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# **ANALYSIS OF ABETMENT OF ABETMENT AS AN OFFENCE**

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LLM (CRIMINAL LAW)

## **CHAPTER -1**

### **INTRODUCTION**

#### **STATEMENT OF PROBLEM**

The analysis of "abetment of abetment of an offence" represents a significant yet underexplored challenge within contemporary legal studies. This intricate legal concept, situated at the intersection of criminal law, provides a nuanced framework for understanding aiding, abetting, and conspiring in criminal acts. Despite its complexity, a comprehensive analysis of this concept is conspicuously absent in existing legal literature and jurisprudence, leading to ambiguity and inconsistent interpretations. This study seeks to fill this critical knowledge gap by establishing a comprehensive theoretical framework, exploring its practical application in real-world legal cases, assessing its legal implications, and conducting a comparative analysis across different legal systems. Through this research, we aim to shed light on the complexities and implications of the abetment of abetment doctrine, contributing to a more informed and thorough understanding of this subject within the legal community and its potential for legal reform and enhancement.

#### **RESEARCH QUESTIONS**

1. Whether Abetment of abetment as an offence ought to be punished?
2. Whether jurisdictions of other countries criticise or support the validity of double inchoate crimes in general?
3. Whether there is need for revision of the present statute on abetment in Indian Penal Code, 1860 if any, can be made?

## **RESEARCH OBJECTIVES**

The primary aim of this project is to employ a dual-pronged strategy for the analysis of the concept of "abetment of abetment." The first facet of this approach involves assessing the significance of this offense in terms of its contribution to the improvement of the criminal justice system. The second facet involves a comprehensive examination of the criticisms and limitations associated with this concept. By doing so, we can provide recommendations for potential revisions to the existing Indian statute with the ultimate goal of enhancing its effectiveness and applicability. In essence, we are seeking to both highlight the positive aspects of this legal concept and identify areas where it can be improved for the benefit of the justice system.

## **HYPOTHESIS**

Double inchoate crimes though can be categorised into many categories, will refer to 'abetment of abetment' specifically for the purpose of this paper.

## **CHAPTER 2**

### **ABETMENT AS IN INCHOATE OFFENCE IN INDIA**

The Indian legal framework, the concept of inchoate crimes is elucidated. In particular, two such inchoate crimes, namely the "attempt to commit a crime" and "abetment of the commission of a crime,"<sup>1</sup> fall within the category of incomplete crimes, primarily bearing the potential for harm rather than actualized harm. These offenses are also categorized as crimes that are detrimental to social security and overall well-being<sup>2</sup>. In essence, inchoate crimes allow for the punishment of an individual even when they have not successfully executed the intended criminal act. The principal objective behind penalizing inchoate crimes is to enable the legal system to intervene before an individual completes the underlying criminal act<sup>3</sup>.

In many American jurisdictions, inchoate offenses are treated as distinct substantive crimes, separate from the completed crimes they are associated with. Consequently, the definitions of inchoate crimes such as abetment and attempt are broadly formulated to encompass all actions that lead to the commission of any completed crime.

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<sup>1</sup> Attempt to murder is an offence (section 307); so is attempt to commit culpable homicide (section 308); so is attempt to commit suicide (section 309); so is assault or criminal force in attempt wrongfully to confine a person (section 357); and so is attempt to commit robbery (section 393)] IPC 1860

<sup>2</sup> In Re: Maragatham alias Lakshmi and Anr. 1961-74-LW678, (1962)2MLJ286

<sup>3</sup> Section 107-120, IPC 1860

In its broader context, inchoate liability pertains to assigning criminal responsibility for behavior that leads to but does not directly cause forbidden consequences. The criminal law incorporates general principles for attempt and abetment to apply to specific offenses, thereby broadening their scope. On the other hand, the narrower interpretation of inchoate liability is concerned solely with attributing liability for attempting and abetting in the commission of specific offenses. This is referred to as relational inchoate liability or simply relational liability, which constitutes a subset of inchoate liability in the broader sense. This paper focuses on relational liability, particularly in the context of attempt and abetment as relational offenses attached to specific part offenses.

The concept of inchoate offenses has evolved over time, as the courts, in response to an increasing number and variety of criminal cases, recognized the need to accord them significance. For instance, in the case of *R v Higgins*<sup>4</sup> in the early 19th century, judges ruled it as a case of criminal attempt, even though it was, in reality, a classic instance of incitement, where the defendant encouraged a servant to steal from their master. This case can be seen as establishing incitement as a distinct inchoate offense that can be linked to specific part crime<sup>5</sup>.

