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Understanding Serial Homicide in India: A Multifactorial Criminological and Legal Analysis

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Serial homicide remains an under-researched area in Indian criminology and law. Popular accounts often portray serial offenders through simplified psychological explanations. At the same time, contemporary criminological research suggests that serious and repeated violence may arise from the interaction of developmental, psychological, social, situational, and environmental factors. Research examining these issues specifically within the Indian context remains limited. This article examines selected cases of serial homicide in India through a qualitative and interdisciplinary approach combining criminology, psychology, victimology, and law. Rather than treating childhood abuse or adverse childhood experiences as direct causes of serial homicide, the study considers them alongside psychological vulnerabilities, family and social circumstances, economic conditions, criminal opportunity, victim vulnerability, individual agency, and institutional responses. The analysis demonstrates considerable variation among Indian serial homicide cases and does not support a single offender profile or developmental pathway. It also identifies an important limitation in existing Indian case material: reliable developmental and psychological histories are often incomplete or unavailable. Consequently, causal claims linking childhood adversity directly to later serial offending must be approached with caution. Where such adversity is established, it is better understood as one possible developmental risk factor within a broader combination of influences. The article further examines the legal and institutional response to repeated homicide in India, including criminal responsibility, investigation, crime linkage, forensic coordination, juvenile justice, victim protection, rehabilitation, and prevention.

It argues that serial homicide is best understood through a multifactorial framework that recognises both individual responsibility and the broader developmental, social, victimological, situational, and institutional contexts surrounding repeated serious violence.

Keywords: *serial homicide, criminology, childhood adversity, developmental criminology, victimology.*

INTRODUCTION

Serial homicide is a complex form of violent offending that cannot be adequately explained by a single psychological, social or developmental factor. Research and investigative guidance caution against assuming that serial offenders share one cause, motive or profile.¹ This article examines selected cases of serial homicide in India through an interdisciplinary framework combining criminology, psychology, victimology and law. Particular attention is given to childhood adversity and other developmental risk factors, without treating these experiences as inevitable causes of violence or as grounds, by themselves, for removing criminal responsibility.

American research and investigative practice have contributed substantially to discussions of serial homicide, particularly through offender profiling, behavioural analysis and criminal psychology. However, applying these approaches to India requires attention to differences in cultural conditions, social environments and institutional responses. Comparative research on India and the United States highlights the importance of examining serial offending within its particular social and cultural context.²

Research on serial homicide in India remains comparatively limited. A recent comparative study identifies the need for further Indian research and culturally sensitive investigative frameworks. Against this background, the present article examines how developmental circumstances, psychological vulnerabilities, victim vulnerability, criminal opportunity and institutional responses may contribute to understanding selected Indian cases. It also considers the limits of concluding incomplete offender histories.

¹ *Serial Murder Report* (Federal Bureau of Investigation, 2008)

² Nidhi Girish Manhakkat et al., 'Serial Killers in India and the United States: A Comparative Criminological and Psychological Analysis' (2025) 13(2) *International Journal of Indian Psychology*
<<https://up.ijip.co.in/index.php/ijip/article/view/1786>> accessed 16 August 2026

Developmental and life-course research examines how offending emerges, persists or changes over time. Findings from the Cambridge Study in Delinquent Development identify several childhood predictors of later offending, including impulsivity, low educational attainment, family criminality, poverty and poor parental supervision. The research also identifies associations between later life events and desistance from offending.³ These findings provide a framework for examining developmental influences, although research on general offending should not be treated as direct evidence of the causes of serial homicide.

Childhood abuse and neglect may increase the risk of later criminal and violent behaviour, but this relationship is neither direct nor inevitable. Widom's research found that most abused and neglected children did not subsequently become delinquent, criminal or violent.⁴ Accordingly, this article treats childhood adversity, where reliably documented, as one possible risk factor within a broader developmental context. It does not assume that adversity explains an offender's conduct or establishes a psychological diagnosis.

The study adopts a qualitative, doctrinal and case-based approach, informed by criminological, psychological and victimological research. It draws on judicial decisions, legislation, academic literature and relevant secondary accounts to examine selected Indian serial homicide cases. Judicial findings are distinguished from media reports, and conclusions about offenders' developmental histories are limited to what the available material supports. The objective is to assess how different influences may interact, rather than to establish a causal relationship between childhood adversity and serial homicide.

