

# V.S. DREAM COACHING

Indirapuram Ghaziabad

For  
H.J.S. P.C.S. (J) A.P.O. & CLAT

Year – 2024



Secret of success is to  
know something  
nobody else knows

**NO. 6 OF 2024**

**NEWSLETTER**

**June 2024**

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# V.S. DREAM COACHING

## 1. Study Material-Law

### New criminal laws come into effect on July 1

The new laws will bring in a modern justice system, incorporating provisions such as **Zero FIR**, online registration of police complaints, summonses through electronic modes such as SMS and mandatory videography of crime scenes for all heinous crimes.

Three new criminal laws will come into effect across the country from 01-07-2024, bringing widespread changes in India's criminal justice system and ending colonial-era laws.

The Bharatiya Nyaya Sanhita, Bharatiya Nagarik Suraksha Sanhita and the Bharatiya Sakshya Adhinyam will replace the British-era Indian Penal Code, Code of Criminal Procedure and the Indian Evidence Act, respectively.

**Union Home Minister Amit Shah**, who piloted the laws, said the new laws would give priority to providing justice, unlike the British-era laws that gave primacy to penal action.

"These laws are made by Indians, for Indians and by an Indian Parliament and marks the end of colonial criminal justice laws," he said.

Shah said the laws were not just about changing the nomenclature but bringing about a complete overhaul.

"**Soul, body and spirit**" of the new laws is Indian, he said.

Justice is an umbrella term that encompasses both the victim and the culprit, the home minister said and added these new laws would ensure political, economic and social justice with an Indian ethos.

According to the new laws, **judgment in criminal cases has to come within 45 days of completion of trial and charges must be framed within 60 days of first hearing.**

Statement of rape victims will be recorded by a female police officer in presence of her guardian or relative and medical reports have to come **within seven days**.

Organised crimes and acts of terrorism have been defined, sedition has been replaced with treason and video recording of all search and seizure have been made mandatory.

A new chapter on crimes against women and children have been added, buying and selling of any child has been made a heinous crime and there is a provision for death sentence or life imprisonment for gang rape of a minor.

The offences against women and children, murder and offences against the State have been given precedence in the new law.

Overlapping sections have been merged and simplified and will consist of only 358 sections against 511 in the Indian Penal Code, 1860.

For example, definitions scattered from sections 6 to 52 have been brought under one section. Eighteen sections already stand repealed and four relating to weights and measures are covered under the Legal Metrology Act, 2009.

Instances of false promise of marriage, gang rape of minors, mob lynching, chain snatching, etc are reported but the current Indian Penal Code did not have specific provisions for dealing with such incidents. These have been addressed in the Bharatiya Nyaya Sanhita, 2023.

A new provision has been made for cases such as abandonment of women after making sexual relations on the false promise of marriage.

The three laws were based on justice, transparency and fairness, the sources said. Under the new laws, a person can now report incidents by electronic communication, without the need to physically visit a police station. This allows for easier and quicker reporting, facilitating prompt action by the police.

With the introduction of **Zero FIR**, a person can file a First Information Report (FIR) at any police station, regardless of jurisdiction.

This eliminates delays in initiating legal proceedings and ensures immediate reporting of the offence.

An interesting addition of the law is that in the event of an arrest, the individual has the right to inform a person of his choice about his or her situation.

This will ensure immediate support and assistance to the arrested individual.

Besides, arrest details will now be prominently displayed within police stations and district headquarters, allowing families and friends of the arrested person easy access to important information.

To strengthen cases and investigations, it has become mandatory for forensic experts to visit crime scenes for serious offences and collect evidence.

Under the new laws, victims of crime against women are entitled to regular updates on the progress of their case **within 90 days**.

This provision keeps victims informed and involved in the legal process, enhancing transparency and trust.

The new laws guarantee free first-aid or medical treatment to victims of crimes against women and children at all hospitals.

This provision ensures immediate access to essential medical care, prioritising the wellbeing and recovery of victims during challenging times.

Summonses can now be served electronically, expediting legal processes, reducing paperwork and ensuring efficient communication among all parties involved.

For certain offences against woman, statements of the victim are to be recorded, as far as practicable, by a woman magistrate and, in her absence, by a male magistrate in the presence of a woman to ensure sensitivity and fairness, creating a supportive environment for victims.

**Both the accused and the victim are entitled to receive copies of the FIR, police report, charge sheet, statements, confessions, and other documents within 14 days.**

Courts grant a maximum of two adjournments to avoid unnecessary delays in case hearings, ensuring timely justice delivery.

The new laws mandate all state governments to implement witness protection schemes to ensure the safety and cooperation of witnesses, enhancing the credibility and effectiveness of legal proceedings.

The definition of "gender" now includes transgender individuals, promoting inclusivity and equality.

By conducting all legal proceedings electronically, the new laws offer convenience to victims, witnesses and accused, thereby streamlining and expediting the entire legal process.

To provide more protection to the victim and enforce transparency in investigation related to an offence of rape, the statement of the victim shall be recorded through audio-video means.

Women, persons **below 15 years, persons above 60 years** and those with disabilities or acute illnesses are exempt from attending police stations and can receive police assistance at their place of residence.

## **Individual Rights and Victim Justice in New Criminal Laws**

The Parliament has passed three new criminal law bills by a majority in the winter session. The Union Home Minister Amit Shah had introduced these three bills – 'Bhartiya Nyaya Sanhita 2023, Bhartiya Nagarik Suraksha Sanhita 2023, and Bhartiya Sakshya Adhinyam 2023' in both Houses of Parliament. After receiving the President's assent, these three bills have now become laws. With this, the country has now freed itself from the old criminal laws made during the era of British rule, or it can be said that the country has got a new criminal law by amending the old laws to suit the current time and changing circumstances.

This is an important subject overall. The conditions that existed in the country in 1860 have seen significant changes in both society and the law. When the independence movement was underway in the country, some stringent laws were enacted to suppress it. But when we adopted the Constitution, fundamental rights were granted to the people, such as freedom of expression and freedom of thought. Along with these changes, some new crimes have also emerged, such as terrorism, economic crimes, and cybercrimes. Therefore, the need was felt for new definitions and procedures in the laws. To expedite the justice process based on evidence, the need to consider electronic evidence was also felt. Furthermore, the laws of the British era were focused on controlling crime, not on providing justice. Therefore, it was necessary to keep in mind the individual's freedom and rights in the new laws.

Thus, over time, many important changes and amendments have become necessary in the laws. This is an ongoing process that needs to be constantly updated. Now, when we framed the Indian Penal Code, we used the term "**sedition**" instead of "**treason**". Because treason involved speaking against the state, but sedition did not involve speaking against the country. In this way, we made an important change. Similarly, terrorism is a new crime that we started seeing from the 1980s, but there was no provision for it in the laws of that time. Now we have included it as a new crime. Furthermore, new crimes such as mob lynching, economic offenses, child abduction, and acid attacks have also been included in the laws, as these did not exist earlier. In addition, cybercrimes and crimes occurring through new mediums like electronics have also been covered. So these important changes have been made in the laws. Moreover, now no person is considered guilty until proven so. This is an important change.

The main reason for all these changes is that society and its needs have changed over time, so it was necessary to change the laws as well. The Law Commission has often reformed laws, but what should be the principles based on which criminal laws should be reformed (principle-based criminal law reform)? The Indian Constitution was considered as the biggest source of these principles. 11

major principles were derived from the Constitution, and the first principle placed was the privacy of the individual. After the Constitution came into force, in Part 3 we gave rights to the individual. Individual rights are very important, and criminal law is a law that can violate individual rights, such as imprisoning a person. Whereas the Constitution says that individual liberty is supreme. How to strike a balance was a complex issue.

The second point is how to prioritize human rights. The third point is how to expedite justice, because the certainty of justice is very important. Earlier, the punishment could be severe but not certain. Certainty means that if it is written that this offense carries this punishment, then that punishment should be given within a definite time frame. Additionally, we saw that there were no laws for the victim. We had made laws keeping only offenders in mind. Now in the 21st century, a lot of work is being done on victimology. Victim justice is being talked about, so how to bring the victim to the centre stage? How can reforms happen in jails, and how can legal aid be provided?

If we have to give punishment, then what factors of the individual should we consider, such as mitigating factors and aggravating factors? There has been a lot of development in the social sciences and law, based on which we can better understand the offender and determine appropriate punishment for them. That is why there is also inclusion of community service in the laws. We have also talked about trial in absentia, that if a person is not available, they can still be prosecuted. How to make the police accountable, because earlier the police were only accountable to the governments, but now the issue of making the police accountable to the Constitution has come up. During the justice process, the victim has also been given rights.

In the Bhartiya Nyaya Sanhita 2023, the Honorable Home Minister has clearly stated that now we have also made a victim-centric law. For the first time in any law, victims' rights have been recognized. This is a new perspective. Although there is still a lot to be done, this is still a big step. We have also made many changes in the Evidence Act. We are also considering electronic evidence as primary evidence and can proceed based on it.

This process of reforms went on for around four years, and there was extensive discussion on it. During this time, many people expressed their views on various aspects. If you look at the initial draft, some people felt that the definitions needed to be made more comprehensive or more specific. Later, Parliamentary Standing Committee also suggested changes to it.

The most prominent example is terrorism. Earlier, terrorist activities were defined under the Unlawful Activities (Prevention) Act (UAPA), but that is a special law.

Terrorism was never brought into the Indian Penal Code (IPC) before. Bringing terrorism into the IPC means that there are many crimes happening in the country where we often need to mainstream the concept of terrorism. It has been divided into four parts:

- (1) if someone creates any kind of fear against an individual,
- (2) causes damage to public property,
- (3) causes harm to any critical infrastructure, and
- (4) endangers elected governments or creates fear of death.

This kind of definition has been taken from UAPA and incorporated into the IPC. Additionally, organized crime has been defined, it says that organized crime will be a form of continuing illegal activities such as kidnapping, robbery, vehicle theft, extortion, land grabbing, contract killing, etc. If these are done by a group involving threat, violence and unlawful activities, it will be considered organized crime. Mob lynching is a recent phenomenon, but due to lack of definition, it used to be registered as routine incidents. Now Section 101 says that if any incident involves a common intention on the basis of race, community, gender or birthplace, it will be included in the Indian Penal Code and provisions have been made for punishments up to life imprisonment and death penalty. In the previous IPC code, only males were mentioned, but now it includes men, women and transgender persons. Likewise, crimes against women and children have been included in a separate section. If someone has sexual intercourse through deception, that has also been made punishable. Deaths due to negligence (such as caused by driving) have also now been included. This was not viewed in this form earlier. Chain snatching has also been clearly defined. Earlier it was considered a form of theft, but now it has been made a separate offense with punishment up to 3 years.

The Indian Penal Code (IPC) lists various forms of punishment under Section 53, which include the death penalty, life imprisonment, fines, and confiscation of property, among others. However, the concept of community sentencing has never been accepted or explicitly disclosed. In the United Kingdom, community service has been incorporated into their procedural laws, which is a form of punishment. This is part of the reformatory approach, which means that instead of sending offenders to jail, they are made to perform some work for the community. As the problem of overcrowding in jails is increasing, community service could be an alternative to fines for minor offenses. For example, if a doctor is caught engaging in some wrongdoing, they could be asked to serve in a hospital for a few months. This is a good effort towards reforming the criminal justice system.

India has two types of laws - local and special. The local laws include certain specific crimes, while the special laws cover economic offenses. However, some

economic crimes such as money laundering or tax evasion already had existing laws. But it has been observed that there are also many common provisions, as the Indian Penal Code (IPC) is a general law and special laws are separate in the Indian legal system. In this context, some new provisions have been made which state that if a person is found guilty of an economic offense, their property can be confiscated. Additionally, the police have also been given certain powers to make arrests and file cases in such matters. Earlier, there were difficulties in accepting certain evidence as proof, but now evidence like smartphones and chats can also be accepted. The purpose of all these changes is to deal sternly with white-collar crimes and economic offenders, who earlier escaped due to lack of evidence.

Firstly, an FIR (First Information Report) should be registered within three days, which fall under the category of lesser offenses. And for offences that carry a punishment of three to seven years, it should be registered within 14 days. The investigation charge sheet should be completed within 90 days after the filing of the FIR. The magistrate should also take cognizance of the charge sheet within 14 days. Similarly, for first-time offenders, detinue can be released after one-third of the period. In the second case, the judgment should be delivered within 45 days of the hearing. And now existence of legally empowered Zero FIR, where a person can file an FIR at any police station, without the need to go to a specific jurisdiction. E-FIR can also be filed from home, especially for women. Many such things have happened that will bring certainty and speed to the justice process. This is a right to speedy justice, which is also given in the Constitution. It is a good step towards realizing the right to speedy justice under Article 21 of the Constitution.

In summary, the passage of these three new criminal law bills - Bhartiya Nyaya Sanhita 2023, Bhartiya Nagarik Suraksha Sanhita 2023, and Bhartiya Sakshya Adhinyam 2023, represents a significant milestone in India's legal history. By overhauling the outdated colonial-era criminal laws, the government has sought to align the country's justice system with the changing needs of modern society. Key principles such as the primacy of individual rights, expeditious justice, victim-centric approaches, and accountability have guided these reforms. The inclusion of emerging crimes like terrorism, cybercrime, and mob lynching, as well as a focus on mitigating factors in sentencing, showcase a more holistic and progressive criminal justice framework. While there is still room for further improvement, these reforms undoubtedly mark an important step towards a more equitable, rights-based criminal justice system in India.

**Delhi High Court stayed the trial court's order granting bail to  
Chief Minister Arvind Kejriwal in the excise policy case.**

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

% Reserved on: June 21, 2024  
Decided on: June 25, 2024  
+ **CRL.M.C 4858/2024**

**DIRECTORATE OF ENFORCEMENT**

..... Petitioner

Through: Mr. S. V. Raju, ASG with  
Mr. Zoheb Hossain, Special  
Counsel for ED along with  
Mr. Anam Venkatesh,  
Mr. Vivek Gurnani,  
Ms. Abhi Priya,  
Mr. Dipanshu Gaba,  
Ms. Shweta Desai,  
Ms. Bhanupriya, AD, Mr. S.  
K. Sharma, AD/IO and  
Mr. Gaurav Saini, ALA

Vs.

**ARVIND KEJRIWAL**

..... Respondent

Through: Dr. Abhishek Manu Singhvi,  
Senior Advocate with  
Mr. Vikram Chaudhari,  
Senior Advocate, Mr. Vivek  
Jain, Mohd Irshad,  
Mr. Karan Sharma,  
Mr. Rishikesh Kumar,  
Mr. Mohit Siwach,  
Mr. Sadiq Noor,  
Mr. Kaustubh Sandhu,  
Ms. Hargun Sandhu,  
Ms. Nikita Gill and  
Mr. Rajat Jain, Advocates

**CORAM - HON'BLE DR. JUSTICE SUDHIR KUMAR JAIN**

## ORDER

### CRL.M.A. 18446/2024 (stay)

1. The factual background of the case as appearing from the record is that CBI registered an FIR bearing no. RC-0032022A0053 dated 17.08.2022 against Sh. Manish Sisodia, Deputy Chief Minister, GNCTD and others under section 120 B read with section 477A of IPC, 1860 and section 7 of Prevention of Corruption Act, 1988 on the allegations of irregularities in framing and implementation of Excise Policy of GNCTD for the year 2021-22. Thereafter, the petitioner/Directorate of Enforcement (hereinafter referred to as "ED") recorded ECIR bearing no. ECIR/HIU-II/14/2022 on 22.08.2022 and initiated investigation to trace out proceeds of the crime stated to have been generated due to alleged irregularities in formulation and implementation of Excise Policy 2021-22. CBI filed the charge-sheet in predicate offence on 25.11.2022. ED filed the Prosecution Complaint on 26.11.2022 and the Special Court has taken the cognizance vide order dated 20.12.2022. ED subsequently also filed 06 supplementary charge-sheets and cognizance was taken by the Special Court on these supplementary charge sheets accordingly.

1.1 ED issued 9 summon to the respondent which were stated to be replied by the respondent but the respondent did not appear before ED in response to the summons. ED filed complaints under section 174 of Code of Criminal Procedure, 1973 (hereinafter referred to as "the Code") bearing no. CT 02/2024 dated 02.02.2024 and CT 04/2024 against the respondent on which the cognizance was taken vide order dated 07.02.2024 and 07.03.2024 respectively passed by the Special Judge, Rouse Avenue Courts, New Delhi. The respondent challenged the cognizance orders dated 07.02.2024 and 07.03.2024 but the concerned Special Court vide order dated 15.03.2024 declined to grant any interim relief to the respondent. The respondent on 19.03.2024 also filed a writ petition bearing W.P. (Crl) 937/2024 seeking quashing of summons under section 50 PMLA dated 26.02.2024 and 16.03.2024 and notice was issued by this Court for 22.04.2024. The respondent also filed an application bearing Crl. M. A. no 9106/2024 in W.P. (Crl) 937/2024 and the Division Bench of this Court did not grant any interim relief to the respondent on the said application vide order dated 21.03.2024.

1.2 ED arrested the respondent on 21.03.2024 at 9:05 PM under section 19 the Prevention of Money-Laundering Act, 2002 (hereinafter referred to as "PMLA") for the purpose of further investigation. The respondent being aggrieved by the arrest filed the writ petition bearing Diary No. 13598/2024 before the Hon'ble Supreme Court which was listed on 22.03.2024. The Hon'ble Supreme Court dismissed the said writ petition as withdrawn after giving liberty to the

respondent to raise all pleas and contentions before the trial court during the remand proceedings. The Special Judge vide order dated 22.03.2024 granted the custody of the respondent to ED for investigation till 28.03.2024 which was extended till 01.04.2024. The respondent was remanded to judicial custody on 01.04.2024 which is continuing up till date. 1.3 The respondent on 26.03.2024 preferred a writ petition bearing no. W.P. (Crl) 985/2024 to challenge his arrest on the ground of illegality and the remand order dated 22.03.2024 which was replied by ED. The writ petition bearing W.P. (Crl) 985/2024 was dismissed by Co-ordinate Bench of this Court vide judgment dated 09.04.2024. The respondent being aggrieved by the judgment dated 09.04.2024 filed SLP (Crl) bearing no 5154/2024 before the Hon'ble Supreme Court. The respondent was granted interim bail in SLP (Crl) 5154/2024 vide order dated 10.05.2024 till 01.06.2024 on the account of campaigning in the upcoming Lok Sabha general elections. The Hon'ble Supreme Court has already reserved judgment after conclusion of arguments in SLP (Crl) 5154/2024 vide order dated 17.05.2024.

1.4 The respondent on 30.05.2024 filed interim bail application vide IA no. 91/2024 and regular bail application vide IA no. 92/2024 before the Special Judge. The Special Judge has dismissed IA no 91/2024 for grant of interim bail vide order dated 05.06.2024. ED and the respondent have handed over written notes during the course of arguments on the bail application bearing IA no. 92/2024. The Court of Ms. Niyay Bindu, Vacation Judge, (PC Act), CBI-13, Rouse Avenue District Courts, New Delhi (hereinafter referred to as "the Vacation Judge") vide order dated 20.06.2024 (hereinafter referred to as "the Impugned Order") granted bail to the respondent.

1.5 ED being aggrieved by Impugned Order filed the present petition bearing Crl.M.C. no. 4858/2024 under section 439(2) read with section 482 of the Code to challenge the Impugned Order along with Crl.M.A. no. 18446/2024 with the prayer to grant ad interim ex parte stay of the operation of Impugned Order and said application is under disposal vide present order. The notice of Crl.M.C. no. 4858/2024 was ordered to be issued to the respondent which was accepted on behalf of the respondent and was ordered to be listed on 10.07.2024 before the Roaster Bench. This Court on 21.06.2024 heard the arguments at length on Crl.M.A. no. 18446/2024 and accordingly reserved the order and further till the pronouncement of the order on Crl.M.A. no. 18446/2024, the operation of the Impugned Order was stayed. The present order is restricted to disposal of Crl.M.A. no. 18446/2024.

2. ED in the present petition has challenged the Impugned Order primarily on the following grounds besides others:

i) The Vacation Judge has denied ED a proper opportunity to present its case which is utter violation of first mandatory condition as per section 45 of PMLA.

The oral prayer made on behalf of ED for seeking stay of the impugned order was also rejected by the Vacation Judge in utter disregard of settled precedents of law.

ii) The averments raised on behalf of the respondent before the Vacation Judge during the course of arguments have already been considered and rejected by another Co-ordinate Bench of this Court in judgment dated 09.04.2024. The Co-ordinate Bench of this Court in judgment dated 09.04.2024 has considered material collected by ED against the respondent, credibility of statements of witnesses and approver, validity of arrest of the respondent and remand order dated 22.03.2024, time of arrest of the respondent for not joining investigation despite issuance and service of 9 summons and no fresh material collected by ED since October, 2023, etc.

iii) There is evidence and material against the respondent to demonstrate that the respondent has committed offence of money laundering in his individual capacity and in his vicarious liability as per section 70(1) of PMLA and no court could have come to a reasonable ground to believe that he is not guilty of offence of money laundering.

iv) The respondent had active role in demanding kickback and meeting with south group. The respondent also had role in formulation of Excise Policy and utilization of proceed of crime amounting to Rs.45 crores approximately.

v) The statements recorded under section 50 of PMLA are admissible in nature and can be relied upon at the stage of remand or even to reject bail.

3. Sh. S.V. Raju, the learned Additional Solicitor General assisted by Sh. Zoheb Hossain, Special Counsel advanced arguments for ED. Dr. Abhishek Manu Singhvi and Sh. Vikram Chaudhari, the learned Senior Counsels advanced arguments on behalf of the respondent. ED and the respondent have also submitted a written note/submissions in terms of order dated 21.06.2024 which are perused and considered.

4. Before averting to the arguments, it is necessary to reproduce the relevant paragraphs of the Impugned Order which were also referred by learned Senior Counsels for both the parties during course of arguments. The para nos. 16, 20, 24, 25, 26, 27, 29, 31 and 33 are reproduced verbatim as under:-

16. Although, various bulky documents and citations have been filed by both the parties, most of which were not even relevant in respect of the present application

but it seems that both the parties have filed the same alongwith detailed oral arguments with the apprehension as to an order may be passed in favour of the opposite party. Admittedly, the present matter is a peculiar case wherein various accused, witnesses and stake holders are involved and neither ED nor the defense wants the order to be passed in favour of the other. However, it is not possible to go through these thousands of pages of the documents at this juncture but this is the duty of the court to work upon the matter whichever comes for consideration and pass the order in accordance with the law. Although, sometimes the courts refrain from passing such orders on account of various reasons which may be having long lasting effects. . . .

20. So far as the well settled principle of bail is concerned, several guidelines have been issued by the Hon'ble Supreme Court specifically in the celebrated judgment of Satender Kumar Antil Versus CBI & Anr. which have been enlightening the trial courts to a great extent and compliance of those guidelines have been ensured on State level as well on District level.

24. ED is taking plea that the investigation is still pending in this matter and there is a likelihood that the applicant may influence the witnesses and tamper with the evidence.

On oral enquiry by the court, the IO informed that out of the total alleged amount of 100 crores, around 40 crores has been traced out in the previous months and the remaining 60 crores yet to be traced. On this aspect, ED has failed to clarify as to how much time is required for tracing out the complete money trail. Meaning thereby that until and unless this exercise of tracing out the remaining amount gets completed by ED, accused is supposed to remain behind bars that too without proper evidence against him. This is also not an acceptable submission of ED.

25. ED is again and again pressing upon the twin conditions available under Section 45 of PMLA to fortify it's arguments that the aspect of bail under PMLA is altogether different from the provisions of bail under CrPC but one consideration is not being taken care of by ED that even for implicating a person as an accused in such a criminal matter is also required to be done under certain guidelines and legal procedures. Maxim of law that every person must be presumed innocent until proven guilty seems to be not applicable in the given case in respect of the present accused.

26. This is also noticeable that ED is silent about the facts as to how the proceeds of crime have been utilized in Assemble Elections at Goa by AAP as admittedly after about two years, the bigger portion of the alleged amount remains to be traced out.

27. There are certain undisputed facts as specified on behalf of the applicant that in the month of July 2022, the material was available with the ED against the accused but he was called only in August 2023 which shows malafide of ED and ED has failed to answer this objection of the applicant.

29. Ld. Counsel for the applicant states that statements of co-accused do not show any incriminating material against applicant. But, Ld. ASG stated that the statements of those co-accused/approvers is sufficient to establish the personal relation of the applicant with some of them and also the specific role and involvement of the applicant in the alleged offence. It may be possible that some known persons of the applicant are having involvement in an offence or being known to a third person, involved in the offence, but ED has failed to give any direct evidence against the applicant in respect of the proceeds of crime.

31. On the other hand, ED is silent of certain issues raised by the applicant such as that he was not named either in CBI case or in the ECIR FIR. Secondly, the allegations against the applicant have surfaced after the subsequent statements of certain coaccused. Thirdly, this is also an admitted fact that the accused has not been summoned by the court till date, yet, he is lying in the judicial custody at the instance of ED on the pretext of the investigation being still going on.

33. Interestingly, both the parties have relied upon the observations of Hon'ble Supreme Court as given in the celebrated case of Vijay Madanlal Chaudhary versus Union of India in respect of bail under Section 45 of PMLA. However, in view of the above discussion and on the prima facie basis, the guilt of the accused is yet to be established. In respect of the condition that he shall not involve in the offence after his release on bail, it is already undertaken so by the applicant in his application. Moreover, if bail is granted, the same shall be conditional which shall put the applicant under an obligation in this regard.

5. Sh. S.V. Raju argued that the Impugned Order is perverse as the Vacation Judge has not given an opportunity of being heard to ED to oppose the bail application filed by the respondent as per mandate of section 45(1)(i) of PMLA. The Vacation Judge has also not recorded its satisfaction that there are reasonable grounds to believe that the respondent has not committed offence of money laundering and is not likely to commit any offence while on bail as per section 45(1)(ii) of PMLA. Sh. S. V. Raju has referred para no. 16 of the Impugned Order.

5.1 Sh. S.V. Raju also argued that the Vacation Judge in para no. 27 of the Impugned Order has recorded wrong finding that the material was available with ED in the month of July, 2022 against the respondent who was called only in the month of August, 2023 which reflected mala fide of ED. It was also argued that

ECIR subject matter of the present petition was registered in the month of August, 2022. The respondent was arrested on 21.03.2024 and thereafter filed writ petition bearing W.P.(Crl) 985/2024 to challenge his arrest and remand and the Co-ordinate Bench of this Court in para no 155 of the judgment dated 09.04.2024 has already held that there was nothing before the Court to reach a conclusion that the timing of the arrest was deliberated by ED and the conduct of the respondent was not responsible for a situation in which there was no other option except to arrest him for joining the investigation.

5.2 Sh. S. V. Raju further argued that the respondent has filed SLP (Crl) 5154/2024 to impugn the judgment dated 09.04.2024 passed in W.P.(Crl) 985/2024 before the Hon'ble Supreme Court wherein the respondent vide order dated 10.05.2024 was granted interim bail. It was mentioned in order dated 10.05.2024 that nothing in the order shall be treated as an expression of opinion on the merits of the case of the Criminal Appeal pending before the Hon'ble Supreme Court. The Hon'ble Supreme Court on 17.05.2024 has already heard the arguments and the judgment is reserved. The Supreme Court vide order dated 17.05.2024 has given the liberty to the respondent to file an application for grant of bail which was ordered to be considered and decided in accordance with law. Sh. S. V. Raju also referred the order dated 10.11.2023 passed in SLP (Crl) no. 14510/2023 titled as Sanjay Singh V Union of India and another wherein the liberty was given to the petitioner Sanjay Singh to apply for grant of regular bail which if filed will be considered and decided on its merits without being influenced by the impugned judgment and accordingly it was argued that no such observation was made by the Hon'ble Supreme Court in order dated 17.05.2024 while giving the liberty to the respondent to file an application for grant of bail.

5.3 Sh. S. V. Raju also argued that the Impugned Order is perverse being passed on irrelevant consideration and by ignoring relevant consideration. The Vacation Judge in Impugned Order has taken the contrary view pertaining to the issues which have already been considered and decided vide judgment dated 09.04.2024 and said order has never been set aside or stayed by the Hon'ble Supreme Court. The findings as given in judgment dated 09.04.2024 were binding on the Vacation Judge. Sh. S. V. Raju also referred various paras of Impugned Order in particular para nos. 16, 27, 28, 29, 31, 32 and 33 to substantiate his arguments.

