



The Indian Journal for Research in Law and Management

Open Access Law Journal – Copyright © 2024

Editor-in-Chief – Dr. Muktai Deb Chavan; Publisher – Alden Vas; ISSN: 2583-9896

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R v. DANIEL M'NAUGHTEN 1843 10 C & F 200

CASE LAW ANALYSIS

BY:-

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INTRODUCTION

In the domain of legal history, there has been a profound and thorough examination of the intricacies surrounding insanity and how it affects the accountability of individuals in the context of criminal law. This inquiry delves into situations where people, driven by delusions, carried out actions believing they were addressing perceived injustices. It prompts fundamental questions about the legal responsibility of individuals dealing with mental health challenges when facing criminal charges.

The concept of insanity has evolved significantly over the centuries. In the early 13th century, before the establishment of the insanity defense, individuals with mental illness were often misunderstood and subjected to beliefs in demonic possession or accusations of witchcraft. The understanding of mental illness began to change in the early 13th century when Lord Bracton introduced the idea of mental deficiency impacting human behavior.

Lord Bracton's perspective reflected a shift from viewing individuals with mental illness as Demon possessions or witchcraft to recognizing a form of mental incapacity. He remarked, "Such persons are not much different from brutes (brutis) which lack reasoning, nor should anything that is done with such people be valid as long as their madness lasts."¹ This marked the beginning of acknowledging mental impairment in legal contexts. Before the M'Naughten case, the standard for insanity in the courts was determined to be such that a "man must be totally deprived of his understanding and memory so as not to know what he is doing, no more than an infant, brute or a

¹ OP. CIT., Lib. V, Cap 20

wild beast"². This led to the foundation of the 'wild beast test' which was used extensively until the establishment of the M'Naughten rules which had more scope and reasoning.

As we progress through this exploration, we will encounter the establishment of substantial legal standards that leave a lasting impact on how we evaluate the defense of insanity. These standards place particular emphasis on an individual's mental state and their ability to understand the nature and moral aspects of their actions.

This narrative not only provides valuable insights into a crucial legal framework but also continues to shape discussions at the intersection of mental health, criminal responsibility, and the legal system. In the case R v. Daniel M'Naughten we discuss the issue of insanity and the established principles for determining the culpability of a crime committed by an insane person.

FACTS

In January 1843, within the parish of Saint Martin, Middlesex, a man named Daniel M'Naughten committed a grave act. He shot Edward Drummond, believing Drummond to be British Prime Minister Robert Peel. Drummond, critically wounded, succumbed to his injuries five days later. Consequently, M'Naughten faced a murder charge but pled not guilty, citing insanity as the reason.

During the trial, multiple witnesses came forward to testify on M'Naughten's behalf. They provided accounts of his mental state at the time of the incident. Some of these witnesses had personally examined M'Naughten before the trial, while others formed their opinions based on the testimony of others who had interacted with him.

Medical professionals presented evidence indicating that individuals with otherwise sound minds might be afflicted by morbid delusions. M'Naughten, they argued, suffered from such delusions. While he retained a fundamental understanding of right and wrong, his actions were profoundly influenced by these delusions, causing him to act without a clear moral compass.

² Melton, p. 190, 1997

In light of this, it was argued that M'Naughten had limited control over his actions while under the sway of these delusions. These delusions gradually intensified until they reached a climax with the shooting of Drummond. The evidence also suggested that individuals in M'Naughten's condition might live peacefully for a significant period under the influence of such delusions but could suddenly experience violent and uncontrollable episodes.

In terms of the legal charge against M'Naughten, Lord Chief Justice Tindal clarified the central question. He emphasized that it hinged on whether, at the time of the act, M'Naughten possessed the mental capacity to comprehend that he was committing a wrongful or morally wicked act. If jurors believed that M'Naughten was not in his right mind at the time of the act and had no awareness that he was violating moral and legal principles, he would be entitled to a verdict in his favor. Conversely, if they believed he was in a sound state of mind when he committed the act, their verdict would be against him.

ISSUES

1. What are the legal principles when individuals, aware of breaking the law, commit a crime under the influence of insane beliefs, aiming to right perceived wrongs or achieve what they believe is a public good?
2. Can a person who commits a crime due to insane beliefs about existing facts claim an excuse for their actions?

