosis Law School, Pune

ABSTRACT

This research delves into the nexus of mental health, criminal law, and societal perceptions, particularly focusing on the legal defense of insanity for serial killers in the context of the Indian legal system. Despite the increasing global awareness of mental health issues, India's legal system still has untapped potential. “*The Indian Penal Code, 1860, Section 84*”¹ (Now, *Sec. 22, The Bhartiya Nyaya Sanhita, 2023*)², offers a defense based on "unsound mind," which states that an offense is not committed if the person was unable to understand the nature of the act or its wrongfulness due to unsoundness or insanity. However, a thorough understanding of the complex circumstances underlying such behavior is hampered by the restricted interpretation of this rule.

By considering psychological, sociological, and environmental aspects that affect one's mental state and contribute to significant crimes, the research aims to expand the definition of "insanity" beyond its legal limitations. Addressing the current gap in understanding the psychological and socio-environmental causes of serial killers' acts is a key problem. The goal of the research is to offer a fresh viewpoint on the defense of insanity for serial killers by examining the literature, individual instances, and insights from the Law Commission of India and medical authorities.

Keywords: Criminal, Impulse, Insanity, Law Commission, Legal, Medical, Mental disorder, Penal, Psychological, Reforms, Serial Killers, Socio-environmental, Urge.

¹ The Indian Penal Code, 1860, § 84, Act no. 45, Act of Parliament, (1860)

² The Bhartiya Nyaya Sanhita, 2023, § 22, Act no. 45, Act of Parliament, (2023).

Introduction

Long shrouded in neglect, mental health in India is a silent narrative. In epochs past, the mentally vulnerable found themselves incarcerated, banished from societal embrace. Unveiling this historical tapestry is paramount for crafting a more enlightened discourse on the tapestry of mental well-being. However, there is a substantial portion of this issue in the legal sphere that has not been discussed yet. A person can defend himself on the ground of “*unsound mind*” as per “**Section 84 of the Indian Penal Code, 1860, (Now, Sec. 22, The Bhartiya Nyaya Sanhita, 2023)**³ which says: *If at the time of commission of the offense, (i) the person was not capable of knowing the nature of offense or (ii) oblivion of the fact that he is doing a wrongful act or against the law, by reason of unsoundness or insanity, is not an offense.*”⁴ In this manner, Indian legal system emphasizes legal insanity over medical insanity.⁵ But are these grounds sufficient enough to call someone an insane or of unsound mind? Can there be other elements contributing to one’s unsound behaviour or a queer one, oppressing someone to be recalcitrant towards oneself? The answer to this seems to have been obstructed by a restricted approach to this issue due to “**Judiciary’s literal rule of interpretation**”⁶ under this statute.

Moreover, a major contention by the author in this article is towards *legitimate grounds for “serial killers” to get diminished punishment in certain circumstances*. “Although this term was coined in 1930, it has no specific definition yet. Typically, a serial killer is someone who has *killed three or more people over the course of more than a month*, with a break in between the killings, and whose primary motive for doing so is psychological fulfillment.”⁷ ***The fact that the serial killers are always seen as dreaded criminals, overlooking their psychological and socio-environmental factors is an unidentified legal lacuna.***

Hence, an attempt will be made by the author to shed some light on this issue and how Indian judiciary has always been restricted to its approach in this field of legal defense. The research will

³ The Bhartiya Nyaya Sanhita, 2023, § 22, Act no. 45, Act of Parliament, (2023).

⁴ The Indian Penal Code, 1860, § 84, Act no. 45, Act of Parliament, (1860).

⁵ Prof. K.D. Gaur, Textbook on Indian Penal Code, Universal LexisNexis, 3.9 Unsoundness of Mind, (2020-2021)

⁶ J.L.W., Literal Interpretation of Statutes, the Modern law Review, Vol.14, No. 3, Pg. 333-334, (1951).

⁷ Mamta Patel, Serial Killer: Elderly Victims of Serial Killers, Vol. 8, No. 2, IJCST, Pg.2, (2015). (1-11)

be centered around new opportunities for serial killers to get diminished punishments along with their post-conviction treatment to overcome their respective mental disorderliness.

Statement of problem

The author would like to discuss the implications of “Insanity as a defense on serial killers.” The need for such a step to be taken by the authorities and its impact on the entire society at large. The major contention here is about expanding the field of word “insanity” from legal one to incorporating other factors affecting one’s mental construction that in turn results in serious crimes in society. It focuses on several psychological backing, along with further interpreting the terminology of insanity as a ground for defense, taking into picture the suggestion of “the **Law Commission of India** ”⁸ and other medical authorities in this field, ultimately adding a new perspective.

