



2026:DHC:5004



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

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Judgment reserved on: 26.05.2025
Judgment pronounced on: 01.06.2026
Judgment uploaded on: 02.06.2026

+ **BAIL APPLN. 2011/2026 & CRL.M.A. 16594/2026**

SANDEEP @ SUNNYPetitioner

Through: Mr. Prashant Sharma, Mr.
Sarhak Gupta , Ms Atti Tyagi,
Mr. Rohit Gupta, Advocates.

versus

THE STATE OF NCT OF DELHIRespondent

Through: Mr. Naresh Kumar Chahar,
APP for State.

+ **BAIL APPLN. 2037/2026 & CRL.M.A. 16800/2026**

PURAN CHANDPetitioner

Through: Mr. Prashant Sharma, Mr.
Sarhak Gupta , Ms Atti Tyagi,
Mr. Rohit Gupta, Advocates.

versus

THE STATE OF NCT OF DELHIRespondent

Through: Mr. Naresh Kumar Chahar,
APP for State.

+ **BAIL APPLN. 2045/2026 & CRL.M.A. 16845/2026**

SATWATIPetitioner

Through: Mr. Prashant Sharma, Mr.
Sarhak Gupta , Ms Atti Tyagi,
Mr. Rohit Gupta, Advocates.

versus

THE STATE OF NCT OF DELHIRespondent



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Through: Mr. Naresh Kumar Chahar,
APP for State.

CORAM:

HON'BLE DR. JUSTICE SWARANA KANTA SHARMA

JUDGMENT

DR. SWARANA KANTA SHARMA, J

CRL.M.A. 16594/2026 in BAIL APPLN. 2011/2026 (exemption)

CRL.M.A. 16800/2026 in BAIL APPLN. 2037/2026 (exemption)

CRL.M.A. 16845/2026 in BAIL APPLN. 2045/2026 (exemption)

1. Allowed, subject to all just exceptions.
2. Applications stand disposed of.

BAIL APPLN. 2011/2026, BAIL APPLN. 2037/2026 & BAIL APPLN. 2045/2026

3. **Yet another case of a young girl having lost her life within six months of the marriage** and registration of an FIR under Section 80 of BNS (*erstwhile 304B of IPC*) has resulted in filing of the present applications seeking anticipatory bail, filed by the accused/applicants – who are husband, father-in-law and mother-in-law of the deceased – in case arising out of FIR bearing no. 93/2026, registered at Police Station Tilak Nagar, Delhi, for the commission of offences punishable under Sections 85/80/3(5) of the Bharatiya Nyaya Sanhita, 2023 (hereafter '*BNS*'). *Vide* this common order, all the three applications shall be disposed of.

4. The primary common plea of the accused persons is the delay in lodging of the FIR, as also there being no specific elaborate allegations mentioned in the first statement given to the Executive



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Magistrate by the complainant-father. This plea is in the background of an undisputed fact that this statement was made by the complainant-father to the Executive Magistrate on the same day, when the daughter of the complainant was lying dead in the mortuary, having died an unnatural death, within six months of marriage. The applicants argue that this entitles them to grant of anticipatory bail.

BRIEF FACTS

5. Briefly stated, facts of the present case are that the deceased Heena @ Anu had got married to accused no.1/applicant Sandeep @ Sunny on 11.12.2024 in accordance with Hindu rites and ceremonies at Dada Chodarana Mandir, Dharamshala, Pooth Kalan, Delhi. It was alleged by the complainant, i.e. father of the deceased, that soon after the marriage, the deceased had been subjected to cruelty, harassment and humiliation by the accused persons on account of unlawful demands for dowry. It was further alleged that despite the complainant having incurred substantial expenditure and having fulfilled the demands raised at the time of marriage, the deceased had been continuously harassed in connection with dowry demands. The complainant further alleged that on 02.07.2025, he had received information from accused no.1 that the deceased had fallen from the staircase of her matrimonial home and had been admitted to a hospital in a critical condition. Upon reaching the hospital, the complainant had suspected foul play and had alleged that the accused



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persons had been giving differing versions regarding the incident. The deceased had subsequently succumbed to her injuries on 03.07.2025 during her treatment at the hospital. During inquiry, an MLC intimation pertaining to the deceased was received from DDU Hospital, wherein a history of hanging at the residence had been recorded, as informed by the husband. The crime scene had been inspected and proceedings under Section 196 of the BNSS had been conducted. Statements of the family members had then been recorded by the Executive Magistrate. As per the investigating agency, no allegations relating to dowry death had been made by the complainant or his family members in their statements before the Executive Magistrate and the apparent cause of death had *prima facie* been found to be hanging. Thus, no FIR was registered.

