

Nodal Officers On Paper, Mobs On Streets Auditing The Gap Between Judicial Direction And Statutory Codification In India's Response To Mob Lynching

Tarun Gaur¹, Dr. Mahendra Pratap Singh²

¹Ph.D. Scholar Mangalayatan University Beswan, Aligarh Email: tarun.gaur6789@gmail.com Enrollment No.- 20221442

²Assistant Professor Mangalayatan University Beswan, Aligarh Email: mpsingh22227@gmail.com

Abstract

Mob violence and lynching have persisted in India despite a detailed set of preventive, remedial, and punitive directions issued by the Supreme Court of India in *Tehseen S. Poonawalla v. Union of India* (2018). Nearly eight years after the judgment, states report near-universal appointment of “nodal officers,” yet the incidence and impunity surrounding mob violence continue largely unabated, exposing a wide compliance-implementation gap. The recent enactment of the Bharatiya Nyaya Sanhita (BNS), 2023, the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023, and the Bharatiya Sakshya Adhinyam (BSA), 2023, has, for the first time, given India a codified offence of mob lynching under Section 103(2) BNS. This paper audits the trajectory from judicial guideline to statutory codification, examines why administrative compliance has not translated into deterrence or accountability, and identifies the structural, institutional, and procedural weaknesses responsible for this gap. Drawing on Supreme Court and High Court proceedings through 2025, media-monitoring data on lynching incidents, and a doctrinal comparison of the erstwhile Indian Penal Code with the Bharatiya Nyaya Sanhita, the paper argues that formal compliance without embedded accountability mechanisms — performance audits, disciplinary consequences for dereliction, victim-compensation enforcement, and independent oversight — renders judicial directions symbolic rather than operative. The paper concludes with a reform framework centred on statutory backing for nodal-officer duties under the BNSS, time-bound reporting to High Courts, and integration of police-accountability metrics into the new procedural code.

Keywords: mob lynching, nodal officers, police accountability, Tehseen Poonawalla, Bharatiya Nyaya Sanhita, judicial directions

1. Introduction

Public trust in the rule of law depends not merely on the existence of protective legal norms but on their consistent enforcement. India's experience with mob violence — variously linked to cow vigilantism, child-lifting rumours, communal tension, and caste assertion — illustrates a recurring pattern in which courts issue elaborate preventive frameworks that state machinery adopts only nominally. The Supreme Court's intervention in *Tehseen Poonawalla* was widely regarded as a watershed moment, establishing an administrative architecture of “nodal officers” meant to operationalise prevention at the district level (Supreme Court Observer, 2023). Yet subsequent contempt proceedings, status reports, and continuing incidents of lynching indicate that the architecture has often existed more in official affidavits than in operational practice (LiveLaw, 2024; The Quint, 2024).

The introduction of the BNS, BNSS, and BSA from 1 July 2024 marks a second, statutory phase in this trajectory. For the first time, Indian criminal law defines and punishes group-based, prejudice-motivated killing as a distinct offence rather than treating it as ordinary murder under Section 302 of the erstwhile Indian Penal Code (Drishti Judiciary, 2024; PIB India, 2024). This paper asks a narrower and more operational question than “does the law exist”: does the shift from judicial direction to statutory codification close, or merely relocate, the accountability gap that has characterised implementation since 2018?

The paper's title captures its central finding — that administrative compliance (“nodal officers on paper”) has coexisted with continuing street-level impunity (“mobs on streets”), and that new codification alone, without embedded institutional accountability, is unlikely to resolve this. To substantiate this finding, the paper is organised as follows. Section 2 reconstructs the *Tehseen Poonawalla* framework and its tripartite architecture. Section 3 audits compliance using Supreme Court and High Court proceedings through 2025, supported by incident-level data. Section 4 examines the BNS's statutory codification of mob lynching and situates it against the erstwhile IPC. Section 5 identifies three recurring structural gaps in police accountability. Section 6 presents an illustrative case timeline. Section 7 sets out a reform framework, and Section 8 concludes.

Methodologically, the paper adopts a doctrinal and policy-analytical approach: it reconstructs the judicial directions from the text of the judgment and subsequent orders, cross-references these with reported compliance data (state affidavits, media-monitoring datasets, and High Court orders), and evaluates the new statutory text for its institutional — as opposed to purely substantive — content. This method is chosen because the central claim of the paper is not

that the law is absent, but that the institutional scaffolding required to operationalise the law has remained thin across two distinct legal regimes.