The study addresses four research questions. First, what developmental, psychological, social, situational and institutional factors emerge from the selected cases? Second, what recurring patterns and significant differences can be identified across them? Third, how useful are existing criminological theories in interpreting these cases within the Indian context? Fourth, what implications arise for criminal responsibility, child protection, rehabilitation, violence prevention and the Indian criminal justice system?

³ David P Farrington, 'The development of offending and antisocial behaviour from childhood: key findings from the Cambridge Study in Delinquent Development' (1995) 36(6) *Journal of Child Psychology and Psychiatry* <<https://doi.org/10.1111/j.1469-7610.1995.tb01342.x>> accessed 16 August 2026

⁴ Cathy Spatz Widom, 'The Cycle of Violence' (1989) 244 (4901) *Science* <<https://www.jstor.org/stable/1702789>> accessed 16 August 2026

The article first outlines the relevant criminological and legal framework, then examines selected Indian cases, and finally considers their implications for criminal responsibility, prevention, rehabilitation and institutional responses to repeated homicide.

CONCEPTUALISING SERIAL HOMICIDE IN THE INDIAN CONTEXT

Serial homicide involves repeated unlawful killings in separate events. Definitions differ, particularly concerning the number of victims and the interval between killings. The Federal Bureau of Investigation (FBI) defines serial murder as the unlawful killing of two or more victims by the same offender or offenders in separate events.⁵ This emphasis on separate events distinguishes serial homicide from multiple killings within a single incident. Although some definitions refer to a “cooling-off period”, a fixed interval between killings is not required by the FBI’s definition.

American investigative research has contributed substantially to the development of behavioural analysis and offender profiling. The work associated with Robert Ressler, Ann Burgess and John Douglas examined offender characteristics and crime-scene behaviour, helping to establish influential approaches to understanding repeated homicide. However, these approaches should be evaluated critically when applied outside the settings in which they were developed.

Psychological and criminological explanations examine different aspects of serial offending, including motivation, personality, developmental experiences and criminal opportunity. These perspectives should be considered together rather than treated as competing explanations that independently account for every case. FBI guidance emphasises that serial offenders do not share a single cause, motive or profile. A multifactorial approach therefore provides a useful framework for examining variation across offenders and their circumstances.

Developmental and life-course perspectives examine how offending emerges, persists and changes over time. Farrington’s research identifies several childhood predictors of later offending, including impulsivity, poor educational attainment, family criminality, poverty and inadequate parental supervision. It also considers the relationship between later life events and desistance. These findings help explain why an offender’s development should be examined over

⁵ ‘Serial Killers’ *Federal Bureau of Investigation* (10 September 2013) <<https://www.fbi.gov/news/stories/serial-killers---part-1-the-fbis-role-takes-shape>> accessed 16 August 2026

time, while recognising that evidence concerning general offending does not directly establish the causes of serial homicide.

Childhood adversity is one possible developmental risk factor. Research indicates that childhood abuse and neglect may increase the risk of later criminal and violent behaviour. However, most abused and neglected children do not subsequently become delinquent, criminal or violent. Childhood adversity should therefore be considered alongside other influences, rather than treated as an inevitable pathway to serial homicide.

The relevance of developmental analysis lies in examining how early experiences may interact with later psychological vulnerabilities, family circumstances, social environments and criminal opportunities. Applying this approach in India requires attention to its particular cultural and institutional conditions. Comparative research on Indian and American serial offenders highlights the need for context-specific research and culturally sensitive investigative frameworks. This supports examining Indian cases on their own evidence rather than assuming that findings from other countries apply unchanged.

The present study accordingly adopts a multifactorial framework. It considers developmental, psychological, social, victimological, situational and institutional influences, while acknowledging gaps in the available evidence. Where reliable childhood histories are unavailable, causal conclusions would be speculative. This approach permits consideration of adversity without assuming that an offender was destined to commit violence or that adverse experiences automatically remove criminal responsibility.

SERIAL HOMICIDE UNDER THE IPC AND BNS LEGAL CONTINUITY AND LIMITATIONS

Neither the Indian Penal Code 1860 (IPC) nor the Bharatiya Nyaya Sanhita 2023 (BNS) establishes a separate offence expressly designated as “serial murder”. Repeated killings are addressed through the applicable homicide provisions, with liability determined by the circumstances and evidence concerning each offence.⁶ The criminological classification of an

⁶ Indian Penal Code 1860; Bharatiya Nyaya Sanhita 2023

offender as a serial killer does not replace the legal requirement to establish the elements of the offences charged.

