CASE ANALYSIS

India’s Supreme Court Acquits Prabhu Singh Over Conflict in Murder Evidence

Eyewitnesses described a gunshot injury and the autopsy doctor found no firearm wound. The Court held that the unexplained conflict, together with gaps in the investigation, created reasonable doubt.

By Shahbaz Shah · 26 November 2026

Prabhu Singh v. State of Uttar Pradesh · 2026 INSC 1266

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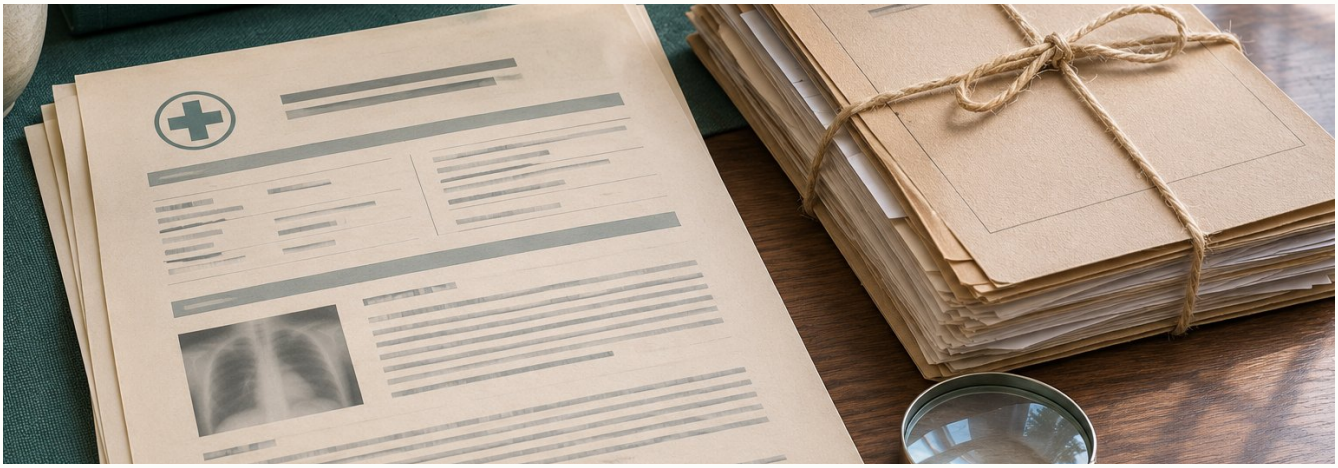

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Two witnesses said they saw a shot strike Gajram Singh in the forehead. The doctor who examined him found no firearm injury and gave a different account of the cause of death. India’s Supreme Court held that the prosecution had failed to resolve the conflict and set aside Prabhu Singh’s conviction under Section 302 read with Section 34 of the Indian Penal Code. Paragraphs 2–5 and paragraphs 10–12.

What the courts below accepted

The prosecution alleged that one man shot Gajram Singh and that Prabhu Singh and a third man then attacked him. The trial court treated the testimony of the deceased’s wife and daughter as reliable and concluded that the forehead wound could have been caused by a shot. The Allahabad High Court affirmed the conviction. The trial court and the High Court drew that inference despite the medical officer’s evidence and without an explanation from him supporting it. Paragraphs 3–8.

When medical evidence creates reasonable doubt

The Supreme Court said a credible eyewitness account can survive an inconsistency with medical evidence if the difference can reasonably be explained. The conflict here went to the prosecution's account of how the assault occurred. The autopsy doctor found no entry or exit wound. The prosecution put forward no matching projectile and did not seek the necessary explanation from the doctor about the forehead wound. The judges held that the courts below could not supply their own medical explanation to bridge that gap. Paragraphs 7–10.

That conflict was part of a larger evidentiary problem. Another potential eyewitness was not examined, the weapons were not recovered and the alleged third assailant was never identified. On the record as a whole, the bench found a reasonable doubt about Prabhu Singh's participation. It set aside the trial and High Court judgments against him and directed his immediate release if he was required in no other case. Paragraphs 10–12.

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Frequently asked questions

Is medical evidence always stronger than eyewitness evidence?

The Court said that an explainable inconsistency need not displace reliable eyewitness testimony. An irreconcilable conflict on a material fact can create reasonable doubt. Paragraph 7.

What explanation was missing in this case?

The doctor found no firearm wound. The prosecution did not elicit an explanation from him that reconciled that finding with the witnesses' account of a shot striking the deceased. Paragraph 8.

Why did the Court consider the investigation as well?

The missing weapons, unexamined witness and unidentified alleged assailant mattered when the bench assessed whether the prosecution had proved Singh's participation. Paragraph 10.

What was the final result?

The Court allowed the appeal, set aside Singh's murder conviction and directed his release unless he was required in another case. Paragraphs 11–12.