This data set spans the period from January 2024 to October 2025. It covers bail-related orders and verdicts of the Supreme Court under the Unlawful Activities (Prevention) Act, 1967, and the Prevention of Money Laundering Act, 2002. The data was collected and tabulated by Advocate Sarthak Gupta and was first published on the Supreme Court Observer website on 6 November 2025.

Name of case, date of decision, Bench (*-*Author*)	Brief facts, allegations, concerned Provisions (§)	Stage of trial at time of decision	Custody period	Bail or jail	Relevant portion of judgement
State of NCT (Delhi) v Raj Kumar @Lovepreet @Lovely 2024 INSC 11 3 January 2024 **Justice Vikram Nath*** + Justice Rajesh Bindal	Lovepreet has been charged under UAPA for terror-related activities; under the IPC for conspiracy and destruction of evidence; under the Arms Act for illegal possession and use of arms. An FIR was registered on 16.06.2020, leading to his arrest on 18.06.2020, with recoveries including arms sent for forensic examination and sanctions awaited from authorities. The Delhi HCt had granted bail on the ground the charge-sheet has not been filed	Trial has commenced.	Approx. five months	**Jail**	**Para 11** | "The High Court also fell in error in not taking into consideration the reasons given under section 43D(2)(b) were clearly made out and explained in the extension letter dated 07.11.2020 giving the details of the progress of the investigation as also the reasons for detaining the respondent. The Public Prosecutor had mentioned in the request that major investigation of the case had been completed and the draft chargesheet had been prepared. However, for want of remaining

	within the extended period. **IPC §:** 201 and 120B **UAPA §:** 13, 18, 20, 43D(2)(b), and 45(2) **Arms Act §:** 25, 39, 54, & 59				sanctions and FSL report some more time was required for completing the investigation." **Para 13** | "One more aspect to be considered is the nature of offence which involved terrorist activities having not only Pan India impact but also impact on other enemy States. The matter should not have been taken so lightly."
Gurwinder Singh v State of Punjab 2024 INSC 92 7 February 2024 **Justice Sundresh*** + Justice Aravind Kumar	The case against Gurwinder concerns an incident on 19 October 2018, where two individuals were apprehended for hanging banners promoting "Khalistan" and "Referendum 2020." The investigation by Punjab Police and later the NIA revealed the involvement of the accused in a module of the banned terrorist organization "Sikhs	At the time of decision, only 22 witnesses out of 109 witnesses had been examined.	Approx. 5 Years	**Jail**	**Para 32** | "Mere delay in trial pertaining to grave offences as one involved in the instant case cannot be used as a ground to grant bail. The material on record prima facie indicates the complicity of the accused as a part of the conspiracy since he was knowingly facilitating the commission of a preparatory act towards the commission of a terrorist act under section 18 of the UAPA."

	for Justice", which was receiving funds through illegal means to promote a separatist movement. The accused, including the appellant Gurwinder Singh, were implicated in attempts to procure weapons and engage in terror activities linked to this ideology. **IPC §:** 124A, 153A, 153B, 120-B of the IPC; **UAPA §:** 17, 18, 19 **Arms Act §:** 25 and 54				
Shoma Kanti Sen v. The State of Maharashtra & Anr. 2024 INSC 269 5 April 2024 **Justice Aniruddha**	The case against Shoma Kanti Sen is of alleged involvement in a larger conspiracy linked to the CPI (Maoist), a banned terrorist organisation, with accusations of participation in provocative speeches and meetings aimed at recruiting	Charges not framed at the time of decision	Almost 6 years	**Bail**	**Para 37 |** "….. a Constitutional Court is not strictly bound by the prohibitory provisions of grant of bail in the 1967 Act and can exercise its constitutional jurisdiction to release an accused on bail who has been incarcerated for a long period of time, relying on Article 21

Bose* and Justice Augustine George Masih.	individuals and raising funds for the organisation. **IPC §:** 153A, 505(1b), 117 read with 34, 120B, 121, 121A, 124A **UAPA §:** 13, 16, 17, 18, 18B, 20, 38, 39, 40				of Constitution of India." **Para 41** | "We have already indicated that she is a lady of advanced age, suffering from various ailments. The ailments by themselves may not be serious enough for granting bail on medical ground. But taking cognizance of the composite effect of delay in framing charge, period of detention undergone by her, the nature of allegations against her vis-à-vis the materials available before this Court at this stage in addition to her age and medical condition, we do not think she ought to be denied the privilege of being enlarged on bail pending further process subsequent to issue of chargesheets against her in the subject-case."
Prabhir Purkayastha v. State	The petitioner, Prabir Purkayastha, founding editor of NewsClick, was	At the time of decision, investigati	7 months	**Bail**	**Para 21** | "The Right to Life and Personal Liberty is the most sacrosanct

(NCT of Delhi) 2024 INSC 414 15 May 2024 Justice BR Gavai + **Justice Sandeep Mehta***	arrested by Delhi Police's Special Cell in October 2023 under UAPA. Allegations included receipt of foreign funds from Chinese entities routed via Neville Roy Singham to promote Chinese propaganda, destabilise India, and disrupt electoral process. It's also alleged that NewsClick published articles undermining India's sovereignty and integrity. **UAPA §:** 13, 16, 17, 18, 22C, 38, 39, & 40 **IPC §:** 153A, & 120B	on was competed; chargesheet was filed.			fundamental right guaranteed under Articles 20, 21 and 22 of the Constitution of India. Any attempt to encroach upon this fundamental right has been frowned upon by this Court in a catena of decisions." **Para 22** | "The right to be informed about the grounds of arrest flows from Article 22(1) of the Constitution of India and any infringement of this fundamental right would vitiate the process of arrest and remand. Mere fact that a charge sheet has been filed in the matter, would not validate the illegality and the unconstitutionality committed at the time of arresting the accused and the grant of initial police custody remand to the accused." **Para 27** | "From a holistic reading of various judgments

					pertaining to the law of preventive detention including the Constitution Bench decision of this Court in *Harikisan*, wherein, the provisions of Article 22(5) of the Constitution of India have been interpreted, we find that it has been the consistent view of this Court that the grounds on which the liberty of a citizen is curtailed, must be communicated in writing so as to enable him to seek remedial measures against the deprivation of liberty."
Ajay Ajit Peter Kerkar v. Directorate of Enforcement SLP (Crl) 6090 of 2024 16 May 2024 **Justice Abhay**	The case concerns Ajay Ajit Peter Kerkar, former promoter of the Cox & Kings Group (CKL), who was arrested by the ED on 27 November 2020 in connection with a bank fraud and alleged money laundering case arising from serious financial misconduct	Charges not framed at the time of decision	3 years, 6 months	**Bail**	**Para 5 |** "In the facts of the case, we find that there is no prospect of even the trial commencing, as the charge has not been framed. In these facts, we find that the appellant will be entitled to be enlarged on bail under section 436A of the CrPC on 27th May 2024. Hence, there is no need to

Oka* + Justice Ujjal Bhuyan	discovered during a forensic audit of CKL, which had been under insolvency since 2019. A CBI FIR had earlier been registered and the ED followed. Kerkar himself had filed complaints against the CFO and other CKL executives for financial wrongdoing. **PMLA §:** 3 and 4				have multiplicity of proceedings."
Union of India v. Barakathullah etc 2024 INSC 452 22 May 2025 **Justice Bela M Trivedi*** + Justice Pankaj Mithal	The Ministry of Home Affairs received credible information about Popular Front of India (PFI) and its frontal organisations spreading extremist ideology, recruiting youth, raising funds and conducting weapons training in Tamil Nadu. NIA registered an FIR on 19 September 2022. The respondents (PFI members/office	At the time of decision, chargesheet was filed before the Special NIA Court. The case was pending trial.	1 year 5 months	**Jail**	**Para 22** | "In the instant case, we are satisfied from the chargesheet as also the other material/documents relied upon by the appellant that there are reasonable grounds for believing that the accusations against the respondents are prima facie true and that the mandate contained in the proviso to Section 43(D)(5) would be applicable for not releasing the respondents on bail.

	bearers) were arrested on 22 September for offences under IPC and UAPA. The chargesheet alleged conspiracy to wage war, radicalisation, recruitment, and preparation for terrorist acts aimed at establishing Islamic rule in India by 2047. **IPC §:** 120B, 121A, 122, 153A, 505(1)(b), 505(1)(c), 505(2) **UAPA §:** 13, 17, 18, 18A, 18B, 38, 39 & 43D(5) **NIA Act §:** 6(5), 8				Having regard to the seriousness and gravity of the alleged offences, previous criminal history of the respondents as mentioned in the charge-sheet, the period of custody undergone by the respondents being hardly one and half years, the severity of punishment prescribed for the alleged offences and prima facie material collected during the course of investigation, the impugned order passed by the High Court cannot be sustained. We are conscious of the legal position that we should be slow in interfering with the order when the bail has been granted by the High Court, however it is equally well settled that if such order of granting bail is found to be illegal and perverse, it must be set aside."

