

V.S. DREAM COACHING

Indrapuram Ghaziabad

For

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

Year – 2025



**Secret of success is to
know something
nobody else knows**

**NO. 6 OF 2025
NEWSLETTER**

June 2025

Index

S.N.	Subject
1.	Emergency and 50 years
2.	Role of Judiciary in protection of Fundamental Rights
3.	Supreme Court Cases
4.	Study Material-G.K. Vedic Age
5.	Study Material-Language (Active and Passive Voice)
6.	Current Affairs June 2025
7.	Iran-Israel Conflict and War
8.	Prelims and Mains Notes Preparation Scheme

**Established in Sept. 2022
For Judicial Service
Aspirants**

In the service of Judicial Fraternity

V.S. DREAM COACHING

1. Emergency and 50 Years

Introduction

Fifty years ago, on the night of **June 25, 1975**, the Indira Gandhi government declared Emergency on the grounds of “internal disturbance” – the first and only time this clause was used in independent India. The **21-month period** that followed was marked by the suspension of civil liberties, curtailment of press freedom, mass arrests, cancellation of elections, and rule by decree.

Emergency

In the context of modern Indian Political history the “**Emergency**” refers to the period from June 25, 1975 to March 21, 1977, during which the government of Prime Minister Indira Gandhi used special provisions in the Constitution to impose sweeping executive and legislative consequences on the country.

However, emergency provisions contained in Part XVIII of the Constitution of India, from Articles 352 to 360, talk about the three different types of emergencies. Notably, these provisions are borrowed from the German Weimar constitution.

Constitutional Provisions related to Emergencies in India

- **Article 352** of the Indian Constitution deals with the “proclamation of emergency”.
- **Article 353** provides provisions about the “Effect of Proclamation of Emergency”.
- **Article 354** talks about the “application of provisions relating to the distribution of revenues while a Proclamation of Emergency is in operation”.
- **Article 355** deals with the “duty of the Union to protect States against external aggression and internal disturbance”.
- **Article 356** provides “provisions in case of failure of constitutional machinery in States”.
- **Article 357** deals with the “Exercise of legislative powers under Proclamation issued under article 356”.
- **Article 358** frees the state of all limitations imposed by Article 19 (“Right to freedom”) as soon as an emergency is imposed.
- **Article 359** provides provision with regard to the “suspension of the enforcement of the rights conferred by Part III during emergencies”.

- Under **Article 360** provisions about the financial emergency are provided.

Imposition of National Emergency in India

Till now, three times an emergency has been imposed in India:

1. The first time the emergency was imposed was on October 26, 1962, on the grounds of war.
2. The second emergency was imposed on December 3, 1971, on the grounds of war.
3. The third-time emergency was proclaimed on June 25, 1975, due to an “internal disturbance.” (Note: This ground of “internal disturbance” was removed by the Constitution (Forty-fourth Amendment) Act, 1978.)

Types of Emergencies

Various provisions mentioned in Part XVIII of the Constitution provide for three types of emergencies: National Emergency (Articles 352-354, 358-359), President’s Rule (Articles 355–357), Financial Emergency (Article 360).

National Emergency

Under Article 352 of the Constitution, the President may, on the advice of the Cabinet headed by the Prime Minister, issue a proclamation of emergency if the security of India or any part of the country is threatened by “war or external aggression, or armed rebellion”. (Note: In 1975, instead of armed rebellion, the ground of “internal disturbance” was available to the government to proclaim an emergency.) This type of emergency is popularly referred to as a “national emergency”.

President’s Rule (State Emergency)

According to Article 356 (1), if the President, on receipt of a report from the Governor of a State or otherwise, is satisfied that a situation has arisen in which the Government of the State cannot be carried on in accordance with the provisions of this Constitution, the President may by Proclamation—

- (a) assume to himself all or any of the functions of the Government of the State and all or any of the powers vested in or exercisable by the Governor or any body or authority in the State other than the Legislature of the State;
- (b) declare that the powers of the Legislature of the State shall be exercisable by or under the authority of Parliament;
- (c) make such incidental and consequential provisions as appear to the President to be necessary or desirable for giving effect to the objects of the Proclamation, including provisions for suspending in whole or in part the operation of any provisions of this Constitution relating to any body or authority in the State.

Financial Emergency

Article 360 provides for financial emergency. It says, “If the President is satisfied that a situation has arisen whereby the financial stability or credit of India or of any part of the territory thereof is threatened, he may by a Proclamation make a declaration to that effect.”

Key events that led to the proclamation of the National Emergency in 1975

Various political and social circumstances in India in 1974 and early 1975 led to the proclamation of the National Emergency. Some of these events were:

JP movement: Early in 1974, a student movement called Navnirman (Regeneration) began in Gujarat against the Congress government of Chimanbhai Patel, which was seen as corrupt. As the protests became violent, Patel had to resign and President’s Rule was imposed. Navnirman inspired a students’ movement in Bihar against corruption and poor governance, and the ABVP and socialist organisations came together to form the Chhatra Sangharsh Samiti. The students asked Jayaprakash Narayan, a Gandhian and hero of the Quit India Movement, to lead them. He agreed with two conditions — that the movement would be non-violent and pan-Indian, and aim to cleanse the country of corruption and misgovernance. Thereafter, the students’ movement came to be called the “JP movement”.

On June 5, during a speech in Patna’s historic Gandhi Maidan, JP gave a call for “**Sampoorna Kranti**”, or total revolution. By the end of the year, JP had got letters of support from across India, and he convened a meeting of opposition parties in Delhi. He travelled across the country in January and February 1975. JP’s rallies invoked the power of the people with the rousing slogan, “**Sinhasan khaali karo, ke janata aati hai (Vacate the throne, for the people are coming)**”.

Railway Strike of 1974: In May 1974, the socialist leader George Fernandes led an unprecedented strike of railway workers that paralysed the Indian Railways for three weeks.

Raj Narain verdict: On **June 12, 1975**, Justice Jagmohanlal Sinha of Allahabad High Court delivered a historic verdict in a petition filed by Raj Narain, convicting Indira Gandhi of electoral malpractice, and striking down her election from Rae Bareilly.

On appeal, the Supreme Court gave the Prime Minister partial relief — she could attend Parliament but could not vote. Late in the evening of **June 25, 1975**,

President Fakhruddin Ali Ahmed, acting on the advice of the Prime Minister, issued a proclamation of Emergency under Article 352(1) of the Constitution, which at that time empowered him to do so on grounds of threat to the security of the nation from “war or external aggression” or “internal disturbance”. (**Note: The Constitution (Forty-fourth Amendment) Act, 1978** subsequently replaced the words “internal disturbance” with “armed rebellion”.)

Major constitutional implications during and post-1975 National Emergency

After the national emergency was declared, significant changes occurred in the country since the declaration of emergency converted the federal structure into a de facto unitary one as the Union acquired the right to give any direction to state governments, which, though not suspended, came under the complete control of the Centre. Newspapers were subjected to pre-censorship. **UNI and PTI** were merged into a state-controlled agency called **Samachar**.

The national emergency of 1975 brought about numerous changes in various aspects of India’s democracy. Some of the major constitutional changes made during the national emergency of 1975 were:

38th and 39th Constitutional Amendments: With the opposition in jail, Parliament passed ‘**The Constitution (Thirty-eighth Amendment) Act**’ that barred judicial review of the Emergency, and ‘**The Constitution (Thirty-ninth Amendment) Act**’ placed the election of the President, Vice President, Prime Minister, and Speaker beyond the jurisdiction of courts.

42nd Constitutional Amendment: The Constitution (Forty-second Amendment) Act made changes to a range of laws, taking away the judiciary’s right to hear election petitions, widening the authority of the Union to encroach on State subjects, gave Parliament unbridled power to amend the Constitution with no judicial review possible, and made any law passed by Parliament to implement any or all directive principles of state policy immune to judicial review.

During the Emergency, Parliament may by law extend the (five-year) term of Lok Sabha one year at a time, make laws on subjects in the State List, and extend the Union’s executive powers to the states. The President can modify, with parliamentary approval, constitutional provisions on the allocation of financial resources between the Union and states.

Post-emergency events

The emergency was lifted early in 1977 and the Janata Party — the product of the merger of the Jana Sangh, Congress (O), the socialists and Bharatiya Lok Dal — came to power, and Morarji Desai became India’s first non-Congress PM. From constitutional amendments to the emergence of a coalition government, the

aftermath of the national emergency introduced new social forces and led to the decentralization of power. Some of the major constitutional changes post-emergency were:

44th Constitutional Amendment: The Janata government reversed many of the constitutional changes effected by the 42nd Amendment Act of 1976. It did not do away with the provision of the emergency, but made it extremely difficult to impose for the future.

It made judicial review of a proclamation of emergency possible again, and mandated that every proclamation of emergency be laid before both Houses of Parliament within a month of the proclamation. Unless it was approved by both Houses by a special majority — a majority of the total strength of the House and not less than two-thirds of the members present and voting — the proclamation would lapse.

The 44th Amendment removed “internal disturbance” as a ground for the imposition of an emergency, meaning that armed rebellion alone would now be a ground, apart from war and external aggression. However, the 44th Amendment left the words ‘secular’ and ‘socialist’, inserted in the Preamble by the 42nd Amendment, untouched.

Shah Commission and its report: The Shah Commission, constituted by the Janata government to report on the imposition of the Emergency and its adverse effects, submitted a damning report that found the decision to be unilateral, and adversely affecting civil liberties.

Constitutional lessons from the 1975 national emergency

History offers invaluable lessons on how to keep from repeating the mistakes that led to the lowest points in our past. The imposition of the Emergency is one such event in Indian political history that continues to guide present and future generations, given its implications for democracy and the right of citizens to live with dignity. The lesson from the 1975 emergency is that to protect democracy, it’s necessary to guarantee accountability and rule of law through the independent judiciary, free press, political opposition, and, most importantly, active civil society.

2. Role of Judiciary in protection of Fundamental Rights

Introduction

Fundamental rights are the essential freedoms and protections that every individual is entitled to, simply by virtue of being human. These rights often include core freedoms such as the right to life, liberty, and personal security; freedom of expression; freedom of religion; the right to equality before the law; and the right to a fair trial, among others. They are the very cornerstone of democracy, making it possible for individuals to live in dignity and security, free from unwarranted interference, oppression, or discrimination. These rights are typically enshrined in national constitutions or international human rights agreements and are meant to provide a safeguard against potential abuses of power by the state or other entities. However, the mere existence of these rights in legal documents is not enough to guarantee their protection. It is the judiciary that serves as the primary institution responsible for ensuring that these rights are not only recognized but effectively upheld. It ensures that these rights are not violated and that individuals can access justice.

Guardian of the Constitution

The judiciary acts as a guardian of the Constitution, interpreting its provisions and ensuring they are upheld. This often includes reviewing laws and government actions to determine their constitutionality. When any kind of law or action, by the government, threatens or encroaches upon basic rights, the judiciary comes in to remedy that violation.

Role of Judiciary in protection of fundamental rights

One of the most significant tools available to the judiciary in protecting fundamental rights is **judicial review**. Judicial review refers to the process by which courts examine the constitutionality of laws, regulations, and governmental actions. If a law or government act violates an individual's fundamental rights or contradicts the Constitution, the judiciary can strike it down or declare it invalid. For Instance, the Supreme Court of India has played a key role in expanding fundamental rights through its interpretation of the Constitution, including the recognition of the right to privacy as a fundamental right in the landmark **Justice K.S. Puttaswamy Vs. Union of India (2017)** case. Moreover, Judicial review is critical to ensuring that laws are applied fairly and consistently. Courts can intervene to protect rights when legislation is vague, discriminatory, or implemented in a manner that disproportionately affects certain groups, such as minorities, women, or marginalized communities.

Another key aspect of the judiciary's role in protecting fundamental rights is **judicial activism**. Judicial activism refers to the judiciary's proactive role in interpreting and expanding fundamental rights, particularly when there are gaps in the law or the legislature is slow to act. Courts may interpret constitutional protections in expanding form above and beyond a strict reading of the law in cases where there's no specific law governing a rights issue, or even when existing laws do not seem adequate. Judicial activism would be important in case the progressive legislation did not come from the legislature following the values of society. The judiciary steps in and further expands and interprets rights under these modern circumstances to protect fundamental rights. For example, in India, the Supreme Court has been particularly active in ensuring the protection of rights for marginalized communities, including women, children, and the LGBTQ+ community.

Through judicial activism, the Court has delivered landmark rulings, such as decriminalizing homosexuality in the **Navtej Singh Johar Vs. Union of India (2018)** case, where it overturned **Section 377 of the Indian Penal Code, 1860** which criminalized consensual same-sex relations. This decision reflected the Court's willingness to interpret the Constitution in a manner that promotes human dignity and inclusivity.

In addition, courts also play an essential role in directly enforcing fundamental rights. This is particularly evident in cases where individuals seek redress for violations of their rights, whether by the government or private entities. **Article 32(1)** of the Indian Constitution states "The right to move the Supreme Court by appropriate proceedings for the enforcement of the rights," whereas **Article 226** of the Indian Constitution gives individuals the right to approach the High Courts if their fundamental rights have been violated. Courts provide a venue for aggrieved parties to seek justice and hold wrongdoers accountable. For instance, individuals whose rights are infringed upon, such as victims of unlawful detention, police brutality, or discrimination, can approach the judiciary to seek a remedy. The Supreme Court and High Courts can issue **writs** to the government for enforcing rights. The writs include a writ of Habeas Corpus, a writ of Mandamus, a writ of Prohibition, a writ of Qua-Warranto, and a writ of Certiorari. By taking such actions, the judiciary ensures that individuals can access their rights on time.

Conclusion

The judiciary plays an indispensable role in protecting fundamental rights, ensuring that individuals' freedoms and liberties are safeguarded against encroachment by the state or private actors. Through judicial review, judicial activism, and enforcement of rights, the judiciary ensures that fundamental rights are respected and upheld. While judicial activism has broadened the scope of

these protections, it also underscores the evolving nature of constitutional law in a dynamic society. Ultimately, the independence of the judiciary is vital to maintaining the rule of law, ensuring justice for all, and protecting the core values of human dignity, equality, and freedom in democratic societies.

