- Suneeti Toteja v State of Uttar Pradesh
  - Supreme Court Ruling
    - Appeal Allowed
    - Chargesheet Quashed
    - Summoning Order Quashed
    - Consequent Steps Vitiated
    - Magistrate Incorrect
    - No Deemed Sanction (Section 197 CrPC)
    - BIS Denied Sanction
  - Case Background
    - Origin: Sexual Harassment Complaint (2012)
    - Complainant: Dr. Manisha Narayan
    - Alleged Harasser: Dr. S.S. Ghonkrorkta
    - ICC Report (2015): Ghonkrorkta Guilty
    - FIR Filed (2018): No Appellant Named
    - Appellant: Suneeti Toteja
      - Permanent BIS Employee
      - On Deputation at FSSAI (2016-2019)
      - Appointed ICC Presiding Officer (May 2016)
    - Allegations Against Appellant (Oct 2020)
      - Filing Counter Affidavit (CAT) Without Consent
      - Threatening/Pressuring Complainant
    - Chargesheet Filed (July 2022)
    - Sanction Denied by BIS (Nov 2022)
    - Magistrate Took Cognizance Despite Denial
    - High Court Dismissed Quashing Plea
  - Legal Substance: Section 197 CrPC
    - Mandates Prior Sanction
    - For Public Servants
    - Offenses in Official Duty
    - Safeguards Public Servants
    - Test: Directly Concerned with Official Duties
    - Applies to Purported Official Power
    - Not Needed if Unconnected to Duty
    - No 'Deemed Sanction' Principle
    - Condition Precedent for Cognizance
    - Appellant's Actions in Official Capacity (ICC PO)