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A Study of Direct Evidence and Circumstantial Evidence with Special Reference to Aarushi Talwar Case

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ABSTRACT

The paper titled 'A study of direct evidence and circumstantial evidence with special reference to the Aarushi Talwar case' gives the insights of the meaning and application of the direct evidence and the circumstantial evidence which is also known as indirect evidence. Direct evidence can be considered as the testimony that goes directly to any particular point of question and proves that if that is assumed without any kind of deductive logic or inference. For example an eye witness of a murder can be considered as direct evidence. Circumstantial evidence refers to a situation when a witness cannot inform you directly of the fact, the fact that has to be proven. Instead of giving any direct information the witness gives some proofs of certain facts which can help to drive the fact finder on the basis of some rational conclusion. This can help to prove the claim that is supposed to be proven. The objective of the research paper is to analyze the different aspects of the direct evidence and the circumstantial evidence and to check how in different cases they evidences are applied to arrive at the conclusion of the case and the conviction of the accused. The paper also focuses on the Aarushi Talwar case which is a landmark case in which the conviction happened on the basis of the circumstantial evidences in the absence of the direct evidence. The paper also discusses in what conditions if there is an absence of any direct evidence and only circumstantial evidences are available in relation to the case the conviction can be done based on circumstantial evidences solely. In the conclusion the paper states that direct evidence and the circumstances are applied by the courts according to the facts and the circumstances of each case.

Keywords- Evidence, direct evidence, circumstantial evidence, reliability, Aarushi Talwar case.

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I. INTRODUCTION

According to the section 3 of the Indian evidence act, evidence is the statements that the courts require or permits to be made before the witnesses that are in relation to matters of facts under inquiry. The evidence also includes all the documents also the electronic records that are created for the review by the court.

Evidence is of two types- direct evidence and indirect evidence.

Direct evidence can be considered as the testimony that goes directly to any particular point of question and proves that if that is assumed without any kind of deductive logic or inference. For example an eye witness of a murder can be considered as direct evidence².

A witness admitting to a direct recollection of the events can be considered as direct evidence. This can include things such as what the witness has noticed with their senses, what the witness has heard. In any direct evidence generally a witness relates what he or she has directly experienced. An example can be if any person saw some other person shooting someone then this can be considered as direct evidence.

Circumstantial evidence refers to a situation when a witness cannot inform you directly of the fact, the fact that has to be proven. Instead of giving any direct information the witness gives some proofs of certain facts which can help to drive the fact finder on the basis of some rational conclusion. This can help to prove the claim that is supposed to be proven³.

The definition of the circumstantial evidence has been developed through interplay between the various statutes and various judicial interpretations. Circumstantial evidence is also known as the indirect evidence. Circumstantial evidence can be considered as an unrelated chain of events. The events when all of them are put together then that can lead to the conclusion that the crime had taken place.

An example of circumstantial evidence can be that if someone saw snow on the ground of the crime place then it can be assumed there was snowfall when the crime happened.

In direct evidence they do not require any kind of assumption or supposition that would to a conclusion, but in the case of circumstantial evidence it is required to draw an inference between the evidence and the result. Generally the value of the direct evidence is considered to be more as compared to the circumstantial evidence. The reliance of direct evidence is that whether the witness can be trusted or cannot be trusted, but in case of the circumstantial

² Yash Tandon, *the distinction between direct evidence and circumstantial evidence*, December 21st 2021 <<https://blog.ipleaders.in/direct-evidence/>> <accessed on 1st May 2021>

³ HP Gupta, *law relating to confession and dying declaration*, Dwivedi and Company, 2006

evidence they require a different type of reasoning. Circumstantial evidence requires you to believe that witness and also to evaluate the conclusions that can be drawn in the light of the evidences available⁴.

(B) Research problem

Circumstantial evidence refers to a situation when a witness cannot inform you directly of the fact, the fact that has to be proven. Instead of giving any direct information the witness gives some proofs of certain facts which can help to drive the fact finder on the basis of some rational conclusion. This can help to prove the claim that is supposed to be proven. To arrive at the conclusion on the basis on the circumstantial evidence an inference has to be drawn in relation to the facts of the case. The inference should relate to the facts of the case and there should not be any ambiguity. So this arises a question that the circumstantial evidence is based on the related chain of events that are needed to be inferred so can convictions be pronounced on the basis of the circumstantial evidence solely.

(C) Research question

Can the accused be convicted solely on the basis of the circumstantial evidences?

(D) Hypothesis

In situations where there is no direct evidence and the case is solely based on the circumstantial evidence then in such a situation for the conviction to take place on the sole basis of the circumstantial evidence the evidences has to undergo through different standards and conditions laid down by the courts in different case laws.

