
A CRITICAL STUDY ON CAPITAL PUNISHMENT IN INDIA

M. Sangeetha, BA.LLB (HONS), Saveetha School of Law, Saveetha School of Medical and Technical Sciences
(SIMATS)

ABSTRACT

This study identifies capital punishment as a component which manipulates youngsters to know about Death penalty is considered one of the most debated, ancient types of punishment in almost each society observed inside the particular areas of the metropolis of Chennai, Madurai. Data turned into collected by way of the usage of on-line interview techniques so that accurate and authentic information from the concerned people ought to be collected. This take a look at, however, gives out some new findings concerning Do you guide capital punishment in India? How do you rate that the implementation of capital punishment in India violates the reformatory theory? The best manner to measure attachment to capital punishment among people of all ages is to appearance at the percentage of folks who become aware of with a laws and group. Death penalty thought to be awarded simplest in special case asking human beings approximately their views on capital punishment Death Penalty shall be handled as terrific punishment which will handiest be imposed on special reason. Accused has right of hearing, Individualisation of sentence need to be present thinking about individual circumstances. Questions Designed consistent with To save cost and time and to preserve the cooperation and goodwill of the respondents; the questions had been kept easy and straight to the point. The research has followed the empirical research with convenience samplings methods. The sample size 200 .

Keywords: capital punishment, implementation, Accused, judgements, violations.

Introduction

Capital Punishment is also known as a loss of life penalty, execution of an culprit sentenced to demise after conviction of a criminal offence with the aid of a court docket of law. Indian Criminal justice device is one of the crucial parts of capital punishment. India retained the 1861 Penal Code at independence in 1947, which furnished for the dying penalty for murder. The idea of abolishing the demise penalty expressed through numerous members of the Constituent Assembly at some point of the drafting of the Indian Constitution between 1947 and 1949, however no such provision became incorporated within the Constitution. In the subsequent two decades, to abolish the dying penalty, private participants payments had been brought in each Lok Sabha and Rajya Sabha, but none of them were adopted. It become predicted that between 1950 and 1980, there had been 3000 to 4000 executions. It is more difficult to degree the wide variety of humans sentenced to loss of life and completed between 1980 and the mid-1990s. It is envisioned that or 3 people had been hanged annually. In the 1980 Bachan Singh judgment, the Supreme Court dominated that the demise penalty should simplest be used within the "rarest of rare" instances, however it is not clear what defines the rarest of the rare. In colonial India, demise turned into prescribed as one of the punishments within the Indian Penal Code, 1860 (IPC), which listed some of capital crimes. It remained in impact after independence in 1947. The first striking in Independent India was that of Nathuram Godse and Narayan Apte in the Mahatma Gandhi assassination case on 15 November 1949. Under Article 21 of the Constitution of India, no individual may be deprived of his life besides according to technique mounted by way of law. Ninety consistent with cent of the states have supported maintaining loss of life penalty in the country, the authorities informed the Rajya Sabha on Friday where a personal member's invoice in search of abolition of capital punishment came up for consideration. Responding to the debate, Minister of State for Home G Kishan Reddy said the authorities is examining the difficulty and is but to take a final call. In August 2015, the Law Commission had advocated abolition of loss of life penalties except in cases of terrorism and waging warfare towards India. Since, the matter falls in the concurrent listing of the charter, the centre had sought the opinion of states in October 2015.

After numerous reminders, 14 states and 5 Union Territories responded. "90 in step with cent need to preserve demise penalty except one state," Reddy said. No society wants to kill a individual, however on the other facet there are a few heinous crimes like Nirbhaya also within the identical society, the minister said. "The authorities is seized of the matter and is inspecting

this issue. It may also take a view on the report after accomplishing a extensive consensus in this matter," stated Reddy. Over concerns that during a few instances harmless and poor human beings could be wrongly convicted, the minister advised the Members stated that the country's charter has provided several tiers of steps to guard the innocents. "If a trial court awards capital punishment, then it may be appealed earlier than the High Court after which governor of states.