JUDGEMENT

In the case of Daniel M'Naughten, the court held that he was found not guilty because of insanity. The court determined that M'Naughten was not legally responsible for his actions due to his insane delusions. This decision was based on the M'Naughten Rules, which were formulated in response to a series of hypothetical questions about insanity that a panel of judges had to address. According to these rules, a defendant who wishes to rely on the defense of insanity must demonstrate that they were laboring under a defect of reason caused by a disease of the mind. Specifically, the defendant must show that they either did not know the nature and quality of their acts or that they did not know their actions were wrong.

In the case of Daniel M'Naughten, it was determined that his actions were a result of his diseased mind and his inability to understand the wrongfulness of his actions due to his delusions. As a result, he was acquitted on the grounds of insanity.

ANALYSIS

R v. M'Naughten³ is a landmark case in which the mental state of Daniel M'Naughten was characterized by morbid delusions. At the time of the crime, M'Naughten believed that he was shooting Sir Robert Peel but, in reality, he shot and killed Edward Drummond, who was the private secretary to the Prime Minister, his intention to kill was formed under the delusion that Sir Robert Peel had sent spies to monitor him and ultimately kill him.

Here comes the important question of what exactly determines the criminal liability of a person? and what are the legal principles when individuals, aware of breaking the law, commit a crime under the influence of insane beliefs, aiming to right perceived wrongs or achieve what they believe is a public good? Generally, for the determination of criminal liability of a person Actus reus and Mens rea are both required for the commission of an offense⁴, But the determination of criminal liability for people with mental illness or insanity is a special case. Lord Bracton was very sophisticated, even by modern standards, in his description of the criminal offender who was insane. Such a person could not be guilty of a crime because he did not have a "corrupt intent" or the "will to harm" or "malice"; he was protected by the "imbecility of the deed", his lack of "reason", "sense" and "understanding", and his likeness to a "young child" or "brute"⁵ He meant to say that, the one who is unable to form reason, sense or understanding of the consequences of his actions and has a nature similar to that of a child or an animal cannot form a malicious intention. Although the defendant committed the crime understanding the distinction between right and wrong, the influence of delusions led him to cause such an act, but would a reasonable and sane man do the same thing? In this case, given the reason behind committing such an act, the answer is no. Hence there is no Mens rea.

³ 1843 10 C & F 200

⁴ Fowler v. Padget, 7 TR 509 (1798)

⁵ Anthony M. Platt, The Origins and Development of the "Wild Beast" Concept of Mental Illness and Its Relation to Theories of Criminal Responsibility, 1, 6 (*Issues in Criminology*, vol. 1, no. 1, 1965.)

But if crimes are excused solely based on this reasoning, then there are more chances for people to avoid criminal responsibility by simply taking the defense of Insanity, Hence various courts based on the facts of various cases, formulated some rules for the defense of insanity.

The case *Rex v. Arnold*⁶ led to the establishment of the wild beast test, later, the case *R v Hadfield*⁷ which established 'the Insane Delusion Test' led the court to reject the prior laws related to insanity under two grounds: First, you don't have to be entirely without mental faculties to be found not guilty due to insanity. Secondly, the link between insanity and knowing right from wrong was loosened. The court, however, was not satisfied to give the judgment in the present case solely based on the rules mentioned above but took into consideration the prior rules and various important elements to make the decision.

Daniel Naughten's actions were profoundly influenced by delusions, suggesting a degree of diminished capacity to adhere to a clear moral compass due to which the court wanted to lay down a more comprehensive and well-rounded rule that determines the scope of insanity as a defense which led to the establishment of The M'Naughten rule, which states: "To establish a defense on the ground of insanity it must be proved that, at the time of committing the act, the party accused was laboring under such a defect of reason from disease of the mind, as not to know the nature and quality of the act he was doing, or if he did know it, that he did not know that what he was doing was wrong. If the accused was conscious that the act was one which he ought not to do, and if that act was at the same time contrary to the law of the land, he is punishable."⁸

The issues raised regarding the rule have been discussed in several cases, through which we can determine with certainty about who can actually take the defense of Insanity. In the case of *Bratty v Attorney-General for Northern Ireland*,⁹ the contention from the defendant's side was that the defendant committed the crime in a state of automatism, and in the case of *R v. Clarke*¹⁰ the defendant had shoplifted without any intention of doing so due to her state of depression, the court in both cases held that the Rules apply only to cases in which the defect of the reason is substantial.