3. Important Supreme Court Cases

June 2025

S.N.	Subject	Case Reference
1.	A right of appeal is an invaluable right, particularly for an accused who cannot be condemned eternally by a trial judge, without having a right to seek a re-look of the Trial Court's judgment by a superior or appellate court. The right to prefer an appeal is not only a statutory right but also a constitutional right in the case of an accused. This is because an accused has a right to not only challenge a judgment on its merits, namely, with respect to the conviction and sentence being imposed on him, but also on the procedural aspects of the trial.	Nagarajan Vs. State of Tamil Nadu, decided on 04.06.2025
2.	The offence under Section 387 IPC doesn't require actual delivery of property; instead, putting a person in fear of death/grievous hurt for the purpose of extortion is sufficient.	M/s. Balaji Traders Vs. State of Uttar Pradesh & Anr., decided on 05.06.2025
3.	Accused person has a right to voluntarily undergo a narco-analysis test, but at the appropriate stage of the trial, that is, when the accused is exercising his right to lead the evidence. Having said that, there is no indefeasible right of the accused to undergo a narco-analysis test as the right is dependent on many factors to be considered by the Court concerned.	Amlesh Kumar Vs. State of Bihar, decided on 09.06.2025

IN THE SUPREME COURT OF INDIA

Nagarajan
Vs.
State of Tamil Nadu

**[Criminal Appeal Nos. 2892-2893 of 2025
arising out of SLP (Crl.) Nos. 621-622 of 2024]**

HEADNOTE – A right of appeal is an invaluable right, particularly for an accused who cannot be condemned eternally by a trial judge, without having a right to seek a re-look of the Trial Court's judgment by a superior or appellate court. The right to prefer an appeal is not only a statutory right but also a constitutional right in the case of an accused. This is because an accused has a right to not only challenge a judgment on its merits, namely, with respect to the conviction and sentence being imposed on him, but also on the procedural aspects of the trial.

JUDGMENT

Nagarathna, J.

1. Leave granted.
2. Being aggrieved by the common impugned order dated 29.11.2021 passed by the High Court of Judicature at Madras Bench at Madurai dismissing the Criminal Appeal preferred by the appellant being Crl. A. (MD) No. 137/2015 and allowing the suo motu revision being Crl. R.C. (MD) No. 248/2015 thereby convicting the appellant under Sections 306 and 448 of the Indian Penal Code, 1860 (hereinafter referred to as "IPC&"), the present Criminal Appeals have been filed by the appellant (accused).
3. Briefly stated, the facts of the case are that the appellant was the neighbour of the deceased Smt. Mariammal. On the night of 11.07.2003, the appellant entered the room of the deceased and while hugging her, attempted to outrage her modesty. Upon hearing the disturbance, the mother-in-law of the deceased intervened and scolded the appellant, who then fled from the premises.

The next day i.e., on 12.07.2003, at around 5:00 A.M., the mother-in-law of the deceased found the deceased and her infant daughter missing from the house. Thereafter, she searched for them and enquired about their whereabouts from the deceased's father. It was later revealed that in the morning, the deceased had visited the school where her elder daughter was studying in Class III and attempted to take her away. However, due to the absence of the warden, the teachers did not allow the child to leave.

The deceased thereafter went to a nearby field with her infant of one and half years and committed suicide by consuming oleander seeds and also administered poison to her child. Both the deceased and her child were later discovered by a passerby who was grazing cattle nearby, who then alerted the village watchman. Although the child was still alive when found, she was declared dead when she was taken to the hospital.

4. Based on the complaint lodged by the watchman, FIR No. 239/2003 was registered with Kannivadi Police Station under Section 306 of IPC against the appellant. Upon completion of the investigation, a charge-sheet was filed on 30.10.2003 against the appellant under Section 306 of IPC. The case was committed to the Mahila Court, Fast Track Court, Dindigul as S.C. No. 54 of 2007. The Trial Court altered the charges to Sections 354 and 448 of IPC and on 29.05.2015, the Trial Court acquitted the appellant of the charge under Section 306 of IPC.

The appellant was convicted under Sections 354 and 448 of IPC and sentenced to undergo simple imprisonment for three years and one month and to pay a fine of Rs. 25,000/- and in default whereof to undergo simple imprisonment for three months for the offence under Section 354 of IPC and a further sentence simple imprisonment for three months for the offence under Section 448 of IPC. The Trial Court observed that the evidence on record reveals that the appellant trespassed into the house of deceased at midnight and hugged her.

Accordingly, the Trial Court convicted the appellant under Sections 354 and 448 of IPC. Insofar as Section 306 of IPC was concerned, the Trial Court observed that the actions of the appellant did not constitute abetment of suicide as the appellant did not instigate the deceased to commit suicide. Hence, the Trial Court acquitted the appellant under Section 306 of IPC.

5. Being aggrieved by the conviction under Sections 354 and 448 of IPC, the appellant filed Criminal Appeal before the High Court being CrI. A. (MD) No. 137/2015. While admitting the appeal and entertaining the appellant's application for suspension of sentence, the High Court, upon a prima facie appraisal of the Trial Court's reasoning, formed the view that the appellant's acquittal under Section 306 of IPC may require further examination.

Observing that the evidence relating to abetment of suicide was not duly appreciated and noting that the State had not filed an appeal against the acquittal, the High Court by order dated 08.06.2015, suo motu directed the registration of a criminal revision case to examine the propriety of the acquittal. This came to be registered as CrI. R.C.(MD) No. 248 of 2015. This was during the pendency of accused appeal before the High Court.

6. In order to exercise of suo motu revisional powers of the High Court, appointed an Amicus Curiae to assist the Court. The Amicus was further tasked to examine the Trial Court's findings in acquitting the Appellant accused under Section 306 of IPC.

7. By common impugned judgment dated 29.11.2021, the High Court asserted that it has the inherent power to initiate suo motu revision under Section 401 of the Code of Criminal Procedure, 1973 (for short, "CrPC&). The High Court dismissed the Criminal Appeal filed by the appellant and allowed the suo motu Criminal Revision Petition, thereby convicting the appellant under Sections 306 and 448 of IPC and sentenced him to undergo rigorous imprisonment for five years and to pay a fine of Rs. 5,000/- and in default, to undergo simple imprisonment for three months for the offence under Section 306 of IPC and sentenced him to undergo simple imprisonment for three months for the offence committed under Section 448 of IPC.

The High Court observed that the appellant has played an active role in tarnishing the self-esteem of the deceased by outraging her modesty and thereby instigated her to commit suicide. Hence, the offence under Section 306 of IPC was made out.

8. Being aggrieved, the appellant has filed the present Criminal Appeals.

9. We have heard learned counsel for the respective parties and perused the material on record. This appeal is being disposed of by following the judgment of this Court in Sachin vs. State of Maharashtra, Criminal Appeal Nos.2073-2075 of 2025 dated 21.04.2025. The relevant paragraphs of the said judgment read as under:

"23. The question for consideration in this case is, whether, in an appeal against conviction, the appellate court could have directed enhancement of the sentence in an appeal filed by the accused. Under clause (b) of Section 386 CrPC, firstly, the appellate court can no doubt alter the findings and sentence and acquit or discharge the accused or order him to be retried by a Court of competent jurisdiction subordinate to such appellate court or committed for trial. Secondly, the appellate court can also alter the findings but maintain the sentence. Thirdly, the appellate court can, in an appeal from a conviction, with or without altering the finding, alter the nature or the extent, or the nature and extent, of the sentence but not so as to enhance the same.

A plain reading of this would imply that in an appeal against conviction which is obviously filed by the accused, the challenge could be two-fold: firstly, it could be against the conviction itself in which case there is a challenge to the sentence also; and secondly, the challenge could be only to the sentence while accepting

the conviction. In other words, the challenge would also be only for reduction of the sentence.

The question is, whether, in an appeal challenging the conviction and sentence, the appellate court could, while affirming the conviction enhance the sentence imposed by the trial court by directing that the same had to be with reference to other statutory provisions. There is no doubt that the appellate court while maintaining the conviction can reduce the sentence and grant partial relief to an accused but in an appeal filed by the appellant-accused, can the appellate court not only affirm the conviction but go a step further and seek to enhance the sentence than what has been imposed by the Trial Court.

It cannot be lost sight of that in an appeal filed by the accused, the appellant-accused is, at best, seeking a reversal of the conviction as well as setting aside of the sentence and the least that the appellant-accused can expect is even while the conviction is affirmed, the sentence could be maintained, if not reduced.

24. Thus, in an appeal filed by the appellant-accused against the judgment of the conviction and sentence, can the accused be left worse-off while the conviction is affirmed by the appellate court exercising appellate jurisdiction by enhancing the sentence? In such an event, the appellant-accused would be better off, if he either withdraws his appeal or, not to file an appeal at all. But an appeal is not only a valuable statutory right but also a constitutional right in criminal cases.&

10. That a right of appeal is an invaluable right, particularly for an accused who cannot be condemned eternally by a trial judge, without having a right to seek a re-look of the Trial Court's judgment by a superior or appellate court. The right to prefer an appeal is not only a statutory right but also a constitutional right in the case of an accused. This is because an accused has a right to not only challenge a judgment on its merits, namely, with respect to the conviction and sentence being imposed on him, but also on the procedural aspects of the trial.

An accused can question procedural flaws, impropriety and lapses that may have been committed by the Trial Court in arriving at the judgment of conviction and imposition of sentence in an appeal filed against the same. It then becomes the duty of the appellate court to consider the appeal from the perspective of the accused-appellant therein to see if he has a good case on merits, and to set aside the judgment of the Trial Court and acquit the accused, or to remand the matter for a re-trial in accordance with law, or to reduce the sentence while maintaining the conviction or, in the alternative, to dismiss the appeal.

In our considered view, the appellate court in an appeal filed by the accused cannot while maintaining the conviction enhance the sentence. While exercising its appellate jurisdiction, the High Court cannot act as a revisional court,

particularly, when no appeal or revision has been filed either by the State, victim or complainant for seeking enhancement of sentence against accused. In the aforesaid judgement, we have analysed Section 386 of CrPC which deals with the right of a party including an accused to file an appeal, we may peruse Section 401 of CrPC which deals with the revisional powers of the High Court and which is extracted as under:

"401. High Court's powers of revision.-

(1) In the case of any proceeding the record of which has been called for by itself or which otherwise comes to its knowledge, the High Court may, in its discretion, exercise any of the powers conferred on a Court of Appeal by sections 386, 389, 390 and 391 or on a Court of Session by section 307, and, when the Judges composing the Court of Revision are equally divided in opinion, the case shall be disposed of in the manner provided by section 392.

(2) No order under this section shall be made to the prejudice of the accused or other person unless he has had an opportunity of being heard either personally or by pleader in his own defence.

(3) Nothing in this section shall be deemed to authorise a High Court to convert a finding of acquittal into one conviction.

(4) Where under this Code an appeal lies and no appeal is brought, no proceeding by way of revision shall be entertained at the instance of the party who could have appealed.

(5) Where under this Code an appeal lies but an application for revision has been made to the High Court by any person and the High Court is satisfied that such application was made under the erroneous belief that no appeal lies thereto and that it is necessary in the interests of Justice so to do, the High Court may treat the application for revision as a petition of appeal and deal with the same accordingly.&

11. Sub-section (4) of Section 401 of CrPC states that where under the CrPC an appeal could have been filed and has not been filed, then no proceeding by way of revision could be entertained at the instance of the party who could have appealed. This means if a State, complainant or the victim who have the right to file an appeal do not opt to do so, then the High Court cannot entertain a revision at its behest. Also, if an appeal lies under the CrPC but an application for revision has been made to the High Court by any person under an erroneous belief, then the High Court can treat the application for revision as petition of appeal and deal with the same accordingly.

What is pertinent is that under Section 401 of CrPC, the High Court is not authorised to convert the findings of acquittal into one of conviction by exercise of revisional jurisdiction. This salutary principle can be extended to also mean that the High Court cannot enhance the sentence imposed by a Trial Court on conviction in an appeal filed by the accused/convict. Thus, in sum and substance, it can be observed that in an appeal filed by the accused seeking setting aside of the conviction or sentence, the High Court cannot exercise its revisional powers and while affirming the conviction direct for enhancement of sentence, when actually appeal could have been filed by the State, complainant or the victim and has not been filed.

Therefore, where an appeal has been filed by the accused challenging the conviction and the sentence, the revisional jurisdiction cannot be exercised by the High Court so as to remand the matter to the Trial Court for the purpose of enhancement of the sentence. However, in this case, our focus of attention is whether, in the absence of any appeal or revision filed by the State, a complainant or a victim in a particular case and when the appeal has been filed only by the accused/convict assailing the judgment of conviction and sentence, the High Court can exercise its revisional jurisdiction to enhance the sentence.

In other words, when an accused is seeking setting-aside of a judgment of conviction and sentence, can the High Court, in the absence of there being any challenge to the same from any other quarter, suo motu exercise its revisional power and thereby condemn the accused by awarding an enhancement in his sentence. Even if an opportunity of hearing is given to such an accused/convict, we do not think that the High Court can exercise its revisional jurisdiction under Section 401 of CrPC while exercising its appellate jurisdiction in an appeal filed by the accused/convict in the High Court.

All that the High Court can do is to set-aside the judgment of conviction and sentence and acquit the accused, or while doing so, order for a retrial, or in the alternative, while maintaining the conviction, reduce the sentence. In other words, in an appeal filed only by the accused/convict, the High Court cannot suo motu exercise its revisional jurisdiction and enhance the sentence against the accused while maintaining the conviction. In this regard, we find that the expression "but not so as to enhance the same" in sub-clause (iii) of clause (b) of Section 386 of CrPC throws some light on the view we have taken, which reads as under:

"386. Powers of the Appellate Court.-

(b) in an appeal from a conviction-

(iii) with or without altering the finding, alter the nature or the extent, or the nature and extent, of the sentence, but not so as to enhance the same& Although the said expression "but not so as to enhance the same& is in the context of sub-clause (iii) of clause (b) of Section 386 of CrPC, the spirit of the said provision must be understood, inasmuch as while maintaining the finding of conviction, the High Court cannot exercise its revisional jurisdiction under Section 401 of CrPC and enhance sentence awarded to the accused/appellant.