					Para 23 | "This Court has often interpreted the counter terrorism enactments to strike a balance between the civil liberties of the accused, human rights of the victims and compelling interest of the state. It cannot be denied that National security is always of paramount importance and any act in aid to any terrorist act – violent or non-violent is liable to be restricted. The UAPA is one of such Acts which has been enacted to provide for effective prevention of certain unlawful activities of individuals and associations, and to deal with terrorist activities, as also to impose reasonable restrictions on the civil liberties of the persons in the interest of sovereignty and integrity of India."
Javed Gulam Nabi	On 9 February, 2020, Javed Gulam Nabi was	At the time of decision,	Approx. 4 years	**Bail**	**Para 19** | "If the State or any prosecuting agency

Shaikh v. Union of India 2024 INSC 646 3 July 2024 **Justice JB Pardiwala*** + Justice Ujjal Bhuyan	apprehended by Mumbai Police at the Chhatrapati Shivaji Maharaj International Airport, where 1,193 counterfeit Indian currency notes of ₹2,000 denomination were found in his possession. The case, involving the smuggling of counterfeit notes from Pakistan, was taken over by the NIA. **IPC:** 489B, 489C, 120B read with 34 **UAPA §:** 15 (1) (a) (iiia), 16 and 18	chargesheet was filed but trial was yet to commence.			including the court concerned has no wherewithal to provide or protect the fundamental right of an accused to have a speedy trial as enshrined under Article 21 of the Constitution then the State or any other prosecuting agency should not oppose the plea for bail on the ground that the crime committed is serious. Article 21 of the Constitution applies irrespective of the nature of the crime." **Para 20 |** "We may hasten to add that the petitioner is still an accused; not a convict. The over-arching postulate of criminal jurisprudence that an accused is presumed to be innocent until proven guilty cannot be brushed aside lightly, howsoever stringent the penal law may be."

Arvind Kejriwal v. ED 2024 INSC 512 12 July 2024 **Justice Sanjiv Khanna*** + Justice Dipankar Datta	Arvind Kejriwal was arrested by the ED based on allegations of irregularities in Delhi's Excise Policy. **IPC** §: 120B read with 477A **PMLA**§: 19 **PC Act** §: 7	–	6 Months	**Bail**	**Para 16 |** "The right to life and personal liberty is sacrosanct, a fundamental right guaranteed under Article 21 and protected by Articles 20 and 22 of the Constitution."
Sheikh Javed Iqbal @Ashaq Ansari @Javed Ansari v. State of Uttar Pradesh 2024 INSC 534 18 July 2024 Justice JB Pardiwala + **Justice Ujjal Bhyuan***	The case against the appellant is that he was caught with counterfeit Indian currency worth over ₹26 lakh near the Indo-Nepal border, along with Nepalese identity documents and mobile phones, and allegedly confessed to being engaged in the illegal trade of supplying fake currency. He was charged under IPC provisions for counterfeit currency and conspiracy, and additionally under UAPA for terrorist activity, with sanction orders	At the time of decision, only two witnesses had been examined.	9 Years	**Bail**	**Para 22 |** "It is trite law that an accused is entitled to a speedy trial. This Court in a catena of judgments has held that an accused or an undertrial has a fundamental right to speedy trial which is traceable to Article 21 of the Constitution of India. If the alleged offence is a serious one, it is all the more necessary for the prosecution to ensure that the trial is concluded expeditiously. When a trial gets prolonged, it is not open to the prosecution to

	later issued by the State Government to prosecute him. **IPC §:** 121A, 489B, 489C **UAPA §:** 16, § 45(2)				oppose bail of the accused-undertrial on the ground that the charges are very serious. Bail cannot be denied only on the ground that the charges are very serious though there is no end in sight for the trial to conclude." **Para 29** | "Going back to *K.A. Najeeb*, this Court thereafter proceeded to hold that Section 43D(5) of UAPA does not oust the ability of the constitutional courts to grant bail on grounds of violation of Part III of the Constitution. Long incarceration with the unlikelihood of the trial being completed in the near future is a good ground to grant bail….." **Para 32** | "This Court has, time and again, emphasized that right to life and personal liberty enshrined under Article 21 of the

					Constitution of India is overarching and sacrosanct. A constitutional court cannot be restrained from granting bail to an accused on account of restrictive statutory provisions in a penal statute if it finds that the right of the accused-undertrial under Article 21 of the Constitution of India has been infringed. In that event, such statutory restrictions would not come in the way. Even in the case of interpretation of a penal statute, howsoever stringent it may be, a constitutional court has to lean in favour of constitutionalism and the rule of law of which liberty is an intrinsic part. In the given facts of a particular case, a constitutional court may decline to grant bail. But it would be very wrong to say that under a particular statute, bail cannot be granted. It would

					run counter to the very grain of our constitutional jurisprudence. In any view of the matter, K.A. Najeeb (supra) being rendered by a three Judge Bench is binding on a Bench of two Judges like us."
Parvinder Singh Khurana v. ED 2024 INSC 546 23 July 2024 **Justice Abay Oka*** + Justice Augustine Geroge Masih	On 1 December 2020, the CBI registered a case against two companies and two individuals for offences including fraud and corruption, related to a loan account of Jay Polychem India Ltd. On 23 February 2021, the ED initiated an ECIR under the PMLA, naming eleven accused but not including Parvinder Singh. Despite cooperating with investigations from October 2020 to January 2023, Parvinder Singh was arrested on 20 January 2023.	**N/A**	1 Year 5 Months	**Bail**	**Para 17 |** "There may be good reasons for three learned Judges to have recused themselves. But surely, the exparte order staying the order of bail passed without considering merits cannot continue to operate for one year without the appellant getting a hearing on the issue of continuation of the interim order. All Courts have to be sensitive about the most important fundamental right conferred under our Constitution, which is the right to liberty under Article 21."

