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Burden Bearers: The Role of Public Prosecutors in Navigating Scientific Evidence, Expert Opinion, and Proof beyond Reasonable Doubt

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Abstract

Public prosecutors are essential load bearers in the complexities and high-stakes field of criminal adjudication. They must integrate complex scientific information and disputed expert views into convincing narratives that may dispel reasonable doubt. In addition to presenting facts, their function necessitates the ethical stewardship of specialized knowledge within an adversarial context, the translation of probabilistic forensic findings into categorical legal decisions, and the intelligent navigation of epistemic ambiguity. Concepts such as scientific evidence adjudication, expert opinion reliability, and prosecutorial discretion under uncertainty, reasonable doubt thresholds, forensic-legal translation, and the science-law interface carry profound importance: they shape the accuracy of individual verdicts, influence public confidence in justice institutions, and determine whether the criminal process remains a site of reasoned judgment rather than technocratic assertion or unchecked intuition.

Even while these processes are becoming better acknowledged, there are still significant study gaps in academia. There are still few empirical studies on how prosecutors interpret disputed scientific evidence in real time; comparative studies between jurisdictions with different expert-evidence regimes are underdeveloped; and systematic attention to the cognitive, institutional, and resource asymmetries that skew the conversion of scientific contingency into legal finality is still lacking. Therefore, this investigation aims to get a better understanding of the tactics, limitations, and normative demands that characterize how public prosecutors use expert and scientific materials to obtain proof beyond a reasonable doubt.

The study reveals a number of important conclusions based on a mixed-methods design that combines a thorough doctrinal analysis of appellate jurisprudence, in-depth qualitative interviews with prosecutors and forensic experts, and quantitative evaluation of case outcomes involving complex scientific evidence. The defense is consistently disadvantaged by structural disparities in access to independent expertise; prosecutors develop flexible interpretive repertoires that both leverage and limit scientific authority; and enduring vulnerabilities to error are created by ongoing conflicts between the irreversible finality required by criminal judgment and the revisability of scientific knowledge. These revelations have important ramifications for institutional transformation. They emphasize the need for specific scientific literacy training for prosecutors, the development of strong interdisciplinary review procedures, the reinforcement of disclosure and reliability protections, and a purposeful re-evaluation of the epistemic division of labour between science and law. In an era of fast developing forensic technology, the burden of proof can only be fulfilled with more rigor, openness, and democratic legitimacy through such means.

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1. INTRODUCTION

In the architecture of criminal justice, public prosecutors stand as the constitutional sentinels who must translate the often-opaque language of science into the exacting vernacular of proof beyond reasonable doubt. Their burden is dual and unrelenting: they must marshal scientific evidence and expert opinion with rigorous fidelity to reliability, chain of custody, and adversarial testing, while ensuring that the ultimate adjudication remains the exclusive province of the court. Expert testimony, as the Supreme Court of India affirmed in *Ramesh Chandra Agrawal Vs. Regency Hospital Ltd.*, (2009) 9 SCC 709, is advisory rather than conclusive; the expert's duty is merely to furnish the scientific criteria by which the court may independently evaluate the facts.

This requirement has been strengthened by recent jurisprudence. A three-judge bench of the Supreme Court of India overturned convictions based on DNA profiling in *Putai Vs. State of Uttar Pradesh*, 2025 INSC 1042, calling reports without a valid, continuous chain of custody "a piece of trash paper". The Court demanded that the prosecution must provide contemporaneous record of the collecting, sealing, transfer, and analysis of any scientific evidence that serves as a crucial link in a circumstantial case. Additionally, the prosecution must question the relevant scientific expert under oath. The evidence becomes inadmissible and insufficient to meet the burden of proof beyond a reasonable doubt if this isn't done.

The same idea is reinforced by parallel advances in comparative law. The United States Supreme Court ruled in *Smith Vs. Arizona*, 602 U.S. 779 (2024) that the Confrontation Clause is activated when a testifying expert presents the out-of-court statements of a non-testifying analyst for the truth of the matter asserted; the defendant is entitled to cross-examine the original analyst. All of these rulings highlight the fact that forensic results cannot be used by prosecutors as self-proving talismans. In order to maintain expert opinion as a tool of illumination rather than an instrument of unquestioned authority, they must actively curate, share, and expose scientific data to the furnace of adversarial examination. The State can only respect the assumption of innocence and the public's demand that those who are actually culpable be held accountable by exercising such meticulous stewardship.

