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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ **W.P.(CRL) 720/2025 & CRL.M.A. 6662/2025**

RAVINDER RANA

.....Petitioner

Through: Mr. Vishal Gosain, Ms. Anushka Baruah, Mr. Sachin Tokas, Mr. Ajunee Singh, Advocates.

versus

STATE (NCT OF DELHI)

.....Respondent

Through: Mr. Amol Sinha, ASC for the State with Mr. Kshitiz Garg, Mr. Ashvini Kumar, Mr. Manan Wadhwa, Mr. Anshul Sharma, Mr. Amit Kr. Jain, Ms. Komal Chauhan, Advocates.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

25.09.2025

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1. The present petition filed under Article 226 of the Constitution of India, assails the minutes of meeting dated 23rd February, 2024 of the Sentence Review Board¹, and the letter dated 15th October, 2024 issued by Lt. Governor of the National Capital Territory of Delhi, whereby the Petitioner's request for premature release was rejected.

2. The Petitioner is a convict serving life imprisonment for conviction under Sections 302 & 307 of the Indian Penal Code, 1860 and Section 27 of the Arms Act, 1959, in FIR/CBI No. RC-1(5)/2005/SCU-1 for committing the murder of his two colleagues (CISF Personnel) by gunshots. The Trial Court had convicted the Petitioner and sentenced him to life imprisonment

¹ "SRB/the board"



by judgment dated 27th February, 2013. In Criminal Appeal No. 584/2013, this Court, by judgment dated 19th August, 2014 dismissed the appeal. The Petitioner's challenge to the said judgment was dismissed by the Supreme Court on 26th October, 2015.

3. Upon becoming eligible for premature release as per the policy dated 16th July, 2004, issued by the Government of NCT of Delhi,² the case of the Petitioner was considered and rejected by minutes of meeting dated 14th December, 2022 and 23rd February, 2024 which are assailed on the ground that they do not conform to the applicable legal framework, including the 2004 Policy and the Delhi Prison Rules, 2018, and that the rejection is based on insufficient reasoning, without due consideration of relevant reformatory indicators and positive finding in Social Investigation Report. The impugned minutes dated 23rd February, 2024 read as follows:

“ITEM NO. 108

RAVINDER RANA S/O SH. KANWAR LAL-AGE-42 YRS.

Ravinder Rana S/o Sh. Kanwar Lal (Ex CISF Personnel) is undergoing life imprisonment in case FIR/CBI No. RC-1(S)/2005/SCU-1, U/S 302/307 IPC & 27 Arms Act, P.S. C.B.I., Delhi for committed murder of his 02 colleagues (CISF personnel) by gun shots.

The convict has undergone:

Imprisonment of 18 years, 08 months & 09 days in actual and 21 years, 04 months and 23 days with remission.

This case has been considered under the guidelines-order dated 16.07.2004 issued by the Govt. of NCT of Delhi i.e. policy that was existing on the date of conviction.

Conclusion:

The Board considered the reports received from Police and Social Welfare Departments and took into account all the facts and circumstances of the case under which the crime was committed i.e. being personnel of disciplined paramilitary force had murdered two of

² “2004 Policy”



his colleagues (CISF personnel) by gun shots while posted at Indian Embassy, Kathmandu, Nepal, the gravity, perversity and nature of the crime etc. It is noted by the Board that the convict is in any case availing parole and furlough as per rules/law & his connection in the society are rooted. The Board after discussion accordingly unanimously REJECTS premature release of convict Ravinder Rana S/o Sh, Kawar Lal.”

4. The Court has heard the submissions made by the Counsel for the Petitioner and has perused the police report, the Social Investigation Report and the impugned minutes. It is further noted that as per the nominal roll dated 02nd May, 2025, the Petitioner has already undergone 18 years 09 months and 28 days of actual incarceration and 21 years, 6 months, and 14 days including remission. The Petitioner has been granted paroles and furloughs on nearly 23 occasions during his incarceration, and his conduct during each of these periods has been reported to be satisfactory. Moreover, the conduct of the Petitioner inside the prison has also been found satisfactory, except for a punishment dated 16th June, 2013. The nominal roll also reflects that no other criminal cases are pending against the Petitioner. The Social investigation report dated 25th June, 2024 mentions that the Petitioner’s case appears to be fit for positive consideration by the SRB. The Probation Officer has also recommended the premature release of the Petitioner.

5. Despite these positive indicators, the Board has rejected his request citing the gravity and brutality of the offence, the possible social impact of the release of the convict and opposition by the police. Additionally, the board has placed undue reliance on the Petitioner’s unsatisfactory conduct, on account of a solitary punishment reflected in the nominal roll dated 16th June, 2013, which is more than a decade old, for misbehaving with staff.



The nominal roll, on the contrary, explicitly describes his conduct as satisfactory, and there is no record of any further misconduct, either during his incarceration or while on parole or furlough. Further, the Petitioner has also been shifted to a semi-open jail.

6. Significantly, the Board's order does not meaningfully engage with the reformatory progress of the Petitioner, as documented in the Social Investigation Report and the opinion of the Probation Officer, both of which support a positive consideration of his case. These reports suggest that the Petitioner has shown signs of rehabilitation and may be reintegrated into society as a law-abiding citizen.

7. In *Santosh Kumar Singh v. State*,³ this Court has recently examined the approach adopted by the SRB in considering cases of premature release. The approach was found lacking in terms of legal compliance, reasoning, and adherence to the reformatory framework envisaged under Rule 1244 of the Delhi Prison Rules, 2018. It was, *inter alia*, emphasised that while the gravity of the offence may be a relevant factor, it cannot be the sole or overriding basis for rejection, and that the SRB is required to assess reformation, conduct, and likelihood of reintegration. Further, in the case of *Rajo v. State of Bihar*,⁴ the Supreme Court had also held that while the nature of the offence and its societal impact are relevant considerations for the SRB, the same cannot be the sole basis for continued incarceration.

8. Upon consideration of the submissions and perusal of the impugned minutes, in light of the legal principles discussed above, this Court is of the view that the reasons recorded in the impugned minutes suffer from the

³ 2025:DHC:5138

⁴ 2023 SCC OnLine SC 1068



same infirmities as those discussed in ***Santosh Kumar Singh***. The decision appears to be founded principally on the nature of the offence, societal impact and the objection by the police, without meaningful consideration of the Petitioner's jail conduct, psychological assessments (if any), or any evidence indicating the absence of reform. For these reasons, the Court finds the SRB's decision to be inadequately reasoned and contrary to the settled principles governing premature release.

9. Accordingly, in view of the above and in light of the judgment of this Court in ***Santosh Kumar Singh***, the impugned SRB minutes dated 14th December, 2022 and 23rd February, 2024 are set aside *qua* the Petitioner. The matter is remanded back to the SRB for reconsideration in accordance with law, keeping in mind the principles, and observations made hereinabove, without being influenced by the earlier decision.

10. The SRB shall convene a fresh meeting and pass a reasoned order within a period of eight weeks from the date of this order.

11. The Petition is disposed of in the above terms.

SANJEEV NARULA, J

SEPTEMBER 25, 2025/ab