

PRO BONO CLUB

SYMBIOSIS LAW SCHOOL, NOIDA

NEWSLETTER



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JULY & AUGUST 2024



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Under the Nyaya Bandhu Programme, Department of Justice, Ministry of Law & Justice, Government of India



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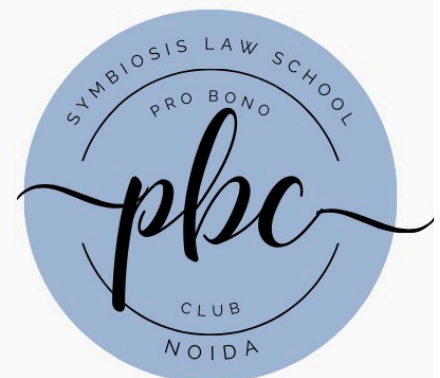


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PRO BONO CLUB ACTIVITIES

JULY- AUGUST 2024

Pro Bono Club - The Selection Process

The Pro Bono Club at Symbiosis Law School, Noida has been serving to cultivate the legal prowess in young minds since its inception in 2020. The Club foresaw its formal inauguration under the aegis of the Department of Justice, Ministry of Law & Justice, Government of India in 2022 and thus, invited applications for the positions of the Pro Bono Associates from learners of BA.LLB. and BBA.LLB. programmes, for selection for the Academic Year 2024-25. The selection procedure opted by the PBC is segregated into three stages. The first round required the interested candidates to fill out an application form, supported by a Statement of Purpose and candidate's Curriculum Vitae (CV), by July 30, 2024. After a review of the 284 received applications, the PBC shortlisted 80 candidates for the Second Round. This Round required the candidates to prepare a pamphlet, elucidating a government legislation enacted for the aid of any vulnerable section of the society, in a simpler and more accessible way. The pamphlet prepared by each candidate could be either in English or Hindi and the illustration could be in handmade form, printed form or digitally made, provided that the digital ones are displayed on a laptop/tablet/iPad during the interaction.

The final round involved a personal interaction of the candidates with an interview panel scheduled from August 8 to 14, 2024. In this round, the candidates were qualitatively judged based on interaction during interview, answers to questions during interview, general demeanour and approach to Pro Bono Club's activities, language proficiency (English and Hindi), prepared pamphlet (judged on readability, accuracy, creativity, language correctness, and appropriateness of content), and expectation of dedicated time from the candidate. The selection process was highly competitive, and the interactions informed of the candidates' abilities to demonstrate socio-legal issues to raise awareness amongst the marginalized communities of the country. Thus, after careful scrutiny and review, 22 candidates were selected as Pro Bono Associates for the Academic Year 2024-25 and the results were announced via Academic Support.

First Meeting of the Pro Bono Club (2024-25)

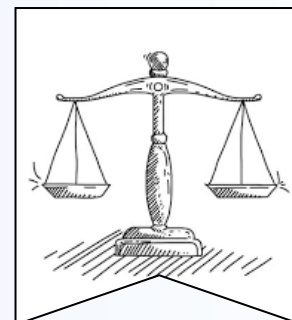
August 27, 2024

An orientation meeting being the first meeting of the newly selected Pro Bono Associates was called by the PBC Faculty Advisor, on campus on August 27, 2024. Owing to the difference in the class schedules of the students, the first- and second-year learners were called at a different time from the third- and fourth-year learners. The agenda of the meetings was to introduce to the learners the procedural background of the functioning of PBC and how their role as Pro Bono Associates can benefit the vulnerable sections of the society through PBC activities. The activities to be undertaken for the current academic year were discussed and the Associates deliberated on diverse ideas, which could be formulated as proposals for the events being conducted at PBC. The themes of the newsletter to be published bi-monthly by the Pro Bono Club were discussed and individual contribution of each member to different sections of the newsletter was decided, thus ensuring a coherent work ethic in the Club. The meeting was concluded with a division of the tasks amongst the Pro Bono Associates who were enthusiastic in taking up new work to fulfill objectives of the Club.