Sections 299 and 300 of the IPC define culpable homicide and murder respectively, while section 302 prescribes the punishment for murder. Under the BNS, section 100 defines culpable homicide, section 101 specifies when culpable homicide amounts to murder, and section 103(1) prescribes the punishment for murder.⁷ These provisions retain the central distinction between culpable homicide and murder, although the legal classification of each killing depends on the statutory requirements and applicable exceptions.

The transition to the BNS does not mean that all earlier offences are prosecuted under the new legislation. Section 358 preserves liabilities, penalties and proceedings relating to offences committed under the IPC before its repeal.⁸ This distinction is particularly relevant to the historical cases examined in this article.

The absence of a separate offence of serial murder does not, by itself, prevent prosecution for repeated killings. The importance of identifying seriality lies principally in connecting offences, recognising recurring patterns and preventing further violence. Whether a separate statutory offence would improve these functions is a policy question that requires evidence beyond the existence of repeated offending.

Investigative coordination is particularly important when killings initially appear unrelated. FBI guidance identifies inter-agency cooperation, effective case management, crime analysis and consistent forensic services as useful practices in serial murder investigations. In India, stronger crime-linkage mechanisms and information sharing may similarly assist investigators in identifying connections across cases. This is an institutional recommendation rather than a claim that every instance of delayed detection results from inadequate coordination.

Repeated homicide may also be relevant to sentencing, but the label “serial killer” does not automatically justify capital punishment. In *Bachan Singh v State of Punjab*, the Supreme Court established that the death penalty should be confined to the rarest of rare cases where the alternative punishment is unquestionably foreclosed.⁹ In *Machhi Singh v State of Punjab*, the

⁷ Indian Penal Code 1860, ss 299, 300 and 302; Bharatiya Nyaya Sanhita 2023, ss 100, 101 and 103(1)

⁸ Bharatiya Nyaya Sanhita 2023, s 358(2)

⁹ *Bachan Singh v State of Punjab* (1980) 2 SCC 684

Court elaborated on this approach and stressed consideration of the circumstances of both the crime and the offender.¹⁰ The number and manner of killings may be relevant, but sentencing still requires consideration of aggravating and mitigating circumstances.

The Indian framework therefore provides a basis for prosecuting repeated homicide without creating a separate offence of serial murder. This article argues that greater attention should be directed towards crime linkage, forensic coordination, inter-jurisdictional information sharing and specialised investigation. These measures may strengthen the identification and prevention of repeated offending while preserving the requirement to prove individual criminal responsibility.

RIPPER JAYANANDAN DEVELOPMENTAL CONTEXT AND INSTITUTIONAL RESPONSE

Jayanandan's case provides a useful basis for examining robbery-related violence, victim vulnerability and the limits of reconstructing an offender's developmental history. In *State of Kerala v Jayanandan*, concerning the Puthenvelikkara incident, the Kerala High Court upheld his conviction for murdering Baby alias Devaky and for related offences, including the attempted murder of her husband, Ramakrishnan. The Court substituted the death sentence with imprisonment for the remainder of his natural life.¹¹ The judgment provides evidence concerning the offences, investigation and sentencing. However, it does not provide a sufficiently detailed developmental history to establish a relationship between childhood adversity and the offending. The analysis must therefore distinguish judicially relevant facts from broader criminological interpretations.

Developmental Context and the Limits of Available Evidence: The absence of a detailed childhood history limits attempts to identify developmental influences in Jayanandan's case. Childhood abuse, neglect, family dysfunction or social marginalisation should not be presented as established explanations without supporting evidence.

A developmental approach remains useful for identifying questions that further research could examine, including family circumstances, education, earlier behaviour and access to support.

¹⁰ *Machhi Singh & Ors v State of Punjab* (1983) 3 SCC 470

¹¹ *State of Kerala v Jayanandan* (2016) DSR No 1 of 2012 and Crim App No 453/2012 (Kerala High Court)

However, these questions must remain open where reliable information is unavailable. The case illustrates the limitations of developmental analysis rather than proving a particular developmental pathway.