Research Objectives

- (i) To analyze various literature ever presented on the issue of “serial killers and their psyche” & “Insanity as a defense” by discussing some specific cases of “Serial Killers.”
- (ii) To relate medical insanity with legal insanity and discover new criteria i.e., Psychopathy *et al* in this field.
- (iii) To identify certain overlooked lacunae by the judiciary in this field *in situ*.
- (iv) To compare the concept of insanity among various countries throughout the world, mainly India, USA & U.K. and renowned cases in this field.
- (v) To conclude the research by keeping forward certain reforms in application of Sec. 84 of the Indian Penal Code, 1860 with a view to inculcating other factors under “insanity”.

Research Issues (Hypothesis)

- (i) Why are social and other environmental factors affecting the person’s psyche not considered

⁸ The Law Commission of India, April 2018, Report No. 42, Indian Penal Code, 1971.

while penalizing serial killers with severe punishment?

(ii) Why only legal insanity and secondarily, medical insanity are taken into account overlooking psychological traits while punishing serial killers?

(iii) Why can't "**an uncontrollable urge to do something**"⁹ be considered when punishing someone?

(iv) Why instead of providing mental health treatment, "serial killers" are treated like dreaded criminals?

Research Methodology and Tools

Research Methodology:

(i) **Doctrinally:** Analyzes statutory provisions and precedents *in situ*, and utilizes reasoning power to interpret whatever is being pronounced and written earlier in this field.

(ii) **Empirical Qualitative:** The author draws personal observations in this research and reflects her own views on the prevailing issues after reviewing the progress being made in this field.

(iii) **Descriptive:** The article discusses the consistency in the pattern of judgment being made related to this area of serial killers and the reason behind it.

(iv) **Analytical:** Article aims to assess the available data and information pertinent to the topic and identify the causes and consequences (if changes made) of the issue at hand.

(v) **Conclusive:** The article identifies research objectives and verifies the findings of study in this field to bring it to a definite conclusion.

(vi) **Secondary Research:** This article compiles the data from already existing written sources and identifies and defines the research topic in its own way and ultimately analyzes the data.

⁹ The Nithari case, Criminal Appeal No (S). 2227 Of 2010.

Research tools:

(i) Google Scholar, (ii) JSTOR, (iii) SCC Online, (iv) LexisNexis, (v) Manupatra,

(vi) Hein Online

Literature Review

Sr. No.	Author	Title	Tools/ Methods	Key findings	Research Gaps /Use of Literature
1.	Priya Sepaha	Psychopaths: An Unrevealed Area in Judicial System ¹⁰	Legal Cases interpretation s, doctrinal, and non-empirical approach	<p>(i) Inadequate treatment for criminals being victims of their own minds results from the system's lack of knowledge and comprehension of mental illnesses, especially psychopathy.</p> <p>(ii) The criminal justice system should consult psychologists and employ practices to cater to the distinctive requirements of psychopathic criminals.</p>	<p>(i) Does not include a thorough analysis of the restrictions placed on the research that was done.</p> <p>(ii) It does not address any potential biases or restrictions in the methodology or data gathering.</p>

¹⁰ Priya Sepaha, Psychopaths: An Unrevealed Area in Judicial System, 4.1 NULJ 1. 2014

2.	James Alan Fox and Jack Levin	“Multiple Homicide: Patterns of Serial and Mass Murder” ¹¹	Non-empirical approach with detailed comparison analysis drawn among judicial precedents.	(i) The paper discusses the behaviour and characteristics of female serial killers, highlighting the lack of knowledge regarding whether the model of fantasy drive behaviour derived from interviews with male serial killers can be applied to females.	(i) Acknowledges that the model of fantasy drive behaviour may not be applicable to female serial killers, depicting the lack of knowledge here. (ii) There is limited research available on female serial killers, indicating a gap in understanding their characteristics and motivations.
3.	Jan Scott	Serial Homicide: We Need to Explore Behind the Stereotypes and Ask Why ¹²	Descriptive and Comparative Research	(i) Doesn't offer a thorough examination of how society reacted to the "feeble-minded" monster and how it differed from other horror movies of the era. (ii) The probable ethical and moral ramifications of the eugenic solution put forth by the film's protagonist are not discussed in this essay.	(i) The larger cultural and historical context in which the movie was created and viewed is not covered in the paper, although this information might shed more light on societal perceptions of justice and mob violence.