(E) Literature review

- Ratanlal and Dhirajlal, *The law of evidence*, Wadhwa and company Nagpur, 2007.

In this book the author discussed about the pivotal role of the law of evidence in the effective functioning of the judicial system as the existence of substantive rights can only be established by the relevant and admissible evidence. It lays down the quintessential aspects of judicial investigation for effective administration of justice. With rapid advances in diverse fields of life, human relations have undergone an unforeseen transformation, presenting new conflicts and controversies. Further the author discusses that the law of evidence has to therefore regularly groom itself for facing the emerging developments which pose unprecedented

⁴ *What is the definition of direct evidence*, December 3rd 2020, <<https://www.shouselaw.com/ca/blog/direct-evidence-definition/#:~:text=Direct%20evidence%20is%20defined%20as,infer%20the%20fact%20at%20issue>> <accessed on 1st May 2021>

problems in the collection of evidence and proof of facts. Over the years, the Courts through judicial precedents and diverse case law have enriched the lexicon of the law of evidence.

- Yash Tandon, *the distinction between direct evidence and circumstantial evidence*.

This online article discusses the major points of differences in relation to the direct evidence and the circumstantial evidence. The article gives the insights of the various cases in which the direct evidences were applied. The article also discusses further that how and in what situations the circumstantial evidences can be applied by the court of law. Further the article analyzes the drawbacks of the direct evidence and also discusses that whether the direct evidence has more probative value as compared to the circumstantial evidence. The article also gives the insights of the situation that under what circumstances the accused can be convicted on the basis of the circumstantial evidence solely. The article discusses the Aarushi Talwar case and gives the insights that how the conviction happened on the basis of circumstantial evidence solely in the absence of any direct evidence.

- Aniruddha Ghosal, *Aarushi Talwar murder case- key evidence that caught attention*, June 25th 2018.

This article gives the insights of the key evidences that got major attention during the investigation of the Aarushi Talwar case. The article explains how these evidences helped in making the basis of the case. The article also explains that there was no direct evidence available in regard of the case and the investigation was carried on based on the circumstantial evidence only. According to the article some of the major evidences were the two photographs that were found, the purple pillow cover, the status of the phone of Hemraj, blood stains on the stairs, the Fir, etc were among the major evidences in regard to the landmark case.

(F) Scope and objective

The scope of the paper is limited to the direct evidence and circumstantial evidence and the judgment of the Aarushi Talwar case. The objective of the research paper is to analyze the different aspects of the direct evidence and the circumstantial evidence and to check how in different cases they evidences are applied to arrive at the conclusion of the case and the conviction of the accused. The paper also focuses on the Aarushi Talwar case which is a landmark case in which the conviction happened on the basis of the circumstantial evidences in the absence of the direct evidence.

(G) Methodology

The research in the present research paper has adopted doctrinal method for collecting required

data. This research will base on analytical and critical studies. The research paper also includes secondary source of date, which includes articles, books and journals.

Sources of data-

1. Legal textbook
2. Online journals
3. Online articles
4. Case laws

II. AN OVERVIEW OF THE DIRECT EVIDENCE

‘Direct evidence’ can be considered as evidence that can establish any particular fact without the need to make an inference to connect the evidence to the facts of the case. Direct evidence gives the support to the truth of the assertion. Direct evidence basically directly proves or disproves any fact relating to the case⁵. Direct evidence is regarded as the tangible, real and clear evidence relating to the fact of the case, anything relating to the case or any event or happening of the case, that needs no consideration or thinking to prove the existence. Direct evidence do not require any kind of inference or reasoning to get the conclusion.

(A) Drawback of direct evidence

Although direct evidence is considered to be superior to the circumstantial evidence but it also has its own drawbacks. One of the major drawbacks in regard to the direct evidence can be considered that direct evidence is relied upon completely without any reasoning or thinking to prove its existence. An example in this regard can be if there is an eye witness of any crime, then there are chances that the witness can lie also or he or she may not be able to understand the events properly if the events happened quickly or there can be high stress to the witness and he or she may not recall the events properly in a certain way. There are chances also that the witness can maliciously testify that is he or she may intentionally give the wrong information. Though in this situation he or she may get prosecuted for giving false information or lying under a oath. This can only happen when the jury or the judge gives an order to cross examine the information given by the witness⁶.

(B) Does direct evidence have more probative value than the circumstantial evidence?

