SUPREME COURT OF INDIA · 16 NOV 2026

Supreme Court Cites Prof. G. S. Bajpai's Research on Wrongful Incarceration in Landmark Compensation Judgment

NATIONAL LAW UNIVERSITY DELHI



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CASE	CITATION	COMPENSATION
Devilal Gond v. State of Chhattisgarh & Ors.	2026 INSC 1226 Decided 16 November 2026	Rs. 2 lakh → Rs. 30 lakh 7+ years held after acquittal

The Supreme Court of India has extensively cited the research of Prof. (Dr.) G. S. Bajpai, Vice Chancellor, National Law University Delhi, in *Devilal Gond v. State of Chhattisgarh & Others* (2026 INSC 1226), decided on 16 November 2026.

The case concerned a man who remained in prison for more than seven years after he was acquitted. The Court raised his compensation from Rs. 2 lakh to Rs. 30 lakh, and noted that India still has no statutory scheme to compensate wrongful incarceration.

In paragraph 41, the Court records Prof. Bajpai's appointment as Amicus Curiae in *Babloo Chauhan v. State (NCT of Delhi)* (Delhi High Court, 2017). It refers to his report on wrongful incarceration, which surveyed compensation laws in 32 US states and the District of Columbia, and schemes in the UK and New Zealand. That case led the Law Commission to examine the issue in Report No. 277 (2018).

> "Nearly a decade on, this research is again part of the conversation on Article 21, State accountability and remedies for lost liberty.

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READ THE JUDGMENT
https://indiankanoon.org/doc/65309613/

#SupremeCourt #Article21 #CriminalJustice
#LegalResearch #NLUDelhi

LEGAL BRIEFING · ANALYTICAL CASE SUMMARY

Devilal Gond v. State of Chhattisgarh & Ors.

Supreme Court of India | 2026 INSC 1226 | Decided 16 November 2026

Amicus report from 2017 revisited as the Court raises compensation for a man held in jail for over seven years after his acquittal

New Delhi, 21 November 2026. The Supreme Court of India has referred to the research of Prof. (Dr.) G. S. Bajpai, Vice Chancellor of National Law University Delhi, in a judgment that raised the compensation owed to a man who spent more than seven years in prison after he had been acquitted.

1. Constitutional Context & Executive Summary

The judgment of the Supreme Court of India in ***Devilal Gond v. State of Chhattisgarh & Ors.*** (Criminal Appeal No. [ ] of 2026, arising out of SLP (Crl) No. 12217 of 2026; 2026 INSC 1226, authored by Justice Sanjeev Sachdeva sitting with Justice Augustine George Masih, decided on 16 November 2026) marks a critical milestone in Indian criminal jurisprudence and public law. The case addresses an egregious breakdown of state administration resulting in the unlawful detention of an acquitted citizen for over seven years beyond his judicial acquittal.

The decision establishes vital constitutional principles regarding the enforcement of fundamental rights under Article 21 of the Constitution of India, the strict liability of the State for administrative sclerosis, and the imperative for restorative monetary compensation in public law. Beyond modifying the inadequate compensation awarded by the High Court of Chhattisgarh from ₹2,00,000 to ₹30,00,000 with a structured financial protection plan, the Supreme Court issued sweeping, nationwide directives to all High Courts to institute mandatory physical jail inspections and establish an integrated digital framework known as the Online Criminal Justice Ecosystem.

7 yrs 3 m 29 d
Unlawful detention after acquittal

₹2 lakh → ₹30 lakh
Compensation enhanced by the Supreme Court

All High Courts
Asked to adopt inspection and digital safeguards

TABLE 1 · CASE AT A GLANCE

Case Parameter	Details & Judicial Findings
Appellant	Devilal Gond
Respondent	State of Chhattisgarh & Ors.
Forum	Supreme Court of India (Criminal Appellate Jurisdiction)

Case Parameter	Details & Judicial Findings
Bench	Hon'ble Mr. Justice Sanjeev Sachdeva & Hon'ble Mr. Justice Augustine George Masih
Date of Judgment	16 November 2026 (2026 INSC 1226)
Primary Legal Issue	Public law compensation for 7+ years of post-acquittal unlawful detention under Article 21
Quantum Awarded	₹30,00,000 (Enhanced from ₹2,00,000 awarded by Chhattisgarh High Court)
Key Systemic Remedy	Nationwide directives to High Courts for mandatory jail inspections & digital integration

2. Complete Factual Matrix & Procedural History

The trajectory of the litigation demonstrates a profound institutional failure wherein communication gaps between legal aid, prison authorities, and judicial registries deprived a citizen of his personal liberty during the prime decade of his youth.

