
CASE ANALYSIS: DASHRATH PATRA V. STATE OF CHHATTISGARH, 2025

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ABSTRACT

When should the benefit of the doubt be given to the accused? Or are circumstances enough to prove the insanity of someone? How to evaluate the erratic behaviour of someone? What to prove in court: legal insanity or medical insanity, does legal insanity require a complete mental apprehension, or is it subject to certain parameters? . In the case of Dashrath Patra v. State of Chhattisgarh (2025) Supreme Court revolved around Section 84 of the Indian Penal Code 1850 and Article 21 of the Constitution of India¹. A certain set of questions with uncertain answers that can only be addressed with an accurate comprehension of the case, and lets us understand the case analysis with precise findings.

Keywords: Unsoundness of mind, insanity defence, Reasonable doubt, Article 21, Burden of proof, section 84 of IPC.

¹ INDIA CONST. ar. 21

Introduction

Cambridge dictionary defines the word “insanity” as “*the condition of being very annoyed, angry, upset, or excited, often so that you cannot think or behave normally*”² And according to the Oxford Learner’s Dictionary, the word “insanity” meaning lays down as “*a state of being insane*”³. The general understanding of insanity is outlined as a person who is unable to understand the circumstances, surrounding facts or consequences due to their mental apprehension and unseasoned state. Holding them criminally liable is questionable. Although criminal acts are based on the two elements, one is Actus reus, and the other is mens rea. Even so, the presence of these two elements often protects those who are cognitively impaired and have done an act without criminal intent and a lack of knowledge. The Bhartiya Nyaya Sanhita serves justice, eliminates all forms of discrimination and ensures fairness through an effective justice system. Bhartiya Nyaya Sanhita acknowledges certain situations in which a criminal act is deemed lawful or excusable owing to a lack of criminal intent, compulsion or mental incapacity. Mental incapacity is one of the exemptions in which criminal acts are reasonable and justified.⁴ Section 22 of the Bhartiya Nyaya Sanhita explains the act of an unsound mind as “*Nothing is an offence which is done by a person who, at the time of doing it, by reason of unsoundness of mind, is incapable of knowing the nature of the act, or that he is doing what is either wrong or contrary to law.*”⁵

The concept of insanity originated from the case ***R v Arnold*** (1724) in which the mental capacity of the accused, whether he can understand the course of action and can distinguish between good and bad, was established through the “wild beast test”.⁶ Another case, ***R v Hadfield (1800)***, also known as the “insane delusion test”, was introduced to serve the same purpose, but unfortunately, it turned out to be unreliable and not so useful to examine the mental incapacity of someone.⁷ One of the notable cases is named ***R v McNaughton***, which sets the principle of “Right and wrong” and also firmly recognized insanity as a legal defence. Thereafter, it was known as McNaughton’s Rule.⁸ These rules are as follows:

“1. All are presumed to be sane, until contrary be proved for the satisfaction of the Court.

² Cambridge dictionary, <https://share.google/UpYeb5ARxuuch9LaH> (Last visited 12th August)

³ Oxford Learner’s Dictionary, <https://share.google/WyPFx4Yde9TkKSgwQ> (Last visited 12th August)

⁴ The legal lock ,<https://share.google/EbNgjzEQnFmHeuIKt> (Last visited 12th August)

⁵ Bhartiya Nyaya Sanhita, 2023, s 22, No. 45 of Parliament of India, 2023

⁶ *R v Arnold*, [1992] 2 SCR 208

⁷ *R v Hadfield*, 2020 ONSC 5992

⁸ *R v McNaughton*, [1843] UKHL J16

2. To claim the defense of the Insanity, one should clearly show that at the time of the act, the accused was suffering from the defect or mental illness

3. At the time of doing act, he did not know the nature of the act

4. At the time of doing the act the accused do not know the that what he was doing was wrong”⁹

This rule saves the insane person from criminal liability and is used to determine the mental well-being of a person at the time of committing an offence. Under the M'Naughton rule, the burden of proof lies on the defence to establish whether the person was insane or not during the commission of the offence. This rule follows the basic principle of “Actus facit Reum Nisi Mens Sit Rea”, which means an act itself does not make someone guilty until they have the criminal intent or guilty mind.¹⁰ Section 22 of Bharatiya Nyaya Sanhita 2023 is more or less similar to the M'Naughton rule, in which a person is always assumed to be mentally fit until he prove his lack of mental competence and is unaware of the nature of the situation. This rule includes words as “Quality” and phrases, namely “contrary to law”, which are not present in section 22 of the Bharatiya Nyaya Sanhita. In the case of *Hazara Singh v State*, the concept of “furios nulla voluntas est” was introduced, which means a madman has no will. A madman was considered a mentally challenged person who could not make rational decisions. However, an individual who is suffering from a mental disorder does not automatically take the defence of insanity.¹¹ The case of *Bapu v. the State of Rajasthan* gave clarification on legal insanity over medical insanity.¹² In the case of *Dulal Naik v. State (1987)* court interprets the M'Naughton Rule with section 105 of the Indian Evidence Act,¹³ which means-

- This court always assumes the person is mentally fit and sound and can pass a rational judgment with a proper understanding of the circumstances unless the accused can prove otherwise.
- Proving insanity always lies with the accused, not with the prosecution.
- The conduct of the accused before or after the crime is immaterial for the defence of insanity – he must have been unsound and non-responsive to circumstances at the time