	IPC §: 120B read with 420, 467, 468, and 471 **PC Act §:** 13(2) read with **PMLA §:** 13(1)(d) and § 44(1)(b)				
Humayun Suleman Merchant v. ED SLP (Crl) 4321 of 2024 29 July 2024 **Justice Sanjiv Khanna* +** Justice Sanjay Kumar	The case against Humayun Suleman Merchant (A-10) is that he laundered proceeds of crime for gangster Iqbal Mirchi, an aide of Dawood Ibrahim. The ED alleges he acted as a frontman in Worli property deals (Sea View, Marium Lodge, Rabia Mansion), using relatives as dummy tenants to conceal ownership and layer illicit funds. Though not directly charged with any scheduled offence, the laundered money is traced to NDPS, IPC and Arms Act offences, attracting liability under PMLA. **PMLA §:** 3 and 4	**N/A**	4 Years and 9 Months	**Bail**	**Page 1 |** "Having regard to the fact that the appellant, Humayun Suleman Merchant, is more than 75 years of age and has already suffered actual incarceration for four years and nine months, we accept the present appeal and direct that the appellant, Humayun Suleman Merchant, will be released on bail during the pendency of trial"

Ramkripal Meena v. ED SLP (Crl) No(s). 3205/2024 30 July 2024 **Justice Surya Kant*** + Justice Ujjal Bhuyan	Ramkripal Meena is accused of involvement in the leak of the REET 2021 exam paper. As a school manager and assistant to the exam coordinator, he allegedly leaked the question paper and was to receive a bribe of Rs. 5 crores, of which Rs. 1,77,80,000 was recovered, including Rs. 46,00,000 from the petitioner. He was arrested on 26 January 2022, but was granted bail on 18 January 2023 under conditions that included the attachment of his immovable properties. **IPC §:** 406, 420, 120B **Rajasthan Public Examination (Prevention of Unfair Means) Act, 1992 §:** 4 and 6	At the stage of framing of charges, wherein 24 witnesses are proposed to be examined.	More than 1 year	**Bail**	**Para 7 |** "…..Taking into consideration the period spent in custody and there is no likelihood of conclusion of trial within a short span, coupled with the fact that the petitioner is already on bail in the predicate offence, and keeping in view the peculiar facts and circumstances of this case, it seems to us that the rigours of Section 45 of the Act can be suitably relaxed to afford conditional liberty to the petitioner."

Manish Sisodia v. ED 2024 INSC 595 9 August 2024 **Justice BR Gavai* +** Justice KV Vishwanathan	Manish Sisodia was arrested by the CBI on 26 February 2023 and by the ED on 9 March 2023, following allegations of irregularities in Delhi's Excise Policy for 2021-22. The CBI charged him under various provisions of the Prevention of Corruption Act and IPC, while the ED filed a complaint under the PMLA. His initial bail applications were rejected by both the High Court and Supreme Court, with subsequent bail applications also denied. The appellant's recent appeals challenge these decisions following the filing of the final chargesheet. **IPC §:** 420, 201, & 201 **PC Act §:** 7, 7A, 8 & 12	At the time of decision, 493 witnesses had been named. The case involved thousands of pages of documents and over a lakh pages of digitised documents.	1 year, 6 months	**Bail**	**Para 53 |** "The Court further observed that, over a period of time, the trial courts and the High Courts have forgotten a very well-settled principle of law that bail is not to be withheld as a punishment. From our experience, we can say that it appears that the trial courts and the High Courts attempt to play safe in matters of grant of bail. The principle that bail is a rule and refusal is an exception is, at times, followed in breach. On account of non-grant of bail even in straight forward open and shut cases, this Court is flooded with huge number of bail petitions thereby adding to the huge pendency. It is high time that the trial courts and the High Courts should recognise the principle that "bail is rule and jail is exception".

	PMLA §: 3				
Bhagwan Bhagat v. Directorate of Enforcement SLP (Crl) No. 6905 of 2024 12 August, 2024 Justice Abhay Oka* and Justice Augustine Masih	The case against Bhagwan Bhagat arises from an investigation initiated under PMLA, based on an FIR relating to the Barharwa Toll tender in Sahebganj, Jharkhand. The primary accused, Pankaj Mishra, allegedly enjoying political clout as a representative of the Jharkhand Chief Minister, is accused of orchestrating attacks and threatening individuals to control toll operations and engaging in widespread illegal mining and levy collection from vehicles transporting stone chips. **IPC §:** 120B **PMLA §:** 3 & 4	N/A	1 Year	**Bail**	**Page 2** | "On a plain reading of these two complaints, prima facie, we are satisfied that there are reasonable grounds for believing that the complaints do not indicate that the appellants are guilty of offence of money-laundering. We may also note here that nothing is pleaded to show that the appellants are involved in any other offence of money-laundering under the PMLA. Allegation of tampering with the evidence have not been made. Both the appellants have undergone incarceration for a period of about 1 year approximately."
Jalaluddin Khan v.	The case against Jalauddin is that he	**-**	2 years, 1 month	**Bail**	

Union of India | 2024 INSC 604 13 August 2024 **Justice Abay Oka*** + Justice Augustine Masih	is alleged to be involved with the Popular Front of India (PFI). The chargesheet accuses him of renting out a portion of his property, Ahmad Palace, to Athar Parwez, co-accused linked to PFI activities. **IPC §:** 121, 121A, and 122 of the IPC **UAPA§:** 13, 18, 18A, and 20				**Para 21** | "…….The Special Court and the High Court did not consider the material in the charge sheet objectively. Perhaps the focus was more on the activities of PFI, and therefore, the appellant's case could not be properly appreciated. When a case is made out for a grant of bail, the Courts should not have any hesitation in granting bail. The allegations of the prosecution may be very serious. But, the duty of the Courts is to consider the case for grant of bail in accordance with the law. "Bail is the rule and jail is an exception" is a settled law. Even in a case like the present case where there are stringent conditions for the grant of bail in the relevant statutes, the same rule holds good with only modification that the bail can be granted if the conditions in the

					statute are satisfied. The rule also means that once a case is made out for the grant of bail, the Court cannot decline to grant bail. If the Courts start denying bail in deserving cases, it will be a violation of the rights guaranteed under Article 21 of our Constitution.
Kalvakuntla Kavitha v. ED 2024 INSC 632 27 August 2024 **Justice BR Gavai*** + Justice KV Vishwanathan	The case against K. Kavitha pertains to her alleged involvement in the Delhi Excise Policy scam of 2021–22, wherein the CBI and ED allege a criminal conspiracy involving public officials and liquor industry players to manipulate the policy for personal gain. According to the CBI, kickbacks worth ₹90–100 crores were paid by the "South Group" of liquor businessmen to officials including Vijay Nair and Manish Sisodia, to secure undue	There are about 493 witnesses to be examined. The documents to be considered are in the range of about 50,000 pages.	5 months, 12 days	**Bail**	**Para 13** | "We had also reiterated the well-established principle that "bail is the rule and refusal is an exception". We had further observed that the fundamental right of liberty provided under Article 21 of the Constitution is superior to the statutory restrictions ……. We are further of the view that the proviso to Section 45(1) of the PMLA would entitle a woman for special treatment while her prayer for bail is being considered. **Para 22** | "We find that the learned

	benefits in the excise regime, forming a cartel among manufacturers, wholesalers, and retailers. Kavitha is accused of being a partner in M/s Indo Spirits, an L-1 liquor wholesaler, through her proxy Arun Ramchandran Pillai. Despite being summoned for questioning, she initially did not cooperate with the CBI, leading to her arrest by the ED. **IPC §:** 120B & 477A **PMLA §:** 3 & 4 **PC Act §:** 7, 7A, & 8				Single Judge erroneously observed that the proviso to Section 45(1) of the PMLA is applicable only to a "vulnerable woman".
Prem Prakash v. Union of India 2024 INSC 637 28 August 2024	The case against Prem Prakash is that he is accused of being involved in a conspiracy related to the fraudulent acquisition and sale of a piece of land. The predicate offence, registered as an FIR, involves allegations of	The trial is yet to commence . There is a reference to one more ECIR which the Investigating Agency refers to in their	More than 1 Year	**Bail**	**Para 11** | "All that Section 45 of PMLA mentions is that certain conditions are to be satisfied. The principle that, "bail is the rule and jail is the exception" is only a paraphrasing of Article 21 of the Constitution of India, which states