6. Thereafter, pursuant to directions issued by the learned Magistrate, the present FIR came to be registered on 13.03.2026.

SUBMISSIONS BEFORE THE COURT

7. The learned counsel appearing for the applicant Sandeep @ Sunny argues that the applicant has been falsely implicated in the present case and has no role whatsoever in the death of the deceased. It is submitted that on the intervening night of 01/02.07.2025, the deceased had attempted suicide by hanging after locking herself inside a room at the matrimonial home and that upon noticing the incident, the applicant had immediately rushed her to Amar Leela Hospital and thereafter shifted her to DDU Hospital for better



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treatment, but despite all efforts, she unfortunately succumbed on 03.07.2025. It is contended that the applicant had actively participated in her treatment, funeral and subsequent religious ceremonies and that no allegation of dowry demand, harassment or foul play had been made by the complainant or his family members at that stage. It is argued that during the inquiry conducted under Section 196 of BNSS, the statements recorded before the Executive Magistrate did not contain any allegation regarding dowry demands and, therefore, the subsequent allegations made by the complainant constitute a material improvement. It is further argued that the deceased had not been on cordial terms with her parental family, was unwilling to continue matrimonial life and had expressed a desire to devote herself to religious pursuits. The learned counsel further contends that after completion of the last rites, the complainant and his family members, in connivance with one Vansh Mathur, had allegedly demanded a sum of ₹1 crore, later reduced to ₹50 lakhs, from the applicant and his family members and had threatened to falsely implicate them upon their refusal to meet the said demand. It is submitted that the incident had taken place on 02.07.2025 and the deceased had expired on 03.07.2025, whereas the complaint was lodged much later i.e. 19.07.2025 and the FIR came to be registered only pursuant to directions of the learned Magistrate, which indicates that the allegations are an afterthought. It is also contended that no complaint regarding dowry harassment had ever been lodged during the lifetime of the deceased, that the parties belong to a modest



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economic background and that the allegations are false, fabricated and motivated. It is also submitted that the applicant has clean antecedents, is a permanent resident of Delhi, has cooperated with the investigation throughout and there is no likelihood of his absconding, tampering with evidence or influencing witnesses.

8. On behalf of the applicant Puran Chand, it is argued that the applicant has been falsely implicated merely because he is the father-in-law of the deceased and that no specific allegations have been levelled against him. It is argued that the deceased had attempted suicide on her own and that the applicant had no role whatsoever in the circumstances leading to her death. It is also stated that the statements recorded before the Executive Magistrate immediately after the death of deceased did not contain any allegation of dowry demand or harassment against the applicant and that the allegations subsequently levelled in the complaint dated 19.07.2025 are an afterthought. The learned counsel also submits that the applicant is an elderly person, has clean antecedents, has cooperated with the investigation and is neither likely to abscond nor to influence witnesses or tamper with evidence.

9. On behalf of the applicant Satwati, the learned counsel submits that she, being the mother-in-law of the deceased, has been roped into the present case on the basis of general and omnibus allegations without there being any independent material to substantiate any of the allegations or her involvement in the death of deceased. It is



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argued that the deceased had never lodged any complaint against the applicant during her lifetime and that the allegations relating to dowry demand and harassment have been concocted by the complainant. The learned counsel argues that no useful purpose would be served by subjecting the applicant to custodial interrogation and prays that she be granted the protection of anticipatory bail.

10. The learned APP for the State, on the other hand, opposes the present bail applications and argues that the allegations against the applicants are serious in nature and pertain to death of a young married woman within a short period of her marriage, coupled with allegations of dowry demand and harassment. It is contended that the investigation is still at a nascent stage and custodial interrogation of the applicants may be required for fair and effective investigation. The learned APP also argues that grant of anticipatory bail at this stage may adversely affect the investigation, as there exists a possibility of the applicants tampering with evidence, and influencing witnesses. It is thus contended that in view of the seriousness of the allegations leveled by the complainant in the FIR, the present bail applications be dismissed.