Victimology and Criminal Opportunity: In the Puthenvelikkara case, the Court found that Jayanandan murdered a woman who was sleeping in her home, seriously injured her husband and committed robbery. The judgment also records the recovery of stolen ornaments and evidence concerning their pledge and sale.¹² These findings permit analysis of victim vulnerability, access to a household and financial motivation. They do not, by themselves, establish that every offence attributed to Jayanandan followed an identical pattern. Claims about consistent victim selection across several incidents require separate evidence for each incident.

From a preventive perspective, the case raises questions about household security, timely assistance and protection for people vulnerable to robbery-related violence. Such analysis concerns opportunities exploited by the offender and does not place responsibility on the victims.

Institutional Response and Evidentiary Safeguards: The judgment demonstrates the importance of reliable evidence in establishing criminal responsibility. The High Court also held that statements concerning previous convictions could not substitute for their formal proof under the applicable procedural requirements. This distinction is important when discussing an offender's alleged criminal history.

Crime linkage, information sharing and forensic coordination may assist investigations into suspected repeated offending. FBI guidance identifies inter-agency cooperation, effective case management and consistent forensic services as useful investigative practices. These principles inform recommendations for institutional improvement, but they do not establish that particular agencies failed in Jayanandan's case.

Developmental Criminology and Prevention: Developmental criminology examines how offending changes over time and how individual characteristics interact with family circumstances, education and later life events. Farrington's research identifies several predictors of offending while also examining factors associated with desistance. This framework supports

¹² *Ibid*

attention to assessment, rehabilitation and social reintegration. Nevertheless, Jayanandan's case does not establish that early intervention would necessarily have prevented the offences. Nor should progression from property offending to homicide be described as inevitable.

Implications for the Childhood Adversity and Serial Homicide Debate: The case cannot substantiate a direct relationship between childhood abuse and serial homicide without reliable evidence of the offender's childhood experiences. General research showing an association between childhood victimisation and later violence does not establish causation in an individual case. Widom's findings also demonstrate that most abused and neglected children do not subsequently become criminal or violent.

Jayanandan's case therefore supports a cautious analytical approach that distinguishes facts, reported allegations and theoretical interpretations. Criminal opportunity, financial motivation, victim vulnerability and institutional response may be examined where supported by evidence. Childhood adversity should remain a possible subject of inquiry rather than an assumed explanation.

AUTO SHANKAR ORGANISED CRIME AND CRIMINAL OPPORTUNITY

Gauri Shankar, commonly known as Auto Shankar, was prosecuted with others for six murders in Tamil Nadu. In *Shankar alias Gauri Shankar v State of Tamil Nadu*, the Supreme Court confirmed his convictions and death sentence in 1994.¹³ The judgment describes his involvement in illicit liquor and prostitution-related activities and examines killings connected with his relationships and criminal operations.

These circumstances provide a basis for examining criminal associations, motivation, opportunity and individual choice. They do not establish that childhood adversity or a particular psychological condition caused the offending. This article therefore examines the case through a multifactorial framework while distinguishing judicial findings from theoretical interpretations.

Developmental Context and Criminal Opportunity: The judicial material examined here does not provide a sufficiently detailed childhood history to establish a developmental

¹³ *Shankar alias Gauri Shankar & Ors v State of Tamil Nadu* (1994) 4 SCC 478

explanation for Shankar's offending. It would therefore be speculative to attribute his conduct to childhood abuse, neglect or family dysfunction.

The available evidence instead permits closer consideration of his criminal activities and relationships. A developmental analysis could investigate how involvement in these activities changed over time, but it must avoid presenting an unverified account of his earlier life. Economic hardship, social instability and childhood adversity should not be assumed merely because an offender became involved in serious crime.

Victimology and Victim Selection: The judgment describes relationships between Shankar, his associates and the victims, including conflicts connected with his criminal activities. These circumstances make it inappropriate to describe the killings simply as random victim selection.

A victimological analysis should examine each victim's relationship with the offender, the circumstances of access and the immediate context of the killing. Criminal objectives and victim vulnerability may interact; they should not be treated as mutually exclusive explanations.

The conduct of victims must also be distinguished from responsibility for their deaths. Association with an offender or proximity to criminal activity does not transfer responsibility from the perpetrator to the victim.

