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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provide dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

# **MEDIA TRIALS AND JUDICIAL INTEGRITY: A STUDY OF CONTEMPT OF COURT AND RIGHT TO A FAIR TRIAL IN INDIA**

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## **ABSTRACT**

The crossroad of media freedom and the integrity of the judiciary is becoming a critical fissure in India's democratic edifice. Questions on the effects of courtroom reporting on judicial independence and the constitutional guarantee of fair trial have also been raised as a result of media trials, featuring wide and sometimes biased coverage of sub judice matters. A free press (under Art 19(1)(a) of the Indian Constitution) is the life blood of democracy; but exercising it happens to be controversial when it impinges upon the neutral and unbiased administration of justice. The judiciary has, at times, described media trials as a "parallel judicial process" that risks undermining public confidence in courts. This paper critically examines the relationship between media trials, contempt of court jurisprudence, and the right to a fair trial under Article 21. It explores statutory provisions such as the Contempt of Courts Act, 1971, and judicial pronouncements including *Sahara India Real Estate Corp. v. SEBI* and *State of Maharashtra v. Rajendra Jawanmal Gandhi*. The analysis also draws upon comparative perspectives from jurisdictions like the United Kingdom and the United States to highlight how democracies balance press freedom with judicial independence. The paper concludes by suggesting regulatory and self-regulatory mechanisms for media, while emphasizing the need for judicial restraint and nuanced guidelines to safeguard both constitutional values.

**Keywords:** Media Trials, Judicial Integrity, Fair Trial

## **INTRODUCTION**

In today's democratic space, media is commonly referred to as the "fourth pillar" of governance as it informs citizens, influences public opinion and holds powerful institutions to account. The Press in India has traditionally been an important mediator of transparency and democratic involvement. But the growing trend of "media trials," in which media companies decide before court verdicts what the verdicts will be and therefore what public opinion should be, has put some strain on the Constitution's guarantees of fair trials.<sup>1</sup>

The right to freedom of speech and expression, enshrined under Article 19(1)(a), grants the press significant autonomy to report on matters of public interest.<sup>2</sup> Yet, this right is not absolute and is subject to reasonable restrictions under Article 19(2), which include contempt of court.<sup>3</sup> Media trials directly engage this exception, as prejudicial reporting can obstruct the course of justice or erode public faith in the judiciary.

Article 21 of the Constitution also provides every person the right to life and personal liberty, a right that has been construed by the Supreme Court to encompass the right to a fair trial.<sup>4</sup> On the one hand, this leaves the judiciary grappling with the difficult task of reconciling two important constitutional mandates: protecting press freedom and guaranteeing the integrity of the justice system, by providing a fair trial.

The goal of this research is threefold:

1. To examine the legal framework surrounding media trials in India, focusing on contempt of court.
2. To assess how media trials affect the right to a fair trial and the independence of the judiciary.
3. To propose reforms and regulations that can balance media freedom with judicial integrity.

This study adopts a doctrinal approach, relying on statutes, case law, and scholarly commentary, while also engaging with comparative perspectives. The scope of the paper is limited to the Indian context but briefly touches upon foreign jurisdictions to highlight potential lessons for reform.

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<sup>1</sup> Law Commission of India, *Report on Trial by Media: Free Speech vs Fair Trial under Criminal Procedure Code, 1973* (2006) p. 4

<sup>2</sup> *Indian Express Newspapers v. Union of India*, AIR 1986 SC 515.

<sup>3</sup> Constitution of India, Art. 19(2).

<sup>4</sup> *Maneka Gandhi v. Union of India*, AIR 1978 SC 597

## **CONCEPT OF MEDIA TRIALS IN INDIA**

The phrase “media trial” refers to situations where news media, through sustained coverage, takes on the role of an adjudicator by declaring individuals guilty or innocent before a court verdict.<sup>5</sup> While public debate is an essential feature of democracy, such pre-trial publicity often risks influencing judicial proceedings and eroding the presumption of innocence guaranteed under criminal jurisprudence.

In India, the phenomenon gained prominence in high-profile cases such as the Jessica Lal murder trial, the Aarushi Talwar double murder case, and more recently, the Sushant Singh Rajput death investigation. In these instances, media narratives shaped public opinion to such an extent that they arguably created a parallel trial outside the courtroom.

