

Honour Killing In India

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Abstract

Honour killing amounts to homicide and murder because the acts are done with the intention of murdering the victims as they have purportedly brought dishonor upon the family. The perpetrators can be punished as per Section 302 of the IPC. Every person has a right to live. The capital punishment is possible only when granted by law. In cases where the khap panchayats have compellingly separated married couples who are of eligible age to get married, these have violated the provisions under the Indian Constitution. The provisions of CEDAW can be used to argue that the tradition and practice of punishing individuals for ill-informed ideas of dishonoring the family, is essentially institutionalized discrimination against individuals and creates a legally binding obligation for India, as a State party to the convention, to take all measures to end all forms of the practice of honour killing and ensure that all discrimination against women in matters relating to marriage and family relations are eliminated, providing them with the equal right to enter into marriage and to freely choose a spouse and to enter into marriage with their free and full consent as enumerated in Article 16 of the Indian Constitution. The Law Commission has recommended that honour killings be made a non-bailable offence and advocated a seven-year jail term for caste panchayat members found guilty of persecuting legally married couples in the name of honour.

Keywords: Honour, Right, Crime.

Introduction

Honour Killing has been regarded as a complex issue, which has been widely misunderstood for many countries. The concept of Honour Killing is elastic which change according to time, place and forms of articulation and expression in society. Honour Killing have been defined as patterns of conduct cutting across Communities, cultures, religions and nations and manifested in a range of forms of violence directed in the majority of cases, against women including murder (Honour Killing) and forced marriages, Honour Killing is considered to be a crime that threatens the unity and harmony of the community and it acts as a brief preventing women from progressing in their lives. Honour Killing and

punishment have been documented over centuries among a wide variety of ethnic and religious groups throughout the world.

Honour Killing as a death that is awarded to a women of the family for marrying against the parents' wishes, having extra-marital and pre-marital relationship marrying within the same gotra or outside one's caste or marrying a cousin from different caste. Honour Killing is different from the dowry death that are also very common practice in India as, in the case of dowry death, perpetrations of that action claim that they have not been given enough material rewards for accepting the women into the family. In that case noted that the wife commits suicide rather than being killed, it has to be said that she has been mentally killed, it not physically we have had a tradition of Honour Killing. This tradition was first viewed in its most horrible from during the partition of the country in between the year 1947 and 1950, when many women were forcefully kill, so that family honour could be preserved.

During the partition there were a lot of forced marriages, which were causing women from India to marry men from Pakistan and vice-versa. And then, there was a search to hunt down these women who were forced to marry a person from another country and another religion and when they returned home, they were killed so that the family honour could be preserved and they were not declared social outcasts from their religion. At that time, the influence of religion and social control was much greater and hence, there were at least a couple of honour killing a day if not more. The partition year can be seen to the beginning of the tradition of honour killing on a large scale. It's worth mentioning here that honour killing is not specifically related to India only. An honor killing or honour killing (also called a customary killing) is the murder of a member of a family or social group by other members, due to the belief of the perpetrators (and potentially the wider

community) that the victim has brought dishonor upon the family or community. Honour killings are directed mostly against women and girls. The perceived dishonor is normally the result of one of the following behaviors, or the suspicion of such behaviors:

- a. Dressing in a manner unacceptable to the family or community,
- b. Wanting to terminate or prevent an arranged marriage or desiring to marry by own choice,
- c. Engaging in heterosexual sexual acts outside marriage, or even due to a non-sexual relationship perceived as inappropriate, and
- d. Engaging in homosexual acts. Women and girls are killed at a much higher rate than men.

Constitution Provisions

The Constitution of India has ample provisions allowing an individual to exercise his/her choice independent of caste, religion or gender and protection from honour related crimes including honour killings. Following are those Constitutional provisions that substantiate this: Honour Killings are cases of homicide and murder which are grave crimes under the Indian Penal Code (IPC). Section 299 and 301 of the IPC, deals with culpable homicide not amounting to murder while Section 300, deals with murder. Honour killing amounts to homicide and murder because the acts are done with the intention of murdering the victims as they have purportedly brought dishonor upon the family. The perpetrators can be punished as per Section 302 of the IPC. The khap panchayats or family members can also be booked under Section 302 of IPC for instigating suicide those who transgress the so called norms of the community. Such killings also violates Articles 14, 15 (1) & (3), 17, 18, 19 and 21 of the Constitution of India. Article 14 of the Indian Constitution guarantees to every person the right to equality before the law or the equal protection of the laws. Every person, whatever is his or her status or situation is subject to the jurisdiction of the ordinary courts. This right to equality is thus documented as one of the fundamental features of the Indian Constitution. Honour Killings are thus hideously against this very Constitutional Right provided for the protection of Indian citizens. Honour killings are mainly directed towards women and thus give rise to