Institutional Response and Investigation: The prosecution relied on approver testimony, confessions and corroborating evidence. The Supreme Court examined their evidentiary value when assessing the convictions. The case therefore provides a basis for discussing the importance of corroboration and careful judicial evaluation of evidence.

More generally, investigations into suspected serial homicide may benefit from crime linkage, information sharing and forensic coordination. FBI guidance identifies these practices as useful components of an investigative response. However, any claim that particular institutional failures delayed detection in Shankar's case requires specific supporting evidence.

Organised Criminality and Behavioural Interpretation: Shankar's criminal activities provide an important context for analysing his violence. The case allows consideration of how criminal associations, conflicts, financial interests and opportunities may interact with individual decisions. These circumstances do not establish a clinical diagnosis or prove that

every killing arose from the same motive. A multifactorial interpretation should acknowledge differences between incidents and avoid assuming that criminal involvement inevitably develops into serial homicide.

Legal and Constitutional Legacy: A separate dispute concerning the proposed publication of Shankar's alleged autobiography resulted in *R Rajagopal v State of Tamil Nadu*. The Supreme Court considered the relationship between freedom of the press, individual privacy and publication concerning public officials.¹⁴

The Court recognised privacy as implicit in Article 21. It also held that the petitioners could publish material concerning Shankar's life insofar as it appeared in public records, without obtaining his consent. Publication extending beyond those records could attract liability for invasion of privacy. The Court further held that the State and its officials could not prevent the proposed publication. This judgment concerns publication and constitutional rights rather than proof of the murders. It is relevant to the present study because it highlights the legal responsibilities associated with publishing accounts of offenders' lives and allegations concerning public officials.

Implications for the Childhood Adversity and Serial Homicide Debate: The case does not establish a causal relationship between childhood adversity and serial homicide. It instead permits analysis of documented criminal activities, relationships, opportunities and decisions, while leaving unsupported developmental explanations open. Research associating childhood victimisation with later violence cannot, by itself, establish why a particular offender committed homicide. Widom's findings also show that most abused and neglected children do not subsequently become criminal or violent. Childhood adversity should therefore be considered only where reliable evidence exists and alongside other relevant influences.

KUPPUSAMY SEXUAL VIOLENCE AND VICTIM VULNERABILITY

Kuppusamy's case raises questions about sexual violence, victim vulnerability and criminal opportunity. A contemporary report described his arrest in Tamil Nadu in July 2009 and

¹⁴ *R Rajagopal v State of Tamil Nadu* (1994) 6 SCC 632

attributed allegations of eight killings and sexual assaults to police officials.¹⁵ Another report described alleged robbery and the recovery of jewellery.¹⁶ These accounts provide material for criminological discussion, but police allegations must be distinguished from judicial findings. The case is examined here through a multifactorial framework. The available reporting does not establish that childhood adversity, a psychological disorder or any single influence caused the alleged offending. Its principal relevance lies in examining reported victim-selection patterns, opportunities for violence and the limitations of the available evidence.

Developmental Uncertainty and the Limits of Causal Explanation: The sources relied upon in this section do not provide a sufficiently detailed childhood or clinical history to establish a developmental explanation. It would therefore be speculative to state that Kuppusamy experienced childhood abuse or that such experiences caused his later behaviour. Poverty, neglect, substance use and social marginalisation should likewise not be presented as established influences without supporting evidence. A developmental approach may guide further inquiry, but it cannot fill gaps in an offender's history through assumptions.

Victim Vulnerability and Routine Activities: The contemporary report attributed to police a pattern of attacks on women who were alone while working in fields, collecting firewood or grazing livestock. If substantiated, these circumstances would permit analysis of accessibility, isolation and opportunities for immediate assistance.

Cohen and Felson's routine activity approach examines the convergence of a likely offender, a suitable target and the absence of capable guardianship.¹⁷ It offers a framework for considering opportunities for offending rather than a complete explanation of an offender's motivation.