Justice Gavai + **Justice Vishwanathan***	forgery and fraudulent transactions concerning the land. The ED's investigation revealed that the appellant was implicated in falsifying records and handling illicit proceeds from the land transactions. The appellant, named in the PMLA case as having beneficial ownership of Jamini Enterprises, was arrested on 11 August 2023. His bail application was rejected by both the Special Judge and the High Court. **IPC §:** 120-B, 406, 420, 467, 465, 468, 471, 447, 504, 506, 341, 323 and 34 **PMLA §:** 3 & 4	counter but nothing is available from the record as to whether any proceedings have been taken against the appellant.			that no person shall be deprived of his life or personal liberty except according to the procedure established by law. Liberty of the individual is always a Rule and deprivation is the exception. Deprivation can only be by the procedure established by 10 law, which has to be a valid and reasonable procedure. Section 45 of PMLA by imposing twin conditions does not re-write this principle to mean that deprivation is the norm and liberty is the exception. As set out earlier, all that is required is that in cases where bail is subject to the satisfaction of twin conditions, those conditions must be satisfied. **Para 34** | "In view of the above and keeping the salutary principle of Article

					21 in mind, we hold that since the words 'procedure established by law' occurring in Article 21 has to be a reasonable and valid procedure."
Mukesh Salam v. State of Chattisgarh SLP (CrL) No(s). 3655/2024 30 August 2024 Chief Justice Chandrachud + Justice JB Pardiwala + Justice Manoj Mishra)	On 24.03.2020, Tapas Kumar Palit was found transporting various materials, including shoes and electric wires, which were allegedly intended for Naxalites to support their activities. He claimed these were supplied on the instructions of Ajay Jain and Komal Verma, who were subcontractors for a road construction project. The prosecution alleges that appellants Mukesh Salam and Rajendra Salam were involved in this scheme, with Mukesh Salam being in direct contact with a Naxalite commander and Rajendra Salam assisting in the	Though the number of witnesses cited at the trial stands reduced from 114 prosecution witnesses to 100, as of date only 40 witnesses have been examined.	3 years, 8 months	**Bail**	**Para 4** | ".....12 out of 14 persons who are arraigned as accused have been granted bail either by the order of the High Court." **Para 5** | "Bearing in mind the above circumstances and the nature of the alleged case, we are of the considered view that the continued detention of the petitioner would not subserve the ends of justice. There is no likelihood of the early conclusion of the trial. The petitioner is in custody since 6 May 2020. We accordingly order and direct that the petitioner be released on bail, subject to such terms and conditions as may be imposed by

	logistics and delivery of materials. Both appellants were implicated through their communication and involvement in the supply chain to Naxalites. [Facts, HCt Order] **IPC §:** 120B, 201 & 149/34 **UAPA §:** 10, 13, 17, 38(1)(2), 40, 22-A and 22-C **Chhattisgarh Vishesh Jan Suraksha Adhiniyam, 2005 §:** 8(2)(3)(5)				the Special Judge (NIA Act), Kanker, in connection with FIR No 9 of 2020."
Vijay Nair v. ED SLP (CrL)No(s). 22137/2024 2 September 2024 Justice Roy + Justice Bhatti	The accused is alleged to have acted as a middleman and was involved in irregularities in framing and implementing the Delhi Excise policy. **PMLA §:** 3 & 4	The prosecution has to examine around 350 witnesses. Around 40 persons have been arrayed as accused in the proceedings, and documents filed by the	1 Year 10 months	**Bail**	**Para 10 |** "The right of liberty guaranteed under Article 21 of the Constitution is a sacrosanct right that needs to be respected even in cases where stringent provisions are incorporated in the special enactments. In the case at hand, the petitioner has been in custody for over 22 months and his incarceration as an

		ED run into over 25,000 pages.			under-trial cannot be the mode of punishment in the case.”
Neeraj Singhal v. ED SLP (Crl.) No. 8439-8440 of 2024 6 September 2019 **Justice Sanjiv Khanna*** + Justice Sanjay Kumar	The case against Neeraj Singhal, ex-promoter and Managing Director of Bhushan Steel Ltd (BSL), concerns his alleged role in one of India’s largest banking frauds, resulting in a loss of over ₹46,000 crores. Before BSL's acquisition by Tata Steel under IBC proceedings, the Ministry of Corporate Affairs ordered an SFIO probe into BSL's affairs, leading to charges under various sections of the Companies Act and IPC for fraud and forgery. The ED later registered a money laundering case under PMLA, alleging that Singhal, along with others, illegitimately obtained loan funds in the name	Trial has effectively not commenced	1 Year 4 months	**Bail**	**Page 1 |** “Keeping in view the period of incarceration undergone by the appellant, Neeraj Singal, and as the trial has effectively not commenced, we accept the present appeals.”

	of BSL and group companies and laundered them through a web of over 150 shell entities. **IPC §:** 467, 471 and 120B **PMLA §:** 3 & 4 **Companies Act §:** 447				
Arvind Kejriwal v. Union of India 2024 INSC 687 13 September 2024 **Justice Surya Kant* + Justice Ujjal Bhuyan**** There were 2 different opinions.	Kejriwal was initially not named in the FIR registered by the CBI on 17.08.2022 regarding alleged irregularities in the 2021-2022 Excise Policy. However, he was arrested by the ED on 21.03.2024 under the Prevention of Money Laundering Act. Following his release on interim bail, the CBI arrested him on 26.06.2024 in connection with their investigation. **IPC §:** 120B read with 477A **PMLA §:** 3 & 4	At the time of decision, 17 accused persons have been named, 224 individuals have been identified as witnesses, and extensive documentation, both physical and digital, has been submitted. These factors suggest that the completio	Approx. 3 months	**Bail**	**Justice Kant's Opinion** **Para 40 |** "In our considered view, although the procedure for the Appellant's arrest meets the requisite criteria for legality and compliance, continued incarceration for an extended period pending trial would infringe upon established legal principles and the Appellant's right to liberty, traceable to Article 21 of our Constitution. The Appellant has been granted interim bail by this Court in the ED matter on 10.05.2024 and 12.07.2024, arising

	PC Act §: 7	n of the trial is unlikely to occur in the immediate future.			from the same set of facts. Additionally, several co-accused in both the CBI and ED matters have also been granted bail by the Trial Court, the High Court, and this Court in separate proceedings." **Justice Bhuyan's Opinion:** **Para 28 |** "Investigation should be conducted in a manner so as to draw a just balance between a citizen's right under Articles 19 and 21 of the Constitution of India and the expansive power of the police to make investigation. Concept of fair investigation and fair trial are concomitant to preservation of the fundamental right of the accused under Article 21 of the Constitution of India." **Para 40 |** "Bail jurisprudence is a

					facet of a civilised criminal justice system. An accused is innocent until proven guilty by a competent court following the due process. Hence, there is presumption of innocence. Therefore, this Court has been reiterating again and again the salutary principle that bail is the rule and jail is the exception. As such, the courts at all levels must ensure that the process leading to and including the trial does not end up becoming the punishment itself."
Modh. Enamul Haque v The Directorate of Enforcement SLP (Crl) No.11129/2024 23 September, 2024	The case against Mohd. Enamul Haque involves serious allegations of organized cattle smuggling across the Indo-Bangladesh border, protected through bribes paid to BSF and Customs officials. The CBI registered an FIR alleging that Haque, with others, conspired to	Trial is yet to commence. There are 85 witnesses.	More than 4 Years	**Bail**	**Para 5 |** "The appellant has been incarcerated for more than 2.5 years in the present case. Thus, even if we leave out any period of incarceration undergone in a predicate offence, a continued incarceration where the appellant is not entirely at fault for the completion of trial due to a

Justice MM Sundresh* + Justice Aravind Kumar	illegally procure and export seized cattle, generating substantial proceeds of crime. The ED later registered a money laundering case under the PMLA, accusing Haque of paying ₹12.8 crores in bribes to BSF Commandant Satish Kumar via a handler, Manoj Sana, and also of laundering ₹6.1 crores through shell companies and hawala channels linked to bogus exports. Haque's group companies like Hoque Mercantile Pvt. Ltd. showed sudden, disproportionate turnover growth allegedly funded by illegal proceeds. He is also accused of using laundered money to purchase property in New Delhi and maintain business links with the JHM Group, with both groups engaging in bogus				prolonged delay, would enure to his benefit for the purpose of granting bail.

