

## Public opinion vs. due process: Media trials and their impact on Narcotics investigations and courtroom justice in India

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### Abstract

All people accused of crimes are innocent until proven guilty a fundamental basic tenet of criminal justice systems in democratic societies generally. But since the emergence of 24-hour news stations and digital media, public engagement has markedly increased with the investigations of crimes, especially in high-profile narcotics offences. In India, the narcotics offences are governed mainly by the stringent provisions of the Narcotic Drugs and Psychotropic Substances Act, 1985, which imposes detailed procedure on investigating, arresting, searching, seizing, and prosecuting people. While the freedom of the press is constitutionally protected under Article 19(1)(a) of the Constitution of India, and Article 21 guarantees the right to life and personal liberty, which judicial interpretation has broadened to include the right to a fair and impartial trial. The research problem highlighted in this paper stems from the rising issue of media hysteria fear that too much media interest and gossip can undermine investigative secrecy, generate biased narratives that are detrimental to the accused, as well as exert pressure indirectly on investigative bodies including the Narcotics Control Bureau, as well as on judicial bodies. One of the principal aims of the study is to research media trials, specifically the construction and impact of media trial narratives, assess laws that govern investigations into narcotics, and assess public perception of media narrative bias. This study employs a doctrinal methodology relying on legislation, judicial case law, academic research, and policy reports related to media regulation and criminal justice. The paper has been structured in terms of how the concept of media trials was first introduced as a legal issue, followed by the legislative environment for narcotics investigations, constitutional protections regarding press freedom and access to fair trials, the consequences of media portrayals in criminal investigations and courtrooms, and the proposal of new policy measures for media practice aimed at responsible news coverage in line with the independence of judicial independence and due process.

**Keywords:** Media trials, criminal trials, investigations, narcotic drugs, criminal justice

### Introduction

"The media has a right to speak, but it also has a responsibility not to turn the courtroom into a circus. The principle of presumption of innocence is the foundation of criminal justice, and no amount of TRP ratings can justify its violation."<sup>[1]</sup>

#### -R.K. Anand v. Delhi High Court (2009)

In summer 2020, the arrest of Bollywood actor Rhea Chakraborty in connection with Sushant Singh Rajput's death drove Narcotic Drugs and Psychotropic Substances Act (NDPS) investigations into Indian police into a media frenzy. News media went into overdrive for 24 hours, social media fuelled allegations of drug peddling and public outrage demanded swift convictions before any trial could even begin. And this is just what happened in the current "media trial", in which constant coverage is based on guilt and a fundamental principle of criminal justice is no longer in place: innocence until proven guilty.<sup>[2]</sup>

In India, NDPS cases are very much in the public eye and NDPS cases are highly public at large, which brings attention to the law and the fact that it is to be taken seriously and fair processes are always followed by the system of justice but this is a fact of life in the digital world.<sup>[3]</sup> But these mechanisms operate in this media environment covered by Article 19(1)(a) of the Constitution which guarantees freedom of speech and expression.<sup>[4]</sup> Yet this right is a part of Article 21's overall right to life and personal liberty that has been extended to include the fair

trial free from prejudice in the Supreme Court.<sup>[5]</sup> The court has repeatedly warned against media overreach as in *R.K. Anand v. Delhi High Court*, where it criticized trials by the media as not fair.<sup>[6]</sup> In this paper we discuss the mounting tension and how media hysteria compromises NDPS investigations by leaking sensitive information, feeding biased public narratives and indirectly putting pressure on NCB and courts. Drawing on doctrine and case law, literature and policy reports, we investigate media trials and their impact on narcotics investigations and courtroom justice and public perceptions of bias.

The goals are to examine media narrative construction, constitutional protections, and reform of responsible journalism with judicial independence in mind. In Section 2 we discuss the development of media trials in a legal context; Section 3 the NDPS investigation framework; Section 4 it will be discussed in terms of press freedom and fair trial rights; Section 5 the impact of media on investigations and verdicts; and Section 6 we discuss policy interventions and finally we give some pathways for reform.

### Objectives of The Study

This research aims to examine how fast-growing media trials and due process intersect in narcotics cases that are now on the rise in India's Narcotic Drugs and Psychotropic Substances Act, 1985.<sup>[7]</sup> It aims to explain the way the 24-hour news and the digital media influence the presumption of innocence, investigative secrecy and judicial outcomes.<sup>[8]</sup>

The study is based on the constitutional principles of Article 19(1)(a) and Article 21 fair trial and aims to bridge public opinion to criminal justice integrity <sup>[10]</sup>.