In 1971 the United Nations General Assembly passed a choice that, "so as absolutely to guarantee the proper to life, supplied for in...the Universal Declaration of Human Rights," referred to as for proscribing the huge sort of offenses for which the demise penalty may be imposed, with a view toward abolishing it altogether. This decision modified into reaffirmed through the General Assembly in 1977. In the 1990s many African worldwide places—including Angola, Djibouti, Mozambique, and Namibia—abolished capital punishment, despite the fact that maximum African worldwide places retained it. In South Africa, which formerly had one of the world's maximum execution rates, capital punishment was outlawed in 1995 thru the Constitutional Court, which declared that it come to be incompatible with the prohibition toward cruel, inhuman, or degrading punishment and with "a human rights culture." Supporters of the demise penalty recall that people who devote murder, because of the truth they have got taken the life of another, have forfeited their personal proper to life. Furthermore, they recall, capital punishment is a simply shape of retribution, expressing and reinforcing the ethical indignation now no longer handiest of the victim's family however of law-abiding citizens in general. By contrast, fighters of capital punishment, following the writings of Cesare Beccaria (in particular *On Crimes and Punishments* [1764]) argue that, thru legitimizing the very behaviour that the law seeks to repress—killing—capital punishment is counterproductive withinside the ethical message it conveys. Moreover, they urge, while it's far used for lesser crimes, capital punishment is immoral because of the truth it's miles very well disproportionate to the damage done.

Abolitionists additionally claim that capital punishment violates the condemned person's proper to life and is essentially inhuman and degrading. Although dying modified into prescribed for crimes in plenty of sacred religious files and traditionally became practiced widely with the assist of religious hierarchies, nowadays there can be no agreement amongst spiritual faiths, or among denominations or sects inside them, on the morality of capital punishment. Beginning withinside the final half of the 20th century, growing numbers of religious leaders—in particular internal Judaism and Roman Catholicism—campaigned in

competition to it. Capital punishment have become abolished with the resource of the dominion of Israel for all offenses except treason and crimes in competition to humanity, and Pope John Paul II condemned it as “cruel and unnecessary. ”To evaluate approximately the capital punishment in India.

Objectives

- To know about capital punishment.
- To know about advantage of capital punishment.
- To analyse capital punishment is morally right.
- To know about execution of an offender.

Literature review

Dr. Vimal R. Parmar 2015 The above mentioned quote can quite easily imply that where exactly the phrase “Draconian Laws and Methods” originated. Barbarism has always been the root of ancient man and some even argue that somehow, that still has not been lost, evidently on account of the death penalty. In the history of punishment, capital punishment has always occupied a very important place. In ancient times, and even in the middle ages, sentencing offenders to death was a very common kind of punishment. Even what might be considered as minor offences in modern criminal law attracted the death penalty in those days. In England, there was a time when there were as many as 200 felonies for which the punishment was the death penalty.(Gupta 1986)

Akanksha Madaan 2020 Death penalty is one of the most debated, ancient forms of punishment in almost every society. Awarding capital punishment on rarest of rare cases includes a lot of controversies in different judgements. The intent of study is to find out that awarding such type of punishment in rarest of rare case is just and fair? also have to identify on what basis our judiciary use to term a particular criminal act in rarest of rare case. The study for the research adapted is qualitative based on the decisions of different cases related to brutal acts.(Bhan 2010)

Shivani 2020 The Death penalty is one of the most controversial topics of the Indian judiciary. It exists from the ancient periods and still prevailing in some major countries, India is one of

them. In India, death punishment is given only in Rarest of the rare cases but what is the exact meaning of the phrase 'Rarest of the rare cases?' has caused much controversy. The ultimate aim to give punishment anywhere is to reduce the crime and to impose some penalty on the offender. The Death sentence is the killing of an offender in the name of justice. India follows the same phenomenon but as per the Indian constitution, it is the violation of the provisions of right to life and dignity provided in Art. 21, still it is constitutionally valid.(Anandavenu et al. 2019)

S.R Muralivasan Human 2020 life place a great role in the society because of its importance where it paves a way to lot of emotions and attachments in cycle of nature. That could be a reason why human life is important in this eternal world which makes different from other living creatures in the world. Death penalty can be simply referred in simple sense, where it where the life of a person is taken by the State by following the due procedure of law for the grave offence, which the person has committed. But this death penalty is not new to this contemporary world, where it got its existence from ancient time, which stands to be immortal. It was practiced in all centuries of human life society. This 21st century has made something special , where it openly confesses that time has come for abolishment of death penalty, by making up satisfactory opinions and arguments and posing certain conditions on which death penalty should be imposed.(Kumari and Kumari, n.d.)