LEGAL NEWS

INDIA'S CRIMINAL JUSTICE REVOLUTION: NEW CRIMINAL LAW BILLS COME INTO FORCE

Harsh Deep Garg



Starting July 1, 2024, India has embarked on a transformative journey with the enactment of its new criminal laws. The भारतीय न्याय संहिता (BNS), भारतीय नागरिक सुरक्षा संहिता (BNSS), and भारतीय साक्ष्य अधिनियम (BSA) are set to replace the colonial-era Indian Penal Code (IPC), Code of Criminal Procedure (CrPC), and Indian Evidence Act (IEA). Approved by Honourable President Droupadi Murmu on December 25, 2023, this legislative overhaul promises to modernize India's criminal justice system and address issues with greater efficiency and fairness. In August 2023, the Government of India moved three bills related to criminal law. Thereafter, based on the recommendations of the Parliamentary Committee, certain changes were introduced in the text of the bills. The bills were passed by both houses of the Parliament in the 2023 Winter Session of Parliament.

The new laws promise to pave the way for reforming out-of-date criminal legislations and correct certain inadequacies in the justice delivery system. According to the government, this will help deal more effectively with new crimes such as terrorism and cybercrimes. It is said that the changes will hasten legal processes, contribute toward reducing delays in courts, and make the justice delivery system work better for all.

The new BNSS provides for zero FIR, i.e., first information report registered at any police station irrespective of the jurisdiction. However, it is also said that according to the new BNSS, the registration of FIRs pertaining to the criminal offenses punishable with imprisonment for a term which may extend to 3 to 7 years has been made optional. An introduction of preliminary inquiry by police before registration of FIR pertaining to such offences may lead to such a conclusion. The introduction of audio-visual recording of searches, and recognition of electronic communication for FIRs etc. are seen as making the criminal justice system more accessible and transparent. Though some doubts have emerged for handcuffing of arrested persons under Section 43(3), however, it is seen that the law also incorporates Supreme Court guidelines on handcuffing. Section 187 introduces changes as to custody of alleged offenders and police remand can now be sought within the first forty and sixty days of the arrest depending on the alleged offence.

With the new criminal laws recently implemented, a massive transformation has been brought into the legal system of India—the Bharatiya Nyaya Sanhita (BNS), Bharatiya Nagarik Suraksha Sanhita (BNSS), and Bharatiya Sakshya Adhinyam (BSA). At the latest, the hon'ble Supreme Court dismissed the case moved against the said laws saying the filing was casual. These laws have commenced with effect from 1st July 2024, and their influence in the legal system will now be watched. The goal of these reforms is criminal justice modernization and the resolution of current legal problems.

Sources:

- 1.NDTV, New Criminal Laws: 1st Case Under New Penal Code Filed Against Delhi's Street Vendor, <https://www.ndtv.com/india-news/new-criminal-laws-1st-case-under-new-penal-code-filed-against-delhis-street-vendor-6006809> (last updated July 1, 2024).
- 2.Times of India, Three New Criminal Laws Coming into Force Across India on July 1: What It Means, <https://timesofindia.indiatimes.com/india/three-new-criminal-laws-coming-into-force-across-india-on-july-1-what-it-means/articleshow/111385520.cms> (last updated June 30, 2024).
- 3.R. V. Pandit, As New Criminal Laws Come into Effect, Here's What Experts Think of Their Impact on Legal System, The Economic Times (July 1, 2024), <https://economictimes.indiatimes.com/news/india/as-new-criminal-laws-come-into-effect-heres-what-experts-think-of-their-impact-on-legal-system/articleshow/111391882.cms?from=mdr>.
- 4.Jurists Have Pointed to Disastrous Consequences of New Criminal Justice Laws, Says Congress, The Hindu (July 29, 2024), <https://www.thehindu.com/news/national/jurists-have-pointed-to-disastrous-consequences-of-new-criminal-justice-laws-says-congress/article67674905.ece>.
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- 6.Economic Times, SC Refuses to Entertain Plea Against New Criminal Laws, Allows Withdrawal of Petition (May 20, 2024), <https://economictimes.indiatimes.com/news/india/sc-refuses-to-entertain-plea-against-new-criminal-laws-allows-withdrawal-of-petition/articleshow/110266408.cms?from=mdr>.