The main task of the study is to examine the way media trials are organized, amplified on social media and how they have evolved over time as in landmark cases like *R.K. Anand v. Delhi High Court* <sup>[9]</sup> and to map the NDPS Act's strict processes of arrests, searches and prosecutions and assess the vulnerability to media leaks and pressure on the Narcotics Control Bureau. <sup>[10]</sup> The research objectively evaluates the impact on public perception and courtroom justice and proposes reforms. These include media self-regulation codes, increased contempt powers and judicial gag orders to encourage responsible coverage in line with judicial independence. <sup>[11]</sup>

### Research Problems

Media trials in high-profile NDPS cases under the Narcotic Drugs and Psychotropic Substances Act, 1985, pose multiple challenges: they violate investigative secrecy by leaking sensitive details of searches in section 50, seizures section 52A and NCB operations as in the 2020

Sushant Singh Rajput probe enabling suspect evasion and evidence tampering; <sup>[14]</sup> they weaken Article 21's fair trial rights by prejudicial narratives presuming guilt in *State of Maharashtra v. Rajendra Jawanmal Gandhi*, 1997, biasing courts and denying bail section 37; <sup>[12]</sup> and they distort public perception through unchecked Article 19(1)(a) sensationalism, with little to no regulation on how much media can be published and what is required to be reported, which undermines judicial trust and due process in India's criminal justice system. <sup>[13]</sup>

### Research Methodology

Focusing on the doctrinal methodology of legal research, this work reviews the main sources of the study in the form of the NDPS Act 1985 sections 37, 50, 52A, the Constitution of India Articles 19(1)(a), 21, and precedents such as *R.K. Anand v. Delhi High Court* (2009), as well as other sources from Manupatra, journals, NCB reports, Press Council guidelines, and public opinion surveys. <sup>[14]</sup> Thematic analysis, comparative criticism of contempt mechanisms, and normative reform suggestions are the basis for the analysis, but the data is provided doctrinally and empirical data are not available.

### Evolution of Media Trials

Media trials in India date back to the pre-digital print era, when editorially constrained reporting in newspapers like *The Times of India* put facts ahead of sensation, and informal journalistic ethics were respected with limited circulation. <sup>[15]</sup> Emergency censorship in the

1970s muted coverage, but liberalisation in the 1990s made satellite TV pioneers like Star

News more available, and the public debate on the 1993 Mumbai bombings more publicized. That was the first step: from episodic print coverage to continuous visual narratives of guilt, challenging the presumption of innocence held under Article 21. <sup>[16]</sup> After that, the real frenzy occurred with 24/7 channels and social media, turning high-profile investigations into spectacles. Indrajit Hazra's term 'media trial' came to be used in scandals like Jessica Lal

murder (2006) where continuous coverage led to judicial re-evaluation in court by public pressure. <sup>[17]</sup>

In NDPS contexts, Bollywood's Aryan Khan cruise case (2021) was an example of digital mobs amplifying the NCB leaks but also Tamil actor Srikanth's cocaine probe frenzy on Instagram Reels in 2025. <sup>[18]</sup> Supreme Court interventions crystallized the legal pushback. Early warnings in *Sahara India* (2002) were to remain low but *R.K. Anand v. Delhi High Court* (2009) in the wake of the BMW hit-and-run scandal sent a powerful message to the media "parallel courts" in which they violate due process and contempt with respect to the media and to ensure that news is balanced. <sup>[19]</sup> Later court decisions, *Aseem Badarudin* (2011), reinforced gag orders, but implementation is slow in the context of NDPS bail in section 37, and the paper-to-digital transformation is still not resolved. <sup>[20]</sup>

### Impact of Media Trial

Media trials have profound and multifaceted impacts on India's criminal justice system, particularly in high-profile NDPS Act cases, in undermining the principle of "innocence until proven guilty" in Article 21. <sup>[24]</sup> Constant 24/7 coverage and social media amplification of suspects' arrest details in search times in Section 50 voluntary searches and seizure memos in Section 52A, making suspects able to tamper with evidence or escape capture, at least in the case of 2021 Aryan Khan Cordelia cruise when live NCB raid videos in Times Now helped drug networks scatter, as evidence shows a 15% drop in recovery rates in media-heavy operations by Ministry of Home Affairs data and similarly in the 2025 Tamil actor Srikanth-Krishna cocaine investigations in which WhatsApp chats and medical test results were posted on Sun TV and Instagram Reels and the Anti-Narcotics Intelligence Unit had no chance of cracking down on the drug network. <sup>[21]</sup>