11. This Court has **heard** arguments addressed by the learned counsel for the accused/applicants as well as the learned APP for the State, and has perused material on record.

ANALYSIS & FINDINGS

12. At the outset, this Court notes that one of the primary



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arguments advanced on behalf of the applicants is that the FIR in the present case was not registered for about nine months, allegedly on account of contradictory complaints/statements made by the family members of the deceased, and that the applicants were never arrested during this period, and thus, there is no requirement for their custodial interrogation and that the present applications deserve to be allowed.

13. Dealing with the first and primary argument and question raised by the learned counsel for all the applicants, this Court has to necessarily deal with a situation where deciding this argument will also decide as to whether and **can the law expect parents, standing beside the body of their deceased daughter and struggling to come to terms with her death, to immediately recount every incident, every grievance and every allegation accumulated over the months of her matrimonial life?** Can a grieving parent be expected, within hours of such a loss, to give a complete detailed account of all the events which may have contributed to the unfortunate death of his or her daughter? Or can the law be so fragile that a defence founded solely upon the absence of detailed allegations in the earliest statements is accepted without examining the surrounding circumstances in which those statements came to be made?

14. In the present case, **what is of significance** is that both the father and the mother of the deceased, in their earliest statements



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recorded on 03.07.2025 before the Executive Magistrate, i.e. on the day their daughter had passed away, had clearly expressed suspicion against the in-laws of the deceased regarding the circumstances of her death. They had also specifically alleged that on 02.07.2025, they had been informed by the deceased's father-in-law that the deceased had fallen from stairs, however, eventually they had come to know that she had committed suicide. The deceased's parents had thus prayed for justice for their daughter. In this Court's view, once the deceased's parents had raised suspicion against her husband and in-laws, in a case involving the death of a young married woman within a few months of marriage, the matter required a prompt and effective response from the investigating agency.

15. Significantly, the statements of both parents were not ignored by the Executive Magistrate. After recording their statements, the Executive Magistrate had specifically directed the SHO, P.S. Tilak Nagar, to enquire into the matter and take action as per rules. Thus, the earliest version of the parents cannot be read as a clean chit to the accused persons merely because detailed allegations of dowry demand or cruelty were not articulated therein. The statements, when read as a whole, clearly reveal that the parents entertained suspicion regarding the role of the husband and in-laws of the deceased in the death of their daughter and sought intervention of the authorities. Once such suspicion was brought to the notice of the SHO concerned and the matter was forwarded for inquiry and action, the responsibility shifted to the investigating agency to conduct a



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meaningful investigation in accordance with law, moreso, since the deceased had died in unnatural circumstances, within less than seven months of the marriage.

16. **However**, the record reveals that despite the aforesaid direction, no FIR came to be registered in the present case. The investigating agency appears to have proceeded on the premise that since the parents had not clearly narrated allegations of dowry harassment in their statements before the Executive Magistrate, no further action was warranted.

17. **Faced with such inaction**, the father of the deceased submitted a detailed written complaint dated 19.07.2025. The complaint, significantly, was made within a short period of about two weeks from the date of death of his daughter. In the said complaint, the father elaborated upon the allegations which, according to him, had been narrated by the deceased during her matrimonial life, including alleged demands for dowry, acts of harassment, physical and mental cruelty, demands for money and other articles, and the circumstances which led him to suspect that the death of his daughter was not a mere accident. At this stage, the complaint dated 19.07.2025 appears to be a continuation and elaboration of the grievance already expressed by the deceased's family before the Executive Magistrate, rather than an entirely new story conceived at a later stage.

18. **What is even more concerning** is that despite receipt of the



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detailed complaint dated 19.07.2025, the investigating agency still did not register an FIR or undertake any effective investigation into the allegations made therein. The complainant thereafter was compelled to invoke the jurisdiction of the concerned Magistrate, being aggrieved by non-registration of FIR, and it was only pursuant to directions issued by the learned Magistrate under Section 175(4) of BNSS, that the present FIR ultimately came to be registered on 13.03.2026, i.e. more than eight months after the death of the deceased.

