



INDIAN JOURNAL OF  
LEGAL REVIEW

VOLUME 5 AND ISSUE 14 OF 2025

INSTITUTE OF LEGAL EDUCATION



## INDIAN JOURNAL OF LEGAL REVIEW

APIS – 3920 – 0001 | ISSN – 2583-2344

(Open Access Journal)

Journal's Home Page – <https://ijlr.iledu.in/>

Journal's Editorial Page – <https://ijlr.iledu.in/editorial-board/>

Volume 5 and Issue 14 of 2025 (Access Full Issue on – <https://ijlr.iledu.in/volume-5-and-issue-14-of-2025/>)

### Publisher

Prasanna S,

Chairman of Institute of Legal Education

No. 08, Arul Nagar, Seera Thoppu,

Maudhanda Kurichi, Srirangam,

Tiruchirappalli – 620102

Phone : +91 73059 14348 – [info@iledu.in](mailto:info@iledu.in) / [Chairman@iledu.in](mailto:Chairman@iledu.in)



© Institute of Legal Education

**Copyright Disclaimer:** All rights are reserved with Institute of Legal Education. No part of the material published on this website (Articles or Research Papers including those published in this journal) may be reproduced, distributed, or transmitted in any form or by any means, including photocopying, recording, or other electronic or mechanical methods, without the prior written permission of the publisher. For more details refer <https://ijlr.iledu.in/terms-and-condition/>

## THE PRIYADARSHINI MATTOO CASE: A CASE STUDY OF VICTIMOLOGY, STATE FAILURE, AND DELAYED JUSTICE

**AUTHOR** – POOJA S, STUDENT AT THE TAMILNADU DR AMBEDKAR LAW UNIVERSITY, CHENNA

**BEST CITATION** – POOJA S, THE PRIYADARSHINI MATTOO CASE: A CASE STUDY OF VICTIMOLOGY, STATE FAILURE, AND DELAYED JUSTICE, *INDIAN JOURNAL OF LEGAL REVIEW (IJLR)*, 5 (14) OF 2025, PG. 965-970, APIS – 3920 – 0001 & ISSN – 2583-2344.

### ABSTRACT

The Priyadarshini Mattoo case represents a profound illustration of systemic failure in the Indian criminal justice system, particularly in addressing crimes against women preceded by persistent threats and harassment. Despite repeated complaints made by the victim regarding stalking and intimidation, institutional apathy and investigative inaction culminated in her brutal rape and murder in 1996. The case underwent a complex judicial trajectory, beginning with an acquittal by the trial court, followed by reversal and imposition of the death penalty by the Delhi High Court, and concluding with commutation of the sentence to life imprisonment by the Supreme Court of India. This case study undertakes a detailed examination of the factual background, procedural history, judicial reasoning, and victimological dimensions of the case. It critically analyses issues such as secondary victimisation, abuse of influence, investigative lapses, appellate correction of miscarriage of justice, and sentencing jurisprudence. The study highlights the broader implications of the case for victim protection mechanisms, police accountability, and the administration of criminal justice in India.

### KEYWORDS

Priyadarshini Mattoo Case; Victimology; Crimes Against Women; Secondary Victimisation; Criminal Justice System; Investigative Lapses; Appellate Review; Gender Justice; Sentencing Jurisprudence.

### INTRODUCTION

Crimes against women, particularly those involving sexual violence and murder, test the credibility and responsiveness of the criminal justice system. When such crimes are preceded by clear warnings in the form of repeated complaints, threats, and stalking, the failure of state institutions assumes a deeper victimological and constitutional significance. The Priyadarshini Mattoo case stands as a stark reminder of how institutional apathy and abuse of power can compound victimisation and ultimately lead to irreversible harm.<sup>1862</sup>

Priyadarshini Mattoo, a young law student, repeatedly approached law enforcement authorities seeking protection from persistent harassment and threats. Her pleas, however, were met with inaction. The subsequent rape and murder not only highlighted the immediate criminal act but also exposed structural deficiencies in policing, investigation, and prosecution. The case thus transcends individual criminal liability and raises broader questions concerning state responsibility, equality before law, and access to justice.