The Criminal Trial and Acquittal

On 7 December 2012, Devilal Gond was arrested in connection with a First Information Report (FIR) registered for murder under Section 302 of the Indian Penal Code (IPC). At the time of his arrest, he was approximately 21 years of age. He was put on trial before the Sessions Court at Rajnandgaon, Chhattisgarh (Sessions Case No. 14 of 2013). By a judgment dated 14 August 2013, the Sessions Judge convicted him under Section 302 IPC and sentenced him to life imprisonment.

Devilal Gond appealed his conviction before the High Court of Chhattisgarh at Bilaspur (Criminal Appeal No. 968 of 2013). On 20 January 2018, the High Court allowed his appeal, set aside the conviction and sentence, and fully acquitted him of all charges. However, during the appellate hearing, the High Court was given the mistaken impression that Devilal Gond was already out on bail. Consequently, instead of issuing an immediate release warrant, the High Court directed under Section 437-A of the Code of Criminal Procedure (CrPC) that his personal and surety bonds furnished at the time of suspension of sentence should remain operative for six months. The State of Chhattisgarh did not challenge the acquittal, making the judgment of 20 January 2018 final.

The Prolonged Unlawful Incarceration

Because the High Court was misinformed regarding his custody status, the order of acquittal was never given operational effect by prison authorities. In 2018, the Superintendent of Central Jail, Durg sent written communications dated 3 April 2018 and 18 June 2018 to the Panel Lawyer of Legal Aid inquiring about the status of the appeal. Due to a breakdown in coordination and verification mechanisms between the jail establishment and legal aid, the information regarding his acquittal never reached the prison administration.

Devilal Gond remained continuously confined in Central Jail, Durg for an additional **7 years, 3 months, and 29 days** after his complete acquittal. The error was uncovered only on 15 May 2025 during a routine records-verification exercise conducted for convicted prisoners. Following a request to the Sessions Judge, Rajnandgaon, a supersession warrant was issued, and Devilal Gond was finally released from jail on 19 May

2025. Arrested at age 21, he was released at age 35, having spent thirteen years behind bars—more than seven of which were entirely without the authority of law.

TABLE 2 · CHRONOLOGY OF THE CASE

Event / Milestone	Date / Details	Impact / Judicial Status
Arrest & Detention	07 December 2012	Arrested under Section 302 IPC at ~21 years of age
Sessions Court Conviction	14 August 2013	Convicted and sentenced to life imprisonment (Sessions Case No. 14/2013)
High Court Acquittal	20 January 2018	Conviction set aside in CRA No. 968/2013; HC mistakenly ordered bonds to remain operative under Sec 437-A CrPC
Institutional Inquiries	April & June 2018	Central Jail Durg sent status inquiries to Legal Aid; zero follow-up or response received
Discovery of Incarceration	15 May 2025	Discrepancy discovered during prison records-verification exercise
Release from Custody	19 May 2025	Supersession warrant issued by Sessions Judge; released at ~35 years of age
High Court Writ Order	01 May 2026	Chhattisgarh High Court (WPCR No. 505/2025) awarded nominal compensation of ₹2,00,000
Supreme Court Judgment	16 November 2026	Supreme Court enhanced compensation to ₹30,00,000 and issued nationwide guidelines

High Court Writ Petition & Inadequate Award

Following his release, Devilal Gond filed a writ petition (WPCR No. 505 of 2025) before the High Court of Chhattisgarh, claiming ₹50,00,000 in monetary compensation for the unlawful deprivation of his liberty. The High Court acknowledged that his continued detention was wholly illegal, arbitrary, and violative of Article 21, observing that procedural formalities and administrative inefficiency could never justify such a severe infringement. However, by an order dated 1 May 2026, the High Court granted a compensation of only **₹2,00,000**. Aggrieved by this nominal sum, Devilal Gond appealed to the Supreme Court of India.

3. Jurisprudential Foundations: Public Law Compensation under Article 21

The Supreme Court analyzed the constitutional remedy of monetary compensation, emphasizing that public law compensation is distinct from private law tort claims and serves both restorative and deterrent functions.

