

# The Crime & Justice Gazette

NEWSLETTER BY GNLU CENTRE FOR RESEARCH IN CRIMINAL JUSTICE SCIENCES

*"Mike Kattan: How does it feel, Hank? Knowing that every client you represent is guilty?"*

*Hank Palmer: It's fine. Innocent people can't afford me."*

- The Judge (Netflix Original)

*"Raman Raghav was India's one of the most infamous serial killers would be an understatement"*

*"Court does not follow majoritarian morality but constitutional morality."*

- CJI Dipak Misra



*"I cannot understand honest men. They lead desperate lives full of boredom": Victor Lustig*

# MESSAGE FROM THE CENTRE-HEAD

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May the truth always win and good triumph over evil.

It is my utmost pleasure to write this message in the Second edition of the Crime and Justice Gazette, a newsletter by the GNLU Centre for Research in Criminal Justice Sciences. Truth, courage & bravery, these qualities are a must for every criminal case that is to be instituted, investigated and tried.

Our Hon'ble Director Sir, Prof Dr. S. Shanthakumar, who laid the foundation of this centre, two years before, made its mandate clear that GCRCJS should bring out study, research and training in every aspect of criminal justice and the present Newsletter, is one step ahead in the same direction.

This is the result of the hard work of our student team, which has infinite zeal and never ending motivation. I wish the team every success and also hope that this newsletter will fill the gap of information in the field of Criminal laws for its readers. My best wishes to the student convener (Nihal), who has made this newsletter a reality, to the editors, to every team member as contributors, and every reader, who will let us know improvements and enable further excellence in this endeavor.



Dr. Anjani Singh Tomar

# MESSAGE FROM THE TEAM

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The GNLU Centre for Research in Criminal Justice Sciences, ever since its inception, is making continuous efforts to improve the culture of Research and Analysis in the field of Criminal Law and Justice System. The Centre has seen new heights in the past three months after the new team for the Academic Year 2021-22 was constituted. In the said time, we have managed to successfully conduct one National Essay Writing Competition; a Certificate Course on Cyber Crime, Cyber Forensics and Law (in collaboration with National Forensic Sciences University, Gandhinagar and Police Academia Interactive Forum); three sessions of “Crime & Justice: A Discourse Series” on some of the pertinent topics having great contemporary relevance; several research posts for our instagram page. The centre provides a platform for a holistic research environment and aims to further knowledge and academic discussions about the multifaceted dimensions of criminal science.

GNLU Centre for Research in Criminal Justice Sciences is committed to achieving a goal of motivating law students to do research, especially in criminal law. And, for the same here we are with our first ever newsletter 'The Crime & Justice Gazette' which aims to cover contemporary developments as well as criminal law cases and events from the past.

We would like to express our heartfelt gratitude to our Hon'ble Director Sir, Prof Dr. S. Shanthakumar, for his unwavering support, as well as our Faculty Convenor, Dr. Anjani Singh Tomar, for believing in us and encouraging us to pursue our research in every possible direction.

## Disclaimer

The authors' opinions expressed in the newsletter are their own, and neither GCRCJS nor GNLU is responsible for them. The case briefs solely summarise the current state of the cases' verdicts or orders, and do not cover anything with respect to future proceedings or appeals. The newsletter is only for internal circulation in GNLU and will be available on the GCRCJS official webpage on a later date.

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# P R E F A C E

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Criminal law is a dynamic study of law that undergoes development at every curve of dawn. This newsletter attempts to encapsulate the recent advancements in criminal law through various judgements, movie reviews and report analysis.

To begin, the author has presented a comprehensive study of the landmark case, Navtej Singh Johar v. Union of India. The brief provides an in-depth examination of the judgement, as well as observations and case analysis. Several in-news case briefs on recent decisions and rulings have also been compiled, and so has a wrap-up of the trending Aryan Khan NCB Case.

The newsletter explains how a fraudulent artist sold the Eiffel Tower twice, and how the so-called Jack the Ripper of India descended onto Bombay, paralysing the city of dreams with dread. In addition, to raise your legal understanding, we have an article dedicated to cybercrime legislation. We've also provided a movie review of Netflix's Original- the Judge for the cinephiles. The fun doesn't stop there; there's also a criminal mystery to incite the detective in you.

# RECENT DEVELOPMENTS

## **Attorney General for India v. Satish and Another (2021 SCC Online SC 42)**

In the Supreme Court of India

*Supreme Court stays Bombay High Court's "dangerous precedent"- No sexual assault if no 'skin to skin' contact under POCSO Act.*

**Sections 342, 354 and 363 of the Indian Penal Code, 1860.**

**Section 8 of the Protection of Children from Sexual Offences Act, 2012.**

The accused was acquitted under Section 8 of the POCSO Act, 2012 on the grounds that there was no sexual intent while committing the crime under the POCSO Act as there was no direct physical, i.e., skin to skin, contact.

The order was issued after Attorney General of India K. K. Venugopal notified the Apex Court that this judgement issued by the Nagpur Bench of the Bombay High Court on January 19, 2021, is likely to establish a "dangerous precedent." The Attorney General submitted an official petition against the aforementioned verdict and stayed the acquittal in the meantime.

In the apparent absence of any specific facts as to whether there was direct or indirect bodily contact, the Bombay High Court's decision that the act lacking skin to skin touch would not fall under the definition of 'sexual assault' was therefore overruled by the three-judge bench comprising of SA Bobde, CJ, AS Bopanna, J, and V. Ramasubramanian, J. The court noted that, "*While penal statutes must be construed strictly, it was apparent that the statute was not only meant to protect only unclothed girl...It is not necessary that the bare skin of minor be touched.*"

## **Court on its own Motion v. State (CRL.REF. 1/2020)**

In the Delhi High Court

*Court Issues TimeLine For Completing 'Age Determination' Of 'Juveniles In Conflict With Law'.*

**Section 105 of the Juvenile Justice (Care and Protection of Children) Act, 2015.**

The Court while dealing with a criminal reference in which a Principal Magistrate of a Juvenile Justice Board (JJB) raised legal problems about the circumstances in which a juvenile in dispute with the law also happens to be a child in need of care and protection.

The Court granted the Delhi Government four weeks to provide information pertaining to petty offence inquiries pending before all JJBs in Delhi between six months and one year, including the number of such cases, the date of institution of the inquiry, and the date of first production of the juvenile in conflict with law.

Lately, the Court instructed that all cases alleging petty offences against children or juveniles in violation of law, where the investigation has been pending and remains inconclusive for more than one year, be terminated with immediate effect, regardless of whether such child or juvenile has been produced before the Juvenile Justice Boards in Delhi.



Source: Bar & Bench



**Irappa Siddappa Murgannavar v. State of Karnataka (2021 SCC Online SC 1029)**

In the Supreme Court of India

*Low age of the rape victim is not considered as the only or sufficient factor for imposing a death sentence.*

Sections 302, 376, 364, 366A and 201 of the Indian Penal Code, 1860.

The deceased was a five-year-old girl who was raped, strangled, and then disposed of by wrapping her body in a gunny sack and throwing it into the Bennihalla stream. Since there were no eyewitnesses to the commission of the offences, the prosecution depended on three stances to prove postulations:

Firstly, that the appellant took the deceased from a neighbour's house on 28th December 2010;

Secondly, that the appellant was last seen by certain witnesses carrying the deceased and a gunny bag towards the Bennihalla stream; and

Lastly, that based on the appellant's disclosure statement on 1st January 2011, the body was discovered in the stream in a gunny bag.