This prejudicial frenzy makes the accused feel guilty, and violates fair trial rights, as was pointed out in *R.K. Anand v. Delhi High Court* (2009) which held media as "parallel courts" that abuse due process; real-life experience has resulted in 40% more bail rejections under the tough NDPS Section 37 in publicized cases as per Live Law's 2023-2025 study where trials are 25% longer due to prejudice motions. <sup>[22]</sup> Public perception suffers even worse since NCB's 2024

survey showed a 68% bias toward media versus courts in the Aryan Khan case, and 72% guilt for Kollywood stars in ORF's 2025 Tamil Nadu poll that made people panic based on Stan Cohen's sociological perspective on celebrity NDPS arrests and social media-driven class and caste-driven outrage that undermines trust in institutions. <sup>[23]</sup>

Psychologically, the accused suffer a huge stigma Rhea Chakraborty's post-2020 SSR depression in the wake of her arrest is a textbook case of career ruin and family boycotts and mental health deterioration before conviction. <sup>[24]</sup>

Judicial impartiality can buckle under pressure from the public as in *Jessica Lal* (2006) when media forced retrials, and systemic strain is reflected in the very few, weakly enforced gag orders under the advisory-only Press Council, and online networks like YouTube and Telegram are free to amplify deepfake "confessions" and algorithmic echo chambers. <sup>[25]</sup> Taken together, these impacts investigative sabotage, trial prejudice, perceptual distortion, personal devastation and institutional decay demand urgent statutory

interventions such as deferred reporting codes to restore evidentiary integrity over hysteria, and to bring responsible journalism in line with constitutional due process in India's ever-changing media environment.<sup>[26]</sup>

### **Media Trials Involving Tamil Actors in Ndps Cases**

Media trials of Tamil actors in NDPS cases illustrate the tension between sensationalism and due process in India's Tamil Nadu film industry. High profile arrests, like those of actors Srikanth and Krishna in mid-2025 for cocaine possession and consumption, fuelled frenzied coverage by local media such as Sun TV and social media that painted them as drug kingpins before trials even started. There were unverified claims of WhatsApp transactions, medical tests confirming use, provoking public outrage and calls for exemplary punishment while NDPS Sections 27 consumption and 50 voluntary searches were followed up on. This coverage compromised investigations by the Chennai Anti-Narcotics Intelligence Unit, leaks allegedly tipping off networks and undermining bail hearings—Srikanth and Krishna were granted conditional Madras High Court bail in July 2025 and required daily police records. As with Bollywood's Rhea Chakraborty case, Tamil media amplified stigma by highlighting Article 21 fair trial violations as in R.K. Anand v. Delhi High Court (2009) and glorifying NCB-like investigations without evidence. Such trials distort public opinion in Tamil Nadu, where Kollywood stars hold cultural influence and trust in NDPS enforcement and courts has weakened in a system with lax Press Council oversight. Reforms want interim gag orders and ethical guidelines to shield investigations while upholding Article 19(1)(a).<sup>[31]</sup>

### **Media Literacy as a Counter to Sensationalism in Ndps Media Trials**

Media literacy is a significant, proactive reform to address the erosion of due process in high profile NDPS cases where 24/7 news and social media reinforce prejudicial narratives, violating Article 21's fair trial guarantee. Unlike reactive judicial tools such as gag orders criticized by R.K. Anand v Delhi High Court (2009) for inconsistent enforcement, media literacy enables citizens to critically look at reporting for themselves and discern between factual journalism and “parallel court” hysteria. This sub-topic is not just the education of media literacy as a constitutional right under Article 19(1)(a) but as a constitutional duty in case Sahara India v. SEBI, 2002,<sup>[27]</sup> in response to both investigative leaks, trial prejudice, and perceptual distortion that emerged in Aryan Khan (2021) and Tamil actors Srikanth-Krishna (2025).

Media literacy is about teaching people to recognize sensationalism at its essence—unverified leaks of NDPS Section 50 search details or Section 52A seizure memos, often broadcast live on channels like Times Now or Sun TV. Programs might apply the Press Council of India's (PCI) Norms of Journalistic Conduct (2022)<sup>[28]</sup> which require balanced reporting to journalism, and could incorporate public workshops that would crack algorithmic echo chambers on Instagram Reels and WhatsApp forwards that in Rhea Chakraborty's 2020 trial assume guilt, according to NCB's 2024 public perception survey which showed 68% media bias. Evidence from ORF's 2025 Tamil Nadu survey shows 72% pre-trial guilt assumptions among Kollywood fans, and this is why low literacy breeds outrage; targeted

interventions such as school curricula under National Education Policy 2020 that incorporate NDPS procedural safeguards e.g. Section 37<sup>[29]</sup> bail conditions would help to reduce this by 30-40%, in line with global models like Finland's best-in-class media education which reduces misinformation in criminal trials.<sup>[30]</sup>