¹⁵ V Mayilvaganan, 'Pudukottai man held for raping, killing 8 women' *The Times of India* (23 July 2009) <<https://timesofindia.indiatimes.com/india/pudukottai-man-held-for-raping-killing-8-women/articleshow/4809799.cms>> accessed 16 August 2026

¹⁶ 'Psycho killer nabbed' *The New Indian Express* (16 May 2012) <<https://www.newindianexpress.com/states/tamil-nadu/2009/Jul/23/psycho-killer-nabbed-70206.html>> accessed 16 August 2026

¹⁷ Lawrence E Cohen and Marcus Felson, 'SOCIAL CHANGE AND CRIME RATE TRENDS: A ROUTINE ACTIVITY APPROACH' (1979) 44(4) *American Sociological Review* <<https://doi.org/10.2307/2094589>> accessed 16 August 2026

Applied cautiously, this perspective directs attention to the circumstances exploited by the perpetrator. It does not make victims responsible for violence because they worked or travelled alone.

Reported Post Mortem Sexual Activity and Interpretation: The report also attributed allegations of sexual activity with victims' bodies to police officials. Such reporting should not be treated as a verified psychiatric assessment. The available material does not justify diagnosing Kuppusamy with a particular disorder. The reported conduct raises questions about sexual motivation and the relationship between sexual assault and homicide. However, claims that domination, control or a particular psychological condition motivated the acts require additional evidence. Descriptions of behaviour and clinical diagnoses must remain distinct.

Investigative Challenges and Crime Linkage: The reporting describes police recognition of similarities between incidents and the tracing of a vehicle abandoned after an alleged attack. These details illustrate potential sources of investigative leads, although the report alone cannot establish the complete evidentiary basis of subsequent proceedings. More generally, investigations into suspected repeated homicide may benefit from comparing crime-scene evidence, victim circumstances and geographical patterns. FBI guidance identifies crime analysis, information sharing and consistent forensic services as useful investigative practices. Similarities can assist investigation, but they do not independently prove that the same offender committed every offence.

Implications for the Childhood Adversity and Serial Homicide Debate: The material examined here does not establish a direct relationship between childhood adversity and Kuppusamy's alleged offending. General research associating childhood victimisation with later violence cannot establish causation in this individual case. Widom's research also demonstrates that most abused and neglected children do not subsequently become criminal or violent. The case therefore requires an approach that separates reported conduct, established findings and theoretical interpretation. Victim vulnerability, criminal opportunity and possible motivations may be examined where evidence supports them. Childhood adversity should remain an open question rather than an assumed explanation.

AMARJEET SADA CHILDHOOD VIOLENCE AND CRIMINAL RESPONSIBILITY

Amarjeet Sada was reportedly about eight years old when allegations of repeated killings emerged in Bihar in 2007. Later media accounts described him as the “world’s youngest serial killer”.¹⁸ This label should be treated as a media description rather than a verified legal or clinical classification. The case raises questions about childhood development, victim protection and criminal responsibility. However, the reporting relied upon here does not establish a complete developmental history, a verified psychiatric diagnosis or the final judicial determination of the allegations. These limitations must guide the analysis.

Developmental Criminology and Early Onset Violence: Serious violence allegedly committed during childhood requires an approach that considers development alongside the circumstances of the incident. Frick and Viding’s research identifies different developmental pathways to severe antisocial behaviour and emphasises the importance of examining multiple levels of influence.¹⁹ This framework supports inquiry into individual characteristics, family circumstances, social environments and developmental experiences. It does not establish which factors operated in Sada’s case. Poverty, neglect, abuse or psychological disturbance should therefore not be presented as proven causes without reliable supporting evidence.

Childhood Violence and Victim Vulnerability: Media accounts describe allegations involving very young victims, including infants. Their reported ages raise questions about their limited ability to resist violence or obtain assistance. A victimological analysis may examine supervision, access and opportunities for intervention. However, the available reporting does not establish that dominance or control was the child’s principal motive. Nor should consideration of supervision become an unsupported allegation of negligence against family members or caregivers.

Callous Unemotional Traits and the Limits of Diagnosis: Media accounts describe apparent smiling and an absence of remorse following the alleged killings. Such observations

¹⁸ ‘8-year-old boy from Bihar Is ‘World’s youngest serial killer,’ say reports’ *The New Indian Express* (23 July 2022) <<https://www.newindianexpress.com/india/2022/Jul/23/8-year-old-boy-from-bihar-is-worlds-youngest-serial-killer-say-reports-2479862.html>> accessed 16 August 2026

¹⁹ Paul J Frick and Essi Viding, ‘Antisocial behavior from a developmental psychopathology perspective’ (2009) 21(4) *Development and Psychopathology* <<https://doi.org/10.1017/S0954579409990071>> accessed 16 August 2026

cannot establish a psychological diagnosis or reliably determine a child's understanding of events.