2. Background: The Tehseen Poonawalla Framework

2.1 Origins of the Petition

Tehseen S. Poonawalla v. Union of India (2018) arose from writ petitions filed by activist Tehseen Poonawalla and Tushar Gandhi, seeking court intervention against escalating incidents of cow-vigilante violence and mob lynching (Lawbhoomi, 2024; Judicate Me, n.d.). A three-judge bench led by Chief Justice Dipak Misra held that no individual or mob, however aggrieved by a perceived transgression, may arrogate to itself the power to punish, since doing so corrodes the rule of law that underwrites a constitutional order (The Quint, 2024). The Court, invoking its powers under Article 141, issued a tripartite framework of preventive, remedial, and punitive measures binding on all authorities (StudyIQ, 2025).

2.2 The Tripartite Framework

The preventive limb required every state to designate a senior police officer, not below the rank of Superintendent of Police, as a district-level nodal officer supported by a Deputy Superintendent, tasked with identifying vulnerable areas, monitoring hate speech and misinformation online, and coordinating with local intelligence units (Lawful Legal, 2025; CaseMine, 2018). The remedial limb mandated prompt FIR registration, victim compensation schemes, free legal aid, and trial in designated fast-track courts (Lawbhoomi, 2024). The punitive limb held state officials personally accountable for dereliction of duty in preventing or responding to mob violence, and departmental action was directed against officers found negligent (StudyIQ, 2025). Significantly, the Court also recommended that Parliament enact a standalone anti-lynching law, observing that a dedicated statute would instil the deterrent “fear of law” that ordinary provisions had failed to generate (Indian Kanoon, 2018). Table 1 summarises the three limbs.

Table 1. The tripartite preventive-remedial-punitive framework in Tehseen S. Poonawalla v. Union of India (2018).

Limb	Core obligation	Illustrative content
Preventive	District-level nodal officer (not below SP rank), supported by a Deputy SP	Identify vulnerable areas; monitor hate speech/misinformation; coordinate with local intelligence units; constitute a Special Task Force
Remedial	Victim-centred procedural guarantees	Prompt FIR registration; victim compensation scheme; free legal aid; trial in designated fast-track courts within a fixed period
Punitive	Personal accountability of state officials	Departmental/disciplinary action for dereliction; recommendation for a standalone anti-lynching statute

Read together, the three limbs were designed as a self-reinforcing cycle: prevention was meant to reduce the incidence of violence; remediation was meant to ensure that where violence occurred, victims were not left without recourse; and the punitive limb was meant to give the first two limbs teeth by attaching personal consequence to institutional failure. Figure 1 depicts this intended architecture and marks the point, identified in Section 3 below, at which the design has proved structurally weakest in practice — the absence of a standardised, independently verified reporting and audit layer connecting the district-level nodal officer to enforceable consequence.

