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E-Mail:- blindfoldjournal@gmail.com

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DOWRY DEATH: AN ALARMING AND TRAGIC CRIME IN INDIA

Vidhi Saini, LLM Student (Criminology), School of Law, Lingaya's Vidyapeeth, Faridabad, Haryana

Dr. Anjali Dixit, Associate Professor, School of law, Lingaya's Vidyapeeth, Faridabad, Haryana

ABSTRACT

Dowry death is a tragic and prevalent form of gender-based violence that plagues South Asian societies, particularly India, Pakistan, Bangladesh, and Nepal. This abstract delves into the multifaceted aspects of dowry death, offering insights into its underlying causes, dire consequences, and the legal measures aimed at combating this heinous crime. Dowry death primarily occurs when a bride's family is unable to fulfill the exorbitant dowry demands of the groom's family, leading to harassment, emotional abuse, and physical violence against the newlywed woman. These incidents are deeply rooted in a complex web of societal norms, economic disparities, and deeply ingrained gender biases that perpetuate discrimination against women. The consequences of dowry death are profound and devastating. The ultimate price is often paid by the bride, who may lose her life, either through deliberate violence or by being compelled to take her own life due to the unrelenting torment she faces. Families of the victims bear emotional trauma, and the cycle of violence against women persists, causing a wider societal harm. Governments in affected countries have recognized the severity of the issue and enacted laws and regulations to address dowry-related violence. However, implementation and enforcement of these laws remain inconsistent and are often plagued by societal indifference and corruption. Dowry deaths are not just isolated incidents but symptoms of a broader problem that must be confronted head-on to secure the dignity and lives of women in South Asia.

KEY WORDS

Dowry Death, Societal Pressure, Emotional Trauma, Physical Violence, Heinous Crime

INTRODUCTION

In India, marriage is often seen as a sacred union, where a man and a woman come together as one, pledging to stay together for a lifetime. After the wedding, the bride traditionally leaves her parental home and her family to start a new life in her husband's home. This transition is marked by hope and anticipation, with the young bride dreaming of a loving and caring husband and supportive in-laws who will make her new home a comfortable and happy place. Leaving behind

the familiar surroundings of her childhood, she embarks on this new chapter in the expectation that her dreams of a happy and fulfilling life will come true.

Unfortunately, this ideal scenario doesn't always play out as planned. Sometimes, the fairy tale turns into a nightmare as some women face torment and humiliation at the hands of their husbands and in-laws. One significant reason for this abuse is the demand for dowry, which, in extreme cases, can even lead to the tragic death of the bride. This tragic social issue, where a married woman loses her life because her parents couldn't meet the unreasonable dowry demands of her in-laws, is known as "dowry death." It's worth noting that dowry deaths have been criminalized under the provisions of the Indian Penal Code (IPC).

The Dowry Prohibition Act of 1961 aimed to eradicate this practice, yet it persists due to various societal factors, including gender inequality, patriarchal norms, and the commodification of marriage. Despite legal measures and increased awareness, the menace of dowry deaths remains a significant challenge in India, necessitating comprehensive societal and legal reforms to protect the rights and safety of women.¹

HISTORICAL BACKGROUND

Dowry is not a recent issue in our society; it has deep historical roots in our cultural customs and practices. In ancient times, when parents married off their daughters, it was customary to give them generous gifts, including money, jewelry, and valuable items, as a way of expressing their love and affection.

The term "dowry" finds its origins in ancient Hindu customs like "Kanyadaan" and "Varadakshina," where gifts and cash were exchanged between families during weddings as a gesture of affection. Originally meant to be voluntary and symbolic, this tradition has drastically transformed over time. In contemporary legal terms, dowry encompasses property, money, or valuables given by the bride's family to the groom's, creating a grave issue when unfulfilled demands lead to a bride's death - termed as "dowry death." This crime stems from unbridled greed, disregarding the woman's well-being and emotions.

The 19th century witnessed a decline in women's status due to the proliferation of the dowry system, resulting in social and economic repercussions. In numerous cases, insufficient dowry led to the harassment and abuse of brides. Shockingly, India has the highest number of dowry-related

¹ "Dowry Deaths in India: A Reality Check." National Commission for Women.

deaths globally, highlighting the severity of this issue as per the Indian National Crime Record Bureau.