(Shivam Dubey and Pooja Agarwal 2020) Capital punishment is a highly debated matter. It is legal but rarely voted for in India. Imposition of the penalty is not always followed by, because of the possibility of commutation to life imprisonment. Since 1995, it has been used only four times on Auto Shankar in 1995, Dhananjay Chatterjee in 2004, Ajmal Kasab in 2012 and Afzal Guru in 2013. Although there are numerous countries that proscribe death sentences, there is no international consensus till date regarding its legality. The Indian legal system too has struggled with the constitutionality of death penalty and the circumstances in which it may be granted. This paper analyses the constitutional validity of death sentence and the circumstances under which it may be granted with the help of relevant cases and the 'rarest of the rare' test that was prescribed by Supreme Court in Bachan Singh case. This paper concludes by observing that Indian judiciary is moving away from the implementation of capital punishment as there is greater emphasis on alternative modes of punishment and the international legal developments which are against the capital punishment.(Phillips 2009)

Swagata Yadavar 2020 ,On February 1, India may witness its first death penalty in five years as the four men convicted for the December 2012 rape and murder of Jyoti Singh, or 'Nirbhaya', are hanged as per a warrant issued by a Delhi sessions court. President Ram Nath Kovind had earlier rejected a mercy petition filed by one of the convicts. India has carried out only four executions since 2004, the last having been in 2015. Three of the accused were convicted of terrorism while one was convicted for raping a minor. (Gandhi 2016)

Priyanka 2017 India is a well developing country at the same time lots of crime rates were increasing nowadays. There are lots of legislation in India to stop and control crimes, even though the crime rates are increasing because the punishments are not sufficient for the crimes. The punishment should be severe to reduce the crime rate. All punishments are based on the same motive to give penalty for the wrongdoer. There are different kinds of punishment in India such as capital punishment, life imprisonment, imprisonment etc (Hood and Deva 2013)

Rukmani 2020 The four convicts in the 2012 Delhi gangrape case could be hanged on February. This will be the first time in 5 years a death penalty will be carried out in India and puts a spotlight on courts handing out capital punishment for murders involving sexual violence. ("Proponents of Capital Punishment" 2017)

Monika 2019 Through the passing centuries, we have seen the rise and fall of various dynasties but the only thing common between them was their use of death penalty as a means of administering justice. If we look at the time of the Mauryan Dynasty, the principal followed to punish a person was an eye for an eye, a hand for a hand, etc. The later dynasties followed different types of punishments such as dragging the body by a horse, cutting of head or any body part, stamping by an elephant which was very brutal in nature. In the world perspective, the criminal laws regarding death penalty were first codified by King Hammurabi of Babylon. There were other forms of death penalty. (Barzun 2017)

Taran Deol 2020 The four convicts in the 2012 Delhi gang rape and murder case are set to be hanged together at 5.30 am Friday, more than seven years after the gruesome incident stunned the country and provoked street protests demanding justice. This is the first time that four convicts will be hanged together on the same platform. The last death sentence executed by the justice system in India was the 30 July 2015 hanging of terrorist Yakub Memon, who was convicted in the 1993 Mumbai blasts. Of the six men convicted in the Delhi gang rape and

murder case, Ram Singh allegedly committed suicide on 11 March 2013 in Tihar jail. Another convict, a minor at the time the crime was committed, was released after three years at a reform home.(Yost 2019)

Prakash Rao 2018Parliament had last year expanded the scope of death penalty by introducing it in cases of rape of girls below 12 years under Protection of Children from Sexual Offences (POCSO).As per Project 39A report on death penalty, released by National Law University, Delhi, between 2000 and 2014 trial courts sentenced 1,810 people to death, more than half of which were commuted to life imprisonment and about a quarter of those, 443, were acquitted by the Supreme Court and high courts.The Supreme Court had upheld the death sentence of 73 of these prisoners, out of which many had already spent a decade on death row.(Scherdin 2016)