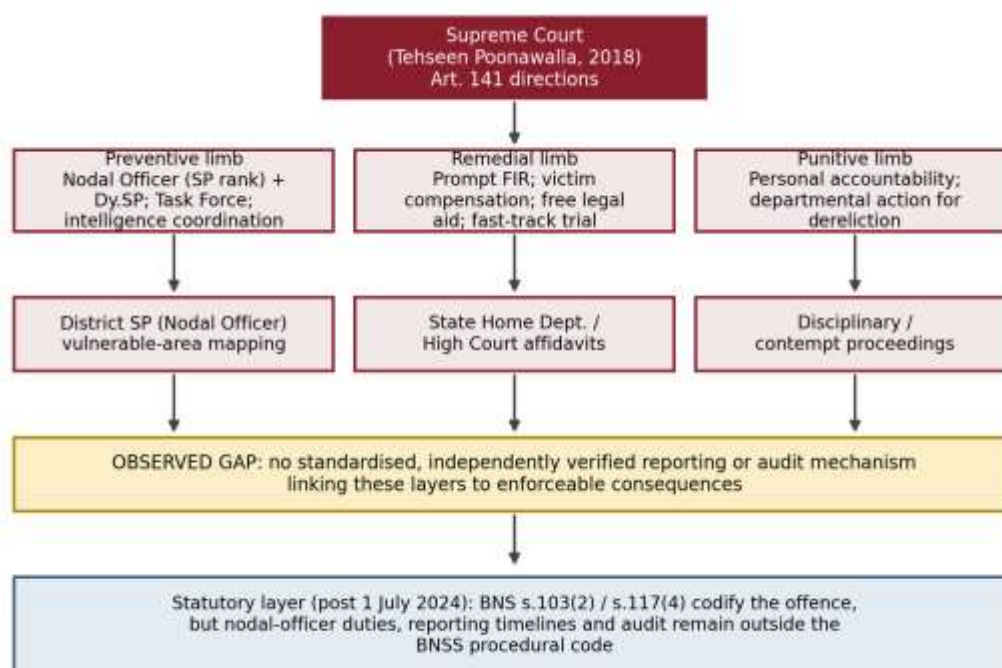


Figure 1. Intended institutional architecture of the Tehseen Poonawalla framework, showing the point of structural weakness identified in this paper.

3. Auditing Compliance: Nodal Officers on Paper

By the Centre's own submission to the Supreme Court, 28 states had appointed nodal officers in purported compliance with the Tehseen Poonawalla directions (LiveLaw, 2024). On its face, this suggests near-complete administrative uptake. However, four recurring patterns, traced across proceedings from 2018 to 2025, complicate this picture of compliance.

3.1 Appointment Without Operationalisation

Case commentary following the judgment records that a lynching occurred in Alwar within days of the ruling, prompting the Supreme Court to initiate contempt proceedings against the state for negligence (Lawbhoomi, 2024). This indicates that the mere existence of a nominated nodal officer did not translate into functioning early-warning or intervention capacity on the ground. The pattern is not confined to 2018: as documented in Section 6 below, comparable gaps between appointment and operational capacity recur in incidents as recent as December 2025.

3.2 Absence of Standardised Reporting or Audit Mechanisms

The directions required nodal officers to hold regular meetings with local intelligence units and station house officers, and to identify high-risk localities, but no independent, court-supervised audit mechanism was built into the framework to verify that such meetings occurred, that risk-mapping was updated, or that patrolling was intensified in flagged areas (Lawful Legal, 2025). Compliance has largely been self-reported through state affidavits rather than externally verified. This weakness became explicit in October 2023, when senior counsel for the petitioners informed the Supreme Court that state-government websites did not carry details of appointed nodal officers, prompting the Bench to again direct the Union and all states to file compliance affidavits and to place appointment data in the public domain (Prokerala, 2023).

3.3 Absence of Consequence for Non-Compliance

Although the judgment contemplated disciplinary and even contempt action against derelict officials, subsequent commentary observes that despite continued incidents — including a lynching just sixty kilometres from Delhi years after the ruling — no systemic pattern of departmental accountability has emerged (Lawful Legal, 2025). Senior counsel appearing in follow-up proceedings has argued that such recurring incidents reveal patterns of targeted violence against specific religious and caste groups, implicating constitutional guarantees against discrimination under Article 15 (Lawful Legal, 2025).

3.4 Continuing Judicial Monitoring, 2023–2025

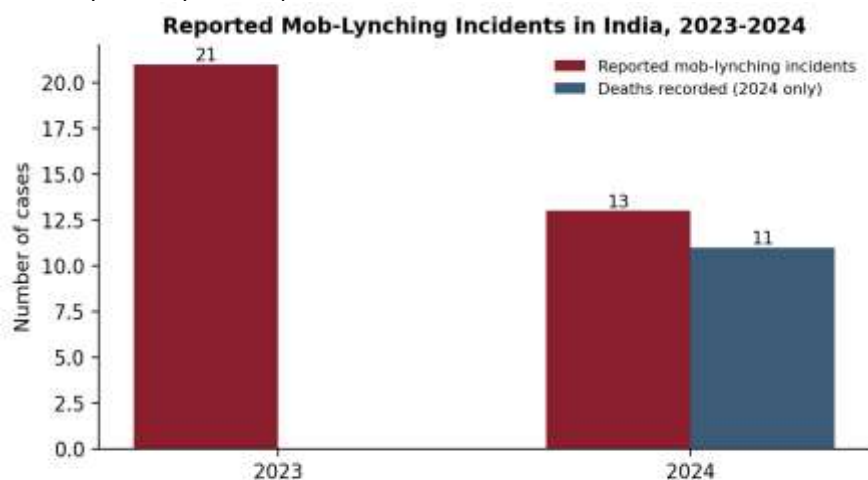
Proceedings since 2023 show the Supreme Court and High Courts repeatedly returning to the same compliance questions rather than being able to treat the matter as settled. In November 2024, on a public interest litigation filed by the National Federation of Indian Women, the Supreme Court warned five states that their Chief Secretaries would be required to appear in person if counter-affidavits on compliance were not filed — a signal that ordinary affidavit practice had, in the Court's assessment, proved insufficient to secure a response (Maktoob Media, 2024). At the High Court level, the Allahabad High Court in July 2025 directed the Uttar Pradesh government to file a better compliance affidavit in a matter arising from a mob-lynching incident in Moradabad, after finding that the state had shown no demonstrated steps under the remedial-measures paragraphs of Tehseen Poonawalla, and separately noted that the FIR in that case had not invoked Section 103(2) of the BNS as it should have (LiveLaw, 2025). Together, these episodes indicate that the compliance-verification problem identified in 2018 has persisted through both the pre- and post-BNS periods.