In the case of **Bhagwant Singh V. Commissioner of Police Delhi**², a woman died due to burn injuries, and her husband was accused. He claimed that she set herself on fire. The court rightly highlighted that a young woman, educated and with character, wouldn't resort to such extreme measures unless pushed to despair by intolerable suffering.

Similarly, in **Jaspal Singh V. State of Punjab**³, the prosecution revealed that the husband started demanding dowry right after marriage. When his demands weren't met, he killed his wife by strangling her and burning her body. The High Court rightfully sentenced him to life imprisonment.

These cases spotlight the tragic outcomes of dowry-related conflicts, emphasizing how women face grave harm when dowry demands are not met. The courts' decisions underscore the urgency to address these issues seriously and protect women from such atrocities.

POSITION IN INDIA

Despite the various laws and regulations aimed at curbing the practice of dowry, it remains a deeply entrenched custom in our society. Even though these laws are gender-neutral, most cases of dowry demands come from the groom's side. In some instances, the demands made by the groom's family are so excessive and persistent that the bride's family is unable to meet them. Tragically, this often leads to the bride being subjected to torture and humiliation in her marital home to pressure her parents and relatives into fulfilling these demands. When the demands still go unmet for any reason, the consequences can be horrifying, with the bride sometimes being burnt, beaten, or even forced to take her own life.

In the past, cases of married women's deaths were often dismissed as "suicides" or "accidents." It wasn't until 1975 that a women's rights organization in Hyderabad launched a campaign against dowry deaths. However, this effort was temporarily halted during a period of political emergency. The movement regained momentum once the emergency was lifted, and a new campaign started in Delhi by the Mahila Dakshata Samiti, addressing the violence inflicted on married women due to dowry demands and its role in pushing them towards tragic outcomes like self-immolation or suicide.

² 1983 AIR 826, 1983 SCR (3) 109

³ AIR 1979 SC 1708

Numerous similar movements emerged over time and gained strength. While some legislation was enacted to address the issue, it struggled to put an end to the problem. In a notable 1982 case, the Delhi Sessions Court handed down a positive judgment, convicting two individuals and sentencing them to death for their role in a dowry-related death. However, this judgment was later overturned by the Delhi High Court, but the Supreme Court upheld it, albeit converting the death sentence to life imprisonment. Subsequently, the Criminal Law (Second Amendment) was passed, making cruelty to a wife a non-bailable and cognizable offense, with a punishment of up to three years in prison, along with a fine for offenders. This amendment also revised Section 113A of the Evidence Act and Section 174 of the Criminal Procedure Code to treat dowry death and its abetment as more serious offenses.

Despite the efforts made by the government and the judiciary to combat dowry-related offenses and violence, these incidents continue to occur in our society. According to a report from the National Crime Record Bureau, India consistently records the highest number of dowry death cases each year.⁴

DOWRY PROHIBITION

The Dowry Prohibition Act of 1961 was put in place with the primary objective of preventing and penalizing any involvement in dowry-related practices. According to Section 3 of the Act, anyone who gives, takes, or assists in giving or taking dowry in any form can face imprisonment for a minimum of 5 years. In addition to imprisonment, the individual found guilty under this section will also be subject to a fine, which should be no less than Rs. 15,000 or the amount of dowry involved, whichever is higher. However, under certain special and well-documented circumstances, the court may impose a sentence of less than 5 years.

The Act doesn't just cover the actual exchange of dowry; it also penalizes anyone who demands dowry from the other party. Section 4 states that anyone who directly or indirectly demands dowry from the other party to the marriage, their relatives, or guardians can be sentenced to a term of imprisonment that can extend up to six months. In addition to imprisonment, a fine of up to Rs. 10,000 can also be imposed. The six-month imprisonment term can be reduced under specific circumstances, as long as the court provides written justification.