Strict Liability and Inapplicability of Sovereign Immunity

The Supreme Court reaffirmed the seminal constitutional principles established in ***Nilabati Behera v. State of Orissa*** (1993) and ***Rudul Sah v. State of Bihar*** (1983). The Court emphasized that an award of compensation under Article 32 or Article 226 of the Constitution is a remedy in public law founded on strict liability for the contravention of fundamental rights.

> *"Award of compensation in a proceeding under Article 32 by this Court or by the High Court under Article 226 of the Constitution is a remedy available in public law, based on strict liability for contravention of fundamental rights to which the principle of sovereign immunity does not apply, even though it may be available as a defence in private law in an action based on tort."* — **Justice J.S. Verma in *Nilabati Behera v. State of Orissa*** (cited in *Devilal Gond*)

The Court noted that the defense of sovereign immunity—traditionally rooted in private law tort actions such as ***Kasturilal Ralia Ram Jain v. State of U.P.*** (1965)—is completely alien to constitutional remedies. When the State or its functionaries infringe the fundamental right to life and personal liberty guaranteed under Article 21, constitutional courts have a mandatory duty to forge new remedies and grant monetary compensation as an effective palliative.

International Perspectives & Comparative Law

The Supreme Court highlighted that the right to monetary compensation for unlawful arrest or detention is recognized globally and explicitly mandated by Article 9(5) of the International Covenant on Civil and Political Rights (ICCPR), 1966, to which India is a signatory state party:

> *"Anyone who has been the victim of unlawful arrest or detention shall have an enforceable right to compensation."* — **Article 9(5), ICCPR 1966**

Drawing upon the landmark judgment in ***D.K. Basu v. State of W.B.*** (1997), the Supreme Court reviewed jurisprudence from multiple international jurisdictions:

- **Ireland**: Judicial precedents such as *State (At the Prosecution of Quinn) v. Ryan* [1965 IR 70] and *Byrne v. Ireland* [1972 IR 241] established that constitutional rights are substantive guarantees creating an inherent remedy against the State when breached.
- **New Zealand**: In *Simpson v. Attorney General* [1994 NZLR 667] (*Baigent's Case*), the New Zealand Court of Appeal affirmed that pecuniary compensation against the Crown is an essential public law remedy for breaches of the Bill of Rights Act 1990.

TABLE 3 · PUBLIC LAW AND PRIVATE LAW REMEDIES COMPARED

Dimension	Public Law Remedy (Art. 32 / 226)	Private Law Remedy (Civil Suit)
Legal Foundation	Constitutional guarantee under Article 21	Common law tort (false imprisonment / negligence)
Standard of Proof	Strict Liability upon proven factual breach	Proof of specific tort, negligence, or malice
Sovereign Immunity	Completely inapplicable and alien to Article 21	Historically available as a state defense
Primary Purpose	Restorative justice & public duty enforcement	Personal damages & civil injury repair
Effect on Other Remedies	Does not bar civil suit (adjustable against damages)	Standalone civil adjudication

4. Role of Prof. (Dr.) G.S. Bajpai & Law Commission Report No. 277

A crucial dimension of the Supreme Court's reasoning in *Devilal Gond* addresses the systemic void in India regarding statutory compensation for miscarriage of justice. In doing so, the Supreme Court highlighted the seminal contributions of **Prof. (Dr.) G.S. Bajpai**.

Appointment as Amicus Curiae and Comparative Study

In the case of ***Babloo Chauhan @ Dabloo v. State (NCT of Delhi)*** (2017 SCC OnLine Del 12045), the High Court of Delhi examined the plight of individuals wrongfully incarcerated due to malicious prosecution or systemic error. The Delhi High Court appointed **Prof. (Dr.) G.S. Bajpai**—then Registrar and currently Vice-Chancellor of National Law University Delhi—as *Amicus Curiae*.

Prof. Bajpai submitted a comprehensive report titled ***'On Wrongful Incarceration Default in Payment of Fine Suspension of Sentence'***. In his report, Prof. Bajpai undertook an exhaustive comparative examination of legislative frameworks across western democracies:

- **United States of America**: Documented that 32 US states, along with the District of Columbia, had enacted specific statutes providing both monetary and non-monetary compensation to wrongfully incarcerated individuals.
- **United Kingdom & New Zealand**: Detailed statutory compensation schemes and administrative guidelines designed to indemnify victims of judicial error.

