



2026 INSC 884

REPORTABLE
IN THE SUPREME COURT OF INDIA
CRIMINAL APPELLATE JURISDICTION

CRIMINAL APPEAL NO(S). OF 2026
(Arising out of SLP (Crl.) No (s). 18722-18773 of 2025)

KIRAN DESHMUKH **....APPELLANT(S)**

VERSUS

**THE STATE OF MADHYA
PRADESH AND ORS. ETC.RESPONDENT(S)**

ORDER

Mehta, J.

1. Heard.
2. Leave granted.
3. These appeals by special leave have been preferred by the appellant, Kiran (wife of deceased-Ravindra Deshmukh¹), assailing the judgment and

¹ Hereinafter, referred to as “deceased-Ravindra”.

order dated 11th July, 2025 passed by the High Court of Madhya Pradesh at Jabalpur² in Criminal Revision Nos. 2615 of 2025 and 2724 of 2025. By the impugned judgment, the High Court allowed the criminal revision petitions preferred by the accused-respondents, namely, Deepak Shivhare, Prakash Shivhare and Ranjeet Singh, against order dated 9th May, 2025 passed by the learned First Additional Sessions Judge, Betul, Madhya Pradesh and thereby discharged the said accused-respondents from the offences punishable under Section 108 read with Section 3(5) of the Bharatiya Nyaya Sanhita, 2023³.

BRIEF FACTS

4. The prosecution case, as emerging from the material placed on record, is that on 7th October, 2024, at about 7:50 a.m., deceased-Ravindra committed suicide by shooting himself with his country-made pistol at his residence. During the course of the inquest proceedings, a six-page suicide note was recovered from the pocket of the deceased-Ravindra.

² Hereinafter, referred to as “the High Court”.

³ Hereinafter, referred to as “BNS”.

5. In the suicide note, the deceased-Ravindra made omnibus allegations attributing responsibility for his death to, Ranjeet Singh, Prakash Shivhare, Deepak Shivhare, Pramod Gupta, Abhishek Sahu, Mohd. Naseem Raza, Shamim Raza, Nazia Bano, Karan Suryavanshi and Bhola Singh *alias* Ramnarayan Singh. The deceased-Ravindra alleged that he had been subjected to a sustained course of mental harassment, blackmail, intimidation and financial extortion, involving demands for payment aggregating to a substantial sum exceeding Rs.80,00,000/-. As per the allegations contained in the note, the episodes of so-called extortion and illegal demands commenced in December, 2023, when a purported missing person incident involving Abhishek Sahu was allegedly staged, followed by a complaint against the deceased-Ravindra, with the object of threatening his political career and tarnishing his reputation.

6. It was further alleged that, in order to prevent the aforesaid allegations from being publicised and to safeguard his reputation, the deceased-Ravindra was compelled to make several payments under threat and coercion. The amounts allegedly included

Rs.15,00,000/- paid to Abhishek Sahu, Rs.5,00,000/- to Shambhu Singh and Rs.10,00,000/- to Naseem Raza and his brother, besides further payments of Rs.8,00,000/- and Rs.6,00,000/- allegedly made to Karan Suryavanshi and Bhola Singh, respectively. The deceased-Ravindra further alleged in the suicide note that, upon his refusal to accede to a demand of Rs.50,00,000/- on 5th August, 2024, he was compelled to arrange funds by selling his wife's jewellery and borrowing money from acquaintances. It was alleged that, following another purportedly staged disappearance involving Naseem Raza, a further payment of Rs.40,00,000/- was made on 15th August, 2024.

7. On the basis of the suicide note, FIR No. 444 of 2024 came to be registered on 8th October, 2024. Upon completion of the investigation, a chargesheet was filed on 11th January, 2025. The learned First Additional Sessions Judge, Betul, *vide* order dated 9th May, 2025, upon consideration of the material on record, proceeded to frame charges against the accused-respondents and other accused persons for

the offences punishable under Section 108 read with Section 3(5) of the BNS.

8. Aggrieved thereby, the accused-respondents, namely, Deepak Shivhare, Prakash Shivhare and Ranjeet Singh preferred criminal revision petitions before the High Court.