Generally the most common type of the direct evidence is regarded the eye witness testimony. In the eye witness testimony the witness gives the information about the exact scenario what

⁵ What is the definition of direct evidence, December 3rd 2020, <<https://www.shouselaw.com/ca/blog/direct-evidence-definition/#:~:text=Direct%20evidence%20is%20defined%20as,infer%20the%20fact%20at%20issue>>

⁶ Ratanlal and Dhirajlal, The law of evidence, Wadhwa and company Nagpur, 2007

happened in the crime scene and what was the situation at the happening of the crime. An example on this regard can be if someone is going out and he saw that someone kills a little boy. If the person testifies in the court that he or she saw the person killing the little boy then this can be regarded as direct evidence. This will be considered as a direct witness because the person saw the murder of the boy and thus he or she can identify the murderer. But in a situation if someone goes for a morning walk and then he comes across he dead body of a little boy in the park and he testifies this in front of the court then this will not be considered as a direct evidence because the person did not see the murder happening and also cannot identify the murderer or how the murder took place⁷. As per the Indian evidence act, the term circumstantial evidence is comes under the expression relevant facts and it is given that the relevant facts are needed to be proved by any kind of other evidence either documentary or oral, that is by some direct evidence. Circumstantial evidence is relied upon only when it points to the inference drawn by the court and also it should be in such a nature that it possibly leads to no other inference.

Therefore we can day that the value of the direct evidence is more than as compared to the circumstantial or the indirect evidence. As in the direct evidence there is a direct proof regarding any crime but in case of circumstantial evidence this is not the case, in it the conclusion or the inference needs to be drawn based on the circumstantial evidence and the various facts of the case. But there are cases that were solely solved on the basis of the circumstantial and indirect evidence only, due to the lacking of the direct evidence in the case.

III. AN OVERVIEW OF THE CIRCUMSTANTIAL EVIDENCE

Circumstantial evidence basically relates all the relevant facts. Any circumstantial evidence does not point to any fact relating to the case directly. In case of the circumstantial evidence an inference or reasoning must be drawn in order to link the circumstantial or the indirect evidence to the facts of the case that any party to the case is trying to prove⁸. Nowadays circumstantial evidence are also used to get to the conclusion of any case, and in many situation there is lacking of the direct evidence or the direct evidence can be misused and the justice can be impaired, so the courts are relying on the circumstantial evidence to diced the cases in these situations. For example fingerprints can be regarded a circumstantial evidence, a person seeing

⁷ *What is the definition of direct evidence*, December 3rd 2020, <<https://www.shouselaw.com/ca/blog/direct-evidence-defintion/#:~:text=Direct%20evidence%20is%20defined%20as,infer%20the%20fact%20at%20issue>>

⁸ David Ellison, *what is the difference between the direct and circumstantial evidence*, June 14th 2017, <<https://www.dellisonlaw.com/what-is-the-difference-between-direct-and-circumstantial-evidence>> <accessed on 1st May 2021>

a dead body near his house, these can come under indirect or circumstantial evidence.

(A) Can someone be convicted on just circumstantial evidence?

In the case *Chandmal vs Province of a Rajasthan*, the court held that in situations where there is no direct evidence and the case is solely based on the circumstantial evidence then in such a situation three conditions must be satisfied-

The first one is, the conditions on which the proving of the fact depends must be built up immovably. The second is the conditions need to be exact and the conditions must point to the blame of the individual who is denounced. The last one is, when all the conditions are taken in general and they all should make a total chain and there should not be any kind of escape in the chain created⁹.

In the case, *Sathya Narayan vs state*, it was held that in the specific cases where it is concluded and convinced that no immediate proof or direct evidence or observer is available regarding the said case then, in such a situation the court can give the conviction solely on the basis of the circumstantial proof if the five standards are connected-

The first one is the condition on which the finish of blame is to be drawn has to be totally built up. The second standard is, the realities so settled should be predictable just with the speculation of the blame of the denounced, that means they should be clarified on some other means or some other theory aside from the fact that the charge is blame worthy. The third standard is the conditions should be of a propensity and decisive sort. The fourth condition is the condition should avoid any other conceivable theory apart from the fact that is to be demonstrated. The fifth and the last standard is there should be a chain of conformation entirely without leaving nay sensible ground regarding the finish of the charge.

In one another case, *Khem Karan vs State of Uttar Pradesh*, the court held that, if all the evidence and the circumstances point towards the guilt of the offender and there is no scope of any other alternate hypothesis then in such a situation the accused can be convicted on the basis of the circumstantial evidence solely¹⁰.