Ravi kumar 2015The Death Penalty Research Project is an attempt to answer questions concerning the socio-economic profile of prisoners sentenced to death in India along with enquiring into the manner in which they are sentenced to death. Through personal interviews with prisoners and their families, the aim was to focus on aspects of the death penalty that have received very little attention in India and explore new fronts for discussion beyond analysis of Supreme Court judgments. This Report must be read in the context of our position that the death penalty is a unique punishment. The every-day uncertainty between life and death sets capital punishment apart from imprisonment of any other kind.(Indian Law Commission 1967)

K. G. Kannabiran 2008The sentence of death awarded to Saddam Hussein, the former President of Iraq by an interim Iraqi Government still under the supervision of US and allied forces was, like all judicial sentences of death, pure and simple pre-meditated judicial assassination. While political trials with international ramifications are a special case, it remains absolutely essential to contest the validity of all death sentences as a form of punishment. It is also important to recognise that the extent of power enjoyed by a state (and the extent of its fear of dissent) determines the character and conduct of state institutions entrusted with dispensing justice and thereby the harshness of punishments meted out.(Kramer 2014)

Prasanth singh 2019Following the Supreme Court's dismissal of review petitions by all four convicts in the Nirbhaya rape and murder case, the four have moved one step closer to the gallows. In the light of this, and the repeated demands to punish all rape convicts with the death penalty, it becomes important to examine empirical evidence on the topic.(Kumar 2019)

KALEESWARAM RAJ 2020In an essay written in the Yale Law Journal in 1989, scholar Paul Whitlock Cobb Jr. discussed the significance of mercy in death penalty. He talked about various facets of compassion. However, he lamented that “mercy, which encompasses the discretion of decision-makers at every stage of the death penalty process, has been eroded by politics and an increasingly bureaucratised capital punishment system”.(Sampath Kumar 2003)

Ramadoss 2015All punishment are based on the same proposition that is there must be a penalty for wrongdoing. Most systems of religion or ethics teach that bad action lead to bad consequence. There are two main reason for inflicting punishment on wrongdoers discourage others from doing wrong. The death penalty also rests on the same proposition as other punishment. Because of its drastic and irrevocable nature, It is even more open to debate over its fairness, appropriateness and effectiveness than other punishments. The proponents of death penalty believe that it is an effective way to stop crime. They focus on the death penalty as a deterrent or something that will stop or lesson crime. They believe that the death penalty brings the most justice to the victim of a heinous crime.(Powe 2018)

Nisha Sharma 2020The Criminal laws were made more stringent, when in the year 2013 the Indian Penal Code, 1860 stood amended and Section 376A was inserted which enunciates death penalty for the offence of rape resulting into persisted vegetative state of victim or death. The amendment was caused pursuant to the suggestions recommended by the Judicial Committee formed by the Central Government to provide suggestions to "severely" deal with sexual assaults against women which is visibly an aftermath of vicious gang rape and murder of a 25 year old in Delhi in 2012.(Hochkammer 2017)

Hartman 2017The National Law University’s Death Penalty Research Project has prepared a socio-economic profile of prisoners sentenced to death in India, using statistics and case studies, to help create a resource for an in-depth understanding of the administration of the death penalty in India.Over the period July 2013 to January 2015, the Project was able to interview most prisoners on death row, and their families. There are no reliable numbers of the total number of death row prisoners in India. There is also no official record with any Ministry or agency of the total number of prisoners executed since Independence.(Gerstein 2017)

Mayank Shekar 2020 This article titled “A Critical Analysis of the Law of Capital Punishment in India” delves upon the various facets of Capital Punishment and examines the idea of punishment. Since time immemorial, nature has had some laws that are considered eternal.