5.4 Sh. S. V. Raju further argued that the Vacation Judge has not considered vicarious liability of the respondent as per section 70(1) of the PMLA as the political party i.e. Aam Aadmi Party (AAP) was also found guilty of money laundering being the beneficiary of proceeds of crime generated in Delhi Liquor Scam. It was further argued that the proceeds of crime amounting to Rs.45 crores was utilized in the election campaign of AAP in Goa Assembly Election conducted in 2022. Accordingly, AAP has committed offence of money

laundering through respondent and the respondent is accordingly covered under section 70 of PMLA.

5.5 Sh. S.V. Raju argued that the bail can be cancelled if the court granting the bail have taken into consideration factors which should not have been taken into consideration or bail is founded on irrelevant consideration and referred *Neeru Yadav V State of U.P.*, (2014) 16 SCC 508. Accordingly, it was argued that the Impugned Order passed by the Vacation Judge be stayed till the final decision of the present petition.

5.6 ED in its written note has raised various issues for considerations and most of these issues/points were argued by Sh. S. V. Raju in oral submissions.

6. Dr. Abhishek Manu Singhvi, the learned Senior Counsel for the respondent argued that the respondent cannot be detained in jail indefinitely and the Vacation Judge was not expected to mention each and every argument stated to have been advanced on behalf of ED in impugned order. The judgment dated 09.04.2024 passed in W.P. (Crl) 985/2024 was not decided on merits of the case but only dealt with arrest of the respondent under section 19 of PMLA and referred para no. 4 of the judgment dated 09.04.2024 wherein it was observed by the learned Single Judge that the petition is not an application seeking grant of bail, but release on the ground of arrest of the respondent being illegal.

6.1 Dr. Singhvi further argued that the cancellation of bail and grant of bail are two different aspects and the Impugned Order is not perverse as the Vacation Judge has considered every aspect while passing the Impugned Order. If the present application is allowed, it would amount to cancellation of bail. Dr. Singhvi in support of his arguments cited ***Dolat Ram V State of Haryana, (1995) 1 SCC 349; Kanwar Singh Meena V State of Rajasthan, (2012) 12 SCC 180; Subhendu Mishra V Subhrat Kumar Mishra, 2000 SCC (Crl) 1580; Mahant Chand Nath Yogi V State of Haryana, (2003) 1 SCC 326 and Bhagirath Sinh V State of Gujarat, (1984) 1 SCC 284*** and also the judgments delivered by other benches of this Court.

6.2 Dr. Singhvi further argued that the Hon'ble Supreme Court in SLP (Crl) 5154/2024 titled as *Arvind Kejriwal V Directorate of Enforcement* vide order dated 10.05.2024 has granted leave to the respondent against the judgment dated 09.04.2024 passed in W.P.(Crl) 985/2024 and as such the judgment dated 09.04.2024 is under active consideration of the Hon'ble Supreme Court. Dr. Singhvi also referred para no. 15 of the order dated 10.05.2024 passed by the Hon'ble Supreme Court whereby the respondent was granted interim bail and order dated 17.05.2024 whereby liberty was granted to the respondent to file an application for grant of bail. Dr. Singhvi further stated that the judgment dated

09.04.2024 is not final and cannot be mixed with issue regarding the grant of bail to the respondent. The Vacation Judge was competent to decide the bail application independent of judgment dated 09.04.2024. 6.3 Dr. Singhvi while emphasizing that the personal liberty of a person is supreme mentioned that the respondent did not misuse interim bail granted for about 20 days by the Hon'ble Supreme Court vide order dated 10.05.2024. There cannot be any perversity if a different view is taken by the Vacation Judge while passing the Impugned Order. The respondent was not named as an accused either in RC registered by CBI or in ECIR registered by ED. Dr. Singhvi also referred the various paragraphs of impugned order. It was stated that no money trail could be traced qua the respondent as per section 3 of PMLA. Dr. Singhvi also referred law relating to section 45 of PMLA and in particular, Vijay Madan Lal Chaudhary V Union of India, 2022 SCC OnLine SC 929 and other judgments delivered by the Apex Court and prayed for dismissal of the stay application.

7. Sh. Vikram Chaudhari, the learned Senior Counsel also advanced arguments on behalf of the respondent and argued that the Vacation Judge gave findings on each argument advanced on behalf of the parties and stated that the Vacation Judge in first 15 pages of the Impugned Order has recorded the facts and arguments of the parties and also referred the para no. 15 of the order dated 10.05.2024 passed by the Hon'ble Supreme Court. It was also stated that no prejudice shall be caused if the respondent is released on bail and the Vacation Judge as reflecting from para no. 36 of the Impugned Order has considered most of the relevant arguments and contentions raised on behalf of the parties which were accordingly dealt with.

8. The written submissions were also submitted on behalf of the respondent. It is mentioned in written submissions that the co-accused P. Sarath Reddy (PSR) made his statement on 09.11.2022 under section 50 of PMLA wherein he did not say any incriminating fact against the respondent. The co-accused Magunta Sreenivasulu Reddy (MSR) made his statement on 24.03.2023 under section 50 of PMLA without mentioning any incriminating fact against the respondent. PSR was examined 9 times under section 50 of PMLA between his arrest and April, 2023 but he did not make any allegation against the respondent. However, PSR was granted pardon by the Special Judge on 29.05.2024 i.e. after 20 days from the grant of bail on 08.05.2024 by this Court as grant of bail was not objected by ED. ED issued 9 summon to the respondent but the respondent was not arrested till March, 2024.

8.1 In the written submissions besides arguments advanced by learned Senior Counsels for the respondent, it is also stated that issue pertaining to cancellation of bail is completely different from issue pertaining to grant or rejection of bail. ED is seeking cancellation of bail on the ground of perversity and not on the

ground of misuse of liberty, tampering of evidence, influencing the witnesses etc. The Impugned Order passed by the Vacation Judge is not only reasoned and passed on basis of contentions and arguments of the parties but is also reflective of application of judicial mind. The Vacation Judge in impugned order considered the relevant material which is contrary to arguments advanced on behalf of ED. ED was given sufficient opportunity by the Vacation Judge to advance arguments. The Vacation Judge also recorded finding that conduct of ED was mala fide. The Vacation Judge was not required to render finding on guilt or acquittal of the respondent but only to make a reasonable ground for believing that the respondent is not guilty on broad probabilities. The respondent in written submissions also stated other pleas and averments which have been argued by the learned Senior Counsels for the respondents.

9. This Court is conscious of the fact that this order pertains to disposal of stay application bearing no. 18446/2024 and the main petition has already been ordered to be listed before the Roster Bench on 10.07.2024 for consideration. It is pertinent to mention that substantial arguments advanced by both the parties and submissions as mentioned in written submissions/note are pertaining to main petition under section 439 (2) of the Code.

10. Sh. S. V. Raju opened the arguments by referring the para no. 16 of the Impugned Order wherein the Vacation Judge has observed that it is not possible to go through thousands of pages of documents filed by the respective parties but it is the duty of the court to work upon the matter whichever comes for consideration and passed the order in accordance with law. The Vacation Judge in para no. 36 of the Impugned Order as also referred by Dr. Singhvi observed that most of the relevant arguments and contentions raised on behalf of the parties are being dealt with in Impugned Order by the Vacation Judge. It is not understandable that on one hand, the Vacation Judge has expressed her inability to go through entire documents stated to have been running into thousands of pages at the time of passing the Impugned Order and on the other hand, how in para no. 36 the Vacation Judge has mentioned that relevant arguments and contentions raised on behalf of the parties are dealt with. The perusal of the Impugned Order is reflecting that the Vacation Judge has passed the Impugned Order without going through and appreciating the entire material brought on record by the rival parties which reflects perversity in Impugned Order. There is factual force in the arguments advanced by Sh. S. V. Raju that the Vacation Judge has not passed the Impugned Order after due consideration of entire material on record. Although, Sh. Vikram Chaudhari referred the para no. 36 of the Impugned Order but the averment made in para no. 36 of the Impugned Order does not inspire any confidence to the effect that the Vacation Judge before passing the Impugned Order has considered the entire material brought on record. The observation made by the Vacation Judge in Impugned Order is uncalled for,

unwarranted and out of context. The Vacation Judge should refrain from making such observations in the Impugned Order. The Vacation Judge was required to consider every important and relevant document at time of passing of Impugned Order.

10.1 The Vacation Judge in para nos. 1 to 6 has mentioned the contentions of the parties i.e. ED and the respondent and the arguments advanced by their respective counsels but the perusal of Impugned Order is reflecting that the Vacation Judge did not discussed and considered said contentions and the arguments in impugned order. It is also worth mentioning that ED submitted a written note in the concerned Special Court/Vacation Judge in support of the argument wherein the petitioner has raised various points as detailed therein for consideration but the Vacation Judge has not considered the said points/issues as mentioned in the written note submitted by ED before the Special Court/Vacation Judge.

11. Dr. Singhvi vehemently argued that the grant of bail and cancellation of bail are two different aspects and also cited various judgments in support of his arguments as referred hereinabove. It is accepted proposition of law that the rejection of the bail in a non- bailable case at initial stage and the cancellation of bail so granted have to be considered and dealt with on different basis and very cogent and overwhelming circumstances are necessary for an order directing the cancellation of bail already granted. Sh. S.V. Raju has argued that the relevant factors which should have been considered while dealing with the application for bail have not been taken note of or that the bail is founded on irrelevant consideration and in this eventuality, the superior court can set aside the order for grant of bail. Sh. S. V. Raju in support of his arguments as mentioned hereinabove cited *Neeru Yadav V State of Uttar Pradesh* (supra). However, the issue whether the present main petition under section 439(2) of the Code is maintainable or not maintainable has to be considered appropriately by the concerned Roster Bench while dealing with the main petition.

12. Sh. S.V. Raju while attacking the Impugned Order stated that the Vacation Judge has not given appropriate opportunity to ED to oppose the bail application as per section 45(1) of PMLA and the facts and circumstances leading to the denial of opportunity to ED as per the mandate of section 45(1) of PMLA are mentioned in the main petition under section 439(2) of the Code which requires due consideration by the court. Sh. Vikam Chaudhari in his argument after referring pages no. 1 to 15 of the Impugned Order has rebutted this argument of ED but in humble assessment of this court, argument raised by Sh. S. V. Raju needs due consideration of this court. Every court is under an obligation to give sufficient and appropriate opportunity to represent their respective case before the court. ED ought to have given adequate opportunity to advance arguments on bail application by the Vacation Judge.

13. The Vacation Judge in para no. 25 of the Impugned Order observed that ED has again and again pressed the twin conditions as per section 45 of PMLA which are stated to be altogether different from the provision of bail under the Code and further observed that due consideration is not being taken care by ED that even for implicating a person as an accused in such a criminal matter, it is also required to be done under certain guidelines and legal procedures. Sh. S.V. Raju argued that the trial court should have satisfied itself with the twin conditions as laid down under section 45 of PMLA but the Vacation Judge in the Impugned Order has not considered the twin conditions as per section 45 of PMLA. Dr. Singhvi has countered this argument by stating that the Vacation Judge in Impugned Order has considered correct proposition of section 45 of PMLA. It is correct that the Hon'ble Supreme Court in Vijay Madan Lal Choudhary V Union of India (supra) which is also referred by Dr. Singhvi has observed that at the stage of consideration of application for grant of bail, it is expected to consider the question from the angle as to whether the accused was possessed of the requisite mens rea and the court is not required to record a positive finding that the accused had not committed an offence under the Act. It was further observed that the Court ought to maintain a delegate balance between a judgment of acquittal and conviction and order granting bail much before commencement of trial. The Court is not supposed to weigh the evidence meticulously. However, the Vacation Judge in the Impugned Order has not discussed requirement of section 45 of PMLA while passing the Impugned Order. The trial court should have at least recorded its satisfaction about fulfillment of twin conditions of section 45 of PMLA before passing the impugned order.

14. Sh. S.V. Raju also referred the para no. 20 of the Impugned Order wherein the Vacation Judge observed that the Hon'ble Supreme Court in Satender Kumar Antil V CBI and Another, (2022) 10 SCC 51 also laid down several guidelines for grant of bail and argued that the law laid down in Satender Kumar Antil is applicable if the accused is not arrested during the investigation. It appears that the Vacation Judge has not discussed and appreciated Satender Kumar Antil in the right perspective.

15. Sh. S.V. Raju also referred the para no. 27 of the Impugned Order wherein the Vacation Judge observed that the material was available with ED against the respondent in the month of July, 2022 but the respondent was called in August, 2023 which reflected mala fide of ED and ED has failed to answer this objection of the respondent. Sh. S.V. Raju argued that the present ECIR was registered in the month of August, 2022 as such the said observation of the Vacation Judge is factually incorrect. Dr. Singhvi, however, countered the said argument by stating that there may be typographical error in para no. 27 of the Impugned Order and in place of July, 2022, it should have been read as July, 2023 and in place of August, 2023, it should have been read as October, 2023. Be as it may be, the

Vacation Judge observed that there was mala fide on the part of ED. It is worth mentioning here that the Co-ordinate Bench of this Court while delivering the judgment dated 09.04.2024 in W.P.(Crl) 985/2024, in para no. 151 observed absence of any mala fide intention on the part of ED and further observed that the Court has to examine the arrest and remand of the respondent irrespective of the timing of the elections. Dr. Singhvi although argued that the finding given vide judgment dated 09.04.2024 has not attained finality but this Court cannot lose sight of the fact that the Hon'ble Supreme Court while hearing SLP(Crl) 5154/2024 although granted the leave against the judgment dated 09.04.2024, but did not stay operation of judgment dated 09.04.2024. The Vacation Judge after following the judicial discipline should not have observe in para no. 27 of the Impugned Order that there was mala fide on the part of ED particularly in light of observation made in judgment dated 09.04.2024 as referred herein above.

16. Sh.S.V. Raju also argued that ED during the hearing of bail application subject matter of Impugned Order has raised issue of vicarious liability qua the respondent as per section 70 of PMLA but the said issue was not dealt by the Vacation Judge in the Impugned Order. The perusal of written note submitted by ED before the Special Judge/Vacation Judge reflects that the issue regarding the role of respondent for vicarious liability was taken by ED by mentioning that the role of the petitioner in vicarious liability was specifically examined and established after 30.10.2023 but said issue did not find any place in the Impugned Order.

17. Dr. Singhvi argued that that the personal liberty of a person is supreme and mentioned that the respondent did not misuse the interim bail granted for about 20 days. It is also stated in written submissions submitted on behalf of the respondent that Hon'ble Supreme Court vide order dated 10.05.2024 passed in SLP (Crl) 5154/2024 granted interim bail to the respondent after taking into consideration all objections of ED including objections/contentions raised in the present petition. The Hon'ble Supreme Court vide order dated 17.05.2024 also gave liberty to the respondent to file an application for grant of bail and said application if any, shall be considered and decided in accordance with law. Dr. Singhvi also argued that if present application is allowed it shall tantamount to cancellation of bail and further if the main petition under section 439 (2) of the Code is dismissed, the respondent can be again sent back to judicial custody.

17.1 The personal liberty as guaranteed under Article 21 of the Constitution cannot be deprived to a citizen except with the procedure established by law. The respondent was arrested on 21.03.2024 for further investigation when the respondent did not join investigation despite issuance of 9 summon. The respondent filed a petition bearing W.P. (Crl) no. 985/2024 to challenge arrest order dated 21.03.2024 and to declare consequential proceedings as illegal, non-

est, arbitrary and unconstitutional and custody remand being passed in a mechanical and patently routine manner. However, the petition bearing W.P. (CrI) no. 985/2024 was dismissed by the Co- ordinate Bench of this court vide judgment dated 09.04.2024. The respondent has filed SLP (CrI) 5154/2024 before the Hon'ble Supreme Court and leave was granted vide order dated 10.05.2024 and judgment has already been reserved after conclusion of arguments vide order dated 17.05.2024. It is worth mentioning that operation of the judgment dated 09.04.2024 was not stayed by the Hon'ble Supreme Court. So at this stage it cannot be said that arrest and remand of the respondent was not in accordance with law and personal liberty of the respondent was curtailed without following procedure established by law.

17.2 It is correct that the respondent was granted interim bail vide order dated 10.05.2024 which was emphatically referred by Dr. Singhvi passed in SLP (CrI) 5154/2024 by the Hon'ble Supreme Court. The Hon'ble Supreme Court in order dated 10.05.2024 observed that the respondent has not been convicted although serious accusations have been made against the respondent. It was further observed that the respondent does not have any criminal antecedents and the respondent is not a threat to the society. It was further observed that investigation is pending since August, 2022 and further legality and validity of arrest is under challenge before the Hon'ble Supreme Court. Accordingly, the respondent was granted interim bail till 01.06.2024 in background of the 18th Lok Sabha General Election on conditions as detailed in para no. 18 of the order dated 10.05.2024. Although, there is no allegation of misuse of interim bail by the respondent but one fact cannot be lose sight is that the respondent was not granted interim bail on merit but in background of 18th Lok Sabha General Elections. Accordingly, arguments advanced by Dr. Singhvi do not provide much help to the respondent. There is also no force in argument advanced by Dr. Singhvi that if the present petition under section 439 (2) of the Code is dismissed then the respondent can be again remanded to judicial custody particularly in view of the fact that Impugned Order passed by the Vacation Judge is under serious challenge and grounds of challenge as raised by ED requires consideration of concerned court.

18. Dr. Singhvi after referring para no. 24 of the Impugned Order stated that no recovery of proceeds of crime was traced to the respondent. The Vacation Judge in para no. 24 of the Impugned Order observed that ED has failed to clarify that how much time is required for tracing out the complete money trail particularly the remaining Rs.60 crores. It was further observed that unless and until the exercise of tracing out of remaining amount is completed by ED, the respondent cannot be supposed to remain behind bars without proper evidence against him. The perusal of the note submitted by ED before the Special Judge/Vacation Judge reflected that the said plea was encountered by ED but not sufficiently and adequately dealt with by the Vacation Judge in the Impugned Order.

19. The Vacation Judge in para no 31 of the Impugned Order observed that the respondent was neither named in RC filed by CBI nor in ECIR filed by ED and allegations against the respondent surfaced on account of subsequent statements of certain accused persons. The Vacation Judge also observed that the respondent is in custody at instance of ED on pretext of ongoing investigation despite he was not summoned by the court. Sh. S. V. Raju referred Pavana Dibbur V The Directorate of Enforcement, Criminal Appeal no. 2779/2023 decided on 29th November, 2023 wherein it was observed that it is not necessary that a person against whom the offence under section 3 of PMLA is alleged must have been shown as the accused in the scheduled offence. It was further observed that the conditions precedent for attracting the offence under section 3 of the PMLA are that there must be a scheduled offence and that there must be proceeds of crime. It was argued that observation of the Vacation Judge in Impugned Order is not legally tenable and as such Impugned Order is perverse. The argument as such advanced by Sh. S. V. Raju requires further consideration.

20. Sh. S.V. Raju also argued that the Impugned Order was passed on the basis of irrelevant consideration by ignoring relevant consideration. In the humble submission of this Court, these points are required to be considered by the Roster Bench at time of consideration of petition under section 439(2) of the Code.

21. The arguments advanced by Dr. Singhvi and Sh. Vikram Chaudhari that arrest of the respondent was bad, the judgment dated 09.04.2024 has not attained finality and other arguments which are not specifically dealt with or discussed in this order in humble opinion of this Court are required to be dealt with at the time of consideration of the petition under section 439(2) of the Code.

22. The Vacation Judge while passing the Impugned Order did not appropriately appreciate the material/documents submitted on record and pleas taken by ED and the averments/grounds as raised in the petition under section 439(2) of the Code require serious consideration while dealing with said petition. Accordingly, the present application is allowed and the operation of the Impugned Order is stayed.

23. It is made clear that nothing in this order shall be taken as any opinion or observation on the merits of the petition under section 439 (2) of the Code.

24. Copy of this order be given dasti to both parties under signature of the court master.

1. List on 10.07.2024 before the Roster Bench, as already fixed.

**DR. SUDHIR KUMAR JAIN**

**(VACATION JUDGE)**

**JUNE 25, 2024**

**Jharkhand High Court granted bail to former Chief  
Minister Hemant Soren in connection with an alleged land  
scam case**

**IN THE HIGH COURT OF JHARKHAND AT RANCHI  
B.A. No. 4892 of 2024**

**Sri Hemant Soren, S/o Sri Shibu Soren, R/o Kanke Road, P.S. & P.S.-  
Gonda, Ranchi ... .. Petitioner**

**Versus**

**Directorate of Enforcement, represented through its Assistant Director,  
Ranchi Zonal Office, Ranchi, Jharkhand ... .. Opposite Party**

**CORAM : HON'BLE MR. JUSTICE RONGON MUKHOPADHYAY**

**For the Petitioner :** Mr. Kapil Sibal, Sr. Adv.  
Miss Meenakshi Arora, Sr. Adv.  
Mr. Anurabh Chodhary, Sr. Adv.  
Miss Aprajita Jomowal, Adv.  
Mr. Abhir Datt, Adv.  
Mr. Piyush Chitresh, Adv.  
Mr. Shray Mishra, Adv.

**For the O.P-E.D :** Mr. S.V. Raju, Sr. Adv, ASGI Mr. Zoheb Hossain, Adv.  
Mr. Amit Kumar Das, Adv.  
Mr. Saurav Kumar, Adv.  
Mr. Rishabh Dubey, Adv.  
Mr. Shivan U. Sahay, Adv.  
Mr. Sankalp Goswami, Adv.

**C.A.V. on 13/06/2024**

**Pronounced on 28/06/2024**

Heard Mr. Kapil Sibal and Miss Meenakshi Arora, learned Senior Counsels for the petitioner and Mr. S.V. Raju, learned Additional Solicitor General of India for the Enforcement Directorate.

2. The petitioner seeks bail in this application as he is in custody in connection with ECIR Case No. 06/2023, arising out of ECIR/RNZO/25/2023 dated 26.06.2023, registered u/s 3 of the Prevention of Money Laundering Act, 2002 (herein after referred to as PMLA, 2002) punishable u/s 4 of PMLA, 2002

pending before the Court of Sri Rajiv Ranjan, learned Additional Judicial Commissioner-I-cum-Special Judge, PMLA, Ranchi.

3. A prosecution complaint under the PMLA, 2002 was instituted being ECIR Case No. 06/2023 against the present petitioner (Hemant Soren), Bhanu Pratap Prasad, Raj Kumar Pahan, Hilariyas Kachhap and Binod Singh and the background for sharing information u/s 66(2) of the PMLA, 2002 reveals that during investigation in another case being ECIR No. RNZO/18/2022 into the matter of fraudulent acquisition of land which was in possession of Ministry of Defence, Government of India, having area 4.45 acres at Morabadi, Ranchi it came to light that a group of private persons in connivance with government officials including the Ex-Deputy Commissioner, Ranchi, Chhavi Ranjan and Bhanu Pratap Prasad (Revenue Sub-Inspector, Circle Office, Baragain, Ranchi) were part of a land grabbing syndicate and was involved in corrupt practices which included acquiring properties on the basis of false deeds, falsification of Government records, tampering with original revenue documents etc. to facilitate private persons to acquire landed properties in a fraudulent manner. During investigation a survey was initially conducted at Circle Office, Baragain, Ranchi on 09.02.2023, in which, few original records kept in custody of Bhanu Pratap Prasad were verified and falsification and tampering in the registers were identified. It has been alleged that Bhanu Pratap Prasad was involved in corrupt practices and had been a party with several persons involved in acquisition of properties and on a raid conducted at several premises including the rented premises of Bhanu Pratap Prasad eleven trunks of voluminous property documents along with seventeen original registers (Register-II) were seized from his possession. Since the matter was related to forgery with the revenue records by a government official the information was shared with the Chief Secretary, Jharkhand and accordingly Sadar P.S. Case No. 272/2023 was registered on a written complaint of Manoj Kumar, Circle Officer, Baragain Anchal. It has been alleged that the registers contain reference to several properties which have been acquired in an illegal manner including the reference of properties measuring 8.86 acres at Shanti Nagar, Baragain, Bariatu Road (near Lalu Khatal) illegally acquired and possessed by the petitioner.

The prosecution complaint under the PMLA, 2002 further reveals that the seventeen registers seized from Bhanu Pratap Prasad were examined and explanation u/s 50 PLMA, 2002 was sought from Bhanu Pratap Prasad which further led to the identification of tampering in the said original records aimed at extending illegal benefits to other persons and during searches on 13.04.2023 in ECIR/RNZO/18/2022, handwritten diaries were also seized from the possession of other persons namely, Md. Saddam Hussain, Imtiaz Ahmad and others who were his associates. In the diaries cash payment to Bhanu Pratap Prasad was mentioned by his associates and in the cash transaction details in respect of

property measuring 4.83 acres situated at Plot Nos. 31, 32, 33, 35, 36, 38, 72 and 73, Khata No. 53, Mouza Gari, Baragain Anchal, Ranchi two false deeds, one of the year 1940 and the other of the year 1974 were prepared by the associates of Bhanu Pratap Prasad. It has been stated that the land measuring 4.83 acres is a portion of 37.10 acres of land which was purchased from Catholic Credit Cooperative Society by Mangal Mahto and Kaila Mahto in the year 1939 executed at the office of the District Sub-Registrar, Ranchi. It was revealed during investigation that the said properties are entered in Register-II at Page No. 53 of Volume-I of Gari Mouza. The land belongs to the Mahtos which cannot be sold or transferred to the persons belonging to the General Category. However, Bhanu Pratap Prasad in connivance with his accomplices entered the property measuring 4.83 acres in the name of Samrendra Chandra Ghoshal at Page no. 139 of Register-II, Volume-I. This page was earlier opened in the name of a raiyat, namely, Jitya Bhokta, Son of Tetar Bhokta. The name of Jitya Bhokta as well as Tetar Bhokta were encircled in red ink and the name of one Samrendra Chandra Ghoshal and Jitendra Chandra Ghoshal were written in place of Jitya Bhokta and Tetar Bhokta respectively thereby making this property as a general property which became saleable. On being confronted with the said facts Bhanu Pratap Prasad had admitted about his involvement in his statement recorded u/s 50 PMLA, 2002. The Circle Officer, Baragain was requested to provide a fresh certified copy of the concerned page but he, vide letter dated 19.03.2024, informed that the said page was torn and destroyed by someone, hence, the same is not available. It was therefore, implied that the records and evidence associated with the forgery committed by Bhanu Pratap Prasad and others are being destroyed and there are other persons involved who is/are acting on behalf of Bhanu Pratap Prasad and others. It has been alleged that Bhanu Pratap Prasad was a member of a syndicate which was involved in acquiring lands by fraudulent means which included tampering with original government registers, falsification of government records and manufacturing false documents. The accused Bhanu Pratap Prasad was directly involved in hatching conspiracies with other persons to acquire and dispose properties in illegal manner and was an accomplice to several persons including Hemant Soren which is corroborated from the seizure of an image recovered from his mobile phone which contains the details of a cluster of landed properties situated adjacently on twelve plots at Baragain Anchal, the total area of which is around 8.86 acres. The property was acquired in an illegal and unauthorized manner by the accused Hemant Soren and he had been in continuous possession of the property since 2010-11. In course of investigation, searches were conducted u/s 17 PMLA, 2002 and during search on 29.01.2024 cash amounting to Rs. 36,34,500/-, one BMW Car along with certain documents/records were seized from the premises under the use and occupation of the accused Hemant Soren. It has been alleged that in the first survey conducted on 20.04.2023 u/s 16 of the PMLA, 2002 in respect of 8.86 acres of land which was done in presence of the Circle Officer, Circle Inspector, Circle

Aamin, Baijnath Munda, Shyam Lal Pahan, Bhanu Pratap Prasad and the officials of the Directorate of Enforcement, Ranchi Zonal Office, it was seen that there was a big chunk of land bounded by stone walls with a temporary settlement in which a family consisting of five persons were residing and on inquiry about the ownership of the land one lady (name withheld) residing and available there stated that the owner of the said 8.86 acres of the land is the accused Hemant Soren. In course of inquiry one Santosh Munda had stated that the land belongs to Mantri Ji i.e. the accused herein. On further inquiry Santosh Munda had stated that the land is in custody of Hemant Soren, the then Chief Minister of Jharkhand which was noted by all persons present during the survey proceedings by putting their signatures on the paper drawn for that purpose. In the second survey conducted on 10.02.2024, the land measuring 8.86 acres was confirmed by the officials of the Circle Office present there that the said land is situated in the locality of Lalu Khatal. An image of a plan of a Banquet Hall was retrieved from the mobile phone of Binod Singh, a close accomplice of Hemant Soren, in which, the locality of the proposed construction of a Banquet Hall was mentioned as "Lalu Khatal, Bariatu Road, Ranchi". It was also checked during the survey that no other big parcel of land was vacant in the vicinity where the proposed Banquet Hall could be constructed. Some people were seen living in a settlement inside the boundary wall who identified themselves as family members of Santosh Munda but they could not identify accused Raj Kumar Pahan who claimed possession and occupation over the said land occupied by Hemant Soren. They had stated that they have been living in the said land for several years but they have never come across anyone called Raj Kumar Pahan. During survey, an "Indotech" made Electric Meter connection was seen in the room situated inside the boundary wall and in the Meter the name of "Hilariyas Kachhap, Diwakar Nagar, Bariatu Sadar" was written. The name of the accused Hilariyas Kachhap also surfaced during investigation where the witnesses have stated under Section 50 PMLA, 2002 that he used to be personally involved in the verification work done by Bhanu Pratap Prasad. Further he was also instructed in construction of boundary wall over the 8.86 acres of land by the accused Hemant Soren. It has also come in course of investigation that after the first summons were issued to the accused Hemant Soren an application was immediately filed by Raj Kumar Pahan, an accomplice of Hemant Soren before the Deputy Commissioner, Ranchi which was registered as SAR Case No. 81/2023-24 and vide order dated 29.01.2024 the SAR Court had cancelled the jamabandis of the earlier occupants thereby enabling the accused Raj Kumar Pahan to acquire the property on paper in order to distance Hemant Soren from the illegal occupation and possession of the subject property. The entire exercise by the SAR Court proves that the accused Hemant Soren misused his position and created parallel false evidence in order to camouflage his possession on the property and to project the said property i.e. the "proceeds of crime" as untainted property.