An individual who does not directly commit a crime may, nevertheless, be deemed guilty of abetment if they command, encourage, induce, request, or assist another person in carrying out the criminal act. Chapter V of the Indian Penal Code outlines the legal provisions governing the liability of individuals who are considered to have abetted the commission of an offense. It is commonly recognized that many crimes require the cooperation of others, as working in collaboration instills confidence in the offender that may not exist when acting alone. In such cases, a third party is clearly involved in persuading another to commit the crime. It becomes necessary to determine the extent of involvement of such an individual, and this is why the legislature has established abetment as a distinct offense.

Section 107<sup>6</sup> specifies that a person abets the commission of an act under the following circumstances:

1. By instigating another person to carry out that act.
2. By engaging in a conspiracy with one or more persons to commit the act, and if any act

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<sup>4</sup> (1801) 2 East 5.

<sup>5</sup> See McAuley and McCutcheon *Criminal Liability* (Round Hall Press 2000), also See also Law Reform Commission of Canada *Secondary Liability: Participation in Crime and Inchoate Offences* (Working Paper 45 1985)

<sup>6</sup> Section 107, Indian Penal Code, 1860.

or omission takes place because of that conspiracy.

3. By aiding in the commission of the act.

### **2.1) THE RATIONALE OF INCHOATE OFFENSES:**

There are two primary justifications for inchoate offenses:

One rationale underscores that individuals who attempt or aid in an attempted murder are morally as culpable as those who actually commit the murder. The mere fact that the victim does not die does not diminish the moral blameworthiness of those who intended to kill the victim, whether by their own hands or by another's. For instance, a judge in 2007, while sentencing an attempted murder case, is reported to have questioned why the defendant should “avoid a life sentence merely because [he] is a bad shot”.<sup>7</sup>

The second justification for inchoate offenses argues that law enforcement should be able to intervene before crimes are completed and process potential perpetrators through the criminal justice system. This approach is believed to better serve the goal of preventing harm, as opposed to waiting until the crime is already committed before taking action to enable prosecution. In other words, as one author contends, “Society should not be forced to choose between preventing the crime and prosecuting the offender”<sup>8</sup>.

### **2.2) ABETMENT BY INSTIGATION:**

The concept of abetment in this context is broadly defined and encompasses the active involvement of the abettor before the actual commission of the crime<sup>9</sup>. Central to this offense is the requirement that the abettor substantially aids the principal offender. The abettor facilitates the actions of the culpable agents, and the presence of mens rea, or criminal intent, is a crucial precondition. In the case of *Shrilal vs. Madhya Bharat*, it was established that convicting an individual of abetting a crime necessitates not only demonstrating their involvement in innocuous steps of a transaction but also connecting them to steps that are inherently criminal.

The initial form of abetment, as mentioned earlier, is through instigation, which involves provoking, urging, or persuading someone to commit an act. Instigation can take various forms, and the law does not prescribe a specific form, but a close causal relationship between the

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<sup>7</sup> “Man Gets Life Sentence for Attempted Murder” *The Irish Times* 5 May 2007.

<sup>8</sup> Enker “Mens Rea and Criminal Attempt” (1977) *Am B Found Res J* 845, at 850

<sup>9</sup> Instigation as defined by Black Law’s Dictionary

instigation and the subsequent act is essential. For instance, if A declares to B that they are going to kill C and B merely responds without actively encouraging the act, B cannot be considered to have instigated A.

In the case of Ram Kumar vs. State of Himachal Pradesh,<sup>10</sup> it was clarified that instigation has a broad meaning, extending to instigation through the conduct of an individual, as seen in the conduct of a husband abetting the commission of rape on his wife. In some instances, the approval or endorsement of an act can also constitute instigation. For example, if a woman is preparing for committing sati, and people chant praises in approval, it would be considered a case of instigation by approval in that particular circumstance

### **2.3) ABETMENT BY CONSPIRACY:**

A person is deemed to abet the commission of a crime through conspiracy when they form an agreement with one or more individuals to engage in an unlawful act, and some action is taken in pursuit of that agreement.

For example, consider a scenario where A, who is a servant, collaborates with thieves to keep the door of his master's house open at night for the purpose of committing theft. In adherence to this agreement, A keeps the doors open, and a theft occurs. In this case, A is culpable for abetment by conspiracy.

In the legal case of Saju vs. State of Karnataka,<sup>11</sup> it was ruled that to establish abetment by conspiracy, the prosecution must demonstrate that the abettor has incited the undertaking of a specific action as part of a conspiracy to carry out the illegal act or omission.