The High Court had noted this in the category of 'rarest of the rare' cases and awarded a death sentence.

However, the Apex Court ascertained that the appellant's young age at the time of the crime (23/ 25 years), his poor socioeconomic background, the lack of any criminal antecedents, the non-premeditated nature of the offence, and the fact that he had already spent nearly 10 years 10 months in prison outweighed other mitigating factors, which added up against the imposition of the death penalty, which is to be inflicted only in the rarest of the rare cases.

Therefore, the bench partly allowed the appeal by commuting the death sentence to that of life imprisonment.

**The State of Jammu and Kashmir v. Dr Saleem ur Rehman (LL 2021 SC 618)**

In the Supreme Court of India

*For the investigation of a non-cognizable offence along with a cognizable one, the Magistrate's prior sanction will not be required.*

Section 120B of the Ranbir Penal Code, Section 155 of the J&K Code of Criminal Procedure and Section 5 (1)(d) r/w 5 (2) of the J&K Prevention of Corruption Act.

An FIR was filed under Section 5 (1)(d) r/w 5 (2) of the J&K Prevention of Corruption Act, 2006 and Section 120B of the Ranbir Penal Code.

The FIR alleged that the Director Health Services in Kashmir and other accused persons had purchased sub-standard medical kits under National Rural Health Mission for a high price while also violating the conditions of supply orders placed by the department thus pointing to misappropriation of government funds.

The Apex Court held that the HC had acted in contravention to the SC precedent Pravin Chandra Mody v. State of Andhra Pradesh, 1965 (1) SCR 269 in which the court held that the prior sanction of the Magistrate to jointly investigate cognizable and non-cognizable offence is not needed under Section 155 of CrPC.

Hence while quashing the HC judgment, the SC stated that the Prevention of Corruption Act is a substantive offence.

When it is being coupled with the offence of conspiracy, prior sanction is not required as it will then lead to prolonging and deviating the route of investigation.

**Dinesh Mahajan v. Vishal Mahajan (LL 2021 SC 620)**

In the Supreme Court of India



*Without a filed complaint the mere apprehension of threat to life is not a sufficient ground to transfer a case.*

**Sections 420 and 506 of the Indian Penal Code, 1860.**

Petitioner has filed for a transfer petition based on the apprehension of threat to life on receiving a notice. However, he had not lodged a complaint to the court or any other authority.

The court held that the petitioner had not substantiated his grounds for the transfer of the petition and that the mere apprehension did not allow for a transfer of the petition.

**Ganesan v. State (LL 2021 SC 614)**

In the Supreme Court of India

*An accused cannot be convicted under Section 397 of the Indian Penal Code if he hasn't used any deadly weapon at the time of committing robbery/dacoity.*

**Section 397 of the Indian Penal Code, 1860.**

The initial FIR was filed against 5 people under Section 395 r/w Section 397 of the IPC.

However, two of the 5 accused were absconding hence they were tried separately and the other three were tried together.

After investigation, the trial court ordered conviction of those three under Section 397 of IPC. The HC confirmed the order during the appeal.

The Apex Court set aside the conviction under Section 397 of IPC but convicted them under Section 395 IPC and gave a sentence to undergo 7 years of rigorous imprisonment.

This is because it is observed that the accused shall not be tried under Section 391 IPC on the basis of constructive liability and only the accused who uses a 'deadly weapon' can be tried.

The court referred to Phool Kumar vs. Delhi Administration and Dilawar Singh vs. State of Delhi and held that the term "offender" under Section 397 includes a person who uses any deadly weapon during the robbery.

The court also held that one of the co-accused who didn't use any deadly weapon must not be convicted under Section 397 with the accused who used a deadly weapon. In the present matter, there was no allegation that the three accused used deadly weapons hence the same failed.

In another issue whether the three accused can be tried for dacoity under Section 391 of IPC because the other two accused were absconding, the court held that only three accused present in the trial for an offence committed by five persons doesn't absolve them from the liability under Section 395.

**Sunil Kallani v. State of Rajasthan Through Public Prosecutor (S.B. Criminal Misc. Bail Application No. 9155/2019)**

In the Rajasthan High Court

*Anticipatory bail application of a person already in custody for a criminal offence will not be maintainable in another different criminal case filed for the same or different offence.*

**Section 438 and Section 46 of Cr.P.C**

An accused was already in custody for a criminal offence committed by him, however he has applied for an anticipatory bail for other offences committed by him.

The question which arose was "whether an anticipatory bail application would be maintainable by an accused who is already arrested and is in judicial custody in relation to another FIR registered against him for the offences mentioned therein." The court held that as per Section 438 of CrPC, the essential ingredient for a person to avail anticipatory bail

is when he has reasons to believe that he may be arrested.

However, in the present case, the person was already arrested and in custody hence he cannot possibly have the reasons to believe that he will be arrested “as he stands already arrested”.

An anticipatory bail cannot be granted for offences committed by a person who is already in custody as the subsequent FIRs filed by the persons are done by exercising their own right hence the accused has to undergo the proper trial and investigation for each and every case.

### **Jitul Jentilal Kotecha v. State of Gujarat & Ors. Etc (2021 SCC Online SC 1045)**

In the Supreme Court of India

*A High Court cannot place reliance on a "draft charge-sheet" which is yet to be placed before the Magistrate to quash the criminal proceedings under Section 482 of Criminal Procedure*

**Section 482 of the Code of Criminal Procedure 1973.**

**Section 385, 389, 418, 477, 506 , 120B and 34 of the Indian Penal Code 1860**

**Sections 465, 467, 468 and 120B of the Indian Penal Code 1860.**

In the present case, an FIR was registered against the accused under Sections 465, 467, 468 and 120B of the IPC by the Gandhigram Police Station, Rajkot on a complaint.

In the petition filed under Section 482 CrPC by the accused, the High Court directed that the investigation may continue but the charge-sheet be filed only with the Court’s permission.

A draft charge-sheet was placed before the High Court for offences punishable under Sections 385, 389, 418, 477, 506 , 120B and 34 of the IPC.

Taking note of the contents of the draft charge sheet, the High Court quashed the FIR against some of the accused.

The court relied on *Pratibha v. Rameshwari Devi (2007 SCC OnLine SC 1129)*, which held that the High Court can neither direct an investigating agency to submit the investigation report before it nor can it quash a criminal proceeding under Section 482 relying on such a report when the report has not been submitted to the Magistrate.

Therefore, it was held that the High Court transgressed the limitations on the exercise of its jurisdiction under Section 482 of the CrPC in quashing the FIR and all consequential proceedings. It noted that there had been a clear abuse of the process before the High Court. And as a consequence, the Court set aside the impugned judgement.

### **Ravindranatha Bajpe v. Mangalore Special Economic Zone Ltd. & Others Etc. (2021 SCC Online SC 806)**

In the Supreme Court of India

*Chairman, Managing Director/Executive Director etc., of a company cannot be summoned in a criminal case if specific allegations about their particular role is not alleged in the complaint, as they cannot be vicariously held liable for the criminal acts of the company.*

**Sections 406, 418, 420, 427, 447, 506 and 120B read with Section 34 of the Indian Penal Code 1860.**

The case was on behalf of the complainant that the company, Mangalore Special Economic Zone Ltd and its contractor company had trespassed into the complainant's property and had demolished their compound wall while laying down a pipe line.

The Magistrate initiated the process against the accused who were Chairman/Managing Director/Executive Director/Deputy General Manager/Planner & Executor of the company.

