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Anti-Conversion Legislation in India: A Comparative Analysis of State-Level Legal Frameworks

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ABSTRACT

Anti-conversion legislation in India represents a significant area of constitutional and legislative debate concerning religious freedom, individual autonomy, public order and the regulatory authority of the State. Several Indian states have enacted laws to prohibit religious conversion allegedly obtained through force, fraud, coercion, undue influence or unlawful inducement. However, differences in statutory definitions, procedural requirements, penalties and enforcement mechanisms have created a diverse legal landscape requiring systematic comparative examination. This study aims to analyse the anti-conversion legal frameworks of selected Indian states, with particular emphasis on Uttar Pradesh, Madhya Pradesh, Gujarat, Uttarakhand and Odisha. It examines the constitutional foundations of these laws, especially Articles 14, 21 and 25 of the Constitution of India, and evaluates their compatibility with equality, personal liberty and freedom of conscience. Adopting a doctrinal and comparative research methodology, the study relies on constitutional provisions, state legislation, judicial precedents, government documents and relevant scholarly literature. The analysis focuses on variations in the definition of unlawful conversion, prior declaration and notification requirements, complaint mechanisms, burden of proof, criminal penalties and procedural safeguards. It also considers the judicial interpretation of conversion-related disputes, particularly those involving interfaith marriages and the voluntary exercise of religious choice. The study seeks to identify similarities, differences and potential inconsistencies among state-level legal frameworks while assessing their implications for constitutional governance and individual rights. It argues that effective regulation should distinguish genuine instances of coercive conversion from voluntary changes of religious belief. The research aims to contribute to informed legislative reform by highlighting the importance of precise statutory language, proportionate restrictions, fair procedures and effective judicial oversight in maintaining a constitutionally balanced approach to religious conversion in India.

Keywords: Anti-Conversion Legislation, Religious Freedom, Constitutional Law, Comparative Legal Analysis, Individual Autonomy

INTRODUCTION

Anti-conversion legislation in India represents an important area of constitutional, legislative and socio-legal debate concerning religious freedom, individual autonomy and the regulatory authority of the State. Religious conversion involves a person's freedom to adopt, change or renounce religious beliefs according to individual conscience. However, concerns arise when conversion is alleged to have been obtained through force, fraud, coercion, undue influence or unlawful inducement. The principal legislative challenge is to prevent such unlawful practices without unnecessarily restricting the voluntary exercise of religious freedom. Article 25 of the Constitution of India guarantees freedom of conscience and the right freely to profess, practise and propagate religion, subject to public order, morality, health and the other provisions of Part III.[1] Articles 14 and 21 further guarantee equality before the law and protection of life and personal liberty.[2] These constitutional provisions establish the framework within which state anti-conversion laws must be assessed.

India does not have a single, comprehensive central statute governing religious conversion across the country. Instead, several states have enacted their own freedom of religion or unlawful conversion laws, resulting in differences in

[1] INDIA CONST. art. 25, available at India Code, Article 25: Freedom of Conscience and Religion (last accessed on 15 September 2026).
[2] INDIA CONST. arts. 14 and 21, available at Supreme Court of India — Constitution (last accessed on 16 September 2026).

statutory definitions, procedural obligations, criminal penalties and enforcement mechanisms. Odisha enacted the Orissa Freedom of Religion Act, 1967, followed by the Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968.[3] Other states, including Arunachal Pradesh, Chhattisgarh, Gujarat, Himachal Pradesh, Jharkhand, Uttarakhand and Uttar Pradesh, have also adopted legislation regulating religious conversion, although their statutory provisions and implementation arrangements differ. This state-level diversity provides an important basis for comparative legal research. Examining these laws together helps identify common legislative objectives, differences in regulatory approaches and potential inconsistencies in their relationship with constitutional guarantees.