⁶ 16 St. Tr. 695(1724)

⁷ 27 St. Tr. 128(1800)

⁸(Dec.1,2015),https://www.cambridge.org/core/services/aopcambridgecore/content/view/A1CD0D35A6416987A62AE74665602800/S2056467800001316a.pdf/towards_a_more_just_insanity_defence_recovering_moral_wrongfulness_in_the_mnaghten_rules.pdf.

⁹ ACT 386 (1963)

¹⁰ 1 All E R 219 (1972)

This problem arises due to the narrowness of the M'Naughten test, it does not provide the scope of 'disease of mind' and it is left to the judges to decide the scope, which can become a huge loophole if the court is not guided by experienced medical professionals. Here arises the question of whether it is permissible for a medical professional knowledgeable about insanity, who didn't meet the defendant before the trial but was present throughout the legal proceedings, to provide an opinion on the defendant's mental state at the time of the alleged crime and if Can they give an expert view on whether the defendant was aware, during the act, that their actions violated the law or if they were under specific delusions at the time? Yes, to accurately determine the reason behind the actions of the defendant a medical professional should be at the court, but merely being present at the legal proceeding and to form a conclusion of whether the person was insane at the time of commission of the crime is not right because the unsoundness of mentality before and after the commission of crime is a relevant fact¹¹

The narrowness of it is also the reason why the widely followed Naughten rule is being modified or replaced by other tests or rules. These are some of the cases where the rule has been replaced:

In *People v. Drew*,¹² the Supreme Court replaced the "M'Naughten test" of insanity with the following test proposed by the American Law Institute: "A person is not responsible for criminal conduct if at the time of such conduct as a result of mental disease or defect, he lacks substantial capacity either to appreciate the criminality wrongfulness of his conduct or to conform his conduct to the requirements of law."¹³ Due to the narrowness of the rules.

In the case, *People v. Skinner*¹⁴ the trial court had concluded that the defendant knew the nature and quality of his act, but his schizophrenia produced a delusion that left him unable to distinguish moral right and wrong.¹⁵ The court's comment about delusions was part of its review of California case law on insanity that supported its conclusion that the defendant was entitled to entry of a judgment of not guilty because of insanity because he was unable to appreciate the moral wrongfulness of his act.¹⁶

¹¹ Shrikant Anandrao Bhosale v. State of Maharashtra (2003) 7 SCC 748

¹² 22 Cal.3d 333 (1978)

¹³ *Drew*, at pp. 336-337, fn. 3.

¹⁴ 39 Cal.3d 765(1985)

¹⁵ *Id.* at p. 770.

¹⁶ *Id.* at pp. 770, 781, 784.

CONTRIBUTION OF THE CASE TO THE GROWTH IN THE CONCERNED AREA

1. M'Naghten Rules

Following the R v. Naughten case, the House of Lords deliberated on the issue of criminal liability when the accused could not understand the nature of their actions. In response, fifteen judges were called upon to address this matter and provide answers to specific questions. Among them, fourteen judges concurred in their responses. Chief Justice Tindal presented the majority viewpoint, and the collective answers became known as M'Naughten's Rule. The M'Naughten rule is as follows:

- i. The starting assumption is that every individual is presumed to be mentally sound and possesses enough reasoning capacity to be accountable for their actions unless proven otherwise.
- ii. A person with a mental disorder can be held accountable for their actions only if they are aware of their deeds at the time of the crime.
- iii. For an insanity defense to be valid, the accused, due to a lack of reasoning or mental illness, must be incapable of understanding the nature and consequences of their actions.
- iv. An individual affected by a mental disorder should be treated as if the circumstances leading to their delusion were real when assessing responsibility.
- v. The responsibility of determining the defendant's sanity lies with the jury.

2. Laws Related to the Defense of Insanity in India

The Indian Laws related to insanity have been developed from M'Naughten's rules, especially Section 87 of the IPC.

The essentials for a person to be declared insane according to Sec 84 of IPC:

1. The individual must lack the capacity to understand the nature of the action.
2. The individual must lack the capacity to recognize whether the committed act is morally wrong.
3. The individual must lack the capacity to realize that the act is contrary to the law.

Section 87 of the Indian Penal Code includes a broader term for insanity which is ‘unsound mind’ it states that Nothing is an offense 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.”¹⁷ Section 84 lays down the legal test of responsibility in cases of alleged unsoundness of mind.

