
Preliminary Enquiry Under Section 173(3) of the Bharatiya Nagarik Suraksha Sanhita 2023: A Constitutional and Procedural Analysis

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Abstract

This article will look at Section 173(3) of the Bharatiya Nagarik Suraksha Sanhita (BNSS) 2023, applicable to certain cognizable offences which are punishable by 3-7 years, which is conditional upon prior preliminary enquiries (PE) undertaken before the registration of the First Information Report (FIR). The BNSS requires, under section 173(3), that if a PE is undertaken, it has to be approved by the specific police authority before the PE or any other investigation takes place, and it also provides a 14-day time period once approval is granted. This article will examine the constitutional validity of this provision from the perspective of the *Lalita Kumari v. State of U.P.*² Decision, which provides that once the cognizable offences are presented to a police officer, they are required to register the FIR. It will argue that Section 173(3) provides a possibility of further expansion of police officer discretion concerning FIR registration, thereby infringing an accused's procedural fairness and access to justice guaranteed by Article 21 of the Constitution.³ This article is going to do some doctrinal and comparative research to argue that whilst it may appear that the BNSS 2023 will improve the efficiency of investigation and gives an account for police accountability through procedural intervention, the effectiveness of the BNSS 2023 hinges on police behaviour being subject to the oversight of the judiciary to reduce excesses of power and preserve the protections and perimeters of the Constitution.

Keywords

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² *Lalita Kumari v. Govt. of U.P. & Ors.*, (2014) 2 SCC 1, AIR 2014 SC 187

³ Article 21 of the Constitution of India

Preliminary Enquiry, Section 173(3) BNSS 2023, FIR Registration, Police Discretion, Constitutional Validity, Article 21 Procedural Fairness.

1. Introduction

The enactment of the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS) is an important shift in the aims of India's criminal procedural law to modernize and provide an efficient architecture for the administration of criminal justice. There are many important changes to existing processes and procedures under the BNSS, with the most novel being the inclusion of Section 173(3), which establishes a statutory procedure for a preliminary enquiry to be conducted by police authorities upon receiving information related to certain cognizable offences.⁴ Section 173(3) operates as an exception to Section 173(1), which mandates the immediate registration of an FIR upon receipt of information relating to a cognizable offence.⁵ Section 173(3) is novel not only for the BNSS, but it reflects a significant detachment from the process for reporting cognizable offences within the Code of Criminal Procedure, 1973 (CrPC), as it relates to the registration of First Information Reports (FIRs) and the investigative discretion of police.

1.1 Scope of Preliminary Inquiry under the Bharatiya Nagarik Suraksha Sanhita:

Section 173 (3) of the BNSS states that when the officer in charge of a police station receives information regarding cognizable offences with a punishment of not less than three years and not more than seven years, the officer in charge of a police station will obtain prior permission from at least the level of Deputy Superintendent of Police, considering the nature and gravity of the offence. If the proper permission is obtained for the nature of the offence and the gravity of the offence, the officer in charge will have two possibilities to consider.⁶

First, the officer in charge may conduct a preliminary inquiry within 14 days to determine if there is any prima facie case to proceed with any investigations. Second, if a prima facie exists which warrants quicker investigation, he might simply commence investigations right away.⁷

However, if he thinks that there is no prima facie case made out to proceed, he shall notify the first informant/complainant immediately so that he can avail of the remedy under subsection (4) of section 173.

⁴ Section 173(3) of Bharatiya Nagarik Suraksha Sanhita, 2023

⁵ Section 173(1) of Bharatiya Nagarik Suraksha Sanhita, 2023

⁶ Section 173(3) of Bharatiya Nagarik Suraksha Sanhita, 2023

⁷ <https://www.drishtijudiciary.com/current-affairs/section-173-of-bharatiya-nagarik-suraksha-sanhita-2023>

1.2 Scope of Preliminary Inquiry under the Code of Criminal Procedure, 1973:

Section 154 of the CrPC does not provide anything regarding such inquiry, therefore, the scope of preliminary inquiries under the Code of Criminal Procedure (CrPC) is limited. Unlike other courts, the Supreme Court in *Lalita Kumari v. State of Uttar Pradesh (2014)*⁸ said that a preliminary inquiry can only be undertaken if the information received does not indicate the commission of a cognizable offence but is such that further verification is required. Consequently, the police inquiry can only be confined to determining whether the information discloses a cognizable offence. In such circumstances, if the limited inquiry shows there is a cognizable offence, then the FIR needs to be registered, and no preliminary inquiry is permitted. On the other hand, if the information shows on its face that a cognizable offence was committed, then the police must register the FIR without any preliminary inquiry.