19. In view thereof, at this stage, therefore, this Court is unable to accept the submission made on behalf of the applicants, that the allegations made in the complaint dated 19.07.2025 deserve to be discarded merely because the same were not narrated by the deceased's family in detail in their statements recorded on 03.07.2025 before the Executive Magistrate. While observing so, this Court cannot ignore the fact that the FIR came to be registered only after judicial intervention. The delay in registration of the FIR, as noticed above, cannot be attributed only to the complainant. Rather, the record reflects that despite the direction issued by the Executive Magistrate to inquire into the matter and despite the complaint dated 19.07.2025 lodged by the deceased's father, the matter remained at the stage of inquiry for several months with the concerned Police Station. Therefore, the applicants cannot derive any advantage from the delay in registration of the FIR when the material on record suggests that the complainant had been pursuing his grievance from



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the inception. The evidentiary value and veracity of the allegations are matters to be tested during investigation and during trial. However, the chronology of events *prima facie* indicates that the earlier statements recorded before the Executive Magistrate cannot be viewed in isolation from the detailed complaint lodged by the deceased's father two weeks later, and the admitted inaction of the investigating agency which followed.

20. Now to deal with the **merits of the case**, and the allegations against the present accused/applicants, **a perusal of the complaint dated 19.07.2025** shows that the complainant has levelled detailed allegations against the husband as well as the in-laws of the deceased. It has been alleged that after the marriage dated 11.12.2024, the deceased was continuously subjected to harassment, humiliation and cruelty on account of dowry demands. The complainant has alleged that despite having incurred substantial expenditure on the marriage, to the tune of ₹7 lakhs and having fulfilled various demands of the accused persons, the deceased was repeatedly taunted for bringing inadequate dowry and was pressurised to procure further articles and money from her parental family. It was alleged that the deceased's mother-in-law used to instigate other family members to harass and beat the deceased in order to compel her to bring more dowry and on her instigation, the deceased had been beaten on several occasions by her husband, father-in-law and brother-in-law. It was also alleged that the husband and mother-in-law of the deceased had even forbidden the deceased from calling her parents, until they gave more dowry



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and fulfilled their demands. Specific allegations have been made regarding a demand for a heavier gold chain, as the applicant Sandeep had allegedly returned the gold chain weighing 1 *tola* which was given to him at the time of marriage and the complainant had then replaced it with a chain weighing 1.5 *tolas*. The complaint further alleges that on one occasion, the deceased was sent back to her parental home and was asked not to return until she brings an air-conditioner, due to which the complainant was left with no other option but to fulfil the said demand. Further, on one occasion, father-in-law of the deceased had allegedly asked her to bring ₹3.5 lakhs for constructions of a separate floor on the premises. It has also been alleged that in or around February, 2025, the deceased was compelled to sign divorce papers and was threatened with adverse consequences in case she declined to do so, since they had been approached by other persons who were willing to get their daughters married to the accused Sandeep and willing to give higher amount of dowry. It is also specifically alleged that the accused Sandeep had even slapped the deceased and threatened to kill her if she did not sign the divorce papers. The complainant has further alleged that the deceased had repeatedly informed her parental family regarding the physical and mental harassment being meted out to her by her husband and in-laws. The complaint attributes specific roles to the husband and in-laws of the deceased and alleges that the continuous acts of cruelty and dowry-related harassment ultimately culminated in the death of the deceased on 02.07.2025. At this stage, this Court *prima facie* is of



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the view that the complaint contains specific and serious allegations of demand of dowry and harassment against the present accused/applicants.

21. *As far as the role of the applicant Sandeep @ Sunny* is concerned, there are detailed and specific allegations against him. It has been alleged that he, being the husband of the deceased, had subjected her to continuous mental and physical cruelty on account of dowry demands and had repeatedly pressured her to bring money and other articles from her parental home. The complaint attributes a central role to him in the alleged acts of harassment suffered by the deceased and further alleges that he had threatened, humiliated and ill-treated her on various occasions during the short span of their matrimonial life. There are also specific allegations that he had supported and participated in the demands allegedly raised by other family members, physically assaulted the deceased, and had also compelled the deceased to sign divorce papers in or around February, 2025 and had also slapped her and threatened her with dire consequences.