	billing and accommodation entries to layer the illicit funds. **IPC §:** 120B **PMLA §:** 3, 4, **PC Act §:** 7, 11, 12				
V. Senthil Balaji v. The Deputy Director, Directorate of Enforcement 2024 INSC 739 **Justice Abay Oka*** + Justice Augustine Masih	Between 2011 and 2016, the appellant, then Transport Minister of Tamil Nadu, allegedly collected large sums in connivance with his personal assistant and brother by promising jobs in the Transport Department. This led to three FIRs. **IPC §:** 120B, 419, 420, 467, 471 **PMLA §:** 3 and 4	In the first FIR, six chargesheets have been filed, naming over 2,000 accused and 550 witnesses. The second FIR involves 14 accused and 24 witnesses, while the third FIR lists 24 accused and 50 prosecution witnesses.	1 Year, 3 months	**Bail**	**Para 26 |** "There are a series of decisions of this Court starting from the decision in the case of *K.A. Najeeb*, which hold that such stringent provisions for the grant of bail do not take away the power of Constitutional Courts to grant bail on the grounds of violation of Part III of the Constitution of India. We have already referred to paragraph 17 of the said decision, which lays down that the rigours of such provisions will melt down where there is no likelihood of trial being completed in a reasonable time and the period of incarceration already undergone has exceeded a substantial part of

					the prescribed sentence. One of the reasons is that if, because of such provisions, incarceration of an undertrial accused is continued for an unreasonably long time, the provisions may be exposed to the vice of being violative of Article 21 of the Constitution of India." **Para 28 |** "Someday, the courts, especially the Constitutional Courts, will have to take a call on a peculiar situation that arises in our justice delivery system. There are cases where clean acquittal is granted by the criminal courts to the accused after very long incarceration as an undertrial. When we say clean acquittal, we are excluding the cases where the witnesses have turned hostile or there is a bona fide defective

					investigation. In such cases of clean acquittal, crucial years in the life of the accused are lost. In a given case, it may amount to violation of rights of the accused under Article 21 of the Constitution which may give rise to a claim for compensation." **Para 29** | "As stated earlier, the appellant has been incarcerated for 15 months or more for the offence punishable under the PMLA. In the facts of the case, the trial of the scheduled offences and, consequently, the PMLA offence is not likely to be completed in three to four years or even more. If the appellant's detention is continued, it will amount to an infringement of his fundamental right under Article 21 of the Constitution of India of speedy trial."

Laxmikant Tiwari v. Directorate of Enforcement Criminal Appeal No. 4142 OF 2024 4 October, 2024 **Justice Abay Oka*** + Justice Augustine Masih	The case against Laxmikant Tiwari arises out of an ED report filed under PMLA, linked to an FIR initially registered on 12 July 2022 at Kadugodi Police Station, Bangalore. However, at the time the ED filed its complaint under Section 44 of PMLA, no scheduled offence under the PMLA existed. In fact, the original chargesheet filed on 8 June 2023 did not include any scheduled offence, as Section 120-B IPC alone (without a conspiracy to commit a scheduled offence) does not qualify. A separate FIR under Section 384 IPC was filed in Chhattisgarh on 17 January 2024, and a corresponding chargesheet was filed only on 19 July 2024, after the ED's complaint.	N/A	1 Year 9 Months	**Bail**	**Page 3** |"Considering the long period of incarceration and considering the peculiar fact of these appeals, continuation of custody of the appellants will be violation of their right under Article 21 of the Constitution of India. Hence, the appellants are entitled to be enlarged on bail for the offence punishable under Section 4 of the PMLA Act."

	IPC §: 186, 204, 353, 120B, and 384 **PMLA §:** 3, 4, and 44				
Union Territory of Jammu Kashmir v. Peerzada Shah Fahad Diary No. 26689 of 2024 14 October, 2024 **Justice Bela M Trivedi*** + Justice Satish Chandra Sharma	The case against Peerzada Shah is that he was allegedly involved in unlawful activities attracting provisions of UAPA, IPC, and FCRA, including promoting secessionist ideology and receiving foreign contributions in violation of law. It was alleged that he published an incendiary article in November 2011 on his portal, *The Kashmir Walla*. He was earlier arrested in multiple FIRs on similar allegations, granted bail in each, but was not released and instead kept in custody through successive FIRs. Eventually, he was booked under preventive detention, with the	N/A	N/A	**Bail** (affirmed)	**Para 5** | ".. we are not inclined to interfere with the impugned order, having regard to the fact that the respondent is on bail since last about one year and since the trial has already commenced." **Para 6** | "Suffice it to say that having regard to the aforestated judgments of the Constitution Benches, it is directed that the impugned judgment and order being per incuriam shall not be cited as a precedent in any other case. It is also needless to say that any breach of conditions of bail or non-cooperation of the respondent in proceeding with the trial shall entail cancellation of his bail."

	prosecution alleging his role in activities prejudicial to the sovereignty and integrity of the nation. **UAPA §:** 13 **FCR Act §:** 35 and 36 **J&K Public Safety Act :** **NIA Act §:**21				
Badshah Majid Malik v. ED SLP (Crl) No. 10846/2024 18 October, 2024 **Justice Abhay Oka*** + Justice Augustine George Masih	The case against the applicant arises from his alleged role as the kingpin of an organised red sanders smuggling syndicate. The Directorate of Revenue Intelligence (DRI) initiated a prosecution in 2017 after intercepting and seizing 7.8 metric tons of red sanders valued at ₹3.12 crores from a container falsely declared as carrying fabric glue and other goods, based on forged documents from	N/A	1.5 Years	**Bail**	**Page 3 & 4 |** "In the facts of the case, it is not disputed that the appellant has not been convicted for any offence in the past. Therefore, the first proviso to sub-section (1) of Section 479 of the BNSS will apply to this case as admittedly, the appellant has undergone detention for a period of more than 1/3rd of the maximum period of imprisonment provided for the offence alleged against him.

	SEZ units. Further investigation revealed the syndicate had already smuggled 17 such consignments worth ₹48 crores to the UAE and Africa. The applicant, previously detained under COFEPOSA in 2005 for duty drawback fraud, resumed smuggling in 2014 and coordinated with associates, including Vijay Subbanna Poojary, to orchestrate the operations. The ED later registered an ECIR under the PMLA, citing money laundering of proceeds from these smuggling activities. **Custom Act §:** 132, 135(1)(a)(ii), 135(1)(b)(ii) read with 140 **PMLA §:** 3, and 4				However, it is not in dispute that the maximum sentence for the scheduled offence under Sections 132, 135(1)(a)(ii) and 135(1)(b)(ii) read with Section 140 of the Customs Act, 1862 is three years."
State of Punjab v. Sukhwinder Singh	The case against Sukhwinder Singh @ Sukha arises out of the Jalalabad	-	4 years, 10 months, 27 days	**Jail**	**Para 10** | "Therefore, looking at the timeline and the facts of the case,

Criminal Appeal 4547 of 2024 **12 November, 2024**	bomb blast (FIR No. 205/2021) and the subsequent FIR No. 181/2021. He was arrested on 12.11.2021 for allegedly providing shelter and assistance to the accused involved in the bomb blast, thereby facilitating their unlawful activities. **IPC §:** 212 & 216 **UAPA §:** 18 and 19				it is sufficiently clear that on the date of preferring application for default bail i.e. 02.09.2022, no such right sustained as the challan had already been filed. The benefit of default bail can only be conferred before a chargesheet is filed, which was not applicable in this case. Therefore, the High Court had wrongly granted such benefit to the accused-Respondents by blatantly ignoring the fact of presentation of chargesheet being much prior in time to the application for default bail."
Zeeshan Haider v. Directorate Of Enforcement SLP (CrL) No. No.9374 of 2024	The case stems from multiple predicate offences linked to Amanatullah Khan, an MLA of Delhi, and others, including the then CEO of the Delhi Waqf Board, Mahboob Alam. The initial FIR (No. 9(A)/2016) was registered by the	At the time of decision, charge has not been framed in a complaint filed under the PMLA. In the complaint, 29	1 Year 1 Month	**Bail**	**Para 9 |** "We have carefully perused the observations made by the Special Court. It is well settled that a Public Prosecutor has to be fair. If a case is covered by a binding precedent, it is his duty to point out the said aspect to the Court. Perhaps what the learned Judge