From a legal standpoint, the case is significant for its complex procedural history. The acquittal by the trial court despite strong circumstantial evidence, the reversal of that acquittal by the

<sup>1862</sup> State (NCT of Delhi) v. Santosh Kumar Singh, (2010) 9 S.C.C. 747 (India).

Delhi High Court with the imposition of the death penalty, and the eventual commutation by the Supreme Court reflect the layered functioning of appellate review in correcting miscarriages of justice. Each stage of adjudication offers important insights into evidentiary appreciation, standards of proof, and sentencing principles.<sup>1863</sup>

This case study aims to analyse the Priyadarshini Mattoo case through the lens of victimology and criminal justice administration. It focuses on the systemic failures preceding the crime, the judicial response at various stages, and the lessons that emerge for strengthening victim protection, police accountability, and gender justice in India.<sup>1864</sup>

#### BACKGROUND AND FACTS OF THE CASE

Priyadarshini Mattoo was a 25-year-old law student residing alone in Delhi while pursuing her legal studies. Over a considerable period prior to her death, she was subjected to persistent stalking, harassment, and intimidation by Santosh Kumar Singh, a fellow law student and the son of a senior officer of the Indian Police Service. The accused repeatedly followed her, made unwanted advances, issued threats, and created an atmosphere of fear that severely affected her sense of safety and autonomy.

The victim lodged multiple complaints with the police, explicitly expressing apprehension regarding her safety and seeking protection from the accused. These complaints detailed the pattern of stalking and harassment and clearly indicated the potential for escalation into serious violence. Despite the seriousness of these allegations and the identifiable risk involved, the police failed to initiate effective preventive or protective measures. The inaction of law enforcement authorities later emerged

as a critical factor contributing to the tragedy.<sup>1865</sup>

On 23 January 1996, Priyadarshini Mattoo was found brutally raped and murdered in her residence. The crime scene revealed extreme violence, including sexual assault followed by homicide, suggesting a premeditated and brutal act. Given the accused's prior conduct, familiarity with the victim, and circumstantial links, Santosh Kumar Singh was identified as the prime suspect.

The factual matrix of the case is significant not only for the heinous nature of the crime but also for the systemic failures that preceded it. The background underscores how institutional negligence and misuse of influence can exacerbate vulnerability and lead to irreversible harm, making the case a critical study in victimology and criminal justice administration.<sup>1866</sup>

#### PROCEDURAL HISTORY AND TRIAL COURT PROCEEDINGS

Following the discovery of the crime, Santosh Kumar Singh was arrested and charged under the relevant provisions of the Indian Penal Code, including offences relating to rape and murder. The investigation, however, was marred by serious lapses from the outset. Allegations were raised regarding improper collection of evidence, delayed forensic examination, and failure to pursue certain investigative leads with due diligence. These shortcomings later assumed critical importance during the trial.

The case was tried before the Sessions Court in Delhi. During the trial, the prosecution relied primarily on circumstantial evidence, forensic material, and the prior conduct of the accused, including evidence of stalking and harassment. While the trial court acknowledged the existence of strong suspicion against the accused, it held that the prosecution had failed to establish guilt beyond reasonable doubt. The court expressed reservations regarding the

<sup>1863</sup> State (NCT of Delhi) v. Santosh Kumar Singh, 2006 SCC OnLine Del 1395 (India).

<sup>1864</sup> Indian Penal Code, No. 45 of 1860, §§ 302, 376 (India) (as applicable at the time of offence).

<sup>1865</sup> Id. § 354 (outraging modesty of a woman) (pre-2013 position).

<sup>1866</sup> Id. § 354 (outraging modesty of a woman) (pre-2013 position).

reliability of forensic evidence and the completeness of the investigative process.<sup>1867</sup>

In 1999, the Sessions Court acquitted the accused of all charges. The judgment noted serious deficiencies in the prosecution's case but also made strong observations on the suspicious circumstances surrounding the accused. The acquittal was widely criticised, both legally and socially, for failing to adequately appreciate the cumulative effect of the evidence and for placing excessive emphasis on investigative lapses at the cost of substantive justice.