1.3 The constitutional and procedural implications:

Section 173(3) is an exception to the duty codified in Section 173(1) to immediately register an FIR when the police obtain information about a cognizable criminal offence.⁹ This artificial distinction has caused a huge amount of debate, not least given the Supreme Court of India jurisprudence on the matter in *Lalita Kumari v. State of Uttar Pradesh*¹⁰, where it had otherwise limited the conditions within which a preliminary enquiry could take place to matters where the information received disclosed no cognizable offence. The BNSS, however allows a preliminary enquiry even where the information received does disclose a cognizable offence if it is within the punishable limits stated.

In a recent judgement of the Supreme Court, in *Imran Pratapgadhi v. State of Gujarat (2025)*, the bench of Justice Abhay S Oka and Justice Ujjal Bhuyan held that in any alleged instance of the commission of a cognizable offence with the potential punishment of up to 7 years' imprisonment based on spoken or written words, it is commonly advisable to take the option in sub-Section (3) of Section 173 and just do a preliminary inquiry to determine if it is appropriate to proceed concerning the prima facie case.¹¹

In this approach, it is possible to strike an appropriate balance between constitutional rights, for instance, the right to life and personal liberty, under Article 21, against unreasonable state action, under Article 22 of the Constitution, and timely law enforcement.

⁸ *Lalita Kumari v. Govt. of U.P. & Ors.*, (2014) 2 SCC 1, AIR 2014 SC 187

⁹ Section 173(1) of *Bharatiya Nagarik Suraksha Sanhita*, 2023

¹⁰ *Lalita Kumari v. Govt. of U.P. & Ors.*, (2014) 2 SCC 1, AIR 2014 SC 187

¹¹ *Imran Pratapgarhi v. State of Gujarat*, 2025 INSC 410 (Supreme Court of India, decided on 28 March 2025)

2. Literature Review

2.1 Section 173(3) BNSS: Statutory Innovation and Doctrinal Shift

Section 173(3) of the BNSS represents a notable deviation from the CrPC scheme. This provision provides that the officer in charge of a police station can, when provided with information about the commission of a cognizable offence where the punishment is not less than three years and less than seven years' imprisonment, carry out a preliminary enquiry, subject to the approval of an officer not below the rank of Deputy Superintendent of Police. That enquiry must be completed in 14 days and will be used to determine if a prima facie case exists before shifting to an investigation. In effect, the provision creates a discretionary, supervisory, and time-limited requirement for screening cases at the front end, without specific tests, to 'filter' out frivolous or insupportable FIRs so that the costs and resources of the criminal justice system are properly allocated.

2.2 Judicial Interpretations

The police officers had begun to refrain from filing FIRs to present a lesser crime rate in the area for their benefit and at the expense of the victim. Subsequently, the judicial interpretations in relation to FIRs and Preliminary Inquiry appeared.

2.2.1 State of Haryana & Ors. v. Ch. Bhajan Lal & Ors., (1992)- Till this case the court held that since there are no such words as reasonable and credible in the section 154 CrPC, the police officer is bound to lodge the FIR without any examination of genuineness of information. Hence, there was no such procedure of PE.¹²

2.2.2 Ramesh Kumari v. State (NCT of Delhi), (2006)- The police started to conduct PE without any prior order or notice from a court of law to delay the filing of FIRs, when the judgment of Ramesh Kumari v. State (NCT of Delhi) was rendered and the court held that the genuineness of a FIR is a post FIR situation. Preliminary Inquiry will only be conducted when the police officer doubts whether the offence is cognizable or non-cognizable.¹³

¹² State of Haryana & Ors. v. Ch. Bhajan Lal & Ors., (1992) 1 SCC 335; AIR 1992 SC 604