On behalf of the accused, it was contended that issuing summons/process by the Court is a very serious matter and therefore unless there

are specific allegations and the role attributed to each accused instead of a bald statement, the Magistrate ought not to have issued the process.

The court held that merely because respondent Nos. 2 to 5 and 7 & 8 are the Chairman/Managing Director/Executive Director/Deputy General Manager/Planner & Executor, automatically they cannot be held vicariously liable, unless, as observed hereinabove, there are specific allegations and averments against them with respect to their individual role. Instead of the consequence the High Court had rightly dismissed the revision applications and therefore dismissed the appeal.

**Gaurav Thakur v. The State of Himachal Pradesh through district magistrate, Shimla (2021 SCC HP 7743)**

In the Himachal Pradesh High Court

*20-Year-Old allegedly found in conscious possession of 19 gram "Chitta" granted bail by court noting his "Tender Age"*

Section 21 of the Narcotic Drugs and Psychotropic Substances Act 1985.  
Section 439 of CrPC.

On 19.08.2021, a group of policemen were on duty near Hira Nagar, keeping an eye on the movement of vehicles. During the course of checking one bus, the petitioner was found holding an orange-coloured zipper in his arms which contained 19.5 grams of Chitta. The mode and manner in which the recovery was taken into effect also showed that the petitioner was involved in the sale of drugs.

It was argued on behalf of the State that taking into consideration the gravity of the offence, the present petitioner did not deserve to be released on bail.

The petitioner however argued that as the investigation was complete with no recovery etc. and remains to be affected at the instance

of the petitioner, the petitioner be released on bail as no purpose would be served by detaining him further in custody.

The court took into consideration the totality of the circumstances involved in this case, including the factum of the petitioner being a 20 year old boy and no previous criminal history, granted bail to the petitioner.

The court made this observation on the ground that it was not in dispute that the contraband recovered was from the conscious possession of the petitioner or the intermediate quantity of the contraband, rather took into consideration the tender age of the petitioner.

**Rishipal Singh Solanki v. State of Uttar Pradesh & Ors. (LL 2021 SC 667)**

In the Supreme Court of India

*For the purpose of the Juvenile Justice Act 2015, the age recorded by the Juvenile Justice Board or the Child Welfare Committee of the person so brought before it will be deemed to be the true age of the person.*

Sections 147, 148, 149, 323, 307, 302 and 34 of the Indian Penal Code, 1860.

In the present case, an incident occurred on 05.05.2020 inter alia, respondent no.2 – Nishant Solanki along with the other accused were alleged to have attacked upon the appellant and his family causing serious injuries as well as death of appellant's father Bhopal Singh, who was declared 'brought dead' by the doctor on the same day.

The victim of the crime petitioned the Supreme Court to overturn the accused's declaration as a juvenile and try him as an adult. The petitioner argued that in the instant case, there was no other document indicating the date of birth of the person contrary to what had been indicated in the matriculation certificate and that the matriculation certificate could not be a conclusive document for determining the juvenile's age, regardless of other material

discrepancies in the witnesses' oral testimony or other documents produced.

The court held that, while Section 94 of the Act raises a presumption regarding juvenility of the age of the child brought before the JJ board or the Committee, in case the Board or Committee has reasonable grounds about them being a child or not, it can undertake the process of determination of age by seeking evidence.

**Ananthasamy and Sneka v. State rep by, The Inspector of Police, Thilagar Thidal Station, Madurai (MANU/TN/7590/2021)**

In the High Court of Madras, Madurai Bench.

*The right to protest is well recognized with the only qualification being that it should not end in any violation of criminal proceedings. An initiated proceeding pursuant to an FIR was quashed noting that the identification of persons, who were involved in the occurrence, was not properly investigated.*

**Sections 143, 341, 283 and 290 of the Indian Penal Code, 1860.**

The case involves the protest made by the petitioners against the Amendment of CAA (Citizenship Amendment Act). The petitioners belong to one organisation called '*Makkal Athikaram*'.

The members of the said organisation numbering about 18, made a protest, without getting proper permission from the authorities, they also made slogans against the Government and condemned the assault made upon the students of the Jamia University, Delhi.

A reading of the First Information Report showed that they protested by shouting slogans against the amendment Act and the Government. The petitioners did not deny their participation, however, stated that their names didn't appear in the FIR.

The initiation of the proceeding without getting adequate permission, is not correct.

But, an entire reading of 161 statements recorded during the course of investigation, highlighted that the identification of persons, who were involved in the occurrence, was not properly investigated.

Furthermore, since the protest was peaceful and even the First Information Report did not disclose any act of violence or happening of untoward incident, the court held that the continued prosecution of petitioner was not warranted.

**Dhyaan Foundation v. State of Odisha and Ors. [W.P.(C) NO.33796 OF 2021]**

In the High Court of Orissa at Cuttack

*The auction of milch cows with calves shall not amount to cruelty or abandonment of animals.*

**Orissa Prevention of Cow Slaughter Act, 1960.**  
**The Prevention of Cruelty to Animals Act, 1962.**

Under the provisions of the Prevention of Cruelty to Animals Act, 1960, the Bench of Justice Jaswant Singh and Justice S K Panigrahi was hearing a petition moved by Dhyaan Foundation, a registered trust engaged in the rescue, care, treatment, and rehabilitation of animals.

The Foundation disputed the auction notice for the sale of livestock (seven cows with calves) scheduled for November 3, 2021, on the premises of the Biju Pattanaik Open Air Ashram in Jamujhari. The organisation argued that the cows would suffer at the hands of butchers for slaughter, and that the auction must be prevented.

But the High Court opined that the auction of milch cows with calves would not amount to any form of cruelty or abandonment of the animals and shall definitely not evoke provisions of the Orissa Prevention of Cow Slaughter Act, 1960 and The Prevention of Cruelty to Animals Act, 1962.

The Court held that "*The mere apprehension of the petitioner-Trust that such animals or cows*

would land in the hands of butchers for slaughtering is not enough to persuade us to invoke our writ jurisdiction.”

It further remarked that “We have no doubt that the official authorities conducting the auction would be totally alive to the safety and welfare of the animals.”

The writ petition was thus dismissed.

**Dr. Manish Tiwari v. State of Chhattisgarh (WPCR NO. 363 OF 2018)**

In the High Court of Chhattisgarh.

*“Madam, If You Want Leave, Come & Meet Me Alone” does not classify as a sexually colored remark to fall within Section 354A of the Indian Penal Code.*

**Section 354A of the Indian Penal Code, 1860.**  
**Section 3(1)(xii) of the The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989.**

An FIR was filed against the accused by the prosecutrix because he passed a remark that “Madam, If You Want Leave, Come & Meet Me Alone” which in her opinion was of a sexually colored nature.

It was contended by the respondents that the prosecutrix is a professor and a colleague of the accused at D.P. Vipra College in Bilaspur, and if she is unable to carry out her duties without fear, the entire academic faculty will suffer greatly.

The accused will gain more boldness and confidence, while the students will experience fear. The students are the most vulnerable cohort in the university if the faculty members are unsafe in such an undesirable working environment.