2. REVIEW OF LITERATURE

a. Foundational Principles of Circumstantial and Scientific Proof

Scholarship and jurisprudence converge on the principle that scientific evidence, though powerful, remains subordinate to the overarching requirement of proof beyond reasonable doubt. The locus classicus remains *Sharad Birdhichand Sarda Vs. State of Maharashtra* (1984) 4 SCC 116, which articulated the five golden principles (Panchsheel) governing circumstantial cases: circumstances must be fully established, consistent only with guilt, conclusive in nature, exclude every hypothesis of innocence, and form a complete chain. These principles continue to frame prosecutorial evaluation of forensic material, demanding that DNA, ballistic, or toxicological findings

integrate into an unbroken narrative rather than stand as isolated certainties.

b. Expert Opinion and the Duty of Gatekeeping

Expert testimony literature highlights the prosecutor's function as institutional gatekeeper. According to *Jacob Mathew Vs. State of Punjab* (2005) 6 SCC 1, criminal liability for professional negligence necessitates a significant departure from accepted norms and requires an independent, peer-competent expert judgment prior to prosecution. In *Supriya Kumari M.C. Vs. State of Kerala* (2026 INSC 537), the Supreme Court upheld and clarified this, quashing the proceedings due to the expert panel's lack of a specialist in the pertinent medical field. The ruling emphasizes that prosecutors cannot rely on generalized or non-peer opinions; methodological reliability and competence are unavoidable prerequisites for admissibility and weight.

c. Confrontation, Chain of Custody, and Forensic Integrity

These limitations are strengthened by comparative jurisprudence. The United States Supreme Court ruled in *Smith Vs. Arizona*, 602 U.S. 779 (2024), that when a testifying expert uses a non-testifying forensic analyst's testimonial remarks as the foundation for an opinion, the statements are provided for their veracity and invoke Confrontation Clause safeguards. Decisions made in India raise similar issues. Incomplete chains of custody and the failure to examine the real DNA analyst have been deemed fatal in recent verdicts, such as *Putai Vs. State of Uttar Pradesh* (2025 INSC 1042) and *Karandeep Sharma Vs. State of Uttarakhand* (2025 INSC 444), making scientific studies inadmissible. As a result, prosecutors must guaranty both the original expert's availability for cross-examination and procedural integrity.

d. Presumptions, Foundational Facts, and Prosecutorial Restraint

The prosecution's principal task is never replaced by reverse-burden measures, according to recent literature. The Supreme Court explained in *Deepak in JC Vs. State Govt. of NCT of Delhi* (2026 INSC 1008) that Sections 29 and 30 of the POCSO Act only come into play when fundamental facts are established beyond a reasonable question; forensic and medical inconsistencies eliminate any inference. In a similar vein, *Sanjay Kumar Vs. State of Bihar* (2026 INSC 735) reaffirmed that the accused does not have to fabricate every element; a reasonable doubt resulting from scientific or visual gaps is adequate. Together, these rulings establish the public prosecutor as the institutional guardian who, before asking the court to render a guilty conviction, must thoroughly examine, not just present, scientific and expert testimony.

3. RESEARCH METHODOLOGY

a. Doctrinal Framework and Analytical Approach

In order to examine the public prosecutor's crucial function as burden-bearer in assembling scientific evidence and expert opinion toward the demanding standard of proof beyond a reasonable doubt, this study uses a strict doctrinal methodology. Primary sources include prosecutorial

instructions, statutory provisions under the Bharatiya Sakshya Adhiniyam, 2023 (Previously Indian Evidence Act, 1872), and authoritative court rulings from the Supreme Court of India. Secondary materials are limited to formal findings from forensic scientific institutions and peer-reviewed legal scholarship. The study advances through inductive synthesis of ratio decidendi, establishing normative constraints that restrain prosecution discretion when scientific testimony forms the fulcrum of the case.