SUPREME COURT ENSURES MINORS ARE NOT REPEATEDLY CALLED TO TESTIFY IN POCSO CASES

Anmol Kothari



In the recent ruling Supreme Court dismissed plea of accused in *Madhab Chandra Pradhan v. State of Odisha*[1] under the Protection of Children from Sexual Offences Act 2012, seeking recall of child/victim for further cross-examination. This plea was filed under Section 311 CrPC/348 BNSS [2] which gives the Court power to recall and re-examine any witness at any stage of the trial if it believes their testimony is crucial to the case. The question which falls for consideration is whether in the exercise of its powers under Section 311 of the CrPC / Section 348 BNSS, the Special Court ought to have recalled the child/victim for re-examination as witness, keeping in mind the provision under Section 33(5)[3] of the Act. The POCSO Act is a special legislation, which was enacted to protect children from sexual offences and for safeguarding interests and ensure the well-being of child at every stage of offences under the Act. Section 33 of POCSO Act provides for procedure and power of Special Court and within sub clause (5) bare perusal indicates a duty of Special Court to ensure that a child is not repeatedly called to give testimony before the court. This provision ensures that the child, who has already endured the trauma of sexual abuse, is not subjected to further emotional distress by being summoned to court multiple times.

While the provision is not an absolute bar, it reflects the legislative intent to safeguard the well-being of the child throughout the trial process. The question whether in the given facts and circumstances, plea of the petitioners for recalling the victim for re-examination have been allowed by the Special Court is guided by *State (NCT of Delhi) v. Shiv Kumar Yadav*[4], which outlined the principles guiding a Court's power under Section 311 of the CrPC. It stressed that such request must be made with genuine intent and cannot be granted routinely that is the Court must exercise its discretion judiciously and not arbitrarily particularly involving children. The plea filed by the accused seeking to recall the victim for further cross-examination, can cause further trauma. The legal system has a duty to minimize the emotional distress of child victims, particularly during trials and this ruling highlight the need to prevent unnecessary repeated appearances by child victims in court, ensuring they are not subjected to further psychological harm.

In this particular case, the accused was charged with kidnapping and sexually assaulting a minor girl, forcing her into marriage. The victim, who was just 15 years old at the time, was already cross-examined twice, and the defence had sufficient opportunity to question her. The decision is important as in Sexual assault cases, especially those involving minors, are deeply traumatic. While this provision is essential for ensuring justice, it must be exercised carefully, especially in sensitive cases involving minors. Justice Dhulia remarked that mechanically allowing such applications, particularly in POCSO cases, would defeat the very purpose of the law, which is to protect children from unnecessary trauma. The defence had ample opportunity to cross-examine the victim, and recalling her again would be against the intent of the POCSO Act. The Supreme Court's decision in this case reflects a commitment to balance the rights of the accused with the need to protect child victims from further harm.

By dismissing the plea to recall the victim, the Court reaffirmed the importance of shielding children from repeated trauma during legal proceedings.

[1] Special Leave Petition (CrL) No. 10082 of 2024.

[2] The Code of Criminal Procedure, No. 2 of 1974, § 311, India Code (1974).

[3] The Protection of Children from Sexual Offences Act, No. 32 of 2012, § 33(5), India Code (2012).

[4] (2016) 2 SCC 402.

Under the Nyaya Bandhu Programme, Department of Justice, Ministry of Law & Justice, Government of India

PETITION IN SUPREME COURT OPPOSING BAN ON BLOOD DONATIONS FROM TRANSGENDERS

Isha Arora



On August 2, 2024, the Supreme Court of India issued a notice to the Union Government regarding a petition challenging the constitutional validity of the "Guidelines on Blood Donor Selection and Blood Donor Referral, 2017." These guidelines, issued by the National Blood Transfusion Council (NBTC) and National AIDS Control Organization (NACO), aim to ensure safe blood donations by excluding individuals considered at high risk for infections.

Under clauses 12 and 51, gay men and transgender individuals are barred from donating blood due to their categorization as "at risk". The Supreme Court has linked this petition to a similar case, "Thangjam Santa Singh @ Santa Khurai v. Union of India WP(C) No. 275 of 2021", where the government argued that transgender persons, Gay individuals and female sex workers are at a higher risk of Hepatitis B or C infections and HIV. The petition challenges this classification and the resulting exclusion from blood donation.