The High Court held that *“If we see that the contents of the complaint wherein the*

*complainant has stated that the petitioner has said that “Madam, if you want leave, come and meet me alone” as which cannot be inferred that there is any sexual coloured remarks against her. The remarks made by the petitioner towards her conversation do not fall within ambit of sexual harassment in order to prosecute the petitioner for commission of offence under Section 354 (A)(iv) of IPC.”*

It further held regarding applicability of Section 3(1)(xii) of the The Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 that

*“Apart from the fact that the prosecutrix belongs to the Scheduled Caste community and the accused belongs to different community, there is nothing on record to show that the crime was perpetrated by the petitioner for the sole reason that the prosecutrix belonged to Scheduled Caste community.”*

Accordingly, the accused was not found guilty under either of the two provisions and the FIR was quashed.



Source: Land Portal

# ARYAN KHAN NCB CASE IN A NUTSHELL

NIYUSHA BHESANIA

On October 3, Aryan Khan was detained in line with a Narcotics Control Bureau drugs raid. The NCB's Mumbai branch, led by the zonal director, Sameer Wankhede, seized a cruise off the city's shore, and Aryan Khan and many others were detained and charged with accusations of consumption and 'conspiracy,' of drugs among other charges.

Aryan Khan then appeared in Mumbai courts on October 3rd, seeking bail. The magistrate's court in Mumbai denied Aryan Khan's and two others, stating that a Special Court under the NDPS Act would have valid jurisdiction to hear their appeals. The Bombay High Court granted Aryan Khan bail on October 28 after several days of court proceedings based on drug usage and possession.

The story went as, Aryan Khan left his residence in Mumbai's Bandra on October 2 to attend a party on Cordelia Cruises' Empress ship. A Delhi-based events agency had arranged a two-days musical trip. Following a tip, a team from the NCBs Mumbai division boarded the cruise undercover as passengers. NCB officers conducted a search on board the ship, and soon, the following night, it was announced that the NCB had confiscated multiple illicit narcotics such as cocaine, *charas*, and MDMA from the ship and detained 7-8 suspects.

As per the arrest memo, Aryan Khan was arrested for "involvement in the consumption, sale, and purchase" of contraband. During the investigation on Cordelia Cruises' ship, the NCB alleged to have confiscated 13 gms of cocaine, 5 gms of MD, 21 gms of *charas*, 22 capsules of MDMA (ecstasy), and Rs 1.33 lakh in cash. Following this, Aryan Khan was accused under four sections of the Narcotic Drugs and Psychotropic Substances Act,



Source: Quint

1985 (NDPS). These included Section 8 (c), Section 20(b), Section 27, and Section 34.

While the agency acknowledged that Aryan Khan was not confirmed in possession of any narcotics, it argued against the bail petition, claiming that the continuing investigation into the arrest might lead to an intercontinental racket. Finally, the Bombay High Court declared, "Aryan Khan as innocent, as the court found no proof of conclusive evidence against Aryan Khan and two others."

According to the judgement, "the evidence on record was sufficient to persuade this Court that all of the accused parties with common purpose consented to perform an unlawful act, that there was no substantive evidence linking all three applicants to other co-accused on the conspiracy charge." Further, the Justice continued, "this Court is of the opinion that the claim put forth by the NCB under the Drug Act of having commercial quantities in the backdrop of a case of hatching a conspiracy is liable to be rejected".

The court also ruled that Khan and others were not subjected to any medical tests to ascertain whether or not they had consumed narcotics at the period in question. Eventually, even Khan's leaked WhatsApp communications were deemed to be inadmissible as evidence against him. As no prima facie case could be established, Aryan Khan was released and affirmed innocent.

# NAVTEJ SINGH JOHAR V. UNION OF INDIA (AIR 2018 SC 4321)

A Case Comment by: BHANUPRATAP SINGH RATHORE

IN THE SUPREME COURT OF INDIA

CRIMINAL ORIGINAL JURISDICTION

WRIT PETITION (CRIMINAL) NO. 76 OF  
2016

NAVTEJ SINGH JOHAR & ORS. ...  
Petitioner(s)

VERSUS

UNION OF INDIA THR. SECRETARY  
MINISTRY OF LAW AND JUSTICE ...  
Respondent(s)

BENCH – (5)Then Chief Justice Dipak Misra,  
Justice A.M. Khanwilkar, Justice Rohinton  
Fali Nariman, Justice D.Y. Chandrachud and  
Justice Indu Malhotra

NUMBER OF OPINIONS – 4

NATURE AND DATE OF JUDGMENT –  
Unanimous and 06-09-2018 respectively.

COUNSEL FOR PETITIONERS – Mukul  
Rohatgi and Others

COUNSEL FOR RESPONDENT – Add.  
Solicitor General Tushar Mehta

CASE STATUS – Disposed and not overruled.

## INTRODUCTION:

Consensual sexual intercourse between persons of the same sex had been declared illegal under Section 377 of the Indian Penal Code (IPC) because of it being “*against the order of nature.*” The case's core issue was the constitutional legitimacy of Sec 377 of IPC, 1860 (Section 377) as it applied to private

voluntary sexual activity between adults of the same sex. 'Unnatural Offenses,' as Section 377 was termed, said that “[w]hoever voluntarily has carnal intercourse against the order of nature with any man, woman or animal shall be punished with imprisonment for life, or with imprisonment of either description for a term which may extend to ten years, and shall also be liable to [a] fine.” The court held that penalizing sexual conduct between two consensual adults under Sec 377 of IPC, 1860, infringes on those people's right to privacy, personal liberty and equality.

## FACTS OF THE CASE:

The case arose in 2009, when the High Court of Delhi ruled that Section 377 was unconstitutional in the context of consenting sexual contact between two adults of the same sex, in the case judgment of “Naz Foundation v. Govt. of N.C.T. of Delhi”. In the decision of “Suresh Kumar Koushal v. Naz Foundation,” a two-judge bench of the Supreme Court overruled the High Court of Delhi's judgement and gave Section 377 “the stamp of approval” “[p. 11, para. 9]”.

When the petition in this case was submitted in 2016, appealing the 2014 judgment, a three-judge Supreme Court bench ruled that the arguments raised needed to be addressed by a larger bench. As a result, the case was considered by a five-judge bench. Navtej Singh Johar, a dancer who recognised himself as a member of the LGBT community, registered a Writ Petition in the Supreme Court in 2016 pursuing acceptance of the right to sexuality, sexual autonomy, and the right to choose a sexual partner under the right to life guaranteed by Article 21 of the Indian Constitution (Constitution). In addition, he demanded that



Section 377 be declared unconstitutional. The Petitioner further claimed that Section 377 was unconstitutional under Article 14 of the Constitution (Right to Equality before the Law) as the Section did not describe "carnal intercourse against the natural order" making it ambiguous to interpret. [paragraph 26 on page 25] Between natural and unnatural consenting sex, intelligible differentia or reasonable classification is not visible.

The Petitioner also claimed, among other things, that –

1. As it differentiated on the basis of a person's sexual partner's sex section 377 was unconstitutional under Article 15 of the Indian Constitution (Protection from Discrimination),
2. Denying the right to voice one's sexual identity by expression and the choice of romantic/sexual partner, section 377 has a "chilling effect" on Article 19 (Freedom of Expression), and
3. Because of "a certain choice or manner of living," section 377 infringed on LGBT people's right to privacy by putting them in dread of being humiliated or rejected. [paragraph 21 on page 22]

The Government of India was the Respondent in the present case. Non-governmental organisations, religious entities, and other representative bodies, in addition to the Petitioner and Respondent, filed petitions to engage in the case.

## ISSUES RAISED

– Broadly Four issues were raised:

1. Whether discrimination based on sexual

Source: LiveLaw



Source: Scroll.in

orientation under “Section 377 of Indian Penal Code” infringes Right to Equality under Article 14 and Article 15 of the Indian Constitution?