4. It has been submitted by Mr. Kapil Sibal, learned Senior Counsel for the petitioner that the allegation against the petitioner of money laundering is not made out on consideration of the broad probabilities of the case. The possession of the petitioner, either actual or constructive, on the subject property is not made out. It has been submitted that forcible possession of a property is not a scheduled offence. Possession by itself is not a criminal act. The persons who have stated about forcible possession have not disclosed the date and time of such possession. The alleged "proceeds of crime" which is the subject property was said to have been forcibly occupied and possessed by the petitioner since 2009-10 as per the Enforcement Directorate and it is the case of the prosecuting agency that its timely intervention prevented illegal acquisition by forging and fabricating documents. Mr. Sibal has submitted that the Enforcement Directorate cannot investigate a predicate offence and while referring to Section 2 (1)(u) of PMLA, 2002, it has been stressed upon that the said provision is with respect to a criminal activity relating to a schedule offence but in the present case there is no schedule offence and, therefore, no case of money laundering. Similar is the situation and the conclusion with respect to Section 3 of PMLA, 2002 as the same is also connected with the "proceeds of crime". Even if it is assumed that the land has been in the possession of the petitioner the same would not conclusively prove that it is on account of "proceeds of crime". There is no document which would be indicative of the fact that the property measuring 8.86 acres has been transferred in the name of the petitioner or any of his family members and there is no material, either tangible or intangible, to draw an inference regarding acquisition, possession or ownership of the petitioner over the said property. None of the documents found in the possession of Bhanu Pratap Prasad, Circle Inspector would be suggestive in any way about the involvement of the petitioner. If the petitioner had resorted to forcible dispossession as alleged the sufferer(s) could have easily preferred a complaint before the Court even if the Police had desisted from entertaining a report. The filing of an application u/s 71 A of the Chotanagpur Tenancy Act by Raj Kumar Pahan for restoration of the land in question in SAR Case No. 81/2023-24 and the same having been allowed establishes the ownership of Raj Kumar Pahan and others over the subject property and this in fact demolishes the case of the Enforcement Directorate against the petitioner. Mr. Sibal, learned Senior Counsel has referred to the supplementary affidavit filed by the petitioner which encloses the proceeding dated 20.04.2023 prepared by the Enforcement Directorate which has termed the claims of Baijnath Munda and Shyam Lal Pahan over the property in question as disputed and the matter appears to be civil in nature since the original owners have several descendants and settlement of such issue is beyond the purview of the PMLA, 2002. Mr. Sibal, in context of the order dated 29.01.2024, passed in SAR Case No. 81/2023- 24 has submitted that the said order has attained finality in absence of any challenge mounted to it and the frailties, if any, in the said order could surely have been considered by a higher forum prescribed under the

statute and having a doubt over the said order only on account of its being passed expeditiously would not be sufficient to make it redundant. He has in support of such stand referred to the case of "State of Punjab & Others versus Gurdev Singh" reported in (1991) 4 SCC 1, which reads thus:

"8. But nonetheless the impugned dismissal order has at least a de facto operation unless and until it is declared to be void or nullity by a competent body or court. In *Smith v. East Elloe Rural District Council* [1956 AC 736, 769 : (1956) 1 All ER 855, 871] Lord Radcliffe observed: (All ER p.

871) "An order, even if not made in good faith, is still an act capable of legal consequences. It bears no brand of invalidity on its forehead. Unless the necessary proceedings are taken at law to establish the cause of invalidity and to get it quashed or otherwise upset, it will remain as effective for its ostensible purpose as the most impeccable of orders."

9. Apropos to this principle, Prof. Wade states [ See Wade: Administrative Law, 6th edn., p. 352] :

"the principle must be equally true even where the „brand“ of invalidity" is plainly visible; for there also the order can effectively be resisted in law only by obtaining the decision of the court. Prof. Wade sums up these principles: [ Ibid.] "The truth of the matter is that the court will invalidate an order only if the right remedy is sought by the right person in the right proceedings and circumstances. The order may be hypothetically a nullity, but the court may refuse to quash it because of the plaintiff's lack of standing, because he does not deserve a discretionary remedy, because he has waived his rights, or for some other legal reason. In any such case the „void“ order remains effective and is, in reality, valid. It follows that an order may be void for one purpose and valid for another; and that it may be void against one person but valid against another."

10. It will be clear from these principles, the party aggrieved by the invalidity of the order has to approach the court for relief of declaration that the order against him is inoperative and not binding upon him. He must approach the court within the prescribed period of limitation. If the statutory time limit expires the court cannot give the declaration sought for."

5. The fact that Raj Kumar Pahan is the owner of the land and continues to remain in possession is borne out from the registered lease deed dated 16.12.2015 between Raj Kumar Pahan and Hilerious Kachhap and the installation of Electric Meter is in the name of Hilerious Kachhap and not the petitioner. Mr. Sibal has also referred to the Lease Agreement dated 21.12.2011 entered into between Chandrika Pahan and others with Ranjit Singh and the same does not identify the petitioner with the property of 8.86 acres. The Lease Agreement dated

16.12.2015 would further amplify the ownership of Raj Kumar Pahan over the land when considered in the backdrop of the order passed by the SAR Court u/s 71 A of the CNT Act which has already attained finality.

6. Learned Senior Counsel for the petitioner while taking the Court through the prosecution complaint has pointedly referred to paras 10.34, 10.40 and 10.51, which once again deals extensively with the order passed in SAR Case No. 81/2023-24 u/s 71 A of the CNT Act and the unprecedented haste with which the said case was dealt with in order to shield the petitioner with a conclusion that Raj Kumar Pahan and his family members did not have possession over the 8.86 acres of land and this finding has been countered to the effect that the authority under the PMLA, 2002 is not an adjudicating authority and, therefore, precluded from deciding these issues.

7. Mr. Kapil Sibal, learned Senior Counsel has also drawn the attention of the Court to para 10.51 of the prosecution complaint while questioning the finding that 8.86 acres of land is a "proceeds of crime" which has been acquired deceitfully by the petitioner and his family members during the period 2009-10 and is presently in his possession which has not only been illegally acquired and possessed but is also being used by the petitioner. Such finding, according to Mr. Sibal, is not based on any concrete evidence and such ambiguous conclusion would not act as a deterrent in the quest of the petitioner seeking bail. Learned Senior Counsel has refuted the charge of acquisition of 8.86 acres of land by the petitioner while submitting that the contours of the case do not at all suggest acquisition and at best even if a case of forcible possession is made out the same would not be a scheduled offence thus decimating the charge under the provision of PMLA, 2002. The issue of concealment by the petitioner pales into insignificance when the names of the owners of the land have already been entered into Register-II.

8. It has been submitted that in absence of any presumption of guilt for the predicate offence the Court must consider all reasonable grounds to believe that the petitioner is not guilty under the PMLA, 2002 and, in such context; reference has been made to the case of "Thomas Daniel versus Enforcement Directorate" reported in 2023 SCC Online Ker. 8214. It has been submitted by Mr. Sibal while referring to the case of "Sanjay Pandey versus Directorate of Enforcement"

reported in 2022 SCC Online Del 4279 that none of the ingredients of a scheduled offence are prima facie attracted in the case of the petitioner hence the provisions of PMLA, 2002 will not be applicable. The scheduled offences in the instant case are u/s 420, 467 and 471 IPC. The petitioner is not an accused in the predicate offence being Sadar P.S. Case No. 272/2023. It has been submitted that the primary allegations in the scheduled offence are with respect to forging of

documents and revenue records and that there is no allegation against the petitioner that he has forged any document and hence no offence u/s 468/471 IPC is made out. It has also nowhere been alleged that the petitioner had fraudulently induced any person to deliver any property and hence prima facie the offence of cheating cannot also be sustained against the petitioner. The ingredients u/s 464 IPC are also not fulfilled as there is no allegation that the petitioner had created any false document. In fact, it is the consistent case of the Enforcement Directorate that its timely action has prevented tampering and/or manipulations and, consequently transfer of the property to the petitioner. In absence of any predicate offence the property in question cannot be said to be the "proceeds of crime". Mr. Sibal learned Senior Counsel in reference to his aforesaid contention has relied upon the case of "Vijay Madanlal Choudhary & Others versus Union of India"

reported in 2022 SCC Online SC 929, wherein it has been held that any property can be termed as "proceeds of crime" u/s 2 (1)(u) of PMLA, 2002 only when it can be shown to have been derived from the scheduled offences.

9. Reverting back to the nature of the land in question it has been submitted that the same is a "Bhuinhari" land which cannot be sold or transferred u/s 48 of the CNT Act which imposes a complete restriction on transfer of "Bhuinhari Tenure Land". As per the records the land belongs to the "Pahan family" which fact has been reinforced by virtue of the order dated 29.01.2024 passed in SAR Case No. 81/2023-24 in terms of Section 71 A of the CNT Act. Since the possession of Raj Kumar Pahan and Others have been restored which continues to operate and is binding on all authorities the entire case of the Enforcement Directorate of the involvement of the petitioner in a case of money laundering gets obliterated. The statements recorded u/s 50 PMLA, 2002 cannot overwhelm the finding recorded by the quasi judicial authority.

10. Mr. Sibal, in course of his submission has pointedly referred to certain paragraphs of the prosecution complaint suggesting that forgery and interpolation of some documents recovered have been activated by the prosecuting agency itself. Certain files were purportedly recovered which contained a sticky note mentioning "CMO Pintu Urgent" and "CM Baragain Bhuinhari" and these were added by the Enforcement Directorate to falsely implicate the petitioner.

Some discrepancies have also been pointed out by Mr. Sibal from the prosecution complaint itself which according to him buttresses his contention regarding manipulation made in the files by the Enforcement Directorate.

11. The reliability and probative value of the statements recorded u/s 50 PMLA, 2002 are to be tested during trial and cannot be used to deny bail to an accused

and in support of such contention reliance has been placed in the case of "Chandra Prakash Khandelwal versus Directorate of Enforcement" reported in 2023 SCC Online Del 1094 and "Sanjay Jain versus Enforcement Directorate" reported in 2024 SCC Online Del 1656. Assumptions seem to have, according to the learned Senior Counsel, assumed considerable importance in the prosecution complaint which can easily be deciphered from a perusal of the same.

12. With respect to recovery of a BMW Car and cash amounting to Rs. 36,00,000/- approximately from the premises of Shanti Niketan, New Delhi it has been submitted that the same neither has any bearing to the scheduled offence nor the same has any nexus or is a derivative from a scheduled offence.

13. The twin conditions laid down u/s 45 PMLA, 2002 in the facts and circumstances of the case are fulfilled by the petitioner. It has been submitted that in the judgment passed in "Ranjitsing Brahmajeetsing Sharma versus State of Maharashtra & Another" reported in (2005) 5 SCC 294, in which the subject matter was under MCOCA wherein the provisions similar to Section 45 PMLA, 2002 had been interpreted and it was held that the Court is not required to arrive at a positive finding of not guilty and the accused has to disprove his guilt on the basis of broad probability. This has been followed in the case of "Vijay Madanlal Choudhary"

(supra) and in "Anil Vasant Rao Deshmukh versus State of Maharashtra" reported in (2022) SCC Online Bom. 3150. Mr. Sibal has also placed reliance in the case of "Mohd. Muslim versus State (NCT of Delhi)", reported in 2023 SCC Online SC

352.

14. Mr. S.V. Raju, learned Additional Solicitor General of India has opposed the prayer for bail of the petitioner and has given a brief background with respect to the application given on 04.05.2023 in terms of Section 66(2) of PMLA, 2002 and on receiving such communication the Circle Officer, Baragain, Ranchi had instituted a First Information Report wherein mention has been made of 17 volumes of Register-II having been found tampered. Several victims have come forward to submit their claims with supporting documents. Mr. Raju has brought to the notice of the Court the formal FIR and has submitted that Section 120B IPC was added and subsequently deleted in spite of the fact that conspiracy was mentioned therein. It has been submitted that the contention of the learned Senior Counsel for the petitioner that there is absence of any predicate offence is a misnomer and absurd. In course of investigation, it was detected that in several cases the nature of the land had been changed by manufacturing false and back dated deeds and in course of investigation handwritten notes/diaries and mobile phones containing incriminating evidences relating to properties acquired by

highly placed persons have been seized which were kept concealed by them. Mr. Raju has referred to the survey's conducted on 20.04.2023 and 10.02.2024 while submitting that they were not one sided surveys but surveys, in which, the concerned persons including government officials had participated and the land was found bounded which indicated that only one person was the owner i.e. Hemant Soren. Reference has been made to para 3.7 to 3.11 of the prosecution complaint which according to the learned Additional Solicitor General of India highlights the forgery committed in the government records. Elaborating his submissions, Mr. Raju has pointed out that during searches conducted on 13.04.2023 voluminous property documents and original registers were seized from the possession of Bhanu Pratap Prasad which were concealed and kept in his room. The properties were spread across different khatas and plots nos. and the property acquired and possessed by the petitioner are entered in three volumes i.e. Volume-I, Volume-IV and Volume-V which were kept by Bhanu Pratap Prasad at his premises. The registers themselves are properties as per the definition in Section 2 (1)(v) of the PMLA, 2002 as they were involved in the commission of the scheduled offence and as such any forgery/ criminality/tampering relatable to the said registers was within the ambit of investigation under PMLA, 2002. Bhanu Pratap Prasad was an accomplice of the petitioner and had played a pivotal role in providing assistance to the petitioner in acquiring "proceeds of crime" i.e. 8.86 acres of land. During analysis of the mobile seized from Bhanu Pratap Prasad the image recovered contained the details of the landed property situated adjacently on 12 plots at Baragain Anchal, total area of which was 8.86 acres. It has been submitted that a brown file was seized which had a sticky note, pasted on it, in which, "CM Baragain Bhuinhari" was written further corroborating the link of the property with the petitioner. In fact, Bhanu Pratap Prasad had admitted in his statement that the 8.86 acres of land belong to the petitioner. So far as the statement of the witness Hilariyas Kachhap u/s 50 PMLA, 2002 is concerned, he has stated that he used to be personally involved in the verification work done by Bhanu Pratap Prasad and he was instrumental in construction of boundary wall over the 8.86 acres of property of the petitioner. The statement of Hilariyas Kachhap gets corroborated by the statements of Manoj Kumar, Circle Officer, Baragain, Uday Shankar, PPS CMO and Abishek Prasad @ Pinto the press advisor of the petitioner and it gets co-related with the statement of Bhanu Pratap Prasad recorded at para 8.1 of the prosecution complaint. As per Manoj Kumar, Circle Officer Baragain, he had received directions from Uday Shankar, PPS CMO to get the property verified and that Hilariyas Kachhap looks after the said land measuring 8.86 acres on behalf of the petitioner. According to Mr. Raju, the link between the petitioner and his accomplices gets strengthened further in the statement of Uday Shankar, PPS, CMO that instruction to Manoj Kumar, Circle Officer, Baragain to verify the land was given by him on the direction of Abishek Kumar @ Pinto whose statement corroborates the said fact. The chain of events clearly categorizes the

involvement of the petitioner. He has referred to Section 110 of the Evidence Act in order to contend that the presumption would be drawn that the petitioner is the owner of 8.86 acres of land since the petitioner has failed to discharge his burden that he is not the owner. It has been submitted that the sticky note was already available in the file and was not deliberately put to implicate the petitioner. The witnesses to the seizure are persons of repute and they have also put their signature in the seizure memo. There cannot be any interpretation with respect to the seized documents since while recovering the same the lock on the room of Bhanu Pratap Prasad had to be broken by the Enforcement Directorate officials. The recovery of various documents/official records confers a deep connection of the land with the petitioner.

15. Mr. Raju, learned Additional Solicitor General of India has referred to an application submitted by Raj Kumar Pahan dated 16.08.2023 addressed to the Deputy Commissioner, Ranchi wherein he has sought for cancellation of the registered deed and to restore possession to him and the Plot numbers mentioned in the said letter co-relates with the property measuring 8.86 acres located near Lalu Khatal, Shanti Nagar, Baragain which is in the possession of the petitioner and this application filed by Raj Kumar Pahan was an apparent effort made by him to shield the petitioner. The application preferred by Raj Kumar Pahan was done immediately after the Enforcement Directorate had issued summons to the petitioner. Some related documents were also seized from the cupboard of the room of the petitioner at Delhi. This according to Mr. Raju would amplify the role of the petitioner in using the State machinery for his own benefit and to frustrate the investigation. Additionally, the haste with which SAR Case No. 81/2023-24 was disposed of is a pointer to the role played by the petitioner and the State machinery. Mr. Raju has further highlighted the fact that in the financial year 2023-24, 103 cases were filed before the SAR Court ; 102 cases have been filed online while SAR Case No. 81/2023-24 was filed offline and only 04 cases were disposed of including SAR Case No. 21/2023-24. The alacrity with which the case was disposed of speaks volumes of the undue influence actuated by the petitioner.

16. The twin grounds propounded by Mr. Kapil Sibal, learned Senior Counsel for the petitioner seeking grant of bail viz. (a) there is no predicate offence and, (b) forcible occupation is not a predicate offence have been sought to be nullified by Mr. Raju making reference to the order dated 03.05.2024 passed by a Division Bench of this Court in W.P.(Cr) No. 68 of 2024, wherein according to Mr. Raju an identical contention was raised when the arrest of the petitioner was challenged and all such issues were decided against the petitioner. He has extensively referred to the said order to support his submission. He has copiously referred to the petition filed before the Hon'ble Supreme Court by the petitioner against the order dated 03.05.2024 passed in W.P.(Cr) No. 68 of 2024

specifically with respect to the contents of Ground-D and Ground-K of the said petition. The consistent plea of the petitioner that at best it can be a case of forcible occupation and thus no case is made out under the PMLA, 2002 seems to have been stonewalled by virtue of the averments made in the said ground as "illegal acquisition" is the main contention of the petitioner which also is the case of the Enforcement Directorate. The acceptance of the fact that "Bhuinhari Land" is non-transferable under the CNT Act and that non-tribals had got their names wrongly mutated/entered in the revenue records during the period 1978-1986 is also palpable from the averments made in "Ground-K". It has been submitted that the grounds which have been propounded in the instant application for bail have already been extensively agitated before the Hon'ble Supreme Court in Special Leave to Appeal (Crl.) No. 6611/2024 which stood dismissed as withdrawn on 22.05.2024 and, therefore, such issues having been settled cannot be reagitated.

17. Mr. Raju, learned Additional Solicitor General of India has once again reverted back to the order dated 03.05.2024 passed by the Division Bench of this Court in W.P.(Cr) No. 68 of 2024 and with respect to the contention of Mr. Sibal in the said case as noted in para 19 that the Enforcement Directorate must show that there was a criminal conspiracy amongst the accused persons to commit one or other offences included in Part A, B, C of the Schedule reference has been made to the case of "Pavana Dibbur versus The Directorate of Enforcement" in Criminal Appeal No. 2779/2023. He has also referred to the following observation made in the said order, "In our opinion, any attempt to commit a schedule offence has to be made in Section 2 (1)(u) of the PMLA, 2002 as the expression „any criminal activity relating to a schedule offence' shall encompass an attempt to commit a schedule offence". In continuation to the aforesaid the further finding which has been recorded is as quoted herein, "it may so happen, as has happened in this case, that the property was first grabbed and then the attempt was made to make it lawfully acquired through illegal acts which shall constitute the schedule offence or an attempt to commit the schedule offence". Reference has also been made to the finding that the abundance of materials collected by the Enforcement Directorate prima facie shows the involvement of the petitioner with the "proceeds of crime" and "money laundering". In the present case, as per Mr. Raju a schedule offence was already committed by the petitioner. The finding of the Division Bench assumes considerable significance since the same has not been upset by the Hon'ble Supreme Court. Reliance has once again been placed on the findings of the Division Bench, which reads thus, "there is no goof ups in the EDs case and the statements made in the affidavit in opposition have to be read with reference to the documents appended therewith and the mere use of some inconsistent or contradicting expressions in the affidavit cannot be a ground to hold that the materials in possession of the ED were insufficient or that the Arresting Officer himself was confused". It has been submitted by Mr. Raju that the Division Bench had categorically held that at this

stage it is not possible to hold that the Enforcement Directorate has proceeded against the petitioner for no reasons. While referring to Section 19 PMLA, 2002 submission has been advanced that the Division Bench finding is categorical that sufficient materials are available indicating the guilt of the petitioner and the "reason to believe" in the backdrop of such finding gets substantiated. In fact, once the cognizance has been taken on 04.04.2024 the bar u/s 45 PMLA, 2002 kicks in thus disentitling the plea of the petitioner for grant of bail. The condition u/s 45 PMLA, 2002 with respect to propensity to commit an offence to dispel the plea of bail sought for is also demonstrated from the fact that the petitioner had instituted a criminal case against the Enforcement Directorate officials being SC/ST P.S. Case No. 06/2024. The conduct of the petitioner has further been highlighted to the effect that 10 opportunities were given to the petitioner to record his statement but he did not comply with 8 such opportunities and finally his statement was recorded initially at his residence on 20.01.2024 and again on 31.01.2024, on which date, he was arrested. The petitioner has misused the State machinery to subvert the investigation as would appear from the chronology of events demarcating the role of the petitioner in such acts. The provisional attachment order in terms of Section 9 PMLA, 2002 further intensifies the case of money laundering against the petitioner as the adjudicating authority has also accepted the said fact in its order dated 30.03.2024.

18. Mr. S.V. Raju, learned Additional Solicitor General of India has referred to various judgments in support of his numerous contentions advanced in opposition to the plea of bail of the petitioner. His contention of withdrawal of an application amounts to dismissal is anchored in the withdrawal of Special Leave to Appeal (Cr.) No. 6611/2024 before the Hon'ble Supreme Court which was against the order dated 03.05.2024 passed in W.P.(Cr.) No. 68/2024 and gets support from the case of "State of Gujarat versus Ashish B. Gandhi" reported in 1992 SCC Online Guj 152 and "Rajubhai Pithabhai Vala versus State of Gujarat" reported in 2011 SCC Online Guj 2872. Submission has been advanced that the provisions of PMLA, 2002 has a wide amplitude and covers any direct or indirect attempt to indulge or knowingly assist or being knowingly party or being actively involved in any process or activity connected with the "proceeds of crime". Support to the said contention is in the form of the judgment rendered in the case of "Vijay Madanal Choudhary & Others versus Union of India" reported in 2022 SCC Online SC 929, "Y. Balaji versus Karthik Desari and Another" reported in 2023 SCC Online SC 645 and "Anoop Bartaria & Etc. versus Deputy Director Enforcement Directorate & Another" in SLP (Cr.) No. 2397-2398/2019.

19. With respect to the twin conditions enshrined in Section 45 (1) PMLA, 2002 reference has been made to the case of "Vijay Madanal Choudhary versus Union of India"

(supra), "The Directorate of Enforcement versus M. Gopal Reddy & Anr." in SLP (CrI.) No. 8260/2021, "Tarun Kumar versus Assistant Director Directorate of Enforcement" reported in 2023 SCC Online 1486 and "Union of India versus Varinder Singh"

reported in (2018) 15 SCC 248.

20. "Vijay Madanlal Choudhary & Others versus Union of India" (supra) once again is the fulcrum of the submission made by Mr. Raju, learned ASGI, that statements u/s 50 PMLA, 2002 are admissible. According to him, this submission is further fortified by the judgment of Delhi High Court dated 06.04.2023 in the case of "Satyendra Kumar Jain versus Directorate of Enforcement" reported in 2023 SCC OnLine Del 1953, "Rohit Tandon versus Directorate of Enforcement" reported in 2018 11 SCC 46 and "Tarun Kumar versus Assistant Director Directorate of Enforcement" (supra) validates the said submission.

21. The Court at the stage of bail cannot get into the credibility and reliability of witnesses put up by the prosecution and the case of "Satish Jaggi versus State of Chhattisgarh" reported in (2007) 11 SCC 195, is a pointer to that aspect. "CBI versus V. Vijay Sai Reddy" reported in (2013) 7 SCC 452, has been referred to show case the submission that for grant of bail the legislature has used the words "reasonable grounds for believing" instead of "the evidence"

and that non-arrest/non-arraying of the co-accused is not a ground for bail to another accused.

22. Even statements u/s 161 Cr.P.C. are required to be considered while adjudicating upon a bail application and in support of such submission reference has been made to the case of "Salim Khan versus Sanjai Singh and Another"

reported in (2002) 9 SCC 670.

23. The offence of money laundering is an independent offence and a person accused of money laundering need not necessarily be an accused in the schedule offence. Once again reference has been made to the case of "Vijay Madanlal Choudhary & Others versus Union of India"

(supra) as well as "Dr. Manik Bhattacharya versus Ramesh Malik and Others" reported in 2022 SCC Online SC 1465 and "Pavana Dibbur versus The Directorate of Enforcement" (supra).

24. In serious economic offences delay cannot be the only ground to grant bail and Section 436A Cr.P.C. is a sufficient safeguard. Reference in this connection has been made to the case of "Religare Finvest Ltd. versus State of Nct of Delhi"

& Anr." of the Delhi High Court in CRL MC 796/221, "State of Bihar and Another versus Amit Kumar Alias Bachcha Rai" reported in (2017) 13 SCC 751 and "Satyendra Kumar Jain versus Directorate of Enforcement" in SLP (Crl.) No. 6561/2023.

25. To spruce up the submission that reason to believe does not include considering merits or demerits, Mr. Raju has referred to "Gurucharan Singh versus State (Delhi Admn.)" reported in (1978) 1 SCC 118, "Nimmagadda Prasad versus Central Bureau of Investigation" reported in (2013) 7 SCC 466, "Ranjitsing Brarhmajeetsing Sharma versus State of Maharashtra & Another" reported in (2005) 5 SCC 294, "Puran versus Rambilas and Another" reported in (2001) 6 SCC 338, "Lokesh Singh versus State of Uttar Pradesh and Another"

reported in (2008) 16 SCC 753, "Chaman Lal versus State of Uttar Pradesh and Anothe" reported in (2004) 7 SCC 525, "State of Maharashtra versus Sitaram Popat Vetal and Another"

reported in (2004) 7 SCC 521, "Dilawar Balu Kurane versus State of Maharashtra" reported in (2002) 2 SCC 135.

26. Mr. Raju, learned ASGI has referred to the case of "Directorate of Enforcement versus Aditya Tripathi" reported in 2023 SCC Online SC 619 to buttress his submission that the investigation in the schedule/predicate offence is an irrelevant consideration for the purposes of bail u/s 45 PMLA, 2002. Once cognizance has been taken the same implies that judicial mind has been applied to the fact that prima facie offence has been established and his submission according to Mr. Raju gains credence from the judgment rendered in the case of "Manharibhai Muljibhai Kakadia and Another versus Shailesbhbhai Mohnabhai Patel and Others" reported in (2012) 10 SCC 517.

27. Mr. Raju, learned ASGI based on his extensive submission has concluded that the dominant features of the case do not entitle the petitioner to the grant of bail and, therefore, this application deserves to be dismissed.