### **2.4) THE SIGNIFICANCE OF MENS REA FOR ABETMENT:**

The mental state, known as mens rea or guilty intention/knowledge, is a critical component in abetment cases. To convict an individual of aiding in the commission of a crime, it is crucial to establish their active participation in the transaction with a guilty state of mind. For the offense of abetment to be constituted, there must be mens rea or a shared intention, as abetment cannot occur without it. This intention must be connected to the crime, and the assistance provided must

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<sup>10</sup> AIR 1995 SC 1965

<sup>11</sup> AIR 2001 SC 175

be immediate and more than mere passive agreement.<sup>12</sup> Therefore, inchoate offenses function to impose penalties based on the potential or imminent criminal harm posed by an individual with a culpable state of mind.<sup>13</sup>

## **CHAPTER – 3**

### **DOUBLE INCHOATE CRIMES**

In the context of a theory of inchoate liability that emphasizes an individual's criminal intent, certain courts have broadened the scope of actions that can lead to liability, allowing for intervention and permitting the prosecution and conviction of double inchoate offenses. Interestingly, the Indian Penal Code rarely addresses the question of whether one inchoate crime could be the subject of another (although it does notably focus on abetment of abetment as an offense). This absence of statutory guidance in characterizing inchoate-crime concepts has empowered courts to "pyramid" inchoate crimes to fill the gaps in penal codes.

When courts create double inchoate offenses, they exercise a level of authority akin to earlier courts that established common-law crimes<sup>14</sup>, extending liability to actors whose criminal intent the courts deem sufficiently dangerous or egregious to warrant judicial intervention. While theoretically, the pyramiding of the two traditional inchoate offenses<sup>15</sup>, as described earlier, could result in various double inchoate offenses, one specific category has undergone extensive criminal litigation and will be explored further, namely, the abetment of abetment.

#### **3.1) ABETMENT OF ABETMENT:**

This scenario involves A abetting B, who subsequently abets C to engage in criminal activity. The Indian Penal Code lacks a specific provision for such cases; however, they are subject to punishment through the interpretation of the statute.

As previously mentioned, Section 107 addresses the "Abetment of a thing," which pertains to any action that results in the commission of the targeted or resulting crime. This concept of "a thing" can encompass abetment itself, leading to the possibility of double inchoate liability. This

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<sup>12</sup> Shaik Ibrahim vs The State Of A.P 2005 (1) ALD Cri 163, I (2005) DMC 535

<sup>13</sup> Law reform Commission Report ,Canada

<sup>14</sup> Arnold, Criminal Attempts-The Rise and Fall of an Abstraction, 40 YALE L.J.53, 74-76 (1930)

<sup>15</sup> Likewise, categories could be attempt to attempt, attempt to conspire, conspiracy to attempt.

framework has enabled the courts to handle a wide range of cases involving instigation to conspire for a crime, instigation to intentionally aid a crime, conspiring to instigate others to commit a crime, conspiring to intentionally aid another, or intentionally aiding in a conspiracy to commit a crime. The interpretation of these scenarios is subjective and varies from case to case. To comprehend the logic behind these offenses and the criticisms they face, it is essential to analyze the following illustrations depicting the same.

For instance, if A instigates B to conspire with C and D to commit a specific crime, B, C, and D will be held liable for conspiracy initially. However, A will also be held accountable for instigating B, who then acted in furtherance of A's instigation (whether A will be liable for the actual crime committed is addressed in a later section).

Now, in the scenario described above, A initiated the criminal activity, setting in motion a sequence of events that ultimately resulted in the commission of the crime. Even though A did not act directly but allowed others to conspire and commit the crime, it is crucial to hold A accountable. This underscores the necessity of imposing liability on individuals involved in double inchoate crimes.

### **3.2) ABETMENT OF ABETMENT : A MUCH OFTEN CONDUCTED CRIME:**

A person who does not directly commit a crime may, nonetheless, instruct, encourage, induce, request, or assist a third party in carrying it out, thereby incurring guilt for abetment. Such an individual should be legally punished for introducing the idea that influenced another to commit a crime. Moreover, within the chain of individuals involved in the events, there could be yet another person who abets someone else, usually the one who actually commits the crime. In this case, it is crucial to penalize the first person who initiated the idea, as the absence of their instigation would have prevented the initial crime. Although their role is limited to an event that occurred well before the crime was committed and is unrelated to the actual commission of the crime, it remains necessary to hold them accountable for introducing the idea that prompted another to abet yet another. This illustrates a clear intention on the part of an individual to further a criminal intent. The mens rea for this offense is the specific intent to encourage another person who, in turn, might incite another to commit a particular completed offense.