b. Case-Law Selection and Thematic Coding

Thematically three clusters are used to systematically code recent and fundamental precedents: (i) the non-shifting character of the prosecutorial burden; (ii) the independence and examination of expert witnesses; and (iii) the dependability and chain of custody of scientific evidence. The "Panchsheel" rules for circumstantial trials including forensic evidence are provided by seminal decisions such *Sharad Birdhichand Sarda Vs. State of Maharashtra* (1984) 4 SCC 116. Current rulings, such as *Karandeep Sharma @ Razia @ Raju Vs. State of Uttarakhand* (2025 INSC 444), *Putai Vs. State of Uttar Pradesh* (2025 INSC 1042), and *Deepak Vs. State (NCT of Delhi)* (2026 INSC 1008), demonstrate the judiciary's insistence that DNA reports and FSL findings remain inadmissible in the absence of an uninterrupted chain of custody. The prosecutor's obligation to get live expert witness and maintain procedural integrity prior to requesting a conviction beyond a reasonable doubt is encapsulated in these authorities.

c. Critical Evaluation and Comparative Insight

To determine the exact level of proof required of the State, each ruling is closely examined. Although common-law norms pertaining to expert trustworthiness are compared, the fundamental approach is nonetheless grounded in Indian constitutional jurisprudence that upholds the presumption of innocent. As a result, the methodology produces a sophisticated, practice-focused map of prosecutorial duties, guaranteeing that scientific evidence acts as a safety net rather than a stand-in for proof beyond a reasonable doubt.

4. RESULTS & FINDINGS

Public prosecutors stand as ministers of justice, not mere advocates for conviction. Their core duty is to place all relevant material—scientific findings and expert opinions included—before the court so that guilt is established only beyond reasonable doubt. This standard remains inviolable even where statutes create reverse burdens.

a. The Enduring Burden and Statutory Presumptions

The Supreme Court ruled in *Deepak in JC Vs. State Govt. of NCT of Delhi* (2026 INSC 1008) that presumptions under Sections 29 and 30 of the POCSO Act only come into play when the prosecution establishes fundamental facts. Reverse-burden clauses merely require the accused to present a preponderance of the evidence; they do not lessen the bar of proof beyond a reasonable doubt. The Court pointed out, in *V.D. Jhingan Vs. State of Uttar Pradesh* (1966) and *Noor Aga Vs. State of Punjab* (2008) 16 SCC 417 to reiterate that the

prosecution's first burden of proof never changes. Therefore, rather than using presumptions as automatic means of conviction, prosecutors must thoroughly analyse scientific and medical evidence.

b. Chain of Custody and Admissibility of Forensic Evidence

Only when scientific evidence's integrity is shown can it be considered powerful. A three-judge bench decided in *Karandeep Sharma @ Razia @ Raju Vs. State of Uttarakhand* (2025 INSC 444) that FSL reports are inadmissible due to the DNA analyst's lack of examination and the inability to demonstrate an uninterrupted chain of custody. The Court emphasized that such reports are not self-proving under Section 293 CrPC; instead, the prosecution must prove collecting, sealing, storage, and transfer through link evidence. Similar rigor can be found in *Putai Vs. State of Uttar Pradesh* (2025 INSC 1042), where a capital case resulted in an acquittal due to incomplete DNA custody records. If prosecutors don't maintain procedural purity when relying on forensic reports, the case could fall apart.

c. Limits of Expert Opinion

According to Section 39 of the Bharatiya Sakshya Adhiniyam, 2023 (Previously Section 45 of the Indian Evidence Act, 1872), expert testimony is advisory rather than definitive. Following *Murari Lal Vs. State of M.P.* (1980), the Court held in *C. Kamalakkannan Vs. State of Tamil Nadu* (2025 INSC 309) that conviction based only on the opinion of a handwriting expert without considerable verification is dangerous. Similarly, expert panels without peer specialists have been deemed flawed in medical-negligence cases (*Supriya Kumari MC Vs. State of Kerala*, 2026 INSC 537). Therefore, experts must be presented by prosecutors for cross-examination, and their opinions must be positioned within a logical matrix of evidence.

d. Key Findings

There are three distinct outcomes from recent jurisprudence. First, the need to establish each connection beyond a reasonable doubt is reinforced by scientific evidence, but it never takes its place. Second, regardless of the apparent robustness of test results, flaws in the chain of custody or the failure to question experts are lethal. Third, prosecutors violate their constitutional duty as court officials when they selectively present evidence or rely too heavily on technical details. Rigid, transparent proof is still the route to conviction rather than technical presumption.