Overview of the 2017 Guidelines for blood donor selection and referral

The "Guidelines for Blood Donor Selection and Blood Donor Referral, 2017", issued by the NBTC and NACO, establish the criteria for blood donation in India. These guidelines are aimed at ensuring the safety of both donors and recipients by outlining who is eligible to donate blood. However, certain clauses in these guidelines have been criticized for being discriminatory, particularly towards specific groups. Clause 12 of the guidelines permanently defers Gay individuals, transgender individuals, and female sex workers from donating blood, categorizing them as being at higher risk for Hepatitis C or B and HIV infections. Similarly, Clause 51 addresses the exclusion of individuals who may be at risk of transmitting infections through blood donation, reinforcing a blanket ban on these groups without considering individual risk assessments or advances in medical screening technology.

Petition challenges outdated blood donation guidelines and cites global shifts

Sharif D. Rangnekar, A gay author filed the petition and contended that the 2017 guidelines issued by the NBTC and NACO violate the fundamental rights to equality, dignity, and life guaranteed to every citizen under the Constitution of India as it prevents members of the LGBTQ+ community and female sex workers from donating blood. The petition argues that countries, such as the USA, UK and Canada, have revised their rules to allow gay individuals for blood donation, reflecting a more modern understanding of public health and medical technology. It states that the Indian guidelines are based on outdated perceptions from the 1980s and fail to consider advancements in blood screening techniques. The petition provides a historical context, noting that the initial bans on blood donations from men who have sex with men were implemented during the HIV epidemic in the United States in 1983 to limit the spread of the virus. These bans also affected people from certain regions and those with specific medical conditions. Furthermore, the petition references a press release from the health ministry, which highlights the demand in case of blood transfusions in India—every two seconds, a blood transfusion is required, resulting in an annual shortage of one million units. The Ministry itself underscores the need to dispel myths around blood donation and to encourage broader public participation.

Proposed Legal Reforms for Inclusive Blood Donation Practices.

The petition seeks several directives from the Supreme Court to address what it describes as discriminatory and outdated blood donation guidelines. It calls for a declaration that clause 12 and 51 in the 2017 guidelines are unconstitutional, as they unfairly exclude Gay individuals from donating blood. In place of these provisions, the petitioner urges the formulation of new guidelines that would permit such individuals to donate blood under reasonable screening and deferral policies. Additionally, the petition advocates for sensitization programs to reduce stigma and for public awareness campaigns to educate society about safe blood donation practices. It also highlights the need for changes in the medical education curriculum to train future healthcare professionals on inclusive blood donation policies.

IRAC Analysis

SAKIRI VASU V. STATE OF UTTAR PRADESH AND OTHERS (2008) 2 SCC 409

Poorvi

Facts:

The appellant filed this appeal, dissatisfied with the judgment and order of the Allahabad High Court, dated 13.07.2003, in Criminal Misc. Writ Petition No. 9308 of 2007. The case revolves around the death of the appellant's son, Major S. Ravishankar, who served in the Indian Army. His body was discovered at Mathura Railway Station on 23.08.2003. The Government Railway Police (GRP) of Mathura conducted an investigation and, on 29.08.2003, concluded that the death was either the result of an accident or suicide. During the investigation, the court considered statements from the Sahayak (domestic servant) and a key eyewitness, Ram Swaroop. The Sahayak reported that Major Ravishankar often appeared withdrawn, sitting in the verandah staring blankly at the ceiling, seemingly lost in thought and detached from his surroundings.

Meanwhile, Ram Swaroop, a Gangman, testified that Major Ravishankar was struck by a goods train traveling from Delhi. However, the deceased's father suspected foul play and argued that his son had been murdered. He claimed that Major Ravishankar had spoken about corruption within the Mathura Army unit and had reported it to his superiors, which he believed was the motive behind the murder.

An initial investigation by the Army in 2003 concluded that the death was a suicide. Unconvinced, the appellant requested a further inquiry on 24.04.2004 by the then Chief of Army Staff, Gen. N.V. Vij. However, this investigation reaffirmed the earlier conclusion of suicide.

Dissatisfied with both Army inquiries, the appellant approached the Allahabad High Court, seeking a Central Bureau of Investigation (CBI) inquiry into his son's death. The High Court dismissed his petition, prompting the appellant to file this appeal before the Supreme Court by special leave.



Issues:

1. Whether the Magistrate has the power to order further investigation under Section 156(3) of the Code of Criminal Procedure, 1973 (CrPC)?
2. Whether an individual can approach the High Court even if there are alternative remedies available in CrPC?