The trial court's decision exposed the fragility of criminal prosecution in cases involving influential accused persons and highlighted the consequences of inadequate investigation. The acquittal also intensified public discourse on judicial accountability, victim rights, and the systemic obstacles faced by women seeking justice, thereby setting the stage for appellate intervention.

#### **DELHI HIGH COURT JUDGMENT AND APPELLATE INTERVENTION**

Aggrieved by the acquittal of the accused, the State preferred an appeal before the Delhi High Court. The High Court undertook a comprehensive reappraisal of the entire evidentiary record, including forensic material, circumstantial evidence, and the prior conduct of the accused. Unlike the trial court, the High Court adopted a holistic approach, examining the cumulative effect of the evidence rather than viewing each circumstance in isolation.<sup>1868</sup>

In its judgment delivered in 2006, the Delhi High Court reversed the acquittal and convicted Santosh Kumar Singh for offences of rape and murder. The Court held that the trial court had committed a grave error in discarding credible evidence and had failed to appreciate the strong chain of circumstances pointing conclusively towards the guilt of the accused.

The High Court observed that the investigative lapses, though present, could not overshadow the substantive evidence establishing culpability.

The High Court also took note of the persistent harassment and stalking faced by the victim prior to the crime, recognizing these facts as relevant in establishing motive and premeditation. It strongly criticised the failure of law enforcement authorities to act on the victim's complaints, describing such inaction as a contributory factor in the commission of the crime.<sup>1869</sup>

Considering the brutality of the offence and the circumstances surrounding it, the Delhi High Court awarded the death penalty to the accused, categorising the case as falling within the "rarest of rare" doctrine. The judgment marked a significant instance of appellate correction of a miscarriage of justice and reaffirmed the power of appellate courts to reverse acquittals where the findings of the trial court are perverse or unreasonable.<sup>1870</sup>

#### **SUPREME COURT DECISION AND SENTENCING ANALYSIS**

The conviction and death sentence imposed by the Delhi High Court were challenged before the Supreme Court of India. While the Supreme Court upheld the findings of guilt recorded by the High Court, it undertook an independent and careful analysis of the question of sentencing, particularly in the context of the "rarest of rare" doctrine governing capital punishment in India.

The Supreme Court affirmed that the evidence on record conclusively established the guilt of the accused for the offences of rape and murder. It agreed with the High Court's assessment that the trial court had erred in granting acquittal and that the appellate reversal was justified. The Court also

<sup>1867</sup> Code of Criminal Procedure, No. 2 of 1974, § 378 (India) (appeal against acquittal).

<sup>1868</sup> Bachan Singh v. State of Punjab, (1980) 2 S.C.C. 684 (India) (rarest of rare doctrine).

<sup>1869</sup> Chandrappa v. State of Karnataka, (2007) 4 S.C.C. 415 (India) (principles governing appellate interference with acquittal).

<sup>1870</sup> Machhi Singh v. State of Punjab, (1983) 3 S.C.C. 470 (India) (sentencing principles in capital punishment).

acknowledged the gravity of the offence and the extreme brutality inflicted upon the victim.

However, on the issue of sentence, the Supreme Court adopted a more nuanced approach. While recognising the heinous nature of the crime, the Court held that the case did not meet the stringent threshold required for the imposition of the death penalty. Emphasising the principle that capital punishment must be reserved for the rarest of rare cases, the Court commuted the death sentence to life imprisonment.

The Supreme Court's sentencing analysis reflected a balance between retributive justice and constitutional safeguards against excessive punishment. The decision reaffirmed that sentencing must be guided not only by the nature of the crime but also by broader principles of proportionality, human dignity, and the possibility of reform. The commutation underscored the Court's consistent reluctance to impose the death penalty except in the most exceptional circumstances.<sup>1871</sup>

### **VICTIMOLOGICAL ANALYSIS AND SYSTEMIC FAILURES**

The Priyadarshini Mattoo case presents a compelling study in victimology, particularly in relation to secondary victimisation and systemic neglect by state institutions. Victimisation in this case did not begin with the commission of the crime but unfolded over time through persistent stalking, intimidation, and the repeated failure of authorities to respond effectively to the victim's complaints. This prolonged exposure to threat without institutional protection significantly aggravated the harm suffered by the victim.