12. In this context, we also observe that the Trial Court should also be very careful while passing an order of sentence inasmuch as the sentence imposed must be concomitant with the charge(s) framed and the findings arrived at while arriving at a judgment of conviction. If the charges are proved beyond reasonable doubt against an accused, then the sentence following a finding and judgment of conviction must be appropriate to the nature of the charge(s) which are proved by the prosecution.

13. In this regard, it must be noted that for exercise of powers of the appellate court for enhancement of sentence in an appeal filed either by the State or the complainant or the victim, the CrPC provides that the appellate court can reverse the finding and sentence and acquit or discharge the accused, or order him to be re-tried by a court competent to try the offence, or alter the finding by maintaining the sentence, or with or without altering the finding, alter the nature or the extent, of the sentence so as to enhance or reduce the same.

Thus, the power to enhance the sentence can be exercised by the appellate court only in an appeal filed by the State, victim or complainant, provided the accused has had an opportunity of showing cause against such enhancement. It is further provided that the appellate court shall not inflict greater punishment for the offence which in its opinion the accused has committed, than might have been inflicted for that offence by the court passing the order of sentence under appeal.

Therefore, in an appeal for enhancement of sentence filed by the State etc., unless the conditions prescribed in the form of provisos to Section 386 of CrPC are complied with by the appellate court, there cannot be an enhancement of sentence. Obviously in such an appeal for enhancement of sentence, the convict or the accused is the respondent and therefore there cannot be enhancement of sentence unless the accused or convict has been heard.

However, under the scheme of Section 386 of CrPC vis-à-vis in an appeal for enhancement of sentence, there can also be an acquittal of the accused as per sub-clause (i) of clause (c) of Section 386 of CrPC. But, on the other hand, in an appeal from a conviction, it has been expressly stated that there cannot be enhancement of the sentence.

Therefore, while in an appeal for enhancement of sentence filed by the State, the accused can make out a case for acquittal or discharge or retrial, in the case of an appeal from conviction, the respondent in such an appeal, namely the State or the victim or the complainant, cannot seek enhancement of the sentence than what has been awarded by the Trial Court in the absence of filing any appeal or revision. The above distinction can be explained by way of a latin maxim which has been discussed by Ujjal Bhuyan, J., while in Bombay High Court, in Jyoti Plastic Works Pvt. Ltd. vs. Union of India and Ors., 2020 OnLine Bom 2276, in the following words:

"40. In this connection we may refer to the maxim reformatio in peius. It is a latin phrase meaning a change towards the worse i.e., a change for the worse. As a legal expression it means that a lower court judgment is amended by a higher court into a worse one for those appealing it. In many jurisdictions, this practice is forbidden ensuring that an appellant cannot be placed in a worse position as a result of filing an appeal.

When the above phrase is prefixed by the words 'no' or 'prohibition', which would render the maxim as no reformatio in peius or prohibition of reformatio in peius, it would denote a principle of procedure as per which using a remedy available in law should not aggravate the situation of the person who avails the remedy. In other words, a person should not be placed in a worse position as a result of filing an appeal. No reformatio in peius or prohibition of reformatio in peius is a part of fair procedure and thus by extension can also be construed as part of natural justice. It is not only a procedural guarantee but is also a principle of equity.&

(underlining by us)

14. The rationale of the above can be explained in simple language by stating that no appellant by filing an appeal can be worse-off than what he was. That is exactly what we are seeking to reiterate in our judgment having regard to the facts of the present case.

15. In the instant case, we find that the appellant/accused herein had filed the appeal against the conviction and sentence imposed by the Trial Court for the offences punishable under Sections 354 and 448 of IPC. Insofar as Section 306 of IPC is concerned, the Trial Court had acquitted the appellant. Being aggrieved by the said conviction under Sections 354 and 448 of IPC, the appellant had filed the appeal before the High Court. Neither the State, nor the victim or complainant had sought for enhancement of sentence, or sought for conviction and sentence under Section 306 of IPC before the High Court when the appellant had filed his appeal seeking setting aside of his conviction and sentence.

The High Court, instead of considering the said appeal filed by the appellant on merits, sought to exercise suo motu revisional powers for convicting the appellant under Section 306 of IPC also and thereby sentencing the accused to undergo rigorous imprisonment for five years and to pay a fine of Rs. 5,000/- and in default, to undergo simple imprisonment for three months. The sentences were to run concurrently. Thus, a conviction awarded for offences under Sections 354 and 448 of IPC has also resulted in a conviction under Section 306 of IPC and an enhanced sentence, that too, in an appeal filed by none other than the appellant.

16. We are of the view that in an appeal filed by the accused/convict and in the absence of any appeal filed by the victim, complainant or the State, the High Court cannot exercise suo motu revision either to enhance the sentence or to convict the appellant on any other charge. The reasons for coming to such a conclusion have been discussed above.

17. In the circumstances, we set-aside the conviction and sentence of the appellant under Section 306 of IPC and confirm the judgment of the Sessions Court as affirmed by the High Court qua the offences punishable under Sections 354 and 448 IPC. Consequently, the appellant is directed to undergo the sentence and to pay the fine as imposed by the Sessions Court.

In the event the accused has not yet completed the sentence imposed by the Trial Court, he is directed to surrender before the jurisdictional Chief Judicial Magistrate or before the concerned Police Station for being lodged in the jail to suffer the remainder of the sentence.

In case of failure on the part of the accused to surrender, appropriate action shall be taken up by the concerned Police Station to arrest the accused for being lodged in the jail. The appeals are allowed in part in the aforesaid terms.

.....**J. (B.V. Nagarathna)**

.....**J. (Satish Chandra Sharma)**

New Delhi;

June 04, 2025.

IN THE SUPREME COURT OF INDIA

**M/s. Balaji Traders
Vs.
State of Uttar Pradesh & Anr.**

**[Criminal Appeal No. _____ of 2025
arising out of SLP (Crl.) No. 3159/2025]**

HEADNOTE – The offence under Section 387 IPC doesn't require actual delivery of property; instead, putting a person in fear of death/grievous hurt for the purpose of extortion is sufficient.

JUDGMENT

Sanjay Karol, J.

Leave Granted.

1. The instant appeal, preferred by appellant-complainant, arises out of the judgment and order dated 28th June, 2024 passed by the High Court of Judicature at Allahabad in Criminal Miscellaneous Application No.19550/2024 whereby the summoning order dated 28th August, 2023 as well as entire proceedings of Complaint Case No.58 of 2022 under Section 387 of the Indian Penal Code, 1860¹ has been quashed.

2. Brief facts that led to the present appeal are: The complainant, namely, Prof. Manoj Kumar Agrawal, is a proprietor of a firm M/s. Balaji Traders, carrying out the business of betel nut leaves. Sanjay Gupta², allegedly started a business under the same name, and litigations are pending between the parties with respect to Trademark and Copyright claims.

On 22nd May, 2022, when the complainant was heading towards his house, the accused, along with three unknown persons carrying rifles in their hands, stopped and threatened him to close down his business of betel nut. They further threatened that he could carry on the business only if he would pay five lakhs per month to the accused person. On the complainant's refusal, the accused persons not only beat him but also tried to kidnap him. On failure of police to register First Information Report³, he approached the Court by filing a complaint u/s 200 of the Code of Criminal Procedure, 1973⁴.

3. Pursuant to this complaint, the Trial Court⁵ after analyzing the oral and documentary evidence available, found a prima facie case against the accused person and issued summons to him u/s 387 IPC.

4. Being aggrieved, the accused person approached the High Court by filing a Miscellaneous Application under section 482 CrPC for quashing of summoning order dated 28th August, 2023.

5. The High Court, while referring to various judicial pronouncements, observed that to make out a case of extortion, one of the essential ingredients is to deliver any property or valuable security under threat by the complainant to the accused; and that such ingredient was missing in the instant case as no money was handed over to the accused person. It further observed that since no offence of extortion under Section 383 IPC is made out, consequently, no offence under Section 387 IPC would be made out, thus, finding it a fit case to be quashed.

SUBMISSIONS OF THE PARTIES

6. Learned Counsel for the petitioner submits that the Trial Court rightly issued summons on the basis of the statements of witnesses and the complainant, and the High Court wrongly relied on the judgments dealing with 384 IPC and not 387 IPC.

7. Learned Counsel for respondent No.2, while relying on *Dhananjay @ Dhandhanjay Kumar Singh v. State of Bihar*⁶ submits that since the essential ingredient of extortion, i.e., delivery of property, is not met, consequently, the charge under Section 387 IPC cannot be sustained. Respondent No.2, who is running a similar business to that of the complainant, had lodged an FIR against the complainant, as such the instant FIR is directly linked to the respondent's enforcement of his Intellectual Property Rights and made as a counterblast to the respondent's lawful actions.

Further reliance is placed on *State of Haryana v. Bhajan Lal*⁷; and *Inder Mohan Goswami v. State of Uttaranchal*⁸, submitting that criminal prosecution should not be used as an instrument of harassment, or for seeking personal vendetta with an ulterior motive of pressurizing the accused. Further, placing reliance on *Motibhai Fulabhai Patel & Co. v. R. Prasad*⁹; *Dilip Kumar Sharma v. State of M.P.*¹⁰; and *Tolaram Relumal v. State of Bombay*¹¹, it is submitted that since penal statutes have to be construed and interpreted strictly, section 387 IPC is an aggravated form of extortion and cannot be stretched to cover mere threats, without any delivery of property or valuable security.

POSITION OF LAW

8. Before advertent to the facts of the present case, it is imperative to acknowledge that IPC provides for offences, their ingredients, and their distinct punishments. The relevant Sections of extortion defined in Chapter XVII of IPC are reproduced below:

"Section 383 defines Extortion: Whoever intentionally puts any person in fear of any injury to that person, or to any other, and thereby dishonestly induces the person so put in fear to deliver to any person any property or valuable security or anything signed or sealed which may be converted into a valuable security, commits "extortion".

Section 384 Punishment for extortion: Whoever commits extortion shall be punished with imprisonment of either description for a term which may extend to three years, or with fine, or with both;

Section 385 Putting person in fear of injury in order to commit extortion-Whoever, in order to the committing of extortion, puts any person in fear, or attempts to put any person in fear, of any injury, shall be punished with imprisonment of either description for a term which may extend to two years, or with fine, or with both.

Section 386 Extortion by putting a person in fear of death or grievous hurt.-Whoever commits extortion by putting any person in fear of death or of grievous hurt to that person or to any other, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine

Section 387 Putting person in fear of death or of grievous hurt, in order to commit extortion: Whoever, in order to the committing of extortion, puts or attempts to put any person in fear of death or of grievous hurt to that person or to any other, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.

Section 388. Extortion by threat of accusation of an offence punishable with death or imprisonment for life, etc.-Whoever commits extortion by putting any person in fear of an accusation against that person or any other, of having committed or attempted to commit any offence punishable with death, or with imprisonment for life, or with imprisonment for a term which may extend to ten years, or of having attempted to induce any other person to commit such offence, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine; and, if the offence be one punishable under Section 377 of this Code, may be punished with imprisonment for life.

Section 389. Putting person in fear or accusation of offence, in order to commit extortion.-Whoever, in order to the committing of extortion, puts or attempts to put any person in fear of an accusation, against that person or any other, of having committed, or attempted to commit, an offence punishable with death or with imprisonment for life, or with imprisonment for a term which may extend to

ten years, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine; and, if the offence be punishable under section 377 of this Code, may be punished with imprisonment for life."

(Emphasis Supplied)

9. A glance over all the Sections related to extortion would reveal a clear distinction being carried out between the actual commission of extortion and the process of putting a person in fear for the purpose of committing extortion.

10. Section 383 defines extortion, the punishment therefor is given in Section 384. Sections 386 and 388 provide for an aggravated form of extortion. These sections deal with the actual commission of an act of extortion, whereas Sections 385, 387 and 389 IPC seek to punish for an act committed for the purpose of extortion even though the act of extortion may not be complete and property not delivered. It is in the process of committing an offence that a person is put in fear of injury, death or grievous hurt. Section 387 IPC provides for a stage prior to committing extortion, which is putting a person in fear of death or grievous hurt 'in order to commit extortion', similar to Section 385 IPC. Hence, Section 387 IPC is an aggravated form of 385 IPC, not 384 IPC.

11. Having deliberated upon the offence of extortion and its forms, we proceed to analyze the essentials of both Sections, i.e., 383 and 387 IPC, the High Court dealt with.

12. The essential ingredients of extortion under Section 383 IPC, as laid down by this Court in *R.S. Nayak v. A.R. Antulay*¹², are:

"60. The main ingredients of the offence are:

(i) the accused must put any person in fear of injury to that person or any other person;

(ii) the putting of a person in such fear must be intentional;

(iii) the accused must thereby induce the person so put in fear to deliver to any person any property, valuable security or anything signed or sealed which may be converted into a valuable security; and

(iv) such inducement must be done dishonestly.

Before a person can be said to put any person in fear of any injury to that person, it must appear that he has held out some threat to do or omit to do what he is legally bound to do in future. If all that a man does is to promise to do a thing

which he is not legally bound to do and says that if money is not paid to him he would not do that thing, such act would not amount to an offence of extortion."

13. But a perusal of Section 387 IPC reveals its essential ingredients, to be:

(a) Accused must have put a person in fear of death or grievous hurt;

(b) Such an act must have been done in order to commit extortion; The expression 'in order to' has been defined in the following ways:

"in order to" : for the purpose of¹³ "in order to" : with the purpose of doing¹⁴

'in order to commit extortion' clearly reveals that it is in the process of committing the offence of extortion.

14. Thus, it can be said in terms of Sections 386 (an aggravated form of 384 IPC) and 387 IPC that the former is an act in itself, whereas the latter is the process; it is a stage before committing an offence of extortion. The Legislature was mindful enough to criminalize the process by making it a distinct offence. Therefore, the commission of an offence of extortion is not sine qua non for an offence under this Section. It is safe to deduce that for prosecution under Section 387 IPC, the delivery of property is not necessary.