2. If section 377 infringes right to autonomy and dignity including the right to privacy by criminalising private consenting activities between people of the same sex under article 21?

3. If the decision given in “*Suresh Kumar Koushal v. NAZ Foundation*” was reasonable in terms of interpreting morality as social morality?

4. If sec 377 of IPC, 1860 infringes upon “article 19(1)(a)” by penalizing the LGBTQ+ community's gender expression?

## ARGUMENTS ON BEHALF OF PETITIONER:

The Petitioners argued that homosexuality, bisexuality, and other sexual orientations were natural and based on legal consent, not medical or mental illnesses.

The Petitioners also claimed that outlawing sexual orientations went against the idea of individual dignity and decisional autonomy intrinsic in a person's personality, as well as Article 21's right to privacy.

Section 377 was unconstitutional because it prejudiced against the LGBTQ+ persons based on their sexual orientation, which was an integral part of privacy, and because sexual orientation and privacy were at the heart of "Articles 14, 19, and 21's fundamental rights".

## ARGUMENTS ON BEHALF OF RESPONDENTS:

As far as Section 377's constitutional legitimacy is associated with "consensual activities of same sex adults in private," it is entrusted to the discretion of the Court. [paragraph 8 on page 270].

(Some Intervenors claimed that Section 377 should be kept because) It advances "a compelling state interest in reinforcing morals in public life." [paragraph 39, p. 32]

Fundamental rights were not absolute, and Section 377 of IPC was not inherently discriminatory because it "criminalises acts, not people," applied equally to all unnatural sexual acts regardless of sexual orientation, and made illegal various forms of carnal intercourse by both the heterosexual and the homosexual partners.

## FINAL VERDICT

- Based on the findings of the case, it was determined that Section 377 violates Articles 14, 15, 19, and 21 of the Constitution inasmuch as it criminalises consenting sexual activities of adults (i.e. individuals over the age of 18 who are capable of consenting) in private.
- NAZ Foundation case overruled, and
- Partial decriminalization of sec 377 of IPC.



Source: NDTV.com

## JUDGMENT ANALYSIS:

On Issue 1 – The Court stated that Section 377 penalizes people who participate in same-sex relations arbitrarily. Furthermore, the Court found that Section 377 is obviously arbitrary because it does not differentiate between voluntary and non-consensual adult sexual conduct.

It singled out people who made particular decisions and viewed them as "less than humans," encouraging biases and preconceptions that had devastating social consequences. The Court ruled that discrimination against LGBT people infringes Articles 14 and 15.

On Issue 2 – Section 377 is in violation of Article 21 because it restricts the enjoyment of personal liberty to participate in consensual sexual conducts. It socially isolates LGBTQ+ people and prevents them from fully expressing their identity. Individuals' right to privacy is harmed when they are denied the right to determine their sexual orientation.

As a result, the Court determined that the ambit of right to privacy must be expanded to include and protect "sexual privacy." The Supreme Court ruled that Section 377 infringes on human dignity, decisional autonomy, and the right to privacy.

On Issue 3 – The Court relied upon its decision in *K.S. Puttaswamy v. Union of India (2017) 10 SCC 1* and held that denying the LGBT community its right to privacy on the ground that they form a minority of the population would be violative of their fundamental rights. It held that Section 377 amounts to an unreasonable restriction on the right to freedom to expression since consensual carnal intercourse in private "*does not in any way harm public decency or morality*" [p. 165, para. 253(xvi)] and if it continues to be on the statute books, it would cause a chilling effect that would "*violate the privacy right under Art. 19(1)(a)*" [p. 224, para. 83].



On Issue 4 – The Court considered if public order, decency, and morality are sufficient reasons to limit the right to freedom of sexual expression under "Article 19(1)(a)." Section 377, it was stated, explicitly prohibits private consenting actions that do not disrupt public peace or harm public decency or morality.

Sexual activities cannot be regarded simply through the lens of morality, in which they are viewed as solely for the sake of reproduction. Unreasonable restrictions on acts performed in a person's private space would stifle freedom of choice. As a result, the Court determined that Section 377 is excessive and infringes on the basic right to freedom of expression.

### SOME IMPORTANT OBSERVATIONS FROM JUDGMENT:

1. The legitimacy or approval of an occurrence should not be determined by its naturalness.
2. The Court defined "constitutional morality" as the Constitution's ideals and principles, as well as the virtues that foster an inclusive society.
3. The standards of constitutional morality, not public morality, must be used to determine whether a criminal law breaches fundamental rights.
4. According to the Court, India is an endorser to the Yogyakarta Principles, which ban biases based on gender identity and sexual orientation.



Source: Leaflet



Source: Legal Service India

In "NALSA vs. Union of India", these concepts were used to preserve the right to non-discrimination based on gender identification. The Court found that Section 377 is in violation of India's international commitments, citing the Yogyakarta Principles and NALSA.

### CASE COMMENT:

The Navtej Johar case resulted in a landmark decision. Law should be dynamic, i.e, it should change with social and cultural changes in society then only justice could be served and there could be progressive realisation of rights of people. The judgement in the present case clearly demarcates this doctrine.

The LGBTQ community has gone through a lot of social out casting and stigmatization and this community deserves equal rights and respect as any other individual and discrimination against a person based on their sexual orientation is extremely disrespectful to that person's dignity and self-worth. Supreme Court has pronounced a landmark judgement by decriminalizing 377 to certain extent and upholding right to equality in its true sense.

This judgement should be strengthened by proactive government initiatives to give LGBTQ+ community a meaningful existence. The state organs should work together to ensure that the court's decision has a greater favourable impact.

# LAWS AGAINST CYBER CRIME

VAIBHAV KESARWANI

Cybercrime is defined as the use of a computer as an instrument to further illegal ends, such as committing fraud, trafficking in child pornography and intellectual property, stealing identities, or violating privacy.

The laws against cybercrime are given under the Information Technology Act, 2000.

## Section 43A: Data protection at corporate level

This section is used in the situations when a body corporate fails to adopt appropriate security standards and a person suffers a wrongful loss or gain, the body corporate will be responsible to pay damages to the aggrieved person.

## Section 65: Tampering with computer source document

This section punishes the person who destroys or alters any computer program or source file which is required to be maintained by law. The punishment can be for 3 years or fine of 2 Lakhs INR or both.

## Section 66: Using password of another person

This section punishes the person who fraudulently uses the password, digital signature or other unique identification of another person, he/she can face imprisonment up to 3 years or/and a fine of 1 Lakh INR.

## Section 66D: Cheating using computer resources

This section punishes the person who cheats someone using a computer resource or a communication device, The punishment for such crime could be imprisonment up to 3 years or/and fine up to 1 Lakh INR.

## Section 66E: Publishing private images of others

If someone takes, transmits, or publishes photos of a person's private parts without their agreement or knowledge, they can face up to 3 years in jail and a fine of up to 2 lakh INR, or both.

## Section 66F: Acts of cyber terrorism

If a person refuses an authorised person access to a computer resource or attempts to penetrate/access a computer resource without authority with the intent to endanger the nation's unity, integrity, security, or sovereignty, he or she faces life imprisonment. This is a crime that is not punishable by a fine.

## Section 67: Publishing child porn or predated child online

If a person records, publishes, or transmits photos of a child engaged in a sexually explicit conduct, or causes anybody under the age of 18 to engage in a sexual act, the individual faces up to seven years in jail or a fine of up to ten lakhs INR, or both.