A critical aspect of the case is the role of institutional apathy. Despite multiple complaints that clearly indicated escalating danger, law enforcement authorities failed to provide protection or take preventive action against the accused. This failure not only

violated the victim's right to personal liberty and security but also reflected broader structural deficiencies in policing, particularly in cases involving influential accused persons.<sup>1872</sup>

The case also highlights the phenomenon of secondary victimisation, wherein the victim's suffering is compounded by the actions or inaction of institutions entrusted with protection and justice. The failure to act on prior complaints, investigative lapses, and the initial acquittal collectively contributed to a perception of injustice and eroded public confidence in the criminal justice system. From a victimological perspective, the system's response—or lack thereof—became an extension of the harm inflicted upon the victim.

Furthermore, the case underscores the gendered dimensions of crime and justice. Stalking and harassment, often dismissed as minor or non-serious offences, were treated with insufficient urgency despite their known potential to escalate into severe violence. The Priyadarshini Mattoo case thus exposes the urgent need for robust mechanisms for victim protection, early intervention, and gender-sensitive policing.

### **LEGAL AND SOCIAL SIGNIFICANCE OF THE CASE**

The Priyadarshini Mattoo case holds profound legal and social significance within the Indian criminal justice framework. Legally, the case stands as an important precedent on the appellate reversal of acquittal, demonstrating the power and responsibility of higher courts to correct miscarriages of justice where trial court findings are manifestly unreasonable or perverse. The Delhi High Court's intervention, later affirmed on merits by the Supreme Court, reinforced the principle that procedural lapses cannot be allowed to eclipse substantive justice.<sup>1873</sup>

From the perspective of criminal law, the case contributed to the discourse on sentencing jurisprudence, particularly the application of the

<sup>1871</sup> Nilabati Behera v. State of Orissa, (1993) 2 S.C.C. 746 (India) (state liability for failure to protect life).

<sup>1872</sup> Constitution of India, art. 21.

<sup>1873</sup> Law Comm'n of India, 172d Report on Review of Rape Laws (2000).

“rarest of rare” doctrine. The Supreme Court’s decision to commute the death sentence to life imprisonment reaffirmed the constitutional emphasis on proportionality and restraint in the imposition of capital punishment, even in cases involving extreme brutality.

Socially, the case became a catalyst for public debate on women’s safety, stalking, and institutional accountability. It exposed how repeated complaints of harassment were trivialised and ignored, ultimately leading to fatal consequences. The public outrage surrounding the case highlighted the urgent need for legal recognition of stalking as a serious offence and for stronger preventive mechanisms to protect women from escalating violence.<sup>1874</sup>

The case also underscored the impact of power and influence in criminal proceedings, raising concerns about equality before law and the impartial functioning of investigative agencies. As a result, the Priyadarshini Mattoo case continues to be cited as a cautionary tale in discussions on police reform, victim protection, and gender justice.

### **INVESTIGATIVE LAPSES AND POLICE ACCOUNTABILITY**

One of the most disturbing aspects of the Priyadarshini Mattoo case is the series of investigative lapses that occurred both before and after the commission of the crime. Despite clear indicators of threat to the victim’s life, the police failed to initiate preventive action, conduct timely surveillance, or impose restrictions on the accused. This omission amounted to a failure of the state’s duty to protect life under Article 21 of the Constitution of India.

Post-incident investigation also suffered from deficiencies, including improper handling of forensic evidence, delays in examination, and lack of rigorous follow-up. These lapses significantly weakened the prosecution case at

the trial stage and contributed to the acquittal by the Sessions Court. The case thus illustrates how poor investigation can undermine substantive justice, even where strong circumstantial evidence exists.<sup>1875</sup>

From the perspective of criminal justice administration, the case raises serious questions about police accountability, particularly in situations involving influential accused persons. It underscores the need for institutional safeguards to ensure impartial investigation, insulation from external influence, and strict consequences for dereliction of duty. Strengthening internal oversight mechanisms and independent investigation processes emerges as a crucial lesson from this case.<sup>1876</sup>

### **GENDER JUSTICE, STALKING, AND PREVENTIVE CRIMINAL LAW**

The Priyadarshini Mattoo case predates the statutory criminalisation of stalking in India, yet it powerfully demonstrates the dangers of treating stalking and harassment as minor or non-cognisable offences. The persistent stalking faced by the victim was a clear precursor to the ultimate crime, highlighting the predictive value of such conduct in gender-based violence.