Furthermore, the Act forbids any advertising aimed at showcasing property with the intention of

⁴ Crime in India - National Crime Records Bureau, Ministry of Home Affairs, Government of India, 2021.

attracting marriage proposals and declares any agreement made for the exchange of dowry as null and void. The Act also establishes the position of a Dowry Prohibition Officer, responsible for overseeing matters related to the Act, ensuring its implementation, and upholding its provisions. The Dowry Prohibition Act stands as a crucial legal framework in India's efforts to combat dowry-related exploitation and violence, albeit requiring continual vigilance and reinforcement to achieve its intended objectives.⁵

LITREATURE REVIEW

1. **Critical Study of Dowry Death in India**⁶ by Shreya Seth, Seema Modi

This research paper delves into the shortcomings of a law established six decades ago to combat dowry, examining its failure to address the issue effectively. It highlights how victims often resort to ending their lives due to the severe torment inflicted by their in-laws over dowry demands. To combat this, it suggests the Indian government should prioritize empowering rural women through education, making them aware of the repercussions of agreeing to dowry demands during marriage, thereby advocating for more effective measures to tackle this societal problem.

2. **The Changing Paradigms of Dowry Death in India**⁷ by Purnima Shrama

This research paper speaks about Dowry, a form of social oppression, led to the enactment of stringent Anti-Dowry Laws. However, these laws are sometimes misused by some women to torment their husbands and families without evidence, causing emotional distress. This challenges the fundamental right to equality. Advocates for legal reforms against social issues like dowry should demonstrate community groundwork before demanding legislative changes. For instance, those advocating against dowry should gather support from their circles to enforce anti-dowry laws and report violations, fostering discussions for societal change. Encouraging daughters' education and independence is pivotal, offering them financial stability and respect. Ultimately, the best "dowry" parents can give their daughters is education and support for their chosen career path.

⁵ "Dowry Prohibition Act: An Overview." Legal Service India

⁶ Journal of Positive School Psychology 2022, Vol. 6, No. 4, 3134 – 3141

⁷ Indian Journal of Integrated Research in Law, Vol. 2 Issue 1 ISSN. 2583- 0583

3. **Women as Dowry Victims: A Legal Study**⁸ by Mrs. Deepa Muduli

This research paper sheds light on the persisting issue of the dowry system in India despite global efforts to curb violence against women. Dowry-related deaths are escalating, impacting all regions, castes, and communities. In today's materialistic society, marriages often revolve around financial gain, burdening brides while benefiting grooms. The pursuit of quick wealth fosters violent behavior towards women, resulting in a surge in crimes. Shockingly, many women endure murder, mutilation, or burning by their husbands or in-laws due to insufficient dowry. This harmful tradition persists, claiming lives and perpetuating violence against women under the pretext of dowry.

4. **Continued Shadow of Dowry**⁹ by Rafia Bano Baig , Altaf Rasool, Fayaz Ahmad Ambar, Imran AadilMalla

This research emphasizes that ending the dowry system requires more than just words and papers; the younger generation must actively work against this social evil. Empowering women through education and encouraging self-dependence is crucial. Women should boldly reject dowry seekers, and men should pledge against accepting or demanding dowry. However, eradicating dowry isn't easy, as even educated individuals support it. Education should enlighten rather than reinforce this practice. Nationwide efforts are essential, as public support is crucial for successful legislation. Ultimately, marriage shouldn't be about business but a sacred union. Ending dowry will uplift society towards progress and prosperity.

RESEARCH GAP

One significant limitation in this study is directly associated with the lack of access to real-time data concerning dowry deaths in the country. This limitation stems from a notable increase in unreported cases, making it challenging to obtain up-to-date information. The reliance on secondary sources for data collection has further exacerbated this issue, as current information, especially regarding unreported cases, is not readily available online. Consequently, this restricted access to current and comprehensive data has hindered the researcher's ability to draw precise

⁸ Volume-7, Issue-3, March-2018 • Print ISSN No 2277 - 8160

⁹ Journal of Critical Reviews ISSN- 2394-5125 Vol. 6, Issue 06, 2019 2904

conclusions and provide effective recommendations to address this pressing societal concern. Specifically, it has impeded the formulation of robust suggestions aimed at tackling this issue through the reinforcement of legislations like the "Dowry Death Act of 1961".¹⁰ Overcoming these data limitations is crucial to developing more targeted and impactful strategies to combat dowry-related fatalities and reinforce legal measures effectively.