Historically, the media in India has played a constructive role in exposing injustices and corruption, thereby aiding accountability. However, the commercialisation of news and the advent of 24×7 electronic media have intensified sensationalism. The race for higher viewership ratings has encouraged dramatic reporting, leading to premature conclusions that may prejudice ongoing trials.

The judiciary has often recognized the dual role of the media: while it can facilitate transparency by bringing court proceedings to the public, it can also endanger justice by presenting partial facts. In *State of Maharashtra v. Rajendra Jawanmal Gandhi*, the Supreme Court warned that trial by media, press, or electronic media is the antithesis of the rule of law, as it usurps the functions of courts.<sup>6</sup>

Moreover, social media has further blurred the boundaries of responsible journalism. Platforms such as Twitter, YouTube, and Facebook amplify unverified information, thereby intensifying prejudicial narratives. Unlike traditional media, digital platforms remain less regulated, raising new challenges for judicial integrity.<sup>7</sup>

Thus, media trials represent a double-edged sword: they advance democratic participation but simultaneously threaten judicial impartiality and the constitutional promise of a fair trial. This

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<sup>5</sup> Law Commission of India, *Report on Trial by Media: Free Speech vs Fair Trial under Criminal Procedure Code, 1973* (2006) p. 6.

<sup>6</sup> *State of Maharashtra v. Rajendra Jawanmal Gandhi*, (1997) 8 SCC 386.

<sup>7</sup> Apar Gupta, “Social Media, Free Speech, and Fair Trial” (2019) 4 NUJS L Rev 15.

paradox makes it essential to analyze the role of contempt of court and judicial safeguards in balancing competing rights.

### **Judicial Integrity and the Role of Courts**

Judicial integrity signifies the independence, impartiality, and accountability of the judiciary in upholding the rule of law. It ensures that justice is administered fairly, free from external influences such as political pressure, economic interests, or media sensationalism. In a constitutional democracy like India, the judiciary's legitimacy rests on public trust, which is eroded when media narratives appear to dictate judicial outcomes.<sup>8</sup>

The principle of judicial independence is enshrined in the Constitution of India. Article 50 directs the State to separate the judiciary from the executive, while Articles 124–147 provide for an autonomous Supreme Court, and Articles 214–231 establish independent High Courts. This structural separation underscores the expectation that judicial decision-making should remain uninfluenced by societal pressures, including those exerted by media trials.

The role of courts in safeguarding judicial integrity becomes pronounced when prejudicial reporting threatens the administration of justice. In *P.C. Sen, In re*, the Supreme Court observed that speeches or publications which prejudice the trial of a case pending in court amount to contempt of court, since they interfere with the impartial dispensation of justice. Similarly, in *A.K. Gopalan v. Noordeen*, the Court reiterated that the judiciary must remain insulated from external narratives to maintain its credibility.

At the same time, the courts have acknowledged the constructive role of the media in promoting transparency. In *Reliance Petrochemicals Ltd. v. Proprietors of Indian Express Newspapers*<sup>9</sup>, the Supreme Court observed that a well-informed citizenry is crucial for democratic participation, and the press acts as an instrument of accountability. Thus, the judiciary does not seek to curtail the media's role entirely but rather to ensure that reporting does not cross the line into influencing pending proceedings.

The challenge, therefore, lies in striking a balance: while judicial integrity requires insulation from prejudicial publicity, it also thrives on the transparency enabled by responsible

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<sup>8</sup> Abhinav Chandrachud, "Democracy and Judicial Independence in India" (2015) 27 Nat'l L Sch India Rev 135.

<sup>9</sup> *Reliance Petrochemicals Ltd. v. Proprietors of Indian Express Newspapers*, AIR 1989 SC 190.

journalism. Courts, as guardians of constitutional rights, must actively mediate this tension by issuing guidelines, invoking contempt powers when necessary, and promoting judicial restraint to maintain public confidence.

## **Contempt of Court – Legal Framework and Case Law**

The doctrine of contempt of court is central to understanding how Indian law regulates media trials. Contempt jurisdiction empowers the judiciary to preserve its dignity, protect judicial integrity, and ensure the fair administration of justice.