28. Miss Meenakshi Arora, learned Senior Counsel for the petitioner has sought to negate the submission of the learned ASGI by firstly referring to the order of the Division Bench dated 03.05.2024 in W.P.(Cr.) No. 68 of 2024 and submitting that Section 19 PMLA, 2002 and Section 45 PMLA, 2002 are intrinsically different as the said provisions are invoked and operate at different stages. She has submitted, in such context, that the prosecution complaint was filed by the Enforcement Directorate post the order passed in W.P.(Cr.) No. 68 of 2024 and it goes without saying that cognizance was taken at a later stage. This would be evident from the finding recorded by the Division Bench to the effect that "at this

juncture, a prosecution complaint is yet to be filed and the result of the investigation in Sadar P.S. Case No. 272 of 2023 is awaited". It has been submitted that the order in W.P.(Cr.) No. 68 of 2024 was delivered on 03.05.2024 and during the intervening period from the date of reserving the order and its deliverance the prosecution complaint was filed on 30.03.2024.

29. Miss Arora has submitted that the right to grant of bail to the petitioner cannot be subjugated by the order of the Division Bench as both operate in different fields. The observations made by the Division Bench that the provisions of PMLA, 2002 have to be interpreted, expanded and expounded whenever the need arises keeping in mind the object and purpose behind the legislature are not in the teeth of the judgment rendered by the Hon'ble Supreme Court in "Vijay Madanlal Choudhary & Others versus Union of India"

(supra) rather is contrary to the observations made therein.

30. It has been contended that the findings recorded at para 3.5 of the prosecution complaint regarding 4.83 of land speaks about the mutilation of the pages of Register-II but the same is with respect to a different piece of land not co-related to the subject matter of the prosecution complaint. Para 3.1 of the prosecution complaint relates to acquisition and possession of 8.86 acres of land by the petitioner but such allegations are farfetched and not backed up by any substantive evidence. It has been submitted that the starting point of the accusation is an image recovered from the mobile of Bhanu Pratap Prasad which contains the details of a cluster of landed properties at Baragain and while reading out the table which forms part of para 3.9 it has been sought to be impressed upon that though the names were entered during the period 1978 to 1989 but the name of the petitioner does not figure in the same. Miss Arora, learned Senior Counsel for the petitioner has reiterated the submission advanced by Mr. Kapil Sibal that it is the case of the Enforcement Directorate that timely action could prevent the illegal acquisition of properties by forging and fabricating government records. The documents were not in possession of the petitioner but in possession of Bhanu Pratap Prasad. This has been contradicted by the own finding of the Enforcement Directorate that the lands were illegally and fraudulent acquired and possessed by the petitioner. There was no forgery as the Enforcement Directorate itself has stated about foiling efforts to forge the document. Once again a vague assumption has been created on account of the presence of the Map/Plan of a Banquet Hall derived from the WhatsApp chat between Binod Singh and the petitioner. Continuous possession of the petitioner as assigned to the petitioner in para 10.29 of the prosecution complaint is also a misnomer and is scuttled in absence of any concrete evidence. The learned Senior Counsel has briefly taken the Court through the statements u/s 50 PMLA, 2002 and has submitted that the absence of any other evidence obscures the validity of

such statements. The Electric Meter was in the name of Hilariyas Kachhap and Raj Kumar Pahan had a registered document of the year 2015 and the purported acquisition and possession of the petitioner over the said land cannot be inferred. In fact, at the time, when the summons were issued to the petitioner he came to be informed in December, 2023 about the subject matter of the case. Referring to the case of "Rohit Tandon versus Directorate of Enforcement" (supra), it has been submitted that a formidable case was made out against the said accused but the test of formidability is absent in the case of the petitioner. This observation finds reflected in the case of "Tarun Kumar versus Assistant Director, Directorate of Enforcement" (supra) as well.

31. Miss Arora has referred to the supplementary prosecution complaint at para 9.11 which relates to a false deed prepared by Md. Saddam Hussain, Afsar Ali and others who were close accomplices of Bhanu Pratap Prasad and the same has been interpreted by the Enforcement Directorate to show possession of the petitioner over Plot Nos. 989 and 996. The acquisition of property in a fraudulent and concealed manner as at para 9.21 is an inconclusive proposition which does not establish any connection with the petitioner. The visual representation at para 9.24 does not complete the chain to establish its relatedness with the petitioner. It has been submitted that cognizance on the supplementary prosecution complaint has been taken on 13.06.2024. Learned Senior Counsel has also referred to the case of "Ranjitsing Brarhmajeetsing Sharma versus State of Maharashtra & Another" reported in (2005) 5 SCC 294 and "Tarsem Lal versus Directorate of Enforcement Jalandhar Zonal Office" reported in 2024 SCC Online SC 971. She has reiterated about the incarceration of the petitioner in custody which is since 31.01.2024.

32. I have heard the learned counsels for the respective sides and have also perused the affidavits filed including the prosecution complaint and the supplementary prosecution complaint.

33. Mr. Kapil Sibal, learned Senior Counsel for the petitioner has stated about absence of any predicate offence and, therefore, the provisions of PMLA, 2002 will not be applicable. A predicate offence or a schedule offence is defined in Section 2(1)(y) of the PMLA, 2002 which means (i) the offences specified under Part A of the Schedule; or (ii) the offences specified under Part B of the Schedule if the total value involved in such offence is One Crore Rupees or more; or

(iii) the offences prescribed under Part C of the Schedule. Section 3 of PMLA, 2002 reads as follows:

"3. Offence of money-laundering.--

Whosoever directly or indirectly attempts to indulge or knowingly assists or knowingly is a party or is actually involved in any process or activity connected with the [proceeds of crime including its concealment, possession, acquisition or use and projecting or claiming] it as untainted property shall be guilty of offence of money-laundering.

[Explanation.--For the removal of doubts, it is hereby clarified that,--

(i) a person shall be guilty of offence of money-laundering if such person is found to have directly or indirectly attempted to indulge or knowingly assisted or knowingly is a party or is actually involved in one or more of the following processes or activities connected with proceeds of crime, namely--

(a) concealment; or

(b) possession; or

(c) acquisition; or

(d) use; or

(e) projecting as untainted property; or

(f) claiming as untainted property, in any manner whatsoever;

(ii) the process or activity connected with proceeds of crime is a continuing activity and continues till such time a person is directly or indirectly enjoying the proceeds of crime by its concealment or possession or acquisition or use or projecting it as untainted property or claiming it as untainted property in any manner whatsoever.]"

34. Section 2 (1)(u) and Section 2 (1)(v) defines "Proceeds of Crime" and "Property" respectively and the same reads as under:

2. Definitions.--(1) In this Act, unless the context otherwise requires,-- .....

(u) "proceeds of crime" means any property derived or obtained, directly or indirectly, by any person as a result of criminal activity relating to a scheduled offence or the value of any such property [or where such property is taken or held outside the country, then the property equivalent in value held within the country] [or abroad];

[Explanation.--For the removal of doubts, it is hereby clarified that "proceeds of crime" include property not only derived or obtained from the scheduled offence but also any property which may directly or indirectly be derived or obtained as a result of any criminal activity relatable to the scheduled offence;]

(v) "property" means any property or assets of every description, whether corporeal or incorporeal, movable or immovable, tangible or intangible and includes deeds and instruments evidencing title to, or interest in, such property or assets, wherever located;

[Explanation.--For the removal of doubts, it is hereby clarified that the term "property"

includes property of any kind used in the commission of an offence under this Act or any of the scheduled offences;

35. In "Vijay Madanlal Choudhary & Others versus Union of India" (supra), it has been held as follows:

"253. Tersely put, it is only such property which is derived or obtained, directly or indirectly, as a result of criminal activity relating to a scheduled offence can be regarded as proceeds of crime. The authorities under the 2002 Act cannot resort to action against any person for money- laundering on an assumption that the property recovered by them must be proceeds of crime and that a scheduled offence has been committed, unless the same is registered with the jurisdictional police or pending inquiry by way of complaint before the competent forum. For, the expression "derived or obtained" is indicative of criminal activity relating to a scheduled offence already accomplished. Similarly, in the event the person named in the criminal activity relating to a scheduled offence is finally absolved by a court of competent jurisdiction owing to an order of discharge, acquittal or because of quashing of the criminal case (scheduled offence) against him/her, there can be no action for money- laundering against such a person or person claiming through him in relation to the property linked to the stated scheduled offence. This interpretation alone can be countenanced on the basis of the provisions of the 2002 Act, in particular section 2(1)(u) read with section 3. Taking any other view would be rewriting of these provisions and disregarding the express language of definition clause "proceeds of crime", as it obtains as of now.

269. From the bare language of section 3 of the 2002 Act, it is amply clear that the offence of money-laundering is an independent offence regarding the process or activity connected with the proceeds of crime which had been derived or obtained as a result of criminal activity relating to or in relation to a scheduled offence. The process or activity can be in any form--be it one of concealment, possession, acquisition, use of proceeds of crime as much as projecting it as untainted property or claiming it to be so. Thus, involvement in any one of such process or activity connected with the proceeds of crime would constitute offence of money-laundering. This offence otherwise has nothing to do with the criminal

activity relating to a scheduled offence--except the proceeds of crime derived or obtained as a result of that crime.

270. Needless to mention that such process or activity can be indulged in only after the property is derived or obtained as a result of criminal activity (a scheduled offence). It would be an offence of money- laundering to indulge in or to assist or being party to the process or activity connected with the proceeds of crime ; and such process or activity in a given fact situation may be a continuing offence, irrespective of the date and time of commission of the scheduled offence. In other words, the criminal activity may have been committed before the same had been notified as scheduled offence for the purpose of the 2002 Act, but if a person has indulged in or continues to indulge directly or indirectly in dealing with proceeds of crime, derived or obtained from such criminal activity even after it has been notified as scheduled offence, may be liable to be prosecuted for offence of money- laundering under the 2002 Act--for continuing to possess or conceal the proceeds of crime (fully or in part) or retaining possession thereof or uses it in trenches until fully exhausted. The offence of money-laundering is not dependent on or linked to the date on which the scheduled offence or if we may say so the predicate offence has been committed. The relevant date is the date on which the person indulges in the process or activity connected with such proceeds of crime. These ingredients are intrinsic in the original provision (section 3, as amended until 2013 and were in force till July 31, 2019) ; and the same has been merely explained and clarified by way of Explanation vide the Finance (No. 2) Act, 2019. Thus understood, inclusion of clause (ii) in Explanation inserted in 2019 is of no consequence as it does not alter or enlarge the scope of section 3 at all."

36. In "Pavana Dibbur versus the Directorate of Enforcement" (supra), the same view was taken as in "Vijay Madanlal Choudhary & Others versus Union of India"

which reads thus:

"18. In a given case, if the prosecution for the scheduled offence ends in the acquittal of all the accused or discharge of all the accused or the proceedings of the scheduled offence are quashed in its entirety, the scheduled offence will not exist, and therefore, no one can be prosecuted for the offence punishable under Section 3 of the PMLA as there will not be any proceeds of crime. Thus, in such a case, the accused against whom the complaint under Section 3 of the PMLA is filed will benefit from the scheduled offence ending by acquittal or discharge of all the accused. Similarly, he will get the benefit of quashing the proceedings of the scheduled offence. However, an accused in the PMLA case who comes into the picture after the scheduled offence is committed by assisting in the concealment or use of proceeds of crime need not be an accused in the

scheduled offence. Such an accused can still be prosecuted under PMLA so long as the scheduled offence exists. Thus, the second contention raised by the learned senior counsel appearing for the appellant on the ground that the appellant was not shown as an accused in the chargesheets filed in the scheduled offences deserves to be rejected."

37. In the present case it all started with the investigation into the fraudulent acquisition of land which was in possession of the Ministry of Defence, Government of India and this led to identifying some private persons in connivance with government officials which were part of a land grabbing syndicate and whose involvement ranged from falsification of government records to tampering with the original revenue records. Recoveries were effected from the premises of Bhanu Pratap Prasad, Revenue Sub Inspector, Circle Office, Baragain, Ranchi which included property documents and 17 original registers (Register-II). This led to registration of Sadar P.S. Case No. 272/23. The documents seized according to the Enforcement Directorate manifested in a trail designating the role of the petitioner in the illegal acquisition and possession of 8.86 acres of land situated at Shanti Nagar, Baragain, Bariatu Road (near Lalu Khatal). It is, therefore, the case of the Enforcement Directorate that the provisions of PMLA, 2002 would apply since the petitioner had derived or obtained property as a result of a scheduled offence and had indulged himself in an activity connected with the said property. The factual aspects of the case would negate the submission of the learned Senior Counsel for the petitioner that there has been no schedule offence and, therefore, no case of money laundering is made out. In fact, the same issue was raised by the petitioner in W.P.(Cr.) No. 68 of 2024 but the Division Bench had invalidated the said submission in the following manner:

"19. Mr. Kapil Sibal, the learned senior counsel submitted that the offence of conspiracy included in Part-A to the Schedule is not a standalone offence and to rope in the petitioner who is not an accused in Sadar PS Case No. 272 of 2023 with the aid of section 120-B of the Indian Penal Code, the ED must show that there was a criminal conspiracy among the accused persons to commit one or the other offences included in Parts A, B and C of the Schedule. It is contended that the petitioner not being accused of committing a scheduled offence and not connected with any proceeds of crime cannot be prosecuted. We do not find any substance in this submission. In a series of pronouncements, the Hon'ble Supreme Court held that it is not necessary that the person accused of the offence of money-laundering was made an accused in the First Information Report lodged for the commission of a predicate offence. A decision on the point is found in "Y. Balaji" 11 where the issue contested was whether mere registration of a First Information Report for a predicate offence which may be a scheduled offence is sufficient for the ED to register an ECIR and summon a person under

section 50 of the PMLA. On behalf of the accused, it was contended that unless the commission of the scheduled offence generated proceeds of crime which was laundered by someone the ED cannot issue summons under section 50(2) by registering an ECIR even before identifying some property as representing the proceeds of crime. The Hon'ble Supreme Court held that: "these contentions, in our opinion, if accepted, would amount to putting the cart before the horse. Unfortunately for the accused, this is not the scheme of the Act".

38. Since the order dated 03.05.2024 passed in W.P.(Cr.) No. 68 of 2024 has been extensively referred to by the learned Additional Solicitor General of India stressing primarily on the binding nature of the said order upon this Court particularly with respect to the findings recorded in each of the issues, the said order has been perused. The prayer in the writ application, varied though it is, can be summed up primarily to focus on the issuance of summons to the petitioner which according to the petitioner was illegal and in colourable exercise of power as well as vindictive and to declare the arrest and continued detention of the petitioner as unwarranted, arbitrary and violative of Article-21 of the Constitution of India. The fundamental issue was with respect to Section 19 PMLA, 2002. When W.P.(Cr.) No. 68 of 2024 was heard on 28.02.2024, the prosecution complaint was not filed by the Enforcement Directorate but the same was subsequently filed on 30.03.2024 and, cognizance was taken. Thus an entirely new scenario has emerged with the filing of the prosecution complaint and the supplementary prosecution complaint. The present case being an application of bail and operating in an entirely different sphere and in view of the changed circumstances noted above would not be shackled by the observations made in W.P.(Cr.) No. 68 of 2024.

39. The involvement of the petitioner as per the prosecuting agency is primarily through the angle of conspiracy though according to the Enforcement Directorate Section 120B was struck off in the formal FIR at the behest of the Police in spite of conspiracy playing a predominant role in the predicate offence which led to institution of Sadar P.S. Case No. 272 of 2023. The prelude to the entire episode culminating in submission of prosecution complaint and supplementary prosecution complaint by the Enforcement Directorate is the recovery of huge quantity of incriminating documents showing forgery, manipulation and tampering of government records and mutilation of government revenue records. It is the consistent case of the Enforcement Directorate that the petitioner had manoeuvred the State Agency while holding the post of Chief Minister of Jharkhand in acquisition and possession of 8.86 acres of land at Shanti Nagar, Baragain, Bariatu, Ranchi and the Investigating Agency has attempted to connect the dots criminating the petitioner with derivation of the said property which can be construed to be from "proceeds of crime". The image retrieved from the mobile phone of Bhanu Pratap Prasad revealed the details of a cluster of landed

property in Baragain Anchal totalling an area of 8.86 acres which was said to have been possessed by the petitioner since 2010-11. The plan of a Banquet Hall was retrieved from the mobile phone of Binod Singh who is a close accomplice of the petitioner and the location of the Baragain Banquet Hall co-relates with the existence of the property of 8.86 acres. Once the petitioner had got a whiff of the impending action of the Enforcement Directorate, he, in order to thwart such move had set up Raj Kumar Pahan whose filing of an application u/s 71A CNT Act for restoration registered as SAR Case No. 81/2023-24 culminated in an order passed in haste without following the requisite procedure thus circumventing the acquisition and possession of the land by the petitioner. A link between the petitioner and his accomplices have also sought to be established from the statement of Bhanu Pratap Prasad, Hilariyas Kachhap, Manoj Kumar, Uday Shankar and Abhishek Kumar @ Pintu.

40. At this juncture, it would be apt to refer to the statements recorded u/s 50 PMLA, 2002 which primarily concentrates on the purported acquisition and possession of 8.86 acres of land at Baragain by the petitioner. The statement of Bhanu Pratap Prasad was recorded on several occasions and without going into the details of such statements, what can be culled out is that on a verbal direction from Manoj Kumar, Circle Officer, Baragain he had verified the property having 8.86 acres and he as well as the Anchal Aamin had admitted that they had come to know that the land belonged to the present petitioner. It would evident from the statement of Bhanu Pratap Prasad that his involvement in forging and manipulation of government records had spread its tentacles to a wider spectrum and not particularly to only 8.86 acres of land which is the subject matter of the present case.

41. The statement of the petitioner seems to reveal complete denial of the allegation of acquisition and possession of 8.86 acres of land at Baragain. He had also denied of having any acquaintance with Bhanu Pratap Prasad. He had denied of having any knowledge about the retrieved image of a cluster of land recovered from the mobile of Bhanu Pratap Prasad. The petitioner was also confronted with the WhatsApp chat between him and Binod Singh which contained sharing of information and conversation in respect of various properties but he had given a false statement regarding these chats. The construction of a Banquet Hall proposed at Lalu Khatal, Baragain prepared by Grid Consultants and shared by Binod Singh on WhatsApp with the petitioner have also been met with an elusive reply by the petitioner. Inference has been drawn by the Enforcement Directorate that the Banquet Hall was meant to be constructed on the 8.86 acres of land of the petitioner since there was no other land of such proportion in the vicinity of Lalu Khatal, Bariatu. In the statement of Baijnath Munda it is revealed that the land in question was originally owned by his ancestors and was forcibly acquired by the

petitioner and Shibu Soren and the petitioner is in possession of the same since the year 2010.

42. The statement of Santosh Munda u/s 50 PMLA, 2002 divulges that he is the Caretaker of the land measuring 8.86 acres which has been acquired and possessed by the petitioner illegally and that he was earlier involved in the construction of the boundary wall after which he got the work of a Caretaker.

43. As per the statement of Manoj Kumar, Circle Officer, Baragain he had instructed Bhanu Pratap Prasad to inspect the property and furnish a report on the direction of Uday Shankar, PPS, CMO and as per Uday Shankar such direction was received by him from Abhishek Prasad @ Pinto the Press Advisor to the petitioner. The verification of the land according to Abhishek Prasad @ Pinto was on the instruction of the petitioner.

44. Since Section 50 PMLA, 2002 assumes considerable influence in the case of the Enforcement Directorate the same is quoted hereinunder:

"50. Powers of authorities regarding summons, production of documents and to give evidence, etc.--(1) The Director shall, for the purposes of Section 13, have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) while trying a suit in respect of the following matters, namely:--

(a) discovery and inspection;

(b) enforcing the attendance of any person, including any officer of a [reporting entity], and examining him on oath;

(c) compelling the production of records;

(d) receiving evidence on affidavits;

(e) issuing commissions for examination of witnesses and documents; and

(f) any other matter which may be prescribed. (2) The Director, Additional Director, Joint Director, Deputy Director or Assistant Director shall have power to summon any person whose attendance he considers necessary whether to give evidence or to produce any records during the course of any investigation or proceeding under this Act. (3) All the persons so summoned shall be bound to attend in person or through authorised agents, as such officer may direct, and shall be bound to state the truth upon any subject respecting which they are examined or make statements, and produce such documents as may be required.

(4) Every proceeding under sub-sections (2) and (3) shall be deemed to be a judicial proceeding within the meaning of Section 193 and Section 228 of the Indian Penal Code (45 of 1860).

(5) Subject to any rules made in this behalf by the Central Government, any officer referred to in sub-section (2) may impound and retain in his custody for such period, as he thinks fit, any records produced before him in any proceedings under this Act:

Provided that an Assistant Director or a Deputy Director shall not--

- (a) impound any records without recording his reasons for so doing; or
- (b) retain in his custody any such records for a period exceeding three months, without obtaining the previous approval of the [Joint Director]."

45. In "Vijay Madan Lal Choudhary versus Union of India" (supra), the validity of Section 50 PMLA, 2002 was under consideration and it has been held as follows:

"449. In other words, there is stark distinction between the scheme of the NDPS Act dealt with by this court in Tofan Singh (supra) and that in the provisions of the 2002 Act under consideration. Thus, it must follow that the authorities under the 2002 Act are not police officers. Ex-consequenti, the statements recorded by the authorities under the 2002 Act, of persons involved in the commission of the offence of money- laundering or the witnesses for the purposes of inquiry/investigation, cannot be hit by the vice of article 20(3) of the Constitution or for that matter, article 21 being procedure established by law. In a given case, whether the protection given to the accused who is being prosecuted for the offence of money-laundering, of section 25 of the Evidence Act is available or not, may have to be considered on case-to-case basis being rule of evidence."

46. In "Satyendra Kumar Jain versus Directorate of Enforcement" (supra), in Bail Application No. 3590/2022, CRL.M.A. 25088/2022, the Delhi High Court has held as follows:

"67. The statements made under Section 50 of the PMLA have been held to be an admissible piece of evidence. The term "admissible evidence"

means that such evidence can be considered by the court at the time of appreciation of evidence. A statement recorded under Section 161CrPC is not an admissible piece of evidence and can be used only for the limited purpose as provided under Section 162CrPC. But even in general crime cases, mostly at the stage of the bail during the stage of investigation, the court looks into the statements of the witnesses under Section 161CrPC to appreciate the case of the prosecution. However, statements under Section 161CrPC are not signed statements and there is no provision in the CrPC akin to Section 50 or Section 63 of the PMLA. To some extent the statement recorded under Section 50 is akin

to a statement recorded under Section 164CrPC as a statement under Section 50 of the PMLA is recorded in judicial proceeding and is a duly-signed statement. Thus statements under Section 50 of the PMLA carry much more weight than a statement recorded under Section 161CrPC. These are specific legislations enacted to handle specific crimes."

47. In "Sanjay Jain versus Enforcement Directorate"

reported in 2024 SCC Online Del 1656 the extent of reliance to be placed in a statement recorded u/s 50 PMLA, 2002 was considered and it was held as follows:

"55. In Manish Sisodia v. Directorate of Enforcement, (2023) 4 HCC (Del) 66 this Court held that though the statements recorded under Section 50 of the PMLA are admissible in evidence but their evidentiary value has to be weighed at the time of trial. The Court did not look into the contradictions in the testimony of the witnesses observing that the Court cannot appreciate the evidence meticulously but at the same time observed that the Court cannot take the statements under Section 50 of the PMLA as gospel truth and only broad probabilities have to be seen. Accordingly, the Court did not make any comment on such contradictions observing that the trial is yet to take place. The relevant part of the decision reads thus:

"55. This Court is fully conscious of the fact that personal liberty is a sacrosanct right and pre-trial detention cannot be taken as a punitive measure. However, the court has to strike a balance between the interest of an individual and the interest of the society at large. This Court is also conscious of the fact that though the statements recorded under Section 50 of the PMLA are admissible in evidence but their evidentiary value has to be weighed at the time of trial...

XXXX XXXX XXXX XXXX

57. Learned Senior Counsels have invited the attention of this Court towards the contradictions in the testimony of the witnesses. However, this Court is fully conscious of the fact that at the stage of bail, the court cannot appreciate the evidence meticulously. This Court at this stage, would restrain itself to make any comment further on this as the trial is yet to take place. The option before this Court is either to go into the meticulous examinations of the witnesses as being argued by the learned defence counsels or to take into account the statements recorded under Section 50 of the PMLA by the ED. It is correct that the case of ED is based on the statements under Section 50 of the PMLA cannot be taken as gospel truth but at the same, the court has to take into account the probabilities and the legislative intent behind enacting Section 50 of the PMLA. The statements under Section 50 of the PMLA are not akin to Section 161CrPC. The

bare perusal of Section 50 makes it clear that these are deemed to be judicial proceedings. There are consequences for making a false statement or not complying to the summons under Section 50 of the PMLA as provided under Section 63 of the PMLA.

58. This Court at this stage cannot go into the probative value of the witnesses nor can it meticulously examine those facts. The involvement of the third parties in the formulating and drafting of the policy certainly points at mens rea. The jurisdiction of bail is a discretionary jurisdiction. But this discretion has to be exercised on the settled principles in a judicial manner. The court has to bring in its judicial experience to arrive at a conclusion, which should be rational and logical. It is pertinent to mention that the accused and complainant/prosecution are entitled to know the reasons on the basis of which their bail application has been decided, but at the same time such reason should not be detailed in such a manner that it may prejudice the trial."

(emphasis supplied)

56. The principle that emerges from Vijay Madanlal Choudhary (supra), as well as the above decisions as regards the statement recorded under Section 50 of the Act is that such statements are recorded in a proceeding which is deemed to be a judicial proceeding within the meaning of Section 193 and Section 228 of the Penal Code, 1860 and is admissible in evidence. The said statements are to be meticulously appreciated only by the Trial Court during the course of the trial and there cannot be a mini-trial at the stage of bail. However, when the statements recorded under Section 50 of PMLA are part of the material collected during investigation, such statements can certainly be looked into at the stage of considering bail application albeit for the limited purpose of ascertaining whether there are broad probabilities, or reasons to believe, that the bail applicant is not guilty. Meaning thereby, the statements under Section 50 of the PMLA have to be taken at their face value, but in case any such statement is patently self-contradictory or two separate statements of the same witness are inconsistent with each other on material aspects, then such contradictions and inconsistencies will be one of the factors that will enure to the benefit of the bail applicant whilst ascertaining the broad probabilities, though undoubtedly the probative value of the statement(s) of the witnesses and their credibility or reliability, will be analyzed by the trial court only at the stage of trial for arriving at a conclusive finding apropos the guilt of the applicant."

48. The statement u/s 50 PMLA, 2002 is admissible in evidence as such statement is deemed to be recorded in a judicial proceeding as envisaged in sub-Section 4 of Section 50 PMLA, 2002. This Court is aware of the fact that meticulously delving into such evidence is the domain of the learned trial court

and, therefore, only a fleeting reference has been made of the statements recorded u/s 50 PMLA, 2002 of the relevant persons. However, the same does not put an embargo upon the Court to disregard such statements in its totality particularly in a situation when the plea of bail of an accused is being considered. However, the contours of such statements can be taken into consideration in order to ascertain as to whether "reason to believe" that the petitioner is not guilty is fulfilled as enshrined in Section 45 PMLA, 2002 and which reads thus:

"45. Offences to be cognizable and non- bailable.--(1) [Notwithstanding anything contained in the Code of Criminal Procedure, 1973 (2 of 1974), no person accused of an offence [under this Act] shall be released on bail or on his own bond unless--]

(i) the Public Prosecutor has been given an opportunity to oppose the application for such release; and

(ii) where the Public Prosecutor opposes the application, the court is satisfied that there are reasonable grounds for believing that he is not guilty of such offence and that he is not likely to commit any offence while on bail:

Provided that a person, who, is under the age of sixteen years, or is a woman or is sick or infirm [or is accused either on his own or along with other co-accused of money- laundering a sum of less than one crore rupees], may be released on bail, if the Special Court so directs:

Provided further that the Special Court shall not take cognizance of any offence punishable under Section 4 except upon a complaint in writing made by--

(i) the Director; or

(ii) any officer of the Central Government or a State Government authorised in writing in this behalf by the Central Government by a general or special order made in this behalf by that Government.

[(1-A) Notwithstanding anything contained in the Code of Criminal Procedure, 1973 (2 of 1974), or any other provision of this Act, no police officer shall investigate into an offence under this Act unless specifically authorised, by the Central Government by a general or special order, and, subject to such conditions as may be prescribed.] (2) The limitation on granting of bail specified in [\* \* \*] sub-section (1) is in addition to the limitations under the Code of Criminal Procedure, 1973 (2 of 1974) or any other law for the time being in force on granting of bail. [Explanation.--For the removal of doubts, it is clarified that the expression "Offences to be cognizable and non-bailable" shall mean and shall be deemed to have always meant that all offences under this Act shall be cognizable offences and non-bailable offences notwithstanding anything to the contrary

contained in the Code of Criminal Procedure, 1973 (2 of 1974), and accordingly the officers authorised under this Act are empowered to arrest an accused without warrant, subject to the fulfilment of conditions under section 19 and subject to the conditions enshrined under this section.]"