¹³ Ramesh Kumari v. State (NCT of Delhi), (2006) 2 SCC 677; AIR 2006 SC 1322

2.2.3 Lalita Kumari v. Govt. of U.P. & Ors., (2014)- In this case, the constitutional bench held that the filing of an FIR in every case is mandatory. The court further directed that a Preliminary Inquiry can only be done in those cases which are civil but are sometimes represented as criminal ones, such as the following:

- Matrimonial Dispute
- Commercial Cases
- Corruption Cases
- Medical Negligence
- 3 months delay in Information Report

The court directed the PE to be done in these cases within 7 days.¹⁴

Lalita Kumari Judgement	BNSS Section 173(3)
To determine if cognizable offence exists	To assess prima facie case strength
Conducted only in specified cases if information is ambiguous	Conducted in all cases despite clear cognizable offence
To be done within 7 days	To be done within 14 days

2.2.4 Imran Pratapgarhi v. State of Gujarat, 2025 – In this case the Justice Abhay S. Oka and Justice Ujjal Bhuyan bench said that, in cases involving alleged cognizable offences punishable with imprisonment of up to seven years, based upon a verbal and/or written word, it is usually advisable for police to avail of the power conferred by Section 173(3) of the BNSS to undertake a preliminary inquiry to see if a prima facie case exists before taking any further action.¹⁵

2.3 Md. Imran Wahab, "Flaws in the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS): A Critical Study" – Section 173(3) of the BNSS is significantly different from the ruling of the Supreme Court in *Lalita Kumari v. State of Uttar Pradesh*, in which the Supreme Court held that the registration of FIRs must apply immediately upon getting information which discloses a cognizable offence, and that preliminary inquiry is permitted only in limited instances with confined exceptions like matrimonial disputes, commercial offences, or provisions for medical negligence. Section 173(3) grants police officers the authority to inquire, provided the offence is

¹⁴ *Lalita Kumari v. Govt. of U.P. & Ors.*, (2014) 2 SCC 1, AIR 2014 SC 187

¹⁵ *Imran Pratapgarhi v. State of Gujarat*, 2025 INSC 410 (Supreme Court of India, decided on 28 March 2025)

punishable by some imprisonment ranging from three to less than seven years.

This provision greatly expands the power for police discretion to conduct a preliminary inquiry, which expands the potential of the police to defer registration of an FIR by the powers under Section 173(3) in a broad range of situations.

The concern for critics is that there is too much discretion exercised by police when carrying out its function, resulting in too much leeway and possible inconsistency over the application over offences in recognition of the impact of additional procedural safeguards, and the former, and/or additional opportunity to misuse discretion, act unethically (or unlawfully) by summoning suspects when the power to arrest or investigate prior to the registration of the case raises considerations of personal liberty again and penalties sorry the system disallowing the complainant accessing timely justice.¹⁶

2.4 Team SACJ. "Balancing Act: The Discrepancy Between Section 173(3) BNSS and the Supreme Court Ruling in Lalita Kumari vs. Government of Uttar Pradesh." - The article highlights the problematic aspects of §173(3) of the Bharatiya Nagarik Suraksha Sanhita (BNSS); Bhadaï N.aj. v. Government of U.P, which is particularly relevant to the justice system. There are three important issues: the regard to the preliminary inquiry, which was a discretionary right created under §173(3); the time limits created concerning completing an inquiry; and the possible undermining of the independence that a supervisory judiciary is expected to embody. What this means is that a preliminary inquiry may now take up to 14 days, which is an inconsistency in that an FIR should be registered as soon as a cognizable offense is apparent. It ushers in a shared understanding of a policing discretionary enforcement environment, which ultimately results in vulnerability for complainants being denied justice or having a delayed resolution.

The article also criticizes the inconsistent approach to preliminary inquiries depending on the type of offence, which it argues can produce vagueness and inequitable treatment/application of law. It calls for a judicial authority to reconcile §173(3) with the decision of Lalita Kumari but further, to seriously consider whether and what limits constraints on which police agency may conduct preliminary inquiries are appropriate. It says, "that the discipline of the adversarial process ought to provide a stronger key divide than the discretionary cloak of the police investigatory process." Overall, the article supports a more, and agendas, of oversight, and public scrutiny about police

¹⁶ Md. Imran Wahab, "Flaws in the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS): A Critical Study," *International Journal for Multidisciplinary Research (IJFMR)*, E-ISSN: 2582-2160, Volume 6, Issue 5, September-October 2024, Article ID: IJFMR240528425.

use of their discretionary authority. The point of tension is a middle ground that considers complainants, the authority to pursue outcomes that work within a functioning criminal justice system, and a commitment to a legitimate, effective rule of law.¹⁷

3. Proponents of Section 173(3) BNSS, 2023

3.1 Filtering Frivolous Cases: Police may conduct a preliminary inquiry under section 173(3) if an offence is alleged to have been committed within 14 days. This process is to find whether a prima facie case exists for offences with a maximum penalty ranging from 3 to 7 years imprisonment. It may also be used by police to determine whether the case is susceptible to further investigation.