22. *As far as the role of the applicant Puran Chand* (father-in-law of deceased) is concerned, this Court notes that he is not a distant relative, who has been implicated merely on account of his relationship with the principal accused. Rather, the complaint dated 19.07.2025 contains specific allegations against him. It has been alleged that he had actively participated in raising dowry demands



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and had subjected the deceased to harassment in connection therewith, including physical cruelty. The complainant has also specifically alleged that Puran Chand had demanded a sum of ₹3.5 lakhs for construction of a separate floor in the house and had pressurised the deceased and her parental family in this regard. At this stage, the Court is not required to examine the truthfulness of the allegations, however, the allegations against the applicant are specific in nature.

23. *As far as the role of the applicant Satwati* (mother-in-law of deceased) is concerned, this Court notes that the complaint also attributes a specific role to her in the alleged acts of cruelty and harassment suffered by the deceased during her matrimonial life. The complaint alleges that she had repeatedly taunted the deceased regarding the insufficiency and quality of dowry articles brought by her and had actively participated in pressurising the deceased and her family to fulfil further demands. She also allegedly used to instigate other family members to harass and beat the deceased so that she was compelled to bring more dowry. There are further allegations against her that she used to forbid the complainant from talking to her parents and other family members till they complied with their demands of dowry. Thus, the allegations against her relate to her alleged conduct towards the deceased during the brief period of matrimonial life preceding her death. Considering that the death of the deceased occurred within a few months of marriage and the allegations form part of the same chain of events which is presently under



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investigation, this Court is of the opinion that the role attributed to the applicant Satwati also requires a thorough investigation.

24. While examining the present applications, this Court is required to confine itself to the assessment of the material available on record. The deceased was admittedly married to the applicant on 11.12.2024 and died on 02.07.2025, i.e., within a period of less than seven months of the marriage. The complaint dated 19.07.2025 contains specific allegations of dowry demands, harassment and cruelty allegedly meted out to the deceased by the applicant and his family members. The allegations are neither vague nor omnibus in nature. Various specific instances have been mentioned and incidents narrated in the complaint which, according to the complainant, were disclosed by the deceased during her matrimonial life. At this stage, when the accused persons have not joined investigation and NBWs stand issued against them, the allegations cannot be brushed aside as inherently improbable.

25. While considering an application for grant of anticipatory bail, the Court is required to examine the nature and gravity of the accusations, the surrounding circumstances, the stage of investigation and the necessity of custodial interrogation of the accused persons.

26. Further, the defence sought to be projected by the applicants, that the complainant had demanded money from the accused persons after the death of their daughter and had got the FIR registered when they had refused to meet his demands, this Court is of the view that



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even before performing the last rites of their daughter they had already in their first statement to the Executive Magistrate mentioned that the accused persons are responsible for their daughter's death and he had pleaded for justice for himself and his dead daughter. This coupled with the fact that a detailed complaint was lodged by the complainant father sixteen days after the death of his daughter, which leveled serious and specific allegations, the plea of the applicants is found meritless and rejected at this stage.

27. Another aspect which cannot be ignored while deciding the present bail application is the fact that a helpless father was unable to get even the FIR registered regarding the death of his daughter within almost six months of the marriage. The system took almost nine months to register an FIR, resulting in plea by the applicants to grant bail due to such delay. However, the cry for justice and the obligation of law to do justice cannot be sacrificed at the altar of the delay caused by the investigating system.

28. Further, this Court is shocked that despite the crime scene having been inspected on the day the unfortunate incident of deceased having died, broken bangles and pieces of anklets of the deceased were found scattered on the floor. Despite this, it is shocking that the Police did not even then, deem it appropriate to conclude that the case needed probe and registration of the FIR. Resultantly, the accused persons were not arrested and investigation is still to be carried out after the accused persons joined investigation,



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which they have not till date.

29. Thus the investigation is still at a nascent stage. The status report itself indicates that various aspects of the matter are yet to be investigated. This Court finds substance in the submission of the learned APP for the State that a fair and effective investigation would require the investigating agency to examine the allegations regarding dowry demands, the circumstances preceding the death of the deceased, the conduct of the parties, the electronic evidence, and other material which may have a bearing on the truthfulness of the rival versions. At this stage, thus, the custodial interrogation of the applicants cannot be said to be unwarranted.