49. In *Gurucharan Singh versus State (Delhi Admn.)*" (supra) the "reasonable grounds" as appearing in Section 437 Cr.P.C. has been considered and it has been held as follows:

"21. Section 437 CrPC is concerned only with the Court of Magistrate. It expressly excludes the High Court and the Court of Session. The language of Section 437(1) may be contrasted with Section 437(7) to which we have already made a reference. While under sub-section (1) of Section 437 CrPC the words are: "If there appear to be reasonable grounds for believing that he has been guilty", sub-section (7) says: "that there are reasonable grounds for believing that the accused is not guilty of such an offence". This difference in language occurs on account of the stage at which the two sub-sections operate. During the initial investigation of a case in order to confine a person in detention, there should only appear reasonable grounds for believing that he has been guilty of an offence punishable with death or imprisonment for life. Whereas after submission of charge-sheet or during trial for such an offence the Court has an opportunity to form somewhat clear opinion as to whether there are reasonable grounds for believing that the accused is not guilty of such an offence. At that stage the degree of certainty of opinion in that behalf is more after the trial is over and judgment is deferred than at a pre-trial stage even after the charge-sheet. There is a noticeable trend in the above provisions of law that even in case of such non-bailable offences a person need not be detained in custody for any period more than it is absolutely necessary, if there are no reasonable grounds for believing that he is guilty of such an offence. There will be, however, certain overriding considerations to which we shall refer hereafter. Whenever a person is arrested by the police for such an offence, there should be materials produced before the Court to come to a conclusion as to the nature of the case he is involved in or he is suspected of. If at that stage from the materials available there appear reasonable grounds for believing that the person has been guilty of an offence punishable with death or imprisonment for life, the Court has no other option than to commit him to custody. At that stage, the Court is concerned with the existence of the materials against the accused and not as to whether those materials are credible or not on the merits."

50. In the case of *"Nimmagadda Prasad versus Central Bureau of Investigation"* (supra), it has been held as under:

"24. While granting bail, the court has to keep in mind the nature of accusations, the nature of evidence in support thereof, the severity of the punishment which conviction will entail, the character of the accused, circumstances which are peculiar to the accused, reasonable possibility of securing the presence of the accused at the trial, reasonable apprehension of the witnesses being tampered with, the larger interests of the public/State and other similar considerations. It has also to be kept in mind that for the purpose of granting bail, the legislature has used the words "reasonable grounds for believing" instead of "the evidence" which means the court dealing with the grant of bail can only satisfy itself as to whether there is a genuine case against the accused and that the prosecution will be able to produce prima facie evidence in support of the charge. It is not expected, at this stage, to have the evidence establishing the guilt of the accused beyond reasonable doubt."

51. In the case of "Ranjitsing Brahmajeetsing Sharma versus State of Maharashtra" (supra), the Hon'ble Supreme Court was considering the interpretation and application of the Maharashtra Control of Organized Crime Act, 1999 (MCOCA) and the twin conditions for grant of bail as enumerated in Section 21 of the said Act seems to be almost pari materia with Section 45 PMLA, 2002 and the factors which must weigh in the mind of the Court while granting or denying bail has been dealt with in the following manner.

"45. It is, furthermore, trite that for the purpose of considering an application for grant of bail, although detailed reasons are not necessary to be assigned, the order granting bail must demonstrate application of mind at least in serious cases as to why the applicant has been granted or denied the privilege of bail.

46. The duty of the court at this stage is not to weigh the evidence meticulously but to arrive at a finding on the basis of broad probabilities. However, while dealing with a special statute like MCOCA having regard to the provisions contained in sub-section (4) of Section 21 of the Act, the court may have to probe into the matter deeper so as to enable it to arrive at a finding that the materials collected against the accused during the investigation may not justify a judgment of conviction. The findings recorded by the court while granting or refusing bail undoubtedly would be tentative in nature, which may not have any bearing on the merit of the case and the trial court would, thus, be free to decide the case on the basis of evidence adduced at the trial, without in any manner being prejudiced thereby.

47. In Kalyan Chandra Sarkar v. Rajesh Ranjan [(2004) 7 SCC 528 : 2004 SCC (Cri) 1977] this Court observed : (SCC pp. 537-38, para 18) "18. We agree that a conclusive finding in regard to the points urged by both the sides is not expected of the court considering a bail application. Still one should not forget, as observed by this Court in the case Puran v. Rambilas [(2001) 6 SCC 338 : 2001

SCC (Cri) 1124] : (SCC p. 344, para 8) „Giving reasons is different from discussing merits or demerits. At the stage of granting bail a detailed examination of evidence and elaborate documentation of the merits of the case has not to be undertaken. ... That did not mean that whilst granting bail some reasons for prima facie concluding why bail was being granted did not have to be indicated.“ We respectfully agree with the above dictum of this Court. We also feel that such expression of prima facie reasons for granting bail is a requirement of law in cases where such orders on bail application are appealable, more so because of the fact that the appellate court has every right to know the basis for granting the bail. Therefore, we are not in agreement with the argument addressed by the learned counsel for the accused that the High Court was not expected even to indicate a prima facie finding on all points urged before it while granting bail, more so in the background of the facts of this case where on facts it is established that a large number of witnesses who were examined after the respondent was enlarged on bail had turned hostile and there are complaints made to the court as to the threats administered by the respondent or his supporters to witnesses in the case. In such circumstances, the Court was duty-bound to apply its mind to the allegations put forth by the investigating agency and ought to have given at least a prima facie finding in regard to these allegations because they go to the very root of the right of the accused to seek bail. The non-consideration of these vital facts as to the allegations of threat or inducement made to the witnesses by the respondent during the period he was on bail has vitiated the conclusions arrived at by the High Court while granting bail to the respondent. The other ground apart from the ground of incarceration which appealed to the High Court to grant bail was the fact that a large number of witnesses are yet to be examined and there is no likelihood of the trial coming to an end in the near future. As stated hereinabove, this ground on the facts of this case is also not sufficient either individually or coupled with the period of incarceration to release the respondent on bail because of the serious allegations of tampering with the witnesses made against the respondent."

52. The consideration which has to be bestowed in the case of circumstantial evidence has been assigned in the under noted paragraph.

"43. Section 21(4) of MCOCA does not make any distinction between an offence which entails punishment of life imprisonment and an imprisonment for a year or two. It does not provide that even in case a person remains behind the bars for a period exceeding three years, although his involvement may be in terms of Section 24 of the Act, the court is prohibited to enlarge him on bail. Each case, therefore, must be considered on its own facts. The question as to whether he is involved in the commission of organised crime or abetment thereof must be judged objectively. Only because some allegations have been made against a high-ranking officer, which cannot be brushed aside, may not by itself be

sufficient to continue to keep him behind the bars although on an objective consideration the court may come to the conclusion that the evidences against him are not such as would lead to his conviction. In case of circumstantial evidence like the present one, not only culpability or mens rea of the accused should be prima facie established, the court must also consider the question as to whether the circumstantial evidence is such whereby all the links in the chain are complete."

53. The restriction on the power of Court to grant bail has been dealt with and the same reads as under:

"35. Presumption of innocence is a human right. (See Narendra Singh v. State of M.P. [(2004) 10 SCC 699 : 2004 SCC (Cri) 1893] , SCC para 31.) Article 21 in view of its expansive meaning not only protects life and liberty but also envisages a fair procedure. Liberty of a person should not ordinarily be interfered with unless there exist cogent grounds therefor. Sub- section (4) of Section 21 must be interpreted keeping in view the aforementioned salutary principles. Giving an opportunity to the Public Prosecutor to oppose an application for release of an accused appears to be reasonable restriction but clause (b) of sub-section (4) of Section 21 must be given a proper meaning.

36. Does this statute require that before a person is released on bail, the court, albeit prima facie, must come to the conclusion that he is not guilty of such offence? Is it necessary for the court to record such a finding? Would there be any machinery available to the court to ascertain that once the accused is enlarged on bail, he would not commit any offence whatsoever?

37. Such findings are required to be recorded only for the purpose of arriving at an objective finding on the basis of materials on record only for grant of bail and for no other purpose.

38. We are furthermore of the opinion that the restrictions on the power of the court to grant bail should not be pushed too far. If the court, having regard to the materials brought on record, is satisfied that in all probability he may not be ultimately convicted, an order granting bail may be passed. The satisfaction of the court as regards his likelihood of not committing an offence while on bail must be construed to mean an offence under the Act and not any offence whatsoever be it a minor or major offence. If such an expansive meaning is given, even likelihood of commission of an offence under Section 279 of the Penal Code, 1860 may debar the court from releasing the accused on bail. A statute, it is trite, should not be interpreted in such a manner as would lead to absurdity. What would further be necessary on the part of the court is to see the culpability of the accused and his involvement in the commission of an organised crime either directly or indirectly. The court at the time of considering the

application for grant of bail shall consider the question from the angle as to whether he was possessed of the requisite mens rea. Every little omission or commission, negligence or dereliction may not lead to a possibility of his having culpability in the matter which is not the sine qua non for attracting the provisions of MCOCA. A person in a given situation may not do that which he ought to have done. The court may in a situation of this nature keep in mind the broad principles of law that some acts of omission and commission on the part of a public servant may attract disciplinary proceedings but may not attract a penal provision."

54. In "Tarun Kumar versus Assistant Director Directorate of Enforcement" (supra) the twin conditions as enshrined in Section 45 PMLA, 2002 was once again put to test and it has been held as follows:

"17. As well settled by now, the conditions specified under Section 45 are mandatory. They need to be complied with. The Court is required to be satisfied that there are reasonable grounds for believing that the accused is not guilty of such offence and he is not likely to commit any offence while on bail. It is needless to say that as per the statutory presumption permitted under Section 24 of the Act, the Court or the Authority is entitled to presume unless the contrary is proved, that in any proceedings relating to proceeds of crime under the Act, in the case of a person charged with the offence of money laundering under Section 3, such proceeds of crime are involved in money laundering. Such conditions enumerated in Section 45 of PML Act will have to be complied with even in respect of an application for bail made under Section 439 Cr. P.C. in view of the overriding effect given to the PML Act over the other law for the time being in force, under Section 71 of the PML Act."

55. In "Vijay Madanlal Choudhary & Others versus Union of India" (supra), the broad probabilities based on the materials collected during investigation is to be considered and while reiterating the observations made in "Ranjitsing Brahmajeetsing Sharma", it was concluded thus:

"401. We are in agreement with the observation made by the court in Ranjitsing Brahmajeetsing Sharma (supra). The court while dealing with the application for grant of bail need not delve deep into the merits of the case and only a view of the court based on available material on record is required. The court will not weigh the evidence to find the guilt of the accused which is, of course, the work of Trial Court. The court is only required to place its view based on probability on the basis of reasonable material collected during investigation and the said view will not be taken into consideration by the Trial court in recording its finding of the guilt or acquittal during trial which is based on the evidence adduced during the trial. As explained by this court in Nimmagadda

Prasad (supra), the words used in section 45 of the 2002 Act are "reasonable grounds for believing" which means the court has to see only if there is a genuine case against the accused and the prosecution is not required to prove the charge beyond reasonable doubt."

56. In the case of "Y. Balaji versus Karthik Desari and Another" reported in 2023 SCC Online SC 645, it has been held as follows:

"100. All the three FIRs allege that the accused herein had committed offences included in the Schedule by taking illegal gratification for providing appointment to several persons in the Public Transport Corporation. In one case it is alleged that a sum of more than Rs. 2 crores had been collected and in another case a sum of Rs. 95 lakhs had been collected. It is this bribe money that constitutes the „proceeds of crime“ within the meaning of Section 2(1)(u). It is no rocket science to know that a public servant receiving illegal gratification is in possession of proceeds of crime. The argument that the mere generation of proceeds of crime is not sufficient to constitute the offence of money- laundering, is actually preposterous. As we could see from Section 3, there are six processes or activities identified therein. They are, (i) concealment; (ii) possession; (iii) acquisition; (iv) use;

(v) projecting as untainted property; and (vi) claiming as untainted property. If a person takes a bribe, he acquires proceeds of crime. So, the activity of "acquisition" takes place. Even if he does not retain it but "uses" it, he will be guilty of the offence of money-laundering, since "use" is one of the six activities mentioned in Section 3."

57. In the case of "Vijay Agrawal through prokar versus Enforcement Directorate", reported in (2023) 2 HCC (Del) 651, it has been held as follows:

"35. In the present case, the petitioner is stated to be renowned developer and his plea that he did not know that he is dealing with the tainted money cannot be brushed aside mechanically. If the liberty of an individual is concerned, the court cannot proceed merely on the basis of assumptions and presumptions. The evidentiary value of the statement recorded under Section 50 of the PMLA has to be tested at the end of the trial and not at the stage of bail. The twin conditions of Section 45 do not put an absolute restraint on the grant of bail or require a positive finding qua guilt.

36. A bare perusal of the Section 2(u) of the Prevention of Money-Laundering Act, 2005 which provides for the definition of "proceeds of crime"

indicates that it is the property derived or obtained, directly or indirectly which relates to criminal activity relating to a scheduled offence. Similarly in order to

be punished under Section 3 of the PMLA, it is necessary that person dealing with the "proceed of crime" must have some knowledge that it is tainted money. Though, the direct evidence in this regard may not be possible and the court is also conscious of the fact that at this stage, the evidence cannot meticulously be examined for this purpose. At the same time, for the purpose that evidence cannot be meticulously examined at this stage, the court cannot merely proceed on the basis of assumption. There has to be some substantial link between the money received and criminal activity relating to scheduled offence which can be attributed to the petitioner."

58. The plethora of judgments cited by the learned counsel for the respective sides gives prominence to the broad parameters which have to be satisfied in order to fulfill the twin conditions set out in Section 45 PMLA, 2002.

59. "Ranjitsing Brahmajeetsing Sharma versus State of Maharashtra" (supra), reminds the duty of the Court not to weigh the evidence meticulously at the time of consideration of bail but to arrive at a finding on the basis of broad probabilities. The application of mind must be inherent in the order refusing or granting bail to the applicant more so in cases of serious nature.

60. The present case in the perspective of the legal pronouncements referred to above is manifest with circumstantial evidence and according to the Enforcement Directorate the chain is complete thereby foisting the role of the petitioner in the acquisition and possession of 8.86 acres of land at Shanti Nagar, Baragain, Bariatu, Ranchi. It is pertinent to note that in the numerous registers and revenue records recovered from the premises of Bhanu Pratap Prasad the name of the petitioner or his family members does not figure. The plan of a Banquet Hall retrieved from the mobile of Binod Singh in his WhatsApp chat with the petitioner depicts the area as Lalu Khatal, and since the 8.86 acres of land allegedly possessed by the petitioner is in the vicinity of Lalu Khatal and since there was no other open tract of land of considerable dimension in the said area it was inferred that the plan of the Banquet Hall was prepared at the behest of the petitioner being oblivious to the fact that even the clients name did not figure in the plan submitted by Grid Consultants.

61. On consideration of the statements of the persons recorded u/s 50 PMLA, 2002, it transpires that Bhanu Pratap Prasad was directed by Manoj Kumar, Circle Officer, Baragain to submit a verification report giving details of the property measuring 8.86 acres. He has stated about the petitioner being the owner of the said property. The Aamin, Shristidhar Mahto had disclosed that he had "come to know"

that the property belonged to the petitioner. The said Bhanu Pratap Prasad was subsequently confronted with the revenue records recovered from his premises but in none of his ensuing statements the name of the petitioner figures. Ashok Jaiswal, Shashi Bhushan Singh and Bishnu Kumar Bhagat have claimed to have purchased the land in the year 1985 but the petitioner and others had forcibly got them evicted in the year 2009-10 and the complaints made were not entertained by the Police. It is indeed surprising as to how these persons could purchase the land when admittedly it is a "Bakast Bhuinhari"

land which is non-transferrable in terms of Section 48 of the CNT Act. The verification of the land as ostensibly done at the behest of the petitioner is traced back to Abhishek @ Pintu, the Press Advisor and whose initiation of such verification ultimately reached Bhanu Pratap Prasad through various intermediaries, which is apparent from the statement of such persons recorded u/s 50 PMLA, 2002. As per the allegations emanating from the statements of the persons recorded u/s 50 PMLA, 2002, the petitioner had acquired and possessed the land comprising of 8.86 acres in the year 2010 and the boundary wall was also constructed and it seems that only during the tenure of Bhanu Pratap Prasad, Revenue Sub Inspector, Circle Office, Baragain, Ranchi there was a necessity to verify the land in question which seems to be farfetched and with an intent to prosecute the petitioner. The Electric Meter installed in the said premises is in the name of Hilariyas Kachhap and here also the presence of the petitioner in any tangible or intangible form is absent. The Enforcement Directorate has questioned the order dated 29.01.2024 in S.A.R. Case No. 81/2023-24 as the same was instituted by Raj Kumar Pahan at the behest of the petitioner to create parallel evidence to exculpate the petitioner from the schedule offence which would gain strength from the haste with which the order was passed. The order dated 29.01.2024 in S.A.R. Case No. 81/2023-24 had been perused and it seems that all safeguards had been taken as legally required and thereafter the land was ordered to be restored in favour of Raj Kumar Pahan and Others. This order has attained finality in absence of any challenge mounted to it by the other side. It also seems that this was not the only case disposed of by the SAR Court during the period 2023-2024 but three other cases as well were disposed of and the order dated 29.01.2024 considering the reasons given cannot be concluded to be an order fraught with baseless reasonings.

62. The overall conspectus of the case based on broad probabilities does not specifically or indirectly assign the petitioner to be involved in the acquisition and possession as well as concealment of 8.86 acres of land at Shanti Nagar, Baragain, Ranchi connected to the "proceeds of crime". None of the registers/revenue records bare imprint of the direct involvement of the petitioner in the acquisition and possession of the said land. As it has been noticed above, the statement of some of the persons u/s 50 PMLA, 2002 designated the

petitioner in the acquisition and possession of the property in question in the year 2010 without any material worth consideration and for all this while none of the ousted persons had approached the competent authority by registering any complaint which has conveniently been discounted by the Enforcement Directorate that the approaches though made to the Police proved futile. There was no reason for the purported oustees from the land in question not to have approached the authorities for redressal of their grievance if at all the petitioner had acquired and possessed the said land when the petitioner was not in power. The claim of the Enforcement Directorate that its timely action had prevented the illegal acquisition of the land by forging and manipulating the records seems to be an ambiguous statement when considered in the backdrop of the allegation that the land was already acquired and possessed by the petitioner as per some of the statements recorded u/s 50 PMLA, 2002 and that too from the year 2010 onwards.

63. The consequence of the findings recorded by this Court satisfies the condition as at Section 45 PMLA, 2002 to the effect that there is "reason to believe" that the petitioner is not guilty of the offence as alleged. So far as the condition that he is not likely to commit any offence while on bail reference is once again made to the case of "Ranjitsing Brahmajeetsing Sharma versus State of Maharashtra & Another" (supra) which has interpreted such provision as under:

"38. .... The satisfaction of the court as regards his likelihood of not committing an offence while on bail must be construed to mean an offence under the Act and not any offence whatsoever be it a minor or major offence. If such an expansive meaning is given, even likelihood of commission of an offence under Section 279 of the Penal Code, 1860 may debar the court from releasing the accused on bail. A statute, it is trite, should not be interpreted in such a manner as would lead to absurdity..."

64. Though the conduct of the petitioner has been sought to be highlighted by the Enforcement Directorate on account of the First Information Report instituted by the petitioner against the officials of the Enforcement Directorate but on an overall conspectus of the case there is no likelihood of the petitioner committing a similar nature of offence. The twin conditions as prescribed u/s 45 PMLA, 2002 having been fulfilled, I am inclined to allow this application. Accordingly, the petitioner is directed to be released on bail on furnishing bail bond of Rs. 50,000/- (Rupees Fifty Thousand only) with two sureties of the like amount each, to the satisfaction of learned Additional Judicial Commissioner-I-cum-Special Judge, PMLA, Ranchi in connection with ECIR Case No. 06/2023, arising out of ECIR/RNZO/25/2023 dated 26.06.2023.

(Rongon Mukhopadhyay, J.)



## Most Important Supreme Court Judgements

| Case   | Relevance   |
|--|---|
| <b>A.K. Gopalan Case (1950)</b>                      | SC contented that there was no violation of Fundamental Rights enshrined in Articles 13, 19, 21 and 22 under the provisions of the Preventive Detention Act, if the detention was as per the procedure established by law. Here, the SC took a narrow view of Article 21.   |
| <b>Shankari Prasad Case (1951)</b>                   | This case dealt with the amendability of Fundamental Rights (the First Amendment's validity was challenged). The SC contended that the Parliament's power to amend under Article 368 also includes the power to amend the Fundamental Rights guaranteed in Part III of the Constitution.  |
| <b>Berubari Union case (1960)</b>                    | This case was regarding the Parliament's power to transfer the territory of Berubai to Pakistan. The Supreme Court examined Article 3 in detail and held that the Parliament cannot make laws under this article in order to execute the Nehru-Noon agreement. Hence, the 9th Amendment Act was passed to enforce the agreement.  |
| <b>Golaknath case (1967)</b>                         | The questions in this case were whether amendment is a law; and whether Fundamental Rights can be amended or not. SC contented that Fundamental Rights are not amenable to the Parliamentary restriction as stated in Article 13, and that to amend the Fundamental rights a new Constituent Assembly would be required. Also stated that Article 368 gives the procedure to amend the Constitution but does not confer on Parliament the power to amend the Constitution.        |
| <b>Kesavananda Bharati case (1973)</b>               | This judgement defined the basic structure of the Constitution. The SC held that although no part of the Constitution, including Fundamental Rights, was beyond the Parliament's amending power, the "basic structure of the Constitution could not be abrogated even by a constitutional amendment." This is the basis in Indian law in which the judiciary can strike down any amendment passed by Parliament that is in conflict with the basic structure of the Constitution. |
| <b>Indira Nehru Gandhi v. Raj Narain case (1975)</b> | The SC applied the theory of basic structure and struck down Clause(4) of article 329-A, which was inserted by the 39th Amendment in 1975 on the grounds that it was beyond the Parliament's amending power as it destroyed the   |

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|  | Constitution's basic features.   |
| <b>Maneka Gandhi case (1978)</b>               | A main issue in this case was whether the right to go abroad is a part of the Right to Personal Liberty under Article 21. The SC held that it is included in the Right to Personal Liberty. The SC also ruled that the mere existence of an enabling law was not enough to restrain personal liberty. Such a law must also be "just, fair and reasonable."   |
| <b>Minerva Mills case (1980)</b>               | This case again strengthens the Basic Structure doctrine. The judgement struck down 2 changes made to the Constitution by the 42nd Amendment Act 1976, declaring them to be violative of the basic structure. The judgement makes it clear that the Constitution, and not the Parliament is supreme.   |
| <b>Waman Rao Case (1981)</b>                   | The SC again reiterated the Basic Structure doctrine. It also drew a line of demarcation as April 24th, 1973 i.e., the date of the Kesavananda Bharati judgement, and held that it should not be applied retrospectively to reopen the validity of any amendment to the Constitution which took place prior to that date.  |
| <b>Shah Begum case (1985)</b>                  | Milestone case for Muslim women's fight for rights. The SC upheld the right to alimony for a Muslim woman and said that the Code of Criminal Procedure, 1973 is applicable to all citizens irrespective of their religion. This set off a political controversy and the government of the day overturned this judgement by passing the Muslim Women (Protection on Divorce Act), 1986, according to which alimony need be given only during the iddat period (in tune with the Muslim personal law).   |
| <b>MC Mehta Vs. Union of India (1986)</b>      | This case dealt with 3 issues: Scope of Article 32; rule of Absolute Liability or Rylands vs Fletcher to be followed; issue of compensation. SC held that its power under Article 32 is not restricted to preventive measures, but also remedial measures when rights are violated. It also held that in the case of industries engaged in hazardous or inherently dangerous activities, Absolute Liability was to be followed. Finally, it also said that the amount of compensation must be correlated to the magnitude and capacity of the industry so that it will be a deterrent. |
| <b>Indra Sawhney Vs. Union of India (1992)</b> | SC examined the scope and extent of Article 16(4), which provides for the reservation of jobs in favour of backward classes. It upheld the constitutional validity of 27% reservation for the OBCs with certain conditions (like   |

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|   | creamy layer exclusion, no reservation in promotion, total reserved quota should not exceed 50%, etc.)   |
| <b>S. R. Bommai case (1994)</b>                   | In this judgement, the SC tried to curb the blatant misuse of Article 356 (regarding the imposition of President's Rule on states).  |
| <b>Vishaka Vs. State of Rajasthan (1997)</b>      | This case dealt with sexual harassment at the workplace. In the judgement, the SC gave a set of guidelines for employers – as well as other responsible persons or institutions – to immediately ensure the prevention of sexual harassment. These are called 'Vishaka Guidelines'. These were to be considered law until appropriate legislation was enacted.   |
| <b>Samatha Vs. State of Andhra Pradesh (1997)</b> | This judgement nullified all mining leases granted by the Andhra Pradesh State government in the Scheduled areas and asked it to stop all mining operations. It declared that forest land, tribal land, and government land in scheduled areas could not be leased to private companies or non-tribal for industrial operations. Such activity is only permissible to a government undertaking and tribal people.  |
| <b>Lily Thomas Vs. Union of India (2000)</b>      | Here, the SC held that the second marriage of a Hindu man without divorcing the first wife, even if the man had converted to Islam, is void unless the first marriage had been dissolved according to the Hindu Marriage Act.  |
| <b>I.R Coelho and State of Tamil Nadu 2007</b>    | This judgement held that if a law is included in the 9th Schedule of the Indian Constitution, it can still be examined and confronted in court. The 9th Schedule of the Indian Constitution contains a list of acts and laws which cannot be challenged in a court of law. The Waman Rao ruling ensured that acts and laws mentioned in the IX schedule till 24 April 1973, shall not be changed or challenged, but any attempt to amend or add more acts to that schedule will suffer close inspection and examination by the judiciary system. |
| <b>Pedophilia case (2011)</b>                     | The SC restored the conviction and sentence of 6-year (RI) rigorous imprisonment imposed on 2 UK nationals who were acquitted by the Bombay High Court in a paedophilia case. The court said that "the sexual abuse of children is one of the most heinous crimes."  |
| <b>Aruna Shanbaug Case (2011)</b>                 | The SC ruled that individuals had a right to die with dignity, allowing passive euthanasia with guidelines. The need to reform India's laws on euthanasia was triggered by the tragic case of Aruna Shanbaug who lay in a vegetative   |

|  |   |
|--|---|
|  | state (blind, paralysed and deaf) for 42 years.   |
| <b>NOTA judgement (2013)</b>                                       | This judgement introduced the NOTA (None-Of-The-Above) option for Indian voters.  |
| <b>Lily Thomas Vs. Union of India (2013)</b>                       | The SC ruled that any MLA, MLC or MP who was found guilty of a crime and given a minimum of 2 year imprisonment would cease to be a member of the House with immediate effect.  |
| <b>Nirbhaya Case (2014)</b>  | Introduction of the Criminal Law (Amendment) Act, 2013 and definition of rape under the Protection of Children from Sexual Offences Act, 2012, the Indian Evidence Act, 1872, Indian Penal Code, 1860 and Code of Criminal Procedures, 1973.                              |
| <b>National Legal Services Authority Vs. Union of India (2014)</b> | This case resulted in the recognition of transgender persons as a third gender. The SC also instructed the government to treat them as minorities and expand the reservations in education, jobs, education, etc.   |
| <b>Triple Talaq Judgement (2016)</b>                               | The SC outlawed the backward practice of instant ‘triple talaq’, which permitted Muslim men to unilaterally end their marriages by uttering the word “talaq” three times without making any provision for maintenance or alimony. Read about the Triple Talaq Bill, 2019. |
| <b>Right to Privacy (2017)</b>                                     | The SC declared the right to privacy as a Fundamental Right protected under the Indian Constitution.  |
| <b>Repealing Section 377 (2018)</b>                                | The SC ruled that Section 377 was unconstitutional “in so far as it criminalises consensual sexual conduct between adults of the same sex.”   |
| <b>L Chandra Kumar Case (1997)</b>                                 | The SC ruled that the power of judicial review vested in the Supreme Court and High Courts by Articles 32 (Right to Constitutional Remedies) and 226 respectively is a part of the basic structure of the Constitution.   |
| <b>Justice K.S. Puttuswamy Case (2017)</b>                         | This SC judgement protects individual rights against the invasion of one’s privacy.   |
| <b>Habeas Corpus Case (1976) – ADM Jabalpur Case</b>               | A much-criticised judgement of the SC, in which the majority ruling went against individual freedom and seemed to favour the state. Justice Khanna’s dissent is also well-known.  |
| <b>Romesh Thapar Case (1950)</b>                                   | Here, the SC held that the freedom of speech and expression includes freedom of propagation of ideas that can only be ensured by circulation.   |

**Important Notifications**

**HIGH COURT OF JUDICATURE AT ALLAHABAD**

**NOTIFICATION**

**DATED: ALLAHABAD: JUNE 26, 2024**

**No. 1696 /Admin. (Services)/2024**

The Chief Metropolitan Magistrate, Additional Chief Metropolitan Magistrate and Metropolitan Magistrate, First Class of the District Kanpur Nagar to be Chief Judicial Magistrate, Additional Chief Judicial Magistrate and Judicial Magistrate, First Class respectively **w.e.f. 01.07.2024.**

**BY ORDER OF THE HON'BLE COURT**

**sd/-**

**(RAJEEV BHARTI)**

**REGISTRAR GENERAL**

**MINISTRY OF PERSONNEL, PUBLIC GRIEVANCES AND PENSIONS  
(Department of Personnel and Training)**

**NOTIFICATION**

**New Delhi, the 21st June, 2024**

**S.O. 2422(E).**—In exercise of the powers conferred by sub-section (2) of section 1 of the **Public Examinations (Prevention of Unfair Means) Act, 2024** (1 of 2024), the Central Government hereby appoints the **21st day of June, 2024** as the date on which the provisions of the said Act shall come into force.