3.2 Reduced Burden: By filtering out baseless complaints, the provision aims to reduce the burden on the police force and the judiciary, allowing resources to be focused on cases with substantive merit.

3.3 Prior Approval: Another layer of oversight has been added with the requirement to obtain pre-approval from a senior officer (not below the rank of Deputy Superintendent of Police), which serves to help mitigate the risk of refraining from discretionary use in an abusive way.

3.4 Reduced Suffering of the falsely accused: Initial inquiries may reduce the trauma to innocent people being wrongly accused. A service that BNSS can provide. This inquiry can help BNSS to mitigate the mental distress and economic hardship experienced by the incorrectly accused. This action may save reputational harm, emotional trauma, and financial distress in a civil action and preserve principles of justice and fairness.

4. Opponents of Section 173(3) BNSS, 2023

4.1 Conflict with the Lalita Kumari Judgement: The primary issue is the conflict between section 173(3) of the BSS and the Supreme Court judgment in the case Lalita Kumari vs. Government of Uttar Pradesh.¹⁸ The BSS allows police officers to determine whether to conduct a preliminary inquiry or pursue a cognizable crime complaint to initiate their First

¹⁷ Team SACJ. "Balancing Act: The Discrepancy Between Section 173(3) BNSS and the Supreme Court Ruling in Lalita Kumari vs. Government of Uttar Pradesh." *SACJ*, 25 Dec. 2024

¹⁸ Lalita Kumari v. Govt. of U.P. & Ors., (2014) 2 SCC 1, AIR 2014 SC 187

Information Report (FIR) because cognizable offences with a punishment of imprisonment for a term from three to not exceeding seven years police officers have an opportunity, when proceeding from point of complaint to process to be investigated, to dismiss valid complaints and thus prevent a victim access to the legal justice system.

The BNSS allows for a preliminary inquiry of 14 days, but the position taken in Lalita Kumari is that a preliminary inquiry must be carried out within 7 days from the date of the cognizable offence being reported. It seems likely that procedural confusion exists between the BSS and Lalita Kumari, thus likely providing a procedural inconsistency outcome.

4.2 Potential for Misuse and Corruption: Having the police officer exercise discretion at any BNSS will put valid complaints in jeopardy and will unduly delay or deny justice to the complainants as explained by the Supreme Court in the Lalita Kumari case.¹⁹ The police officer has been granted discretionary power by §173(3), along with the potential of abuse and corruption. His/her independence is particularly vulnerable to the influence of powerful principals trying to influence a particular response to the preliminary inquiry outcome. The police officer must register an FIR when there is credible information to indicate a cognizable offence under two landmark Supreme Court cases: Bhajan Lal²⁰ and Ramesh Kumari.²¹

4.3 Inconsistency and Uneven Application of Law: The provision is inconsistent in that it allows for the exercise of discretion for serious offenses (that can be punished by three to seven years) while also mandating the police must register FIRs even for non-serious offences (punishable with potentially two years imprisonment or less). The disparity in treatment contributes to confusion and inconsistency as to how the law balances the treatment of serious versus non-serious offenses.

4.4 Potential Deterrence of Victims: While BNSS has a discretionary time window of 14 days, this may deter people from filing a FIR if they have suffered victimization, especially under exigent circumstances because victims might think of the process as "being too delayed" or "not fair" and may not complete accurate reports. The government should take action to make timely access to justice a right of the individual, and in order for the CJS to properly function, timely reporting is required. Any delay will only serve to undermine public confidence in the CJS, and as recognized in Lalita Kumari judgment.