### **A. Constitutional and Statutory Basis**

Article 129 of the Constitution declares the Supreme Court as a court of record with the power to punish for its contempt, while Article 215 provides the same authority to High Courts. This constitutional safeguard recognizes that the judiciary cannot function effectively if its authority is undermined by external influences, including prejudicial media reporting.

The **Contempt of Courts Act, 1971** provides the statutory framework. Section 2 defines contempt as either **civil** (wilful disobedience of court orders) or **criminal** (acts that scandalize or lower the authority of the court, prejudice judicial proceedings, or obstruct justice). Of particular relevance to media trials is Section 2(c)(ii), which covers publications that interfere with judicial proceedings.

At the same time, the Act incorporates safeguards. Section 5 protects fair criticism of judicial acts, while Section 13 stipulates that contempt shall not be punishable unless it substantially interferes with justice. These provisions recognize the need to balance judicial integrity with press freedom.

### **B. Judicial Approach in Key Cases**

In *E.M.S. Namboodiripad v. T.N. Nambiar*, the Supreme Court clarified that while free speech is a constitutional right, it must yield when it interferes with the administration of justice.<sup>10</sup> The Court held that allegations against judges which scandalize the judiciary amount to contempt. In *P.C. Sen, In re*, a radio broadcast by a Chief Minister commenting on a pending case was held contemptuous because it created a likelihood of prejudice in judicial decision-making. Similarly, in *A.K. Gopalan v. Noordeen*, prejudicial press reporting about a criminal case was found to interfere with the trial process. These early precedents established that freedom of the

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<sup>10</sup> *E.M.S. Namboodiripad v. T.N. Nambiar*, (1970) 2 SCC 325.

press cannot extend to prejudging sub judice matters.

The jurisprudence evolved further in *Sahara India Real Estate Corp. Ltd. v. SEBI*, where the Supreme Court dealt with prejudicial media coverage during a pending trial. The Court recognized that unrestricted reporting could affect the fairness of proceedings and introduced the doctrine of “**postponement orders**”, allowing courts to temporarily restrict publication of trial-related material to prevent prejudice. This judgment struck a balance by protecting both Article 19(1)(a) and Article 21 rights.

In *Arundhati Roy, In re*, the Court highlighted that contempt jurisdiction should not be invoked lightly but emphasized that personal attacks on judges or attempts to undermine judicial independence warrant strict action.<sup>9</sup> Similarly, in *Manu Sharma v. State (NCT of Delhi)*, relating to the Jessica Lal murder case, the Court observed that media trials can cause serious prejudice but stopped short of punishing the media, instead urging self-regulation.<sup>11</sup>

### **C. Criticism of Contempt Jurisprudence**

Despite its importance, contempt law in India has been criticized for vagueness and overbreadth. Scholars argue that the offence of “scandalizing the court” (Section 2(c)(i)) is subjective and risks being misused to shield the judiciary from legitimate criticism.<sup>12</sup> Moreover, excessive reliance on contempt powers may have a chilling effect on press freedom. Nevertheless, courts have gradually moved towards a doctrine of necessity, where contempt jurisdiction is invoked only when there is a real and substantial risk of interference with justice. This approach aligns with comparative jurisdictions, such as the United Kingdom, where the **Contempt of Court Act, 1981** restricts liability to instances of substantial risk of serious prejudice.<sup>12</sup>

Thus, while contempt powers remain an essential safeguard against prejudicial media trials, their exercise must be tempered with caution to avoid undermining democratic debate and accountability.

## **Right to Fair Trial under Article 21 and its Relationship with Article 19(1)(a)**

The right to a fair trial is a cornerstone of criminal justice and a fundamental aspect of the rule of law. Article 21 of the Constitution of India guarantees that no person shall be deprived of

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<sup>11</sup> *Manu Sharma v. State (NCT of Delhi)*, (2010) 6 SCC 1.

<sup>12</sup> Gautam Bhatia, *Offend, Shock, or Disturb: Free Speech under the Indian Constitution* (New Delhi: OUP, 2016) p. 241

life or personal liberty except according to the procedure established by law. Judicial interpretation has expanded this to include the right to a fair, just, and reasonable trial.