gender violence Honour killings involve the murder of a particular person especially a woman and thus come under the ambit of Section 299 and Section 300 of the Indian Penal Code. It is also violation of Article 19 and Article 21 of the Constitution. Such brutal murders, under the garb of saving the honour of the family, are clearly against the Constitutional provisions enshrined in Article 21. Khap panchayats violate a person's fundamental right to life as they kill or instigate murder, in the name of honour. Every person has a right to live. The capital punishment is possible only when granted by law. In cases where the khap panchayats have compellingly separated married couples who are of eligible age to get married, these have violated the provisions under the Indian Constitution.

The Indian Majority Act, Section-3, 1857 states that every person domiciled in India shall attain the age of majority on completion of 18 years and not before. Unless a particular personal law specifies otherwise, every person domiciled in India is deemed to have attained majority upon completion of 18 years of age. However, in the case of a minor for whose person or property, or both, a guardian has been appointed or declared by any court of justice before the age of 18 years, and in case of every minor the superintendence of whose property has been alleged by the Court of Wards, age of majority will be 21 years and not 18.

The Act is relevant in cases where the khap panchayats have forcefully separated married couples who are of eligible age to get married. It is a violation of the provisions under this Act. The main reason behind the enactment of the Special Marriage Act, 1954 was to provide a special form of marriage for the people of India and all Indians residing in foreign countries, irrespective of the religion or faith followed by either party, to perform the intended marriage. Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 was enacted by the Parliament of India, in order to avert atrocities against Scheduled Castes and Scheduled Tribes. The intention of the Act was to help the social inclusion of Dalits into Indian society. It defines acts such as forcing an SC/ST to eat or drink any inedible or obnoxious substance, removing clothes, parading naked or with painted face or body, assaulting, dishonoring and outraging the modesty of an SC/ST woman, sexual exploitation of an SC/ST woman, forcing an SC/ST to leave his or her house or village as punishable. The Act is linked to honour killings because numerous incidents of honour killing are in

relation to caste and religion. The Protection of Human Rights (Amendment) Act, 2006 makes the provision for protection of individual rights of human beings and the constitution of a National Human Rights Commission, State Human Rights Commission and Human Rights Courts for better protection of human rights of individuals. The Protection of Women from Domestic Violence Act, 2005 provides for more effective protection of the rights of women guaranteed under the Constitution who are victims of violence of any kind occurring within the family and for matters connected therewith or incidental thereto. For the purposes of this Act, any act, omission or commission or conduct of the respondent shall constitute domestic violence in case it – (a) Harms or injures or endangers the health, safety, life, limb or well-being, whether mental or physical, of the aggrieved person or tends to do so and includes causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse; or (b) harasses, harms, injures or endangers the aggrieved person with a view to coerce her or any other person related to her to meet any unlawful demand for any dowry or other property or valuable security; or (c) has the effect of threatening the aggrieved person or any person related to her by any conduct mentioned in clause (a) or clause (b); or (d) otherwise injures or causes harm, whether physical or mental, to the aggrieved person. The Indian Evidence Act, 1872 makes provision to punish those who conceal facts, either before or at the time of, or after the alleged crime. Article 13 of the Act: Facts relevant when right or custom is in question - Where the question is as to existence of any right or custom, the following facts are relevant: (a) Any transaction by which the right or custom in question was created, claimed modified, recognized, asserted or denied, or which was inconsistent with its existence; (b) Particular instances in which the right or custom was claimed, recognized, or exercised, or in which its exercise was disputed, asserted, or departed from. The Act is relevant to bring to justice those who become victim because of the verdicts issued by the khap panchayats.