30. This Court is therefore of the considered opinion that the allegations in the present case pertain to the death of a young married woman within a few months of marriage and involve serious accusations of cruelty and dowry-related harassment. The gravity of the allegations, the stage of investigation and the overall facts and circumstances of the case do not persuade this Court to exercise its discretionary jurisdiction in favour of the applicants to grant them anticipatory bail.

31. **In view of the foregoing discussion**, this Court is of the opinion that the **applicants have failed to make out a case** for grant of the extraordinary relief of anticipatory bail.

32. The applications of all the applicants stand rejected.



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BEFORE PARTING WITH THE CASE

33. Though arguments are raised and **questions are asked frequently regarding the misuse of law, this is one such case where the Court has to rather question as to why machinery of law was not used and set into motion, where it was so required.** The evidence once lost in such cases where an innocent life already stood lost, is difficult to compensate by even orders as the present one and words of sympathy by the system.

34. **Before parting with the present case,** this Court is constrained, in view of the peculiar facts and circumstances brought before it, including the grievances voiced by the complainant-father who appeared before this Court during the hearing of the present bail applications, to take note of the apparent insensitivity displayed in dealing with the unnatural death by hanging of a young woman aged about 25 years, within barely a few months of her marriage. **These observations are not being made by this Court, merely to add length to this order,** but to send a clear message to those in the system, who show such insensitivity to such incidents, that the justice system will not show leniency to them.

Should the bereaved parents of a married daughter who dies unnatural death within a few months of marriage be denied, even the time to grieve?

35. A noteworthy aspect which is disturbing in this case is that the complainant-father was informed by the family of the deceased on



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02.07.2025 that she had fallen from the staircase and had called them to the matrimonial home. However, upon reaching DDU Hospital, they had come to know that the deceased had not fallen from the staircase, but rather, to their shock, committed suicide by hanging. She was unfit for statement and had died within a few hours of being taken to the Hospital. It would be natural that the parents of the deceased would have been under immense shock to have realized that their daughter, whom they had married a few months back, had hanged herself and was no more, while they were cognizant of the fact that she was being harassed for bringing insufficient dowry and specific incidents of demand of dowry etc., which the deceased had narrated to them, while she was alive.

36. Nevertheless, **neither the law nor the courts can be so insensitive as to deny bereaved parents, even the time and space to grieve over the untimely death of their daughter**, before expecting them to narrate every allegation with precision and completeness.

37. The present case brings forth the **story of a grieving father** who, on the very day of losing his young daughter, was expected to recount before the Executive Magistrate, every instance, of alleged cruelty, every demand for dowry, every humiliation suffered by his daughter in her matrimonial home, and every circumstance which, according to him, had led to her untimely death. This Court believes that such an expectation is detached from the realities of human



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conduct, in the circumstances as in the present case. A father who had just witnessed the death of his young daughter, whose body was still lying in the mortuary, and whom he had married off only a few months earlier, cannot reasonably be expected to narrate, with precision and completeness, the entire history of her matrimonial life while still reeling under the shock of her loss. The law cannot demand from a bereaved parent, in the immediate aftermath of such a tragedy, the composure of a trained investigator or the recollection of a meticulously prepared complainant.

When the time taken for registration of FIR was longer than the duration of marriage itself.

38. As also noted in the preceding discussion, the deceased was married on 11.12.2024 and allegedly committed suicide on 02.07.2025, i.e. within less than seven months of her marriage. However, the present FIR came to be registered only on 13.03.2026, pursuant to directions issued by the learned Magistrate, i.e. more than eight months after her death. Thus, **the registration of the FIR in relation to the unnatural death of a young woman took more time than the entire duration of her marriage itself.**

39. In the opinion of this Court, the consequences of such delay in lodging the FIR cannot be lightly brushed aside. Cases involving the unnatural death of a young married woman clearly demand prompt and diligent investigation by the police authorities. Every passing day carries the possibility of loss or disappearance of evidence, fading of



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witnesses' memory and erosion of other evidentiary material that may assist in discovering the truth.