Rule:

1. §154(3) of the CrPC 1973 and §173 of the Bhartiya Nagarik Suraksha Sanhita, 2023 (BNSS) – information in cognizable cases.
2. §156(3) of CrPC and §175 of BNSS - police officer's power to investigate cognizable case.
3. §36 of CrPC and §3 of BNSS – the power of a superior officer of police.
4. §482 of CrPC and §528 of BNSS – saving of inherent powers of High Court.
5. §200 of CrPC and §223 of BNSS – Examination of complainant.

1. Supreme Court notice to Centre on plea challenging guidelines debarring blood donation by transgenders (deccanherald.com)

2. Blood Donation Guidelines: SC notice to Centre on plea challenging guidelines debarring blood donation by transgenders, ET LegalWorld (indiatimes.com)

3. Supreme Court Petition Challenges Ban on Blood Donations by Gay Individuals (livelaw.in)

Analysis:

1. Whether the Magistrate has the power to order further investigation under Section 156(3) of CrPC,1973?

The Hon'ble Supreme Court in *Mohd. Yousuf v. Afaq Jahan*, (2006) 1 SCC 627 observed that a Judicial Magistrate has the authority to order an investigation under Section 156(3) of the CrPC before taking cognizance of an offense. In such cases, the Magistrate is not required to examine the complainant on oath. The Magistrate can also direct the police to register an FIR to initiate the investigation, and the officer in charge of the police station must do so as per Section 154 of the CrPC. Even if the Magistrate does not explicitly mention the need to register an FIR, it is the police officer's duty to do so if a cognizable offense is revealed.

Further, in *Dilawar Singh v. State of Delhi*, (2007) 12 SCC 641 the Court reaffirmed this position and added that if an FIR is registered and the investigation is deemed unsatisfactory by the aggrieved party, they may approach the Magistrate under Section 156(3) CrPC. The Magistrate can then order a proper investigation and take necessary steps to ensure that a thorough investigation is conducted. Section 156(3) of the CrPC grants the Magistrate supervisory authority over police investigations under Chapter XII. If the Magistrate determines that the police have either failed to investigate a case or have not conducted a satisfactory investigation, the Magistrate may direct the police to conduct a proper investigation and oversee the process.

The Magistrate's power has broad scope pertaining to Section 156(3) and the power to order further investigation under Section 156(3) operates independently. Furthermore, it does not limit the investigating officer's authority to pursue further investigation, even after submitting a report under Section 173(8). Thus, the Magistrate can order the reopening of the investigation if necessary. The same has been observed in *Bihar v. JAC Saldanha*, (1980) 1 SCC 554. The Hon'ble bench has also relied upon doctrine of implied power which has been simply put into words as, "What is necessarily implied is as much part of the statute as it were specifically written therein." The reference of doctrine of implied power has been taken from *ITO v. M.K. Mohammad Kunhi*, AIR 1969 SC 430; *Union of India v. Paris Laminates*, (1990) 4 SC 453; *RBI v. Peerless General Finance and Investment Co. Ltd.*, (1996) 1 SCC 642 and others mentioned in para 22 of the judgment. Justice MarkandeyKatju taking reference from Hon'ble Supreme Court's observation in *CBI v. Rajesh Gandhi*, (1996) 11 SCC 253 stated that the aggrieved party can appeal that investigation must be done properly but a claim that investigation be done by a particular agency cannot be made.

2. Whether an individual can approach the High Court irrespective of alternative remedies available in CrPC,1973?

The primary question addressed here is whether a person can approach the High Court directly, bypassing alternative remedies provided in the Code of Criminal Procedure (CrPC), 1973, such as seeking relief under Section 482 CrPC or filing a writ petition when the police fail to register an FIR or conduct a proper investigation. It was observed by the Hon'ble Court in *Dilawar Singh v. State of Delhi* (supra) that an individual dissatisfied with the police investigation has several remedies available before approaching the High Court. It was established in *Union of India v. Prakash P. Hinduja*, (2003) 6 SCC 195, that a Magistrate cannot interfere with an ongoing police investigation. However, this applies only when the investigation is being conducted properly. If the investigation is flawed or incomplete, the Magistrate can intervene under Section 156(3) to ensure a proper investigation. The court vividly clarified in *CBI v. State of Rajasthan*, (2001) 3 SCC 333, that while a Magistrate cannot order an investigation by the Central Bureau of Investigation (CBI), both the Supreme Court and the High Court have the authority to do so under Article 136 or Article 226 of the Constitution.