9. By a common judgment dated 11th July, 2025, the High Court allowed these revision petitions and proceeded to set aside the order framing charge and discharged the accused-respondents. The High Court observed that the material placed on record did not disclose any act or omission on the part of the accused-respondents which could amount to instigation or intentional abetment to the deceased-Ravindra for commission of suicide. There was no material to establish that the accused-respondents had either received or derived any benefit from the alleged payments, or had themselves extended any direct or indirect threat to the deceased-Ravindra. Placing reliance upon the decisions of this Court in ***Mohit Singhal & Anr. v. State of Uttarakhand & Ors.***⁴, and ***Prakash & Ors. v. State of***

⁴ (2024) 1 SCC 417.

Maharashtra & Anr.⁵, the High Court held that the requisite *mens rea* and active participation necessary to constitute the offence of abetment of suicide were not *prima facie* made out. The High Court, accordingly, proceeded to discharge the accused-respondents from the offence punishable under Section 108 read with Section 3(5) of the BNS.

10. Aggrieved by the aforesaid judgment and order of the High Court, the appellant has approached this Court by way of appeal with special leave.

SUBMISSIONS ON BEHALF OF THE APPELLANT

11. Learned counsel appearing for the appellant submitted that the judgment and order passed by the High Court is legally unsustainable and liable to be set aside. It was contended that, at the stage of framing of charges, the Court is required to examine the material placed on record by the prosecution only for the purpose of determining whether the same discloses a ground to proceed against the accused. The Court, at such stage, is not expected to undertake a meticulous examination or appreciation of the evidence or conduct a hairsplitting exercise

⁵ (2026) 6 SCC 251.

into the merits of the case so as to determine the ultimate probability of conviction.

12. Learned counsel submitted that the High Court, while exercising revisional jurisdiction, travelled beyond the permissible scope of scrutiny by evaluating the defence of the accused-respondents and undertaking a detailed assessment of the evidentiary material at a preliminary stage of the proceedings. Such an exercise tantamounted to conducting a “mini-trial”, which is impermissible while considering the sustainability of an order framing charge in the revisional jurisdiction.

13. Learned counsel further submitted that the High Court fell into error in holding that the requisite proximity/live link between the alleged acts of the accused-respondents and the incident of suicide was absent merely because the last alleged transaction had taken place nearly two months prior to the commission of suicide. It was contended that the allegations in the suicide note, read as a whole, disclose a continuing course of extortion, intimidation, blackmail and mental harassment, and the effect of such sustained conduct could not have been assessed by isolating the last alleged payment

from the continuous series of acts attributed to the accused-respondents.

14. On these grounds, learned counsel for the appellant, implored the Court to set aside the impugned judgment and allow the appeals.

SUBMISSIONS ON BEHALF OF THE RESPONDENTS

15. Learned counsel appearing for respondent No.1- State of Madhya Pradesh supported the submissions advanced on behalf of the appellant and contended that, while examining the legality of the order framing charges, the High Court travelled beyond the permissible scope of scrutiny and proceeded to assess the material on record in a manner akin to conducting a “mini-trial”.

16. *Per contra*, learned counsel appearing for the accused-respondents vehemently and fervently opposed the submissions advanced on behalf of the appellant. He supported the impugned judgment contending that the present appeals are wholly misconceived, legally untenable and devoid of merit. It was submitted that the High Court, upon an *apropos* consideration of the material available on record, rightly exercised its revisional jurisdiction

and discharged the accused-respondents, and that no error or infirmity has been demonstrated in the impugned judgment so as to warrant interference in exercise of the jurisdiction of this Court under Article 136 of the Constitution of India.

17. Learned counsel further submitted that the essential ingredients of the offence of abetment to suicide, namely, the requisite *mens rea*, instigation and a proximate nexus between the alleged acts of the accused-respondents and the suicide by the deceased-Ravindra, are conspicuously absent from material collected during investigation and the report filed under Section 173(2) of the CrPC (corresponding Section 193(3)(i) of the Bharatiya Nagarik Suraksha Sanhita, 2023). It was contended that the mere naming of the accused-respondents in the suicide note, by itself, would not constitute the offence punishable under Section 108 of the BNS. The last alleged transaction took place on 15th August, 2024, i.e., nearly two months prior to the suicide committed by the deceased-Ravindra on 7th October, 2024, and that such temporal gap negates any proximate or causal nexus between the alleged acts attributed to

the accused-respondents and the deceased-Ravindra taking his own life.

18. In light of these submissions, learned counsel for the accused-respondents supported the impugned judgment and urged that the appeals, being devoid of merit, deserve to be dismissed.

ANALYSIS AND DISCUSSION

19. We have given our thoughtful consideration to the submissions advanced at the bar and have carefully perused the material available on record.