The constitutional debate surrounding these enactments was significantly shaped by the Supreme Court's decision in Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677.[4] The Court upheld the relevant Madhya Pradesh and Orissa legislation and distinguished the right to propagate religious beliefs from an unrestricted right to convert another person. The judgment remains a foundational precedent for understanding the constitutional limits of religious propagation and the State's authority to regulate conversion obtained through prohibited means. Nevertheless, the interpretation of individual autonomy has also developed through subsequent constitutional jurisprudence. In K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1, the Supreme Court recognised privacy as a fundamental right, while Shafin Jahan v. Asokan K.M., (2018) 16 SCC 368, emphasised autonomy in matters of faith, marriage and personal choice.[5] Although neither judgment directly invalidated anti-conversion legislation, both provide relevant constitutional principles for evaluating restrictions that may affect an individual's religious identity and personal decisions.

Evolution and Diversity of State-Level Anti-Conversion Laws

The evolution of anti-conversion legislation demonstrates how different states have approached the regulation of religious conversion according to their legislative priorities and administrative frameworks. The Orissa Freedom of Religion Act, 1967, and the Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, represent early legislative efforts in this area.[6] Subsequent enactments introduced variations in the definition of unlawful conversion, the treatment of allurement and inducement, procedural declarations, complaint requirements and penalties. A comparative assessment by the Legislative Department and research organisations such as PRS Legislative Research illustrates the differences among state laws, particularly concerning prior permission, public notice, conversion through marriage and enhanced punishments for offences involving vulnerable persons.[7] These differences make a state-wise examination necessary to understand the practical scope of conversion regulation.

For instance, the Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021, and the Madhya Pradesh Freedom of Religion Act, 2021, contain provisions addressing conversion through prohibited means and prescribing criminal consequences. Gujarat's legislation includes administrative requirements relating to conversion, while Uttarakhand's framework contains provisions concerning marriages allegedly undertaken for the purpose of unlawful conversion.[8] Such provisions raise questions about the relationship between administrative supervision and individual freedom. The comparison must therefore consider not only the stated objective of preventing coercion but also the legal consequences of non-compliance, the authority empowered to initiate proceedings and the safeguards available to the persons concerned.

The constitutional dimension becomes particularly important when procedural obligations affect privacy, religious identity and the ability of adults to make independent decisions. A comparative study should examine whether notice and declaration requirements are proportionate to the legitimate objective of preventing unlawful conversion, whether the statutory definitions provide sufficient legal certainty and whether the burden of proof is consistent with principles of criminal justice. It should also distinguish between enacted legislation, amendments, proposed bills and provisions

[3] The Orissa Freedom of Religion Act, 1967; The Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, discussed in Congressional Research Service, State Anti-Conversion Laws in India (last accessed on 17 September 2026).
[4] Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677, available at Indian Kanoon (last accessed on 18 September 2026).
[5] K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1; Shafin Jahan v. Asokan K.M., (2018) 16 SCC 368, available at Indian Kanoon — Puttaswamy and Indian Kanoon — Shafin Jahan (last accessed on 19 September 2026).
[6] The Orissa Freedom of Religion Act, 1967; The Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, discussed in PRS Legislative Research, Anti-Conversion Legislation: Comparison of the UP Ordinances with Other State Laws (last accessed on 15 September 2026).
[7] PRS Legislative Research, Inter-State Comparison of Religious Conversion Laws (last accessed on 16 September 2026).
[8] The Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021; The Madhya Pradesh Freedom of Religion Act, 2021; The Gujarat Freedom of Religion Act, 2003; The Uttarakhand Freedom of Religion Act, 2018, discussed in Congressional Research Service, State Anti-Conversion Laws in India and PRS Legislative Research (last accessed on 17 September 2026).

whose implementation or judicial status may have changed. This distinction is essential for ensuring that comparative conclusions are based on the law applicable in each state during the period under examination.