¹¹James Alan Fox and Jack Levin, Multiple Homicide: Patterns of Serial and Mass Murder, Crime and Justice, 1998, Vol. 23 (1998), pp. 420.

¹² Jan Scott, Serial Homicide: We Need to Explore Behind the Stereotypes and Ask Why, British Medical Journal, Jan. 6, 1996, Vol. 312, No. 7022 (Jan. 6, 1996), pp. 2-3.

4.	Russell D. Covey	Criminal Madness: Cultural Iconography and Insanity ¹³	Non-empirical, Doctrinal, and comparative approach	(i)The abstract of the paper acknowledges the assistance of a colleague in providing helpful sources of information regarding "born criminals".	(i) The study makes no mention of its own shortcomings in any detail. (ii)The references offered don't specifically address the paper's weaknesses.
5.	James Alan Fox and Jack Levin	Multiple Homicide: Patterns of Serial and Mass Murder ¹⁴	Doctrinal and Non-Empirical approach.	(i) Addresses several types of homicide, such as mass, and serial killings, and places more emphasis on the motivational commonalities. (ii) Draws attention to the inadequacies of behavioural profiling in reliably identifying structured or disorganized crime scenes.	(i)The reliability of behavioural profiling in classifying crime scenes as organized or disorganized is limited, with a low rate of success in leading to the identity of a killer.

Critical Analysis

“I still have an urge to kill.”¹⁵

The aforementioned-statement was said by **Surendra Koli**, the convict of the renowned “Nithari

¹³ Russell D. Covey, Criminal Madness: Cultural Iconography and Insanity, Stanford Law Review, Apr., 2009, Vol. 61, No. 6, Symposium: Media, Justice, and the Law (Apr., 2009), pp. 1375-1380.

¹⁴ James Alan Fox and Jack Levin, Multiple Homicide: Patterns of Serial and Mass Murder, Crime and Justice, 1998, Vol. 23 (1998), pp. 407-455.

¹⁵ Psychopaths: An Unrevealed Area in Indian Judicial System, Pg. 14.

case”¹⁶ after he was sent to jail. The case was considered as “the rarest of rare case” as a total of 51 victims were involved here. And the accused who used to kill juvenile girls and later ate them after raping, was sentenced death penalty under “Sec. 302”¹⁷ (Now, Sec. 101 of The Bhartiya Nyaya Sanhita, 2023)¹⁸ and “Sec. 376 of IPC”¹⁹ (Now, Sec. 64 of The Bhartiya Nyaya Sanhita, 2023).²⁰

But isn’t “unsoundness of mind” an exception to commission of any illegal offence in India as per “Sec. 84 of IPC”?²¹ (Now, Sec. 22, The Bhartiya Nyaya Sanhita, 2023)²² The statement he said, itself depicts some uncontrollable mental element of his mind, even after being harshly punished for an offence. **The answer lies in the fact that Indian Judiciary hardly considers the concept of “psychopathic behaviour” in criminal justice system.** “But the judicial system shall not take factual ignorance for granted; even while it is not criminal under the IPC, ignorance of the law resulting from factual ignorance must be penalized, and our current judicial system has to be reformed.”²³ (However, both Surendra Kohli and Moninder Singh Pandher were acquitted by the Allahabad High Court in 2023 citing “Lack of Evidence”)²⁴.

The Shallow approach to “Legal Insanity”

It is said, “The individualized nature of the murders under serial killing is among their most frightening features.” Even while most serial killers suffer from significant personality dysfunction, this does not fully account for their actions. “Burgess et al. propose that serial killers frequently have a private inner world of violent thoughts and fantasies, disrupted early bonds, and formative traumatic experiences based on information from interviews.”²⁵ Due to these factors, the person becomes alienated, busy, and unaware of the behavioural restrictions that are socially acceptable. Studies on male sexual killers and sadistic criminals provide evidence in favour of this

¹⁶ Nithari Case, Criminal Appeal No (S). 2227 Of 2010.

¹⁷ The Indian Penal Code, § 302, Act no. 45, Act of Parliament, 1860.

¹⁸ The Bhartiya Nyaya Sanhita, 2023, § 101, Act no. 45, Act of Parliament, (2023).

¹⁹ The Indian Penal Code, § 376, Act no. 45, Act of Parliament, 1860.

²⁰ The Bhartiya Nyaya Sanhita, 2023, § 64, Act no. 45, Act of Parliament, (2023).

