

Adjudication Process Of Cyber Offenses & Cyber Crimes With Women In India.

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ABSTRACT

Cybercrimes have traditionally targeted women and children, particularly girls. Given the seriousness of such offences, the criminal code has been modified while taking both social and legal considerations into account. According to statistics from the National Crime Record Bureau for 2019, there were 28% more incidents of cybercrime against women. In accordance with data, 10.2 percent of the 52,974 events recorded in 2021—or 10,730 instances—were reported as crimes against women. Special laws like the Protection of Children from Sexual Offences Act (POCSO) and the Information Technology Act have been enacted to protect the girl child as well from cyber offences, and our judiciary is adjudicating this offence. These laws were enacted in addition to general laws like the Indian Penal Code, Code of Criminal Procedure, and Indian Evidence, which were there to protect the rights of women and children. The authors also provide law reform recommendations for India to give victims of cybercrime prompt justice.

Keywords: women, females, cyber crimes, criminal law.

INTRODUCTION: -

The Vedas revered women as "Devi," or Goddesses, praising them as the mother, the creator, and the source of life. The status of women in traditional Indian culture is quite high. Women's oppression and abuse were considered as degrading to not just the women themselves but to the whole society because of their significant role in society. In many cultural contexts and activities, women are increasingly seen as inferior to men, and they are portrayed as sex objects.

As a result, there is now a serious gender bias between men and women, and even males think that their wrongdoings against women are not punishable. The criminally minded use this internet gift to commit crimes and then hide behind the cover provided by the internet. In the virtual reality of the cyberworld, anybody may conceal or even make up their identity. Digital India is the core of many innovations and technological developments. Computers, the internet, and other technologies are frequently used by more than half of the population. Facebook, chat rooms, Instagram, Skype, WhatsApp, dating websites, and other social media sites are the most widely used. On the one hand, digitalization has improved every aspect of India's system, including the government, education, and economy. On the other hand, it has also led to a sharp rise in cybercrime. Criminal activity is a social and economic phenomenon that is as old as human civilization. In essence, crime is a concept of law with a separate body of law. A crime or offence is defined as "a legal mistake that may be followed by criminal procedures that may result in punishment." Whatever its form, crime always affects society, either directly or via other means. As the use of computers and the internet has increased, new crimes have emerged; these crimes are sometimes referred to as "cyber crimes." Although the majority of victims are women, these crimes may target any demographic in society. In Indian culture, women are the genuine victims of cybercrime.

Cybercrime is a widespread issue. Technology has increased cybercrime and victimisation of women, which is a serious danger to an individual's overall security. Women's problems are still unaddressed under the IT Act 2000, despite India being one of the few nations to do so in order to fight cybercrime. According to the aforementioned Act, some actions including hacking, posting pornographic content online, and data tampering are criminal.

According to a recent survey commissioned by Norton, it was found that 8 out of 10 people in India have experienced online harassment wherein 41% of women became victims of Sexual harassment online¹.

CONCEPT OF CYBERCRIME:-

The term cybercrime is nowhere defined, this concept is varied because the crime which is going to commit by using any means of communication or the internet can be termed as a cyber crime. To comprehend the idea of cybercrime, one must first grasp the idea of crime, which is connected to computers and the internet. The idea of cybercrime is not fundamentally distinct from the idea of traditional crime. Both include behavior, whether it be an action or inaction, that violates the law and necessitates governmental retaliation. If a computer is either the object or the subject of activity that constitutes a crime, it is said to be a member of the same species as a traditional crime. Cybercrime is any illegal behavior that makes use of a computer, either as an instrument, a target, or a tool for committing other crimes.²

SOME OF THE CYBER OFFENCES ARE³:

1. **Harassment through e-mails:** It is not a new concept. It is very similar to harassing through letters. It includes blackmailing, threatening, bullying, and even cheating via email.
2. **Cyberstalking:** Stalking is defined as pursuing stealthily according to the Oxford dictionary. Following a person's movements across the Internet by posting messages sometimes threatening on the bulletin boards accessed by the victim, entering the chatrooms used by the victim, and by constantly bombarding the victim with emails, messages, etc. constitutes cyberstalking.
3. **Cyber pornography:** It is the most dangerous threat to the female netizens. This would include pornographic websites or pornographic magazines produced using computers to publish and print the material and the Internet (to download and transmit pornographic pictures, photos, writings etc. Internet has provided a medium for the facilitation of crimes like pornography, especially cyber porn.
4. **Cyber defamation:** Cyber tort including libel and defamation is another common crime against women on the net. This occurs when defamation takes place with the help of computers and/or the Internet.
5. **Morphing:** Editing of the original picture by unauthorized user or fake identity is termed as Morphing. It was identified that female's pictures are downloaded by fake users and again re-posted/uploaded on different websites by creating fake profiles after editing it.
6. **Email spoofing:** An e-mail which misrepresents its origin is spoofed mail. It shows its origin to be different from which origin.