International Provisions

India is a signatory to the United Nations Convention on the Elimination of all forms of Discrimination against Women (CEDAW 1979) and has also ratified the convention. The provisions of CEDAW can be used to argue that the tradition and practice of

punishing individuals for ill-informed ideas of dishonoring the family, is essentially institutionalized discrimination against individuals and creates a legally binding obligation for India, as a State party to the convention, to take all measures to end all forms of the practice of honour killing and ensure that all discrimination against women in matters relating to marriage and family relations are eliminated, providing them with the equal right to enter into marriage and to freely choose a spouse and to enter into marriage with their free and full consent as enumerated in Article 16 of the Indian Constitution. This means ensuring that informal decision making bodies functioning on customary laws, such as khap panchayats, are refrained from enforcing their dictates, and intrusive with the right of individuals to choose their spouse. Noting that the Universal Declaration of Human Rights, (UDHR 1948) affirms the principle of the inadmissibility of discrimination and inequity and proclaims that all individuals are born free and equal in dignity and rights and freedom set forth therein, devoid of distinction of any kind including distinction based on sex. Recalling that prejudice and discrimination against women violates the principle of equality of rights and respect of human dignity, is an obstacle to the participation of women in the political, social economic and cultural life and hampers the growth and prosperity of society and the family. All crimes of honour, including honour killing, are gross violations of the rights enumerated in the declaration. Article 1 and 2 of the declaration state that “all human beings are born free and equal in dignity and rights,” and that “everyone is entitled to all the rights and freedoms set forth in” the declaration irrespective of “sex”. Therefore as enumerated in the declaration’s Articles 3 and 5, women are entitled to enjoy the “right to life, liberty and security of person” and also the “right to be free from torture or cruel, inhuman and or degrading treatment”. Crimes of honour violate Article 3 and 5 when the purpose of the perpetrator is to inflict severe mental and physical pain on the women. Under Article 12 of the International Convention on Economic, Social and Cultural Rights (ICESCR 1976) State parties have to take all steps to ensure the “right of everyone to the enjoyment of the highest attainable standard of physical and mental health”, is ensured. Crimes of honour that involve sexual violence and mental violence or physical or mental torture obstruct the right of women to enjoy the highest attainable standard of health. India, as a State party, is therefore legally obligated to ensure that individuals and

victims of crimes of honour are able to avail this right. While not legally binding on the State, the human rights standards enumerated in paragraph 232 of the Beijing Platform for Action (BPFA 1995) recognizes that the “human rights of women include their right to have control over and decide freely and responsibly on matters relating to their sexuality, including sexual and reproductive health, free of coercion, discrimination and violence”. The Beijing Platform for Action on Women’s Human Rights calls upon States to “take urgent action to combat and eliminate violence against women, which is a human rights violation resulting from harmful traditional or customary practices, cultural prejudices and extremism”. Crimes of honour may involve the violation or abuse of a number of human rights, which include the right to life, liberty and security of the person; the prohibition on torture or other cruel, inhuman, or humiliating treatment or punishment; the ban on slavery; the right to freedom from gender-based discrimination; the right to privacy; the right to marry; the right to be free from sexual abuse and exploitation; the obligation to amend customs that discriminate against women; and the right to an effective remedy. All these mentioned above violate the Human Rights Act (1998). Honour Killings are a clear violation of human rights and States necessarily need to protect individuals from such violations. Two major UN documents call for the „elimination“ of honour killing. The concept of elimination appears in the Declaration on the Elimination of Violence against Women” (1993) and in „Working towards the Elimination of Crimes against Women Committed in the Name of Honour“ (2003). But the eradication of any such phenomenon like honour killing requires a serious intervention in the status quo. Equal gender relations have not yet been achieved and violence still exists in the name of honour. The whole system in itself is patriarchal and insensitive. In the words of the UN Declaration on the Elimination of Violence against Women: “Violence against women is a manifestation of historically unequal power relations between men and women, which have led to discrimination over and discrimination against women by men and to the prevention of the full advancement of women, and that violence against women is one of the crucial social mechanisms by which women are forced into a subordinate position compared with men.” However constitutional law and international provisions fail to tackle with this menace. It also fails to give justification as to why such a crime is rampant even in the contemporary times when there are abundant provisions for the

protection of individuals. It is strange that even after the provisions of CEDAW and various human rights provisions to eliminate violence against women; individuals continue to be the victims of murders in the name of honour.¹