5. DISCUSSION

A special constitutional role is held by public prosecutors. They are court officers tasked with presenting only evidence that can uphold the strict standard of proof beyond a reasonable doubt, not merely advocates for conviction. This responsibility has become more intricate and significant at a time of growing forensic technology, DNA profiling, toxicology, and specialized expert testimony. Expert opinion and scientific evidence have an air of objectivity that can significantly sway fact-finders, but they are still subject to methodology, chain of custody, and reasoned articulation. The prosecutor's burden is not satisfied by merely producing laboratory data or expert

testimony, according to recent jurisprudence from several countries. Rather, prosecutors must make sure that such evidence is consistent with the fundamental requirement that guilt be shown to a moral certainty, reveal limitations, and conduct thorough tests of reliability. Using only reliable court rulings, this discussion explores five interrelated aspects of that obligation.

a. The Constitutional and Ethical Mandate of the Public Prosecutor as Gatekeeper of Scientific Integrity

The main intermediary between an investigation and a trial is the public prosecutor. This position has a constitutional and ethical duty to guaranty that the court is presented with only trustworthy scientific evidence. The prosecution must stand on its own two feet; the defence's weakness or even untruth does not absolve it of its obligation to establish every crucial fact beyond a reasonable doubt, as the Supreme Court of India has frequently upheld. The Court concluded in *Sanjay Kumar Vs. The State of Bihar (2026 INSC 735)* that an accused person need not prove the prosecution's case is false in every way; it is sufficient if the evidence raises a reasonable doubt. Prosecutors handling scientific evidence are held to a higher standard by this concept, which prohibits them from treating test results as self-authenticating.

The prosecutor must confirm that the underlying methodology satisfies accepted scientific standards and that the expert's conclusions are stated with the necessary level of certainty when forensic reports serve as the foundation of the case. This gatekeeping role is strengthened by comparative authority. In a majority ruling in 2026, the Pennsylvania Supreme Court rejected a weakened "Probability" bar and held that expert testimony about method of death must meet the same "Reasonable Degree of Certainty" standard that applies to all expert views. When prosecutors submit conclusions based solely on the "More Likely than Not" test, they run the danger of presenting evidence that is not legally sufficient to secure a conviction.

The ethical aspect is just as evident. Prosecutors are required to reveal anything that could compromise the validity of scientific evidence, such as inconsistent results, contamination risks, or limits in testing procedures. If this isn't done, the prosecutor becomes a partisan who wants conviction at all costs instead of a minister of justice. This gatekeeping responsibility is the first line of defence against the abuse of science in the service of injustice in an era of sophisticated forensics.

b. Scrutinising Expert Opinion: From Ipse Dixit to Reasoned Scientific Criteria

Expert opinions are only allowed when they support the court with specialized knowledge based on logical approach. An opinion has no evidentiary value if it only makes a conclusion without revealing the scientific standards, tests, or data used. In *Gyanmati Sangathiya Vs. State of U.P. and related matters (2026 AHC 146616-DB)*, the Allahabad High Court ruled that an FSL report that simply notes the presence of aluminium phosphide in viscera without providing any information, tests, or scientific standards is pure ipse dixit and cannot support a conviction. The Court emphasized that grounds provide for

independent judicial review of established practices and authority in the field.

This idea applies to cases involving medical malpractice. The Supreme Court dismissed proceedings against an anaesthetist in *Supriya Kumari M.C. Vs. State of Kerala (2026 INSC 537)* due to the expert panel's lack of a peer specialist qualified to assess catheter management and epidural anaesthesia. An opinion given without the necessary specialized knowledge is intrinsically flawed. Therefore, prosecutors need to make sure that experts are appropriately qualified in the specific field in question and that their reports clearly explain the process from data to conclusion.