LAW ON CYBER CRIMES:-

1. Indian Penal Code, 1860.

- a. **Section 354:** Assault or criminal force to woman with intent to outrage her modesty.
- b. **Section 354D** punishes stalking.

2. Protection of Children Against Sexual Offences Act, 2012.

- a. **Section 13** of the POCSO Act provides that whoever uses a child in any form of image for the purposes of sexual gratification which includes representing the sexual organs of a child, using a child in any real or simulated sexual acts, indecent or obscene representation of child, such person will be guilty of the offence of child pornography.
- b. **Section 14** provides punishment for child pornography which would extend upto 5 years and fine on first conviction and in case of subsequent conviction imprisonment for a term upto 7 years and fine.
- c. **Section 15** of the POCSO Act prohibits storage of pornographic material involving a child with imprisonment upto 3 years or fine or both.

3. Information Technology Act, 2000.

- a. Section 66E of the I.T. Act provides punishment for violation of privacy.
- b. Section 67 prohibits the act of publishing or transmitting any material which is obscene in nature and makes act punishable.
- c. Section 67 A provides punishment for publishing or transmitting material containing sexually explicit content and makes it punishable.
- d. Section 66 C: Any person who fraudulently or dishonestly makes use of the electronic signature, pass word or other unique identification feature e.g. photograph of a person without his consent is punishable.
- e. Section 66 D prescribes punishment for cheating by personation using a computer resource.

¹ Yuthika Bhargava, "8 out of 10 Indian have faced online harassment", The Hindu, 5th October, 2017.

² Cyber Crimes and the law, Legal India, legal news and law resource portal, available at <http://www.legalidia.com/cyber-crimes-and-the-law/>.

³ http://docs.manupatra.in/newsline/articles/Upload/786274E9-B397-4610-891228D6D03230F9.monika_jain_pdf_1-1111.pdf

- f. Section 67 B expressly prohibits child pornography.
- g. Section 66E provides punishment for violation of privacy.
- h. Section 72 A puts obligation on private service provider, who without the consent of such person whose personal information they collect under a lawful contract, discloses it to a third person in breach of the contract knowing it will lead to a wrongful loss is liable to be punished.

JUDICIAL APPROACH:

1. **State of Tamil Nadu v. Dr. L. Prakash**⁴. In this case, Dr. Prakash was convicted of committing Sexual harassment of women and posting obscene pictures and videos on the internet.
2. **Aarti Tiwari v. State of Chandigarh**⁵. In this case, obscene video and photographs were taken at the clinic by the accused of their patients, and the accused were tried under Sections 66E, 67, and 72 of the Information Technology Act, 2000.
3. **Avnish Bajaj v. State**⁶. In this case, an obscene MMS video was posted for sale on the website: www.bazee.com although the website had the required filter to detect such material, it failed to detect obscenity and published the same. Although the notice was sent to the service provider, the clip was not taken down expeditiously and the Managing Director of the website was arrested for committing the cybercrime of publishing obscene information online. In a petition for quashing of charges filed by the accused, charges were dropped under Section 292, but not under Section 67 of the I.T. Act r/w Section 85 of the I.T. Act which contains a provision for deemed liability of the director for acts of a company.

CYBER CRIME AGAINST WOMEN:-

Cybercrime against women is a well-known issue nowadays. Every second in India, a woman becomes a victim of cybercrime and the online podium has now become a new platform where the privacy, dignity, and safety of a woman are being challenged every second. Technology is a resource used by some criminals who aim to defame women by sending obscene e-mails, and WhatsApp messages, stalking women using websites, and chat rooms, and worst of all by developing pornographic videos, which Most are made without their consent, e-spoofing. The morphing of images to obscene material using various software available online. Indian women are not able to report cyber crimes immediately because they do not really know where to report such crimes or they are not serious about reporting it due to social shame which they do not want to face.