Frick and Viding discuss callous–unemotional traits as relevant to distinguishing developmental pathways among some children with serious antisocial behaviour. This research provides a theoretical context, but it does not justify attributing those traits to Sada without an appropriate assessment. The appropriate implication is the need for professional evaluation rather than diagnosis through media descriptions. Clinical assessment and the legal assessment of criminal responsibility must also remain distinct.

Institutional Response and Early Intervention: The allegations raise questions about timely assessment, protection of other children and coordinated intervention. A suitable response should consider the child's developmental needs alongside the safety of potential victims. Cooperation between caregivers, mental health professionals, child protection agencies and juvenile justice authorities may assist assessment and intervention. These are recommendations arising from the issues raised by the case, rather than findings that particular institutions failed or that an intervention would necessarily have prevented the alleged violence.

Juvenile Justice and Criminal Responsibility: At the time of the reported incidents, section 83 of the Indian Penal Code 1860 governed acts committed by children above seven and under twelve who lacked sufficient maturity of understanding to judge the nature and consequences of their conduct on the occasion concerned.²⁰ Consequently, a reported age of eight would require attention to this provision. It would not automatically establish either criminal responsibility or exemption from it.

The applicable juvenile justice framework was the Juvenile Justice (Care and Protection of Children) Act 2000, as amended. Section 15 provided measures including counselling, supervision and placement in a special home. Section 16 prohibited specified punishments, including the death penalty and imprisonment extending to life imprisonment.²¹

²⁰ Indian Penal Code 1860, s 83

²¹ Juvenile Justice (Care and Protection of Children) Act 2000, ss 15 and 16

The legal analysis must therefore distinguish the question of criminal capacity from the measures available under juvenile justice law. The later adult-trial assessment provisions of the 2015 Act should not be applied retrospectively to explain the reported 2007 incidents.

Implications for the Childhood Adversity and Serial Homicide Debate: The available material does not establish that childhood adversity caused the alleged killings. General research concerning childhood victimisation and later violence cannot supply missing evidence about this particular child. Widom's findings also demonstrate that most abused and neglected children do not subsequently become criminal or violent. The case therefore highlights the need to distinguish allegations, developmental theories, clinical assessments and legal findings. A multifactorial approach can guide further inquiry without treating poverty, childhood adversity or psychological disturbance as an inevitable pathway to serious violence.

CYANIDE MALLIKA GENDER TRUST AND SERIAL HOMICIDE

Mallika, commonly known as Cyanide Mallika, provides a basis for examining deception, victim access, financial motivation and gendered assumptions about serial homicide. In the Muniyamma murder case, the Karnataka High Court upheld her conviction but replaced the death sentence with life imprisonment, finding that the circumstances did not warrant capital punishment.²² The case permits analysis of how trust and criminal opportunity may interact with individual decisions. It does not establish that gender, financial circumstances or any single psychological characteristic caused the offending.

Gendered Assumptions and Female Serial Offending: Mallika's case challenges the assumption that serial offenders are necessarily male. FBI guidance similarly cautions against treating serial killers as a uniform category with a single demographic profile or motivation.

Gender may be relevant to examining social expectations and opportunities to establish trust. However, this case does not prove that female offenders generally use deception or poisoning, or that male offenders necessarily rely on direct physical violence. Such generalisations require evidence extending beyond an individual case.

²² *The Registrar General High Court of Karnataka Bangalore v Mallika alias Lakshmi alias Shivamogga Kempamma* (2012) Crim App No 434/2009 and Criminal Referred Case No 5/2009 (Karnataka High Court)

Religion Trust and Victim Access: The judgment records the prosecution’s account of Mallika befriending women visiting temples. In the Muniyamma incident, religious activity formed part of the circumstances in which the accused obtained access to the victim and administered cyanide.²³ These circumstances permit examination of how an offender may exploit trust associated with a familiar social setting. They do not justify treating religious practice or religious communities as inherently unsafe. The focus remains on the perpetrator’s exploitation of trust. The use of deception should also not obscure physical violence. The judgment’s account includes the forcible administration of poison.