²¹ The Indian Penal Code, § 84, Act no. 45, Act of Parliament, 1860.

²² The Bhartiya Nyaya Sanhita, 2023, § 22, Act no. 45, Act of Parliament, (2023).

²³ Psychopaths: An Unrevealed Area in Indian Judicial System, Pg. 15.

²⁴ Nithari killings: Who is Surendra Koli? A recap of chilling case | Latest News India - Hindustan Times

²⁵ Burgess A, Hartman C, Ressler R, Douglas J, McCormack A. Sexual homicide: a motivational? model. Journal of Interpersonal Violence 1986; 1:251-7.

concept. Therefore, there is a need to add further grounds to claim the defence of “unsound mind” that might later lead to reformation in such people’s life.

Although, “*the Law Commission of India in its 42nd report*”²⁶ suggested that there required no improvement in “*Sec. 84 of IPC*”²⁷ (Now, *Sec. 22, The Bhartiya Nyaya Sanhita, 2023*)²⁸, it is humbly contented that the Commission shall again refer to the detailed substance of certain psychopathic cases and try inculcate some new grounds in this section by establishing some authority to work upon it.

Even though reference to “*Wild Best Test*”²⁹ and “*Insane Delusion Test*” are identified in landmark common law cases like “*Hadfield case*”³⁰, to identity the insanity in a person, the concept of “**Diminished Responsibility**” as recognised by U.K., shall also be accepted by Indian criminal justice system that can be used as partial defence for a psychopath in a murder case³¹.

Dreaded Criminals or Helpless people?

In maximum Indian scenarios, serial killers are compared to monstrous people. But the judiciary might overlook the fact that apart from other psychological and social factors, there might be some other mental factors that would lead those killers uncontrolled, even when they know the nature of the act as well as the crime that they are doing. For example: as per “**RATIONAL CHOICE THEORY**”³², an individual makes logical choices about under what circumstances to commit crime, but a huge part of such choices is “**Hedonistic Calculus,**” that includes weighing the probability of pain and pleasure derived from such act, and this is what a serial killer seeks. But what if, he is not in his own control?

²⁶ The Law Commission of India, April 2018, Report No. 42, Indian Penal Code, 1971.

²⁷ The Indian Penal Code, § 84, Act no. 45, Act of Parliament, 1860.

²⁸ The Bhartiya Nyaya Sanhita, 2023, § 22, Act no. 45, Act of Parliament, (2023).

²⁹ R v. Arnold, (1724) 16 St. Tr. 695.

³⁰ Hadfield Case, (1800) 27 St. Tr.128.

³¹ Rajat Shandilya & Roman Khan, Detailed Analysis of Section 84 of Indian Penal Code, 1860, JLSR, Vol. 6, Issue 5, Pg. 111.

³² THE RATIONAL CHOICE THEORY BY ADAM SMITH.

“Irresistible impulse” as per **“Ganesh v. Shravan”**³³ cannot be pleaded as ground for insanity as it overrules the importance of motive in that case. There must also be some other elements as per the judiciary to claim for insanity.

But the bone of contention here is, **“Why to punish someone for something that he doesn’t have control over?”** That would be completely unfair to such person. However, punishment for him would mean nothing but an extra impediment in his entangled life. India’s youngest serial killer, **“Amardeep Sada,”** who had killed 3 children just at the age of 8, was under similar state of mind, when asked what made him to such crime, **“He just smiled.”**³⁴

Hence, instead of simply believing them as dreaded criminals after just listening to the number of cases against them, their mental psyche shall be considered.

Paucity of Special Legislation

“Mc Naughten’s case”³⁵ that gave “5 check points” for a person to be considered of “unsound mind” at the time of commission of offence along with **“Sec. 84 of IPC”**³⁶ (Now, **Sec. 22, The Bhartiya Nyaya Sanhita, 2023**)³⁷, have been the foundation of criminal defence for “unsound mind”. Although several other statutes like **“Sec. 5”**³⁸ & **“Sec. 13 of HMA, 1955”**³⁹ and **“Indian Evidence Act”**⁴⁰ contain provision related to psychopath. **“The Chapter XXV od CrPC”**⁴¹ (Now, **Chapter XXVII of The Bhartiya Nagarik Suraksha Sanhita, 2023**)⁴² also puts forth provision for trial of insane people. However, Mc. Naughten, since it does not offer protection against behaviour arising from mental disorder, partial hallucination, irresistible need, or obsessive behaviour of a psychopath, has been challenged as being outdated. By and large, none of these regulations are sufficient to address the issue of psychopaths.