These natural laws, though static in nature, got their dynamism from human beings. As human society started taking shape, the anti-social elements also evolved with time.(Evjen 2017)

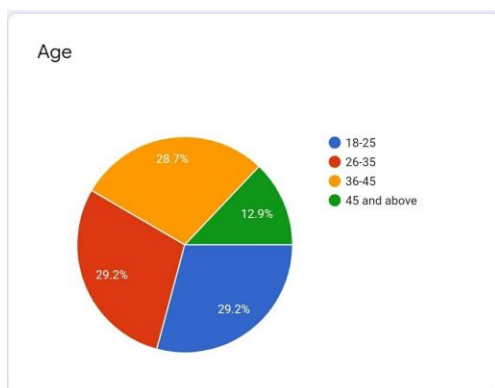
Lawrence 2020This book systematically investigates the capital punishment of girls and women in one jurisdiction in the United States during nearly four centuries. Using Connecticut as an essential case study, due to its long history as a colony and a state, this study is the first of its kind not only for New England but for the United States. The author uses rich archival sources to look critically at the gendered differential in the application of the death penalty from the seventeenth century until the abolition of capital punishment in Connecticut in 2012.(Mohapatra 2016)

Methods and Materials :

The researcher obtained the primary source of data by conducting an empirical study on seeking responses from the general public based on a questionnaire and also relied on secondary sources of data such as books, journals, e-sources, articles and newspapers. The research method followed here is empirical research. A total of 200 samples have been taken out of which is taken through convenient sampling methods. The sample frames taken by the researcher are various students and their parents especially belonging to the rural parts of Madurai, Chennai. The independent variables are age, gender and occupation. The dependent variables are that,Do you support capital punishment in india,How do you rate that the implementation of capital punishment in india violates the reformative theory.

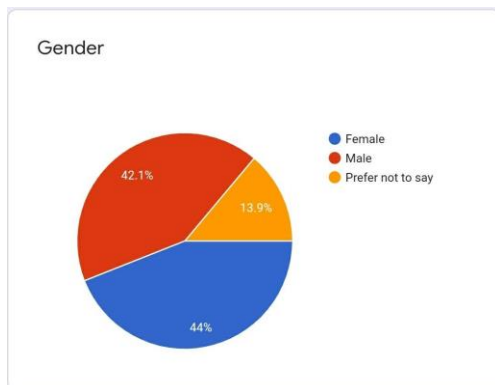
Analysis and Discussion :

AGE FREQUENCY :



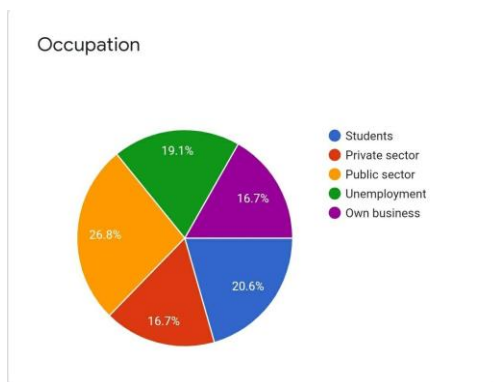
With respect to the current survey results, the frequency table is created out of the survey responses received from several people. The present frequency table is based on age of the persons. Among the persons who are between 18-25, there were 29.2% sample responses taken and between the 26-35, there were about 29.2% sample responses taken. Between those who were between 36-45 there were 28.7% sample responses taken and between those who are 45 & above , there were 12.9% sample responses for this survey. Thus, on the whole there were about 200 samples taken for the present survey.

GENDER FREQUENCY :