15. In *Radha Ballabh v. State of U.P.*¹⁵, this Court, while dealing with a case wherein ransom was demanded for releasing the child, observed that it could not be punishable under Section 386 IPC as no ransom was extorted. Therefore, the conviction was correctly made under Section 387 IPC. Similarly, in *Gursharan Singh v. State of Punjab*¹⁶, the Court upheld the conviction under Section 387 IPC where money extorted was not paid.

16. Further, in *Somasundaram v. State*¹⁷ a three-Judge Bench of this Court upheld the conviction under Section 387 IPC, along with other provisions, on the facts, where the deceased was tied with an iron chain and rope to a cot and threatened to part with crores of rupees or else execute the document in their favour. On his failure to do so, the deceased was killed. Thus, even though there was no delivery of property, the conviction was upheld by observing that Section 387 IPC is a heightened, more serious form of the offence of extortion in which the victim is put in fear of death or grievous hurt.

17. After going through the penal provisions related to extortion, it is also imperative to peruse the necessary principles of quashing, laid down by this Court through various judicial pronouncements which govern the jurisdiction of the High Court under Section 482 CrPC.

18. This Court in *B.N. John v. State of U.P.*¹⁸, reiterated several principles of quashing criminal cases/complaints/FIR as laid down, back in the days in *Bhajan Lal* (supra):

"102. In the backdrop of the interpretation of the various relevant provisions of the Code under Chapter XIV and of the principles of law enunciated by this Court in a series of decisions relating to the exercise of the extraordinary power under Article 226 or the inherent powers under Section 482 of the Code which we have extracted and reproduced above, we have given the following categories of cases by way of illustration wherein such power could be exercised either to prevent abuse of the process of any court or otherwise to secure the ends of justice, though it may not be possible to lay down any precise, clearly defined and sufficiently channelized and inflexible guidelines or rigid formulae and to give an exhaustive list of myriad kinds of cases wherein such power should be exercised.

(1) Where the allegations made in the first information report or the complaint, even if they are taken at their face value and accepted in their entirety do not prima facie constitute any offence or make out a case against the accused.

(2) Where the allegations in the first information report and other materials, if any, accompanying the FIR do not disclose a cognizable offence, justifying an investigation by police officers under Section 156(1) of the Code except under an order of a Magistrate within the purview of Section 155(2) of the Code.

(3) Where the uncontroverted allegations made in the FIR or complaint and the evidence collected in support of the same do not disclose the commission of any offence and make out a case against the accused.

(4) Where, the allegations in the FIR do not constitute a cognizable offence but constitute only a non-cognizable offence, no investigation is permitted by a police officer without an order of a Magistrate as contemplated under Section 155(2) of the Code.

(5) Where the allegations made in the FIR or complaint are so absurd and inherently improbable on the basis of which no prudent person can ever reach a just conclusion that there is sufficient ground for proceeding against the accused.

(6) Where there is an express legal bar engrafted in any of the provisions of the Code or the concerned Act (under which a criminal proceeding is instituted) to the institution and continuance of the proceedings and/or where there is a specific provision in the Code or the concerned Act, providing efficacious redress for the grievance of the aggrieved party.

(7) Where a criminal proceeding is manifestly attended with mala fide and/or where the proceeding is maliciously instituted with an ulterior motive for wreaking vengeance on the accused and with a view to spite him due to private and personal grudge."

In **Dalip Kaur v. Jagnar Singh**¹⁹ -

11. There cannot furthermore be any doubt that the High Court would exercise its inherent jurisdiction only when one or the other propositions of law, as laid down in *R. Kalyani v. Janak C. Mehta* [(2009) 1 SCC 516 : (2009) 1 SCC (Cri) 567] is attracted, which are as under: (SCC p. 523, para 15)

"(1) The High Court ordinarily would not exercise its inherent jurisdiction to quash a criminal proceeding and, in particular, a first information report unless the allegations contained therein, even if given face value and taken to be correct in their entirety, disclosed no cognizable offence.

(2) For the said purpose the Court, save and except in very exceptional circumstances, would not look to any document relied upon by the defence.

(3) Such a power should be exercised very sparingly. If the allegations made in the FIR disclose commission of an offence, the Court shall not go beyond the same and pass an order in favour of the accused to hold absence of any mens rea or actus reus.

(4) If the allegation discloses a civil dispute, the same by itself may not be a ground to hold that the criminal proceedings should not be allowed to continue."

(Emphasis supplied)

A three-Judge Bench of this Court, while summarizing the principles of quashing in **Neeharika Infrastructure (P) Ltd. v. State of Maharashtra**²⁰, has held that the power of quashing should be exercised sparingly with circumspection in the 'rarest of rare cases' and not as an ordinary rule:

"13.4. The power of quashing should be exercised sparingly with circumspection, in the "rarest of rare cases". (The rarest of rare cases standard in its application for quashing under Section 482CrPC is not to be confused with the norm which has been formulated in the context of the death penalty, as explained previously by this Court.)

13.7. Quashing of a complaint/FIR should be an exception and a rarity than an ordinary rule.

13.15. When a prayer for quashing the FIR is made by the alleged accused, the Court when it exercises the power under Section 482CrPC, only has to consider whether or not the allegations in the FIR disclose the commission of a cognizable offence and is not required to consider on merits whether the allegations make out a cognizable offence or not and the Court has to permit the investigating agency/police to investigate the allegations in the FIR."

OUR VIEW

19. It is a well-settled principle of law that penal statutes must be given strict interpretation. The Court ought not to read anything into a statutory provision that imposes penal liability.

20. A Constitution Bench of this Court in *Tolaram Relumal* (supra) has observed:

"8. and it is a well-settled rule of construction of penal statutes that if two possible and reasonable constructions can be put upon a penal provision, the Court must lean towards that construction which exempts the subject from penalty rather than the one which imposes penalty. It is not competent for the Court to stretch the meaning of an expression used by the Legislature in order to carry out the intention of the Legislature. As pointed out by Lord Macmillan in *London & North Eastern Railway Co. v. Berriman* [*London & North Eastern Railway Co. v. Berriman*, 1946 AC 278 at p. 295 (HL)] : (AC p. 295)

"Where penalties for infringement are imposed it is not legitimate to stretch the language of a rule, however, beneficent its intention, beyond the fair and ordinary meaning of its language."

21. In ***M. Narayanan Nambiar v. State of Kerala***²¹, this Court reiterated the observations made by the Privy Council in respect of the interpretation of penal statutes:

"10. A decision of the Judicial Committee in '*Francis Hart Dyke (Appellant) and Henry William Elliott, and the owners of the steamtug or Vessel 'Gauntlet'*' [Law Reports Privy Council Appeals (4) 1872, p. 184] cited by the learned counsel as an aid for construction neatly states the principle and therefore may be extracted : Lord Justice James speaking for the Board observes at p. 19:

"No doubt all penal Statutes are to be construed strictly, that is to say, the Court must see that the thing charged as an offence is within the plain meaning of the words used, and must not strain the words on any notion that there has been a slip, that there has been a *casus omissus*, that the thing is so clearly within the mischief that it must have been intended to be included if thought of.

On the other hand, the person charged has a right to say that the thing charged although within the words, is not within the spirit of the enactment. But where the thing is brought within the words and within the spirit, there a penal enactment is to be construed, like any other instrument, according to the fair common sense meaning of the language used, and the Court is not to find or make any doubt or ambiguity in the language of a penal statute, where such doubt or ambiguity would clearly not be found or made in the same language in any other instrument."

22. A three-Judge Bench of this Court has also observed in Dilip Kumar Sharma (supra) that a penal provision must be strictly construed; that is to say, in the absence of clear, compelling language, the provision should not be given a wider interpretation.

23. This Court in **R. Kalyani v. Janak C. Mehta**²², while discussing the strict interpretation of penal statutes has held:

"37. Maxwell in *The Interpretation of Statutes* (12th Edn.) says:

"The strict construction of penal statutes seems to manifest itself in four ways: in the requirement of express language for the creation of an offence; in interpreting strictly words setting out the elements of an offence; in requiring the fulfilment to the letter of statutory conditions precedent to the infliction of punishment; and in insisting on the strict observance of technical provisions concerning criminal procedure and jurisdiction."

38. In *Craies Statute Law* (7th Edn. at p. 529) it is said that penal statutes must be construed strictly. At p. 530 of the said treatise, referring to *U.S. v. Wiltberger* [5 L Ed 37 : 18 US (5 Wheat.) 76 (1820)] it is observed, thus:

"The distinction between a strict construction and a more free one has, no doubt, in modern times almost disappeared, and the question now is, what is the true construction of the statute? I should say that in a criminal statute you must be quite sure that the offence charged is within the letter of the law. This rule is said to be founded on the tenderness of the law for the rights of individuals, and on the plain principle that the power of punishment is vested in the Legislature, and not in the judicial department, for it is the Legislature, not the Court, which is to define a crime and ordain its punishment."

24. The scope of the provision cannot be extended by reading into it words which are not there. Section 387 IPC, being a penal provision, has to be strictly interpreted, and no condition/essential ingredient can be read into it that the Statute/Section does not prescribe. Since there is no ambiguity in the ingredients of Section 387 IPC, the observations of Tolaram Relumal (supra) as contended

by the learned counsel appearing for Respondent No.2 would not come to his rescue.

25. The reasoning adopted by the High Court is, on the face of it, flawed and misplaced. When the Legislature has created two separate offences with distinct ingredients and punishments, then assigning the essential ingredient of one to another is not a correct approach adopted by the High Court. Nowhere does the Section say that extortion has to be committed while putting a person in fear of death or grievous hurt. Instead, it is the other way around, that is to say, putting a person in fear of death or grievous hurt to commit extortion.

Extortion is not yet committed; it is in the process of committing it that a person is put in fear. Putting a person in fear would make an accused guilty of an offence under Section 387 IPC; it need not satisfy all the ingredients of extortion provided under Section 383 IPC. The High Court ought not to have relied on Dhananjay (supra) as that case, on the face of it, is clearly distinguishable on facts, the reason being it dealt with allegations of 384 IPC not 387 IPC, and discussed the elements of extortion.

26. Without going into the merits of the case, we are of the view that the instant case is not fit for quashing as the two essential ingredients for prosecution under Section 387 IPC, as discussed supra have been prima facie disclosed in the complaint, (a) that the complainant has been put in fear of death by pointing a gun towards him; and (b) that it was done to pressurize him to deliver Rs.5 lakhs.

The High Court, while quashing, has wrongly emphasized the fact that the said amount was not delivered; it failed to consider whether the money/property was delivered or not, is not even necessary as the accused is not charged with Section 384 IPC. The allegations of putting a person in fear of death or grievous hurt would itself make him liable to be prosecuted under Section 387 IPC. The natural corollary thereof is that the allegation of the criminal case being a counterblast is negated.

27. With the aforesaid observations, the appeal is accordingly allowed. The impugned order dated 28th June, 2024 is set aside, and the proceedings emanating from Complaint Case No.58 of 2022 are restored to the file of the Trial Court. Parties are directed to appear before the Trial Court on 12th August, 2025. Parties are further directed to fully cooperate and the hearing is expedited. Pending application(s), if any, are disposed of.

.....J. (Sanjay Karol)

.....J. (Manoj Misra)

New Delhi;

1 Hereinafter referred to as 'IPC'

2 Hereinafter 'accused'

3 FIR

4 Hereinafter referred to as 'CrPC'

5 Court of Additional Sessions Judge/Special Judge(Dacoit Prabhav Area) Jalaun
Place Orai

6 2007 (14) SCC 768

7 1992 Supp (1) SCC 335

8 2007 (12) SCC 1

9 1968 SCC OnLine SC310

10 (1976) 1 SCC 560

11 (1954) 1 SCC 961

12 (1986) 2 SCC 716

13 Merriam-Webster

14 Concise Oxford English Dictionary, Tenth Edition 1999

15 1995 Supp (3) SCC 119

16 (1996) 10 SCC 190

17 (2020) 7 SCC 722

18 2025 SCC OnLine SC 7

19 (2009) 14 SCC 696

20 (2021) 19 SCC 401

21 1962 SCC OnLine SC 85

22 (2009) 1 SCC 516

IN THE SUPREME COURT OF INDIA

Amlesh Kumar

Vs.

State of Bihar

**[Criminal Appeal No. _____ of 2025
arising out of SLP (Crl.) No. 5392 of 2024]**

HEADNOTE – Accused person has a right to voluntarily undergo a narco-analysis test, but at the appropriate stage of the trial, that is, when the accused is exercising his right to lead the evidence. Having said that, there is no indefeasible right of the accused to undergo a narco-analysis test as the right is dependent on many factors to be considered by the Court concerned

JUDGMENT

Sanjay Karol, J.

1. Leave Granted.

2. The present Appeal arises from the impugned Order dated 9th November 2023 passed in Criminal Miscellaneous No.71293 of 2023 by the High Court of Judicature at Patna, whereby the Court Crl.A.@ SLP(Crl.)No.5392/2024 Page 2 of 17 accepted the submission of the Sub-Divisional Police Officer, Mahua, that she would conduct narco-analysis test of all the accused persons (including the Appellant herein) and other witnesses, during the investigation.

3. Aggrieved thereof, the Appellant is before us. The significant ground of challenge taken is that the acceptance of such a submission by the High Court is in direct contravention of the exposition of law laid down by this Court in Selvi and Ors. v. State of Karnataka¹, wherein it was observed that forceful subjection of an individual to techniques, such as the narco-analysis test, violates personal liberty enshrined under Article 21 of the Constitution of India.

4. The brief facts giving rise to the Appeal at hand are as follows:

4.1. On 24th August 2022, FIR No.545 of 2022 was registered at P.S. Mahua under Sections 341, 342, 323, 363, 364, 498(A), 504, 506 and 34 of the Indian Penal Code, 18602, against the Appellant (husband) and his family. It was stated by the complainant therein that her sister got married to the Appellant on 11th December 2020, and thereafter, the accused persons had been making repeated demands for dowry and beating her. On 22nd August 2022, she received a call from the Appellant, informing that her sister had run away from the matrimonial

home. Despite searching, she is unable to locate her sister and suspects foul play by the accused persons (including the Appellant).