11 December, 2024 Justice Abhay Oka + Justice Ujjal Bhuyan	CBI for conspiracy and corruption under the IPC and the Prevention of Corruption Act. Subsequently, three additional FIRs were clubbed under ECIR No. DLZO-I/35/2022: one for bribery under the PC Act and IPC, and two for Arms Act violations. After investigation, the Directorate of Enforcement filed a prosecution complaint under Sections 3 and 4 of the PMLA against Zeeshan Haider, Daud Nasir, Jawed Imam Siddiqui, Kausar Imam Siddiqui, and M/s Sky Powers, a firm allegedly controlled by Zeeshan Haider, for laundering proceeds of crime arising from these offences. The Directorate of Enforcement alleges that Amanatullah Khan, MLA and Chairman of the	witnesses have been cited and about 50 documents are relied upon which run into 4000 pages approxima tely.			intended to was that when the Public Prosecutor is satisfied that the trial has been delayed on account of default or conduct on the part of Enforcement Directorate, the Public Prosecutor should take a fair stand. However, the aforesaid observations will not prevent Public Prosecutors from opposing a bail petition on the ground that act or omissions on the part of Enforcement Directorate are not responsible for the delay of trial. Therefore, this order cannot be read to mean that the Public Prosecutors are not entitled to oppose the bail petitions. We may also note that the Enforcement Directorate or its Director can give instructions to a Public Prosecutor on facts of the case. However, Enforcement

	Delhi Waqf Board, amassed proceeds of crime through corruption and misused them to purchase properties in conspiracy with Zeeshan Haider and others. Zeeshan allegedly paid ₹12.80 crores, ₹8.90 crores in cash and ₹3.90 crores via banking channels, for acquiring two plots through the firm M/s Sky Powers, despite his and the firm's negligible declared income. He is accused of acting as a benamidar to conceal the illicit funds of Amanatullah Khan and laundering them through a fabricated sale agreement, thereby being actively involved in concealing and using proceeds of crime. **PMLA §**: 3 & 4				Directorate or its Director cannot give any directions or instructions to the Public Prosecutor about what he ought to do or ought not to do before the Court as an officer of the Court."
Partha Chatterjee v. Directorate	The case against Partha Chatterjee, former West Bengal Education Minister,	At the time of decision, trial had	2 + Years	**Bail**	**Para 13** | "We have considered the rival submissions and carefully examined

of Enforcement 2024 INSC 975 13 December, 2024 **Justice Surya Kant*** and Justice Ujjal Bhuyan	stems from allegations of large-scale corruption and money laundering linked to irregularities in teacher recruitment during his tenure. Following writ petitions alleging corrupt practices in the Teachers Eligibility Test (TET), the Calcutta High Court ordered a CBI probe, which led to the registration of a predicate FIR for offences under the IPC and Prevention of Corruption Act. The Enforcement Directorate subsequently launched a money laundering investigation and conducted raids at Chatterjee's premises, recovering incriminating documents, ₹49.80 crores in cash, and gold worth several crores from properties linked to his close aide and companies	not begun. There are 442 documents and 183 witnesses to be examined.			the material on record. At the outset, it is worth reiterating that this Court, through a catena of decisions, has consistently emphasized that prolonged incarceration of an accused awaiting trial unjustly deprives them of their right to personal liberty. Even statutory embargoes on the grant of bail must yield when weighed against the paramount importance of the right to life and liberty under Article 21 of the Constitution, particularly in cases where such incarceration extends over an unreasonably long period without conclusion of trial." **Para 14** | "Equally well-established is the principle that the grant of bail must be determined based on the unique circumstances of

	allegedly controlled by him through dummy directors. **IPC §:** 120B, 420, 467, 468, 471 and 34 **PMLA §:** 4 **PC Act §:** 7, 7A and 8				each case, balanced against settled factors such as the gravity of the offence, the nature of the allegations, likelihood of interference with the ongoing investigation, the possibility of evidence tampering, threat or influence over the material witnesses, the societal impact of such release, and the risk of the accused absconding among others."
Athar Parwez v. Union of India Criminal Appeal No. 5387 of 2024 17 December 2024 Justice Abhay S. Oka and Justice Augustine George Masih	The allegations against an active member of the Popular Front of India (PFI) *inter alia* include: - planning to cause disturbance during the proposed visit of Prime Minister to Patna - Alleged to possess documents including "India 2047 towards rule of Islam in India, internal Document not for circulation";	At the time of decision, charges not yet framed despite chargesheet being filed on 7 January 2023. 40 accused and 354 witnesses cited by prosecution Trial unlikely to conclude soon	2 years and 4 months	**Bail**	**Para 27 |** "The Court had further gone to the extent of saying and rightly so that in the chargesheet there is no allegation that the Appellant was a member of a terrorist gang or organisation. It is worth mentioning here that the PFI of which the Appellant was a member has not been declared a terrorist organisation within the meaning of Section 2(m) of the UAPA, 1967."

	- alleged participation in organising meetings on 29 May 2022 and 6-7 July 2022; and - accused of participating in protests with communal sloganeering. **IPC §:** 120, 120-A, 121, 121A, 122, 153A, 153B, & 34 **UAPA §:** 13, 17, 18, 18A, 18B & 20				**Para 32** | "The Appellant was arrested on 12.07.2022. He has undergone custody for more than two years and four months. Chargesheet was filed on 07.01.2023 but till date charges have not been framed which is an admitted position. There are 40 accused and 354 witnesses cited by the prosecution to be examined. There can be no doubt that the trial is not likely to complete soon, and as has been laid down by various judgments of this Court as has been referred to above, the Appellant cannot be allowed to languish in jail indefinitely and that too without a trial. If such an approach is allowed Article 21 of the Constitution of India would stand violated." **Para 33** | "When a case is made out for

					a grant of bail, the Courts should not have any hesitation in granting bail. The allegations of the prosecution may be very serious. But, the duty of the Courts is to consider the case for grant of bail in accordance with the law... If the Courts start denying bail in deserving cases, it will be a violation of the rights guaranteed under Article 21 of our Constitution."

Directorate of Enforcement v. Subhash Sharma 2025 INSC 141 21 January 2025 **Justice Abhay Oka*** + Justice Ujjay Bhuyan	The case against the respondent is that he was apprehended at IGI Airport pursuant to a Look Out Circular issued at the instance of the ED. He was detained by immigration authorities and later taken into custody by the ED in connection with allegations of money laundering. The allegation is that he was involved in laundering proceeds of crime generated through unlawful activities. **PMLA §:** 14	At the time of decision, trial is yet to commence .	1 Month	**Bail** (affirmed)	**Para 6** | "The perusal of the arrest order(Annexure p-1) shows that the typed order was kept ready. The date and time of arrest were kept blank which appear to have been filled in by hand. Admittedly, the respondent was not produced before the nearest learned Magistrate within 24 hours from 11.00 a.m. on 5th March, 2022. Therefore, the arrest of the respondent is rendered completely illegal as a result of the violation of clause 2 of Article 22 of the Constitution of India. Thus, the continuation of the respondent in custody without producing him before the nearest Magistrate within the stipulated time of 24 hours is completely illegal and it infringes fundamental rights under clause 2 of Article 22 of the Constitution of India. Therefore, his