Incident-level data corroborates the persistence of the underlying problem, even as the institutional response has evolved. Media-monitoring by the Centre for Study of Society and Secularism (CSSS), based on five leading English- and Urdu-language dailies, recorded 109 mob-lynching incidents nationally between January 2014 and July 2018, resulting in 78 deaths and 174 injuries (CJP, 2018). Maharashtra, Uttar Pradesh, and Jharkhand together accounted for just under half of all recorded incidents in that period, as set out in Table 2.

Table 2. State-wise distribution of mob-lynching incidents, January 2014 – July 2018 (CSSS media-monitoring data).

State / Category	Incidents	Share of total	Rank
Maharashtra	22	20.2%	1
Uttar Pradesh	19	17.4%	2
Jharkhand	10	9.2%	3
All other States/UTs (combined)	58	53.2%	—
All-India total	109	100%	—

More recent CSSS data shows a decline from 21 recorded incidents in 2023 to 13 in 2024, resulting in 11 deaths, even as communal riots more broadly were reported to have risen sharply over the same period (CSSS, 2025). Figure 2 sets out this year-on-year comparison.



Source: Centre for Study of Society and Secularism (CSSS), Communal Riots and Mob Lynching Report, 2024 (media-monitoring based estimates).

Figure 2. Reported mob-lynching incidents in India, 2023 and 2024 (CSSS media-monitoring data).

Projections for 2025, built on early-year monitoring by the South Asia Justice Campaign together with the CSSS 2024 baseline, estimate approximately 15 incidents nationally, with Uttar Pradesh, Maharashtra, and a cluster of states reporting one incident each accounting for most of the projected total (IndiaDataMap, 2025). Figure 3 shows the projected state-wise distribution.