In cyber crimes against women, the impact is more mental than physical, while laws to ensure the safety of women focus more on physical than mental harm. In this, it can be said that there is a need to broaden the mindset of women especially and they should be alert and register complaints immediately to curb the daring-do against such criminals. Most of the problems can be solved if women report the crime immediately and warn the abuser of strict legal action. Cyber-criminals use computer technology to access personal information and use the Internet for purposes of harassment and exploitation which include stalking, blackmail, threats through emails, photo morphing, cyber pornography, etc..

Today criminals are misusing the cyber platform to harass and exploit women for strange pleasures in India. Women are mostly the object of cyberbullying, harassment, extortion, blackmail, etc. Women often trust criminals or criminals and share their personal information, resulting in many cybercrimes. Many times criminals have more opportunities to harass, abuse, blackmail, etc., women and children, because they do not know the procedure to file a complaint.

Cybercrimes against women through fake IDs created on Facebook, Twitter, and other social media platforms often cause serious harm to women, as large-scale blackmail, threats, intimidation, or messaging is carried out through these platforms. via messaging messages and email scams. criminals Malicious men commit these cyber crimes with malicious intent, such as illegal gain, revenge, indecent assault on a woman, extortion, blackmail, sexual exploitation, slander, incitement to hatred against the community, pranks to gain control, and information theft.

Objectives of IT Act, 2000

- Legal recognition for transactions carried out by means of electronic data interchange Digital Signatures and Regulatory Regime for Digital Signatures Admissibility of Electronic Documents at par with paper documents
- E-Governance Electronic Filing of Documents and E-Payments Define Civil wrongs, Offences, punishments Investigation, Adjudication, Cybercrimes including crime against women and children Appellate Regime

⁴ 2002(7) SCC 759.

⁵ MANU/CG/0285/2014.

⁶ MANU/DE/0851/2008.

- Amend existing Acts to address IT Act provisions Indian Penal Code & Indian Evidence Act-1872 Banker's Books Evidence Act-1891 & Reserve Bank of India Act-934

Specific provisions in IT Act for cybercrime against women

- Violation of privacy (section 66E)
- Obscene material (section 67)
- Pornography & sexually explicit act (section 67A)
- Child pornography (section 67B)

Section 66E – Punishment for violation of privacy

Whoever, intentionally or knowingly captures, publishes or transmits the image of a private area of any person without his or her consent, under circumstances violating the privacy of that person, shall be punished with imprisonment which may extend to 3 years or with fine not exceeding Rs. 2 lakh, or with both".

Section 67 - Punishment for Publishing or transmitting obscene material in electronic form

Whoever publishes or transmits or causes to be published or transmitted in the electronic form, any material which is lascivious or appeals to the prurient interest or if its effect is such as to tend to deprave and corrupt persons who are likely, having regard to all relevant circumstances, to read, see or hear the matter contained or embodied in it, shall be punished on first conviction with imprisonment of either description for a term which may extend to three years and with fine which may extend to five lakh rupees and in the event of second or subsequent conviction with imprisonment of either description for a term which may extend to five years and also with fine which may extend to ten lakh rupees.

Section 67A - Punishment for publishing or transmitting of material containing sexually explicit act, etc., in electronic form

Whoever publishes or transmits or causes to be published or transmitted in the electronic form any material which contains sexually explicit act or conduct shall be punished on first conviction with imprisonment of either description for a term which may extend to five years and with fine which may extend to ten lakh rupees and in the event of second or subsequent conviction with imprisonment of either description for a term which may extend to seven years and also with fine which may extend to ten lakh rupees.

Section 67B-Punishment for publishing or transmitting of material depicting children in sexually explicit act, etc. in electronic form

Whoever,

1. publishes or transmits or causes to be published or transmitted material in any electronic form which depicts children engaged in sexually explicit act or conduct; or
2. creates text or digital images, collects, seeks, browses, downloads, advertises, promotes, exchanges or distributes material in any electronic form depicting children in obscene or indecent or sexually explicit manner; or
3. cultivates, entices or induces children to online relationship with one or more children for and on sexually explicit act or in a manner that may offend a reasonable adult on the computer resource; or
4. facilitates abusing children online; or
5. records in any electronic form own abuse or that of others pertaining to sexually explicit act with children, shall be punished on first conviction with imprisonment of either description for a term which may extend to five years and with fine which may extend to ten lakh rupees and in the event of second or subsequent conviction with imprisonment of either description for a term which may extend to seven years and also with fine which may extend to ten lakh rupees."