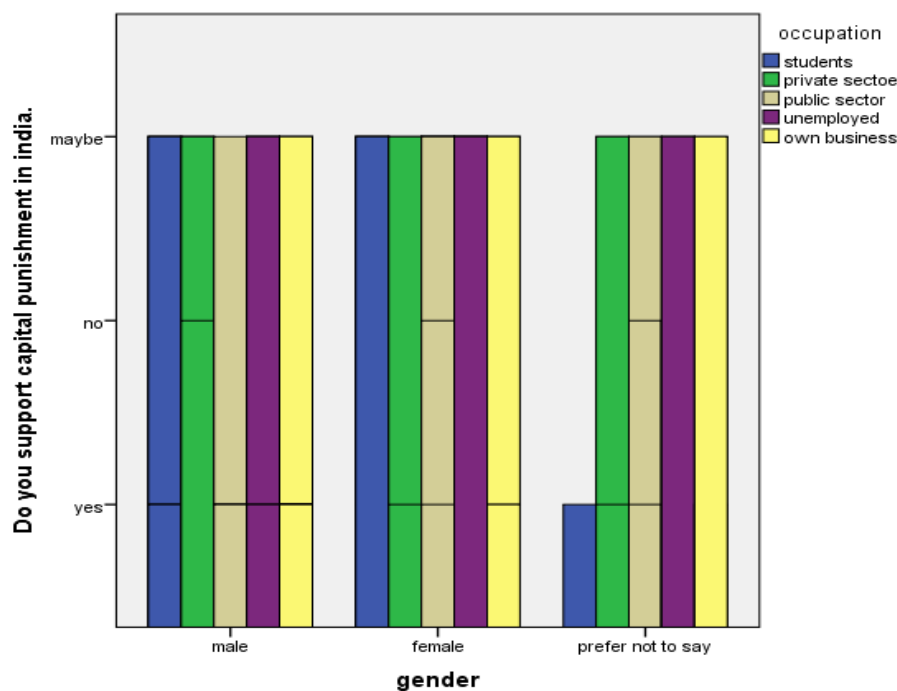
With respect to the current survey results, the frequency table is created out of the survey responses received from several people. The present frequency table is based on gender of persons who were taken as samples. Among the samples, the number of female responses are comparatively more when compared to the number of responses by male samples. Where the sample response from female person is 44% and the response from male is 42.1% in number and the sample response from people not prefer to say are 13.9% in number. Thus, on the whole there were about 200 samples taken for the present survey.

OCCUPATION FREQUENCY :



With respect to the current survey results, the frequency table is created out of the survey responses received from several people. The present frequency table is based on occupation of the persons. Among the persons who are students, there were 20.6% sample responses taken and among the public sector , there were about 26.8% sample responses taken. Among those who have a private sector there were 16.7% sample responses taken and among those who have their own business , there were 16.7% sample responses taken and among those who are unemployed , there were 19.1% sample responses for this survey. Thus, on the whole there were about 200 samples taken for the present survey.

Question 1 :



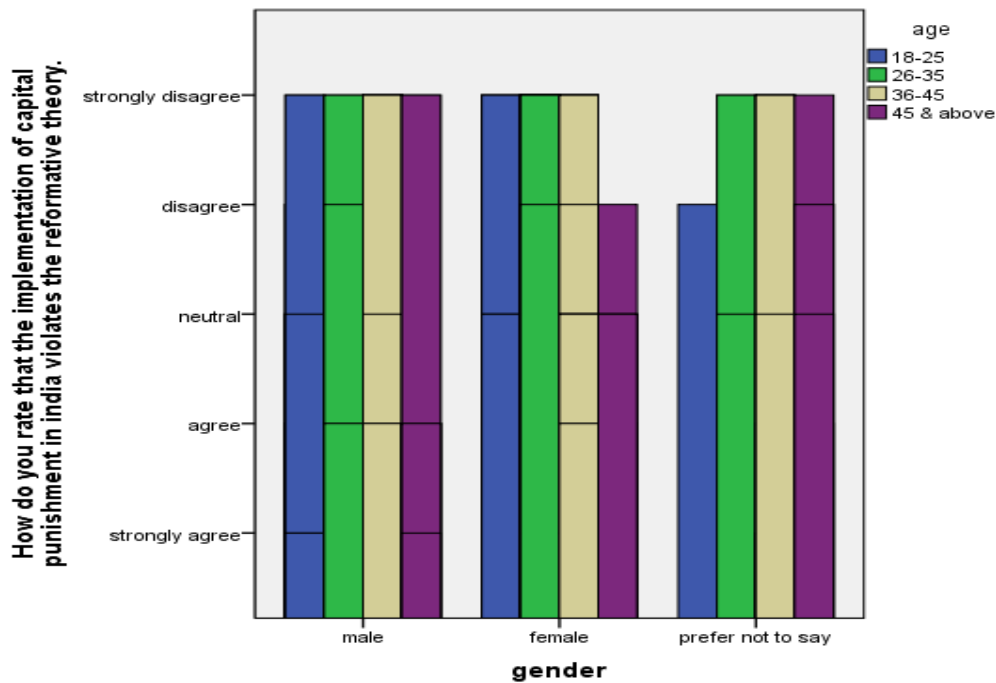
Legend :

From the graph, it is observed that it exhibits the occupational distribution of the respondents among different genders of the respondents and their opinion on Do you support capital punishment in India.