4.2. The case of the Appellant is that on 21st August 2022, while en route to Ayodhya, his wife got off the bus at Baabali Chawk for nature's call but never returned. He filed a complaint before P.S. Jahangir Ganj, recorded as GD No. 038, on 28th August 2022.

4.3. The admitted position is that the missing person (wife) has not been found to date. The mother, father and brothers of the Appellant have been granted bail by the High Court of Judicature at Patna.

4.4. The Appellant's prayer for regular bail came to be rejected vide Order dated 1st August 2023 passed by the Sessions Judge, Vaishali at Hajipur in B.P.No.1141 of 2023. The Court was not inclined to grant bail on the basis of the allegations made in the FIR, as well as the confessional statements of the co-accused, who stated that they had thrown the missing person in the river Saryu on the intervening night of the 21st and 22nd August 2022.

4.5. Dissatisfied with the Order of the Sessions Judge, the Appellant approached the High Court of Judicature at Patna for grant of a regular bail vide Crl. Misc. No.71293 of 2023. Vide the impugned interim Order, the High Court accepted the submission of the Sub-Divisional Police Officer, Mahua, that she will conduct a narco-analysis test of all the accused persons and posted the case for hearing on 12th July 2024. The relevant portion thereof is extracted below, for ready reference:

"2. Pursuant to the order dated 07.11.2023, the SubDivisional Police Officer, Mahua and the S.H.O. Mahua are present in the court.

3. The S.D.P.O. Mahua, assures this court that she will take further steps in the investigation to find out details about the missing woman and for that she has further submitted that she will get narco test of all the accused persons and other witnesses, if required in the investigation.

4. List this case on 12.07.2024. 5. On the next date of hearing, the investigation report shall be produced by the learned APP."

(Emphasis supplied)

4.6. Aggrieved thereof, the Appellant has preferred the present Appeal before this Court.

5. We have heard the learned counsel for the Appellant and the learned Addl. Standing Counsel on behalf of the Respondent State. After hearing the parties in

part, vide Order dated 22nd April 2025, this Court appointed Mr. Gaurav Agrawal, Senior Advocate, as an Amicus Curiae to assist the Court, given the issues involved. We have heard the learned Amicus Curiae and the learned counsel for the parties as also perused the written submissions filed.

6. Consequently, the issues which arise for consideration of this Court are:

i. Firstly, whether in the attending facts and circumstances, the High Court could have accepted such a submission.

ii. Secondly, whether a report of a voluntary narco-analysis test can form the sole basis of conviction in the absence of other evidence on record.

iii. Lastly, whether an accused can voluntarily seek a narcoanalysis test, as a matter of an infeasible right.

7. For the purposes of clarity, a narco-analysis test is an interrogation method whereby a suspect of a crime is injected with a psychoactive drug under controlled conditions to suppress their reasoning power or the ability to determine what is good/bad for themselves.³ As submitted by the learned Amicus Curiae, the drug used for this test is sodium pentothal, which is also used in higher dosages for inducing general anesthesia in surgeries.

8. However, conducting such tests on persons accused of committing a crime raises serious questions, vis-à-vis, the constitutional protection granted from compulsion to become a witness against oneself under Article 20(3). The constitutional validity of this test, along with similar tests like the polygraph test, came to be challenged before this Court in Selvi (supra). After an elaborate discussion, this Court (three-Judge Bench) held involuntary administration of this test to be hit by Articles 20(3) and 21 of the Constitution. The following principles came to be expounded:

8.1. Articles 20 and 21 of the Constitution are non-derogable and sacrosanct rights to which the judiciary cannot carve out exceptions;

8.2. Involuntary administration of narco-analysis and similar tests is in contravention of the protection given by Article 20(3) of the Constitution, i.e. the right against selfincrimination;

8.3. The results of such involuntary tests cannot be considered as 'material evidence' in the eyes of the law;

8.4. Conducting such tests in the absence of consent violates 'substantive due process' - which is an essential element required for restraining one's personal

liberty. Permitting such tests may lead to a disproportionate exercise of police powers;

8.5. The boundaries of privacy of a person are also breached when these tests are conducted without consent; and

8.6. For voluntary tests, it must be ensured that appropriate safeguards are in place. Moreover, the results of the same cannot be admitted directly as evidence. Pertinently, any fact or information that is discovered subsequent thereto, with the help of the information supplied in the result, can be admitted into evidence with the aid of Section 27 of the Indian Evidence Act 1872.

9. From the above exposition of law, it is clear that under no circumstances, is an involuntary or forced narco-analysis test permissible under law. Consequently, a report of such involuntary test or information that is discovered subsequently is also not per se admissible as evidence in criminal or other proceedings.

10. Adverting to the facts at hand, we cannot find a reason in the High Court accepting a submission by the Investigating Officer, stating that they will conduct a narco-analysis test of all the accused persons. Such a submission and its acceptance, is in direct contravention to the judgment of this Court in Selvi (supra), being hit by the protections under Articles 20(3) and 21 of the Constitution.

11. Moreover, we fail to understand how such an endeavour was accepted by the High Court when adjudicating an application for regular bail under Section 439 of the Code of Criminal Procedure, 1973. It is settled law that while entertaining an application for grant of bail, the Court has to take into consideration the allegations against the accused; period of custody undergone; nature of evidence and the crime in question; likelihood of influencing witnesses and other such relevant grounds. It does not involve entering into a roving enquiry or accepting the use of involuntary investigative techniques. In similar circumstances, where the High Court had ordered lie detector, brain mapping and narco-analysis tests, this Court in Sangitaben Shaileshbhai Datana v. State of Gujarat⁴, observed:

"6. Having heard the counsel for the parties, it is surprising to note the present approach adopted by the High Court while considering the bail application. The High Court ordering the abovementioned tests is not only in contravention to the first principles of criminal law jurisprudence but also violates statutory requirements. While adjudicating a bail application, Section 439 of the Code of Criminal Procedure, 1973 is the guiding principle wherein the court takes into consideration, inter alia, the gravity of the crime, the character of the evidence, position and status of the accused with reference to the victim and witnesses, the likelihood of the accused fleeing from justice and repeating the offence, the

possibility of his tampering with the witnesses and obstructing the course of justice and such other grounds.

Each criminal case presents its own peculiar factual matrix, and therefore, certain grounds peculiar to a particular case may have to be taken into account by the court. However, the court has to only opine as to whether there is a prima facie case against the accused. The court must not undertake meticulous examination of the evidence collected by the police, or rather order specific tests as done in the present case.

7. In the instant case, by ordering the abovementioned tests and venturing into the reports of the same with meticulous details, the High Court has converted the adjudication of a bail matter to that of a mini trial indeed. This assumption of function of a trial court by the High Court is deprecated."

(Emphasis supplied)

12. We are not inclined to accept the submission of the Respondent- State that since modern investigative techniques are the need of the hour, the High Court was correct in accepting the submission that narco-analysis test of all accused persons will be conducted. While the need for modern investigative techniques may be true, such investigative techniques cannot be conducted at the cost of constitutional guarantees under Articles 20(3) and 21.

13. Therefore, the first question framed is answered in the negative. The High Court has erred in accepting a submission to carry out a narco-analysis test of all accused persons by the Investigating Officer.

14. In the course of proceedings, the issue of undergoing a narcoanalysis test voluntarily came to be raised, which brings us to the second question framed. As discussed above, this Court in Selvi (supra) had considered voluntary narco-analysis tests and opined that the reports thereof cannot be admitted directly into evidence. Information that is discovered, as a consequence thereof, can be admitted with the aid of Section 27 of the Indian Evidence Act, 1872.

15. The evidentiary value of information received through the aid of Section 27 is no longer res integra. This Court in Vinobhai v. State of Kerala⁵, while placing reliance on Manoj Kumar Soni v. State of M.P.⁶ held that in the absence of supporting evidence, a conviction cannot be based solely on such information. It was observed:

"8. The law relating to the evidentiary value of recovery made under Section 27 of the Indian Evidence Act, 1872 is settled by this Court in the case of Manoj Kumar Soni v. State of M.P.. Paragraph 22 of the said decision reads thus:-

"22. A doubt looms : can disclosure statements per se, unaccompanied by any supporting evidence, be deemed adequate to secure a conviction? We find it implausible. Although disclosure statements hold significance as a contributing factor in unriddling a case, in our opinion, they are not so strong a piece of evidence sufficient on its own and without anything more to bring home the charges beyond reasonable doubt." Therefore, in our view, the appellant's guilt was not proved beyond a reasonable doubt."

16. Consequently, in our view, a report of a voluntary narcoanalysis test with adequate safeguards as well in place, or information found as a result thereof, cannot form the sole basis of conviction of an accused person. The second question is, therefore, answered in the negative.

17. Adverting to the last question framed, the learned Amicus Curiae has pointed out that there has been a divergence of views taken by High Courts on the issue as to whether a narco-analysis test can be claimed by an accused as a matter of right. Given the suspect nature of a report of narco-analysis, the Amicus Curiae submitted that this position must be clarified.

18. On the one hand, there is High Court of Judicature at Allahabad in *Rajesh Talwar v. CBI*⁷; High Court of Bombay in *Dominic Luis v. State*⁸ and *Mohd. Samir v. State*⁹; High Court of Delhi in *Ashwini Kumar Upadhyay v. Union of India*¹⁰; High Court of Kerala in *Louis v. State of Kerala*¹¹; High Court of Gujarat in *State of Gujarat v. Sanjay Kumar Kanchanlal Desai*¹² and High Court of Punjab & Haryana in *Navjeet Kaur v. State of Punjab*¹³, have held that an involuntary narco-analysis test cannot be relied on and have taken an overall view of the circumstances when an accused has sought a narco-analysis test himself.

19. On the other hand, there is Rajasthan High Court, which in *Sunil Bhatt v. State*¹⁴, held that the accused can seek a narcoanalysis test at a relevant stage in view of the statutory right to lead evidence in defence under Section 233 of the Criminal Procedure Code.

20. In our view, as rightly submitted by the learned Amicus, the above view of the Rajasthan High Court cannot be sustained. It cannot be said that undergoing a narco-analysis test is part of the indefeasible right to lead evidence, given its suspect nature, and moreover, we find the same to be in the teeth of the judgment of this Court in *Selvi* (supra). It had been categorically observed:

"240. We must also contemplate situations where a threat given by the investigators to conduct any of the impugned tests could prompt a person to make incriminatory statements or to undergo some mental trauma. Especially in cases of individuals from weaker sections of society who are unaware of their

fundamental rights and unable to afford legal advice, the mere apprehension of undergoing scientific tests that supposedly reveal the truth could push them to make confessional statements. Hence, the act of threatening to administer the impugned tests could also elicit testimony.

It is also quite conceivable that an individual may give his/her consent to undergo the said tests on account of threats, false promises or deception by the investigators. For example, a person may be convinced to give his/her consent after being promised that this would lead to an early release from custody or dropping of charges. However, after the administration of the tests, the investigators may renege on such promises. In such a case the relevant inquiry is not confined to the apparent voluntariness of the act of undergoing the tests, but also includes an examination of the totality of circumstances.

253. We are of the view that an untrammelled right of resorting to the techniques in question will lead to an unnecessary rise in the volume of frivolous litigation before our courts.

264. In light of these conclusions, we hold that no individual should be forcibly subjected to any of the techniques in question, whether in the context of investigation in criminal cases or otherwise. Doing so would amount to an unwarranted intrusion into personal liberty. However, we do leave room for the voluntary administration of the impugned techniques in the context of criminal justice, provided that certain safeguards are in place.

Even when the subject has given consent to undergo any of these tests, the test results by themselves cannot be admitted as evidence because the subject does not exercise conscious control over the responses during the administration of the test. However, any information or material that is subsequently discovered with the help of voluntarily administered test results can be admitted in accordance with Section 27 of the Evidence Act, 1872."

(Emphasis supplied)

21. In view of the above exposition in Selvi (Supra), the third question is answered in the following terms: The accused has a right to voluntarily undergo a narcoanalysis test at an appropriate stage. We deem it appropriate to add, that the appropriate stage for such a test to be conducted is when the accused is exercising his right to lead evidence in a trial.

However, there is no indefeasible right with the accused to undergo a narcoanalysis test, for upon receipt of such an application the concerned Court, must consider the totality of circumstances surrounding the matter, such as free consent, appropriate safeguards etc., authorizing a person to undergo a voluntary

narco-analysis test. We deem it appropriate to reproduce and reiterate the guidelines issued in Selvi (Supra) in this regard as follows:

"265. The National Human Rights Commission had published Guidelines for the Administration of Polygraph Test (Lie Detector Test) on an Accused in 2000. These Guidelines should be strictly adhered to and similar safeguards should be adopted for conducting the "narcoanalysis technique" and the "Brain Electrical Activation Profile" test. The text of these Guidelines has been reproduced below:

(i) No lie detector tests should be administered except on the basis of consent of the accused. An option should be given to the accused whether he wishes to avail such test.

(ii) If the accused volunteers for a lie detector test, he should be given access to a lawyer and the physical, emotional and legal implication of such a test should be explained to him by the police and his lawyer.

(iii) The consent should be recorded before a Judicial Magistrate.

(iv) During the hearing before the Magistrate, the person alleged to have agreed should be duly represented by a lawyer.

(v) At the hearing, the person in question should also be told in clear terms that the statement that is made shall not be a "confessional" statement to the Magistrate but will have the status of a statement made to the police.

(vi) The Magistrate shall consider all factors relating to the detention including the length of detention and the nature of the interrogation.

(vii) The actual recording of the lie detector test shall be done by an independent agency (such as a hospital) and conducted in the presence of a lawyer.

(viii) A full medical and factual narration of the manner of the information received must be taken on record."

22. Before parting with this appeal, we place on record our appreciation for the learned Amicus Curiae, Mr. Gaurav Agrawal, Senior Advocate, in extending his invaluable assistance to the Court.

23. Keeping in view the above discussion, we have no doubt that the impugned Order cannot be sustained. Consequently, the impugned Order dated 9th November 2023 passed in Criminal Miscellaneous No. 71293 of 2023 by the High Court of Judicature at Patna is hereby set aside.