Source: Norwich University Online

# JACK THE RIPPER OF INDIA: RAMAN RAGHAV

NIYUSHA BHESANIA

Many people have heard about serial murderer Raman Raghav, who has been the subject of two films and a documentary. Raman Raghav will always be a critical figure in India's criminal history; however, his tale of dread and insanity precedes his notoriety.

Mumbai- the city which never sleeps, was once put to bed at an untimely hour, slum-dwellers who didn't think twice before sleeping the pavement were previously forced to go into hiding. Mumbai cops, who once had the crime by their neck, ran out of hands to put this puzzle together.

Raghav's victims were pavement and hut dwellers who had been brutalised to death with a hard weapon on the streets and suburbs. The first of these killings happened in Mumbai's eastern suburbs between 1965 and 1966. A homeless man was discovered wandering around the neighbourhood at the time. When the police apprehended him, he revealed himself to be Raman Raghav.

Raghav had previously spent five years in jail on robbery charges. He had also stabbed his sister innumerable times after raping her. The police, on the other hand, found nothing on him that might be linked to the killings and so let him go. When Raghav struck again in August 1968, the police, led by Deputy Commissioner of the Police- Ramakant Kulkarni, conducted a manhunt and captured him.

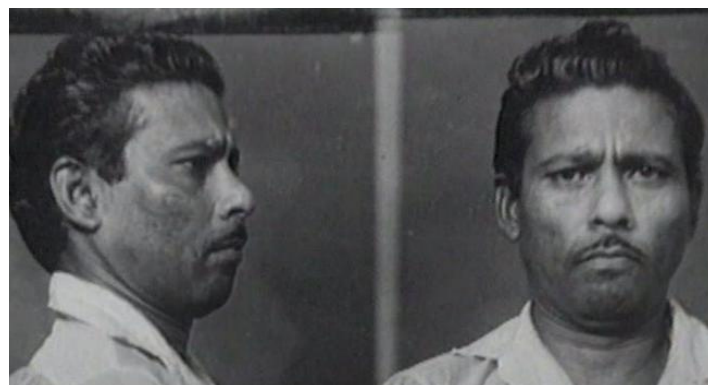
Raman's personal belongings, contrary to expectations, consisted of typical everyday commodities such as a pair of spectacles, a pair of scissors, combs, a burning incense stand, soap, tea dust, and two bits of paper with some math calculations. However, his clothing was bloodstained, and his fingerprints matched with those on the record. Raman resisted any

authorities during his detention, refusing to submit to interrogation and torture and refusing to speak about the killings.

Surprisingly, chicken curry solved the problem. He requested a meal of chicken curry while detained. When his wishes were granted, he submitted a thorough statement, including specifics on his weapon, his method of operation, and the real number of victims. Throughout the interrogation, he made different requests that had to be granted in order for him to speak. The cops finally had a face to place to the 40+ killings. The matter was then quickly transferred to sessions court.

Raman soon led the cops on a city- wide trip exhibiting the spots he had targeted, and also gave up the rod, his murder weapon, which he had buried in the northern suburbs. This serial murderer went under various identities, including "Sindhi Dalwai," "Talwai," "Anna," "Thambi," and "Veluswami."

Following this, he was subjected to psychiatric evaluation by a police surgeon in Mumbai for a month. He was declared mentally sound and "not certifiably insane" by the surgeon. Raman was sentenced to death by the additional sessions judge in Mumbai. He did not file an appeal.



Source: Scroll.in



Later, according to a Mumbai High Court judgement, a board of three psychiatrists appointed by the Mumbai Surgeon General investigated and questioned Raman at various dates and found that Raman was indeed mentally ill. He was sentenced to life in jail after his mental disorder, chronic paranoid schizophrenia, was determined to be "incurable."

Schizophrenia characterizes a sizable percentage of serial killers. Schizophrenia is a brutal mental condition in which patients have an aberrant interpretation of reality.

Schizophrenia includes hallucinations, delusions, and profoundly disturbed thoughts and behaviour that interferes with everyday functioning and could be debilitating.

Raman was imprisoned at the Yerwada Central Jail until he died of renal disease in 1995. Much of what we know about Raman Raghav now comes from the book Crimes, Criminals, and Cops by Ramakant Kulkarni, the super-cop who solved several high-profile crimes in Mumbai, including Raman's.

We get a peek into Raman's intriguing mindset in his book, and it's mind-boggling to say the least: Raman believed that there were two worlds- firstly, the realm of Kanoon (law) and secondly, the world in which he lived. When members of the government-appointed psychiatric board approached Raman, after Raman rejected the interview stating that he was from Kanoon and would not touch individuals from the other world.

He had a solid belief that everyone was attempting to alter his sex but failed since he came from the realm of kanoon. He imagined himself as Shakti or power. He also had a strange belief that people were constantly tempting him to have homosexual encounters and that if he had sex with a man, he would become a woman. He stated that he was 101 percent man.

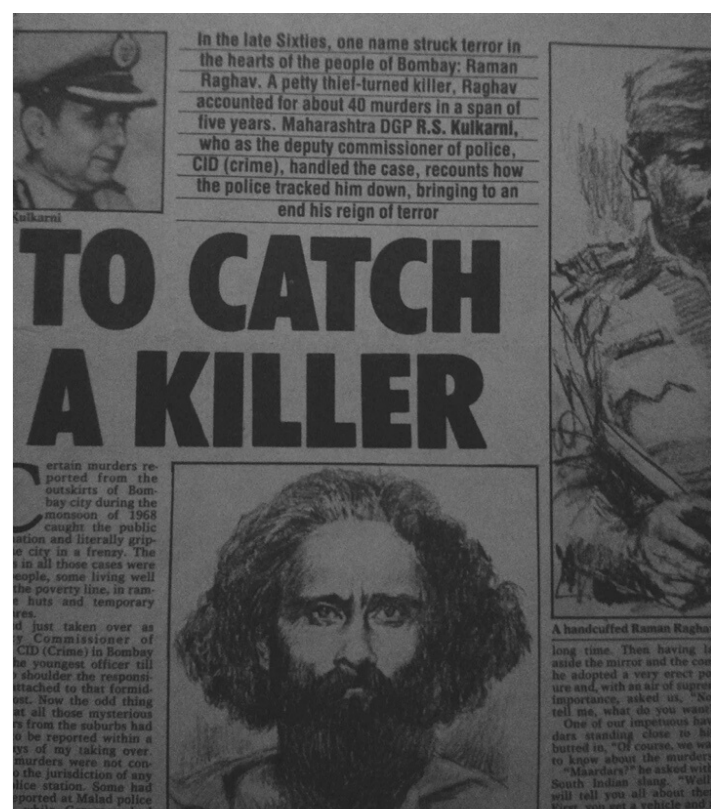
Infamous serial killers would be an

understatement. This serial killer has been in media quite lately with Director Sriram Raghavan's 70-minute feature film on him titled as "Raman Raghav - A City, A Killer", starring Raghuvir Yadav as the murderer. Raghav was also the subject of a 1978 Tamil film, "Sigappu Rojakkal".

Recently a Bollywood movie, "Raman Raghav 2.0", directed by Anurag Kashyap and featuring Nawazuddin Siddiqui in the eponymous character, is about a fictitious serial murderer who counts the serial killer Raman Raghav as his inspiration.

It has been more than 50 years now that the deranged serial killer, Raman Raghav crept out of the jungles of suburban Bombay at night and killed innocents to his heart's content, single-handedly terrorising the upwardly-mobile city of dreams.

