



The Indian Journal for Research in Law and Management

Open Access Law Journal – Copyright © 2026

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

This is an Open Access article distributed under the terms of the Creative Commons Attribution-Non-Commercial-Share Alike 4.0 International (CC-BY-NC-SA 4.0) License, which permits unrestricted non-commercial use, distribution, and reproduction in any medium provided the original work is properly cited.

NAVAS @ MULANAVAS V. STATE OF KERALA

-Kabhilakshya D V

ABSTRACT

The Supreme Court's decision in Navas @ Mulanavas v. State of Kerala examines the validity of convictions based exclusively on circumstantial evidence and the principles governing capital sentencing. In a case involving a brutal multiple homicide with no eyewitnesses, the Court reaffirmed the Sharad Birdhichand Sarda test and clarified the operation of Section 106 of the Indian Evidence Act. It also upheld the admissibility of forensic reports under Section 293 of the CrPC. While confirming the accused's guilt, the Court rejected the death penalty, substituting it with 25 years' rigorous imprisonment without remission, thereby strengthening the doctrine of proportional and humane sentencing.

CASE CITATION

The case of Navas @ Mulanavas v. State of Kerala was decided by the Supreme Court of India on March 18, 2024¹ of CRIMINAL APPEAL NO. 1215 OF 2011.

FACTS OF THE CASE

Ramachandran, a man living in Kerala, shared his household with his wife Latha, their young daughter Chitra aged eleven, and his elderly mother, Karthiayani Amma. The accused, Navas, had previously been romantically involved with Latha, and this relationship had even led to a pregnancy that was later terminated. When Latha decided to sever ties, Navas's resentment grew. In February 2005, he had already attempted to break into their house and attack her, but that incident was prevented after the family lodged a police complaint.

¹ *Navas @ Mulanavas v. State of Kerala*, 2024 INSC 215 (Supreme Court of India, Mar. 18, 2024).

On the fateful night of 3–4 November 2005, Navas returned to Ramachandran's home, allegedly forcing his way inside by breaking a hole in the wall. Armed with knives and an iron rod, he unleashed violence upon the family. Ramachandran and Chitra were murdered upstairs, while Latha was fatally stabbed near the staircase. The elderly mother, Karthiayani Amma, was assaulted and grievously injured; she succumbed shortly after. The next morning, the domestic help, Thankamani, arrived and sensed something was wrong. She saw blood dripping from a pipe, noticed a hole in the wall, and raised alarm. When the police broke open the locked house, they discovered the bodies and, crucially, also found Navas inside, injured from what appeared to be a suicide attempt.

During investigation, the prosecution examined thirty-two witnesses, supported by documents and forensic evidence. Navas, in his statement under Section 313 of the Code of Criminal Procedure, denied guilt. He claimed that he and Latha had agreed upon a suicide pact, and that he found the other family members already dead when he entered. Overcome with grief, he alleged, he attempted to kill himself. However, the courts found this narrative inconsistent with both the circumstantial and forensic evidence presented.²

ISSUES

Two primary issues framed the judicial inquiry:

1. Could the conviction of Navas be sustained solely on the basis of circumstantial evidence, given the absence of direct eyewitnesses?
2. Was the death penalty imposed by the trial court appropriate, or did proportional sentencing require a lesser but equally serious punishment?

ARGUMENTS BY PROSECUTION

The prosecution argued that Navas possessed a clear and compelling motive, rooted in his prior relationship with Latha and his hostility after she ended it. His presence at the crime scene was undeniable, as he was found inside the locked house. Under Section 106 of the Indian Evidence Act, the burden lay on him to explain these incriminating circumstances. His inability to provide a credible explanation further strengthened the inference of guilt.

Forensic evidence supported the prosecution's stance. Fingerprints and handwriting samples matched Navas, and the murder weapons bore links to him. The prosecution also emphasized the chain of circumstances, which was so complete that it excluded any reasonable hypothesis

² Idib

other than guilt. This satisfied the established legal test for convictions based on circumstantial evidence.