³³ Ganesh v. Shravan, (1969) 71 Bom. L.R. 643.

³⁴ Amardeep Sada v St. of Bihar, 2014.

³⁵ Mc. Naughten Case, 8 ER 718.

³⁶ The Indian Penal Code, § 84, Act no. 45, Act of Parliament, 1860.

³⁷ The Bhartiya Nyaya Sanhita, 2023, § 22, Act no. 45, Act of Parliament, (2023).

³⁸ The Hindu Marriage Act, 1955, §5, Act no. 25, Act of Parliament, 1955.

³⁹ The Hindu Marriage Act, 1955, §13, Act no. 25, Act of Parliament, 1955.

⁴⁰ The Indian Evidence Act, Act no. 1, Act of Parliament, 1872.

⁴¹ The Criminal Procedure Code, Act no. 2, Act of Parliament, 1974.

⁴² The Bhartiya Nagarik Suraksha Sanhita, 2023, Act no. 46, Act of Parliament, (2023).

According to protocol, practically every criminal is put through a clinical evaluation and, in some situations, a mental evaluation. The issue with psychopaths is that they appear to be trial-ready. For instance, Surendra Koli did feel an urge to kill someone even after being punished, then what was the productive ramification of that punishment? In addition, Indian courts emphasize the necessity for a more progressive approach to the administration of the law pertaining to psychopathic behaviour. It is to be brought to notice that such behaviour shall be urgently identified and shall be subject to certain other medical tests such as “Narco-Analysis test” to prevent such people go farther behind their uncontrollable desires and shall be subject to certain mental treatment.

Laws to recognize and appropriately deal with psychopaths have previously also been drafted in the **United Kingdom** and the **United States of America** where they are not only able to identify psychopaths but also are able to treat them. India shall also follow such laws in order to simplify such cases.

The Bottom Line

The publication of “**Nithari Judgement**”⁴³ in newspapers astonished many, as there was zero mention of accused’s disease i.e., “psychopathy” in report by judiciary and hence, he was given death punishment. This is a significant legal gap, that one can find not only in many other such cases like “**Auto Shankar case**”⁴⁴ *et al*, that our judicial system should fill by making psychopath conduct a crucial component of the inquiry and the administration of justice.

The line separating psychopathy from some other types of crimes is tenuous, to say the least. In order to remove any doubt about this matter in the eyes of the general people, the judiciary and legislature must create and adopt a special legislation for this type of mental disorder which is ironically nothing in their eyes, but a monstrous behaviour. Either they shall be subjected to punishment only based on homicide under “**Sec. 304 of IPC**”⁴⁵ (*Now, Sec. 103, The Bhartiya*

⁴³ Nithari Case, Criminal Appeal No (S). 2227 Of 2010.

⁴⁴ Auto Shankar Case, AIR 1995 264.

⁴⁵ The Indian Penal Code, § 304, Act no. 45, Act of Parliament, 1860.

Nyaya Sanhita, 2023)⁴⁶ along with some medical help or shall be completely absolved in special cases and sent for requisite mental treatment as in **USA and UK**.

If such steps are not taken, that would apparently be against “*Article 12 of the CRPD (equal recognition before the law)*”⁴⁷ that was a key element on which numerous struggles occurred while framing this convention⁴⁸ as such people won’t be at par with people who are considered insane and nor with the sane people. Moreover, rehabilitation centres shall take on the role of great helpers, applying “*Article 21 of the Constitution*”⁴⁹ to preserve such convicts’ **Right to Life and Personal Liberty**. After all, the criminal justice is all about reforming society, hence medical help shall be a priority rather than just punishing someone in proportion to what one did.

*Ultimately, one should remember, this is the most predominant need of an hour, which if keeps persistent to be overlooked would result in many juvenile children like Amardeep Sada (serial killer), who would say nothing but smile*⁵⁰!!

⁴⁶ The Bhartiya Nyaya Sanhita, 2023, § 103, Act no. 45, Act of Parliament, (2023).

⁴⁷ United Nations Convention on the Rights of Persons with Disabilities, Art. 21, 2006.

⁴⁸ Bhargavi V. Davar, Economic and Political Weekly, Vol. 47, Issue 52, 2012, Pg. 123-131.

⁴⁹ The Constitution of India, Art. 21, Act of Parliament, 1950.

⁵⁰ 8-year-old boy from Bihar is 'World's youngest serial killer,' say reports- The New Indian Express

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