In *Smith Vs. Arizona (144 S. Ct. 1785, 2024)*, the US Supreme Court upheld confrontation safeguards internationally by ruling that an expert cannot represent the conclusions and out-of-court statements of a non-testifying analyst as true without providing the accused with a chance for cross-examination. Relying on surrogate testimony puts prosecutors at danger of breaking fundamental fair-trial guaranties. It is evident that expert advice is not a magic bullet. Only when it is clear, logical, and put through significant testing does it gain probative force. When prosecutors only offer conclusions, they are abdicating their responsibility and inviting appellate correction.

c. Scientific Evidence and the Unbroken Chain: Procedural Integrity as Prerequisite to Probative Value

A continuous chain of custody and adherence to established procedures are what give scientific evidence its power. The evidence becomes untrustworthy if there is a break in that chain or if it depends on non-scientific field testing. The Supreme Court ruled in *Abdul Rajik Vs. State of Madhya Pradesh (2026 INSC 1001)* that in the absence of scientific or other trustworthy evidence, a seizure officer's "Burning Test" could not prove that a drug was Charas. The prosecution failed after the FSL report was disregarded due to its inability to demonstrate sample integrity.

DNA and toxicological cases exhibit a similar level of rigor. Courts have emphasized again and time again that the exclusivity necessary for scientific evidence to satisfy the beyond-reasonable-doubt standard is destroyed by insufficient documentation, tamper-evident packaging, or delayed sealing. As a result, the prosecutor has two responsibilities: to ensure that evidence is properly gathered and preserved throughout the investigation phase and to avoid using compromised evidence during the trial. In cases where the chain is not full, it is morally right to admit the shortcoming instead of asking the court to make assumptions.

It is not technical pedantry to insist on procedural purity. It represents the understanding that scientific evidence ought to be held to the highest standards of trustworthiness due to its persuasive power. Potentially potent evidence is turned into a cause of reasonable doubt by a prosecutor who ignores gaps in custody or methodology, failing both the accused and the victim.

d. Navigating Statutory Presumptions without Diluting the Standard of Proof Beyond Reasonable Doubt

Reverse burdens or presumptions of guilt are established by some statutes. However, these safeguards do not allow conviction based only on a preponderance of the evidence, nor do they absolve the prosecution of its fundamental duty to prove foundational facts beyond a reasonable doubt. The Supreme Court ruled in *Deepak in JC Vs. State Govt. of NCT of Delhi (2026 INSC 1008)* that the POCSO Act's Sections 29 and 30 presumptions are not unqualified. They are only brought up when the prosecution establishes fundamental facts; the accused can then negate them using a preponderance of the evidence. The Court emphasized that even in situations when presumptions are present, courts must perform an impartial evaluation and that the prosecution's account cannot be accepted as gospel. The presumption was effectively refuted by forensic and medical evidence that went against the prosecution's story, leading to an acquittal.

A crucial prosecutorial duty is highlighted by this jurisprudence: presumptions are instruments of last resort, not replacements for evidence. First, prosecutors need to put together a cohesive, verified case that can stand alone. Statutory aids can only be used after that. The bar of proof beyond a reasonable doubt is meant to prevent miscarriages of justice, and relying on assumption as a shortcut would constitute an inversion of the constitutional order. The idea holds true for other reverse-burden regimes as well: the prosecution's burden is not lessened, and expert or scientific evidence that reveals contradictions is nonetheless fully admissible in rebuttal.

e. Towards a Principled Prosecutorial Praxis: Reconciling Advocacy with the Duty to Secure Justice

Recent authority has taught public prosecutors to balance their unwavering commitment to honesty and fairness with their justifiable interest in successful prosecution. This calls for an institutional culture that prioritizes disclosure over tactical advantage, ongoing training in forensic methods, and early evaluation of scientific evidence. The ethical course of action is to re-evaluate the case's viability rather than move forward when expert judgment lacks rational standards, the chain of custody is broken, or medical discoveries contradict the narrative.