					arrest gets vitiated on completion of 24 hours in custody. Since there is a violation of Article 22(2) of the Constitution, even his fundamental right to liberty guaranteed under Article 21 has been violated."
Tahir Hussain v. State of NCT of Delhi 2025 INSC 100 22 January 2025 **Justice Pankaj Mithal*** (dismissed SLP; denied interim bail) **Justice Ahsanuddin Amanullah** ** *(granted interim bail)*	Allegations of rioting and the murder of Intelligence Bureau officer Ankit Sharma during the Delhi riots of February 2020. Accused in 11 total cases, including 9 related to the Delhi riots, and 1 under PMLA. The petitioner's house was allegedly used as the "epicenter" of the riots. Recovery of petrol bombs, acid drums, and bricks from his rooftop. **IPC §:** 34, 109, 114, 120B, 124A, 147, 148, 149, 153A, 186, 188, 201, 212, 295, 302, 307, 341, 353, 392, 395, 420, 427,	At the time of decision, the Chargesheet was submitted on 2 June 2020. Out of five named prosecution eye-witnesses, four have been examined, but the fifth witness is yet to be examined.	4 years, 10 months, 9 days of custody	**Jail** (indirectly)	**Justice Mithal's Opinion (Against Bail):** **Para 16** | "Canvassing in an election can be done in many ways such as through newspapers, social media, pamphlets, writing letters and it is not necessary that it should be in the physical form such as by holding meetings and by personal contact." **Para 24** | "In simple words, interim bail is not permissible for the purposes of contesting elections, much less for campaigning." **Para 21** | "It is high time that the citizens

The matter is referred to the Hon'ble the Chief Justice of India due to a split opinion.	435, 436, 452, 454, 468, 471 **Arms Act §:** 25, 27 **UAPA §:** 13, 16, 17, 18 **PDPP Act §:** 3, 4 **PMLA §:** Complaint Case No. ECIR 05-STF/2020				of India deserve a clean India, which means clean politics as well and for the said purpose, it is necessary that people with tainted image, especially those who are in custody and had not been granted bail and those who are undertrial, even if out of jail, be restricted in some way or the other from participating in the election." **Justice Amanullah's Opinion (Granting Bail):** **Para 25** | "The law, as it stands today, is that merely because a statute imposes limitations on grant of bail, the same would not per se oust the jurisdiction of a Constitutional Court to grant bail, as held in *Union of India v K A Najeeb*." **Para 27** | ":I have examined the allegations and the evidence against the Petitioner. No doubt,

					they are grave and reprehensible but as of this moment they are exactly that – allegations. It is settled law that magnitude and gravity of the offence alleged are not grounds, in and by themselves, to deny bail." **Para 29** | "The Petitioner is in custody since March, 2020. He has secured bail in a majority of the cases. The High Court permitted him to file his Nomination and consequently stand as a candidate. On the short point of period under custody already undergone as also the bail secured in the other cases, I am of the considered view that, subject to appropriate conditions being imposed, the Petitioner can be granted interim bail for a limited period."

Shabbar Khan v. NIA **SLP (Crl) No. 17214 of 2024** 13 February 2025 **Justice BV Nagarathna** * + Justice Satish Chandra Sharma	The case against the appellant is that he is responsible along with a mob for burning motorcycles. The riots reportedly happened over a Facebook post where derogatory comments were allegedly made about Prophet Muhammad. FIR was registered against 198 individuals, out of which 138 people have been charge-sheeted. **IPC §:**: Sections 143, 147, 148, 353, 333, 332, 436, 427 and 149 **UAPA §:**: Sections 16, 18 and 20 **Prevention of Destruction and Loss of Property Act, 1981§:** 2	At the time of the Court's Order, there were 254 witnesses to be examined.	4 Years and 1 month	**Jail**	***Order*** | We are not inclined to interfere in the matter. Having regard to the aforesaid submissions advanced by the learned senior counsel for the petitioner who has emphasised on the inordinate delay that this matter would take in disposal and bearing in mind the submission of learned A.S.G., we find that the direction issued by the High Court in Criminal Appeal No.72/2023 connected with Criminal Appeal No.183/2023 must be complied with in letter and spirit as expeditiously as possible. It is needless to observe that the learned Registrar General of the High Court in consultation with the State Government, and

					after obtaining orders from Hon'ble the Chief Justice of Karnataka High Court, coordinate for the establishment of additional N.I.A. Courts exclusively for UAPA offences which are being investigated either by the State Government or by the N.I.A. The said exercise shall be completed within a period of three months from today. .
Union of India v. Kanahiya Prasad 2025 INSC 210 13 February 2025 **Justice Bela M Trivedi*** + Justice Justice BV Varale	The case against the respondent is that he was actively involved in handling and concealing proceeds of crime generated through large-scale illegal sand mining. It is alleged that he routed over ₹17 crores through hawala channels, used the funds for acquiring and renovating a resort in Manali, financed construction of a school under his trust, and managed family entities to	At the time of decision, cognisance taken by PMLA Court.	8 months	**Jail**	**Para 17 |** "So far as facts of the present case are concerned, the High Court in a very casual and cavalier manner, without considering the rigours of Section 45 granted bail to the respondent on absolutely extraneous and irrelevant considerations. There is no finding whatsoever recorded in the impugned order that there were reasonable grounds for believing that the respondent was not

	layer and project illicit money as legitimate. **IPC §:** 38, 120B, 378, 379, 406, 409, 411, 420, 467, 468, 471 **Bihar Mining Rules §:** 39(3) **PMLA §:** 3, 4				guilty of the alleged offence under the Act and that he was not likely to commit any offence while on bail. Noncompliance of the mandatory requirement of Section 45 has, on the face of it, made the impugned order unsustainable and untenable in the eye of law." **Para 21** | "As well settled, the offence of money laundering is not an ordinary offence. The PMLA has been enacted to deal with the subject of money laundering activities having transnational impact on financial systems including sovereignty and integrity of the countries. The offence of money laundering has been regarded as an aggravated form of crime world over and the offenders involved in the activity connected with the Proceeds of Crime are treated as a separate class from

					ordinary criminals. Any casual or cursory approach by the Courts while considering the bail application of the offender involved in the offence of money laundering and granting him bail by passing cryptic orders without considering the seriousness of the crime and without considering the rigours of Section 45, cannot be vindicated."
Udhaw Singh v. ED Criminal Appeal No. No. 799 of 2025 17 February, 2025 **Justice Abhay Oka** + Justice Ujjal Bhuyan	The case against Udhaw Singh stems from his alleged role in laundering proceeds of crime generated by M/s Shine City Infra Project Pvt. Ltd., whose directors defrauded over 225 home-buyers and investors between 2018 and 2021 by collecting money without delivering promised land or returns. Singh is accused of using his firms to receive approximately ₹7.68 crores, mostly	At the time of decision , there are 225 witnesses cited, out of which only 1 has been examined.	1 year and 2 months	**Bail**	**Para 4** | "Therefore, the trial is not likely to be concluded within few years. Hence, a decision of this Court in the case of *V. Senthil Balaji v. Deputy Director, Directorate of Enforcement* will apply." **Para 7** | "For that purpose, the appellant shall be produced before the Special Court within a maximum period of one week from today. The Special Court shall enlarge the appellant on bail

	from Shine City, over a five-year period. He allegedly facilitated property purchases for the company, failed to explain the large transactions, and attempted to layer and integrate the funds to project them as untainted, thereby actively participating in the concealment and use of the proceeds of crime. **PMLA §**: 3				on appropriate terms and conditions including the condition of regularly and punctually attending the Special Court and cooperating with the Special Court for early disposal of the case. A further condition shall be imposed directing the appellant to surrender his passport, if any."
National Investigation Agency Versus Ammar Abdul Rahiman **SLP(Crl) No. 12883/2024** 14 May 2025 **Justice Surya Kant*** + Justice Nongmeikapam	The respondent, Ammar Abdul Rahiman, was arrested by the NIA in connection with FIR No. RC/05/2021/NIA/DLI for alleged links with the terrorist organization ISIS, based on digital material found on his mobile phone. He was charged under various provisions of the IPC and UAPA, later charge-sheeted for	The prosecution proposes to examine more than 160 witnesses out of whom 44 have been examined so far. The conclusion of trial will take some reasonable time.	More than 3 Years	**Bail**	**Para 4** | ".....The respondent was released on bail after he had spent almost three years in judicial custody as an undertrial. There is no instance to infer the misuse of concession of bail by the respondent. He is regularly appearing before the Trial Court and has made no attempt to obstruct the ongoing trial." **Para 5** | "That being so, we see no