The Babloo Chauhan Proceedings in Brief

The underlying appeal, ***Babloo Chauhan @ Dabloo v. State Govt. of NCT of Delhi*** (CRL.A. 157/2013), was heard by a Division Bench of Justice S. Muralidhar and Justice I.S. Mehta. On 15 September 2016 the Court allowed the appeal. By a separate order the same day, it identified three issues of wider importance: wrongful incarceration, default in payment of fine, and suspension of sentence. It appointed **Prof. (Dr.) G.S. Bajpai**, then Professor of Criminology & Criminal Justice and Registrar of National Law University Delhi, as *amicus curiae* to assist it on these questions.

In its order of 30 November 2017, the Court found the law on fines and on suspension of sentence to be fairly settled. On wrongful incarceration, after considering the report's comparison of compensation schemes in the USA, the UK and New Zealand, it observed that India had no dedicated statute or scheme for compensating wrongfully incarcerated persons, and that existing remedies were limited. It requested the Law Commission of India to examine the issue and recommend action to the Government, directed that Prof. Bajpai's report be sent to the Commission's Chairman, and recorded its appreciation of his assistance.

TABLE 4 · CASE NOTE: BABLOO CHAUHAN (DELHI HIGH COURT)

Case Note	Babloo Chauhan @ Dabloo v. State Govt. of NCT of Delhi
Case Number	CRL.A. 157/2013, High Court of Delhi
Bench	Justice S. Muralidhar and Justice I.S. Mehta (Division Bench)
Citations	2017:DHC:7374-DB; 247 (2018) DLT 31; 2017 SCC OnLine Del 12045
Key Dates	15 September 2016: appeal allowed and amicus curiae appointed · 30 November 2017: final order on the wider issues

Case Note	Babloo Chauhan @ Dabloo v. State Govt. of NCT of Delhi
Issues Referred	Wrongful incarceration; default in payment of fine; suspension of sentence (Section 389 CrPC)
Role of Prof. Bajpai	*Amicus curiae*. Prepared the report *On Wrongful Incarceration, Default in Payment of Fine, Suspension of Sentence*, including a comparative study of compensation laws in the USA, the UK and New Zealand
Outcome	Law Commission of India requested to examine wrongful incarceration; report forwarded to its Chairman; this led to Law Commission Report No. 277 (August 2018)

Catalyst for Law Commission Report No. 277

Prof. Bajpai's report demonstrated to the Delhi High Court that while Indian constitutional courts award compensation episodically, there exists no statutory or structured legislative mechanism to compensate victims of wrongful prosecution and incarceration. Consequently, the Delhi High Court requested the Law Commission of India to undertake a comprehensive study.

This culminated in **Law Commission of India Report No. 277**, titled ***"Wrongful Prosecution (Miscarriage of Justice): Legal Remedies"*** (August 2018). The 277th Report drew heavily upon international standards, including the 1988 Canadian *Federal/Provincial Guidelines on Compensation for Wrongfully Convicted and Imprisoned Persons*, recommending:

- **Pecuniary Assistance**: Monetary awards covering loss of livelihood, earnings, future earning capacity, and property loss.
- **Non-Pecuniary Assistance**: Compensation for loss of liberty, mental and physical indignities, damage to reputation, and disruption of family relationships, coupled with non-monetary services such as counseling, vocational skill training, and removal of legal disqualifications for employment.
- **Special Courts Framework**: Creation of dedicated legal machinery to adjudicate compensation claims expeditiously without forcing victims into prolonged civil litigation.

In *Devilal Gond*, the Supreme Court cited Prof. Bajpai's report and Law Commission Report No. 277 to illustrate that in the absence of an enacted statutory scheme, constitutional courts must step in forcefully under public law jurisdiction to ensure victims receive proportionate, realistic, and structured monetary relief.

5. The Supreme Court's Decision: Enhanced Quantum & Rehabilitation Scheme

Evaluating the facts of the case, the Supreme Court held that the explanation provided by the State of Chhattisgarh revealed complete remissness, institutional dysfunction, and a callous disregard for personal liberty.

Enhancement of Compensation to ₹30 Lakhs

The Supreme Court held that Devilal Gond was wrongfully confined during the prime youth of his life (from age 28 to age 35). The Court observed that he suffered immense physical and mental harshness, indignities

of incarceration, loss of consortium, loss of livelihood, and loss of advancement opportunities in education and skill development.

Modifying the High Court order dated 1 May 2026, the Supreme Court enhanced the total compensation to **₹30,00,000 (Rupees Thirty Lakhs)**, covering all heads of pecuniary and non-pecuniary losses.