Results :From the survey : in graph 1,it is observed that it exhibits the occupational distribution of the respondents among different genders of the respondents and their opinion on Do you

support capital punishment in India. The maximum number of responses were collected from Male and female respondents who are students, workers of public and private sectors and daily workers.

Question 2:



Legend :

From the graph 2, it is observed that it exhibits the age distribution of the respondents among different genders of the respondents and their opinion on How do you rate that the implementation of capital punishment in india violates the reformatory theory.

Results :

From the survey : in graph 2, it is observed that it exhibits the age distribution of the respondents among different genders of the respondents and their opinion on How do you rate that the implementation of capital punishment in india violates the reformatory theory. The maximum number of responses were collected from both the male and female respondents who are between age groups of 18-25 and 26-35.

Discussion

The study says that Proper law have to be laid down in Many statues provide awarding of Capital Punishment. As it became determined that there had been many laws present for awarding demise penalty however nobody use to offer the grounds under which such punishment have to be penalized in rarest of uncommon case, which in end result creates quite a few confusion in the thoughts of jurist that on what floor the equal punishment must be presented to the accused. Decision must be inquisitive about due cares India is a democratic country where public at large selection prevails. The guardians of charter has discretionary energy to award the death penalty by following the precedent choices of constitutional court, however it turned into encouraged that at the same time as awarding the capital punishment the Jurist ought to keep in mind that even though the accused has dedicated brutal act but if there are a few percent situations indicating that the accused will no longer going to damage the society, on this floor he must now not be provided with dying penalty and this could be determined via his past behaviour inside the society before committing crime. Death Penalty have to now not be not on time after its pronouncement In *Triveni Bai v. State of Gujarat* SC held that loss of life penalty execution ought to be delayed on reasonable grounds, in order that the accused may get truthful trial. But here the researcher advise that the jury shall now not delay the demise penalty after its pronouncement and this method must be abolished via enforcing the obligation on the constitutional guardians to properly examine the act relating to the offence so that the accused may also have honest trial and after analyzing best the Jurist need to pronounce the demise penalty which must no longer be not on time. Here the researcher does not mean that the accused should now not get the proper to appeal however that right must be supplied for a specific period. No age limit ought to be prescribed for awarding of death penalty In our us of a no law permit to award dying penalty to the juvenile however if any juvenile commits heinous crime like rape, murder etc which falls below the category of rarest of rare case it manner that even as committing the offence he has enough quantity of know-how for the act he changed into committing and on this floor he need to be offered with capital punishment.

Conclusion

After the study, the researcher humbly submitting some suggestions regarding death penalty before the law commission which was found lacking in judiciary.

Capital punishment which is visible as a cruel and inhuman in some jurisdictions is constitutional in India and a few different international locations, and the proper to existence and human dignity as furnished by using the Indian Constitution does no longer prevent an offender from being completed if determined guilty of sure crimes by using a Court of capable Jurisdiction. In different phrases the same charter that has provided for these rights has also furnished death as a penalty for sure criminal offences. In India the difficulty of demise sentence is hotly debated and has attracted the attention of preferred public in addition to authorities and non-governmental organisations. Though India is an active member of the United Nations and has signed and ratified most of the International Instruments on human rights, capital punishment still remains in our statute book. According to our judiciary it need to be imposed in notable instances i.E. In rarest of uncommon cases with special reasons.

India is a nation of different culture, different kinds of people having their different manner of thinking and living. The acts of crimes aren't the trend of contemporary area however it has taken the region from ancient period. Though in ancient period demise punishment use to award on small offences however the handiest logic behind it to save the general public at large and create horror in their minds so they prevent doing crime from the worry of capital punishment. As the time changes many countries abolished the dying penalty. Our united states of america did not abolish loss of life penalty; the simplest reason is public at large.