¹⁹ Lalita Kumari v. Govt. of U.P. & Ors., (2014) 2 SCC 1, AIR 2014 SC 187

²⁰ State of Haryana & Ors. v. Ch. Bhajan Lal & Ors., (1992) 1 SCC 335; AIR 1992 SC 604

²¹ Ramesh Kumari v. State (NCT of Delhi), (2006) 2 SCC 677; AIR 2006 SC 1322

4.5 Procedural Hurdles for Complainants: Where the Station House Officer (SHO) denies the registration of an FIR under the CrPC the complainant can send a letter via registered post (as recommended) to the Superintendent of Police (SP) and the SP will have to investigate or arrange for an investigation to take place. In relation to the BNSS if the reply from the SP is still not satisfactory to the informant, the informant, as per the BNSS, will have to apply to the Magistrate by way of affidavit, and seek an order for investigation, which the magistrate will have to make pursuant to §175(3) of the BNSS. This provision is new; and provides a choice option for an informant to apply to the magistrate for an order for investigation. All this adds to the delay in justice.

5. Balancing Interests

Section 173(3) of the BNSS presents a dilemma around the efficiency of police responses to complaints and the importance of an individual complainant's entitlement to the timely processing of a complaint. Section 173(3) allows a police officer, responsible for a serious offence with a penalty of imprisonment for three years to seven years, to conduct a brief initial inquiry into an actual cognizable offence before deciding whether to prepare a FIR. This could have the effect of delaying the FIR register and is contrary to the requirement established in Lalita Kumari to register FIRs immediately when there is a cognizable offence as disclosed by the police officer.

The challenge remains, how to achieve something about these two different emphases and perspectives, and yet leave everyone satisfied, and is a critical balance between the efficiency of the process around the police response and the merits of the appropriate police action. The original intention of an initial inquiry to filter out entirely vexatious complaints, to protect the complainant from any future injustice, trauma or harassment, and to ensure that police resources are not used inappropriately, must be able to be wholly appreciated at all times. If a police officer uses too much discretion, it can have the potential to cause unwarranted delay and injustice, for the complainant (both a) as an individual and b) as a member of society), and ultimately risk a loss of public confidence, reputational risk and gladly blame others for enforcement of the legal system.

6. Recommendations

6.1 Judicial Clarification: The further still the Supreme Court goes in the way of clarifying guidance, as to when there may be grounds to launch a preliminary inquiry under Section 173(3). As in the Lalita Kumari case, the

Court should expressly state that preliminary inquiries can't slow the obligation to file an FIR, where one is necessitated. More to the point, the Court should explain what is meant by "the nature and gravity of the offence" and thereby restricting unfettered discretion.

6.2 Narrowly Defined Exceptional Circumstances: Initial inquiries ought to have certain categories, like divorce-related dispositions, commercial-type criminal dispositions, medical malpractice dispositions, late reported jail-type cases. Having this complete, inclusive list would define what it all means by limiting discretion.

6.3 Strict Adherence to Timelines: The preliminary inquiries time limit of 14 days in terms of section 173 (3) (or otherwise prescribed time in other local laws) should be strictly enforced, with detail provided on enforcement processes and accountability if timeframes go too far. Timeframes beyond 14 days should require strict reasoning and judicial approval.

6.4 Enhanced Supervisory Oversight: There ought to be reliable oversight mechanisms in place so that the discretion of police officers to not register an FIR under s. 173(3) is overt and accountable. This could better support oversight via the creation of review panels or requiring written explanations to justify decisions to not register an FIR with review by other oversight bodies or a court. Independent audits or routine performance reviews could increase accountability in this context.

6.5 Protection of Rights During Preliminary Inquiry: Create protections that focus on the rights of complainants and accused persons in the preliminary inquiry process. Where a person is invited to an inquiry a person should advise the suspect of their rights including the right to remain silent and the right to seek legal advice. Coercion at an inquiry cannot be accepted.

6.6 Independent Review Boards: Establish independent review boards of retired judges, lawyers and community members to observe the preliminary inquiry process. These boards will provide another layer of accountability and can help make sure that inquiries are fair and unbiased.

6.7 Legal Aid and Awareness: Enhance legal aid mechanisms and public awareness strategies so that people can learn about their rights and how to take action if they believe the Section 173(3) has been misapplied or abused in their case.