24. The bail application of the Appellant, pending if any, to be decided in accordance with law.

25. In the attending facts and circumstances of this case, the Appeal is allowed. Pending application(s), if any, shall stand disposed of.

.....**J. (Sanjay Karol)**

.....**J. (Prasanna B. Varale)**

New Delhi.

June 09, 2025

1 (2010) 7 SCC 263.

2 Hereinafter 'IPC'.

3 B R Sharma, Forensic Science in Criminal Investigation & Trials, Sixth Edition, 2020 -Paragraph 32.1.1.

4 (2019) 14 SCC 522.

5 2025 SCC Online SC 178.

6 2023 SCC OnLine SC 984.

7 2013 SCC Online All 5533.

8 2014 SCC Online Bom 452.

9 2017 SCC Online Bom 19.

10 2023 SCC Online Del 3816.

11 2021 SCC Online Ker 4519.

12 2014 SCC Online Guj 6150.

13 2015 SCC Online P&H 15351.

14 2022 SCC Online Raj 1443.

4. Study Material-G.K.

VEDIC AGE

The **Vedic Age (around 1500–500 BCE)** is characterized by the composition of the Vedas, which are the oldest sacred texts of Hinduism. Its significance lies in its role in transitioning from a semi-nomadic lifestyle to settled agriculture and establishing foundational social, political, and religious structures that shaped subsequent Indian civilization.

Origin of Vedic Age

The origin of Vedic Age can be seen in the following points as mentioned below:

- **Migration and Settlement** – The Vedic Age began with the migration of the Indo-Aryans from the northwestern regions (modern-day Iran, Afghanistan, and Central Asia) into the Indian subcontinent, particularly the Punjab and the Sarasvati River basin.
- **Drivers of Migration** – The migration was likely driven by climatic changes and a search for new resources, leading the Indo-Aryans to settle in fertile plains.
- **Early Texts** – The Rigveda, composed in Sanskrit, is the primary source for understanding this period, reflecting the pastoral and agrarian lifestyle of the Indo-Aryans.
- **Religious and Social Organization** – The Rigveda reveals the Indo-Aryans' reverence for natural forces and the early stages of their social and religious organization.
- **Foundational Influence** – The Vedic Age laid the foundational social and religious structures that influenced the subsequent periods of Indian history.

Primary Sources of Vedic Age

The primary sources of the **Vedic Age** include the **Vedas**, which are the oldest sacred texts of India. These are divided into four main collections:-

- Rig Veda,
- Sama Veda,
- Yajur Veda, and
- Atharva Veda

Rigveda

- The Rigveda, the oldest and most significant of the Vedas, comprises 1,028 hymns organized into ten books or mandalas.

- These hymns were composed in praise of various deities like Agni, Indra, and Soma and offer insights into the early Vedic society's religious beliefs, rituals, and way of life.

Samaveda

- The Samaveda, often referred to as the “**Veda of Melodies**,” primarily focuses on **musical chants** derived from the Rigveda.
- These hymns were sung by a **special class of priests called Udgatar** during important religious ceremonies, emphasizing the role of music and melody in Vedic rituals.

Yajurveda

- The Yajurveda is divided into the **Black (Krishna) and White (Shukla) Yajurveda**, containing both the **mantras and the ritualistic instructions** for their use.
- It played a crucial role in guiding the priests on how to perform various **sacrificial rites**, which were central to Vedic religion.

Atharvaveda

- The Atharvaveda is distinct from the other Vedas, as it includes not only hymns and prayers but also spells, incantations, and rituals related to everyday life, such as **healing, protection from evil, and ensuring prosperity**.
- It reflects the more **practical and mystical aspects** of Vedic society.

The Brahmanas

- The Brahmanas are prose **texts attached to each of the Vedas**, serving as **detailed commentaries on the hymns**.
- They provide instructions on how to perform Vedic rituals and sacrifices, explaining their **symbolic meanings and the significance of various ceremonies**.
- The Brahmanas also delve into the **mystical and esoteric aspects** of the rituals, offering insight into the early religious practices of the Vedic period.

The Aranyakas

- The Aranyakas, or “**Forest Treatises**,” represent a transition from ritualistic worship to philosophical contemplation.

- Composed by sages who retreated to the forests, these texts are more **introspective, focusing on meditation, moral values, and the symbolic meaning behind rituals.**
- They serve as a bridge between the ritualistic Brahmanas and the more abstract Upanishads, gradually leading to a **deeper spiritual understanding.**

The Upanishads

- The Upanishads are considered the **culmination of Vedic thought**, focusing on **spiritual and philosophical inquiries** into the nature of reality, the self (Atman), and the ultimate truth (Brahman).
- These texts explore profound concepts such as **karma, moksha (liberation), and the unity of the individual soul with the universal spirit.**
- The Upanishads mark the shift from **external ritual to internal meditation and contemplation**, laying the foundation for later philosophical traditions in India.

Society of Vedic Period

- The **society of the Vedic period** in ancient India was primarily agrarian and organized around kinship structures.
- The **Early Vedic Age** was characterized by a tribal system where the family unit, led by the patriarch, was the primary social unit.
- The society was relatively egalitarian, with minimal class distinctions, and rituals centered around fire worship and hymns.
- However, during the **Later Vedic Age**, society became more stratified with the emergence of the varna system, which later evolved into the caste system.
- The role of the Brahmins (priests) became more prominent, and social hierarchies became more rigid, reflecting a shift towards a more complex and organized social structure.

Political Life of Vedic Period

- The political life of the Vedic period was initially tribal and organized around small, kin-based communities.
- During the **Early Vedic Age**, governance was led by tribal chieftains known as rajas, who were selected by the tribe and were responsible for leading the community in war and maintaining order.
- The **raja** was assisted by a group of advisers, including priests, warriors, and other tribal leaders, in decision-making processes.

- As society evolved into the **Later Vedic Age**, the concept of kingship became more formalized, with hereditary monarchy becoming common.

Religion of Vedic Period

- The religion of the Vedic period was rooted in nature worship and a pantheon of deities, each representing different aspects of the natural world and human experience.
- During the **Early Vedic Age**, the most important deities included Indra (god of rain and thunder), **Agni** (god of fire), and **Varuna** (upholder of cosmic order).
- These gods were worshipped through elaborate rituals and sacrifices (Yajnas), performed by priests (Brahmins) who chanted hymns from the Rigveda, the oldest of the Vedas.
- As society transitioned into the **Later Vedic Age**, the religious practices became more complex, with the development of a more structured and hierarchical pantheon.
- **Prajapati**, the creator god, and **Rudra** (a precursor to Shiva) gained prominence.
- The concept of **Brahman** (the universal soul) and **Atman** (the individual soul) also started to emerge, laying the foundation for later philosophical thought in Hinduism.

Vedic Literature

- Vedic literature, the oldest sacred texts of Hinduism, includes four primary collections:
 - **The Rigveda,**
 - **The Samaveda,**
 - **The Yajurveda, and**
 - **The Atharvaveda.**
- These texts consist of hymns, rituals, and philosophical teachings, serving as the foundation of Vedic religion and culture.
- The Vedas were supplemented by the **Brahmanas**, **Aranyakas**, and **Upanishads**, which provide detailed instructions for rituals, meditative practices, and discussions on metaphysical concepts.

Vedic Philosophy

- **Vedic philosophy**, rooted in the Vedic texts, emphasizes the concepts of **Rita** (cosmic order) and **Dharma** (moral duty), which govern the universe and human life.

- It explores the nature of reality, the **self (Atman)**, and the **ultimate reality (Brahman)**, seeking to understand the connection between the individual soul and the cosmic principle.
- Vedic thought also includes discussions on **karma, the cycle of rebirth, and the pursuit of liberation (Moksha)** through knowledge and righteous living.

Conclusion

The Vedic Age is a defining epoch that significantly impacted the trajectory of Indian civilization. Through the migration and settlement of the Indo-Aryans, the composition of the Vedic texts, and the establishment of early social and religious frameworks, this period provided a foundational influence on subsequent Indian history. As India transitioned into more complex societal structures, the legacy of the Vedic Age continued to resonate, shaping the cultural and philosophical landscape of the nation.

5. Study Material-Language

Active and Passive Voice

Active to Passive Voice Rules & Examples: Understanding active and passive voice is a key step in mastering English grammar, especially for students aiming to improve their writing and communication skills. Whether you're preparing for exams, writing essays, or simply trying to express ideas more clearly, knowing how to use both voices correctly can make your language more effective and professional.

Active Voice

In active voice, the subject of the sentence does the action.

Structure of Active Voice:

Subject + Verb + Object

Examples:

- *She (subject) writes (verb) a letter (object).*
- *The dog (subject) chased (verb) the cat (object).*
- *They play football every day.*

In all these sentences, the subject is performing the action.

Passive Voice

In passive voice, the object of the action becomes the subject of the sentence. The focus is on the action, not on who does it.

Structure of Passive Voice:

Object + Form of "be" + Past Participle + (by + Subject) (optional)

Examples:

A letter (object) is written (form of "be" + past participle) by her (subject).

The cat was chased by the dog.

Football is played by them every day.

In passive voice, the action is more important than the doer.

Active vs Passive Voice: Simple Comparison

To better understand the difference between active and passive voice, it's helpful to look at how the structure of a sentence changes. In active voice, the subject performs the action, while in passive voice, the focus shifts to the object receiving the action.

Active Voice	Passive Voice
Subject + Verb + Object	Object + Verb + Subject
He paints a picture.	A picture is painted by him.
The teacher teaches English.	English is taught by the teacher.
The chef cooked dinner.	Dinner was cooked by the chef.
She will deliver the speech tomorrow.	The speech will be delivered by her tomorrow.
They are watching a movie.	A movie is being watched by them.

5 Basic Rules of Active and Passive Voice

Converting a sentence from active to passive voice involves a few important grammatical rules. Here are the **5 key steps** to follow:

1. Identify the Sentence Structure (S + V + O):

Begin by identifying the Subject, Verb, and Object in the active sentence.

Example: She (S) reads (V) a book (O).

2. Change the Object into the New Subject:

In passive voice, the **object** of the active sentence becomes the **subject**.

Passive: A book...

3. Use the Appropriate Form of the Verb 'To Be':

Match the new subject with the correct form of the verb “to be” according to the tense of the original sentence.

Active: She is reading a book.

Passive: A book is being read...

4. Use the Past Participle (V3) of the Main Verb:

Always use the past participle form of the main verb in the passive sentence.

Example: read → read, write → written, eat → eaten.

5. Change the Subject into the New Object (Optional):

If necessary, include the original subject at the end using "by", or omit it if it's not important.

Passive: A book is being read by her.

Or simply: A book is being read.

These rules help transform an active sentence into a grammatically correct passive structure while maintaining the original meaning.

When to Use Active vs Passive Voice

Understanding when to use active or passive voice helps you choose the best way to express your ideas. The decision depends on what you want to highlight — the doer of the action or the action itself. Here's a simple comparison:

Use Active Voice When	Use Passive Voice When
To make your sentence clear and direct	When the doer is unknown or not important
When the subject is important	To focus on the action or result
In creative writing, essays, or storytelling	In scientific or formal writing
<i>Example: The student solved the math problem.</i> (Here, the subject "student" is important.)	<i>Example: The experiment was completed successfully.</i> (We care about the experiment, not who did it.)

Focus of Each Voice:

- In active voice, the focus is on who is doing the action.
- In passive voice, the focus is on what is being done or the result of the action.

How to Change Active to Passive Voice: Step-by-Step Guide

Steps:

1. Identify the subject, verb, and object.
2. Move the object to the subject position.
3. Use the correct form of "be" based on the tense.
4. Use the past participle of the main verb.
5. Add "by + subject" (optional).

Example:

1. *Active: The boy reads a book.*

- Subject: The boy
- Verb: reads
- Object: a book

2. *Passive: A book is read by the boy.*

Active & Passive Voice – Tense-wise Examples

Understanding how to convert sentences between active and passive voice across different tenses is key to mastering English grammar. Each tense follows a specific structure when changed into passive form. Below is a clear comparison of active and passive voice using new examples for various tenses. This chart will help you see how verb forms shift and how the focus changes from the subject to the object.

Tense	Active Voice	Passive Voice
Present Simple	He writes the report.	The report is written by him.
Past Simple	She Painted the wall.	The wall was painted by her.
Future Simple	They will organize the event.	The event will be organized by them.
Present Continuous	The kids are cleaning the room.	The room is being cleaned by the kids.
Past Continuous	The team was preparing the presentation.	The presentation was being prepared by the team.
Going to	He is going to repair the car.	The car is going to be repaired by him.
Present Perfect	She has written a poem.	A poem has been written by her.
Past Perfect	They had finished the work.	The work had been finished by them.
Infinitive	He has to complete the form.	The form has to be completed by him.

Q1–Q50: Convert the following active voice sentences into passive voice.

1. She sings a song.
2. They are playing cricket.
3. He completed the project.
4. The team will win the match.

5. The manager has approved the leave.
6. The chef cooks delicious meals.
7. The students were solving the questions.
8. Someone has stolen my wallet.
9. We celebrate Independence Day on 15th August.
10. The company will launch a new product next week.
11. She wrote a poem.
12. They are watching a movie.
13. The teacher explains the lesson.
14. He will deliver the parcel.
15. I had finished the work.
16. They have cleaned the classroom.
17. The artist is painting a portrait.
18. He buys vegetables every day.
19. The cat chased the mouse.
20. They were playing football.
21. She is reading a novel.
22. The boy broke the window.
23. The nurse is taking care of the patient.
24. They will organize the event.
25. He was repairing the car.
26. We invited our friends to the party.
27. She has written a story.
28. They had completed the assignment.
29. He is watering the plants.
30. Someone has called the doctor.
31. They serve lunch at noon.
32. He will paint the house.
33. We are planting trees.
34. She will bake a cake.
35. The mechanic fixed the engine.
36. The librarian issues books to students.
37. He had locked the door.
38. She is singing a beautiful song.
39. They were cleaning the park.
40. I mailed the letters yesterday.
41. The police caught the thief.
42. She draws cartoons.
43. We have watched that show.
44. They are decorating the hall.
45. The manager was reviewing the report.
46. The children pluck flowers from the garden.
47. The workers are constructing a bridge.
48. He has washed the clothes.