Bill against Honour Killings

A spate of murders and dishonorable crimes in the name of ‘honour’ whether of a family or caste or community have been reported in the recent past and are continuing to be reported. Though most of these killings and crimes are being reported from the States of Punjab and Haryana, Delhi, Western U.P and other parts of Northern and Western India, the problem is not confined to these areas alone and almost every part of the country has been witness to such incidents. A crime in the name of ‘honour’ is one of a range of violent or abusive acts including emotional, physical, and sexual abuse and other coercive acts. In each of these cases, the family of the girl who has chosen to exercise her choice to marry is implicated. The family, sometimes alone, and often in association with other relatives/friends, and/or a certain body of persons like the ‘caste’ or ‘khap’ or community based panchayats, is instrumental in committing these killings and crimes. On certain occasions, the main perpetrator of these crimes and killings are the ‘caste’ or ‘khap’ or community panchayats. These panchayats or associations, through various kinds of coercive and punitive actions, want to create terror and stop marriages and associations on the basis of choice from taking place. However, these actions in the name of ‘honour’ are due to a variety of self seeking reasons but are commonly justified on the basis of custom and tradition. These actions are also violative of certain fundamental rights in the Constitution of India, including the right to life, and liberty which includes the right to bodily integrity, and the right to choose whom to associate with. The actions of the parents of the girls to stop her from exercising her choice also result in curtailment of her freedom to movement and expression. A valid consent to a Marriage is also an essential prerequisite under the law. However, no laws which punish crimes in the name of Honour exist in India. There are also no laws which punish the illegal and often barbaric actions of the Khap or community panchayats or other caste or religious associations. Some offences under the Indian Penal Code, 1860 are invoked to sometimes book offenders in these cases but these offences do not cover the entire gamut of

illegal actions perpetrated in the name of Honour or prescribe adequate punishment for these barbaric acts.²

Judiciary on Honour Killing: Bhagwan Das Honour Killing Case– Supreme Court Judgement

Before parting with this case we would like to state that 'honour' killings have become commonplace in many parts of the country, particularly in Haryana, western U.P., and Rajasthan. Often young couples who fall in love have to seek shelter in the police lines or protection homes, to avoid the wrath of kangaroo courts. We have held in Lata Singh's case (supra) that there is nothing 'honourable' in 'honour' killings, and they are nothing but barbaric and brutal murders by bigoted, persons with feudal minds. In our opinion honour killings, for whatever reason, come within the category of rarest of rare cases deserving death punishment. It is time to stamp out these barbaric, feudal practices which are a slur on our nation. This is necessary as a deterrent for such outrageous, uncivilized behaviour. All persons who are planning to perpetrate 'honour' killings should know that the gallows await them.

Law Panel for Making Honour Killings Non-Bailable Offence

The Law Commission has recommended that honour killings be made a non-bailable offence and advocated a seven-year jail term for caste panchayat members found guilty of persecuting legally married couples in the name of honour.

In its latest report, the Commission headed by Justice P V Reddi also asked the government to explore the possibility of a new law to prohibit unlawful caste assemblies which take decisions to condemn marriages not prohibited by law.

"No person or any group shall assemble to condemn any marriage not prohibited by law, on the basis that it dishonored the caste or community," the report stated.

"These offending acts imperiling the liberty of young person's marrying or intending to marry according to their wishes are being perpetrated in certain parts of the country and need to be effectively checked,"

Justice Reddi wrote to Law Minister Salman Khurshid in the report before he demitted office recently.

The Commission, however, has rejected the government's suggestion of defining honour killing as a specific offence in the Indian Penal Code (Section 300), stating that the existing provisions were sufficient.

It has also turned down the government's view that onus of proving innocence in honour killings cases must be shifted on the accused.

Justifying the need for a separate law to deal with unlawful assemblies which lead to honour killings, the panel has pointed out that the existing criminal law lacks direct application to illegal acts of such assemblies.

"The caste councils or panchayats popularly called 'khaps' try to adopt the chosen course of moral vigilantism and this needs to be immediately checked," the Commission stated.

The new law proposed by the Commission has defined three separate offences, with a maximum jail term of seven years for those found guilty of criminally intimidating married couples.

It has disagreed with the Supreme Court's suggestion that death sentence be applied to all honour killing cases.