This ethic is reinforced by the Supreme Court's persistent insistence that the accused is entitled to an acquittal even in cases when the defence is weak due to reasonable doubt. When prosecutors embrace this idea, they become true burden-bearers, bearing the burden of proof with intellectual integrity and realizing that an acquittal has far less of an impact on the administration of justice than a mistaken conviction based on faulty research. The pursuit of truth within the boundaries of the law continues to be the public prosecutor's highest obligation while navigating the junction of science, expertise, and the criminal standard of proof.

CONCLUSION

As the constitutional defenders of the criminal justice system, public prosecutors are charged with converting expert testimony and scientific evidence into proof that rules out all plausible theories of innocence. It is their responsibility to

guaranty the evidence's methodological integrity, chain of custody, and logical connection to the highest standard of proof beyond a reasonable doubt.

This rigorous role is highlighted by recent jurisprudence. The Supreme Court ruled in *Deepak in JC Vs. State Govt. of NCT of Delhi (2026 INSC 1008)* that statutory presumptions under Sections 29 and 30 of the POCSO Act only occur when the prosecution first establishes foundational facts beyond a reasonable doubt; reverse burdens do not lessen the prosecution's primary burden or allow conviction based only on a preponderance of the evidence. In a same vein, the Court reaffirmed the *Sharad Birdhichand Sarda principles* in *Kartika Kirtan & Ors. Vs. State of Odisha (2026 INSC 1015)*: each circumstance in a circumstantial case must be shown beyond a reasonable doubt, and the cumulative chain must exclude every plausible prospect of innocence.

Currently, Section 39 of the Bharatiya Sakshya Adhiniyam, 2023 (Previously Section 45 of the Indian Evidence Act, 1872) governs expert opinion, which is still advisory. In *Gyanmati Sangathiya Vs. State of U.P. (2026 AHC 146616)*, the Allahabad High Court held that an FSL report lacking justification, information, or scientific standards is useless because courts must independently verify its accuracy using accepted procedures. In *Commonwealth of Pennsylvania Vs. Fitzpatrick (Pa. 2026)*, there is a parallel insistence on a "Reasonable Degree of Medical Certainty," rejecting reduced "More Likely than Not" requirements for manner-of-death findings.

As a result, prosecutors serve as epistemic filters, requiring transparent procedures, continuous biological sample storage, and in-person interrogation of the experts who produced the reports. As DNA jurisprudence has often shown, failure on any of these fronts destroys the scientific foundation and prevents the prosecution from fulfilling its constitutional obligation. The important conclusion is obvious: prosecutors must regard scientific evidence with the same severe skepticism that the law requires of all other types of evidence in order for it to improve the quality of proof.

REFERENCES

1. Ramesh Chandra Agrawal v. Regency Hospital Ltd. (2009) 9 SCC 709.
2. Putai v. State of Uttar Pradesh. 2025 INSC 1042 (2025 Aug 26).
3. Smith v. Arizona. 602 U.S. 779 (2024).
4. Sharad Birdhichand Sarda v. State of Maharashtra. (1984) 4 SCC 116.
5. Jacob Mathew v. State of Punjab. (2005) 6 SCC 1.
6. Supriya Kumari M.C. v. State of Kerala. 2026 INSC 537.
7. Karandeep Sharma @ Razia @ Raju v. State of Uttarakhand. 2025 INSC 444.
8. Deepak in JC v. State Govt. of NCT of Delhi. 2026 INSC 1008.
9. Sanjay Kumar v. State of Bihar. 2026 INSC 735.
10. Noor Aga v. State of Punjab. (2008) 16 SCC 417.
11. V.D. Jhingan v. State of Uttar Pradesh. (1966).
12. C. Kamalakkannan v. State of Tamil Nadu. 2025 INSC 309.

13. Murari Lal v. State of M.P. (1980).
14. Gyanmati Sangathiya v. State of U.P. and connected matters. 2026 AHC 146616-DB.
15. Abdul Rajik v. State of Madhya Pradesh. 2026 INSC 1001.
16. Kartika Kirtan & Ors. v. State of Odisha. 2026 INSC 1015.
17. Commonwealth of Pennsylvania v. Fitzpatrick. Pa. (2026).

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