### **A. Fair Trial as a Constitutional Guarantee**

The Supreme Court in *Maneka Gandhi v. Union of India* held that the “procedure established by law” under Article 21 must be fair, just, and reasonable, thereby elevating fair trial to the status of a fundamental right. Later in *Zahira Habibullah Sheikh v. State of Gujarat* (Best Bakery case), the Court emphasized that denial of a fair trial constitutes a miscarriage of justice that undermines public confidence in the legal system.

Fair trial encompasses several elements: presumption of innocence, right to legal representation, impartial adjudication, and protection from undue influence.<sup>13</sup> When media narratives pre-judge guilt, they directly impinge upon these elements, undermining the presumption of innocence and exerting indirect pressure on judges.

### **B. Freedom of Press under Article 19(1)(a)**

Parallel to Article 21, Article 19(1)(a) guarantees freedom of speech and expression, which has been judicially recognized to include the freedom of the press. The media therefore enjoys constitutional protection to report on matters of public interest, including judicial proceedings. However, Article 19(2) permits reasonable restrictions in the interests of contempt of court, defamation, or public order.

In *Indian Express Newspapers v. Union of India*, the Court underscored the special significance of press freedom in democracy, calling it the “heart of social and political intercourse.” Yet, this freedom is not absolute; when exercised irresponsibly, it may obstruct justice.

### **C. Balancing Articles 19(1)(a) and 21**

The tension between press freedom and fair trial requires judicial balancing. In *Sahara India Real Estate Corp. v. SEBI*, the Supreme Court held that courts must adopt a case-by-case approach, permitting restrictions on reporting (through postponement orders) only when there is a “real and substantial risk” of prejudice to a fair trial. This doctrine harmonizes Articles 19 and 21 by recognizing that neither right is superior; both must coexist through reasonable restrictions.

Similarly, in *Naresh Shridhar Mirajkar v. State of Maharashtra*, the Court upheld in-camera

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<sup>13</sup> Law Commission of India, *184th Report on The Code of Criminal Procedure, 1973* (2003), p. 112.

proceedings when necessary to secure the administration of justice, even though this restricted press reporting.<sup>14</sup> This illustrates the judiciary's recognition that fair trial rights sometimes outweigh the media's right to report.

#### **D. Practical Challenges in Balancing Rights**

Despite judicial efforts, striking the balance remains complex. Prejudicial reporting can influence jurors, judges, and even witnesses. In India, though jury trials were abolished after *K.M. Nanavati v. State of Maharashtra*, judges themselves are not immune to societal pressures shaped by media narratives.<sup>15</sup> The rise of digital media further complicates enforcement, as prejudicial information circulates rapidly beyond the scope of traditional regulatory mechanisms.

Therefore, while constitutional jurisprudence emphasizes balancing Articles 19(1)(a) and 21, the effectiveness of this balance depends on robust regulatory guidelines, judicial restraint, and responsible media conduct.

#### **E. Balance Between Freedom of Press and Judicial Fairness**

The relationship between press freedom and judicial fairness is not a matter of one right prevailing over the other, but rather a constitutional balance where both coexist harmoniously. The judiciary has developed tools such as proportionality, postponement orders, and in-camera proceedings to mediate this tension.

The Indian judiciary follows a balanced approach to media trials by applying the **doctrine of proportionality**, ensuring restrictions on press freedom are narrow, necessary, and temporary. Through tools like **postponement orders** (*Sahara v. SEBI*) and **in-camera proceedings** (*Naresh Mirajkar*), courts protect fair trial rights without permanently curbing free expression. Compared globally, India lies between the UK's stricter liability rule and the US's strong press protections, adopting a **middle path** that seeks to harmonize Articles 19(1)(a) and 21. Yet, with the rise of instant digital media, judicial orders alone are insufficient, making responsible journalism and self-regulation crucial for preserving both free speech and judicial integrity.

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<sup>14</sup> *Naresh Shridhar Mirajkar v. State of Maharashtra*, AIR 1967 SC 1.

<sup>15</sup> *K.M. Nanavati v. State of Maharashtra*, AIR 1962 SC 605.

## **Key Case Studies in India**

### ***A. The Jessica Lal Murder Case (1999 – 2010)***

The murder of model Jessica Lal in 1999 became one of the most high-profile criminal cases in India, largely due to extensive media coverage. Initially, the trial court acquitted the accused, Manu Sharma, citing insufficient evidence.<sup>16</sup> Public outrage, amplified by relentless media reporting, placed enormous pressure on the judiciary. The case was retried, and in *Manu Sharma v. State (NCT of Delhi)*, the Supreme Court convicted Sharma and sentenced him to life imprisonment.