Significance, Scope and Objectives of the Comparative Study

The present study seeks to examine selected state-level anti-conversion laws through a doctrinal and comparative legal methodology. It analyses constitutional provisions, legislative enactments, judicial precedents and relevant legal scholarship to identify similarities, differences and unresolved questions. Particular emphasis is placed on statutory definitions, conversion procedures, marriage-related provisions, criminal penalties, complaint mechanisms and evidentiary requirements. The study also evaluates how courts reconcile the prevention of coercive conversion with the constitutional protection of voluntary religious choice. The significance of this research lies in its capacity to identify areas where statutory ambiguity, procedural complexity or inconsistent implementation may create difficulties for individuals and enforcement authorities. Ultimately, the comparative analysis aims to contribute to a clearer understanding of the relationship between state legislative authority, constitutional rights and religious freedom. It also seeks to identify possible reforms that preserve the legitimate objective of preventing coercion while ensuring equality before the law, personal liberty, due process and respect for freedom of conscience.

Research methodology

The present study adopts a doctrinal and comparative legal research methodology to examine anti-conversion legislation across selected Indian states. The research is primarily based on secondary sources, including the Constitution of India, state-specific anti-conversion statutes, legislative amendments, judicial precedents of the Supreme Court and High Courts, government reports, law commission publications, legal journals and scholarly books. The study focuses on the legal frameworks of Uttar Pradesh, Madhya Pradesh, Gujarat, Uttarakhand and Odisha. A comparative analytical approach is employed to evaluate differences in statutory definitions, declaration and notification requirements, complaint procedures, criminal penalties, burden of proof and procedural safeguards. Particular attention is given to Articles 14, 21 and 25 of the Constitution of India and their interpretation in relevant judicial decisions. The research also assesses the implications of these legislative variations for religious freedom, individual autonomy, equality and due process. The study is qualitative and aims to identify legislative inconsistencies and suggest constitutionally appropriate reforms.

Analysis

1. Comparative Legal Analysis of State-Level Anti-Conversion Frameworks

The comparative analysis of anti-conversion legislation in India requires an examination of the relationship between legislative objectives, constitutional guarantees and judicial interpretation. The first objective of the study is to compare the legal frameworks of selected states, particularly Uttar Pradesh, Madhya Pradesh, Gujarat, Uttarakhand and Odisha. The second objective is to evaluate their implications for religious freedom, individual autonomy, equality and procedural fairness. A doctrinal methodology enables this comparison through constitutional provisions, statutory texts and judicial precedents, rather than relying on unverified assumptions about the implementation of these laws.

The constitutional foundation is Article 25 of the Constitution of India, which protects freedom of conscience and the right to profess, practise and propagate religion, subject to constitutionally prescribed limitations. Articles 14 and 21 additionally protect equality and life and personal liberty.[9] In Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677, the Supreme Court upheld the relevant anti-conversion legislation of Madhya Pradesh and Odisha, holding that the right to propagate religion does not include an unrestricted fundamental right to convert another person.[10] This judgment remains central to the constitutional analysis of state conversion laws. However, it should not be interpreted as authorising restrictions on every voluntary conversion. The legal distinction between conversion through unlawful means and the independent exercise of religious conscience remains essential.

State legislation differs in its terminology, procedural requirements, offences and penalties. The Orissa Freedom of Religion Act, 1967, and the Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, represent early examples of state regulation. Later enactments in Uttar Pradesh, Gujarat and Uttarakhand introduced their own regulatory arrangements, including provisions concerning declarations, administrative authorities and conversion associated with marriage.[11] These differences require a provision-by-provision comparison. A statute's stated purpose alone cannot establish whether every restriction is constitutionally justified; its wording, scope, operation and safeguards must also be examined.

[9] INDIA CONST. arts. 14, 21 and 25, available at Constitution of India (accessed on 9 October 2026).
[10] Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677, available at Indian Kanoon (accessed on 9 October 2026).
[11] PRS Legislative Research, "Anti-Conversion Legislation: Comparison of the UP Ordinances with Other State Laws," available at PRS Legislative Research (accessed on 9 October 2026).

2. Comparative assessment of statutory provisions

The comparative framework is summarised in Table 1. The table identifies important differences in the legislative design of selected states and highlights the need to examine both substantive prohibitions and procedural safeguards.