Kotiswar Singh	offences relating to unlawful activities and association with a proscribed organization. After spending nearly three years in custody, the Delhi High Court granted him bail, noting insufficient evidence of active participation or dissemination of incriminating material. **IPC §:** 120B, 121, 121A **UAPA §:** 13, 17, 18, 18B, 20, 38, 39, 40, 2(o)				reason to cancel the bail granted to the respondent. However, the learned Additional Solicitor General appears to be justified in urging that the respondent should not be allowed to go abroad during pendency of the trial. In this regard it is directed that the respondent shall not travel abroad unless prior permission is granted by the High Court. To this extent, the order passed by the Trial Court stands modified. Similarly, it is clarified that the observations made by the High Court touching upon the merits of the allegations attributed to the respondent in the FIR or the charge-sheet, are limited only for the purpose of grant of bail and the same shall have no bearing on the merits of the trial."

Union of India v. Saleem Khan Criminal Appeal No. 3644 of 2025 20 August 2025 **Justice Vikram Nath*** + Justice KV Viswanathan Connected Matter: **Mohd. Zaid v. Union of India** | Criminal Appeal No. 1353 of 2025	The case against Saleem Khan (A-11) is that he and Mohd. Zaid (A-20), along with several others, were involved in a conspiracy to carry out unlawful and terrorist activities. Saleem Khan was alleged to be directly involved in facilitating such activities, while Mohd. Zaid was alleged to be associated with members of the group and to have provided support in furtherance of the conspiracy. Both were arrested in early 2020 and remained in custody, with the investigation later taken over by the NIA. **IPC §:** 120-B **Arms Act §:** 25(1B)(a) **UAPA §:** 18, 18-A, 18-B, 19, 20, 38, 39	At the time of decision, the charges have not been framed.	5 Years 6 Months	**Bail** (granted to Sleem was affirmed) **Jail** (Mohd. Zaid)	**Author's Note**: Saleem got bail because his links were only with Al-Hind, a non-banned group, and he'd been jailed 5.5 years without trial; Zaid was denied bail due to alleged active links with banned terrorist organisations and deeper involvement in terror activities. **Para 8 |** "At the outset, we may put our caution that since the present appeals relate to grant/refusal of prayer of bail, we are not inclined to delve deep into the facts and the reasonings. The impugned order passed by the Karnataka High Court has dealt with all the aspects in great detail. The reasons given for grant of bail to Saleem Khan, accused no.11 and the reasons given for refusal to grant bail

					to accused no.20, Mohd. Zaid in our considered opinion is fully justified and reasonable." **Para 9 |** "While dealing with the prayer for bail of accused no.11, Saleem Khan, the High Court noticed that the allegations found in the charge-sheet related to his connections with an organisation by the name of AL-Hind, which admittedly is not a banned organisation under the schedule to UAPA. Therefore, to say that he was attending meetings of the said organisation, AL-Hind and others would not amount to any *prima facie* offence. Apart from the above, we also noticed that the impugned order by the High Court was passed on 21.04.2022 almost 3-1/2 years ago and as such, it may not be just and proper to interfere with the same at this

					stage. Further, it is admitted position at the bar that the charges have not been framed so far and trial has not commenced even though the accused have been in custody for 5-1/2 years. **Para 11** | "11. Insofar as the accused no.20 is concerned, the High Court has found his involvement with banned terrorist organisations, his active role in operating dark web and assisting the members of the banned terrorist organisations. The reasons given by the High Court are based upon the material collected during investigation and as reflected in the charge-sheet. The High Court further noticed the involvement of accused no.20 in another case under UAPA. Although, we may record here that in the said case

					arising from State of Tamil Nadu, accused no.20 has been granted bail by the Madras High Court." **Para 13** | "However, the fact remains that the trial has not commenced despite lapse of 5-1/2 years. Accused cannot be allowed to languish in jail without being given a fair and speedy trial. It is therefore in the fitness of things that the Trial Court be directed to expedite the trial and conclude the same within a period of two years considering that there are more than 100 witnesses to be examined by the prosecution. The prosecution is also directed to ensure full cooperation in leading the evidence and getting the trial concluded within the time specified above. It also goes without saying that the accused will also extend full

					co-operation in the conduct of the trial in particular accused no.11, who has been released on bail."
Kareem @Sadam v. State by NIA SLP (Crl) No. 11626 of 2025 with SLP (Crl) No. 14302/2025 **7 October 2025** **Justice MM Sundresh*** + Justice Satish Chandra Sharma	The case against the appellants is that they are responsible along with a mob for burning motorcycles. The riots reportedly happened over a Facebook post where derogatory comments were allegedly made about Prophet Muhammad. An FIR was registered against 198, out of which 138 people have been charge-sheeted. **IPC §:**: Sections 143, 147, 148, 353, 333, 332, 436, 427 and 149 **UAPA §:**: Sections 16, 18 and 20 **Prevention of Destruction and Loss of Property Act, 1981 §:** 2	At the time of the Court's Order, there were 254 witnesses to be examined. The appellants were two amongst the 138 accused persons.	5 Years	**Bail**	**Para 4.** | "We have perused the charges framed. The appellants have been under incarceration for more than five years. There are 254 witnesses to be examined. The appellants are two amongst the 138 accused persons." **Para 6.** | "Accordingly, the impugned order(s) stand set aside and the appellants are granted bail, subject to the terms and conditions that may be imposed by the Trial Court."
Umar Khalid v.	The case against Umar Khalid, Sharjeel Imam,	Cognizance has been taken by	5 Years and 5 months	*To be decided*	

State of Nct Of Delhi SLP (Crl) No. 14165/2025 **Gulfisha Fatima v. State (Govt. Of Nct of Delhi)** SLP (Crl) No. 13988/2025 **Sharjeel Imam v. The State Nct of Delhi** SLP (Crl) No. 14030/2025 **Meeran Haider v. The State Nct Of Delhi** SLP (Crl) No./14132/ 2025 **Shifa Ur Rehman v. State Of**	Meeran Haider, Gulfisha Fatima, and Shifa-Ur-Rehman arises from allegations of orchestrating a larger conspiracy behind the February 2020 Delhi riots during protests against the Citizenship Amendment Act. The prosecution claims the accused and others planned and coordinated violent protests through WhatsApp groups, pamphlets, and meetings, inciting communal violence that led to riots on 22–24 February 2020. These riots resulted in 54 deaths, including police and intelligence officials, injuries to several others, and destruction of more than 1,500 properties. The alleged conspiracy was carried out in phases, involving mobilization, inflammatory	Trial Court in September 2020; supplementary chargesheets filed in November 2020, February 2021, March 2022, and June 2023.			

National Capital Territory SLP (Crl) No. 14859/2025 Justice Aravind Kumar + Justice NV Anjaria	speeches, stockpiling of weapons and petrol bombs, and disruptive chakka-jams, ultimately escalating into widespread riots. **IPC §:** 147, 148, 149, 120B, 109, 114, 124A, 153A, 186, 201, 212, 295, 302, 307, 341, 353, 395, 419, 420, 427, 435, 436, 452, 454, 468, 471, 34 **UAPA §:** 13, 16, 17, 18 **Arms Act §:** 25, 26, 27 **PDPP Act §:** 3, 4				