"With great respect, we are constrained to say that such a blanket direction given by the Supreme Court making death sentence a rule in 'honour killings' cases, makes a departure from the principles firmly entrenched in our criminal jurisprudence by virtue of a series of decisions rendered by larger Benches of Supreme Court," the Commission said.

It said that it is settled law that aggravating and mitigating circumstances should be weighed and it is only in very exceptional and rare cases, death sentence should be imposed.

"Death sentence, in other words, is a last resort. Further, where there is more than one accused, the degree of participation and culpability may vary," it added.³

Manoj Babli Murder Case

The Manoj-Babli honour killing case⁴ was the honour killing of Indian newlyweds Manoj Banwala and Babli in June 2007 and the successive court case which historically convicted defendants for an honour killing. The killing was ordered by a khap panchayat (khap), a religious caste-based council among Jatts, in their Karora village in Kaithal district, Haryana.

The khap passed a decree prohibiting marriage against societal norms. Such caste-based councils are common in the inner regions of several Indian states, including Haryana, Punjab, western Uttar Pradesh, and parts of Rajasthan, and have been operating with government approval for years. In any event, the state government expressed no concern about the ruling of the khap panchayat.

The Khap panchayat's ruling was based on the assumption that Manoj and Babli belonged to the Banwala gotra, a Jat community, and were therefore considered to be siblings despite not being directly related and any union between them would be invalid and incestuous. Nevertheless the couple went ahead with their marriage, following which they were abducted and killed by Babli's relatives.

In March 2010 a Karnal district court sentenced the five perpetrators to be executed, the first time an Indian court had done so in an honour killing case. The khap head who ordered but did not take part in the killings received a life sentence, and the driver involved in the abduction a seven-year prison term. According to Home Minister P. Chidambaram, the UPA-led central government was to propose an amendment to the Indian Penal Code (IPC) in response to the deaths of Manoj and Babli, making honour killings a "distinct offense".

Background

Manoj's and Babli's families lived in Karoran Village, Kaithal. Manoj's mother, Chanderpatti Berwal, had four children, of which Manoj was the eldest.^{[1][7]} Chanderpatti was widowed at the age of 37, when Manoj was only 9. Manoj owned an electronics repair shop at Kaithal and was the only member of his family receiving income.^{[1][5]} Manoj's cousin, Narender, lived with the family and worked in Panchkula.

Babli's mother, Ompati, also had four children, including eldest son, Suresh, and Babli. Like Manoj, Suresh was the only earning member of the family.^[11] Babli was still studying in school. Ompati is a widow.

Court Appearance

After the trial, Manoj and Babli, accompanied by a team of five police officers assigned to them for protection, left for Chandigarh. The police left them at Pipli and slipped away. Suspecting foul play, Manoj and Babli did not continue toward Chandigarh, instead boarding a bus for Karnal. According to a statement filed by Chanderpatti, later that day, around 3:40 pm, she received a call from a Pipli telephone booth from Manoj, who said that the police had deserted them, and Babli's family members were trailing them, so they would try to take a bus to Delhi and call her back later. Babli asked for acceptance from Chanderpatti, who replied affirmatively. That was the last time Manoj's family heard from the couple.

On 20 June, Chanderpatti's complaint regarding the kidnapping was filed as an FIR at the Bhutana police station following media pressure on the police.

Kidnapping and Murder

The couple's bus left for Delhi, but en route at 4:30 pm, Babli's relatives stopped the bus near Raipur Jatan village, about 20 kilometres (12 mi) from Pipli. They kidnapped the couple in a Scorpio SUV driven by Mandeep Singh.^[23] Kuldip Thekedar, a road contractor, witnessed the kidnapping and filed a complaint at the Butana police station in Karnal district, giving the licence plate number of the Scorpio. Later, Chanderpatti ascribed the murder to the unauthorised withdrawal of the couple's security team ignoring the orders given by the district and sessions judge (DSJ) of Kaithal. Upon receiving no further news, Chanderpatti's nephew, Narendra Singh traced the contractor, and after he was shown a photo of the couple, the contractor recognised the couple. The family then understood that Manoj and Babli were the victims of the kidnapping.