20. The offence of abetment of suicide necessarily postulates the existence of a live and proximate nexus between the acts of instigation or abetment attributed to the accused and the commission of suicide. Where the alleged prejudicial conduct has ceased a substantial period prior to the occurrence and there is no material indicating any intervening act of instigation, intimidation or harassment in close proximity to the culminating act, the requisite causal nexus between the alleged conduct and the act of suicide becomes difficult to sustain even at the threshold.

21. In the present case, the last specific act alleged against the accused-respondents is stated to have

occurred on 15th August, 2024, when the alleged payment of Rs.40,00,000/- was made, whereas the deceased-Ravindra committed suicide on 7th October, 2024. There is, thus, an interval of nearly two months between the last alleged act of harassment and the commission of suicide by the deceased-Ravindra. Significantly, the prosecution has not placed any material on record to indicate that, during this intervening period, the accused-respondents subjected the deceased-Ravindra to any further act of intimidation, extortion or harassment, or otherwise instigated or intentionally aided him in taking the extreme step of ending his own life. In such circumstances, the mere fact that the accused-respondents have been named in the suicide note, or the allegation that the deceased-Ravindra had allegedly been subjected to harassment on earlier occasions, cannot, by itself, establish the requisite proximate nexus with the commission of suicide.

22. The absence of any intervening act assumes significance in determining whether the alleged conduct of the accused-respondents continued to operate as a proximate cause of the suicide. The fact that the deceased-Ravindra ultimately took his own

life, by itself, cannot retrospectively convert every prior act of harassment or coercion into an act of abetment. In the absence of material disclosing any continuing course of conduct, fresh demand, threat, instigation or intentional attempt to harass the deceased-Ravindra in close proximity to the occurrence, the requisite *mens rea* and the causal nexus necessary to constitute abetment of suicide cannot be inferred merely from the antecedent allegations.

23. Another circumstance which merits consideration is that the deceased-Ravindra did not make any complaint to the police or seek any form of legal or other redressal or intervention in respect of alleged acts of blackmail, intimidation and extortion. The material on record does not furnish any explanation as to why the deceased-Ravindra refrained from reporting the alleged acts attributed to the accused-respondents and remained silent in that regard. While this circumstance, by itself, may not be determinative, it assumes significance in examining whether the alleged conduct of the accused-respondents continued to have any discernible bearing upon the mental state of the deceased-

Ravindra and bore a proximate nexus with his decision to take the extreme step. The suicide note refers to payment of large sums of money by the deceased-Ravindra to different accused persons on different dates under the threat of false implication. The allegations *prima facie* appear to be fanciful and conjectural rather than having any pith or substance in them. Surprisingly, the investigating agency made no effort whatsoever to confirm or verify the foundational truth of these allegations and even did not care to ascertain whether the deceased-Ravindra had the capability to pay the huge sums of money referred to in the suicide note.

24. We are of the view that the allegations contained in the suicide note, even if accepted in their entirety, are vague, omnibus and conspicuously devoid of any material particulars. The note fails to attribute any specific act, or omission to the accused-respondents which could amount to instigation, aid or intentional assistance in the commission of suicide. Significantly, the allegations do not disclose any proximate or discernible nexus between the conduct attributed to the accused-respondents and the deceased-Ravindra taking the extreme step. Tested

against these surrounding circumstances, the allegations are not only bereft of the foundational facts necessary to sustain the charge of abetment of suicide, but also appear inherently improbable. In such circumstances, a mere reference to the names of the accused-respondents in the suicide note, without anything further to substantiate the allegations, cannot furnish a legally sustainable basis to *prima facie* attribute the offence of abetment of suicide to them.

25. The aforesaid circumstances, when considered cumulatively, lead to the conclusion that the material on record, even if accepted at its highest, does not disclose the essential ingredients of the offence punishable under Section 108 of the BNS against the accused-respondents. The High Court, therefore, cannot be said to have committed any error in interfering with the order framing charges and discharging the accused-respondents.

26. As an upshot of the above discussion, we find no infirmity in the impugned judgment warranting interference of this Court under Article 136 of the Constitution of India. Accordingly, the judgment and order dated 11th July, 2025 rendered by the High

Court is affirmed. The appeals lack merit and are dismissed as such.

27. Pending application(s), if any, shall stand disposed of.

.....**J.**
(SANDEEP MEHTA)

.....**J.**
(MANMOHAN)

NEW DELHI;
AUGUST 11, 2026.