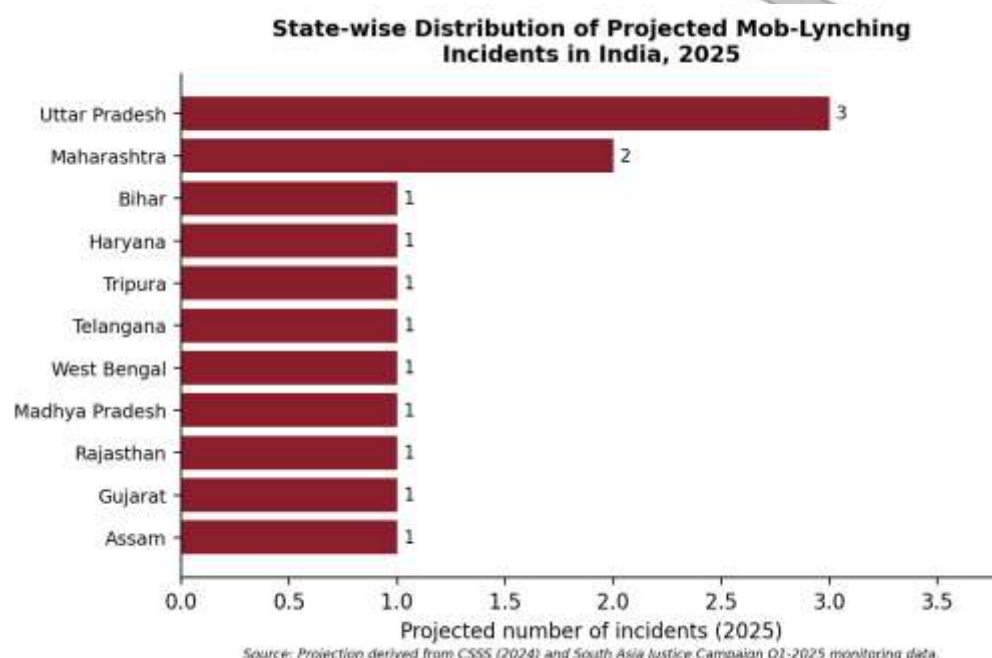


Figure 3. Projected state-wise distribution of mob-lynching incidents in India, 2025 (derived from CSSS and South Asia Justice Campaign monitoring data).

This gap between designation and deterrence is the empirical core of the “nodal officers on paper” problem: an administrative box has been ticked, but the accountability logic that was meant to animate the position — visibility, responsiveness, and consequence for failure — has not been institutionalised. The persistence of comparable incident volumes and comparable judicial complaints across a seven-year span, spanning both the pre-codification and post-codification periods, suggests that the gap is structural rather than transitional.

4. From Judicial Direction to Statutory Codification: The New Criminal Laws

The BNS, BNSS, and BSA, which came into force on 1 July 2024, represent Parliament's long-delayed response to the Supreme Court's 2018 recommendation for a dedicated legal provision on lynching (Law Notes, n.d.). Section 103(2) of the BNS now provides that where a group of five or more persons, acting in concert, commits murder on grounds of race, caste, community, sex, place of birth, language, personal belief, or any other similar ground, each member of the group is liable to death, life imprisonment, or a minimum term of seven years' imprisonment, together with a fine (PIB India, 2024; ApniLaw, 2025). A related provision, Section 117(4) BNS, extends liability to mob-inflicted grievous hurt short of death (Drishti Judiciary, 2024). This marks a structural departure from the erstwhile IPC's individualised model of criminal liability under Section 302, since it recognises collective, prejudice-motivated violence as an aggravated and distinctly labelled offence rather than folding it into ordinary homicide (Advocate Shruti Goyal, 2026).

Table 3 compares the two regimes.

Attribute	IPC, 1860 (Section 302)	BNS, 2023 (Sections 103(2) & 117(4))
Conceptual basis	Individualised liability for murder; mob context treated through general principles of common intention/unlawful assembly	Distinct, collectively-labelled offence for group killing motivated by identity-based prejudice
Trigger threshold	No numerical threshold; common intention/object doctrines applied case-by-case	Five or more persons acting in concert, on specified discriminatory grounds

Attribute	IPC, 1860 (Section 302)	BNS, 2023 (Sections 103(2) & 117(4))
Named grounds	Not specified as an element of the offence	Race, caste, community, sex, place of birth, language, personal belief, or any other similar ground
Punishment	Death, life imprisonment, or imprisonment for a term (Section 302)	Each member of the group: death, life imprisonment, or minimum seven years, plus fine (s.103(2)); separate provision for mob-inflicted grievous hurt short of death (s.117(4))
Institutional scaffolding	None specific to mob violence	Not codified in BNSS; nodal officers, task forces and reporting remain judicial-direction based

Table 3. Comparison of the erstwhile IPC, 1860 (Section 302) and the BNS, 2023 (Sections 103(2) and 117(4)) on group-based, prejudice-motivated violence.

Commentators have flagged an early drafting anomaly: the Jharkhand High Court took suo motu cognisance of a discrepancy in some printed versions of Section 103(2), where the qualifying phrase “any other similar ground” was rendered simply as “any other ground,” a distinction with real interpretive consequences for the scope of the offence, and directed the publisher to correct it (Drishti Judiciary, 2024). Such textual instability in a newly codified offence underscores the importance of careful implementation guidance alongside the bare statutory text — a concern that echoes, at the level of statutory drafting, the same absence-of-verification problem documented administratively in Section 3.

While Section 103(2) BNS supplies the substantive offence that Tehseen Poonawalla had recommended, it is substantive law alone; the procedural and institutional scaffolding — nodal officers, task forces, time-bound investigation, victim compensation — remains rooted in judicial directions rather than in the BNSS itself. This creates a bifurcated legal architecture: a hard-edged, codified offence sitting atop a soft, direction-based enforcement structure whose implementation weaknesses (documented in Section 3 above) have not been remedied by codification. The Moradabad episode discussed in Section 3.4, in which police reportedly did not initially invoke Section 103(2) despite facts suggesting a mob-lynching, illustrates precisely this bifurcation: the existence of a codified offence did not, by itself, ensure its correct invocation at the point of first police response.