RESEARCH OBJECTIVE

The research objectives for studying dowry deaths are crucial in shedding light on this deeply ingrained issue and working towards its prevention and eradication. Here's what we aim to achieve:

1. Investigating why dowry laws haven't successfully gotten rid of the dowry system in our society.
2. Checking how effective the Dowry Prohibition Act of 1961 has been and understanding the impact it has made through our legal system.
3. Exploring why women might feel reluctant or hesitant to report instances of violence related to dowry.
4. Drawing conclusions from our findings and suggesting ways to completely eliminate the heartbreaking issue of dowry-related deaths.

By pursuing these research objectives, we can gain valuable insights into the complexities of dowry deaths and work towards preventing such tragedies, promoting gender equality, and creating safer communities for all.

RESEARCH METHODOLOGY

The research approach used to conduct this research includes both quantitative and qualitative data. It drew inspiration from different books such as the Indian Penal Code, the Code of Criminal Procedure, the Indian Constitution, and other legal perspectives.

The data has been thoroughly examined. All pieces of data, digital or otherwise, have been cited. This research seeks to validate the idea by first-hand examination of authorized sources. The data for this study was gathered from both primary and secondary sources. Primary data was gathered through legislative acts, judicial judgments, presidential decrees and directives, and rules and regulations of various administrative authorities.

¹⁰ The Dowry Death Act of 1961 is a significant legislation aimed at addressing dowry-related deaths in India.

Secondary data sources include books, law journals, magazines, articles, websites, research papers, newspapers, and so on.

ANALYSIS AND DISCUSSION

Dowry death is a tragic and alarming issue that continues to persist in many societies. It refers to the death of a woman caused by disputes or harassment related to dowry payments. Dowry is a traditional practice where the bride's family provides gifts, money, or property to the groom's family during marriage. These deaths occur when the demands for dowry are not met, leading to physical, emotional, or mental abuse of the bride. In extreme cases, it can result in the bride's death, often disguised as accidents or suicides. Dowry deaths are a violation of human rights and a reflection of gender inequality and discrimination.

The analysis and discussion on dowry deaths focus on understanding the root causes, raising awareness, and advocating for legal and social reforms. It involves examining the cultural, economic, and societal factors that contribute to this practice and its consequences. It also includes discussing the role of education, empowerment, and changing social norms in addressing dowry-related violence.

Efforts to combat dowry deaths involve implementing and enforcing stricter laws against dowry harassment, providing support and protection for victims, and promoting gender equality. It requires a collective effort from individuals, communities, and governments to challenge and eradicate this harmful practice.

PROVISIONS UNDER IPC

Indian Penal Code under Section 304 B defines the offence of dowry death and makes provision to punish any offender thereby. This section is not gender neutral and operates under a presumption that it is always a woman who is the victim of dowry demands and is forced to die by the hands of her husband or/and her in laws for not fulfilling their never ending unreasonable demands for dowry.

Section 304 B states that any woman who dies under unnatural circumstances either by burn injuries or any other bodily injury within seven years of her marriage and where there had been continuing demand for dowry soon before her marriage because of which she was subjected to violence or cruelty by her husband and/or her in laws shall be considered to have been a victim of dowry death and her husband and other relatives shall be considered to have caused her death.

Under Section 304B of the Indian Penal Code, certain essential elements must be proven in cases of dowry death:

1. The death of a married woman should result from burning, bodily injury, or any other unnatural circumstances.
2. The death must occur within seven years of her marriage.
3. It must be established that shortly before her death, the woman was subjected to cruelty and harassment by her husband and/or his other relatives.
4. This cruelty and harassment should be connected to the demand for dowry.

The section also clarifies that the definition of 'dowry' in this context is based on the Dowry Prohibition Act of 1961. This means that dowry encompasses any property, valuable security, or gifts that are given or agreed to be given either directly or indirectly as a condition of marriage.

The intention behind this law is to provide legal protection to married women who may be victimized due to dowry-related demands, emphasizing the importance of prosecuting those responsible for such acts. It's a vital legal framework aimed at addressing and preventing the tragic consequences of dowry-related violence in India.