7. Conclusion

There are a few reasons for concern over the introduction of Section 173(3) of the Bharatiya Nagarik Suraksha Sanhita (BNSS). First, Section 173(3) is capable of being interpreted in many ways and not only constitutionally and procedurally as sought to be covered in the Amendment. While the objective is to prevent unnecessary delay in the criminal justice system by allowing police to exercise their discretion in carrying out a preliminary inquiry in cognizable offenses with a prescribed punishment of imprisonment of a maximum of three - seven years, it is important to re-evaluate how a police preliminary inquiry stands in complete contrast to the legally settled regime established. The fundamental issue involves the AKS act's arbitrary empowering of police officers to conduct a preliminary inquiry under the BNSS before laying a First Information Report (FIR). The AKS acts contrary to the underlying provisions of the Lalita Kumari judgement that dictates police should investigate where a cognizable offense exists, and may conduct preliminary inquiries only in limited situations. The BNSS acts like the police's use of the 14 days for preliminary inquiries, aiming to have only 7 days in excess this time limit for investigations, that is also 7 days before the Criminal Investigation division of the criminal code can investigate at the Supreme Court past 14 days. The BNSS is trying to cause a delay at the start of a criminal prosecution, it compromises a timely prosecution of crime and to trial delays that may in part or whole dissuade victims from reporting crime, contrary to a timely justice process and damage public trust in the justice system. The law also ominously or depending in contrast would have amoral life also or live and die to an analytical edge of rational cause which would mean consequence absent accountability.

Further, the discretionary powers present in Section 173(3) also continue to provoke significant concerns about the potential for misuse and corruption. The outcomes that can be reached under Section 173(3) can be unreasonable because they are based on subjective notions instead of objective legal standards, which was part of the intention of the Lalita Kumari judgment. There has been no attempt to reconcile the divergent methods of providing discretion in more serious matters with requiring immediate action at a minimum when an FIR was recorded for smaller crimes. Although the discretion in Section 173(3) allows for an unreasonable blend of notions, but contributes to the continued confusion and inconsistent application of the law. The courts should be the first to take any steps to reconcile conflicted interests and should be addressing literal scope and application, to remain within constitutional norms in line with the established meanings in the Lalita Kumari case. There are obvious safeguards needed to ensure police discretion

in the application of Section 173(3) is made transparently and accountably. Ultimately, police should be striving for a delicate balance between upholding constitutional protections for individual rights while ensuring procedural expediency, and accountability for sustaining individual rights will ensure public trust and the actual integrity of the criminal justice system.

8. References

- (n.d.). *Article 21 of the Constitution of India*.
- (n.d.). <https://www.drishtijudiciary.com/current-affairs/section-173-of-bharatiya-nagarik-suraksha-sanhita-2023> .
- (n.d.). *Imran Pratapgarhi v. State of Gujarat, 2025 INSC 410 (Supreme Court of India, decided on 28 March 2025)*.
- (n.d.). *Lalita Kumari v. Govt. of U.P. & Ors., (2014) 2 SCC 1, AIR 2014 SC 187*.
- (n.d.). *Md. Imran Wahab, "Flaws in the Bharatiya Nagarik Suraksha Sanhita, 2023 (BNSS): A Critical Study," International Journal for Multidisciplinary Research (IJFMR), E-ISSN: 2582-2160, Volume 6, Issue 5, September-October 2024, Article ID: IJFMR240528425. .*
- (n.d.). *Ramesh Kumari v. State (NCT of Delhi), (2006) 2 SCC 677; AIR 2006 SC 1322*.
- (n.d.). *Ramesh Kumari v. State (NCT of Delhi), (2006) 2 SCC 677; AIR 2006 SC 1322*.
- (n.d.). *Section 173(1) of Bharatiya Nagarik Suraksha Sanhita, 2023*.
- (n.d.). *Section 173(3) of Bharatiya Nagarik Suraksha Sanhita, 2023*.
- (n.d.). *State of Haryana & Ors. v. Ch. Bhajan Lal & Ors., (1992) 1 SCC 335; AIR 1992 SC 604*.
- (n.d.). *Team SACJ. "Balancing Act: The Discrepancy Between Section 173(3) BNSS and the Supreme Court Ruling in Lalita Kumari vs. Government of Uttar Pradesh." SACJ, 25 Dec. 2024*.