However, this power should only be exercised in rare and exceptional cases, not as a routine matter. Furthermore, in *Secretary, Minor Irrigation & Rural Engineering Services, U.P. v. Sahngoo Ram Arya*, (2002) 5 SCC 521, it was emphasized that the High Court should only order a CBI inquiry after being satisfied that the material on record establishes a prima facie case requiring such an investigation. A CBI inquiry should neither be ordered merely because allegations have been made, nor should it become a routine response to every grievance related to a police investigation. The Supreme Court, in the aforementioned judgments, has stressed that individuals should first exhaust the alternative remedies available under the CrPC before approaching the High Court. Section 154(3) provides a mechanism to escalate the matter to higher police authorities, and Section 156(3) allows the Magistrate to intervene and ensure a proper investigation. Additionally, if the individual remains unsatisfied, they may file a criminal complaint under Section 200 CrPC. Direct recourse to the High Court under Article 226 or Section 482 CrPC should be discouraged unless the case presents exceptional circumstances that justify such intervention. The High Court's role is to intervene sparingly and only in cases where there is clear evidence of miscarriage of justice or a lack of a proper investigation.

Thus, following guidelines were laid down in the *Sakiri Vasu* case-

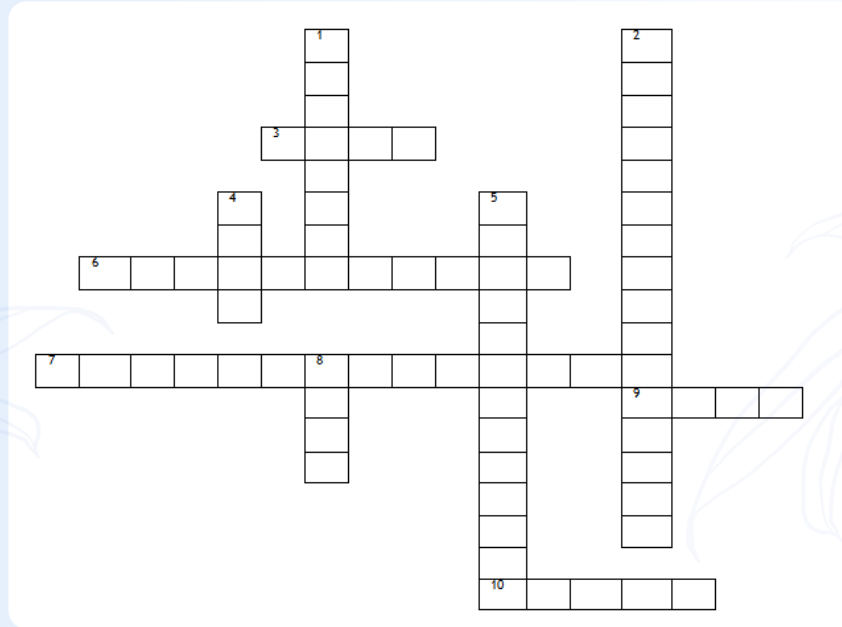
- Submit a complaint to the officer in charge of the police station under Section 154(1) of the CrPC.
- If the officer refuses to register an FIR, escalate the matter to the Superintendent of Police (SP) under Section 154(3) of the CrPC.
- If the issue persists, report the matter to a higher police authority, such as the DIG, DGP, or IG, under Section 36 of the CrPC.
- In the event that none of the police authorities file an FIR, approach the judicial magistrate under Section 156(3) of the CrPC.
- The judicial magistrate holds the authority to file a criminal complaint under Section 200 of the CrPC.
- The High Court possesses inherent powers to intervene under Section 482 of the CrPC.
- A writ petition can also be filed in the High Court or Supreme Court under Article 226 of the Constitution.

Conclusion:

In this case, the Supreme Court reinforced the importance of utilizing alternative remedies under Sections 154 and 156 of the CrPC before approaching higher courts. It emphasized that individuals aggrieved with the non-registration of an FIR or improper investigation should first seek redressal by escalating the matter to senior police officers under Section 154(3) or by approaching the Magistrate under Section 156(3), rather than filing a writ petition in the High Court. This approach was affirmed in *Sudhir Bhaskarrao Tambe v. Hemant Yashwant Dhage* (2016) 6 SCC 277, wherein the Court discouraged the direct filing of writs for such grievances. The Court clarified that the Magistrate has the authority to order and monitor investigations, ensuring a proper legal process. This decision endorses judicial efficiency and prevents an unnecessary burden on the High Courts and the Supreme Court by promoting the use of prescribed statutory remedies.