Intermediaries due diligence rules under section 79

- **Intermediary**" with respect to electronic records means any person who on behalf of another person receives, stores or transmits that record or provides any service with respect to that record and includes telecom service providers, network service providers, internet service providers, web-hosting service providers, search engines, online payment sites, online-auction sites, online-market places, and cyber cafes"
- The IT (intermediary Guidelines) Rules 2011 requires that the intermediaries shall observe due diligence.
 - (i) Terms and conditions to be published including informing users about their dos' and don'ts.
 - (ii) Inform users not to upload content which is grossly harmful, harassing, defamatory, obscene, pornographic, paedophilic, invasive of another's privacy
 - (iii) Publish the name of the Grievance Officer and his contact details as well as mechanism by which users or any victim who suffers can complain.
 - (iv) The Grievance Officer shall redress the complaints within one month from the date of receipt of complaint.

SOME MAJOR CYBER CRIMES AGAINST WOMEN:-

Some of the major known cybercrimes have put thousands of women at risk due to various health problems such as depression, high blood pressure, anxiety, heart diseases, diabetes, and thyroid diseases. The main cyber crimes are the following: Cyber Bullying; Cyberbullying is on the rise and women are the most likely targets. Cyberbullying is a way of using the internet to harass someone for online bullying and abuse. A cyberbully does not directly engage in physical threats to a victim, but rather follows a victim's online activity to gather information, threatening various forms of verbal intimidation. harassment via email; Email harassment is not a new concept. It is just like harassing through letters. Harassment includes blackmail, threats, intimidation, and even cheating via email. Electronic bullying is similar to letter bullying, but it often causes problems when posted with a fake ID. defamation; Cyber defamation includes both slander and defamation. This includes posting defamatory information about the person on the website or circulating it among the social circle and friends of the victim or organization, which is an easy way to ruin the reputation of a woman by causing her painful suffering and mental agony. email forgery; Generally refers to an email that originated from one source but has been sent from another source. There can be a loss of money. identity fraud; Phishing is the attempt to obtain sensitive information, such as usernames and passwords, and the intent to obtain personal information. Change; Morphing is the editing of an original image by an unauthorized user or misidentification. The photographs of the identified women were downloaded by fake users and after editing the same were reposted/uploaded on various websites by creating fake profiles. objectionable; Trolls stir up controversy on the Internet, with the perpetrator starting a fight or harassing a victim by posting inflammatory or off-topic messages in an online community with the intent of eliciting an emotional and distressing response from the victim. Trolls are professional abusers who create and use fake IDs on social media to create a cold war environment in cyberspace and are not easy to track. cyber pornography; Cyber pornography is another threat to internet users. This would include pornographic websites; Porn magazines created using computers and the Internet. More about this source text required for additional translation information send feedback Side panels etc.,.

REASONS FOR THE GROWTH OF CYBER CRIME AGAINST WOMEN IN INDIA:-

Legal and societal factors can be grouped together to explain why cybercrime against women is on the rise. As it is very obvious, the statute that addresses cybercrime does not specifically mention those crimes under the relevant sections. In contrast, various laws, including the IPC and the Constitution, provide special protection for women, but the same protection does not appear to be provided generally under a specific statute. On the other hand, the majority of cyber crimes were unreported for a variety of different reasons, including the victim's reluctance, shyness, and fear of having her family's reputation tarnished. On the other hand, the majority of cyber crimes were unreported for a variety of different reasons, including the victim's reluctance, shyness, and fear of having her family's reputation tarnished.

ADJUDICATION PROCESS CYBERCRIMES:

Basically, adjudication processes in the offenses related to cybercrimes except for POCSO Act or Juvenile Justice Act cases are adjudicated by general criminal courts in India, in the following points I will be discussing how it is done:-

1. Through Police FIR:-

- At first in which area where the victim of a cybercrime resides or anyone got the information about a committed cybercrime, we have to file a FIR by following Section 154 CrPC at the local police station or any special police station which is specially established to deal with this type of offense.
- If the local police station refuses to take such FIR then we have to file a complaint by physically going to the Superintendent of Police (S.P) or the Commissioner of Police under whom that concerned local police station is having jurisdiction, by physically going in that police station or sending it by post by complying Section. 154 (4) CrPC & then initiating it as an FIR by lodging an application U/s. 156 (3) CrPC before Chief / Assistant Chief Judicial or Metropolitan Magistrate.
- Then on the basis of that FIR police will start investigation & file police report (CS / CR) U/s. 173 CrPC then on taking cognizance of that U/s. 190 CrPC concerned court will commence trial to examine the evidences against or favor the accused which is related to the case & on the basis of that court will give judgement of conviction with or without fine or acquittal to the accused.
- The case of cybercrimes which invokes the POCSO Act or Juvenile Justice Act in regards of them the same process will be followed by special POCSO or Juvenile Courts established by government as per said Acts.