The case contributed to broader social and legal discourse that eventually led to the recognition of stalking as a serious criminal offence under Indian law. It exposed the gender-insensitive approach of law enforcement agencies and the absence of preventive legal tools to address escalating patterns of harassment. From a gender justice perspective, the case illustrates how failure to intervene at early stages disproportionately endangers women and reinforces structural inequality.

This section underscores the importance of preventive criminal law, victim-centred policing, and early legal intervention in cases of

<sup>1874</sup> Law Comm’n of India, 154th Report on the Code of Criminal Procedure, 1973 (1996).

<sup>1875</sup> Criminal Law (Amendment) Act, No. 13 of 2013, § 354D, India Code (2013) (stalking).

<sup>1876</sup> Shakti Vahini v. Union of India, (2018) 7 S.C.C. 192 (India) (preventive and protective duties of the state).

harassment and threats. The Priyadarshini Mattoo case thus serves as a foundational reference in understanding why gender-sensitive reforms and proactive policing are essential components of an effective criminal justice system.<sup>1877</sup>

### **ROLE OF MEDIA, PUBLIC OPINION, AND JUDICIAL ACCOUNTABILITY**

The Priyadarshini Mattoo case attracted intense media scrutiny and widespread public outrage, particularly following the acquittal by the trial court. Media reporting played a significant role in keeping the case in public consciousness and highlighting perceived failures in investigation and prosecution. This sustained attention contributed to a broader societal demand for accountability and justice, ensuring that the case did not fade into obscurity.

From a criminal justice perspective, the role of public opinion in this case raises important questions about judicial accountability and transparency. While courts are expected to function independently of public sentiment, sustained public scrutiny can act as an external check against arbitrariness and institutional complacency. In the Priyadarshini Mattoo case, appellate review occurred within a climate of heightened public awareness, reinforcing the perception that justice must not only be done but must also be seen to be done.<sup>1878</sup>

However, the case also cautions against the risks of media sensationalism and trial by media. Excessive or prejudicial reporting can compromise the rights of the accused and undermine fair trial guarantees. The case thus highlights the need for a balanced approach, where media acts as a watchdog without encroaching upon the integrity of judicial processes. This section underscores the complex interaction between media, public perception, and the judiciary, demonstrating how societal engagement can influence

criminal justice outcomes while simultaneously demanding safeguards to preserve judicial independence.

### **CONCLUSION AND LESSONS FOR CRIMINAL JUSTICE ADMINISTRATION**

The Priyadarshini Mattoo case serves as a stark reminder that the effectiveness of the criminal justice system is measured not only by its ability to punish offenders but also by its capacity to prevent harm and protect victims. The tragic outcome of the case was not merely the result of an individual criminal act but was deeply intertwined with systemic failures, including institutional apathy, investigative lapses, and the misuse of influence.

From a legal standpoint, the case demonstrates the critical role of appellate courts in correcting miscarriages of justice and reinforcing the principle that equality before law must prevail irrespective of the status of the accused. The judicial journey of the case reflects both the vulnerabilities and the corrective mechanisms inherent in the criminal justice process.

From a victimological perspective, the case highlights the urgent need for early intervention, effective response to stalking and harassment, and robust victim protection mechanisms. The failure to act on prior complaints underscores the importance of treating threats and harassment as serious precursors to violent crime rather than isolated or trivial incidents.

The lessons drawn from the Priyadarshini Mattoo case underscore the necessity of strengthening police accountability, improving investigative standards, and adopting gender-sensitive approaches in criminal justice administration. Ultimately, the case remains a powerful reference point for reform-oriented discourse, emphasizing that justice must be timely, responsive, and centered on the dignity and safety of victims.

<sup>1877</sup> Laxmi v. Union of India, (2014) 4 S.C.C. 427 (India) (victim-centred approach and state responsibility).

<sup>1878</sup> Zahira Habibullah Sheikh v. State of Gujarat, (2004) 4 S.C.C. 158 (India) (fair trial and systemic failure).