Table 1: Comparative Features of Selected State Anti-Conversion Laws

State	Principal Legislation	Important Areas of Regulation
Odisha	Orissa Freedom of Religion Act, 1967	Prohibition of conversion through force, fraud and inducement
Madhya Pradesh	Madhya Pradesh Freedom of Religion Act, 2021	Prohibited conversion, declarations, penalties and complaint procedures
Uttar Pradesh	Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021	Unlawful conversion, marriage-related provisions, declarations and criminal liability
Gujarat	Gujarat Freedom of Religion Act, 2003, as amended	Conversion procedures, prohibited means and statutory permissions
Uttarakhand	Uttarakhand Freedom of Religion Act, 2018, as amended	Unlawful conversion, procedural requirements and penalties

Source: Prepared by the researcher on the basis of the relevant state enactments and PRS Legislative Research's comparative analysis of state conversion laws. The table is indicative and does not reproduce every amendment or procedural requirement.

A significant difference concerns the procedures required before and after conversion. The comparative review by PRS Legislative Research identifies advance declarations, notification to district authorities and police inquiries among the requirements introduced under the Uttar Pradesh and Madhya Pradesh frameworks. It also identifies differences in complaint eligibility, the treatment of reconversion and the allocation of the burden of proof.[12] These requirements may facilitate investigation of allegations of coercion, but they also raise questions concerning privacy, administrative discretion and the potential exposure of an individual's religious choices.

The constitutional assessment should therefore consider whether procedural obligations are clearly defined, necessary for a legitimate purpose and proportionate to the conduct being regulated. Prior notification is not identical to a requirement for prior permission, and the two should not be treated as interchangeable. Similarly, statutory provisions concerning conversion associated with marriage must be analysed according to their precise wording and the applicable judicial interpretation. A comparative study must also distinguish enacted and operative provisions from proposed amendments and provisions whose constitutional validity is under challenge.

3. Comparative analysis of landmark judicial decisions

Judicial precedents are central to determining how anti-conversion legislation should be interpreted and applied. Table 2 identifies 17 decisions relevant to the constitutional and procedural questions raised by state conversion laws. The cases are classified according to whether they directly address conversion legislation or provide broader principles relevant to religious freedom, personal autonomy and criminal procedure.

Table 2: Landmark Judicial Decisions Relevant to Anti-Conversion Legislation in India

No.	Case and Citation	Principal Relevance
1	Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677	Direct constitutional challenge to anti-conversion legislation
2	Ratilal Panachand Gandhi v. State of Bombay, AIR 1954 SC 388	Freedom of religious belief and practice
3	Bijoe Emmanuel v. State of Kerala, (1986) 3 SCC 615	Protection of sincere religious conscience
4	S.R. Bommai v. Union of India, (1994) 3 SCC 1	Constitutional secularism
5	Sarla Mudgal v. Union of India, (1995) 3 SCC 635	Conversion and matrimonial obligations
6	Lily Thomas v. Union of India, (2000) 6 SCC 224	Conversion and the law of bigamy
7	T.T. Antony v. State of Kerala, (2001) 6 SCC 181	Limits on successive FIRs
8	Lata Singh v. State of Uttar Pradesh, (2006) 5	Autonomy in marriage and protection against

[12] PRS Legislative Research, "Anti-Conversion Legislation: Comparison of the UP Ordinances with Other State Laws," available at PRS Legislative Research (accessed on 9 October 2026).

	SCC 475	harassment
9	Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273	Safeguards against unnecessary arrest
10	Shafin Jahan v. Asokan K.M., (2018) 16 SCC 368	Adult autonomy in matters of faith and marriage
11	Nandakumar v. State of Kerala, (2018) 16 SCC 602	Personal autonomy and adult relationships
12	K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1	Privacy and decisional autonomy
13	Common Cause v. Union of India, (2018) 5 SCC 1	Personal autonomy and dignity
14	Priyanshi @ Km Shamreen v. State of U.P., Writ-C No. 14288 of 2020	Conversion and marriage; approach of the Allahabad High Court
15	Noor Jahan Begum @ Anjali Mishra v. State of U.P., Writ-C No. 57068 of 2014	Conversion and the assessment of religious belief
16	Raquib Imam Ansari v. State of U.P., decided 11 February 2025	Application of provisions of the Uttar Pradesh conversion statute
17	Rajendra Bihari Lal v. State of Uttar Pradesh, 2025 INSC 1249	Statutory complaint requirements and proceedings under the Uttar Pradesh Act