1. Article 226, The Constitution of India
2. Article 32, The Constitution of India
3. Article 136, The Constitution of India
4. Article 21, The Constitution of India

FUN WITH WORDS



Crossword designed by: Shivam Singh and Karunesh Jain

Across

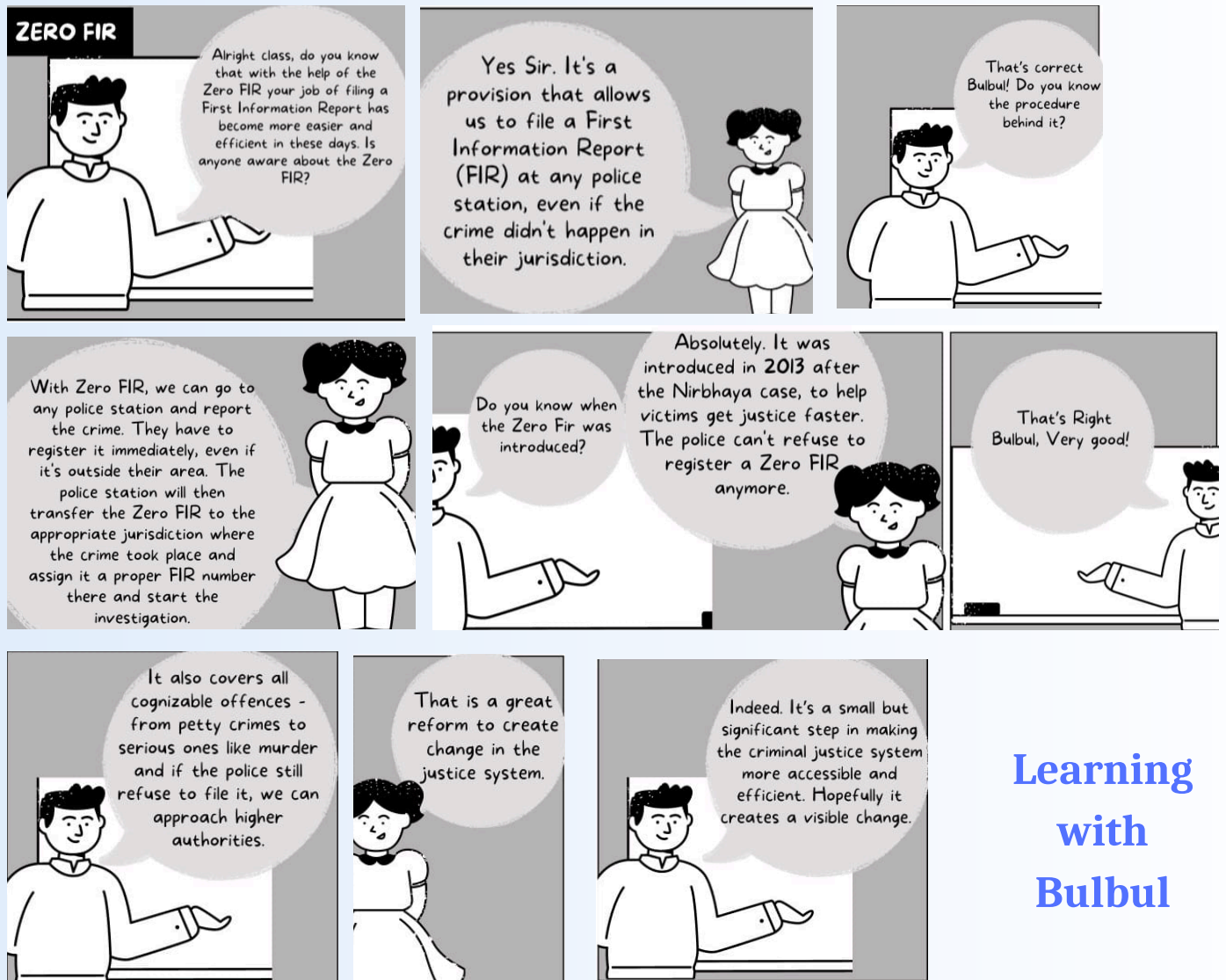
3. In the Bhartiya NyayaSanhita, if a serial thief who specializes in "blink-and-you-miss-it" heists in crowded markets gets caught again, how many years of rigorous imprisonment could they win this time?
6. I'm a "team effort," but not the kind you want to join. When five or more get together, fueled by hate, someone's fate turns dire. Motivated by race, caste, or belief, I lead to a life sentence or worse. What am I?
7. In the shadows of society, there's a secret club where members engage in shady business for profit—like a very exclusive "friends with benefits" arrangement, but instead of romance, they're into trafficking, extortion, and corruption! What's the catchy term that describes this well-structured band of mischief-makers keeping law-abiding folks on their toes?
9. In Section 64 of new criminal law, there's an offense so heartbreaking that it leaves trust, dignity, and the body feeling shattered—what crime does the law strive to punish, so that no one has to endure such deep sorrow ever again?
10. In the grand legal reboot, who's the new superstar that boots 'dand' out of the scene and steals the spotlight as the government's main act?