Structured Disbursement Scheme for Financial Independence

To ensure that the compensation is not dissipated, exploited, or lost, and to secure Devilal Gond's long-term rehabilitation and financial independence, the Supreme Court laid down specific financial directions under the supervision of the Legal Services Authority:

Element	Direction of the Court
Payment Deadline	The State of Chhattisgarh must remit ₹30,00,000 directly via electronic transfer (RTGS/NEFT/IMPS) into Devilal Gond's bank account within four weeks (after adjusting any amount already paid).
Immediate Cash Transfer	The receiving bank must immediately credit **₹5,00,000** into his savings bank account for immediate needs.
Auto-Renewing Fixed Deposit	The remaining balance of **₹25,00,000** must be placed in an interest-bearing Fixed Deposit (FD) account with an auto-renewal facility.
Individual Ownership	The FD must be held strictly in the individual name of Devilal Gond; no joint name additions are permitted.
Monthly Interest Payout	The monthly interest accruing on the FD must be credited directly into his savings bank account via Electronic Clearing System (ECS) to provide a steady monthly income.
Restrictions on Encumbrance	No loan, advance, premature withdrawal, or discharge of the FD is permitted without prior written permission from the Secretary, District Legal Services Authority (DLSA), Mohla Manpur, Ambarbagh Chowki, Chhattisgarh.
Emergency & Asset Creation Approvals	The DLSA Secretary is empowered to grant permission for premature FD withdrawal solely for medical emergencies or the creation of long-term revenue-generating assets.

6. Systemic Directives to High Courts Across India

Recognizing that Devilal Gond's case was not an isolated incident—citing its earlier decision in ***Sohan Singh @ Bablu v. State of M.P.*** (SLP (Crl) No. 11244 of 2025, judgment dated 08.09.2025, where ₹25,00,000 was awarded for 4 years and 7 months of post-sentence detention)—the Supreme Court issued sweeping administrative directives to prevent future recurrences across India.

The Supreme Court directed that copies of the judgment be forwarded to the Registrar Generals of all High Courts in India to be placed before their respective Chief Justices to consider issuing instructions modeled after the Madhya Pradesh High Court directives of 20 November 2025.

Mandatory Physical Jail Inspection Framework

High Courts are directed to institute periodic physical jail inspections and certification mechanisms:

- **Monthly PDJ Inspections**: Principal District & Sessions Judges (PDJs) across all district establishments must conduct physical inspections of district jails on a monthly basis.
- **Weekly DLSA Inspections**: Secretaries of District Legal Services Authorities (DLSAs) must conduct personal physical jail inspections on a weekly basis.
- **Mandatory Written Certifications**: Inspection reports submitted to the High Court Registrar (J-I) by the end of each month/week must specifically certify:
  - The exact date of physical jail inspection.
  - Whether any convict remains languishing in jail after completing their sentence or after acquittal.
  - Whether all convicts are undergoing sentence strictly according to a valid, operative sentence warrant or supersession warrant.
- **Same-Day Transmission & Compliance**: Acquittal judgments and release certificates prepared under Section 429 BNSS (read with Rule 315 of Criminal Courts Rules) must be emailed on the exact same day of pronouncement simultaneously to the jail, District Establishment, and DLSA. Trial courts and DLSAs must submit same-day compliance reports accompanied by jail certificates confirming prison records were updated and acquitted persons released on the same day.

Implementation of the 'Online Criminal Justice Ecosystem'

The Supreme Court urged all High Courts to consider establishing an integrated digital platform akin to Madhya Pradesh's **Online Criminal Justice Ecosystem**. This system integrates data sharing across Police, Courts, Prisons, Prosecution, Forensics, and Hospitals, ensuring:

- Real-time electronic transmission of bail orders, acquittal judgments, and supersession warrants directly to prison servers.
- Elimination of human communication delays and manual verification gaps between legal aid lawyers, court registries, and prison wardens.
- Automated tracking of prisoner custody status to instantly highlight unauthorized overstays.

7. Analytical Synthesis & Strategic Implications

The decision in *Devilal Gond v. State of Chhattisgarh* represents a monumental advance in the constitutional protection of personal liberty in India.