- 49.They will complete the work soon.
- 50.She mailed the invitation cards.

Answers:

1. A song is sung by her.
2. Cricket is being played by them.
3. The project was completed by him.
4. The match will be won by the team.
5. The leave has been approved by the manager.
6. Delicious meals are cooked by the chef.
7. The questions were being solved by the students.
8. My wallet has been stolen (by someone).
9. Independence Day is celebrated on 15th August.
- 10.A new product will be launched by the company next week.
- 11.A poem was written by her.
- 12.A movie is being watched by them.
- 13.The lesson is explained by the teacher.
- 14.The parcel will be delivered by him.
- 15.The work had been finished by me.
- 16.The classroom has been cleaned by them.
- 17.A portrait is being painted by the artist.
- 18.Vegetables are bought by him every day.
- 19.The mouse was chased by the cat.
- 20.Football was being played by them.
- 21.A novel is being read by her.
- 22.The window was broken by the boy.
- 23.The patient is being taken care of by the nurse.
- 24.The event will be organized by them.
- 25.The car was being repaired by him.
- 26.Our friends were invited to the party by us.
- 27.A story has been written by her.
- 28.The assignment had been completed by them.
- 29.The plants are being watered by him.
- 30.The doctor has been called (by someone).
- 31.Lunch is served at noon.
- 32.The house will be painted by him.
- 33.Trees are being planted by us.
- 34.A cake will be baked by her.
- 35.The engine was fixed by the mechanic.
- 36.Books are issued to students by the librarian.
- 37.The door had been locked by him.
- 38.A beautiful song is being sung by her.
- 39.The park was being cleaned by them.

40. The letters were mailed by me yesterday.
41. The thief was caught by the police.
42. Cartoons are drawn by her.
43. That show has been watched by us.
44. The hall is being decorated by them.
45. The report was being reviewed by the manager.
46. Flowers are plucked from the garden by the children.
47. A bridge is being constructed by the workers.
48. The clothes have been washed by him.
49. The work will be completed soon by them.
50. The invitation cards were mailed by her.

6. Current Affairs

JUNE 2025

1. India is the 4th largest contributor to UN Peacekeeping forces with over 5,300 personnel.
2. Bank of Baroda launches first 'Phygital' branch in Kolkata Zone.
3. SEBI approves ₹3,668 crore IPO of Hero FinCorp.
4. Grammarly raises \$1 billion to expand into an AI-based productivity platform.
5. Japan to provide \$1.063 billion to Bangladesh for budget, railways, and education.
6. Mona Agarwal wins silver in 10m Air Pistol SH1 at Para Shooting World Cup.
7. Three defence PSUs granted Miniratna Category-I status by Rajnath Singh.
8. President Murmu conferred Florence Nightingale Awards 2025 to 15 nurses.
9. World No Tobacco Day observed on 31 May to raise awareness on tobacco harms.
10. Goa declared fully functionally literate under ULLAS literacy programme.
11. Second phase of NAKSHA training to start from June 2 at 5 centres.
12. Bangladesh tribunal indicts Sheikh Hasina, calls her to court on June 16.
13. IBA and IOCL sign MoU to promote bioenergy and bio-hydrogen.
14. ADB announces \$10 billion plan to improve India's urban infrastructure.
15. Drools becomes India's first pet food unicorn after Nestlé's minority investment.
16. Aditya Birla Capital invests ₹249 crore in ABHFL via rights issue.
17. India wins 6 medals, including 4 gold, at Ulaanbaatar Open 2025.
18. Eureka Forbes appoints Shraddha Kapoor as brand ambassador for vacuum cleaners.
19. Miss Thailand wins Miss World 2025 crown at Hyderabad event.
20. Jharkhand to open its first tiger safari in Barwadih forest area.
21. Government issues guidelines to boost electric car manufacturing in India.
22. Mohammadreza Shadloui fetches ₹2.23 crore in PKL 12, sets auction record.
23. Srihari Nataraj clocks fastest-ever Indian time in 200m freestyle at Singapore Nationals.

24. India finishes second with 24 medals at 2025 Asian Athletics Championships.
25. Glenn Maxwell retires from ODIs to focus on 2026 T20 World Cup.
26. Kabaddi star Pardeep Narwal retires at 28 after going unsold in PKL auction.
27. D Gukesh scores first classical win over Magnus Carlsen at Norway Chess 2025.
28. Ukraine carries out its longest-range drone strike, damaging 40+ Russian aircraft.
29. Air Marshal Manish Khanna takes over command of Southern Air Command.
30. India to build its first Polar Research Vessel with Norway's Kongsberg.
31. Gujarat achieves 100% rail electrification with launch of 9,000 HP locomotive.
32. India wins presidency of the International Institute of Administrative Sciences for 2025–2028.
33. Lee Jae-myung elected as 21st President of South Korea.
34. Vietnam ends two-child policy to combat aging population and low birth rates.
35. China may order up to 500 Airbus aircraft during EU leaders' visit to Beijing.
36. HDB Financial Services gets SEBI nod for ₹12,500 crore IPO.
37. Paytm Cloud incorporates Paytm Singapore as a wholly owned subsidiary.
38. Sumit Khandelwal appointed as new CFO of UCO Bank.
39. Mount Etna erupts in Italy, spews ash and lava.
40. Strawberry Moon in June to appear lowest on the horizon in decades.
41. Geneva to host second session of global plastic pollution treaty talks from August 5 to 14, 2025.
42. India elected to UN Economic and Social Council for 2026–2028 term.
43. Karol Nawrocki wins Polish presidential election with 50.9% votes, defeating pro-EU candidate.
44. June observed as Men's Health Month to raise awareness about men's well-being.
45. India to need 1 million AI professionals by 2026; AI education and tech sector on the rise.
46. PSG wins Champions League for the first time with record 5–0 win over Inter Milan.
47. RCB wins IPL title for the first time, ending Virat Kohli's 18-year-long wait.
48. IIT Delhi and AIIMS sign MoU to set up AI research centre in healthcare.
49. World Environment Day 2025 to focus on ending plastic pollution; South Korea to host global celebrations.

50. Two Rajasthan wetlands added to Ramsar list, taking India's total to 91 sites.
51. Census 2027 to include caste data, will be held in two phases across India.
52. Central Bank of India buys stake in Future Generali worth ₹451 crore.
53. Flipkart gets RBI nod to lend directly to customers and sellers via NBFC licence.
54. Government launches 'Ayush Nivesh Saarthi' portal to boost investment in traditional medicine.
55. Sara Errani and Andrea Vavassori win French Open 2025 mixed doubles title.
56. S Mahendra Dev appointed as new Chairman of Economic Advisory Council to PM.
57. Sudarshan Venu appointed Chairman and MD of TVS Motor effective August 25, 2025.
58. Kumar Mangalam Birla receives USISPF Global Leadership Award 2025.
59. MoSPI releases 'EnviStats India 2025' on World Environment Day.
60. Khichan and Menar wetlands in Rajasthan designated as new Ramsar sites.
61. Union Minister Kiren Rijiju Unveils UMEED Portal for Transparent Waqf Property Management
62. PM Modi Receives Call from Canadian PM Mark Carney Regarding G7 Summit Invitation
63. Dassault and Tata Sign Deal to Manufacture Rafale Fuselages in India
64. Starlink Approved to Launch Satellite Internet Services in India
65. Aravindh Chithambaram Wins Stepan Avagyan Memorial Chess Tournament in Armenia
66. Carlsen Wins 7th Norway Chess Title After Caruana Defeats Gukesh in Final Round
67. Gram Panchayats Recognized for Digital Innovation Under New e-Governance Award Category
68. Renowned Marathi Author and Scholar Daji Panshikar Passes Away at 92
69. World Food Safety Day Observed Globally on June 7
70. Historic British-Era Jail Transformed into Unique 'Sohra 1885' Café in Meghalaya
71. Tom Cruise earns Guinness World Record for 16 fiery parachute jumps in his new Mission Impossible film.
72. World Bank report says India's extreme poverty dropped to 5.3% in 2022-23.
73. Carlos Alcaraz wins his second French Open title after beating World No.1 Jannik Sinner in the longest-ever final.

74. Coco Gauff thanks parents after becoming first American woman since 2015 to win French Open.
75. Piyush Chawla retires from all formats of cricket after a 20-year career.
76. Sara Errani and Jasmine Paolini win French Open 2025 Women's Doubles title for Italy.
77. Andhra Pradesh to host India's first AI University in collaboration with NVIDIA.
78. Bihar records steepest drop in sex ratio at birth — from 964 girls per 1000 boys in 2020 to 891 in 2022.
79. Centre introduces new rules for Ladakh, including local job quota, 15-year domicile, women's reservation, and 5 official languages.
80. Tamil Nadu declares Dhanushkodi as Greater Flamingo Sanctuary on World Environment Day.
81. SBI pays ₹8,076.84 crore dividend to the Government for FY25.
82. Former India captain MS Dhoni inducted into ICC Hall of Fame.
83. India secures six gold medals on the final day of Taiwan Open Athletics.
84. India to acquire three indigenous QRSAM regiments worth ₹30,000 crore for Army Air Defence.
85. India's 'Bharat Mandap' Pavilion ranked among top five at World Expo Osaka 2025.
86. DRDO transfers technology of nine systems to ten industries to boost defense manufacturing.
87. Group Captain Shubhanshu Shukla to become India's second astronaut on Axiom-4 space mission on June 11, 2025.
88. Delhi CM Rekha Gupta launches 'Ek Ped Maa Ke Naam 2.0' tree plantation campaign.
89. New 5 km traffic tunnel planned in Delhi between Shiv Murti and Nelson Mandela Road.
90. Delhi to build India's first e-waste recycling park in Holambi Kalan.
91. India's Maternal Mortality Rate drops by 50 points under PM Surakshit Matritva Abhiyan.
92. Covrzy partners with NammaYatri to provide affordable health insurance to gig workers.
93. Jana Small Finance Bank applies for universal banking license from RBI.
94. LIC enters Guinness World Records for highest life insurance policies sold in a single day.
95. Elavenil Valarivan wins bronze for India in 10m air rifle at Munich Shooting World Cup.
96. Nicholas Pooran retires from international cricket to focus on franchise leagues.
97. Sumit Madan to become MD & CEO of Axis Max Life Insurance from October 1, 2025.

98. Sailesh Mehta elected as Chairman of Fertiliser Association of India (FAI).
99. International Day of Play 2025 observed with theme “Choose Play – Every Day”.
100. India launches its first Jungle Safari Train with Vistadome coach between Dudhwa and Katarniaghat.
101. Israeli Navy intercepts UK ship carrying Gaza aid and detains Greta Thunberg.
102. Katrina Kaif appointed Maldives' global tourism ambassador ahead of PM Modi's visit.
103. Meta to invest \$15 billion in Scale AI to pursue superintelligence goals.
104. SEBI mandates '@valid' UPI handles for intermediaries to curb fraud.
105. 17-year-old Arvid Lindblad gets F1 exemption after Red Bull request.
106. Priyanka Goswami wins gold in 10km race at Austrian Racewalking Championships.
107. Indian Army joins multinational military drill 'Khaan Quest 2025' in Mongolia.
108. Shantanu Mitra to step down as CEO & MD of SMFG India Credit by June end.
109. World Day Against Child Labour observed on June 12 to combat child exploitation.
110. Goa's Ozzo Feni becomes the first feni to get GI tag in India.
111. India slipped to 131st place in the Global Gender Gap Index 2025, marking a relative decline in gender parity.
112. Tata Group announced ₹1 crore compensation per victim's family and support for the damaged BJ Medical College hostel.
113. SEBI approved NSE's plan to introduce monthly electricity futures to manage power price volatility.
114. Trump declared a U.S.-China deal with 55% tariffs on Chinese goods and access to rare earths, but details suggest it's just a framework.
115. Sift Kaur Samra won her second medal of the season with a bronze in the 50m rifle 3-position at the Munich World Cup.
116. India and the U.K. held a joint naval exercise in the Arabian Sea, boosting interoperability and maritime security.
117. An Air India flight to London crashed into a medical college complex in Ahmedabad, killing almost all on board, with only one British passenger surviving.
118. Brian Wilson, co-founder of the Beach Boys and music legend, passed away at the age of 82.
119. Former Gujarat CM Vijay Rupani died in the Air India crash near Ahmedabad, which killed over 200 people.

120. GSK and Bharat Biotech have teamed up to develop the altSonflex1-2-3 Shigella vaccine, with Bharat Biotech leading Phase 3 trials and production.
121. Cabinet approves ₹6,405 crore rail projects in Jharkhand, Karnataka, and Andhra Pradesh.
122. Jacinda Ardern's memoir 'A Different Kind of Power' released globally.
123. India participates as Vice President in 2nd IALA Council session in France.
124. Gensol Engineering admitted to insolvency after ₹510 crore default to IREDA.
125. IREDA raises ₹2,005.90 crore via QIP to expand green energy lending.
126. RBI approves STRIPS trading for state government bonds to enhance liquidity.
127. UNFPA: 38% Indian families can't have desired number of children due to financial stress.
128. India's first underwater museum to be built around INS Guldar in Maharashtra.
129. June 13 observed as International Albinism Awareness Day with focus on rights and skin protection.
130. 'Viksit Krishi Sankalp Abhiyan' concludes in Gujarat with farmer conference.
131. Iran halts partial gas output at South Pars after Israeli airstrike triggers fire.
132. New Zealand introduces Parent Boost Visa with a 10-year stay provision for immigrants' parents.
133. Amazon signs 17-year nuclear energy deal with Talen for powering AWS data centers.
134. HBL Engineering secures ₹133 crore contract for Kavach railway safety system.
135. India launches green skills-based EV training program in partnership with Shell.
136. Samay Project Services IPO worth ₹14.69 crore opens for public subscription.
137. Indian forces conduct high-risk operation to rescue fire-hit Singaporean vessel near Kochi.
138. Ganesh Baliga appointed as MD and Head of Citi India Solutions to expand tech base.
139. SBI General Insurance names Mohd. Arif Khan as Deputy CEO to boost leadership strength.
140. Sun Pharma appoints Kirti Ganorkar as new Managing Director from September 1, 2025.
141. Centre notifies two-phase caste census to begin in 2026 in Ladakh and 2027 in rest of India.