After the kidnapping, the couple was beaten. Babli's brother Suresh forced her to consume pesticide, while

four other family members pushed Manoj to the ground, her uncle Rajinder pulling a noose around Manoj's neck and strangling him in front of Babli. They wrapped the bodies in gunny sacks and dumped them in Barwala Link Canal in Hisar district. On 23 June, nine days later, their mutilated bodies, hands and feet tied, were fished out of the canal by Kheri Chowki police. After autopsy, police preserved Manoj's shirt and Babli's anklet and cremated the bodies as unclaimed on 24 June. On 1 July the family identified them by the remnants of their clothing. The accused were subsequently arrested.

Police discovered a number of articles in the Scorpio used to kidnap the couple—parts of Babli's anklet, two buttons from Manoj's shirt, and torn photographs of the couple. Manoj's purse was found on one of the accused.

Court Judgment

No Karnal lawyer would adopt the case, so Manoj's family had to find lawyers from Hisar. Later on Adv. Sunil Rana from Karnal accepted the case, arguing on their behalf public Sunil Rana and lawyers Lal Bahadur, Surat Singh, Cornel Omparkash, and Rakesh Manjhu from Hisar, Haryana. Bahadur argued that the couples' clothes recovered from the canal and photographs from the Scorpio established that day's happenings. Bahadur also cited the contractor's statement and the last phone call from Manoj, in which Manoj had related that Babli's relatives were trailing them. However, the contractor "turned hostile" and withdrew his statement.

Arguing for the defence was lawyer Jagmal Singh. He asserted that there was no evidence against the accused and that it was all contrived by the media, no evidence that the khap panchayat ever met to discuss the fate of the couple, and no evidence indicating that Manoj and Babli were dead. The cremated bodies recovered from the canal were never confirmed to be those of Manoj and Babli.

On 29 March 2010, after 33 months of 50 hearings with 41 witnesses, the Karnal District court found the accused guilty of murder, kidnapping, conspiracy, and destroying evidence under respective sections in the IPC. The next day, 30 March, for the first time in Haryana state history, a death penalty verdict was announced in the double murder case for the five accused. All were related to Babli, and

included her brother Suresh, cousins Gurdev and Satish, paternal uncle Rajender, and maternal uncle Baru Ram. The leader of the khap panchayat Ganga Raj (52), was given a life sentence for conspiracy, while the driver, Mandeep Singh, held guilty of kidnapping, was given a jail term of seven years. The court asked the Haryana government to provide a compensation of Rs 100,000 to Chanderpati, who had filed the case. Ganga Raj was fined Rs 16,000, and the other six convicts Rs 6,000 each.

The court also accused six police personnel of dereliction of duty and directed the SSP of Kaithal to take action against them. The personnel included head constable Jayender Singh, sub-inspector Jagbir Singh, and the members of the escort party provided to the couple. They claimed that the couple wanted them to leave. The SSP's statement was that "it is correct that the deceased couple had given in writing not to take police security any further, but Jagbir Singh was well aware that there was a threat to their lives from the relatives of the girl." The report stated that Jayender informed Gurdev Singh of the location of the police and that of Manoj and Babli over his mobile phone. Jayender was dismissed from the police force, and both he and Jagbir were penalised by a cut of two increments.

In her verdict, district judge Vani Gopal Sharma stated, "This court has gone through sleepless nights and tried to put itself in the shoes of the offenders and think as to what might have prompted them to take such a step." "Khap panchayats have functioned contrary to the constitution ridiculed it and have become a law unto them."

Bahadur was satisfied with the decision, "Out of seven accused, five have been given death sentences. This will send a strong message to the public that law is greater than the khap." However, he was disappointed that "the leader [Ganga Raj] got away with death penalty because he intentionally disappeared during the killing." Narendra said, "We will appeal in High Court for death penalty to the main accused, Ganga Raj. We respect the court's decision but he should be punished so that the instigators of the crime get the punishment. Also it is important that it is a very clear message so that no khap gives such directions, ever." Seema seconded Narendra's concerns, "We would have been happier if the main accused was also given the death sentence. The decision of the panchayat was not justified and people should not to be allowed to misuse their

power. We have fought this battle alone when no one was supporting us." She requested more security for her family, "They tried to bribe us to withdraw the case then they threatened that they would kill us if we didn't withdraw the FIR. Even after the decision we're afraid of a backlash from the Khap Panchayat."⁵

References

- [1] www.iosrjournals.org
- [2] www.womenrights.com
- [3] www.indianexpress.com
- [4] The Hindu: 29th March, 2010
- [5] www.wikipedia.in