This madman who descended onto Bombay and paralysed the city of dreams with fear is known by many as India's very own Jack the Ripper.



Source: theindianexpress

# FOR SALE: THE EIFFEL TOWER

ANYA DENISE ARANHA

*"I cannot understand honest men. They lead desperate lives full of boredom."*

*- Victor Lustig*

Victor Lustig is probably the smoothest con man that ever lived. Born in Hostinné, Czech Republic in 1890, he picked up the languages of Europe and then shifted base to France. Charming and sophisticated, he was an expert in tall tales and operated all while evading capture. His greatest feat was his landmark scam in "selling" the Eiffel Tower.

Lustig started off as a swindler on the transatlantic ocean liners by swindling financially well-off travelers. He swindled them by "inventing" a money-printing machine which could "print" \$100 bills. Gullible travelers believed his lucrative scam that the machine would take several hours to chemically process and print 2 \$100 bills. In reality, he had just loaded those real \$100 bills in the machine without them knowing. Believing that the machine actually printed money, these gullible travelers bought his "money-printing machine" for around \$30,000 (worth around £322,000 today). They would eventually realize that they were scammed, but by the time they did, Lustig would be long gone.

When Lustig was living in Paris, France in 1925, he read an article in the newspaper about how the Eiffel Tower was rusting and about how it needed repairs. The Eiffel Tower was built for the Paris Exposition of 1889 and the authorities intended to dismantle and move it to another location in 1909. Posing as the Deputy Director General of the Ministry of Posts and Telegraphs, Lustig sent out letters printed on phony government papers to five businessmen.

The letters invited the five businessmen to discuss a business proposition at the high-standing Hotel de Crillon. All five men came for the meeting. There, they were convinced by a smartly dressed, polished and courteous Lustig that the French government intended to sell the Eiffel Tower for scrap metal and were currently taking bids for the right of demolition of the tower. He stroked their egos by telling them that they had been recommended and chosen among many for their honourable reputations. Using a rented limousine, he asked the men to join him for a tour of the Eiffel Tower.

During the tour, Lustig identified Andre Poisson as a probable target. Desperate to join the ranks of the business elite of Paris, Poisson gave off an impression of insecurity - both socially and



Source: The Vintage News



financially. The deal was sealed - Poisson would “buy” the Eiffel Tower. During the swift and clandestine dealings between Lustig and Poisson, Poisson’s wife grew suspicious and planted seeds of doubt in Poisson’s mind. However, Lustig managed to erase suspicion from Poisson and his wife’s minds by “coming clean” and confessing that he wished to solicit a bribe from the sale contract. Now at ease, Poisson not only paid for the Eiffel Tower, but also paid Lustig a substantial bribe.

As Lustig had rightly predicted, Poisson was too ashamed to report the fraudulent scam and hence, Lustig got away scot free. After 6 months of the “sale”, Lustig tried to sell the Eiffel Tower again but did not succeed and evaded arrest very narrowly.

After this, he shifted base to the U.S. to continue his career as a criminal. There, he managed to swindle Chicago crime boss Al Capone. Lustig convinced him to invest \$50,000 in a stock deal and promised to double his invested money. Now with Al Capone’s money, Lustig put the money in a safe deposit box and returned it to Capone 2 months later. He apologetically told Capone that the deal had fallen through. Filled with appreciation for his “integrity”, the Chicago crime boss rewarded Lustig with \$5000. This escapade secured his reputation as one of the bravest and most dangerous con men in history.

Lustig had his own Ten Commandments for con men:

1. “Be a patient listener.”
2. “Never look bored.”
3. “Wait for the other person to reveal any political opinions, then agree with them.”
4. “Let the other person reveal religious views, then have the same ones.”
5. “Hint at intimate details, but don’t follow it up unless the other fellow shows a strong interest.”

6. “Never discuss illness, unless some special concern is shown.”

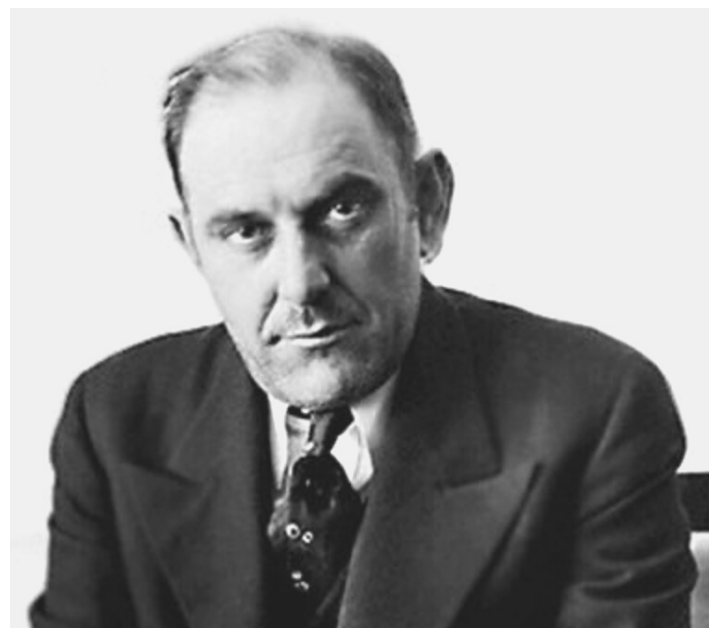
7. “Never pry into a person’s personal circumstances (they’ll tell you all eventually).”

8. “Never boast. Just let your importance be quietly obvious.”

9. “Never be untidy.”

10. “Never get drunk.”

Besides Lustig’s, other landmark scams include that of William McCloudy, a New Jersey con man, who sold the Brooklyn Bridge to a tourist in 1901; George C. Parker, an American con man, who sold many public landmarks in New York including the Brooklyn Bridge to tourists numerous times; and Anthony Lee, a Yorkshire truck driver, who attempted to sell the London Ritz Hotel for €250 million and was caught by the police after receiving a deposit of €1 million.



Source: Un Jour de Plus à Paris



Source: Medium

# MOVIE REVIEW: THE JUDGE (NETFLIX ORIGINAL)

ANYA DENISE ARANHA

Directed by David Dobkin, this 2014 movie stars Robert Downey Jr. and Robert Duvall as son and father. It is a 141-minute paragon of scrupulously created characters and events that weaves a warm tale of family bonding in the modest town of Carlinville, Indiana.

The movie opens when Hank Palmer (Robert Downey Jr.), a bumptious, thriving Chicago defense attorney who's in the middle of a divorce, rushes to his hometown Carlinville, Indiana when he hears of his mother's passing.

At the funeral, his meeting with the family opens old wounds. His elder brother Glen, the owner of a tire shop, keeps passing sarcastic remarks at Hank while his guileless autistic younger brother Dale keeps himself busy by shooting videos at home.