**[F. No. 39020/12/2023-PP(B.I)]**

**MANOJ KUMAR DWIVEDI,  
Addl. Secy.**

## 2. Study Material-G.K.

### **Dance Forms in India**

The 2 major dance forms in India are classical and folk dance. The major difference between Classical and Folk dance is the origin. **Classical dance** has a deep-rooted relationship with the Natya Shastra where the specific features of each of the Classical dance forms have been mentioned. **Folk dance**, on the other hand, emerged from the local tradition of the respective state, ethnic or geographic regions.

### **Classical Dance in India**

The classical dance form originated from the Natya Shastra. There are 8 classical dance forms in India as per the source and scholars.

The **Cultural Ministry of India** has included **Chhau** in the list of classical dances making a total of 9 classical dance forms.

| <b>List of Classical dances in India</b> | <b>State of Origin</b>             |
|--|------------------------------------|
| Bharatnatyam                             | Tamil Nadu                         |
| Kathak                                   | Uttar Pradesh                      |
| Kuchipudi                                | Andhra Pradesh                     |
| Odissi                                   | Odisha                             |
| Kathakali                                | Kerala                             |
| Sattriya                                 | Assam                              |
| Manipuri                                 | Manipur                            |
| Chhau                                    | Orissa, Jharkhand, and West Bengal |

### **Classical Dances of India**

**Bharatanatyam** is based on performance and aesthetic ideas outlined in classics such as Bharata's Natyashastra. It offers a large collection of songs in Telugu, Tamil, and Sanskrit. The topics include a wide variety of human and heavenly love and are commonly classified as *Shringara* (romantic love) and *Bhakti* (devotion). Bharatanatyam music is part of the Carnatic system of music from southern India.

**Kathak** is the main dance of northern India, and it is still extensively practised in Uttar Pradesh, Rajasthan, Delhi, Madhya Pradesh, and even regions of western and eastern India. It is said to be related to the storytelling art of Kathakaras, or

storytellers, who have for centuries taught the scriptures, the epics Ramayana and Mahabharata, and puranic literature to the general people.

**Kuchipudi**, one of India's primary dance genres, originated in Andhra Pradesh, where it evolved significantly as a result of the Bhakti movement that began in the 7th century AD. Nritta, Nritya, and Natya's Kuchipudi is a dance-drama. The Nritta is made up of teermanams and jatis, the Nritya is made up of Sabdams, and the Natya is made up of acting with Mudras for the songs.

**Odissi dance** originated in Orissa, India's easternmost state, where it was first performed as part of temple duty by 'maharis,' or female temple employees. The traditional dance was reshaped as a theatre art in the mid-twentieth century, drawing on not just existing dance art but also representations of dance in Orissa's mediaeval sculpture, painting, and literature.

**Kathakali**, or 'story play,' emerged in the seventeenth century in Kerala, southern India, under the patronage of the prince of Karnataka, who created plays for performance based on the epic Ramayana in Malayalam, the local language. Most Kathakali plays, which have been passed down to us in a constant stream over three centuries, are based on stories from the Ramayana and Mahabharata.

**Sattriya dance** refers to the body of dance and danced theatre produced in Assam's sattras or monasteries during the sixteenth century when the Vaishnava faith spread over the nation thanks to the saint and reformer Shankaradeva (1449-1586). It is a separate genre within classical Indian dance, with an advanced vocabulary of hand gestures (hasta), footwork (pada karma), movement and emotion (Nritta and Abhinaya), and a repertory based on Krishna devotion.

**Manipuri dance** emerged in Manipur in north-eastern India and is rooted in the Vaishnava beliefs of the Meiteis, or Manipur valley people. Manipur's dance is divided into two sections: jagoi and cholom, which match the lasya and tandava parts mentioned in Sanskrit literature. These are distinct streams, and an artist can spend a lifetime honing any form within the spectrum.

**Mohiniattam** originated in Kerala in southern India and is named after the mythical enchantress Mohini. It is a dance of feminine grace and has grown out of performances connected with Kerala's temples. Mohiniattam employs rhythms unique to Kerala: the rhythmic syllables utilised are those of the Maddalam, a drum used to accompany female characters in Kathakali theatre. The Edakka is the main percussion instrument in the performance.

## Folk Dances in India

- Folk dances in India represent the culture and tradition of the community from where they originated.
- Folk dances are usually performed during the respective community's celebration- childbirth, festivals, weddings, etc.

There are different types of folk dances in India.

**The list of Folk Dances in India is given below:**

| State of Origin   | List of Folk Dances in India  |
|-------------------|---|
| Andhra Pradesh    | Vilasini Natyam, Bhamakalpam, Veerاناتyam, Dappu, Tappeta Gullu, Lambadi, Dhimsa, Kolattam. |
| Arunachal Pradesh | Buiya, Chalo, Wancho, Pasi Kongki, Ponung, Popir  |
| Assam             | Bihu, Bichhua, Natpuja, Maharas, Kaligopal, Bagurumba, Naga dance, Khel Gopal.              |
| Bihar             | Jata-Jatin, Bakho-Bakhain, Panwariya  |
| Chhattisgarh      | Gaur Maria, Panthi, Raut Nacha, Pandwani, Vedamati, Kapalik                                 |
| Gujarat           | Garba, Dandiya Raas, Tippani Juriun, Bhavai   |
| Goa               | Tarangamel, Koli, Dekhni, Fugdi, Shigmo, Ghode, Modni, Samayi nrutya, Jagar, Ranmale        |
| Haryana           | Jhumar, Phag, Daph, Dhamal, Loor, Gugga, Khor.  |
| Himachal Pradesh  | Jhora, Jhali, Chharhi, Dhaman, Chhapeli, Mahasu   |
| Jammu & Kashmir   | Rauf, Hikar, Mandjas, Kud Dandi Nach  |
| Jharkhand         | Alkap, Karma Munda, Agni, Jhumar, Janani Jhumar, Mardana Jhumar, Paika, Phagua              |
| Karnataka         | Yakshagana, Huttari, Suggi, Kunitha, Karga  |
| Kerala            | Ottam Thullal, Kaikottikali   |
| Maharashtra       | Lavani, Nakata, Koli, Lezim, Gafa, Dahikala Dasavtar  |
| Madhya Pradesh    | Jawara, Matki, Aada, Khada Nach, Phulpati, Grida Dance, Selalarki, Selabhadoni              |
| Manipur           | Dol Chalam, Thang Ta, Lai Haraoba, Pung Cholom  |
| Meghalaya         | Ka Shad Suk Mynsiem, Nongkrem, Laho   |
| Mizoram           | Cheraw Dance, Khuallam, Chailam, Sawlakin, Chawnglaizawn, Zangtalam                         |
| Nagaland          | Rangma, Zeliang, Nsuirolians, Gethinglim  |

|               |   |
|---------------|---|
| Odisha        | Savari, Ghumara, Painka, Munari   |
| Punjab        | Bhangra, Giddha, Daff, Dhaman, Bhand  |
| Rajasthan     | Ghumar, Chakri, Ganagor, Jhulan Leela, Jhuma, Suisini, Ghapal                             |
| Sikkim        | Chu Faat, Sikkari, Singhi Chaam or the Snow Lion, Yak Chaam, Denzong Gnenha, Tashi Yangku |
| Tamil Nadu    | Kumi, Kolattam, Kavadi  |
| Tripura       | Hojagiri  |
| Uttar Pradesh | Nautanki, Raslila, Kajri, Jhora, Chappeli   |
| Uttarakhand   | Garhwali, Kumayuni, Kajari, Jhora, Raslila  |

### 3. Study Material-Language

#### Words Confused and Misunderstood

| S.N. | Words              | Meaning   |
|------|--------------------|---|
| 1.   | <b>Acceptance</b>  | Acceptance is used to express the active sense of the verb i.e. the act of accepting. It is a common word.                                  |
|      | <b>Acceptation</b> | Acceptation is used to express the passive sense (to be accepted). Acceptation is indicator of the state of being accepted.                 |
| 2.   | <b>Accident</b>    | Accident means;<br>(a) chance, fortune<br>(b) untoward happening, mishappening  |
|      | <b>Incident</b>    | Incident means event, occurrence or episode   |
| 3.   | <b>Accord</b>      | Accord means agreement  |
|      | <b>Accordance</b>  | Accordance means conformity or compliance   |
| 4.   | <b>Act</b>         | An act is the single thing done, or what is done by a single effort, as that is your act or his act   |
|      | <b>Action</b>      | An action may consist of more acts than one or embrace the causes or the consequence of the action, as a bold action, judge of actions etc. |
| 5.   | <b>Advice</b>      | Advice is a noun, which means an opinion or recommendation offered as a guide to action, conduct, etc.                                      |
|      | <b>Advise</b>      | Advise is a verb, which means “to give counsel to; offer an opinion or suggestion as worth following  |
| 6.   | <b>Actuate</b>     | Actuate means to move mechanical things to action   |
|      | <b>Activate</b>    | Activate means to make active   |
| 7.   | <b>Affect</b>      | Affect is verb and stoats to influence; to have effect on.  |
|      | <b>Effect</b>      | Effect means result or consequence  |
| 8.   | <b>Allusion</b>    | Allusion means reference  |
|      | <b>Illusion</b>    | Illusion means deception  |
| 9.   | <b>Alluvion</b>    | Alluvion means “the flow or wash of water against a river bank”   |
|      | <b>Alluvium</b>    | Alluvium means “a deposit of soil, clay, or the sock of such a deposit caused by an alluvion.”  |
| 10.  | <b>Ascent</b>      | Ascent means the act of ascending   |
|      | <b>Assent</b>      | Assent means to approve, to sanction or to put signature on   |

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| 11. | <b>Bath</b>       | Bath means a large open container for water, in which to wash the whole body while sitting in it or an act washing the body in a bath.   |
|     | <b>Bathe</b>      | Bathe refers to swimming or to therapeutic washing   |
| 12. | <b>Beside</b>     | Beside means next to, by the side of or near something or someone.   |
|     | <b>Besides</b>    | Besides means in addition to, other than, as well as, apart from something or someone.   |
| 13. | <b>Beneficial</b> | Beneficial means advantageous, profitable, favourable, producing benefits  |
|     | <b>Beneficent</b> | Beneficent means doing good, charitable.   |
| 14. | <b>Blatant</b>    | Blatant means done openly and unashamedly  |
|     | <b>Flagrant</b>   | Flagrant means shocking  |
| 15. | <b>Breath</b>     | The word "breath" is a noun. It is the act of breathing; the air that is inhaled and exhaled.  |
|     | <b>Breathe</b>    | The word "breathe" is a verb. It means to take a breath by inhaling and exhaling.  |
| 16. | <b>Cannon</b>     | Cannon means a big gun or the ear of a bell by which the bell hangs  |
|     | <b>Canon</b>      | Canon means<br>(a) a corpus of writings;<br>(b) an accepted notion or principle; or<br>(c) a law or regulation.  |
| 17. | <b>Canvass</b>    | Canvas means<br>(i) to examine in detail<br>(ii) to discuss or debate<br>(iii) to solicit orders or political support or<br>(iv) to take stock of public opinion.  |
|     | <b>Canvas</b>     | Canvas is the heavy cloth  |
| 18. | <b>Cast</b>       | Cast means to throw, to give   |
|     | <b>Caste</b>      | Caste is a form of social stratification characterized by endogamy, hereditary transmission of a style of life which often includes an occupation, ritual status in a hierarchy, and customary social interaction and exclusion based on cultural notions of purity and pollution. |
| 19. | <b>Cause</b>      | A thing that gives rise to an action, phenomenon, or condition   |
|     | <b>Reason</b>     | Reason is the explanation of something, as the court gives reason for its judgment   |
| 20. | <b>Causality</b>  | Causality shows the principle of causal relationship; the relation of cause and effect.  |

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|-----|---------------------|---|
|     | <b>Causation</b>    | Causation means the causing or producing effect.  |
| 21. | <b>Chasten</b>      | Chasten means to discipline, punish, or subdue.   |
|     | <b>Chastise</b>     | Chastise means to punish, thrash.   |
| 22. | <b>Centre</b>       | Centre means the middle point of something  |
|     | <b>Center</b>       | Center means a place or institution   |
| 23. | <b>Ceremonial</b>   | Ceremonial relates to all manners of ceremonies and ritual or formal  |
|     | <b>Ceremonious</b>  | Ceremonious represent lightly disparaging, suggests an overtone formality.  |
| 24. | <b>Childlike</b>    | Childlike has positive connotations of simplicity; innocence and truthfulness   |
|     | <b>Childish</b>     | Childish has negative connotations of puerility, peevishness and silliness  |
| 25. | <b>Chronic</b>      | Chronic stands for old, lasting for considerable time like chronic Asthma, chronic phthisis etc.  |
|     | <b>Acute</b>        | Acute indicates extreme intensity, as acute pain, acute inflammation etc.   |
| 26. | <b>Cleanliness</b>  | Cleanliness is used of persons and their habits.  |
|     | <b>Cleanness</b>    | Cleanness is used of things or places.  |
| 27. | <b>Clear</b>        | Clear is used to show transparency; free from hindrance.  |
|     | <b>Clean</b>        | Clean is used to express the opposite of dirty  |
| 28. | <b>Codicil</b>      | Codicil is a testamentary instrument ancillary to a will that adds to, varies or revokes provisions in the will.                                  |
|     | <b>Will</b>         | Will is a written or oral expression of one's intention regarding the disposition of one's property at death.                                     |
| 29. | <b>Collision</b>    | Collision is when two vessels strike each other   |
|     | <b>Allision</b>     | An allision occurs when a vessel strikes a stationary object, such as a bridge or dock  |
| 30. | <b>Collocate</b>    | Collocate means to arrange in place to set side by side.  |
|     | <b>Collate</b>      | Collate means to compare minutely and critically; to collect and compare for the purpose of arranging accurately; or to assemble in proper order. |
| 31. | <b>Commendable</b>  | Commendable means praiseworthy, laudable.   |
|     | <b>Commendatory</b> | Commendatory means 'expressing commendation, laudatory.   |
| 32. | <b>Comminate</b>    | Comminate means "to denounce".  |
|     | <b>Comminute</b>    | Comminute means "to pulverize".   |
| 33. | <b>Complacent</b>   | Complacent means self-satisfied, smug, pleased  |

|     |                        |  |
|-----|------------------------|--|
|     |                        | with oneself.  |
|     | <b>Complaisant</b>     | Complaisant means obliging, accommodating, polio.  |
| 34. | <b>Complement</b>      | Complement means to supplement appropriately or adequately,  |
|     | <b>Compliment</b>      | Compliment means to praise, pay tribute.   |
| 35. | <b>Comprehensive</b>   | Comprehensive means large, extensive e.g., comprehensive account, comprehensive note.  |
|     | <b>Comprehensible</b>  | Comprehensible means understandable.   |
| 36. | <b>Condemn</b>         | Condemn means to render judgment against a person or a thing   |
|     | <b>Contemn</b>         | Contemn means to hold in contempt, to despise.   |
| 37. | <b>Congruent</b>       | Congruent is used in the sense "coincident throughout; in accordance with"   |
|     | <b>Congruous</b>       | Congruous means "appropriate, fitting; marked by harmonious agreement."  |
| 38. | <b>Connote</b>         | Connote implies in addition to the literal meaning.  |
|     | <b>Denote</b>          | Denote signifies the literal meaning, to indicate.   |
| 39. | <b>Consensual</b>      | Consensual means "having or expressing, or made with consent."   |
|     | <b>Consentaneous</b>   | Consentaneous means unanimous or agreeing.   |
| 40. | <b>Consignment</b>     | Consignment means "the act of delivering goods to a carrier to be transmitted to a designated agent."  |
|     | <b>Consignation</b>    | Consignation means, "the act of formally paying over money, as into a bank, or to a person legally appointed to receive it, often because it is the subject of a dispute."             |
| 41. | <b>Contagious</b>      | A contagious disease is communicable by contact or touch, as Eczema; Leprosy etc.  |
|     | <b>Infectious</b>      | An infectious disease spread by contact with the germs, e.g., in air or water, as plague (air) cholera and typhoid (water) some contagious diseases are not infectious and vice-versa. |
| 42. | <b>Contemporary</b>    | Contemporary indicates modern, contemporary with us.   |
|     | <b>Contemporaneous</b> | Contemporaneous is usually used of actions or things.  |
| 43. | <b>Contemptible</b>    | Contemptible means worthy of contempt, despicable.   |
|     | <b>Contemptuous</b>    | Contemptuous means worthy of contempt or scorn.  |
| 44. | <b>Continual</b>       | Continual means frequently recurring   |
|     | <b>Continuous</b>      | Continuous means occurring without interruption.   |

|     |                       |   |
|-----|-----------------------|---|
|     |                       | e.g., continuous use, in reference to a roadway, etc.,  |
| 45. | <b>Coarse</b>         | Coarse is rough, vulgar; as coarse cloth, coarse manner; coarse (obscene) book.                                   |
|     | <b>Course</b>         | Course means race course (ground); evil course (behaviour); course of studies or lectures; or in due course; etc. |
| 46. | <b>Contravene</b>     | Contravene means to transgress, infringe; to defy or to be contrary to, come in conflict with                     |
|     | <b>Controvert</b>     | Controvert means to dispute or contest; to debate; to contend against or oppose in argument,                      |
| 47. | <b>Contributory</b>   | Contributory means making contribution; that contributes to a common fund;  |
|     | <b>Contributive</b>   | Contributive having the power of contributing; conducive (exercise is contributive to health).                    |
|     | <b>Contributorial</b> | Contributorial relates to a contributor.  |
|     | <b>Contributional</b> | Contributional relates to a contribution.   |
| 48. | <b>Contumacious</b>   | Contumacious means wilfully disobedient of a court order.   |
|     | <b>Contemptuous</b>   | Contemptuous means showing contempt; scornful.  |
| 49. | <b>Contumacity</b>    | Contumacy is a particular kind of contempt of court and contumacity is a long needless variant of contumacy       |
|     | <b>Contumely</b>      | Contumely means rude and haughty language   |
| 50. | <b>Corporal</b>       | Corporal means of or affecting human body.  |
|     | <b>Corporeal</b>      | Corporeal means having a physical material body and   |
| 51. | <b>Corespondent</b>   | Corespondent is a man charged with adultery and proceeded against together with wife or respondent;               |
|     | <b>Correspondent</b>  | A correspondent is a letter-writer, an on-location news gatherer or a business representative.                    |
| 52. | <b>Corrigendum</b>    | Corrigendum means correction  |
|     | <b>Erratum</b>        | Erratum means error   |
| 53. | <b>Corps</b>          | Corps means singular and plural both; a division of any army, National Cadet                                      |
|     | <b>Corpse</b>         | Corpse means a dead body  |
| 54. | <b>Council</b>        | Council means an advisory or a deliberative body as Privy Council, the Council of State; the Executive Council.   |
|     | <b>Counsel</b>        | Counsel means advice, advocate, barrister; as verb, it means to advice.   |
| 55. | <b>Credible</b>       | Credible means worthy of credence or believable.  |
|     | <b>Credulous</b>      | Credulous means tending to believe.   |

|     |                     |   |
|-----|---------------------|---|
|     | <b>Creditable</b>   | Creditable means worthy of credit, laudable.  |
| 56. | <b>Crevice</b>      | A Crevice is a narrow crack or break, as in a side walk or a wall.                      |
|     | <b>Crevasse</b>     | A crevasse is a large split or rupture, as in a levee, glacier, or embankment;          |
| 57. | <b>Cultured</b>     | Correctly cultured is used of a person  |
|     | <b>Cultivated</b>   | Cultivated is used of the mind. A cultivated mind is well trained and highly developed. |
| 58. | <b>Cursory</b>      | Cursory means perfunctory; superficial.   |
|     | <b>Cursorial</b>    | Cursorial means pertaining to running.  |
| 59. | <b>Dairy</b>        | Dairy is a place where milk, cheese, butter etc, are kept or sold.                      |
|     | <b>Diary</b>        | Diary is a journal for recording daily memoranded                                       |
| 60. | <b>Debauch</b>      | Debauch means "to defile, to seduce away from virtue, to corrupt".                      |
|     | <b>Debouch</b>      | Debouch means 'to emerge or cause to emerge', "to come out into open ground."           |
| 61. | <b>Debility</b>     | Debility means weakness; feebleness etc.  |
|     | <b>Debilitation</b> | Debilitation means the action of making weak of feeble.                                 |
| 62. | <b>Declaim</b>      | Declaim is done by lawyers in court.  |
|     | <b>Disclaim</b>     | Disclaim is done by manufacturers in warranties.  |
| 63. | <b>Decry</b>        | Decry means to disapprove of, to disparage.   |
|     | <b>Descry</b>       | Descry means to see in the distance, to discern with the eye                            |
| 64. | <b>Deduce</b>       | Deduce means "to infer"   |
|     | <b>Deduct</b>       | Deduct means "to subtract"  |
| 65. | <b>Deducible</b>    | Deducible means "inferable",  |
|     | <b>Deductible</b>   | Deductible, means "capable of being (usually lawfully) subtracted."                     |
| 66. | <b>Defective</b>    | Defective means faulty, imperfect, subnormal.   |
|     | <b>Detectible</b>   | Detectible means likely to fail or become defective                                     |
|     | <b>Deficient</b>    | Deficient means insufficient, lacking in quantity.                                      |
| 67. | <b>Defer</b>        | Defer means "to postpone".  |
|     | <b>Defer to</b>     | Defer to means "to give way", yields the toot deference.                                |
| 68. | <b>Definite</b>     | Definite means fixed, exact, explicit.  |
|     | <b>Definitive</b>   | Definitive means authoritative; conclusive; exhaustive; providing it final solution.    |
| 69. | <b>Deliberate</b>   | Deliberate means intentional, fully considered  |
|     | <b>Deliberative</b> | Deliberative means appointed for the purpose of, deliberation or debate.                |

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| 70. | <b>Delivery</b>    | Delivery means to transfer or conveyance something; utterance  |
|     | <b>Deliverance</b> | Deliverance means "rescue, release",   |
| 71. | <b>Delusive</b>    | Delusive means tending to delude   |
|     | <b>Delusional</b>  | Delusional applies in the nature of delusion   |
| 72. | <b>Dependent</b>   | Dependent (adj.) means depending on another for maintenance.   |
|     | <b>Dependant</b>   | Dependant (noun) is one who depends on another for maintenance   |
| 73. | <b>Deportation</b> | Deportation means the act of removing (a person) to another country; the expulsion of an alien from a country. |
|     | <b>Deportment</b>  | Deportment means the bearing, demeanor, or manners of a person.  |
| 74. | <b>Depone</b>      | Depone means to testify.   |
|     | <b>Depose</b>      | Depose means to bear witness or testify or to take deposition of some one.                                     |
| 75. | <b>Depravity</b>   | Depravity shows the condition of being depraved or corrupt.  |
|     | <b>Depravation</b> | Depravation is the act or process of depraving or corrupting.  |
| 76. | <b>Depositary</b>  | Depositary means a person with whom one deposits something, a custodian. a trustee like depositary bank        |
|     | <b>Depository</b>  | Depository is store house, a place where you deposit something. It is used for places.                         |
| 77. | <b>Depreciate</b>  | Depreciate means "to belittle, disparage".   |
|     | <b>Deprecate</b>   | Deprecate means to disapprove regretfully  |
| 78. | <b>Deprivation</b> | Deprivation the damaging lack of material benefits considered to be basic necessities in a society             |
|     | <b>Privation</b>   | Privation means the loss or absence of a quality or attribute that is normally present.                        |
| 79. | <b>Depute</b>      | Depute means to delegate.  |
|     | <b>Deputize</b>    | Deputize means to make another one's deputy or to act as deputy.   |
| 80. | <b>Derisive</b>    | Derisive means scoffing; expressing derision.  |
|     | <b>Derisory</b>    | Derisory means worthy of derision or of being scoffed at.  |
| 81. | <b>Desirable</b>   | Desirable means wished for as being an attractive, useful, or necessary course of action.                      |
|     | <b>Desirous</b>    | Desirous is used in reference to people's emotions.  |
| 82. | <b>Desert</b>      | Desert is a sandy waste like Sahara, Thar etc.   |

|     |                       |  |
|-----|-----------------------|--|
|     | <b>Dessert</b>        | Dessert is the last course of a dinner and consists of fruits, sweat meats etc.                                    |
| 83. | <b>Deterrent</b>      | A deterrent is that which deters.  |
|     | <b>Deterrence</b>     | Deterrence is preventing by fear.  |
|     | <b>Determent</b>      | Determent means the act or fact of deterring.  |
| 84. | <b>Detinuit</b>       | Detinuit means an action of replevin in which the plaintiff already possesses the goods for which he sues.         |
|     | <b>Detinet</b>        | Detinet means an action alleging simply that the defendant is wrongfully withholding money or chattels.            |
| 85. | <b>Devastavit</b>     | Devastavit means the failure of a personal representative to administer a descendent; estate promptly or property. |
|     | <b>Devisavit</b>      | Devisavit is invariably used in the phrase devisavit vel non (he devises or not)                                   |
| 86. | <b>Deviser</b>        | A deviser is one who invents or contrives.   |
|     | <b>Devisor</b>        | A devisor is one who disposes property at will.  |
|     | <b>Divisor</b>        | Divisor is a mathematical term referring to the number, by which another number is divided                         |
| 87. | <b>Devisibility</b>   | Devisibility means the capability of being devised or bequeathed   |
|     | <b>Divisibility</b>   | Divisibility means the capability of being divided.<br>89.   |
| 88. | <b>Diagnosis</b>      | A diagnosis is any analysis of one's present bodily condition with reference to disease or disorder.               |
|     | <b>Prognosis</b>      | A prognosis is the projected future of a present diseases or disorder.   |
| 89. | <b>Dialogue</b>       | Dialogue means a conversation between two or more persons; or the exchange of ideas                                |
|     | <b>Duologue</b>       | Duologue means "a conversation between two persons only  |
| 90. | <b>Disburse</b>       | Disburse is used only in reference to distribution of money.   |
|     | <b>Disperse</b>       | Disperse is used in reference to distribution of all other things, such as crowd or diseases.                      |
| 91. | <b>Discrete</b>       | Discrete means separate, distinct.   |
|     | <b>Discreet</b>       | Discreet means cautious, judicious.  |
| 92. | <b>Discriminatory</b> | Discriminatory means applying discrimination in treatment, especially on ethnic ground.                            |
|     | <b>Discriminative</b> | Discriminative is ambiguous and is a needless  |