While the outcome aligned with public sentiment, the case raised significant concerns about whether the retrial was influenced more by public pressure than purely judicial reasoning. The Court, however, acknowledged the constructive role of the media in ensuring accountability, but simultaneously warned against the dangers of media trials becoming prejudicial. This case highlighted the paradox: the media acted as a catalyst for justice but also risked compromising judicial integrity.

### ***B. The Aarushi Talwar Double Murder Case (2008 – 2017)***

The 2008 double murder of teenager Aarushi Talwar and domestic servant Hemraj in Noida received sensationalized coverage. Media narratives oscillated between portraying Aarushi's parents as guilty masterminds and victims of a botched investigation.<sup>17</sup> Tabloid-style reporting, speculative theories, and leaked investigation details created a public frenzy.

The trial court convicted Aarushi's parents, Rajesh and Nupur Talwar, in 2013. However, in *Dr. Rajesh Talwar & Anr. v. CBI*, the Allahabad High Court acquitted them in 2017, citing lack of evidence and criticizing the trial court for drawing inferences influenced by conjectures and media speculation. The case exemplified how media-driven narratives can cloud judicial objectivity and create a hostile environment for the accused, violating the principle of presumption of innocence.

### ***C. The Sushant Singh Rajput Death Case (2020)***

The death of actor Sushant Singh Rajput in 2020 led to one of the most intense media trials in India's history. News channels ran continuous coverage, often speculating about causes of

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<sup>16</sup> *State v. Manu Sharma*, (2001) 92 DLT 692.

<sup>17</sup> Rashmi Sahni, "Trial by Media: Aarushi Talwar Case," *Economic & Political Weekly* Vol. 48, No. 6 (2013), p. 17.

death, drug use, and alleged conspiracies.<sup>18</sup> The reportage extended to vilifying individuals connected to the case, including actress Rhea Chakraborty, who faced a trial by media long before formal charges.

The Bombay High Court, in *Rhea Chakraborty v. State of Bihar*, criticized sections of the electronic media for irresponsible reporting and cautioned that such coverage could amount to contempt of court. It stressed that media freedom does not extend to interfering with ongoing investigations or prejudicing trial outcomes.

This case underscored the dangers of modern media ecosystems, where television and social media create an uncontrolled echo chamber of narratives. Unlike earlier cases, the judiciary explicitly warned media houses about contempt and emphasized the urgent need for self-regulation.

### **Challenges and the Need for Regulation**

#### **A. The Absence of a Clear Statutory Framework**

One of the major challenges in addressing prejudicial media trials in India is the absence of a comprehensive statutory framework. While the **Contempt of Courts Act, 1971** provides courts with powers to punish acts that scandalize or interfere with judicial proceedings, its application to media trials remains inconsistent. Courts often rely on ad hoc measures, such as issuing postponement orders or guidelines, but there is no uniform code that specifically regulates media conduct in sub judice matters.<sup>19</sup>

This legislative vacuum allows media houses to operate without effective accountability, often citing **Article 19(1)(a)** (freedom of speech and expression) as a blanket justification for intrusive reporting. While restrictions under **Article 19(2)** permit reasonable limitations for maintaining public order and protecting fair trial rights, these limitations have not been sufficiently codified in the context of media trials.

#### **B. Tension Between Free Press and Fair Trial**

Another pressing challenge is the inherent tension between the freedom of the press and the right to a fair trial. The press is constitutionally mandated to inform citizens and act as a watchdog over state institutions. However, in criminal matters, sensationalized reporting can undermine the **presumption of innocence** by portraying suspects as guilty before courts

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<sup>18</sup> V. Venkatesan, "The Media Trial of Rhea Chakraborty," *Frontline* (September 2020).

<sup>19</sup> *Sahara India Real Estate Corp. Ltd. v. SEBI*, (2012) 10 SCC 603.

pronounce judgment.

This conflict is especially visible in high-profile cases where news coverage is driven by **ratings competition**, resulting in speculative reporting, leaked investigation details, and even “sting operations” that compromise procedural fairness.<sup>20</sup> The judiciary, while recognizing press freedom, has repeatedly cautioned against prejudicial coverage that interferes with due process. Yet, striking the balance remains elusive.