This section makes a presumption that under the circumstances stated above it will be presumed that such death of married woman was dowry death and was caused by her husband and/or his relatives. Therefore, the husband and/or his relatives shall be punished with imprisonment of a term which shall not be less than seven years but may extended up to life imprisonment

“Soon Before Death” In the legal realm, the interpretation of certain phrases and concepts can often be a complex and crucial matter. One such phrase that has seen multiple attempts to define its scope is "soon before death." The courts have grappled with this issue in various cases, and one notable case where it was discussed is **Hiralal v. State (Government of NCT) Delhi**.¹¹

In this case, a tragic incident occurred where a young girl took her own life by consuming poison. Her grieving parents pointed fingers at her husband and father-in-law, alleging that their cruel and harassing behavior led her to this tragic decision. The court, in its judgment, sided with the girl's family and delved into the intricacies of the phrase "soon before death." The court wisely recognized that attempting to establish a rigid, one-size-fits-all formula for defining "soon before

¹¹ Appeal (crl.) 825 of 2002

death" would undermine the essence of the relevant legal section. Therefore, the court ruled that "soon before death" should be interpreted as any reasonable time period that is sufficient to establish a connection between the cruelty suffered by the girl and her untimely demise.

In essence, the court emphasized that the cruelty inflicted upon the girl must be a direct cause of her death. If there exists a significant time gap between the acts of cruelty and the girl's decision to commit suicide, and her mental state at the time of suicide cannot be reasonably linked to such cruelty, then the application of this legal section can be invalidated.

The landmark case of **Kamesh Panjiyar v. State of Bihar**¹² sheds light on the interpretation of the term "soon" within this legal section. This case involved a dowry-related death where the husband and his family demanded a she-buffalo as additional dowry. When their demand wasn't met, they mistreated the deceased wife. Later, the wife was found dead with a neck injury. The session court ruled it as a dowry death, sentencing the husband to 10 years in prison. The Supreme Court upheld this decision, stating that proving cruelty inflicted on the woman shortly before her death is sufficient to establish a dowry-related death under Section 304B. The punishment imposed by the session judge was deemed appropriate by the Supreme Court.

The importance of what is known as the "proximity test" in such cases was further emphasized in the **Kaliyaperumal v. State of Tamil Nadu**.¹³ The court stated that the determination of what constitutes a "reasonable time" will depend on the unique circumstances of each case. The sole purpose of this phrase is to establish a close and direct relationship between the acts of cruelty and the girl's tragic demise.

PROVISIONS UNDER EVIDENCE ACT

Section 113B of the Indian Evidence Act complements Section 304B of the IPC. It introduces a legal presumption that the husband and his relatives are presumed to have caused the woman's death under these specific circumstances. In other words, if it can be established that the woman died due to cruelty or harassment for dowry, this legal provision creates a presumption that the husband and his family members are responsible for her death.

¹² Appeal (crl.) 205 of 2005

¹³ Appeal (crl.) 1358 of 2002

In the case of **State of Punjab v. Iqbal Singh**¹⁴, the Supreme Court acknowledged the private nature of acts related to dowry demand, cruelty, violence, and humiliation within a household. Due to the difficulty of obtaining direct evidence in such situations, Section 113B of the Indian Evidence Act becomes crucial. This legal provision allows for the presumption of guilt if some basic facts are established. The seven-year timeframe is intended to reflect the idea that if no incidents occur during this period, it suggests that the couple has likely resolved their differences, making later events less likely. This legal framework aims to address and prevent dowry-related crimes while ensuring fairness and justice.

PROVISIONS UNDER CrPC

The Criminal Procedure Code (CrPC) has specific provisions to deal with cases involving suicides or deaths under suspicious or unnatural circumstances. Section 174 of the CrPC mandates that the police conduct an inquiry in such cases, which includes situations like the death of a woman within seven years of her marriage under suspicious circumstances.

Moreover, Section 176 allows for a further investigation if the magistrate deems the police inquiry insufficient. In this case, the magistrate can personally conduct an inquiry or appoint someone else to do so on their behalf. These legal provisions are in place to ensure a thorough investigation into cases of suspicious or unnatural deaths, especially those related to women within the first seven years of their marriage.

RESEARCH FINDINGS

Research findings on dowry deaths highlight several important aspects. Studies have shown that dowry deaths are often associated with deeply rooted patriarchal norms and gender inequalities. They reveal that dowry demands and disputes can escalate into violence, leading to severe consequences, including the loss of lives.

