



2026:DHC:5155



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\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

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*Date of Decision: 17.06.2026*

+ **W.P.(CRL) 1762/2026**

**SANDEEPA VIRK**

.....Petitioner

Through: Mr. Ashish Upadhayay and Ms.  
Chanchal Kumari, Advocates.

versus

**DIRECTORATE OF ENFORCEMENT**

.....Respondent

Through: Mr. Samrat Goswami, Advocate.

**CORAM:**

**HON'BLE MR. JUSTICE TEJAS KARIA**

**TEJAS KARIA, J. (Oral)**

1. The present Petition has been filed under Articles 226 and 227 of the Constitution of India, 1950 read with Section 528 of the Bharatiya Nagarik Suraksha Sanhita, 2023, seeking quashing of the order dated 21.05.2026 ("**Impugned Order**") passed by the learned Additional Sessions Judge-04, West District, Tis Hazari Courts, Delhi ("**Sessions Court**").
2. *Vide* order dated 06.05.2026 ("**Conditional Order**"), the learned Sessions Court allowed the Petitioner's application seeking release of her passport and permission to travel to Frankfurt, Germany, from 15.06.2026 to 15.07.2026, subject to certain terms and conditions.
3. *Vide* the Impugned Order, the learned Sessions Court dismissed the Petitioner's application seeking modification or relaxation of the conditions imposed under the Conditional Order.



4. Learned Counsel for the Petitioner submitted that the Petitioner, who is an actress, has received a proposal from *M/s Folk Studios* to act in a film, for which she is required to travel outside India from 15.06.2026 to 15.07.2026.
5. Learned Counsel for the Petitioner further submitted that the Petitioner seeks modification or relaxation of the conditions imposed by the learned Sessions Court under the Conditional Order, whereby the Petitioner was directed to furnish a Fixed Deposit Receipt (“**FDR**”) in the sum of ₹20,00,000/- (Rupees Twenty Lakh only) as security to ensure her return, along with an undertaking to appear before the learned Sessions Court. It was further directed that, in the event of her failure to report back, the said amount would stand forfeited without any further notice.
6. Learned Counsel for the Petitioner also submitted that, owing to the pendency of the proceedings before the learned Sessions Court and the stigma attached thereto, the Petitioner has not been receiving active work or confirmed assignments, save and except the invitation received from *M/s Folk Studios*.
7. Learned Counsel for the Petitioner further submitted that substantial assets of the Petitioner have already been frozen or attached by the Respondent, and that the Petitioner does not have sufficient liquid funds to furnish an FDR of ₹20,00,000/- (Rupees Twenty Lakh only), as directed by the learned Sessions Court under the Conditional Order.
8. Having heard learned Counsel for the Petitioner and upon perusal of the material placed on record, this Court is of the considered view that the assertion of financial incapacity advanced on behalf of the Petitioner



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remains unsubstantiated, as no documentary material has been placed on record in support of the said contention. Further, the mere existence of a professional engagement, irrespective of its genuineness, cannot by itself constitute a sufficient ground to warrant dilution of the conditions imposed by the learned Sessions Court under the Conditional Order, which were imposed with intention to secure the Petitioner's timely return and ensure her continued participation in the criminal proceedings.

9. This Court is of the opinion that the conditions imposed by the learned Sessions Court under the Conditional Order are just, fair and reasonable and have been imposed specifically to address the genuine apprehension that the Petitioner may not return to India within the stipulated period, particularly as she seeks permission to travel abroad while criminal proceedings against her remain pending.

10. In view of the above, no sufficient ground has been made out for interfering with the Impugned Order dated 21.05.2026 or for modification or relaxation of any of the conditions imposed under the Conditional Order dated 06.05.2026. Accordingly, the present Petition is hereby dismissed.

**TEJAS KARIA, J**  
**(VACATION JUDGE)**

**JUNE 17, 2026**

*N/ap*