Source: Prepared by the researcher from reported Supreme Court and High Court decisions and case-law databases. Decisions concerning privacy, marriage and criminal procedure are included as relevant constitutional or procedural authorities, not as direct rulings on the validity of every anti-conversion statute.

The table demonstrates that the relevant judicial framework extends beyond decisions directly challenging conversion statutes. Stainislaus addresses the constitutional foundation of such legislation, whereas Puttaswamy and Shafin Jahan supply principles relevant to privacy and individual autonomy. The distinction is important: a decision recognising a general fundamental right does not, without further analysis, invalidate a specific statutory provision. Courts must examine the particular restriction, the legislative objective and the circumstances of the case.

The Supreme Court's decision in Rajendra Bihari Lal v. State of Uttar Pradesh, 2025 INSC 1249, is particularly relevant to statutory enforcement. The judgment examined proceedings arising under the Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021, including the legal requirements governing complaints. It illustrates that even where legislation pursues a legitimate objective, criminal proceedings must comply with the statute's express procedural conditions.[13] The decision should not be interpreted as a blanket declaration invalidating every provision of the Uttar Pradesh Act.

Similarly, Priyanshi and Noor Jahan Begum illustrate the difficulties faced by courts when assessing religious conversion associated with marriage. These decisions require careful reading in light of their factual circumstances and subsequent Supreme Court jurisprudence. The mere occurrence of conversion before marriage does not, by itself, establish that force or fraud has occurred. Conversely, allegations of coercion must be examined on the available evidence rather than dismissed solely because an adult has entered a relationship voluntarily.

4. Constitutional assessment and implications for legislative reform

The comparative findings reveal three principal issues. First, differences in statutory language may create uncertainty about the boundary between prohibited inducement and lawful religious persuasion. Second, procedural requirements may affect the privacy and autonomy of individuals seeking to change their religion. Third, variations in complaint eligibility, evidentiary burdens and criminal penalties may produce different legal consequences for comparable conduct across states. The research must therefore evaluate whether each restriction is sufficiently precise and proportionate, rather than assuming that every state-level provision has identical constitutional implications.

The Supreme Court's decisions in S.R. Bommai v. Union of India, (1994) 3 SCC 1, and Bijoe Emmanuel v. State of Kerala, (1986) 3 SCC 615, offer broader constitutional principles concerning secularism and freedom of conscience.[14] Meanwhile, Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273, reinforces the importance of safeguards against unnecessary arrest.[15] These principles are relevant to ensuring that conversion-related investigations remain consistent with constitutional governance and fair criminal procedure.

[13] Rajendra Bihari Lal v. State of Uttar Pradesh, 2025 INSC 1249, available through Indian Kanoon (accessed on 9 October 2026).
[14] S.R. Bommai v. Union of India, (1994) 3 SCC 1; Bijoe Emmanuel v. State of Kerala, (1986) 3 SCC 615, available through Indian Kanoon — S.R. Bommai and Indian Kanoon — Bijoe Emmanuel (accessed on 9 October 2026).
[15] Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273, available through Indian Kanoon (accessed on 9 October 2026).

Legislative reform should prioritise clear definitions, transparent procedures, impartial investigation and effective judicial oversight. Statutory requirements should distinguish voluntary conversion from conduct established to involve coercion, fraud or other prohibited means. Courts should assess allegations on evidence and apply procedural safeguards consistently. Comparative analysis should also examine whether particular restrictions are supported by a legitimate purpose and whether less intrusive measures could achieve that purpose. These recommendations do not presume that all state laws are unconstitutional; rather, they identify questions requiring state-specific legal and judicial evaluation.