Death penalty in rarest of uncommon case does now not affect the human rights standards. As per the guidelines supplied in ICCPR for those international locations which does not need to abolish it says that one can also award capital punishment however must follow positive conditions. Delhi Gang rape which turned into termed to be as the most brutal case in history, where because of this united states gathered collectively and demanding justice for the female Damini also annoying to save the future of nation. This revolution opened the eyes of judiciary and that they amended the crook law. According to the deterrent idea implementing the cruel punishment will create fear and desist from criminal behaviour a good way to help to lower the crime rates. In India deterrence principle has its existence. The scene of rarest of rare case to award loss of life penalty in India got here from the *Macchi Singh v. State of Punjab* case wherein on the demand of public at large the accused turned into provided with dying penalty and SC laid down a few principles to judge whether or not the act comes under rarest of uncommon case or now not. The judiciary has discretionary energy to decide that one have to be sentenced with the dying penalty or no longer but via following the guidelines furnished in

Macchi Singh Case . Thereafter in Bachan Singh Case the SC laid down two inquiries to decide the gravity of case which says how uncommon the crime is and does the occasions of crime showing the brutality of the case to award with death punishment.

Reference:

1. Anandavenu, V., School of Law Sastra University, Thiruvannamipur Tamil Nadu, and India. 2019. "Capital Punishment." *International Journal of Trend in Scientific Research and Development*. <https://doi.org/10.31142/ijtsrd21352>.
2. Barzun, Jacques. 2017. "In Favor of Capital Punishment." *Capital Punishment*. <https://doi.org/10.4324/9781315081809-8>.
3. Bhan, Anant. 2010. "Death Penalty to Kasab: Time to Revisit the Role of Health Professionals in Capital Punishment in India." *The National Medical Journal of India* 23 (3): 187.
4. Evjen, Victor H. 2017. "Let's Abolish Capital Punishment." *Capital Punishment*. <https://doi.org/10.4324/9781315081809-19>.
5. Gandhi, Gopal. 2016. *Abolishing the Death Penalty: Why India Should Say No to Capital Punishment*. Rupa Publications.
6. Gerstein, Richard E. 2017. "A Prosecutor Looks at Capital Punishment." *Capital Punishment*. <https://doi.org/10.4324/9781315081809-11>.
7. Gupta, Subhash C. 1986. *Capital Punishment in India*.
8. Hochkammer, William O. 2017. "The Capital Punishment Controversy." *Capital Punishment*. <https://doi.org/10.4324/9781315081809-6>.
9. Hood, Roger, and Surya Deva. 2013. *Confronting Capital Punishment in Asia: Human Rights, Politics and Public Opinion*. Oxford University Press.
- Indian Law Commission. 1967. *Capital Punishment: 35th Report*.
10. Kramer, Matthew. 2014. *The Ethics of Capital Punishment: A Philosophical Investigation of Evil and Its Consequences*. Oxford University Press (UK).
11. Kumari, Dr Areti Krishna, and Areti Krishna Kumari. n.d. "Capital Punishment and Statutory Frame Work in India." *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.1015473>.

12. Kumar, Raman. 2019. "Death of a Doctor - Ek Doctor Ki Maut-Time to Boost the Ailing and Failing Public Health System in India." *Journal of Family Medicine and Primary Care* 8 (12): 3771–72.
13. Mohapatra, Bijoy Chandra, and Sudhansu Ranjan Mohapatra. 2016. *Capital Punishment in India*.
14. Phillips, Scott. 2009. "Status Disparities in the Capital of Capital Punishment." *Law & Society Review*. <https://doi.org/10.1111/j.1540-5893.2009.00389.x>.
15. Powe, Lucas A. 2018. "Capital Punishment." *America's Lone Star Constitution*. <https://doi.org/10.1525/california/9780520297807.003.0013>.
16. "Proponents of Capital Punishment." 2017. *Capital Punishment*. <https://doi.org/10.4324/9781315081809-7>.
17. Sampath Kumar, A. 2003. "Medical Resources and Capital Punishment."
18. "The Journal of Thoracic and Cardiovascular Surgery"
19. Scherdin, Lill. 2016. *Capital Punishment: A Hazard to a Sustainable Criminal Justice System?* Routledge.
20. Yost, Benjamin S. 2019. "Against Capital Punishment." <https://doi.org/10.1093/oso/9780190901165.001.0001>.