5. Structural Gaps in Police Accountability

Three structural gaps recur across both the judicial-direction era and the new statutory era. A fourth — the absence of verified public disclosure — has become increasingly visible in litigation since 2023 and is treated here as a distinct, related gap. Table 4 summarises all four before each is discussed in turn.

Table 4. Structural gaps in police accountability for mob violence: manifestation and consequence.

Structural gap	Manifestation	Consequence
No statutory backing for the nodal officer role	Role rests on judicial direction, not on BNSS; no defined job description, tenure, or funding	Enforceability depends on episodic contempt litigation rather than routine law
Weak internal disciplinary linkage	No framework defines actionable dereliction, the investigating authority, or timelines	Accountability contingent on political will and media visibility
Fragmented data and oversight	No centralised public dashboard for appointments, response times, or conviction rates	External audit remains reactive and case-specific, not systemic

Structural gap	Manifestation	Consequence
Absence of verified public disclosure	Petitioners informed the Supreme Court that state-government websites carried no details of appointed nodal officers	Undermines public accessibility and verifiability that the framework presupposes

5.1 Absence of Statutory Backing for the Nodal Officer Role

The nodal officer function remains a creature of judicial direction rather than an office defined, funded, and made answerable under the BNSS. Without a procedural-code anchor, the role lacks a standard job description, minimum service conditions, or reporting timelines enforceable independent of episodic contempt litigation. This absence also has a practical consequence for transfers and postings: because the role is not a statutorily defined post, there is no established mechanism ensuring continuity of institutional knowledge when an officer holding the nodal designation is transferred, promoted, or retires — a gap not addressed in any of the reported compliance affidavits.

5.2 Weak Internal Disciplinary Linkage

Tehseen Poonawalla contemplated departmental action against officers who fail to prevent or respond to mob violence, but no framework specifies what constitutes actionable dereliction, who investigates it, or within what timeframe. This leaves accountability dependent on political will and media visibility rather than routine institutional process. The absence of a defined disciplinary matrix means that even where a court records a finding of non-compliance — as the Allahabad High Court did in the Moradabad matter — the finding does not automatically trigger a defined administrative consequence; it instead generates a further round of affidavit-filing.

5.3 Fragmented Data and Oversight

No centralised, court- or Parliament-mandated public dashboard tracks nodal officer appointments, vulnerable-area identification, incident response times, FIR-to-chargesheet timelines under Section 103(2) BNS, or conviction rates. Absent such data, external audit — by courts, the National Human Rights Commission, Parliament, or civil society — remains reactive and case-specific rather than systemic. The reliance of this paper itself on media-monitoring datasets compiled by a civil-society organisation, rather than on an official government dataset, is illustrative of the gap it describes.

5.4 Absence of Verified Public Disclosure

A gap distinct from, but closely related to, the reporting deficit in Section 5.3 is the absence of verified public disclosure of compliance itself. The 2023 submission to the Supreme Court that no state-government website carried details of appointed nodal officers (Prokerala, 2023) shows that even where appointments have occurred, the public-facing transparency that would allow citizens, journalists, and civil-society monitors to verify compliance independently of state affidavits has not been institutionalised. This gap undermines the deterrent value of the preventive limb, since a framework designed in part to signal state vigilance cannot perform that signalling function if its existence is not publicly ascertainable.

6. Illustrative Case Timeline

The pattern identified in Sections 3 and 5 — appointment without verified operationalisation — is not confined to a single moment in 2018. Table 5 sets out a small illustrative timeline of incidents and proceedings spanning the pre-codification and post-codification periods, showing the same structural gap recurring under both regimes.

Table 5. Illustrative timeline of incidents and judicial proceedings, 2018–2025.