TABLE 5 · BEFORE AND AFTER DEVILAL GOND

Key Reform Dimension	Pre-Devilal Gond Status	Post-Devilal Gond Mandate
Public Law Compensation Quantum	Nominal, ad-hoc awards (e.g., ₹2,00,000)	Realistic, substantive benchmark (~₹4,00,000 per year of overstay)
Asset Protection & Rehabilitation	Unstructured lump-sum payouts vulnerable to fraud	DLSA-supervised FD capital + monthly ECS interest payout
Jail Oversight & Monitoring	Ad-hoc or paper-based administrative reviews	Mandatory weekly (DLSA) and monthly (PDJ) physical inspections

Key Reform Dimension	Pre-Devilal Gond Status	Post-Devilal Gond Mandate
Information & Transmission Flow	Physical post / manual legal aid verification	Real-time integrated Online Criminal Justice Ecosystem

- **Setting Realistic Quantum Benchmarks**: By increasing compensation from ₹2,00,000 to ₹30,00,000 for ~7.33 years of illegal confinement (calculating to roughly ₹4,00,000 per year of post-acquittal detention), the Supreme Court has set a firm judicial precedent that public law compensation must be realistic, substantive, and proportionate to the harm suffered rather than symbolic.
- **Protective Rehabilitation Jurisprudence**: The Court's structured FD scheme reflects a compassionate understanding of post-incarceration vulnerability. Individuals released after prolonged confinement face severe social and financial disorientation; structuring compensation into liquid immediate funds and protected capital generating monthly income prevents financial exploitation while securing sustainable livelihood.
- **Closing the Communication Gap**: By mandating digital integration through the Online Criminal Justice Ecosystem and holding PDJs and DLSA Secretaries directly accountable via weekly/monthly physical inspections, the Supreme Court has transformed judicial oversight from reactive adjudication to proactive administrative prevention.

Sources and References

[1] Devilal Gond v. State of Chhattisgarh & Ors., 2026 INSC 1226 (Supreme Court of India, 16 November 2026). https://indiankanoon.org/doc/65309613/

[2] Babloo Chauhan @ Dabloo v. State Govt. of NCT of Delhi, CRL.A. 157/2013, order dated 30 November 2017 (Delhi High Court). https://delhihighcourt.nic.in/app/case_number_pdf/2017:DHC:7374-DB/ISM30112017CRLA1572013.pdf

[3] Prof. (Dr.) G.S. Bajpai, On Wrongful Incarceration, Default in Payment of Fine, Suspension of Sentence: A Report by Amicus Curiae before the High Court of Delhi. https://profgsbajpai.in/Full%20Report_Amicus%20Curiae.pdf

[4] Law Commission of India, Report No. 277, Wrongful Prosecution (Miscarriage of Justice): Legal Remedies (August 2018). https://advocatetanmoy.com/wrongful-prosecution-legal-remedies-law-commission-of-india-report/

End Note: Writings of Prof. (Dr.) G.S. Bajpai on Wrongful Prosecution

Prof. Bajpai's engagement with wrongful prosecution extends well beyond his 2017 amicus report. The works below, listed in order of publication, trace that body of scholarship from the Delhi High Court proceedings to the present.

TABLE 6 · SELECTED WRITINGS ON WRONGFUL PROSECUTION

Year	Work	Type and Publication
2017	On Wrongful Incarceration, Default in Payment of Fine, Suspension of Sentence	Amicus Curiae report before the High Court of Delhi in Babloo Chauhan; NLUD Press
2019	"Acquittal of accused in Samjhauta Express case underlines the need to create a cadre of professional prosecutors"	Op-ed, The Indian Express, 29 March 2019
2021	"The law should deter wrongful prosecution"	Op-ed, The Tribune, 19 June 2021
2024	Wrongful Conviction (with Sidharth Dahiya)	Book, Bloomsbury India, New Delhi; reviewed in the Indian Journal of Criminology, Vol. 52(2), 2024
2025	"Every acquittal tells a tale of wrongful prosecution" (with Ankit Kaushik)	Column, Bar & Bench, 8 August 2025
2023	"Labeling the Innocent: A Criminological Analysis of Wrongful Prosecution"	Conference paper (abstract published by the Asian Law Institute, National University of Singapore)

- **Public comment:** in September 2018 he told Asia Times that Law Commission Report No. 277 erred in equating wrongful prosecution with malicious prosecution, since many faulty prosecutions involve no malice.
- **Academic events:** NLU Delhi held a National Conference on Wrongful Prosecution: Rights, Protection and Assistance on 18 November 2017, and Prof. Bajpai moderated a panel discussion on Report No. 277 on 1 October 2018.
- **Recent commentary:** a video talk on wrongful prosecution and delayed justice, published by SCC Online on 25 January 2026.