Research also sheds light on the socioeconomic factors that contribute to dowry deaths. It has been found that dowry-related violence is more prevalent in communities with lower levels of education and economic development. Poverty and financial pressures can exacerbate dowry demands and

¹⁴ AIR 1991 S.C. 1532

increase the risk of violence.

Furthermore, research emphasizes the role of social and cultural factors in perpetuating this practice. Norms and traditions that place a higher value on men and consider women as burdens can perpetuate the dowry system. Studies also highlight the influence of marital dynamics, family pressures, and societal expectations in shaping dowry-related violence.

Efforts to address dowry deaths require a comprehensive understanding of these research findings. They inform the development of interventions and policies aimed at preventing dowry-related violence, promoting gender equality, and empowering women. Research findings can also guide awareness campaigns, educational programs, and legal reforms to address the underlying causes and consequences of dowry deaths.

CONCLUSION

Dowry death remains a distressing and prevalent crime in India, marking a distressing trend of gender-based violence and tragic loss of women's lives. Despite legal measures and increased awareness, this deeply embedded issue persists, leading to the premature deaths of brides due to dowry-related conflicts. It's not solely a legal dilemma but a societal challenge, entwined with cultural norms and economic pressures. Addressing this menace demands a multifaceted approach: stringent law enforcement, educational campaigns fostering gender equality, economic empowerment initiatives for women, and a cultural shift away from viewing marriage as a transaction. Eradicating dowry deaths necessitates united efforts and a steadfast commitment to safeguarding women's dignity and rights in Indian society, striving for a future where every woman lives free from the threat of this tragic and preventable crime.

As we conclude this research, it is clear that the elimination of dowry deaths is a complex and ongoing journey that requires the collaborative efforts of governments, civil society, and individuals. Recognizing the complexities and sensitivities surrounding this issue, we hope this research serves as a catalyst for further studies, policy enhancements, and collective endeavors to safeguard the lives and dignity of those affected by this tragic practice. Dowry deaths represent a significant violation of human rights and a pressing public health concern, making it imperative that we continue to address and seek solutions for this deeply entrenched problem.

SCOPE FOR FUTURE RESEARCH

Despite multiple attempts to criminalize dowry-related offenses, the number of such cases remains high. To address this issue, we need to consider revising laws and the government's approach. Here are some suggestions:

1. **Spreading Awareness:** One crucial aspect is that many women are still unaware of their rights and endure unjust treatment from their in-laws. Initiatives should be taken to educate women about their rights and let them know that they need not suffer in any circumstance.
2. **Educating People:** It's essential for society to realize that giving and taking dowry does not enhance one's prestige but is frowned upon by educated individuals. Educating people about this can help discourage this practice.
3. **Strict Laws and Speedy:** Trials Laws related to such offenses should be made more stringent, and these cases should be handled through speedy trials to ensure swift justice.
4. **Enforcement Mechanism:** The enforcement of these cases should be strengthened, and any incident involving the exchange or demand of dowry should be actionable suo motu (on its own initiative). Encouraging people to report such incidents, with the assurance of anonymity, is vital in curbing this practice.

LIMITATIONS

Several limitations impede effective resolution of dowry deaths in India. Firstly, underreporting due to social stigma and familial pressures obscures the actual magnitude of the issue. Flaws in law enforcement and judicial processes lead to delays and inadequacies in delivering justice. In some cases, lack of concrete evidence or witnesses hampers legal proceedings, allowing perpetrators to evade punishment. Socio-cultural norms perpetuate the dowry system, making it deeply ingrained in societal expectations despite legal prohibitions. Economic disparities and financial dependence of women contribute to their vulnerability, compelling them to endure or succumb to dowry-related abuse. Additionally, insufficient awareness programs and educational initiatives fail to address the root causes or change societal perceptions effectively. Tackling dowry deaths demands a comprehensive approach addressing legal, cultural, economic, and educational facets to effectively combat this tragic and systemic issue. It can include the lack of accurate reporting, societal stigma, and the complexity of the issue. Researchers must navigate these challenges to gain a deeper understanding of this pressing social problem.

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