Law enforcement agencies should be capable of intervening well before crimes are actually carried out and processing potential perpetrators through the criminal justice system. Waiting until the crime is actually committed is not advisable. The person who abets or attempts to commit murder is morally and legally as culpable as the person who commits the murder. Those who intend harm to others in any way must be held accountable; allowing them to go free is akin to leaving the mastermind behind the unpunished act. The Indian Penal Code stipulates that abetment of an offense is itself an offense, and the abetment of such an abetment is likewise an offense. For instance, if A instigates B to incite C to murder Z, and B then incites C to commit the murder, with C carrying it out as a result of B's instigation, B is liable for punishment for murder under Section 109 of the Indian Penal Code. Additionally, since A incited B to commit the offense, A is also subject to the same punishment. Importantly, whether the targeted act is actually executed or not is irrelevant. To establish the offense of abetment, it is not necessary that the effect required to constitute the offense should be realized; it hinges on the instigation itself and not its impact on another person (as provided by Section 108, IPC).

### **3.3) CRITICISM FOR ABETMENT OF ABETMENT (as a punishable offence) OUTSIDE**

#### **INDIA:**

Despite the application of the double inchoate concept, notably abetment of abetment, by several federal and state courts, the majority of jurisdictions have not embraced this practice. Critiques of convictions for abetment of abetment as "logical absurdities" from the nineteenth and early twentieth centuries continue to hold sway and influence many court decisions.

However, the abstract nature of the logical-absurdity argument has only recently faced criticism from scholars and jurists. Consequently, some recent decisions that reject the recognition of double inchoate offenses have cited the absence of explicit legislative intent to authorize courts to essentially create crimes by combining statutory inchoate offenses. This argument suggests a due process violation resulting from the defendant's lack of notice. Moreover, apart from these considerations, several recent decisions and commentaries have found fault with the use of abetment of abetment as a separate crime, deeming it cumbersome and unnecessary.

## **CHAPTER -4**

### **CONCLUSION**

Criminal Attempt and Abetment, two inchoate crimes, involve conduct that falls short of the completed object offense. The development of these offenses was necessary to address and bring under scrutiny crimes that, while incomplete, still warrant punishment for those involved. The Indian Penal Code, 1860, provides specific definitions and punishments for both offenses, as explained earlier.

Double inchoate crimes have emerged as a distinct field that calls for the punishment of those involved. Dealing with a multitude of incomplete offenses that subsequently result in another incomplete offense leading to the commission of a completed crime poses challenges in the legal landscape. However, the Indian Penal Code has addressed this issue with the concept of abetment of abetment under Section 108, which deals with abetment of an offense that could be abetment itself. It is essential to punish every individual who plays a role, whether through action or instigation, in the commission of an unlawful act.

Many jurisdictions have failed to incorporate this concept into their penal codes, leading to difficulties in the judicial handling of such matters and a lack of a concrete legal framework. For them, it remains a subjective matter. While the concept is inherently complex, the absence of specific statutes further complicates the situation. The concept of double inchoate crimes faces criticism due to the lack of explicit legislative intent and concerns related to due process, as individuals should be aware of the criminality of their actions. It is crucial that the existing statute on inchoate liability amends its sections to include clear criteria for establishing double inchoate liability, reducing the need for extensive judicial intervention and ensuring a more defined legal framework for the offense.

Therefore, the punishment of abetment of abetment as a double inchoate crime should be mandated under all circumstances and cases. This ensures that no individual involved in the initiation and facilitation of a crime goes unpunished, forming the basis of any effective criminal justice system.

### **RECOMMENDATION**

If Section 107<sup>16</sup> were to be revised to include a clear criterion for determining the validity of a double inchoate offense (such as abetment of abetment in this case), it would significantly simplify the decision-making process for the courts. The problem with courts that have relied on the arguments of logical absurdity and legislative intent is that they have overlooked the crucial question of whether the acts before them warrant punishment. Instead, they have initiated their inquiry by examining whether the existing substantive inchoate statutes in their jurisdictions allow for the punishment of these acts.

Conversely, some courts that have acknowledged the legitimacy of double inchoate crimes have done so without conducting a thorough examination of their necessity in light of attempt and abetment statutes. While double inchoate crimes may be a valuable judicial tool in certain situations, they may be unnecessary in others.

However, this proposed revision faces a practical challenge. Ideally, legislatures should expand existing inchoate concepts whenever possible, rather than routinely resorting to prosecutions for double inchoate offenses. Despite a growing recognition of double inchoate constructions within the judicial and scholarly communities, there are still significant barriers to their widespread adoption. Therefore, courts that find the concept of double inchoate constructions logically perplexing are likely to continue dismissing them.

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