When proving any kind of the circumstantial evidence we should not come too easily to the conclusion, other possibilities and theories can also be involved in the given case. So each and every aspect should be looked upon before drawing any conclusion or inference on the basis

⁹ Pratihtha Mandal, *all about circumstantial evidence*, <<https://blog.ipleaders.in/all-about-circumstantial-evidence/>> <accessed on 1st May 2021>

¹⁰ *Circumstantial evidence- definition, examples, defense, strategies*, 27th July 2020, <<https://www.shouselaw.com/ca/defense/legal-defenses/circumstantial-evidence/>> <accessed on 1st May 2021>

of the circumstantial evidence solely.

IV. IMPORTANT CASE LAWS

(A) State of U.P. v. Ravindra Prakash Mittal

In the case, the trial was taken by the respondent on the allegations that Saharanpur committed which was the murder of his wife Smt. Kamlesh and her burnt the dead body by sprinkling the kerosene oil. Therefore, they caused the evidence of the offence of murder in order to disappear with an intention of screening himself from any kind of legal punishment. On the above-mentioned allegations, he was the one who stood charge under the two heads that comes under Section 302 and Section 201 of the Indian Penal Code. In this case the court laid down that the circumstances from which the conclusion was drawn should be established by the court in the regard of the following case¹¹. The circumstances should depend on the moral certainty which will exclude the possibility of the guilt of any person other than the person who is accused. The circumstances should also be conclusive in its nature that is it should be unquestionable by the court of law on the bases of the set of circumstantial evidences which are provided as evidence. Thus, all the facts which are established should be accordant only with the hypothesis of the guilt and not according to the innocence of the accused person.

(B) Bodh Raj Bodha and Ors v. State of Jammu and Kashmir

In this case the question was whether the discovery of a weapon of assault on the basis of information was given by the accused while in the custody and it was also sufficient in order to fasten the guilt of the accused person. The court in this court held that the exact information was given by the accused which was leading to the recovery of the denouncing article should be proved and only then such information could become the basis of convicting the person who is accused of the following accusations. The court of law observed that Section 27 of the Indian Evidence Act was enacted as the proviso to Section 25 and Section 26 which was generally imposed in order to complete a ban on the admissibility of any kind of confession which is made by the accused either it is made to the police or to anyone during the period when the accused person was under the police custody. The main object of making this provision in Section 27 was in order to allow a certain portion of statements which are made by the accused to the police officer which is admissible as evidence whether or not such kind of statements is confessional or non-confessional. The ban is basically imposed by Section 25 and Section 26

¹¹ *Cases on circumstantial evidence*,

<<https://indiankanoon.org/search/?formInput=cases%20on%20circumstantial%20evidence>> <accessed on 3rd May 2021>

which would be lifted if the statement is clearly related to the facts which are discovered. Under Section 27 of the Indian Evidence Act, in order to provide the evidence that was leading to the discovery of any fact which is admissible in the court of law and the information should come from any accused person who is under the custody of the police. The statement is admissible as it comes under Section 27 of the Indian Evidence Act. As this section is that one which leads towards the information which further leads to the discovery of the admissible facts so, what is admissible is generally the information which has been discovered and it is provided by the information and not in the opinion which is formed on it by the police officer.

As for the benefit of both the accused and the prosecution the information which is given should be recorded and it should be proved. But if in case the information is not recorded and proved then the exact information must be mentioned through the evidence. The basic idea which was implanted under Section 27 is the Doctrine of Confirmation by the successive events¹². The doctrine was founded on the principle that if any facts are discovered in a search which is made on the strength of any information that is obtained from the prisoner, then such a discovery is a guarantee that the information which is provided by the prisoner is considered true. As the information might be confessional or it should be self-harming in nature but if it results in the discovery of facts then in that case it becomes reliable information. Now it is well established that the recovery of an object is not just a discovery of fact but it is anticipated under Section 27 of the Indian Evidence Act. The facts which are discovered are generally antiquated in the section so that it can embrace the place from which the object was produced and further the knowledge of the accused person as to it. Thus, the information regarding the concealment of the article of the crime does not usually lead to the discovery of the facts as the article was concealed at the place of indication in the knowledge of the accused person. The extent of the information which is admissible generally depends on the exact nature of the facts discovered to which such information is required to relate. The information related is being admitted in the evidence in order to confined that the portion of the information which is noticeably related to the facts thereby discovered and it must be curtailed as to make it unclear or to make it senseless. The extent of information is admitted and should be accordant with the understandability. Therefore, it was held by the court of law that the mere statement which the accused provided to the police and the witnesses to the place where he had concealed article. It is not indicative of the information which is considered under Section 27 of the Indian

¹²*Cases on circumstantial evidence,*

<<https://indiankanoon.org/search/?formInput=cases%20on%20circumstantial%20evidence>> <accessed on 3rd May 2021>

Evidence Act.