⁹ Angad, *Defence of insanity*, Legal Service India, (12th August 2025, 2 PM)
<https://www.legalserviceindia.com/legal/article-3140-defense-of-insanity.html>

¹⁰ Oishika banerji, *Actus non facit reum nisi mens sit rea*, Ipleader (12th August 2025, 2:30 PM)
<https://share.google/bz4Ko93z4U25lzXyt>

¹¹ *Hazara Singh v State*, AIR 1958 PUNJAB 104

¹² *Bapu v. the State of Rajasthan*, 2007 (8) SCC 66

¹³ Indian Evidence Act, 1905, s 105

of the offence.¹⁴

THE FACTS OF THE CASE

1. On September 27, 2018, a farmer named Asam Gota was engaged in his agricultural activity. Dashrath Patra was accused and came there with an iron pipe to kill Asam Gota with it.
2. Another farmer named Fagu Ram Karang was cutting the grass on the agricultural land and saw the whole incident. Karang ran away from the place to save his life, and the accused chased him.
3. The accused was charged with several provisions, including murder(section 302), assault (section 352), and tampering with evidence (section 201) under the Indian Penal Code 1850.
4. The trial court found him guilty of the offence and sentenced him to life imprisonment for the murder.
5. He appealed to the Chhattisgarh High Court and stated that he was insane at the time of the incident without being aware of the facts of what he was doing, and used the witness to support his claim.
6. The High Court rejected his appeal and, relying on the facts in the medical report as normal, which was presented dated December 7, 2023, and upheld the decision of the trial court.
7. At the end case went to the Supreme Court for a final verdict and clarification of the grounds of insanity in the present case.¹⁵

ISSUE RAISED

1. Can an accused use section 84 of the Indian Penal Code to save himself from criminal liability?
2. What is the validity of a medical report of the accused's mental state, which was made long after the incident?
3. Is there any violation of Article 21 of the Constitution of India and the right to a fair trial of the accused?
4. Who is responsible for proving insanity as a defence in criminal matters?

¹⁴ Dulal Naik v. State, 1987 Cr LJ 1561 Cal

¹⁵ Amikus Qriae,< <https://theamikusqriae.com/case-comment-dashrath-patra-v-state-of-chhattisgarh-2025/>>
(Last visited 12th August)

CONTENTION OF APPELLANT

The learned counsel of the appellant outlined section 84 of the Indian Penal Code 1850¹⁶, which saves the accused person who is mentally challenged from criminal liability. He argued and pointed out the mental condition of the accused at the incident, which was not stable enough to understand the circumstances and nature of what he was doing. He also took references from Supreme Court cases - *Dahyabhai Chhaganbhai Thakkar v. State of Gujarat*.¹⁷ And *Rupesh Manger (Thapa) v. State of Sikkim* ¹⁸— to support his argument. In the case of Dahyabhai Chhaganbhai Thakkar, the doctrine of insanity was explained as –

- The prosecution's responsibility is to prove the accused guilty beyond a reasonable doubt.
- The court always assumes the sane nature of a person unless it is proved with the help of oral submission, documents or circumstances that he was insane at the time of the crime.
- Possibility of Reasonable doubt.

In the case of *Rupesh manager (Thapa) vs the state of Sikkim* court explained that “ *the standard of proof to prove the defence under Section 84 of the IPC is only a reasonable doubt. It is also well settled that a distinction has to be made between legal insanity and medical insanity, and it is not at all necessary to prove medical insanity*”.¹⁹

CONTENTION OF RESPONDENT

On the other hand, the state's counsel argued that as per the Indian Evidence Act 1905, the responsibility to prove the insanity lies on the accused unless there is any evidence showing the mental state during, before or after the incident, and the prosecution need not prove someone else's mental ability. As per the medical report, he was normal, and no other medical evidence was available at the time of the incident and The accused failed to produce credible evidence to prove his insanity. Therefore, the High Court had already decided the accused's inability to meet the burden of insanity.²⁰

¹⁶ Indian Penal Code, 1850, s 84

¹⁷ Dahyabhai Chhaganbhai Thakkar v. State of Gujarat, 1964 AIR 1563

¹⁸ Rupesh Manger (Thapa) v. State of Sikkim, 2023 INSC 829

¹⁹ Indian kanoon, < <https://share.google/O2cQIG5EIEHU4Tl50>> (Last visited 13th August 2025)

²⁰ Indian kanoon, < <https://share.google/O2cQIG5EIEHU4Tl50>> (Last visited 13th August 2025)

VERDICT

A two-judge bench of the Supreme Court, comprised of Justice Abhay S. Oka and Ujjal Bhuyan, heard the case. They allowed the appeal of the case *Dashrath Patra v. State of Chhattisgarh*, which overruled the Judgement of the High Court and ruled in favour of the accused person. The court said that it is wrong to interpret the mental state of the accused based on the medical report, which was made more than 5 years after the statement. The court also emphasized the importance of the prosecution's evidence and pointed out the failure of the prosecution in a timely medical check-up. The decision highlighted the significance of the reasonable doubt about the mental health of the accused at the time of the crime, and in this case accused created more than enough reasonable doubt to establish the ground for insanity. As a result, a verdict was delivered in favour of the accused and acquitted him.