# Legal Case Summary: Bani Alam Mazid @ Dhan vs The State of Assam (2025)

Case Title: Bani Alam Mazid @ Dhan vs The State of Assam

Citation: 2025 INSC 260

Court: Supreme Court of India

Date of Judgment: 24 February 2025

Bench: Justice Abhay S. Oka, Justice Ujjal Bhuyan

## Facts of the Case:

- The appellant was accused of kidnapping, murdering, and disposing of the body of a 16-year-old girl, Marjina Begum, with whom he allegedly had a romantic relationship.  
- FIR was lodged four days after the girl went missing, based on family members’ statements and a failed assurance of marriage by the appellant’s family.  
- The dead body was found five days after the victim was last seen with the appellant.  
- The Trial Court convicted the appellant under Sections 366(A), 302, 201, and 34 IPC; the High Court upheld the conviction under Sections 302 and 201 IPC.

## Procedural History:

- Trial Court convicted appellant under Sections 366(A), 302, 201, and 34 IPC.  
- High Court set aside the conviction under Section 366(A) but upheld convictions under Sections 302 and 201.  
- Appellant filed a criminal appeal before the Supreme Court challenging the conviction.

## Issues before the Court:

1. Whether the chain of circumstantial evidence was complete to establish guilt beyond reasonable doubt.  
2. Whether the evidence of last seen together and discovery of the body was sufficient for conviction.  
3. Whether the accused had any motive for committing the crime.

## Judgment:

- Supreme Court allowed the appeal and acquitted the appellant.  
- It held that the chain of circumstantial evidence was incomplete.  
- Extra-judicial confession was inadmissible and discovery evidence was unreliable.

## Key Legal Findings:

1. Circumstantial Evidence: The Court reiterated that every link in the chain must be proved. One broken link is sufficient to create reasonable doubt.  
2. Last Seen Theory: Significant time gap (5 days) between last seen and discovery weakens reliability. No evidence ruled out third-party involvement.  
3. Leading to Discovery: Inconsistent witness testimonies and absence of credible recovery undermine Section 27 Evidence Act claim.  
4. Lack of Motive: No evidence of motive as the victim and appellant were in a romantic relationship, and marriage was being arranged.  
5. Procedural Lapses: No FSL analysis of seized evidence; failure to examine key witnesses (mother and brother-in-law of appellant) weakened the prosecution case.  
6. Benefit of Doubt: Doubt in prosecution’s version warrants acquittal in criminal jurisprudence.

## Final Decision:

✅ Appeal allowed  
✅ High Court and Sessions Court judgments set aside  
✅ Appellant acquitted of all charges  
✅ Appellant to be released unless required in another case