2. Through Court:-

- In this process of adjudication the victim or complaint who have the information of cyber offence have to file a court complain U/s. 200 CrPC with all evidences before the Chief / Assistant Chief Judicial or Metropolitan Magistrate under whose local jurisdiction the offence was committed.
- Then then on taking cognizance of that of that complaint U/s. 190 & examining the evidences if court believes to have sufficient grounds to proceed the case the case the issue a process via warrant or summons U/s. 204 CrPC to the accused/s, concerned court will commence trial to examine the evidences against or favor the

accused which is related to the case & on the basis of that court will give judgment of conviction with or without fine or acquittal to the accused.

CONCLUSION & SUGGESTIONS:

The main problem of cybercrime lies in the modus operandi and the persistence of the cybercriminal. Law enforcement, judicial and investigative agencies need to keep up with the latest developments in web-based applications so that they can quickly identify the real offender. It is the job of the legal system and regulatory agencies to keep up with technological developments and to ensure that new technologies do not become instruments of exploitation and oppression. Governments can take legislative measures to guarantee human rights; Women's rights in particular are just as safe online as they are in physical spaces. Legislation should not only protect users; however, you must educate and inform all groups on how to exercise their communication rights. Also, people need to have both online and offline knowledge; Find out about the adoption of precautionary measures in cyberspace and how to file an appeal in case of violation of your rights. Although there used to be many difficulties in dealing with cybercrime, such as loss of evidence and lack of cyber forces, with the Criminal Law Reform Bill (2013) most of these problems have been fixed. However, many changes are still needed, such as cyber judges. Cyber crimes against women are still taken lightly in India, mainly because respect for women is declining in our modern society, many people cannot accept the fact that pictures of someone in crime are also posted online. Cyber crimes like morphing, and email spoofing have no moral support in society and hence are taken lightly. This brings us to the most important part where there is a need for social advancement, people need to recognize the rights of others and realize what constitutes a crime. They must learn not to interfere in the private lives of others; It is necessary to increase respect for women in society. All of this can only happen when young men are taught to respect women from an early age. Therefore, to combat cybercrime against women in India, not only drastic penal reforms are required, but there is also a great need for changes in the education system. Such a change cannot come from one section of society, rather the people, government, and NGOs, etc. must work together to bring about such a change. Women themselves must be empowered to take preventative measures, such as being careful when posting photos and videos of themselves and their loved ones online, being careful when communicating with strangers online, and protecting passwords and other important information that can compromise the security and woman's privacy. , Internet users in India should raise awareness of increasing privacy settings on social networking sites as a preventative measure. Therefore, there is an urgent need to sensitize and sensitize women to be careful while using internet facilities as well as proper guidance if they are faced with cybercrime in any way they may raise their voice against it. There is also an alarming need for knowledge and technological advances for the prevention of violence against women in India.

"Justice delayed is justice denied," & "Speedy Justice of our fundamental right" we've all heard & but practically doesn't happen in our nation we can get that if we analyze the current National Judicial Data Grid⁷, Law Commission of India 245 report⁸ & Chapter: - 37, Legal Judicial & Police Reforms, NITI AAYOG (Govt. of India), Strategy for New India @ 78, (November 2018) report⁹, we will find that a large number of cases are pending both in civil and courts of all levels in India which is posing a serious danger to the values of justice, equality, and good conscience in the eyes of litigants of our nation. The number of pending cases has become so excessive which is resulting in huge trouble for our adjudicating or judicial organizations officials or courts to provide efficient and speedy Justice to our litigants. Which is currently a very serious problem in our nation. In Chapter: - 37, Legal Judicial & Police Reforms, NITI AAYOG (Govt. of India), Strategy for New India @ 78, November 2018 it was stated that "To safeguard people's safety and security, as well as access to competent or efficient legal systems and speedy justice delivery system. According to the report, it will take approximately 20 years on average to settle a property dispute, and it would take 324 years to clear the existing backlog at the current pace of disposal. A key logistical and efficiency concern is the massive backlog of outstanding cases."¹⁰

Hence on the basis of In the above research, I would suggest our nation India is in urgent need of legal reforms to establish special courts to deal with the whole adjudication process of the offense especially related to cybercrimes in a very speedy manner & to provide speedy justice to the litigants because getting speedy trial is a fundamental right of our citizens.