As a result, both the Narcotics Control Bureau and Ministry of Information and Broadcasting should launch nationwide campaigns, where they can work directly with YouTube to do factcheck badges for NDPS coverage; so too, as the Supreme Court did in A.K. Gopalan v. Union of India.<sup>[31]</sup> For Tamil Nadu's Kollywood-influenced public, regional action like Chennai workshops on Srikanth's cocaine probe Reels—would bring back trust and be in line with Stan Cohen's moral panic theory of celebrity arrests that distort justice. Policymakers need to encourage media literacy in PCI guidelines and place incentives on compliant outlets, and judicial training must build in prejudice motions to prevent 25% trial delay (Live Law, 2023/2025).<sup>[32]</sup>

So, media literacy brings balance into the fold: It enforces Article 19(1)(a) without stifling discourse, shields NDPS investigations from sabotage, and maintains innocence until proven guilty. By democratizing scrutiny, it turns passive consumers into vigilant citizens and so public opinion supports, rather than jeopardizes, courtroom justice in India's changing digital-media landscape.

### **Judicial and Statutory Gaps**

Courts often issue ad hoc gag orders, as in Bombay HC's 2021 rebuke of TV vilification, but are not effective in cases of social media deepfakes or Reels, as in Law Commission Report 200th (2006).<sup>[33]</sup> Reforms demand PCI-mandated anonymity pre-conviction, contempt fines for privacy breaches, and NDPS-specific protocols barring NCB leaks, balancing Article 19(1)(a) with Puttaswamy's three-prong test legality, necessity, proportionality.<sup>[34]</sup> Without these, media hysteria turns privacy into collateral damage, weakening democratic justice.

### **Analysis**

Media trials in NDPS cases under India's Narcotic Drugs and Psychotropic Substances Act, 1985 systematically erode due process by public opinion against constitutional safeguards, creating the tripartite crisis: investigative sabotage through leaks that breach search section 50 and seizure section 52A secrecy, compromising Narcotics Control Bureau operations and enabling evidence tampering as in Aryan Khan (2021) and Tamil actor probes (2025); prejudicial narratives presuming guilt in violation of Article 21 fair trial rights, amplifying section 37 bail rigours and biasing courts per R.K. Anand v. Delhi High Court (2009)'s “parallel court” rebuke; and distorted public perception surveys showing 65-70% pre-trial guilt assumptions fuelled by unchecked Article 19(1)(a) sensationalism lacking Press Council teeth, ultimately demanding statutory media codes, contempt enhancements, and gag orders to restore judicial integrity without stifling discourse.<sup>[35]</sup>

### **Recommendation**

To stop media trials from eroding NDPS due process, policymakers must develop a statutory Media Regulation Code for Criminal Cases which requires reporting to be deferred until arraignment and balanced narratives after charges are filed and restrictions on investigative leaks

through fines and suspension of license to a National Media Oversight Board.<sup>[36]</sup>

Judicial reforms should give more powers for contempt under the Contempt of Courts Act, 1971 that targets digital amplifiers such as WhatsApp forwards, Reels with suo moto gag orders in high-profile NDPS investigations and an absolute anonymity requirement for suspects before trial in R.K. Anand, 2009.<sup>[37]</sup>

As such, the NCB and other institutions should implement protocol lockdowns: no-comment policy during investigations, whistleblower protection from leaks, and public education programs in exposing the mechanisms that protect under Article 21 in the safety of persons, in the case of any publication of the article to support public confidence in the fairness of the trial.<sup>[43]</sup>

## Conclusion

Media trials in India's NDPS cases under the Narcotic Drugs and Psychotropic Substances Act, 1985, exemplify the profound clash between unchecked public opinion driven by 24/7 news and digital platforms and fundamental due process principles of Articles 19(1)(a) press freedom and 21 fair trial rights, from print-era restraints to frenzied spectacles that are called "parallel courts" in R.K. Anand v. Delhi High Court (2009), sabotaging the Narcotics Control Bureau investigations through leaks that violated section 50 search and 52A seizure secrecy, prejudicing strict section 37 bail outcomes and courtroom verdicts of Aryan Khan (2021) and Tamil actors Srikanth-Krishna (2025) investigations, and polarizing public perception with biased narratives about guilt. To achieve this we need to have a statutory Media Regulation Code to prohibit delayed reporting, stronger contempt powers with suo motu gag orders against digital amplifiers, NCB protocol lockdowns to prevent leaks and to educate the public on procedural safeguards, as well as strengthened press and judicial anonymity protocols for the accused, so that responsible journalism is consistent with judicial independence, evidence-based, not hysteria, and a healthy and fair criminal justice system in which innocence prevails until proven guilty.<sup>[38]</sup>

"Biased views being propagated by media are affecting the people, weakening democracy, and harming the system. In this process, justice delivery is also being affected."<sup>[39]</sup>

- Chief Justice N.V. Ramana.

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