There is no definition of ‘unsoundness of mind’ in IPC. The courts have, however, mainly treated this expression as equivalent to insanity. But the term ‘insanity’ itself has no precise definition. It is a term used to describe varying degrees of mental disorder. So, every person, who is mentally diseased, is not ipso facto exempted from criminal responsibility. A distinction is to be made between legal insanity and medical insanity. A court is concerned with legal insanity, and not with medical insanity.”¹⁸The word insanity can be broadly categorized into medical insanity and legal insanity, A court is concerned with legal insanity, and not with medical insanity.^{19,20} “Any person, who is suffering from any kind of mental illness is called “medical insanity,” however “legal insanity” means, the person suffering from mental illness should also have a loss of reasoning power. The term legal insanity also refers to the “mental state” of a person at the time of committing a crime and nothing else. This is purely a legal concept and is unrelated to the various psychiatric diagnoses. In simple words, legal insanity means, at the time of the commission of the act, the person should be suffering from mental illness and also have a loss of reasoning power.”²¹Mere abnormality of mind or partial delusion, irresistible impulse, or compulsive behavior of a psychopath affords no protection under Section 84 IPC.²² In the case of Surendra Mishra versus the state of Jharkhand²³, the Supreme Court declared that an individual seeking exoneration from responsibility under Section 84 of the IPC must establish legal insanity rather than medical insanity.

¹⁷ The Indian Penal Code, 1860, §84, No. 45 Act of Parliament, 1860 (India)

¹⁸ Hari Singh Gond v. State of Madhya Pradesh, (2008) 16 SCC 109

¹⁹ Hari Singh Gond v. State of Madhya Pradesh. 2008, 16 SCC 109

²⁰ Gujraj Singh v. State of Rajasthan, (2007) 8 SCC 66

²¹ Math, S. B., Kumar, C. N., & Moirangthem, S. (2015). Insanity Defense: Past, Present, and Future. Indian journal of psychological medicine, 37(4), 381–387. <https://doi.org/10.4103/0253-7176.168559>

²² Gujraj Singh v. State of Rajasthan, (2007) 8 SCC 66

²³ 2011, 11 SCC 495

Burden of proof

The prosecution is responsible for proving the offense beyond a reasonable doubt. In an insanity defense under Section 84 of the IPC, the accused must demonstrate the relevant circumstances, as per Section 105 of the Evidence Act, placing the burden of proof on the accused, with the court presuming the absence of such circumstances until proven otherwise. The accused needs to provide evidence, like expert opinions, statements, or documents, to convince the court that they couldn't understand the nature of their actions or recognize whether it was wrong or against the law.²⁴

The Supreme Court has clarified that the key moment to establish mental unsoundness is when the crime occurs. The responsibility to prove this falls on the appellant seeking the defense of Section 84²⁵²⁶ The accused doesn't have to prove innocence beyond all doubt; they just need to convince the court based on the likelihood of their claims. The burden on the accused is similar to that in civil proceedings.²⁷²⁸

CONCLUSION

the M'Naughten rules have played a crucial role in shaping the framework for addressing criminal responsibility in cases involving mental illness or insanity. The emphasis on identifying a defect of reason stemming from a disease of the mind, along with assessing the accused's awareness of the nature and quality of their actions, has formed the cornerstone for establishing criteria in insanity defenses.

While subsequent cases and tests have emerged to address the inherent limitations of the M'Naughten rules, the essence of requiring a significant impairment of reasoning due to mental illness remains pivotal. Striking the right balance between holding individuals accountable for their actions and acknowledging the impact of mental health on their ability to adhere to legal standards presents an ongoing challenge.

²⁴ State of Rajasthan v. Shera Ram , Vishnu Dutta. 2012, 1SCC602

²⁵ Anand Rao Bhosale v. State of Maharashtra. 2002, 7 SCC 748

²⁶ Ratan Lal Vs. State of Madhya Pradesh. 1970 (3) SCC 533.

²⁷ Sudhakaran v State of Kerala. 2010 (10) SCC 582.

²⁸ T.N. Lakshmaiah v. State of Karnataka. 2002, 1 SCC 219

The dynamic evolution of insanity defenses, evident through various legal tests, underscores a continuous effort to refine and adapt legal principles to the intricate nature of mental health.

Ultimately, the M'Naughten rules serve as a foundational framework, and any considerations for modifications or replacements should delicately navigate the intricate balance between legal principles and a nuanced understanding of mental health issues. The primary focus should remain on ensuring a fair and just legal response for individuals confronting criminal charges within the complex context of mental health challenges.