Down

1. Once the state's tool to protect unity and stability, this charge ensured that efforts to undermine the nation's security were kept in check. Recently reformed by the Bharatiya Nyaya Sanhita, it played a key role in safeguarding the country's integrity. What was this now-obsolete offense?
2. For minor wrongs, no cell nor coin, just duties to help the world rejoin!
4. As the scorching days lingered and the promise of rain was near, which month ushered in the nationwide applicability of three transformative criminal laws?
5. If you think summer sessions are warm and cozy, think again! Imagine a lively parliamentary session where exciting new criminal statutes are passed. What joyful session embodies a season of significant and transformative change?
8. In the epic saga of crime reporting, which type of FIR ensures your complaint gets filed no matter where you are, leaving jurisdictional excuses behind?

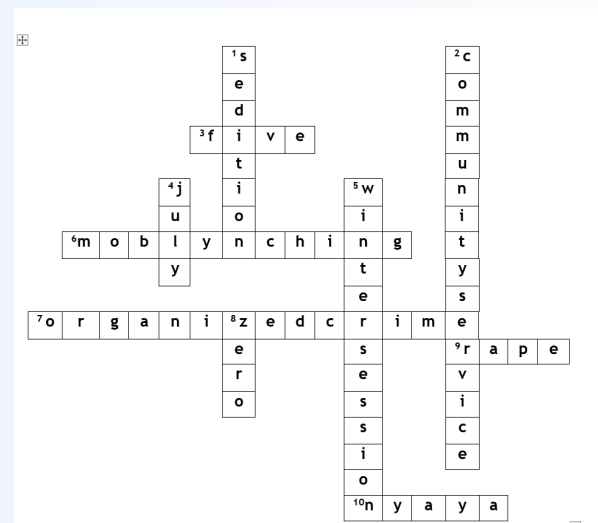
(Answers to the crossword on the final page)

Under the Nyaya Bandhu Programme, Department of Justice, Ministry of Law & Justice, Government of India



Learning
with
Bulbul

Dialogues by: Druti Dutta
Illustration by: Shruti Mehta



Conceived and Conceptualized by Dr. Megha Nagpal, Assistant Professor - SLS Noida
Newsletter Designed by Newsletter Team for Pro Bono Club, SLS NOIDA

Pro Bono Associates

Academic Year 2024-25

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3. **Advika Devanshi**
4. **Vrinda**
5. **Poorvi**
6. **Shatakshi Dwivedi**
7. **Anurakta Sharma**
8. **Isha Arora**
9. **Aishnai Singh**
10. **Radhika Chugh**
11. **Parth Vinayak Ghare**
12. **Tuhina Deb**
13. **Pihoo Agrawal**
14. **Sanvi Mathur**
15. **Diksha**
16. **Druti Dutta**
17. **Harsh Deep Garg**
18. **Anmol Kothari**
19. **Shruti Mehta**
20. **Shivam Singh**
21. **Drishti Bansal**
22. **Karunesh Jain**

The Pro Bono Club, SLS Noida, with sheer commitment in their hearts promises to work with utmost dedication to serve and stand for the good.