|      |                       |  |
|------|-----------------------|--|
|      |                       | variation of both discriminatory and discriminating                  |
|      | <b>Discriminating</b> | Discriminating means keen, discerning, judicious                     |
|      | <b>Discriminant</b>   | Discriminant is a needless variant of discriminating                 |
| 93.  | <b>Disincentive</b>   | Disincentive provides an incentive not to do something.              |
|      | <b>Non-incentive</b>  | Non-incentive is no incentive at all.                                |
| 94.  | <b>Disinterested</b>  | Disinterest means impartiality or freedom from bias                  |
|      | <b>Uninterested</b>   | Uninterested means "lack of interest" or "having no interest."       |
| 95.  | <b>Disorganized</b>   | Disorganized means in confusion or disarray; broken up.              |
|      | <b>Unorganized</b>    | Unorganized means "not organized"                                    |
| 96.  | <b>Disposal</b>       | Disposal means the action or process of getting rid of something.    |
|      | <b>Disposition</b>    | Disposition connotes a preconceived plan and an orderly arrangement  |
| 97.  | <b>Disqualified</b>   | Disqualified means disabled, debarred.                               |
|      | <b>Unqualified</b>    | Unqualified means not meeting the requirements.                      |
| 98.  | <b>Dissemble</b>      | Dissemble means "to present a false appearance"                      |
|      | <b>Disassemble</b>    | Disassemble means "take apart"                                       |
| 99.  | <b>Dissent</b>        | Dissent refers to a difference of opinion                            |
|      | <b>Dissension</b>     | Dissension refers to contentious or partisan arguing                 |
| 100. | <b>Dissentient</b>    | Dissentient means in opposition to a majority or official opinion.   |
|      | <b>Dissentious</b>    | Dissentious means given to dissension; quarrelsome                   |
| 101. | <b>Distinct</b>       | Distinct means well defined; discernibly separate                    |
|      | <b>Distinctive</b>    | Distinctive means serving to distinguish, set all by appearance      |
| 102. | <b>Divers</b>         | Divers implies severalty, various, sundry.                           |
|      | <b>Diverse</b>        | Diverse implies difference. It means marked by different; unlike.    |
| 103. | <b>Doctrinal</b>      | Doctrinal means of or relating to a doctrine.                        |
|      | <b>Doctrinaire</b>    | Doctrinaire means dogmatic; impractically adhering to dogma.         |
| 104. | <b>Dominance</b>      | Dominance express the fact or position of being dominant             |
|      | <b>Domination</b>     | Domination means the exercise of ruling power                        |
| 105. | <b>Economic</b>       | Economic refers to the study of economics                            |
|      | <b>Economical</b>     | Economical means 'thrifty' or in the current Jargon "cost-effective" |
| 106. | <b>Educational</b>    | Educational means having to do with education                        |

|      |                                  |   |
|------|----------------------------------|---|
|      | <b>Educative</b>                 | Educative means tending to educate; instructive   |
|      | <b>Educatory</b>                 | Educatory is a needless variant of educative  |
|      | <b>Educable</b>                  | Educable means capable of being educated  |
| 107. | <b>Educible</b>                  | Educible means capable of being educed, or drawn out.   |
|      | <b>Educable</b>                  | Educable means capable of being educated.   |
| 108. | <b>Effective</b>                 | Effective means having a high degree of effect, powerful, striking  |
|      | <b>Effectual</b>                 | Effectual means producing desired result.   |
|      | <b>Efficacious</b>               | Efficacious means to have desired effect.   |
|      | <b>Efficient</b>                 | Efficient increasingly has economic connotations in law that are evident  |
| 109. | <b>Egress</b>                    | Egress means the right or liberty of going out (leave)  |
|      | <b>Ingress</b>                   | Ingress means the right or liberty of going in (enter)  |
|      | <b>Regress</b>                   | Regress means right or liberty to re-enter.   |
| 110. | <b>Elemental</b>                 | Elemental means "of or relating to the elements of something; essential; primal or primitive                                  |
|      | <b>Elementary</b>                | Elementary means introductory, rudimentary; simple; fundamental.  |
| 111. | <b>Elocution</b>                 | Elocution means style in speaking: the art of speaking persuasively   |
|      | <b>Locution</b>                  | Locution means a word or phrase.  |
| 112. | <b>Eligible</b>                  | Eligible means legally qualified for selection.   |
|      | <b>Illegible</b>                 | Illegible means incapable of being read.  |
| 113. | <b>Emigrant</b>                  | Emigrant is one who goes out of his country to settle in another country.   |
|      | <b>Immigrant</b>                 | Immigrant is one who comes into a foreign country to settle there   |
| 114. | <b>Eminent</b>                   | Eminent means great, distinguished  |
|      | <b>Imminent</b>                  | Imminent means impending, threatening to occur immediately  |
| 115. | <b>Empanel</b><br><b>Impanel</b> | Empanel and Impanel have the same meaning. It means to put name on panel of jury  |
| 116. | <b>Empathy</b>                   | Empathy is the ability to imagine oneself in another person's position and to experience all the sensations connected with it |
|      | <b>Sympathy</b>                  | Sympathy is compassion for or commiseration with another  |
| 117. | <b>Emulate</b>                   | Emulate means to strike to equal or rival, to copy or imitate with the object of equalling                                    |
|      | <b>Immolate</b>                  | Immolate is to kill as a sacrifice  |

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| 118. | <b>Envisage</b>      | Envisage means to contemplate or view in a certain way   |
|      | <b>Envision</b>      | Envision means to picture to oneself   |
| 119. | <b>Equitable</b>     | Equitable derives from equity and has associations of justice and fairness or that which can be sustained in a court of equity |
|      | <b>Equable</b>       | Equable means even; tranquil; level.   |
| 120. | <b>Eruption</b>      | Eruption is breaking out like volcanic eruption, eruption of war, revolution or disease etc.                                   |
|      | <b>Irruption</b>     | Irruption means sudden and violent entry into a country of an invader in large numbers.  |
| 121. | <b>Especial</b>      | Especial means distinctive, significant, peculiar  |
|      | <b>Special</b>       | Special means specific, particular   |
| 122. | <b>Ethics</b>        | Ethics relates to the field of moral science.  |
|      | <b>Ethos</b>         | Ethos means the characteristic spirit or beliefs of a community, people, system, or person.                                    |
| 123. | <b>Euphuism</b>      | Euphuism is the name given to highly affected and elaborate style.   |
|      | <b>Euphemism</b>     | Euphemism is a mild or vague expression in place of a harsh and blunt one, as stout for fat, in exactitude for falsehood.      |
| 124. | <b>Exalt</b>         | Exalt means to raise in rank, place in a high position or extol  |
|      | <b>Exult</b>         | Exult means is to rejoice exceedingly  |
| 125. | <b>Exceptionable</b> | Exceptionable means open to exception and objectionable  |
|      | <b>Exceptional</b>   | Exceptional means out of the ordinary; uncommon; rare; superior.   |
| 126. | <b>Excercise</b>     | Excercise is familiar enough in physical exercise, mental exercise.  |
|      | <b>Exorcise</b>      | Exorcise means to drive out an evil spirit by prayers.   |
| 127. | <b>Exlex</b>         | Exlex is an adjective meaning "outside the law; without legal authority"   |
|      | <b>Ex ege</b>        | Ex ege is an adverb meaning "as a matter of law"   |
| 128. | <b>Exhausting</b>    | Exhausting is draining all one's energy, tiring.   |
|      | <b>Exhaustive</b>    | Exhaustive is comprehensive or leaving out nothing of a subject.   |
| 129. | <b>Expatriate</b>    | Expatriate means to wander; or to discourse on at length   |
|      | <b>Expatriate</b>    | Expatriate means to leave one's home country to live elsewhere; or to banish or exile.   |

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| 130. | <b>Facility</b>     | Facility means ease, the quality of being easily done.  |
|      | <b>Felicity</b>     | Felicity means happiness or blessedness.  |
| 131. | <b>Factious</b>     | Factious is related to faction or party and means turbulent.  |
|      | <b>Factitious</b>   | Factitious means made up, false, artificial. It is indicative of man-made and not natural;  |
|      | <b>Fictitious</b>   | Fictitious means imaginary, not real.   |
| 132. | <b>Fair</b>         | Fair means a gathering to celebrate a holiday or a market held at stated time.  |
|      | <b>Fare</b>         | Fare means price for conveyance by land, water or air.  |
| 133. | <b>Forceful</b>     | Forceful means full of force, powerful, convincing.   |
|      | <b>Forcible</b>     | Forcible means “effected by force against resistance.”  |
| 134. | <b>Foul</b>         | Foul is the opposite of fair i.e., unfair and use familiarly in foul play   |
|      | <b>Fowl</b>         | Fowl formerly meant a bird, but now is restricted to cock or hen.   |
| 135. | <b>Garnish</b>      | Garnish means to take property; usually a portion of someone's salary, by legal authority.  |
|      | <b>Garnishee</b>    | Garnishee is usually reserved for the nominal sense.  |
| 136. | <b>Generative</b>   | Generative means procreative.   |
|      | <b>Generational</b> | Generational means relating to generations.   |
| 137. | <b>Gibe</b>         | Gibe means a caustic remark or taunt  |
|      | <b>Jibe</b>         | Jibe means to make things fit, uniform, or consistent.  |
| 138. | <b>Gilt</b>         | Gilt means covered with a thin layer of gold as gilt edged paper; such as gilt-edged securities.                                  |
|      | <b>Guilt</b>        | Guilt means crime, offence, neglect of duty.  |
| 139. | <b>Gratuitous</b>   | Gratuitous means done or performed without obligation to do so (gratuitous promises); done unnecessarily (gratuitous criticisms). |
|      | <b>Fortuitous</b>   | Fortuitous means occurring by chance (fortuitous circumstances):  |
| 140. | <b>Hoard</b>        | Hoard means a store or treasure.  |
|      | <b>Horde</b>        | Horde is a contemptuous expression for gong, or mob.  |
| 141. | <b>Human</b>        | Human pertaining to human being   |
|      | <b>Humane</b>       | Humane means kind or compassionate.   |
|      | <b>Humanitarian</b> | Humanitarian is one who is full of sympathy for all living things   |

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| 142. | <b>Humanism</b>    | Humanism indicates study in human as opposed to divine interests.  |
|      | <b>Humanities</b>  | Humanities was the name given to Roman and Greek classics (comprising literature, philosophy, history, oratory etc.).                        |
|      | <b>Humanist</b>    | Humanist means the students of these classics.   |
| 143. | <b>Illegible</b>   | Illegible means not plain or clear enough to be read.  |
|      | <b>Unreadable</b>  | Unreadable means too dull or obfuscatory to be read (used of bad writings)   |
| 144. | <b>Illusion</b>    | An illusion exists in one's fancy or imagination.  |
|      | <b>Delusion</b>    | A delusion is an idea or thing that deceives, or misleads a person.  |
| 145. | <b>Imaginary</b>   | Imaginary is non-existent, fabricated by imagination.  |
|      | <b>Imaginative</b> | Imaginative is having the creative faculty of imagination.   |
| 146. | <b>Immoral</b>     | Immoral means "evil depraved".   |
|      | <b>Unmoral</b>     | Unmoral means merely "without moral sense, not moral, and is used, for example, of animals and inanimate objects.                            |
| 147. | <b>Impartable</b>  | Impartable means capable of being imparted.  |
|      | <b>Impartible</b>  | Impartible means indivisible.  |
| 148. | <b>Impassible</b>  | Impassible means incapable of feeling or suffering.  |
|      | <b>Impassable</b>  | Impassable means not capable of being passed.  |
| 149. | <b>Imperial</b>    | Imperial means of or belonging to an emperor or empire.  |
|      | <b>Imperious</b>   | Imperious means overbearing; supercilious, tyrannical. Additionally it means urgent; absolute and imperative.                                |
| 150. | <b>Imprudent</b>   | Imprudent means rash, indiscreet.  |
|      | <b>Impudent</b>    | Impudent means insolently disrespectful shamelessly presumptuous   |
| 151. | <b>Incipient</b>   | Incipient means "beginning in an initigstage."   |
|      | <b>Insipient</b>   | Insipient is an obsolete word meaning unwise and foolish.  |
| 152. | <b>Incredible</b>  | Incredible means not believable.   |
|      | <b>Incredulous</b> | Incredulous means skeptical.   |
| 153. | <b>Ingenuous</b>   | Ingenuous means clever, having ingenuity.  |
|      | <b>Ingenuous</b>   | Ingenuous means honest, frank.   |
| 154. | <b>Insidious</b>   | Insidious means things or persons lying in wait or seeking to entrap on ensnare, operating subtly or secretly so to not to excite suspicion. |

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|      | <b>Invidious</b>          | Invidious means offensive; entailing odium or ill will upon the person performing, discharging or discussing; giving offense to others.                |
| 155. | <b>Insoluble</b>          | Insoluble is used both for substances that will not dissolve in liquids and of problems that cannot be solved  |
|      | <b>Insolvable</b>         | Insolvable is used only of problems that cannot be solved.   |
|      | <b>Unsolvable</b>         | Unsolvable is needless variant and therefore should be avoided.  |
| 156. | <b>Interpretivism</b>     | Interpretivism means a plea that judges can enforce only norms stated or clearly implicit in the Constitution  |
|      | <b>Non-Interpretivism</b> | Non-Interpretivism mean the view that courts can legitimately go beyond those sources.   |
| 157. | <b>Innovation</b>         | Innovation is novelty, something new.  |
|      | <b>Renovation</b>         | Renovation is indicative of making a new again.  |
| 158. | <b>Judgmental</b>         | Judgmental means of or relating to judgment; or judging when uncalled for.   |
|      | <b>Judgmatic</b>          | Judgmatic means facetious formation  |
| 159. | <b>Judicial</b>           | Judicial means<br>(1) of or relating to court or by the court<br>(2) in court (judicial admission);<br>(3) legal;<br>(4) of or relining to a judgment. |
|      | <b>Judicious</b>          | Judicious means well considered; discreet; wisely circumspect.   |
| 160. | <b>Jural</b>              | Jural means of or relating to law or its administration; legal : juristic; or of or pertaining to rights or obligations                                |
|      | <b>Juridical</b>          | Juridical means relating to judicial proceedings or to the law   |
| 161. | <b>Juratory</b>           | Juratory is a rare term used today to mean of or pertaining to an oath or oaths; expressed or contained in an oath.                                    |
|      | <b>Juratorial</b>         | Juratorial means "of or relating to a jury."   |
| 162. | <b>Jurisprudent</b>       | Jurisprudent means a jurist or learned lawyer.   |
|      | <b>Jurisprudential</b>    | Jurisprudential means "of or relating to jurisprudence".   |
| 163. | <b>Justiciable</b>        | Justiciable means liable to be determined in a court of justice.   |
|      | <b>Judicable</b>          | Judicable is a needless variant.   |

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| 164. | <b>Levee</b>              | Levee means a river embankment; alike; pier.   |
|      | <b>Levy</b>               | Levy means (i) to impose (as a fine) by legal sanction, (ii) to conscript For service in military; (iii) to wage (a war); (4) to seize (the property). |
| 165. | <b>Lightning</b>          | Lightning means thunderbolt.   |
|      | <b>Lightening</b>         | Lightening means (i) shining, brightening or making bright, illuminating; (ii) making (lighter, reducing weight or burden; giving or feeling relief.   |
| 166. | <b>Loath</b>              | Loath means reluctant, unwilling.  |
|      | <b>Loathe</b>             | Loathe means to detest, to hate intensely.   |
| 167. | <b>Lost Property</b>      | Property is said to be lost when the owner has involuntarily relinquished possession of it, usually by accident or forgetfulness                       |
|      | <b>Abandoned Property</b> | Property is abandoned if the owner has knowingly forsaken his interest in the property.  |
| 168. | <b>Lose</b>               | Lose means to suffer the deprivation of; to part with;   |
|      | <b>Loose</b>              | Loose means to release; unbind; as he loosed the dog.  |
| 169. | <b>Luxuriant</b>          | Luxuriant means growing abundantly, lush.  |
|      | <b>Luxurious</b>          | Luxurious means characterized by luxury or sensuous enjoyment.   |
| 170. | <b>Malevolent</b>         | Malevolent is a person 'desirous of evil to others.'   |
|      | <b>Maleficent</b>         | Maleficent is a person who is positively "hurtful or criminal to others.   |
| 171. | <b>Malfeasance</b>        | Malfeasance means an unlawful act.   |
|      | <b>Misfeasance</b>        | Misfeasance means the negligent or otherwise improper performance of lawful act.   |
| 172. | <b>Malignancy</b>         | Malignancy should be confined to denoting any cancerous disease.   |
|      | <b>Malignity</b>          | Malignity means wicked or deep rooted ill will or hatred; malignant feelings or actions.   |
| 173. | <b>Mean</b>               | Mean means (i) small; (ii) obstreperous; or (iii) median - average.  |
|      | <b>Median</b>             | The median is the 'point in a series of numbers above which is half the series and below which is the other half.                                      |
| 174. | <b>Mean</b>               | Mean means average.  |
|      | <b>Mien</b>               | Mien means general manner, demeanour, appearance, bearing or behaviour of a person   |
| 175. | <b>Mistreat</b>           | Mistreat means to treat badly or wrongly.  |
|      | <b>Maltreat</b>           | Maltreat mean to abuse, to handle roughly or   |

|      |                           |   |
|------|---------------------------|---|
|      |                           | cruelly.  |
| 176. | <b>Mitigate</b>           | Mitigate means to take less severe or intense.  |
|      | <b>Militate</b>           | Militate means to exert a strong influence.   |
| 177. | <b>Momentary</b>          | Momentary means lasting a moment, short lived, fleeting; as momentary feeling of despair, relief, momentary pleasure. |
|      | <b>Momentous</b>          | Momentous means of great importance or significance.  |
| 178. | <b>Non-Constitutional</b> | Non-Constitutional means a issue relating to some legal basis or principle other than the Constitution.               |
|      | <b>Unconstitutional</b>   | Unconstitutional means in violation of or not in accordance with principles enshrined in the Constitution.            |
| 179. | <b>Non feasance</b>       | Non feasance implies the failure to act where a duty to act existed   |
|      | <b>Non act</b>            | Non act means merely the failure to act   |
| 180. | <b>Observation</b>        | Observation is the act of observing i.e., seeing, marking, examining alternatively, also a remark.                    |
|      | <b>Observance</b>         | Observance is obeying of a rule, keeping a custom or performing a ceremony.   |
| 181. | <b>Official</b>           | Official means pertaining to office.  |
|      | <b>Officious</b>          | Officious means servile, fussy in offering unwanted service.  |
| 182. | <b>Ordance</b>            | Ordance means military supplies, cannon; artillery.   |
|      | <b>Ordinance</b>          | Ordinance means a rule or law made to meet some emergent situation.   |
|      | <b>Ordonnance</b>         | Ordonnance means the ordering of parts in a whole; arrangement.   |
| 183. | <b>Persecute</b>          | Persecute means to harass.  |
|      | <b>Prosecute</b>          | Prosecute means (i) to take legal proceedings against a person, (ii) to pursue or carry on study,                     |
| 184. | <b>Personal</b>           | Personal is one's own, private, individual  |
|      | <b>Personnel</b>          | Personnel is used collectively for a body of persons engaged in any service or institution                            |
| 185. | <b>Perspicuity</b>        | Perspicuity is the quality of clear statement and is used of books, style, writing                                    |
|      | <b>Perspacity</b>         | Perspacity is the quality of clear, sharp understanding or penetration and is used of persons                         |
|      | <b>Perspicuous</b>        | Perspicuous means clear; lucid; seen readily  |
|      | <b>Perspicious</b>        | Perspicious means penetrating in thought: acutely discerning; keen, shrewd  |
| 186. | <b>Practical</b>          | Practical means manifested in practice; capable of  |

|      |                         |   |
|------|-------------------------|---|
|      |                         | being put to good use.  |
|      | <b>Practicable</b>      | Practicable means capable of being accomplished; feasible, possible.  |
| 187. | <b>Pray</b>             | Pray means to offer prayer  |
|      | <b>Prey</b>             | Prey means victim   |
| 188. | <b>Precautionary</b>    | Precautionary means (i) suggesting or advising provident caution; (ii) of, relating to, or of the nature of a precaution.           |
|      | <b>Precautions</b>      | Precautions means using precaution; displaying previous or provident caution or care.   |
| 189. | <b>Precede</b>          | Precede means to go ahead of; to come before.   |
|      | <b>Proceed</b>          | Proceed means to go ahead; to continue.   |
| 190. | <b>Precision</b>        | Precision means accuracy.   |
|      | <b>Precisian</b>        | Precisian means a person who adheres to rigidly high standards  |
|      | <b>Precisionist</b>     | Precisionist means a person who prizes absolute correctness of expression and performance   |
| 191. | <b>Precipitate</b>      | Precipitate means sudden; hasty; rash; showing violent or uncontrollable speed.   |
|      | <b>Precipitous</b>      | Precipitous is like a precipice; steep.   |
| 192. | <b>Presumptive</b>      | Presumptive means giving reasonable grounds for presumption or belief; warranting inferences; or based on presumption or inference. |
|      | <b>Presumptuous</b>     | Presumptuous means arrogant, presuming, bold, forward, impudent.  |
| 193. | <b>Presumptively</b>    | Presumptively means by legal presumption  |
|      | <b>Presumably</b>       | Presumably means may presume or reasonably suppose; by presumption or supposition.  |
| 194. | <b>Principal</b>        | Principal is the head of the institution  |
|      | <b>Principle</b>        | Principle means a truth, law, doctrine or course of action  |
| 195. | <b>Prophecy</b>         | Prophecy means to predict or foretell.  |
|      | <b>Prophecy</b>         | Prophecy means a prediction or foretelling  |
| 196. | <b>Proscribe</b>        | Proscribe means to prohibit   |
|      | <b>Prescribe</b>        | Prescribe means to impose authoritatively   |
| 197. | <b>Quaere</b>           | Quaere means "question".  |
|      | <b>Query</b>            | Query means to enquire.   |
| 198. | <b>Quantum Meruit</b>   | Quantum Meruit means the reasonable value of the services as quasi-contract. Literally it means "as much as he deserved."           |
|      | <b>Quantum Valebant</b> | Quantum Valebant means the reasonable value of goods and materials.   |

|      |                       |  |
|------|-----------------------|--|
| 199. | <b>Recital</b>        | Recital means the formal statement, or setting forth, of some related matter of fact in any deed or writing,   |
|      | <b>Recitation</b>     | Recitation connotes an oral delivery before an audience, whether in the classroom or an stage.   |
| 200. | <b>Recognizance</b>   | Recognizance means a bond or obligation, entered into and recorded before a court or a magistrate, by which a person engages himself to perform some act or observe some condition (as to appear when called on, to pay a debt or to keep the peace) |
|      | <b>Reconnaissance</b> | Reconnaissance means a preliminary survey, a military or intelligence gathering examination of a region.   |
|      | <b>Reconnoisance</b>  | Reconnoisance is the older spelling of reconnaissance, it is also a needless variant of recognizance and of recognition  |
| 201. | <b>Recourse</b>       | Recourse means application and is used in idiomatic phrases without recourse and have recourse to.   |
|      | <b>Resort</b>         | Resort means that which one turns to for refuge or aid   |
| 202. | <b>Rejoinder</b>      | A rejoinder is the pleading served by a defendant in answer to the plaintiff's reply   |
|      | <b>Surrejoinder</b>   | Surrejoinder is a plaintiff's pleading in reply to a defendant's rejoinder   |
| 203. | <b>Remainder</b>      | A remainder is defined as `what is left' of an entire grant of lands or tenements after the preceding part of the some grant or estate has been disposed of in possession, whose regular expiration the remainder must await                         |
|      | <b>Reversion</b>      | A reversion is the remnant of an estate continuing in the grantor, undisposed of, after the grant of a party of his interest."   |
| 204. | <b>Remediable</b>     | Remediable means capable of being remedied   |
|      | <b>Remedial</b>       | Remedial means providing a remedy; corrective; curative  |
| 205. | <b>Remittance</b>     | Remission means either forgiveness or diminution of force, effect, degree, or violence.  |
|      | <b>Remittal</b>       | Remittal is a needless variant.  |
|      | <b>Remission</b>      | Remittance correspondence to transmit (as money) and means "money sent to a person or the sending of money to a person.  |

|      |                    |   |
|------|--------------------|---|
|      | <b>Remitment</b>   | Remitment is a needless variant.  |
| 206. | <b>Remitter</b>    | A remitter is one who sends a remittance  |
|      | <b>Remittitur</b>  | A remittitur is the process by which the court reduces the damages awarded in a jury verdict.   |
| 207. | <b>Reprise</b>     | Reprise means (i) an annual deduction, duty, or payment out of manor or estate; as an annuity or the like; or (ii) (in music) a repetition.   |
|      | <b>Reprisal</b>    | Reprisal means an act of retaliation, usually, of one nation against another but short of war.  |
| 208. | <b>Rescission</b>  | Rescission means an act of rescinding; annulling; vacating, or cancelling   |
|      | <b>Recision</b>    | Recision comes from the Latin verb recisio meaning "the cut back, lop off".   |
| 209. | <b>Revalidate</b>  | Revalidation consists in repetition of the formalities of execution of the will previously revoked.   |
|      | <b>Revive</b>      | Revival consists in revocation of the superseding or revoking will i.e., the will that is displaced or invalidated the original will.   |
| 210. | <b>Right</b>       | Right means correct, proper, just etc.  |
|      | <b>Righteous</b>   | Righteous means morally upright, virtuous or law-abiding  |
|      | <b>Rightful</b>    | Rightful means (i) (of an action) equitable; fair (ii) (of a person) legitimately entitled to a position (the rightful heir); or (iii) (of an office or piece of property) that one is entitled to (his rightful inheritance).  |
| 211. | <b>Sanitary</b>    | Sanitary means of or relating to health or more usually, cleanliness.   |
|      | <b>Sanative</b>    | Sanative means health-producing; healthful.   |
|      | <b>Sanatory</b>    | Sanatory is a needless variant  |
| 212. | <b>Savable</b>     | Savable means capable of being saved.   |
|      | <b>Salvable</b>    | Salvable means admitting of salvation.  |
|      | <b>Salvageable</b> | Salvageable means "that can be salvaged."   |
| 213. | <b>Scarify</b>     | Scarify means (i) "to make superficial incisions in, cut off skin from". (ii) "to pain by severe criticism"; or (iii) "to loosen soil by means of an agricultural machine (a sacrificer) with prongs for spiked road breaking". |
|      | <b>Scorify</b>     | Scorify means "to reduce or to dross or slag."  |
| 214. | <b>Sensuous</b>    | Sensuous means of or relating to five senses or arousing any of the five senses.  |
|      | <b>Sensual</b>     | Sensual means sexual; salacious; voluptuous   |

|      |                      |  |
|------|----------------------|--|
|      |                      | (sexual desires).  |
| 215. | <b>Sequential</b>    | Sequential means "forming a sequence or consequence".  |
|      | <b>Sequacious</b>    | Sequacious means "intellectually servile."   |
| 216. | <b>Sequester</b>     | Sequester means to remove (as property) from the possession of the owner temporarily; to seize and hold the effects of a debtor until the claims of creditors are satisfied.                       |
|      | <b>Sequestrate</b>   | Sequestrate means to divert the income of an estate or benefice, temporally or permanently, from its owner into other hands."  |
| 217. | <b>Sideswipe</b>     | Sideswipe means to strike a glancing blow.   |
|      | <b>Sidewipe</b>      | Sidewipe means an artificial form, has no valid standing.  |
| 218. | <b>Signatory</b>     | Signatory means forming one of those persons or governments whose signatures are attached to a document.   |
|      | <b>Signatural</b>    | Signatural means of or pertaining to signatures.   |
| 219. | <b>Significance</b>  | Significance means (i) a subtly or indirectly conveyed meaning; suggestiveness; the quality of implying; (ii) the quality of being important or significant.                                       |
|      | <b>Signification</b> | Signification means (i) the act of signifying; as by symbols; or (ii) the purport or sense intended to be conveyed by a word or other symbol.  |
| 220. | <b>Sophistical</b>   | Sophistical means "quibbling, specious, or captious in reasoning."   |
|      | <b>Sophical</b>      | Sophical means learned; intellectual.  |
| 221. | <b>Specious</b>      | Specious is used of arguments or reasoning and means having special appeal but false.  |
|      | <b>Spurious</b>      | Spurious is used of things. It means not genuine.  |
| 222. | <b>Stationary</b>    | Stationary means remaining in one place.   |
|      | <b>Stationery</b>    | Stationery means materials for writing on or with.   |
| 223. | <b>Statutable</b>    | Statutable means (i) prescribed, authorised, or permitted by statute; (ii) conformed to the requirements of the statutes as to quality, size, or amount; (iii) (of an offense) legally punishable. |
|      | <b>Statutory</b>     | Statutory means pertaining to or consisting in statutes, enacted, appointed, or created by statute; conformable to the provisions of a statute.  |
| 224. | <b>Staunch</b>       | Staunch is preferable as the adjective i.e., trustworthy, loyal.   |