REFERENCES & BIBLIOGRAPHY:-

1. i Dr. Mrs. K. Sita Manikyam, Cyber Crime – Law and Policy perspectives, 40 (Hind Law House, Pune, 2009). ii Cyber Crimes and the law, Legal India, legal news and law resource portal (Feb 26,2019,03:21 PM), available at <http://www.legalidia.com/cyber-crimes-and-the-law/>.

⁷ National Judicial Data Grid, <https://doj.gov.in/national-judicial-data-grid/>

⁸ https://lawcommissionofindia.nic.in/reports/report_no.245.pdf

⁹ https://www.niti.gov.in/sites/default/files/2019-01/Strategy_for_New_India_o.pdf

¹⁰ Chapter: - 37, Legal Judicial & Police Reforms, NITI AAYOG (Govt. of India), Strategy for New India @ 78, (November 2018), https://www.niti.gov.in/sites/default/files/2019-01/Strategy_for_New_India_o.pdf

2. iii Dhruvi M Kapadia ,Cyber Crimes Against Women And Laws In India , (Feb 26,2019, 04:43 PM) <https://www.livelaw.in/cyber-crimes-against-women-and-laws-in-india/>.
3. iv Id. at 6.
4. v Debarati Halder, Cyber Crime Against Women in India, (Feb 26,2019,08:12PM)
5. vi. www.cyberlawtimes.com/articles/103.html. vi Id. at 8.
6. vii Shobhna Jeet, Cyber crime against women in India: Information Technology Act, 2000 (Feb 28, 2019,06:43PM) www.elixipublishers.com.
7. viii Nishant Singh, Crime Against Women, 52 (Ancient Publication House, Delhi, 2014).
8. ix Id. at 53.
9. x Id. at 53.
10. xi Id. at 54.
11. xii Sobha Sexna, Crime against women 53, (Deep and Deep Publication, Delhi, 2014).
12. xiii Ms. Saumya Uma, Outlawing cyber Crimes Against Women in India, Bharti Law Review, April- June, 2017 (Feb 24,2019, 09:16 PM) <http://docs.manupatra.in>.
13. xiv Information Technology (Amendment) Act, 2008, No 10, (2009) § 66A.
14. xv Information Technology (Amendment) Act, 2008, No 10, (2009) § 66B.
15. xvi Information Technology (Amendment) Act, 2008, No 10, (2009) § 66C.
16. xvii Information Technology (Amendment) Act, 2008, No 10, (2009) § 66D.
17. xviii Information Technology (Amendment) Act, 2008, No 10, (2009) § 66E.
18. xix Information Technology (Amendment) Act, 2008, No 10, (2009) § 66F.
19. xx Information Technology (Amendment) Act, 2008, No 10, (2009) § 67.
20. xxi Information Technology (Amendment) Act, 2008, No 10, (2009) § 72.
21. xxii Indian Penal Code, 1860 § 354D.
22. xxiii INDIA CONST. art. 21.
23. xxiv The Hindustan Times, New Delhi dated 23 December 2003 (Feb. 29, 2019, 2: 23PM) www.ijert.org>papers>IJCRT1807078.
24. xxv Decided by Add. CMM, Egmore, Chennai on 5/11/2004 (Feb. 28, 2019, 9: 23PM) www.ijert.org>papers>IJCRT1807078
25. xxvi National Judicial Data Grid, <https://doj.gov.in/national-judicial-data-grid/>
26. xxvii https://lawcommissionofindia.nic.in/reports/report_no.245.pdf
27. xxviii https://www.niti.gov.in/sites/default/files/2019-01/Strategy_for_New_India_o.pdf
28. xxix Chapter: - 37, Legal Judicial & Police Reforms, NITI AAYOG (Govt. of India), Strategy for New India @ 78, (November 2018), https://www.niti.gov.in/sites/default/files/2019-01/Strategy_for_New_India_o.pdf.