V. AN ANALYSIS OF THE AARUSHI TALWAR CASE

The Aarushi Talwar case is one of the landmark judgments in regard to the conviction based on solely on the circumstantial evidences. In the case the judgment was passed by the court on the basis of the conditional prove yet the court neglected to welcome the confirmation. In order to convict any accused on the basis of the circumstantial proof the court has to welcome all the different confirmations of the conditions which point towards the blame of charge against the accused. In this kind of situation every confirmation should point towards the blame of the charged. In the case of Aarushi Talwar this was not the situation. There were two CBI groups for the case and the reports submitted by these tow CBI groups have the suspect entirely unique arrangements of the individuals. The principle CBI group held the prime suspect as the servants as they have got their essence during the narco examination and the same was also demonstrated with the help of the melody broadcast on the different news channels, but the witness has not been conceded.

But later the case went to some other new CBI group, the prime suspect of this CBI group was the guardians and they had a total distinctive theory, that Rajesh her father murdered Aarushi and also the servant Hemraj when he saw them in a trading off position. The correct part of the couple in the murder case cannot be resolved but it was assumed that Dr Rajesh Talwar, murdered the two Aarushi and the servant Hemraj, and his wife, Dr Nupur Talwar, helped him in decimating the evidences¹³.

So the reports submitted by the two different groups of the CBI recommended two different conceivable outcomes of the case. Therefore, in a circumstance where the conviction depended on the incidental proofs, the circumstances which supported the blamed must be acknowledged by the court, and in such a situation the charged must be given the advantage of uncertainty¹⁴.

Be that as it may, here the court has neglected the issues and the take after this and the court sentenced the Talwar couple, Rajesh Talwar and Nupur Talwar, on the basis of the incidental confirmation without building the confirmation appropriately. Therefore, no advantage of the uncertainty was given to the accused that is to Rajesh Talwar and Nupur Talwar.

One can be held liable for murder or rape charges solely on the basis of the circumstantial

¹³ Marco Margaritoff, *inside the still unsolved murder of 13 years old Aarushi Talwar*, July 11th 2019, <<https://allthatsinteresting.com/aarushi-talwar>> <accessed on 3rd May 2021> <accessed on 3rd May 2021>

¹⁴ Aniruddha Ghosal, *Aarushi Talwar murder case- key evidence that caught attention*, June 25th 2018, <<https://indianexpress.com/article/india/aarushi-talwar-murder-case-rajesh-nupur-talwar-hemraj-noida-cbi-key-evidences-that-night-at-flat-l-32-4900539/>> <accessed on 3rd May 2021>

evidence, but the reliability on the public officials has to be made in this regard. And this makes the work of the public officials of immense responsibility¹⁵. The onus on the public officials in this regard is very huge and the investigation carried on by them has to be very clear and proper, so that justice is provided diligently, unlike in the case of Aarushi Talwar where the accused couple were not given the advantage of the uncertainty and that led to an improper justice.

VI. CONCLUSION

According to the law, both the direct evidence and the circumstantial evidence are permissible and allowed as a means of proving the facts. The law does not benefit one form of evidence over another form of evidence. It depends on the basis of each case that how much value is to be given to each evidence that is the direct evidence and the circumstantial evidence. These differ on the basis of each case according to the facts of the cases. Circumstantial evidence is very often debated as it has less weight and value as compared to the direct evidence. But this is not always true under the practice and according to the law. One of the major drawbacks of the direct evidence can be that it relies entirely on the evidence without any kind of thinking or reasoning to prove its existence. For example in a case where there is an eye witness of the crime, there are chances that the eye witness can give false or maliciously testimony in the court. In today's scenario the circumstantial evidences are also given importance in order to deliver the justice properly and to stop the misuse of the direct evidence. There are major differences in both the evidences and the reliability if each one of them depends on the facts and the circumstances of each case law¹⁶.

In practice if in any case there is direct evidence as well as the circumstantial evidence therefore the court feels itself in safe ground in proving the accused person guilty. But in any case where there is no direct evidence and only indirect evidences are available then the court even if the court believes in the circumstantial evidence, the court scrutinizes the evidence with such great care as to remove any kind of hypothesis in favor of the accused and after doing so the accused is held to be guilty.

¹⁵ Ashwani Kumar: *CBI Chief Who Handled Aarushi Talwar Murder, Focused on Economic Crimes*, October 8th 2020, <<https://thewire.in/government/ashwani-kumar-dead-cbi-nagaland-aarushi-talwar>> <accessed on 3rd May 2021>

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