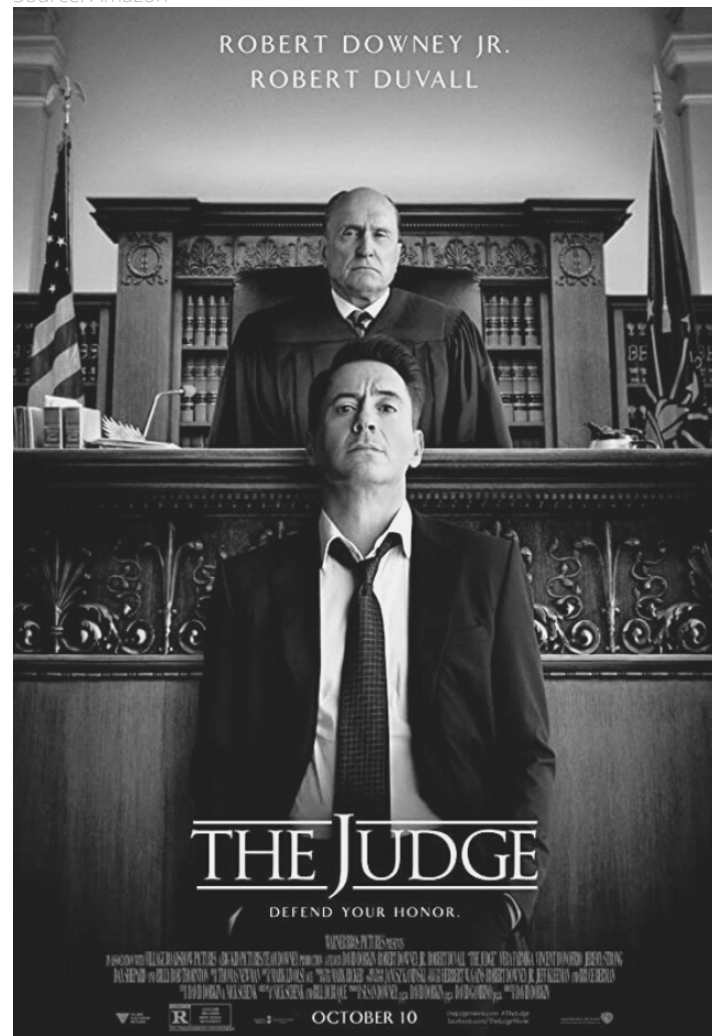
Hank's oldfangled father is Joseph Palmer (Robert Duvall), an upstanding judge at the criminal court of Carlinville. Hank and he share an estranged relationship because of a case wherein Hank met with a car accident when he was 17 years old which ruined Glen's future career. Rather than recommending Hank for community service or helping him out otherwise, Judge Palmer sent him to juvenile detention. At the funeral, Judge Palmer makes it plain with his bluntness that Hank has abandoned the family and chosen to focus only on his career. Hence, Hank's mother's funeral puts the family's old wounds in the limelight.

However, things soon take a turn for the worse when Judge Palmer is faced with the hit-and-run murder of Mark Blackwell, a freshly-released convict who the judge had previously sentenced to prison for murder. It turns out that Hank may be the only one capable of defending his father against the prosecution's experienced lawyer.

In the process, Hank discovers that his father has been diagnosed with terminal cancer and is undergoing chemotherapy. And then, of course, most movies feel the need to include a romantic element which, in this case, comes in the form of Hank's former girlfriend.

While 'The Judge' primarily tells about a fragmented family that bonds with each other over a legal case, it also contains various subplots that drag the movie. Apart from the extended time that I feel could have been avoided, I would add 'The Judge' to my must-watch list! The father-son duo played by Downey and Duvall is electric and is sure to leave a long-lasting impression on a legal drama fan.

Source: Amazon



# CRIME RIDDLES

FOR THE DETECTIVE IN YOU

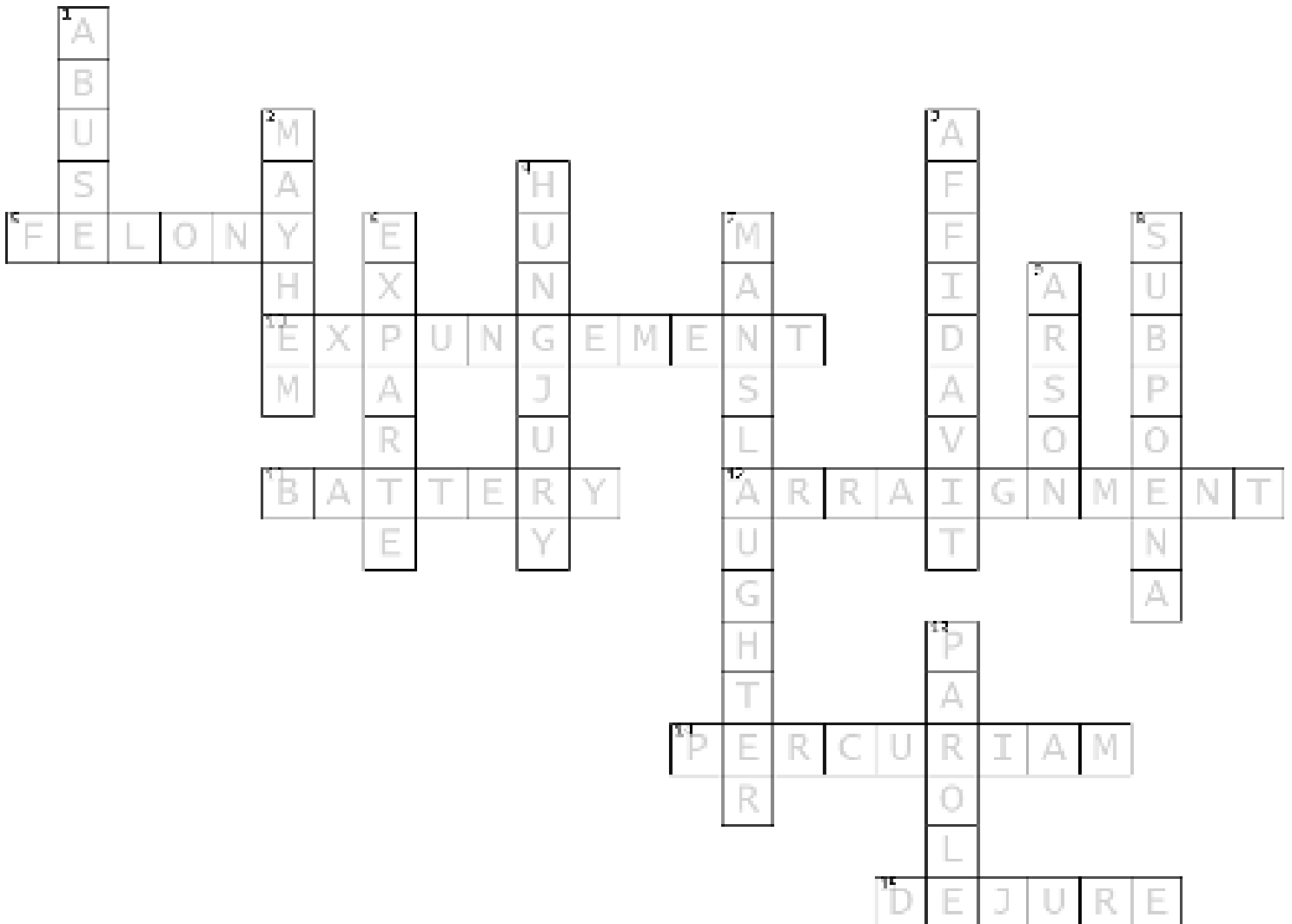
A young lady lived alone in a huge mansion. On Friday, when her best friend went to visit, she found her murdered by a stab wound. She immediately informed the police. When the police arrived at the mansion, they found some unopened fashion magazines, Tuesday's newspaper, stale milk and bread.

Ultimately, they manage to find the suspect. Who is the suspect?

Answer to the riddle will be shared in the next issue.

# ANSWERS

KNOW THE TERMS!  
LEGAL TERMINOLOGY CRISS- CROSS (Issue- 1)





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