Victim Vulnerability and Criminal Opportunity: Victim vulnerability should be examined in relation to the circumstances of the incident rather than treated as a personal weakness. Trust, accessibility and opportunities for assistance may be relevant questions, but they should not be assumed without evidence. In this case, analysis should focus on how the offender obtained access and exploited the situation. The victim’s participation in religious activity does not make her responsible for the violence committed against her.

Financial Motivation and Offender Choice: The judgment records the removal of Muniyamma’s ornaments following the poisoning. This provides a basis for examining financial gain as part of the offending context. Nevertheless, describing Mallika as a “comfort-oriented offender” would require a clearly identified theoretical source and an explanation of why that classification applies. The present analysis therefore uses the more precise description of financial motivation without assigning a fixed offender type.

Financial gain also does not provide a complete causal explanation. It should be considered alongside access, deception, opportunity and the offender’s decisions.

Institutional Response and Evidentiary Limits: The judgment illustrates the importance of establishing criminal responsibility and sentencing circumstances through evidence. When considering punishment, the High Court declined to rely on alleged antecedents that had not been brought onto the record. More generally, suspected repeated poisoning may require coordinated investigation, comparison of incidents and appropriate forensic examination. FBI guidance identifies information sharing, crime analysis and consistent forensic services as useful

²³ *The Registrar General High Court of Karnataka Bangalore v Mallika alias Lakshmi alias Shivamogga Kempamma* (2012) Crim App No 434/2009 and Criminal Referred Case No 5/2009 (Karnataka High Court)

investigative practices. These recommendations should be distinguished from findings that particular institutional weaknesses caused Mallika's offending.

Implications for Criminological Analysis: Mallika's case supports examining several dimensions of offending together, including financial motivation, deception, victim access, criminal opportunity and individual choice. Gender and religious settings may inform contextual analysis without being treated as causes in themselves. The case also demonstrates the need to distinguish facts from offender classifications and psychological interpretations. Any explanation involving childhood adversity or a clinical condition requires reliable supporting evidence. A multifactorial approach can accommodate these uncertainties while preserving individual criminal responsibility.

CONCLUSION

This study examined selected Indian serial homicide cases through an interdisciplinary framework combining criminology, psychology, victimology and law. The analysis supports a multifactorial approach that considers criminal motivation, opportunity, victim vulnerability, developmental circumstances and institutional responses. It does not establish a single cause, offender profile or developmental pathway applicable to all cases.

The selected cases raise different issues. Jayanandan's case illustrates robbery-related violence and the importance of evidentiary safeguards. Auto Shankar's case highlights criminal associations, conflicts and offender choice. The reporting concerning Kuppusamy raises questions about sexual violence, victim access and crime linkage. The allegations concerning Amarjeet Sada require attention to childhood development, criminal capacity and juvenile justice. Mallika's case permits examination of deception, financial motivation and the exploitation of trust. These differences support contextual analysis while requiring a distinction between judicial findings, reported allegations and theoretical interpretations.

A central limitation is the incomplete developmental and clinical information in the sources examined. The study therefore cannot establish that childhood abuse, neglect or other adverse experiences caused the offending described. Where childhood adversity is reliably documented, it may be considered a possible risk factor alongside other influences. An association identified in general research cannot establish causation in an individual case.

The multifactorial framework used here provides a method for organising relevant evidence and identifying questions for further investigation. It should not be treated as a proven causal model derived from this limited selection of cases. Similarly, considering developmental and social circumstances does not automatically remove criminal responsibility. Responsibility must be assessed under the applicable law, including the rules concerning criminal capacity where children are involved.

The legal analysis indicates that existing homicide provisions provide a basis for prosecuting repeated killings without a separate offence expressly designated as serial murder. An important practical concern is the identification of connections between incidents through reliable evidence, forensic examination and coordinated investigation. Claims of institutional failure must nevertheless be supported by evidence relating to the particular case.

The study recommends stronger crime-linkage mechanisms, improved information sharing and forensic coordination, and developmentally appropriate assessment and intervention where children display serious harmful behaviour. It also recommends further Indian empirical research using verified judicial records, ethically obtained offender histories, clinical assessments and victimological data. These measures may improve understanding, investigation and prevention while avoiding unsupported diagnoses, victim blaming and deterministic explanations of violence.