### **C. Weakness of Self-Regulation Mechanisms**

In India, the **Press Council of India (PCI)** and the **News Broadcasting Standards Authority (NBSA)** function as self-regulatory bodies. However, their powers are largely advisory, lacking binding enforcement mechanisms. Their decisions often result only in mild admonitions, with no real deterrent effect on powerful media houses.

In contrast, international jurisdictions provide stronger oversight. For example, the **United Kingdom’s Contempt of Court Act, 1981** explicitly prohibits publication of material that creates a “substantial risk of serious prejudice” in active legal proceedings. Similarly, the **Federal Communications Commission (FCC)** in the United States enforces ethical broadcasting standards, backed by statutory powers. While the First Amendment strongly protects free speech in the U.S., courts have developed doctrines such as *Sheppard v. Maxwell* (1966) to safeguard defendants’ rights against media influence.

India’s reliance on voluntary codes, without statutory teeth, continues to weaken judicial integrity when media trials spiral out of control.

### **D. Judicial Hesitancy and Inconsistent Enforcement**

Although Indian courts possess contempt powers, they have often been reluctant to wield them robustly against the media, possibly fearing accusations of censorship. For instance, while the Supreme Court in *Sahara India Real Estate v. SEBI* recognized the judiciary’s authority to issue postponement orders to restrict prejudicial reporting, such orders remain rare in practice.<sup>21</sup> This hesitancy allows sensationalized coverage to continue unchecked, with limited accountability.

Moreover, inconsistent enforcement creates uncertainty: in some cases, courts issue stern warnings; in others, they adopt a lenient stance. The absence of a clear judicial policy

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<sup>20</sup> A.G. Noorani, *Constitutional Questions in India* (Oxford University Press, 2012), p. 214.

<sup>21</sup> *Sahara India Real Estate Corp. Ltd. v. SEBI*, (2012) 10 SCC 603.

emboldens media houses to push the boundaries of permissible reporting.

### **E. The Role of Social Media and New Media Ecosystem**

The rapid expansion of social media platforms presents an additional layer of complexity. Unlike traditional media, digital platforms are largely unregulated, enabling the rapid spread of misinformation, conspiracy theories, and prejudicial narratives. Viral hashtags and online campaigns can create immense public pressure on courts, sometimes even influencing investigative agencies.

The anonymity and speed of social media make traditional regulatory models ineffective. Courts face increasing challenges in addressing contemptuous publications that are not confined to established news outlets but proliferate through user-generated content.

## **CONCLUSION**

The issue of media trials is a major concern in today's constitutional democracies. A free and active press is essential for promoting transparency, accountability, and an informed public. However, judicial integrity and the right to a fair trial are the cornerstones of the rule of law. If either value is weakened, democratic governance may fall into populist showmanship or authoritarian control.

In India, judicial pronouncements demonstrate the judiciary's awareness of this delicate balance. Landmark cases such as *Sahara India Real Estate v. SEBI* and *State of Maharashtra v. Rajendra Jawanmal Gandhi*<sup>22</sup> reaffirm the principle that trial by media cannot override trial by courts. Yet, the persistence of sensationalized reporting, inconsistent judicial responses, and the absence of statutory clarity continue to weaken the protection of judicial independence.

The comparative perspective highlights India's unique dilemma. Unlike the U.K., which has laws against harmful publications, or the U.S., where constitutional protections coexist with court safeguards, India mainly depends on contempt jurisdiction and voluntary codes of conduct. This mixed regulatory model is becoming less effective, especially in the era of social media, where stories are shaped in real time and often disconnected from factual accuracy or legal standards.

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<sup>22</sup> *State of Maharashtra v. Rajendra Jawanmal Gandhi*, (1997) 8 SCC 386.

Thus, the challenge before Indian democracy is not to curtail press freedom but to **reconcile it with the equally compelling right to a fair trial**. Judicial integrity, public confidence in courts, and the presumption of innocence are not negotiable values—they are the cornerstones of justice.<sup>23</sup>



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<sup>23</sup> N. K. Jayakumar, “Social Media and Judicial Integrity,” *Journal of Indian Law & Society*, Vol. 12 (2020), p. 67.