142. Meta appoints Arun Srinivas as Managing Director and India Head.
143. NPCI and IDRBT form alliance to enhance cybersecurity in India's digital payments sector.
144. BCCI forms safety committee after stampede during RCB's IPL celebration in Bengaluru.
145. South Africa wins first ICC title in 27 years with WTC 2025 victory over Australia.
146. Yajik Hillang wins Gold for India at South Asian Bodybuilding Championship in Bhutan.
147. Indian Coast Guard's fifth patrol vessel 'Achal' launched by Goa Shipyard Ltd.
148. Lt Commander Yashasvi Solanki becomes first woman naval ADC to the President.
149. PM Modi receives Cyprus's highest civilian award – Grand Cross of the Order of Makarios III.
150. Sri Lanka celebrates Poson Poya festival, marking Buddhism's arrival over 2,000 years ago.
151. Ministry of Panchayati Raj to sign MoU with Bhashini to improve multilingual e-Governance.
152. Aernnova Aerospace signs a \$300 million contract with Mahindra Aerostructures to manufacture aircraft components for Airbus and Embraer.
153. CCI approves Delhivery's acquisition of 99.44% stake in Ecom Express.
154. Fast-food chain Dairy Queen, owned by Warren Buffett, to enter Indian market via Devyani International.
155. Hindustan Zinc to invest ₹12,000 crore to set up a new integrated zinc smelter in Rajasthan.
156. Indian boxer Nishant Dev wins his second professional fight at Madison Square Garden, New York.
157. Smriti Mandhana regains No.1 spot in ICC ODI batting rankings after six years.
158. U Mumba wins their first-ever Ultimate Table Tennis title with an 8-4 victory over Jaipur Patriots.
159. Indian Army contingent departs for 8th India-France joint military exercise SHAKTI in France.
160. Tom Cruise, Dolly Parton, Debbie Allen, and Wynn Thomas to receive honorary Oscars in 2025.
161. IIM Bangalore tops Indian institutes in QS MBA Rankings 2025, ranks 53rd globally.
162. Central government extends gratuity benefits to UPS-option employees from April 2025.
163. Vietnam officially joins BRICS as partner country, expanding group's influence in Southeast Asia.

164. DPIIT signs MoU with YourStory to strengthen inclusive entrepreneurship in India.
165. DEPwD, NIOS, and NCERT sign MoU to promote inclusive education for persons with disabilities.
166. Jio Financial acquires SBI's 17.8% stake, becomes sole owner of Jio Payments Bank.
167. INS Arnala commissioned into Indian Navy on 18 June 2025 at Visakhapatnam.
168. Vodafone appoints Pilar López as next CFO from October 2025, replacing Luka Mucic.
169. Indian animation film 'Desi Oon' wins big at Annecy Festival 2025 in France.
170. June 19 observed as UN's International Day to Eliminate Sexual Violence in Conflict.
171. Department of Telecommunications and IIT Madras launch TTDF Symposium 2025 to boost indigenous telecom innovation.
172. Four Indian universities enter global top 100 in THE Impact Rankings 2025 for their work on UN SDGs.
173. Kanpur to get ₹700 crore EV manufacturing park under Vision 2030 for clean mobility growth.
174. PM Modi congratulates Divya Deshmukh for her historic victory over World No.1 Hou Yifan in blitz chess.
175. ASI to host global seminar in August 2025 on decoding the Indus Valley script.
176. FDA approves injectable lenacapavir as long-acting HIV prevention, welcomed by WHO.
177. U.S. doctors perform country's first fully robotic heart transplant at Houston hospital.
178. India and Ukraine hold first Joint Working Group meeting to enhance agricultural cooperation.
179. ISRO announces Bharatiya Antariksh Hackathon 2025 to promote space innovation among students.
180. UK researchers develop advanced scanner for brain tumour diagnosis using Field Cycling Imaging.
181. India Launches 'Operation Sindhu' to Evacuate Citizens Amid Escalating Israel-Iran Conflict.
182. Neeraj Chopra Wins Gold in Paris Diamond League 2025 with 88.16m Javelin Throw.
183. BSNL Soft Launches India's First Indigenous SIM-less Quantum 5G FWA Service.
184. Pakistan Finalizes \$1 Billion ADB-Backed Syndicated Loan Amid Economic Crisis.
185. IPPB Wins Digital Payments Award 2024–25 for Expanding Financial Inclusion.

186. UPI Services to be Introduced in Cyprus for Enhancing Cross-Border Transactions.
187. Ram Bahadur Rai Honoured with Padma Bhushan for Contributions to Literature and Education.
188. Delhi Gets IMD Approval to Begin Artificial Rain Project for Pollution Control.
189. International Yoga Day 2025 Highlights Yoga's Role in Global Health and Sustainability.
190. Mizoram Signs MoU with BHASHINI to Promote Digital Governance in Mizo Language.
191. Iran Approves Closure of Strait of Hormuz Amid Rising Tensions.
192. India Rises to 15th Spot in Global FDI Ranking for 2024 Despite Minor Dip.
193. SECI to Finalize Tender for Annual 7.24 Lakh Tonnes of Green Ammonia Production.
194. RBI Launches Unified Lending Interface to Boost MSME Credit.
195. Delhi CM Unveils Logo and Mascot 'Viraj' for World Para Athletics Championship 2025.
196. Indian Navy to Commission New Stealth Frigate 'Tamal' in Russia on July 1.
197. Former England Pacer David Lawrence Dies at 61 from Motor Neurone Disease.
198. FedEx Founder Frederick Smith Passes Away at Age 80.
199. Hindustan Copper Welcomes Chile's CODELCO Team for Mining Collaboration.
200. HAL to Manufacture ISRO's SSLV After ₹511 Crore Tech Transfer Deal.
201. Bihar becomes first Indian state to implement mobile-based e-voting system for urban elections.
202. ECoR launches 'ECoR Yatra' app to provide real-time railway services for Rath Yatra pilgrims in Puri.
203. PM Modi chairs 48th PRAGATI meet, calls for faster health infra development in tribal and remote areas.
204. UPSC launches 'Pratibha Setu' to connect qualified but unselected candidates with job opportunities.
205. India and Kenya unveil India-Africa Commemorative Pillar in honour of World War I martyrs in East Africa.
206. CCI approves Manipal Health Systems' acquisition in Aakash Educational Services.
207. India's coffee exports surge by over 25% in early FY25-26, maintaining strong growth momentum.
208. SEBI eases norms for foreign investors in government bonds and simplifies PSU delisting process.

209. Neeraj Chopra wins gold at Ostrava Golden Spike 2025 with a throw of 85.29m.
210. Tripura becomes India's third state after Mizoram and Goa to achieve full functional literacy under ULLAS.
211. ₹1,000 crore Green Data Centre foundation laid in Ghaziabad by UP CM and Union Minister.
212. Govt launches WhatsApp chatbot on MY Bharat portal for youth interaction.
213. ₹3,626 crore sanctioned for Pune Metro Phase-2 to connect key IT suburbs.
214. India launches Sagarmala Finance Corporation—first NBFC for maritime sector.
215. Sugamya Bharat App revamped to enhance accessibility for elderly and disabled.
216. India exports first rose-scented litchi consignment from Pathankot to Qatar.
217. Cabinet approves establishment of International Potato Centre's South Asia hub in Agra.
218. Khelo India University Games 2025 to be hosted in Jaipur this November.
219. ICG inducts 'Adamyra', its first fast patrol vessel with CPP technology.
220. Indian Navy hosts maritime security meeting of IONS in New Delhi.

7. Iran-Israel Conflict and War

Israel launched a full-scale military strike on Iran named “**Operation Rising Lion**” targeting missile and nuclear infrastructure. This strike has taken place after IAEA declared Iran in violation of its nuclear safeguard agreement.

Iran Israel Conflict

The historical background of the Israel Iran conflict can be traced back to the Islamic Revolution that took place in Iran 1979. This revolution adopted an anti-Israel, theocratic posture. Iran has been exerting pressure on Israel with the help of allies, like Hezbollah, Hamas, Houthis and Iraqi militias, avoiding a direct war with Israel. Israel has a history of striking nuclear sites in Iraq and Syria, but Iran poses a tougher and more sensitive challenge. Its growing threat has also pushed many Sunni Arab countries to improve ties with Israel through the Abraham Accords, putting the Palestine issue on the back burner.

Iran-Israel Current War Escalation

According to the IAEA Resolution, Iran can be declared non-compliant with the 1974 safeguards Agreement. This was due to the enriched uranium that was found at undeclared sites. There are various trigger factors that have led to the present escalations in between Iran and Israel:

- **Nuclear Talks Break Down:** The breakdown of US-Iran negotiations, led Israel to view this as Tehran exploiting diplomatic gaps.
- **Direct Action:** Considering indirect attacks to be ineffective, Israel opted for striking Iranian targets directly instead of going with proxies.
- **Israel Internal Politics:** PM Netanyahu, misused the security tensions to delay elections and consolidate power.

IAEA’s Latest Assessment on Iran’s Nuclear Activities

- **Evidence of Non-Compliance:** The IAEA has detected unexplained traces of uranium and continued lack of transparency at key Iranian sites—Lavan-Shian, Varamin, and Turqzabad.
- **Significant Legal Breach:** This marks the seventh recorded violation under Article XII.C of the IAEA Statute, potentially triggering further scrutiny and referral to the UN Security Council.
- **Implications for Sanctions:** European parties to the JCPOA may consider activating the snapback mechanism, reinstating previous UN sanctions against Iran.

- **Iran’s Rebuttal and Escalation:** In response, Iran has rejected the IAEA’s conclusions, threatened withdrawal from the Non-Proliferation Treaty (NPT), and initiated new underground uranium enrichment projects.
- **Critical Upcoming Report:** The next IAEA report, expected in August, will be pivotal. Continued non-cooperation by Iran could significantly heighten diplomatic strain and escalate regional security concerns.

U.S. Joins Israel-Iran Conflict Direct Strikes on Iranian Nuclear Facilities

The United States has formally entered the Israel-Iran conflict with precision airstrikes targeting three of Iran’s key nuclear sites—Fordow, Natanz, and Isfahan. Conducted using B-2 stealth bombers equipped with bunker-busting bombs, the attack included a successful hit on the heavily fortified Fordow Uranium Enrichment Plant, a facility previously beyond Israel’s operational reach.

Key Developments include:

- **Strategic Escalation:** This marks the first direct U.S. military action in the ongoing conflict, signaling a significant shift from prior support roles to active engagement.
- **Strengthening the U.S.-Israel Alliance:** The strikes underscore an “iron-clad” U.S. commitment to Israel’s security, reinforcing its stance that Iran’s nuclear program poses an existential threat.
- **Policy Reversal:** The operation reflects a departure from former President Trump’s stated doctrine of avoiding foreign military entanglements, contradicting his past promises of restraint and swift conflict resolution.
- **Operational Impact:** The U.S. successfully targeted deeply buried nuclear infrastructure, providing Israel with a tactical edge it previously lacked, and advancing its long-standing goal of curbing Iran’s nuclear ambitions.

Broader Implications of the Iran-Israel War

Following are the global as well as regional implications of the Iran-Israel War:

Iran-Israel War Global Ramifications

- **Energy Market Volatility:** Rising tensions in the Strait of Hormuz—through which approximately 20% of the world’s oil supply transits—pose a serious threat of global oil price escalation and market instability.
- **Strategic Dilemma for the United States:** Washington faces the challenge of supporting Israel while avoiding direct military entanglement and safeguarding its regional bases and assets.

- **Nuclear Proliferation Risks:** Iran's possible withdrawal from the Nuclear Non-Proliferation Treaty (NPT) could trigger a regional arms race, undermining global non-proliferation norms.

Iran-Israel War Regional Dynamics

- **Escalation Across the Middle East:** Conflict spillovers may intensify drone warfare and proxy engagements in countries such as Iraq, Syria, and Lebanon, destabilizing an already fragile region.
- **Setbacks to Diplomacy:** Ongoing diplomatic initiatives—including the revival of the US-Iran nuclear deal and efforts toward a two-state solution—risk collapse amidst heightened hostilities.
- **Militant Mobilisation:** Iran-aligned groups such as the Popular Mobilization Forces (PMF) and the Houthis could escalate strikes on Israeli and American targets, increasing the threat of a wider regional war.

Iran-Israel War Implications for India

Diaspora Vulnerability: With nearly 8 million Indian nationals residing in West Asia, their safety becomes a critical concern, especially if evacuation becomes necessary.

Energy Security Risks: Over 60% of India's crude oil imports transit through the Strait of Hormuz; any disruption may lead to significant supply shocks and inflationary pressure.

Diplomatic Balancing Act: India must tread carefully, preserving its strategic partnerships with both Israel and Iran, while navigating a complex landscape of rising sanctions and geopolitical alignments

8. 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.

1. General Knowledge	2. Law
<ol style="list-style-type: none">1. Current Affairs2. G.K.MCQs3. History of India and Indian Culture4. Geography of India5. Indian Polity6. Current National Issues7. Topic of Social Relevance with special reference to newly added 9 Social Acts8. India and the World9. Indian Economy10. International Affairs and Institutions11. Development in the field of: (i) Science and Technology (ii) Communications and Space	<ol style="list-style-type: none">1. Constitutional Law2. Law of Evidence3. Criminal Procedure Code4. Code of Civil Procedure,5. Indian Panel Code6. Law of Contract7. Partnership Act8. Easements Act9. Law of Torts10. Transfer of Property Act11. Principles of Equity ,12. Law of Trust13. Specific Relief Act14. Hindu Law15. Muslim Law16. U.P. Revenue Code.17. U.P. Municipalities Act 191618. U.P. Panchayat Raj Act 194719. U.P. Consolidation of Holdings Act, 195320. U.P. Urban (Planning and Development) Act, 1973
3. CLAT <ol style="list-style-type: none">1. General Knowledge2. A Guide for CLAT	

* * * * *