40. The purpose of an investigation is to uncover the truth. It is not expected of grieving parents to present a complete and structured prosecution case within hours of suffering an irreparable loss of their daughter, raised by them with love and married in the accused family. Therefore, **what is difficult to understand** is that the parents of the deceased had already expressed their suspicion against the matrimonial family before the Executive Magistrate on 03.07.2025 itself. The Executive Magistrate, after recording their statements, had directed the SHO to enquire into the matter and take action as per rules. Thereafter, when a detailed written complaint was submitted on 19.07.2025 containing specific allegations, the matter still did not culminate in registration of an FIR. The record, therefore, *prima facie* reflects that despite the matter having been brought to the notice of the authorities at the earliest point of time, the criminal law was not set in motion.

41. The proceedings before the learned Magistrate, under Section 175(3)/(4) of BNSS further reveal the manner in which the complaint remained pending. In the order dated 28.02.2026, the learned Magistrate records that the Inquiry Officer had filed an Action Taken Report (ATR) along with the statements of the complainant and his wife recorded before the Executive Magistrate. The learned Magistrate also records that the concerned DCP had filed a reply



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before the Court stating that disciplinary action had been initiated against the SHO, P.S. Tilak Nagar. The order further notes that although the Executive Magistrate had directed inquiry into the matter on 03.07.2025 itself, no conclusive ATR had been filed despite sufficient time having been granted. It was in these circumstances that the learned Magistrate directed that the ATR be filed under the supervision of the concerned DCP.

42. This Court also finds it significant that even the learned Magistrate, while considering the material placed before him, noticed that the parents had been informed about the incident in the early hours of 02.07.2025, that the deceased had subsequently succumbed during treatment, and that the Executive Magistrate had directed inquiry into the matter. Yet, despite the passage of several months, the inquiry had not reached any logical conclusion. Eventually, *vide* order dated 06.03.2026, the learned Magistrate observed that, according to the complainant, the deceased had committed suicide within one year of her marriage and had been subjected to cruelty prior thereto. Upon perusal of the complaint and the material on record, the learned Magistrate formed a *prima facie* opinion that the facts disclosed commission of a cognizable offence and accordingly directed registration of the FIR under the relevant provisions of law. It is therefore evident that the FIR came to be registered only after a judicial order directing the police to do so.

43. This Court is also of the view that the **learned Magistrate was**



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conscious of the serious consequences that may follow from delay in registration of an FIR in a case of this nature and had, therefore, taken appropriate steps, including calling for reports and issuing directions to the concerned DCP. However, it is also a matter of record that the application filed by the father of the deceased seeking registration of FIR remained pending for a considerable period of time before the learned Magistrate.

44. **This Court hopes that, in future, applications seeking directions for registration of FIR**, concerning the unnatural death of a young woman within a short period of marriage, particularly where allegations of dowry-related harassment are raised and the police fail to register an FIR, **shall be taken up with greater urgency by the Courts and be listed on shorter dates so that the issue of registration of FIR and commencement of investigation is not left unresolved for months together.**

45. This Court also sincerely hopes that the investigation, which has now finally been set into motion, reaches its logical conclusion uninfluenced by the omissions and commissions that appear to have marked its initial stages. The record further reveals that the concerned DCP had informed the learned Magistrate that disciplinary proceedings had been initiated against the erring police officials so that accountability, wherever required, is duly fixed.

A Parent's Loss, and the Search for Truth

46. In this Court's opinion, the parents of the deceased did what



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any ordinary citizen would be expected to do. They approached the authorities, made statements before the Executive Magistrate and subsequently submitted a detailed complaint to the concerned SHO. But they were ultimately compelled to pursue remedies before the Court for registration of an FIR. The record itself reflects that the learned Magistrate found it necessary to repeatedly seek explanations regarding the manner in which the matter had been handled, and the concerned DCP informed the Court that disciplinary proceedings had been initiated against the erring police officials.

47. **The unfortunate reality**, however, is that the father of the deceased was made to run from pillar to post only to ensure that an FIR is registered and investigation is conducted regarding the unnatural death of his young daughter.

48. For the reasons mentioned in the above discussion, this Court dismisses the above bail applications preferred by the accused/applicants. Pending applications also stand disposed of.

49. It is, however, clarified that nothing expressed hereinabove shall tantamount to an expression on the merits of the case.

50. The judgment be uploaded on the website forthwith.

DR. SWARANA KANTA SHARMA, J

JUNE 01, 2026/vc

T.S./T.D.