Date	Location	Significance
Jul 2018	Alwar, Rajasthan	Lynching within days of the judgment prompted contempt proceedings against the State, illustrating that appointment of a nodal officer had not translated into on-ground prevention
2023	National (SC hearing)	Petitioners' counsel informed the Supreme Court that state-government websites carried no published details of nodal officers, prompting a fresh direction for public disclosure
2024	Five States (SC hearing)	Supreme Court warned five States that Chief Secretaries would be required to appear in person if compliance affidavits were not

Date	Location	Significance
		filed, in proceedings on a PIL by the National Federation of Indian Women
Jul 2025	Moradabad, Uttar Pradesh	Allahabad High Court directed the State to file a better compliance affidavit after finding no demonstrated steps under the remedial-measures paragraphs of Tehseen Poonawalla, and noted the FIR had not invoked Section 103(2) BNS as it should have
Dec 2025	Kanker district, Chhattisgarh	A dispute over a Christian burial escalated into mob violence, with churches set on fire and homes destroyed, underscoring continuing gaps in early-warning and intervention capacity

Read chronologically, the timeline suggests that the passage of the BNS in 2024 has not, of itself, altered the recurring pattern documented since 2018: incidents continue to occur in areas that ought to have been flagged under the preventive limb, and courts continue to find that state compliance affidavits fall short of demonstrating operational implementation, whether the applicable substantive law is Section 302 IPC or Section 103(2) BNS.

7. Recommendations

Building on the preceding audit, this paper advances six reform proposals, summarised in Table 6 and elaborated below.

Table 6. Recommendations, responsible authority, and accountability mechanism.

Recommendation	Responsible authority	Accountability mechanism
Statutory codification of the nodal-officer role under the BNSS	Parliament, via amendment to BNSS	Appointment criteria, minimum tenure, reporting obligations to a designated High Court bench
Mandatory quarterly compliance reporting	State governments → respective High Courts	District-disaggregated activity logs, patrolling data, social-media monitoring outcomes
Defined disciplinary matrix	State Home Departments / DGP offices	Categories of dereliction linked to specific administrative consequences
Fast-track court benchmarks	High Courts / State judicial academies	Statutorily prescribed trial timelines under s.103(2) BNS; public pendency reporting
Independent audit mechanism	NHRC or a Supreme Court-appointed monitoring committee	Unannounced compliance verification, independent of state self-reporting
Victim-compensation enforcement tracking	State Legal Services Authorities	Time-bound disbursal and public audit of compensation and legal-aid commitments

The first proposal targets the statutory gap identified in Section 5.1 directly, while the second addresses the reporting deficit of Section 5.3 by replacing episodic, litigation-triggered affidavits with a standing quarterly obligation. The third and fourth proposals respond to the weak disciplinary linkage documented in Section 5.2 and the recurring prosecutorial delay illustrated in Table 5, respectively. The fifth and sixth proposals institutionalise, in permanent form, the kind of scrutiny that has so far occurred only through episodic litigation — the NFIW petition and the Moradabad

proceedings discussed in Section 3.4 being illustrative examples of what an independent, standing mechanism could otherwise perform routinely.

A seventh, cross-cutting proposal follows directly from Section 5.4: state governments should be statutorily required to publish nodal-officer contact details and district-level risk assessments on a standard public portal, addressing the verified-disclosure gap identified by petitioners before the Supreme Court in 2023. Public disclosure of this kind would also lower the cost of independent civil-society and media monitoring of the kind on which Tables 2, 3, and the incident data in Section 3 already rely, thereby strengthening exactly the external-audit function that Sections 5.3 and 5.4 identify as currently missing.

8. Conclusion

The trajectory from *Tehseen S. Poonawalla v. Union of India* (2018) to Section 103(2) of the *Bharatiya Nyaya Sanhita*, 2023, reflects a meaningful legislative response to a long-standing judicial call for a dedicated offence addressing mob violence. Yet codification of substantive liability does not, by itself, resolve the institutional accountability deficit that has characterised implementation since 2018. Nodal officers have been appointed in the great majority of states, but the evidentiary record — continuing incidents through 2025, stalled or incorrectly framed prosecutions, and an absence of routine disciplinary consequence — suggests that appointment has too often been treated as a terminal compliance step rather than the beginning of an accountability process.

A durable solution requires embedding the enforcement architecture that judicial directions first sketched into the statutory and procedural framework of the new criminal laws themselves, coupled with independent audit and disciplinary mechanisms capable of converting formal compliance into operative deterrence. Until that embedding occurs, the risk documented throughout this paper is that each new legal instrument — whether a judicial direction in 2018 or a codified offence in 2024 — will continue to generate compliance on paper without a corresponding reduction in mob violence on the street.

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