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|------|------------------|---|
|      | <b>Stanch</b>    | Stanch means to restrain the flow of blood.   |
| 225. | <b>Terminus</b>  | Terminus means the city at the end of a rail road or bus line   |
|      | <b>Terminal</b>  | Terminal means the station of a transportation line   |
| 226. | <b>Timbre</b>    | Timbre is primarily a musical term meaning "tone quality".  |
|      | <b>Timber</b>    | Timber means wood prepared for use in building and carpentry.   |
| 227. | <b>Treble</b>    | Treble means consisting of three parts; threefold.  |
|      | <b>Triple</b>    | Triple means having three times the usual size, quality, or strength.   |
| 228. | <b>Trustee</b>   | Trustee means a person having a nominal title to property that he holds for the benefit of one or more others, the beneficiaries. |
|      | <b>Trusty</b>    | Trusty means trustworthy.   |
| 229. | <b>Turpid</b>    | Turpid means "filthy; worthless".   |
|      | <b>Turbid</b>    | Turbid means muddy, thick; disordered.  |
|      | <b>Torpid</b>    | Torpid means dormant, sluggish, apathetic.  |
| 230. | <b>Urban</b>     | Urban means city or town (as opposed to rural).   |
|      | <b>Urbane</b>    | Urbane means cultured, polite.  |
| 231. | <b>Venal</b>     | Venal means purchasable or for sale;  |
|      | <b>Venial</b>    | Venial means slight (used of sin's); pardonable; excusable; trivial.  |
| 232. | <b>Void</b>      | Void means completely null.   |
|      | <b>Voidable</b>  | Voidable means capable of being voided or confined.   |
| 233. | <b>Vocation</b>  | Vocation is sense of fitness or urge for some particular career or profession.  |
|      | <b>Avocation</b> | Avocation is occupation or profession.  |
| 234. | <b>Wave</b>      | Wave is noun associated with water i.e., wave of the sea means to move  |
|      | <b>Waive</b>     | Waive means to give up the claim; to forgo  |
| 235. | <b>Wrack</b>     | Wrack means to destroy utterly; to wreck.   |
|      | <b>Rack</b>      | Rack means to torture or oppress.   |

\* \* \* \* \*

## 4. Current Affairs

**JUNE 2024**

**1. Who was India's first female permanent representative to the United Nations who has retired?**

- (a) Pranjal Patil
- (b) Shweta Agarwal
- (c) Ruchira Kamboj**
- (d) Srishti Jayant Deshmukh

**2. Which country will host the next annual general meeting of the International Air Transport Association?**

- (a) India**
- (b) China
- (c) USA
- (d) Germany

**3. Recently, which state has received central approval for establishing an IIM?**

- (a) Assam**
- (b) Bihar
- (c) Rajasthan
- (d) Uttar Pradesh

**4. The Chang'e-6 mission was recently sent to the moon by which country?**

- (a) Japan
- (b) China**
- (c) India
- (d) France

**5. When is World Bicycle Day celebrated every year?**

- (a) June 2
- (b) June 3**
- (c) June 4
- (d) June 5

**6. Which country has recently officially launched its space agency?**

- (a) South Korea**
- (b) Brazil
- (c) Pakistan
- (d) Kenya

**7. When is World Environment Day celebrated every year?**

- (a) 3 June
- (b) 4 June
- (c) **5 June**
- (d) 6 June

**8. Which country has recently banned the entry of Israeli passport holders?**

- (a) **Maldives**
- (b) India
- (c) Nepal
- (d) Bhutan

**9. By whom was the mobile app 'Sarathi 2.0' launched recently?**

- (a) Policy Commission
- (b) Home Ministry
- (c) **SEBI**
- (d) SBI

**10. Which state has recently signed an agreement with the World Bank to tackle air pollution?**

- (a) Uttar Pradesh
- (b) Bihar
- (c) Rajasthan
- (d) **Haryana**

**11. Which country has recently officially recognised Palestine as an independent state?**

- (a) Japan
- (b) **Slovenia**
- (c) Portugal
- (d) Argentina

**12. Who has become the first batsman in the world to hit 600 sixes in international cricket?**

- (a) **Rohit Sharma**
- (b) Virat Kohli
- (c) Babar Azam
- (d) Jos Buttler

**13. Recently two wetlands of which state have been included in the list of 'Ramsar Sites'?**

- (a) Bihar
- (b) Uttar Pradesh
- (c) Madhya Pradesh
- (d) Rajasthan

**14. When is World Food Safety Day celebrated every year?**

- (a) 5 June
- (b) 6 June
- (c) 7 June
- (d) 8 June

**15. In which state has Prem Singh Tamang recently taken oath as the Chief Minister?**

- (a) Arunachal Pradesh
- (b) Meghalaya
- (c) Odisha
- (d) Sikkim

**16. Iga Swiatek, who won the French Open 2024 women's title, is a player from which country?**

- (a) France
- (b) USA
- (c) Germany
- (d) Poland

**17. Which country has recently been added by the UN to the global list of criminals committing crimes against children?**

- (a) Israel
- (b) Pakistan
- (c) Iran
- (d) Maldives

**18. Who has been named as the next Chief of the Indian Army?**

- (a) Manoj Pandey
- (b) Anil Chauhan
- (c) Harpreet Singh
- (d) Upendra Dwivedi

**19. Who has been sworn-in as the new Chief Minister of Odisha?**

- (a) Dharmendra Pradhan
- (b) Mohan Charan Majhi

- (c) Naveen Patnaik
- (d) Subrahmanyam Jaishankar

**20. Suhelwa Wildlife Sanctuary is in news recently, it is in which state?**

- (a) Madhya Pradesh
- (b) Rajasthan
- (c) Odisha
- (d) **Uttar Pradesh**

**21. Which country will host the FIH Hockey Men's Junior World Cup 2025?**

- (a) Malaysia
- (b) China
- (c) Denmark
- (d) **India**

**22. Carlos Alcaraz is the player of which country who has won the title of French Open 2024?**

- (a) **Spain**
- (b) France
- (c) Serbia
- (d) Australia

**23. Who has been sworn-in as the new Chief Minister of Andhra Pradesh?**

- (a) **Chandrababu Naidu**
- (b) Pawan Kalyan
- (c) Nara Lokesh
- (d) D Raja

**24. What is India's rank in the Global Gender Gap Index 2024?**

- (a) 120
- (b) 123
- (c) 127
- (d) **129**

**25. Pema Khandu has been sworn in as the Chief Minister of which state?**

- (a) **Arunachal Pradesh**
- (b) Meghalaya
- (c) Sikkim
- (d) Tripura

**26. After whom has the International Astronomical Union named a crater on Mars?**

- (a) **Professor Devendra Lal**
- (b) C. V Raman
- (c) Satyendra Nath Bose
- (d) Vikram Sarabhai

**27. Who recently released the Container Port Performance Index?**

- (a) World Economic Forum
- (b) **World Bank**
- (c) UNESCO
- (d) None of these

**28. NASA is collaborating with which IIT in India to research multidrug-resistant pathogens?**

- (a) IIT Delhi
- (b) **IIT Madras**
- (c) IIT Varanasi
- (d) IIT Mumbai

**29. Where is the G7 summit being held?**

- (a) France
- (b) Japan
- (c) Canada
- (d) **Italy**

**30. Ajit Doval is the longest serving person in which position?**

- (a) Advocate General of India
- (b) Vice Chairman of NITI Aayog
- (c) **National Security Advisor**
- (d) Principal Secretary to the Prime Minister

**31. Who has recently been re-appointed as the Principal Secretary to Prime Minister Narendra Modi?**

- (a) Nripendra Mishra
- (b) **Dr. Pramod Kumar Mishra**
- (c) Pramod Tiwari
- (d) Abhay Kumar Sinha

**32. Who has been selected as the next MD of 'Dedicated Freight Corridor Corporation of India' Limited?**

- (a) Rajeev Kumar
- (b) **Abhishek Singh**

- (c) **Praveen Kumar**
- (d) Abhimanyu Ramachandran

**33. With whom has the Indira Gandhi National Center for the Arts signed an agreement to promote Indian art and culture?**

- (a) Doordarshan
- (b) **Sansad TV**
- (c) Ministry of Tourism
- (d) Policy Commission

**34. When is World Blood Donor Day celebrated every year?**

- (a) 12 June
- (b) 13 June
- (c) **14 June**
- (d) 15 June

**35. Indian Railways completed the first trial run on the world's highest railway bridge, it is on which river?**

- (a) Jhelum
- (b) **Chenab**
- (c) Indus
- (d) Sutlej

**36. Where was the 2nd edition of Exercise 'Red Flag 2024' held in the US?**

- (a) Nellis Air Force Base, Nevada
- (b) **Eielson Air Force Base, Alaska**
- (c) Luke Air Force Base, Arizona
- (d) None of these

**37. Who was re-elected as the President of South Africa by the South African Parliament?**

- (a) Julius Malema
- (b) Jacob Zuma
- (c) **Cyril Ramaphosa**
- (d) Thabo Mbeki

**38. Gandhi Sagar Wildlife Sanctuary was in the news recently, it is located in which state?**

- (a) Rajasthan
- (b) **Madhya Pradesh**
- (c) Punjab
- (d) Bihar

**39. Which two ministries signed an MoU for the Krishi Sakhi Certification Programme?**

- (a) Ministry of Agriculture and Farmers Welfare and Ministry of Rural Development**
- (b) Ministry of Education and Ministry of Agriculture and Farmers Welfare
- (c) Ministry of Rural Development and Ministry of Home Affairs
- (d) Ministry of Rural Development and Ministry of Labour

**40. Who is the first bowler to bowl all four overs maiden in a T20 World Cup match?**

- (a) Jasprit Bumrah
- (b) Shaheen Shah Afridi
- (c) Lockie Ferguson**
- (d) Trend Bolt

**41. Which country will host the first multinational air exercise 'Taranga Shakti'?**

- (a) India**
- (b) Nepal
- (c) Bangladesh
- (d) Sri Lanka

**42. What is the rank of India in the recently released Environmental Performance Index 2024?**

- (a) 156
- (a) 166
- (c) 176**
- (d) 186

**43. David Weese has announced his retirement from international cricket, he played for which country?**

- (a) Namibia**
- (b) England
- (c) Canada
- (d) USA

**44. What is the theme of International Yoga Day 2024?**

- (a) 'Do yoga and stay healthy'
- (b) 'Yoga for self and society'**
- (c) 'Youth contribution to Yoga'
- (d) 'Yoga for Society'

**45. Who won the gold medal in the men's javelin event at the Paavo Nurmi Games 2024 athletics meet?**

- (a) Julian Weber
- (b) Neeraj Chopra**
- (c) Anderson Peters
- (d) Vikrant Malik

**46. In which state did Prime Minister Narendra Modi inaugurate the Nalanda University campus?**

- (a) Bihar**
- (b) Uttar Pradesh
- (c) Madhya Pradesh
- (d) Karnataka

**47. The Union Cabinet approved the Vadhavan port, in which state will it be built?**

- (a) Gujarat
- (b) Odisha
- (c) Maharashtra**
- (d) Tamil Nadu

**48. Who has been recently appointed as Delhi MCD Commissioner?**

- (a) Ashwini Kumar**
- (b) Abhishek Sinha
- (c) Rajeev Saxena
- (d) Amit Pandey

**49. Who has become the second fastest bowler to take 100 wickets in T20 International?**

- (a) Axar Patel
- (b) Adil Rashid
- (c) Adam Zampa
- (d) Sandeep Lamichhane**

**50. Who has been appointed as the Protem Speaker of Lok Sabha recently?**

- (a) Om Birla
- (b) Bhartruhari Mahtab**
- (c) Rajnath Singh
- (d) Ram Nath Kovind

**51. In which country is the BRICS Games 2024 being organized?**

- (a) India
- (b) Russia**
- (b) China
- (d) South Africa

**52. In which city did PM Narendra Modi participate in the event under International Yoga Day 2024?**

- (a) Varanasi
- (b) Srinagar**
- (c) Bhopal
- (d) Chennai

**53. When is World Music Day celebrated every year?**

- (a) 19 June
- (b) 20 June
- (c) 21 June**
- (d) 22 June

**54. Which United Nations organization has appointed British actor Theo James as Global Goodwill Ambassador?**

- (a) UNESCO
- (b) UNHCR**
- (c) International Labour Organisation
- (d) IMF

**55. When is World Refugee Day observed every year?**

- (a) 19 June
- (b) 20 June**
- (c) 21 June
- (d) 22 June

**56. India has recently announced the launch of e-medical visa facility for the citizens of which country?**

- (a) Nepal
- (b) Sri Lanka
- (c) Bhutan
- (d) Bangladesh**

**57. India has announced to open a new consulate in which country?**

- (a) Sri Lanka
- (b) China
- (c) Bangladesh**

(d) Japan

**58. Who has been recently appointed as the new Secretary of TRAI?**

- (a) Ramesh Sinha
- (b) Ajay Singh Anand
- (c) Atul Kumar Chaudhary**
- (d) Rajeev Kumar

**59. In which state will the world's first conservation center for red-headed vultures be established?**

- (a) Bihar
- (b) Uttar Pradesh**
- (c) Madhya Pradesh
- (d) Assam

**60. Who has been appointed the Leader of the House in Rajya Sabha?**

- (a) Rajnath Singh
- (b) Amit Shah
- (c) Jagat Prakash Nadda**
- (d) Jyotiraditya Scindia

**61. Who has recently released the World Investment Report 2024?**

- (a) World Bank
- (b) UNCTAD**
- (c) Policy Commission
- (d) World Economic Forum

**62. Which city was awarded the World Crafts City tag by the World Crafts Council?**

- (a) Srinagar**
- (b) Lucknow
- (c) Udaipur
- (d) Patna

**63. Lake Natron, which was in the news recently, is located in which country?**

- (a) UAE
- (b) Tanzania**
- (c) Uzbekistan
- (d) Armenia

**64. Which city in Kerala has been officially declared as India's first UNESCO City of Literature?**

- (a) Thiruvananthapuram
- (b) Kochi
- (c) Kozhikode**
- (d) Kannur

**65. Who has been elected as the Speaker of the 18th Lok Sabha?**

- (a) K. Suresh
- (b) Om Birla**
- (c) Jagan Mohan Reddy
- (d) J.P. Nadda

**66. How many medals has India won in total in BRICS Games 2024?**

- (a) 20
- (a) 25
- (c) 27
- (d) 29**

**67. Recently, which state has announced to establish 'Prime Minister Excellence College' in every district?**

- (a) Uttar Pradesh
- (b) Madhya Pradesh**
- (c) Gujarat
- (d) Karnataka

**68. How many medals did India win in total in the Under-17 Asian Wrestling Championship?**

- (a) 11**
- (a) 12
- (c) 13
- (d) 14

**69. Who qualified for Paris Olympics 2024 through Universality Quota in Swimming?**

- (a) Srihari Nataraja
- (b) Dhanidhi Desinghu
- (c) Sajan Prakash
- (d) Both (a) and (c)**

**70. Where was the India Olympic Research and Education Centre launched?**

- (a) Uttar Pradesh
- (b) Odisha
- (c) Gujarat**
- (d) Haryana

**71. What is the theme of 'International Olympics Day 2024'?**

- (a) Together, For a Peaceful World
- (b) Let's Move and Celebrate**
- (c) Together for a better world
- (d) Moving Forward: United by Emotion

**72. Recently, which country has become the 100th full member to join the International Solar Alliance?**

- (a) Paraguay**
- (b) China
- (c) South Africa
- (d) Brazil

**73. Who has been awarded the 'PEN Pinter Prize 2024'?**

- (a) Vikram Seth
- (b) Neelam Saxena
- (c) Arundhati Roy**
- (d) Vikram Singh

**74. Who has been elected as the President of the European Council of the European Union?**

- (a) Kaja Kallas
- (b) Philemon Yang
- (c) Antonia Costa**
- (d) Theo James

**75. Who won the ICC T20 Cricket World Cup 2024?**

- (a) India**
- (b) Australia
- (c) South Africa
- (d) England

# ICC T20 Cricket World Cup 2024

## Important Facts

- ICC Men's T20 World Cup = **9th edition = 2024**
- From 01 to 29 June 2024
- Played at **America and West Indies**
- **Canada, Uganda and USA** Played for the first time
- For the first time, 20 teams participated

**First World Cup – India (Won) in 2007**

**Last World Cup – England (Won) in 2022**

- **Brandmaster** – Yuvraj Singh , Chris Gayle, Usen Bolt, Shahid Afridi
- **Official Anthem** — Out of this world
- **Won** — India
- **Runner Up** – South Africa
- **Player of the Series** — Jasprit Bumrah
- **Player of the Match** — Virat Kohli
- **Maximum Runs** — Rahmanullah Gurbaz (Afghanistan) (281 Runs in 8 Matches)
- **Maximum Wickets** —Fazalhaq Farooqui (Afghanistan) (17 Wicket in 8 Matches)
- **2026 ICC Men's T20 World Cup** — India and SL

## India and World Cup Trophies

| Event             | Year | Captain              | Runner Up Team |
|-------------------|------|----------------------|----------------|
| ICC ODI World Cup | 1983 | Kapil Dev            | West Indies    |
| ICC T20 World Cup | 2007 | Mahendra Singh Dhoni | Pakistan       |
| ICC ODI World Cup | 2011 | Mahendra Singh Dhoni | Srilanka       |
| ICC T20 World Cup | 2024 | Rohit Sharma         | South Africa   |

India became first team to win the men's T20 World Cup unbeaten

India became the first team to win the men's T20 World Cup without losing a game all tournament. India won all eight matches they played in the tournament, and had one washout: the first-round game against Canada. India's eight consecutive wins in completed games is the joint-longest winning streak for any team in the men's T20 World Cup. Australia won eight successive games across

the 2022 and 2024 editions, while South Africa was on an eight-match winning streak before Final's defeat.

**8-1** - Win-loss record of the teams winning the toss in the finals of the men's T20 World Cup. The only team to lose a final despite winning the toss was Sri Lanka against Pakistan in 2009.

It is only the third instance of a team winning a men's T20 World Cup final while defending a total. India against Pakistan in 2007 and West Indies against Sri Lanka in 2012 won the final while batting first.

**2** - India is now the **third team** to win the men's T20 World Cup for the second time, having won the inaugural 2007 edition. West Indies were the first team with two titles, having won in 2012 and 2016, while England won in 2010 and 2022.

**9 - Players to be part of two men's T20 World Cup final wins** - Rohit Sharma was added to the list on 29 June 2024. Eight West Indies players were part of their both title wins - Daren Sammy, Marlon Samuels, Chris Gayle, Johnson Charles, Dwayne Bravo, Samuel Badree, Andre Russell and Denesh Ramdin.

**176 for 7** - India's total against South Africa on Saturday is the highest by any team in the final of the men's T20 World Cup. Australia's 173 for 2 in a run chase against New Zealand in 2021 was the previous highest. The 345 runs scored in Bridgetown is the joint-highest aggregate for a men's T20 World Cup final.

**23** - Balls Heinrich Klaasen needed for his fifty against India, the fastest in any men's World Cup final. The previous quickest was off 31 balls by Mitchell Marsh against New Zealand in the 2021 T20 World Cup final.

**16 - Player-of-the-Match** awards for Virat Kohli in the T20I format – the most for any player in Men's T20Is, surpassing Suryakumar Yadav's 15. Eight of Kohli's 16 match awards have come in the men's T20 World Cup, while no one else has more than five.

**37y, 60d** - Rohit's age on Saturday, making him the oldest captain to win a T20 World Cup. He is also the second-oldest captain to win an ICC tournament final, behind Imran Khan, who was **39 year and 172 days** old when Pakistan defeated England in the 1992 ODI World Cup final.

**8-0 - Rohit's win-loss record as captain in T20 finals** - six with Mumbai Indians and two for India. Only MS Dhoni has won more men's T20 finals as captain than Rohit, nine out of 15.

**This is also the 11th T20 final where Rohit was part of the winning side of the 12 he has played.** Only Dwayne Bravo (17), Kieron Pollard (16) and Shoaib Malik (15) have more men's T20 final wins than Rohit.

**49 - Wins for Rohit as captain out of the 62 T20Is where he led India,** the most for anyone in men's T20Is, surpassing Babar Azam's 48. India have lost only 12 T20Is under Rohit's captaincy, while another game ended in a tie, which India went on to win in the Super Over.

**2 - Number of players, including Kohli, to be part of the winning team in the finals of all three ICC white-ball events (ODI World Cup, T20 World Cup and Champions Trophy). MS Dhoni was the first to be part of all three, and he did it as a captain.**

### T20 World Cup Winners List from 2007 to 2024

| Year | Host(s)      | Final venue                     | Final                        |                            |                                    | Winning Captain  |
|------|--------------|---------------------------------|------------------------------|----------------------------|------------------------------------|------------------|
|      |              |                                 | Winner                       | Result                     | Runner-up                          |                  |
| 2007 | South Africa | Wanderers Stadium, Johannesburg | India 157/5 (20 overs)       | India won by 5 runs        | Pakistan 152 all out (19.4 overs)  | MS Dhoni         |
| 2009 | England      | Lord's, London                  | Pakistan 139/2 (18.4 overs)  | Pakistan won by 8 wickets  | Sri Lanka 138/6 (20 overs)         | Younis Khan      |
| 2010 | West Indies  | Kensington Oval, Bridgetown     | England 148/3 (17 overs)     | England won by 7 wickets   | Australia 147/6 (20 overs)         | Paul Collingwood |
| 2012 | Sri Lanka    | R Premadasa Stadium, Colombo    | West Indies 137/6 (20 overs) | West Indies won by 36 runs | Sri Lanka 101 all out (18.4 overs) | Daren Sammy      |
| 2014 | Bangladesh   | Sher-e-Bangla Stadium, Dhaka    | Sri Lanka 134/4 (17.5 overs) | Sri Lanka won by 6 wickets | India 130/4 (20 overs)             | Lasith Malinga   |
| 2016 | India        | Eden                            | West                         | West                       | England                            | Daren            |

|      |                                    |  |   |                                      |                                       |                 |
|------|------------------------------------|--|---|--------------------------------------|---------------------------------------|-----------------|
|      |                                    | Gardens,<br>Kolkata                          | Indies<br>161/6<br>(19.4<br>overs)        | Indies<br>won by<br>4<br>wickets     | 155/9 (20<br>overs)                   | Sammy           |
| 2021 | UAE<br>Oman                        | Dubai<br>International<br>Stadium,<br>Dubai  | Australi<br>a<br>173/2<br>(18.5<br>overs) | Australi<br>a won<br>by 8<br>wickets | New<br>Zealand<br>172/4 (20<br>overs) | Aaron Finch     |
| 2022 | Australia                          | Melbourne<br>Cricket<br>Ground,<br>Melbourne | England<br>138/5<br>(19<br>overs)         | England<br>won by<br>5<br>wickets    | Pakistan<br>137/8 (20<br>overs)       | Jos Buttler     |
| 2024 | West<br>Indies<br>United<br>States | Kensington<br>Oval,<br>Bridgetown            | India<br>176/7<br>(20)                    | India<br>won by<br>7 runs            | South<br>Africa<br>169/8(20)          | Rohit<br>Sharma |

## 5. Prelims and Mains Notes Preparation Scheme

### **V.S. DREAM COACHING FOR HJS, PCS (J.) AND CLAT**

Prelims and Mains Notes Preparation Scheme is going on. Prepare your own excellent study notes to crack HJS, PCS (J) and CLAT on the subjects mentioned below under the able guidance of Hon'ble Mr. Justice Vedpal (Former Judge), High Court of Judicature at Allahabad, Ex-Director of Judicial Training and Research Institute, U.P., Lucknow and resource person of various legal academies and institutions. Seek prior appointment to avoid despair.

| <b>1.General Knowledge</b>   | <b>2.Law</b>   |
|--|--|
| <ol style="list-style-type: none"><li>1. Current Affairs</li><li>2. G.K.MCQs</li><li>3. History of India and Indian Culture</li><li>4. Geography of India</li><li>5. Indian Polity</li><li>6. Current National Issues</li><li>7. Topic of Social Relevance with special reference to newly added 9 Social Acts</li><li>8. India and the World</li><li>9. Indian Economy</li><li>10. International Affairs and Institutions</li><li>11. Development in the field of:<ol style="list-style-type: none"><li>(a) Science and Technology</li><li>(b) Communications and Space</li></ol></li></ol> | <ol style="list-style-type: none"><li>1. Constitutional Law</li><li>2. Law of Evidence</li><li>3. Criminal Procedure Code</li><li>4. Code of Civil Procedure,</li><li>5. Indian Panel Code</li><li>6. Law of Contract</li><li>7. Partnership Act</li><li>8. Easements Act</li><li>9. Law of Torts</li><li>10. Transfer of Property Act</li><li>11. Principles of Equity ,</li><li>12. Law of Trust</li><li>13. Specific Relief Act</li><li>14. Hindu Law</li><li>15. Muslim Law</li><li>16. U.P. Revenue Code.</li><li>17. U.P. Municipalities Act 1916</li><li>18. U.P. Panchayat Raj Act 1947</li><li>19. U.P. Consolidation of Holdings Act, 1953</li><li>20. U.P. Urban (Planning and Development) Act, 1973</li></ol> |
| <b>3.CLAT</b> <ol style="list-style-type: none"><li>1. General Knowledge</li><li>2. A Guide for CLAT</li></ol>   |  |

## **6. About Coaching**

V.S. Dream coaching is one of the Premiere Law Institute that offers coaching for Judicial Services Examinations at all the three levels – Preliminary Test, Main Examination and Personality Test.

We started our journey the month of Sept. 2022 with a vision driven by the socialist ideology. Since its inception, the coaching is successfully conducting courses for Judicial Services Exams and has always worked by aligning itself to the best interest of its students. The coaching Institute is focused on providing comprehensive and reliable training and support to all its students, who plan to appear for the Judicial Services Exam and are in the search of highly qualified targeted and dedicated faculty to crack examinations successfully.

The teaching faculty of the Institute has been drawn from highly qualified persons having experience. We also guide the aspirant in preparing his own notes and quality study Material

### **Teaching pedagogy**

Our faculty uses a teaching pedagogy which is easily understandable and is aspirant friendly. Our patron Hon'ble Mr. Justice Vedpal former Judge High Court Allahabad had been a Trainer of Trainers. Director of Judicial Training and Research institute U.P., Resource person of several Judicial Institutes and member of Law commission U.P. The faculty of the coaching Institutes consists of those who have several decade experience in teaching in the field of law.

## **7. About Director and faculty**

**Ms. Anshu Singh B.A., LL.B is the Director of the Coaching who remained associated with the law for more than two decades.** The director of the coaching possess self-awareness, garner credibility, focus on relationship-building, exhibit humility, empower others, stay authentic, present themselves as constant and consistent, become role models and are fully present

The director aims to improve performance and focuses on the 'here and now' rather than on the distant past or future. The director is subject expert. And focuse on helping the individual to unlock their own potential

### **Regular Faculty**

- 1. Ms. Anshu Singh, B.A. (English Literature) LL.B. The Director, herself**
- 2. Shri Shantanu Baliyan, B.A. LL.B who is a Law graduate from C.C.S. University Campus. He has also received Certificate of Excellency from the**

University. He has started teaching at a very young age and now with his teaching experience, he has developed innovative ways of teaching Law and general knowledge, which suites to the need of a law student, as well as an Judicial service aspirant. He has conducted many online and offline Courses. His notes on Law subjects as well as on general knowledge are masterly work

## **8. Resource persons/Guest Speakers**

1. Hon'ble Mr. Justice Vedpal, Former Judge, High Court Allahabad – Mentor
2. Shri Soraj Singh, Ex-Director (Ag.), U.P. Government – Guest Speakers
3. Mrs. Kalpana Malik, B.Sc., LL.B., LL.M. (P) – Guest Speakers
4. Dr. Venu Agarwal M.A.(English), M.Com. M.Ed., PhD – Guest Speakers

## **9. Library with Research wing**

V.S. Dream Coaching has an excellent Library containing **about five thousand Books, Journals, Brochures, Notes and Guides**. The library in a coaching institute plays an important role in the life of students by serving as the store house of knowledge. It facilitates the work of the resource person and faculty also. The students have also access to library, after coaching hours. Our library changes as technology changes and remains updated in Course subjects. The coaching itself prepares study excellent and qualitative reading material.

Preparing a study material on a subject on Law and General Knowledge, is a herculean task. There is always a debatable question to be asked regarding what, and what not to include and how to differentiate the books and brochures from the ones already available in the market.

There should be a system for the verification of facts, data, etc. While preparing study material, we always keep in the mind the quality, so we hope that the book, brochures prove beneficial to all the aspirants taking examinations with law and General Knowledge.

A coaching should provide students with the fundamental knowledge base or foundation needed in order to be successful in their exam. Aspirants were surveyed to determine how they should be taught. The survey was developed based on course content. We encourage accredited programs to regularly evaluate current curricula for and develop new curricula that reflect changing construction technologies and management trends.



Library



Research wing