ARGUMENT BY DEFENCE

The defence relied on the suicide pact narrative, suggesting that Latha had allowed Navas into the house voluntarily and that the deaths had occurred prior to his arrival. It claimed that Navas's injuries were consistent with his suicide attempt, not with homicidal conduct. Furthermore, the defence attempted to cast doubt on the admissibility of the forensic handwriting report, since the expert had not been examined in person.

RATIO DECIDENDI

The Supreme Court held that a conviction could indeed rest solely on circumstantial evidence, provided the prosecution established a chain of events so complete that no alternative explanation was plausible. Relying on *Sharad Birdhichand Sarda v. State of Maharashtra*, the Court reiterated that the circumstances must be firmly established, consistent only with guilt, conclusive in nature, and must exclude all other possibilities.³

Applying this test, the Court concluded that Navas had motive, opportunity, and presence at the crime scene. His explanation under Section 106 of the Evidence Act was unconvincing and inconsistent with the forensic material. The handwriting analysis, though challenged, was admissible under Section 293 of the CrPC, as reports from certified forensic experts may be admitted without personal testimony.

On sentencing, the Court drew from the doctrine of proportionality established in *Bachan Singh v. State of Punjab*.⁴ It emphasized that the death penalty must be reserved for the "rarest of rare" cases where life imprisonment is wholly inadequate. Though the crime was brutal, the Court considered that 25 years of rigorous imprisonment without remission struck the right balance between deterrence and humanity, reducing the Kerala High Court's sentence of 30 years without remission.

LEGAL PRINCIPLES

The judgment crystallizes several important principles of criminal law.

³ *Sharad Birdhichand Sarda v. State of Maharashtra*, (1984) 4 SCC 116.

⁴ *Bachan Singh v. State of Punjab*, (1980) 2 SCC 684.

First, it affirms the robustness of circumstantial evidence as a basis for conviction, provided the *Sharad Birdhichand Sarda* test is satisfied. This ensures that courts remain cautious and methodical when relying on indirect proof.

Second, the application of Section 106 of the Evidence Act demonstrates that once incriminating circumstances are proved, the accused must explain facts within his special knowledge. This does not shift the burden of proof from the prosecution, but rather recognizes that silence or implausible explanations by the accused may reinforce the prosecution's case.⁵

Third, the admissibility of forensic reports under Section 293 CrPC highlights the importance of scientific evidence in modern trials. By upholding such reports even without the expert's oral testimony, the Court prioritizes efficiency without undermining fairness, since the defence retains the right to summon the expert if necessary.⁶

Finally, the sentencing analysis underscores the judiciary's evolving approach toward capital punishment. The reaffirmation of *Bachan Singh* ensures that death remains a penalty of last resort. By calibrating punishment to 25 years of imprisonment without remission, the Court promotes structured sentencing that avoids both extremes: premature release and capital execution.

CONCLUSION

The Supreme Court's judgment in *Navas @ Mulanavas v. State of Kerala* is significant not only for its resolution of a brutal murder case but also for the broader principles it reinforces in Indian criminal law. It demonstrates that circumstantial evidence, if carefully analyzed, can be sufficient to sustain a conviction. It validates the evidentiary value of scientific reports, ensures that the burden of explanation under Section 106 operates sensibly, and most importantly, moves sentencing toward a more structured, proportionate, and humane approach. By reducing the sentence to 25 years without remission, the Court struck a balance between society's demand for retribution and the principle that even the gravest crimes must be met with fairness. The judgment stands as a precedent for future cases where courts grapple with the complexities of circumstantial evidence and the moral gravity of sentencing decisions. It affirms that even amid human tragedy, the criminal justice system must remain anchored in rationality, proportionality, and the rule of law.

⁵ Indian Evidence Act, 1872, Section 106.

⁶ Code of Criminal Procedure, 1973, Section 293.