CONCLUSION

The comparative study demonstrates that anti-conversion legislation in India comprises diverse state-level frameworks operating within a common constitutional structure. Rev. Stainislaus provides the principal precedent concerning the regulation of unlawful conversion, while subsequent judgments contribute principles of privacy, personal autonomy, equality and due process. The analysis confirms that meaningful comparison must extend beyond statutory titles to examine definitions, declaration requirements, complaint procedures, penalties and judicial interpretation. A balanced legal framework should prevent coercive conversion while respecting voluntary religious choice. Clear legislation, proportionate safeguards and consistent judicial review are therefore essential to reconciling state regulatory objectives with the constitutional protection of freedom of conscience.

Suggestions

Reforming anti-conversion legislation requires evidence-based policymaking, administrative accountability, consistent judicial interpretation and effective protection of constitutional rights across states.

1. **Independent Monitoring:** Establish independent review mechanisms to examine complaints, enforcement practices and potential procedural irregularities.
2. **Protection of Complainants:** Introduce safeguards against malicious complaints while ensuring genuine allegations of coercion receive appropriate investigation.
3. **Privacy Protection:** Restrict unnecessary disclosure of personal religious information and protect confidential conversion-related records.
4. **Legal Awareness:** Conduct awareness programmes explaining religious freedom, lawful conversion procedures and available legal remedies.
5. **Periodic Legislative Review:** Evaluate state laws periodically using judicial developments, implementation evidence and constitutional proportionality standards.

Future scope

Future research may undertake empirical studies on the implementation of anti-conversion laws across Indian states, examine recent judicial developments, compare international religious freedom frameworks, assess impacts on minority communities, and evaluate procedural safeguards. Further investigation may also explore legislative harmonisation, privacy concerns, gender justice and constitutionally proportionate regulatory approaches.

FOOTNOTES

1. INDIA CONST. art. 25, available at India Code, Article 25: Freedom of Conscience and Religion (last accessed on 15 September 2026).
2. INDIA CONST. arts. 14 and 21, available at Supreme Court of India — Constitution (last accessed on 16 September 2026).
3. The Orissa Freedom of Religion Act, 1967; The Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, discussed in Congressional Research Service, State Anti-Conversion Laws in India (last accessed on 17 September 2026).
4. Rev. Stainislaus v. State of Madhya Pradesh, (1977) 1 SCC 677, available at Indian Kanoon (last accessed on 18 September 2026).
5. K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1; Shafin Jahan v. Asokan K.M., (2018) 16 SCC 368, available at Indian Kanoon — Puttaswamy and Indian Kanoon — Shafin Jahan (last accessed on 19 September 2026).
6. The Orissa Freedom of Religion Act, 1967; The Madhya Pradesh Dharma Swatantraya Adhiniyam, 1968, discussed in PRS Legislative Research, Anti-Conversion Legislation: Comparison of the UP Ordinances with Other State Laws (last accessed on 15 September 2026).
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8. The Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021; The Madhya Pradesh Freedom of Religion Act, 2021; The Gujarat Freedom of Religion Act, 2003; The Uttarakhand Freedom of Religion Act, 2018, discussed in Congressional Research Service, State Anti-Conversion Laws in India and PRS Legislative Research (last accessed on 17 September 2026).
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12. PRS Legislative Research, "Anti-Conversion Legislation: Comparison of the UP Ordinances with Other State Laws," available at PRS Legislative Research (accessed on 9 October 2026).
13. Rajendra Bihari Lal v. State of Uttar Pradesh, 2025 INSC 1249, available through Indian Kanoon (accessed on 9 October 2026).
14. S.R. Bommai v. Union of India, (1994) 3 SCC 1; Bijoe Emmanuel v. State of Kerala, (1986) 3 SCC 615, available through Indian Kanoon — S.R. Bommai and Indian Kanoon — Bijoe Emmanuel (accessed on 9 October 2026).
15. Arnesh Kumar v. State of Bihar, (2014) 8 SCC 273, available through Indian Kanoon (accessed on 9 October 2026).