

STATUS OF SEDITION LAW IN INDIA: A CRITICAL STUDY

By: Ritwiz Harshvardhan

LL.M., 2nd Semester, Chanakya National Law University, Patna

ABSTRACT

India is a democratic country and every citizen here has a right associated with him to put forward his ideas, viewpoints, and grievances. Freedom of Speech and Expression is one of the most prominent Fundamental Rights given by the Indian Constitution. But this right is indeed is being obstructed by invoking Sedition law by the government. The recent instance of invoking the sedition laws in various instances clearly shows that the government is applying this to curb the voices of dissent. Sedition law has always remained a tool in the hands of the governments to put silence on its critics. This law under Section 124 -A of the Indian Penal Code which was introduced during the Colonial time to suppress the freedom movements and to punish the freedom fighters is still applied arbitrarily which is a matter of concern. In our country, the rule of law exists so when a sedition law is applied in an arbitrary manner it does not connect with the essence of constitutionalism. The rapid misuse of the sedition law has always raised a moot issue that this law has become obsolete in the present scenario and it should be scrapped.

This paper will deal with the issues of sedition law in India, its origin, its relevance in the present society, comparative study with other countries, and will attempt to assemble all the issues associated with repealing or amendment of this law.

Keywords: Sedition, Freedom of Speech and Expression, Indian Penal Code, Constitutionalism

Table of Contents

ABSTRACT.....	225
INTRODUCTION	227
HISTORICAL BACKGROUND	229

LEGISLATIONS RELATED TO SEDITION IN INDIA.....	231
Constitutionality of Sedition Law in India.....	232
SEDITION LAW: COMPARITIVE PERSPECTIVE.....	234
United Kingdom.....	234
Australia	234
Malaysia	235
CONCLUSION.....	236
BIBLIOGRAPHY.....	237

INTRODUCTION

The recent cases involving invoking sedition law have again sparked the debate of scrapping the sedition law in India. The data released in the year 2019 by National Crime Record's Bureau (NCRB) clearly pointed out that there is a massive increase in the number of sedition cases i.e., 165 percent increase from 35 in the year 2016.¹In the recent case of climate activist Disha Ravi who was accused and was arrested on charges of sedition, the Additional Sessions Judge while allowing Bail to her in toolkit case has made an important observation that: -

“Citizens play a very prominent role in a democracy as they are the actual conscience keepers of the government. If they do not agree with policies of the state that does not mean they can be put into jail. Regarding offence of sedition, it cannot be raised to minister to the wounded vanity of the governments.”²

Sedition law finds its presence in Section 124- A of the Indian Penal Code. The law of sedition was introduced by the British Government and it was a very effective tool then used by the British in a barbaric way to curb the freedom movements in India. Many freedom fighters were put into jail on the charges of sedition. After the independence and also after the constitution coming into force this law of sedition retained and it was not removed. The sad part is that from time to time several governments that came into power and they used this sedition law to harass their opponents and critics and always tried to restrain the voices of dissent. India being a democracy, each person has his own opinion and viewpoints. One may agree with the ideas and policies of the government and one may not. Every citizen has been guaranteed Right to Freedom of Speech and Expression but it is subject to reasonable restrictions. While in these reasonable restrictions to such rights law of sedition is allowed, but the question always arises regarding the scope of such law.

¹ Leah Verghese, *NCRB 2019 data shows 165% jump in Sedition cases, 33 % jump in UAPA cases under Modi govt*, ThePrint (April 29, 2021, 1:10 AM) <https://theprint.in/opinion/ncrb-2019-data-shows-165-jump-in-sedition-cases-33-jump-in-uapa-cases-under-modi-govt/521861/>

² *Disha Ravi granted Bail in toolkit case; Court says Toolkit reveals no call for any kind of violence*, The Leaflet (April 29, 2021, 2:00 AM) <https://www.theleaflet.in/disha-ravi-granted-bail-in-toolkit-case/>

Sedition law has always created an obstacle in exercising the freedom of speech and expression. It has become only a mechanism to restrain the freedom of speech and expression and by this it clearly reflects the legacy of dark past of the colonial era. There has been a rigid and reluctant approach by the Indian State regarding amending or scrapping the sedition law in spite of the fact that in the present scenario the law of sedition is an outdated concept and it nowhere finds its relevance.

HISTORICAL BACKGROUND

In the very famous case of *R. V Alaxender Martin Suvillian* the actual meaning of the word Sedition was laid out. The observation made was that Sedition is a crime against the society and the nature of sedition is that it is a very comprehensive term and it includes in its ambit all those practices whether by using of words, deed or writing and which contributes in distressing the tranquility of the state.³This case was although a case of United Kingdom but it was a landmark case and it laid foundation stone on understanding the concept of sedition.

It is known that offence of sedition is enumerated in section 124 A of the Indian Penal Code. Talking about its origin, in the year 1837 Lord Maculay articulated anti sedition law but it was added in the year 1870 not in the year 1860 when the enactment of Indian Penal Code took place. In the year 1870 the was embedded in the Indian Penal code and that too in the Chapter 6 that deals with offences against the state. The main reason of this was due to increase in the Wahabi movement which was a radical movement led by Syed Ahmed Barelvi⁴. Later on, during the British era it became a tool to suppress the freedom movements and control the mutiny activities against the British and also to harass the Indians who joined the freedom movement.

The famous case of *Queen Empress v. Jogendra Chandra Bose* which was also known as Bango basi case was the first registered case related to the offence of sedition and in this case sedition case was charged against the Editor of the newspaper called Bangobasi.⁵ But ultimately he was released on bail as no common decision took was reached by jury.⁶ Another famous case i.e. *Queen Empress v. Bal Gangadhar Tilak* led to amendment in the year 1898.⁷ Here in this case a speech was given by Tilak which talked about assassination of Afzal Khan by Shivaji and this

³Kajeev Kumar, *Sedition Law & Freedom of Expression*, LegalservicesIndia (April 29, 2021, 8:00 PM)
<http://www.legalservicesindia.com/article/898/Sedition-Law-&-Freedom-of-Expression.html>

⁴Diva Rai, *Sedition in India: mind blowing points you must know*, blog.ipleaders (April 29, 2021, 8:30 PM)
<https://blog.ipleaders.in/sedition-in-india/>

⁵Jhalak Shah & Shantanu Pachauri, *An analysis of Sedition Law in India*, ResearchGate (April 29, 10:50 PM)
https://www.researchgate.net/publication/342503880_An_analysis_of_sedition_law_in_India

⁶ Ibid

⁷MD Shah Minhajuddin, *Critical Study on Sedition laws in India*, LegalservicesIndia (April 29, 11:00 PM)
<http://www.legalserviceindia.com/legal/article-4929-critical-study-on-sedition-laws-in-india.html#:~:text=Section%20124A%20of%20Indian%20Penal,India%2C%20shall%20be%20punished%20with>

speech was labeled as seditious by British as it incited the murder of British officers in Pune.⁸ In this case the definition of dissatisfaction was defined by the court that the basic meaning of dissatisfaction is absence of the element of satisfaction. So, as per the court the meaning comprises of “hatred, enmity, dislike, hostility and ill will towards the government”. The Court also laid down that no person shall indulge in exciting dissatisfaction and also court convicted Tilak for the offence of sedition and awarded 18 months rigorous imprisonment.⁹ In another famous case that involved the sedition law and gathered huge controversy was the case of Annie Besant. In that case section 4(1) of the Press Council act was in issue. This section had resemblance with the Section 124-A of the Indian Penal Code. The court in this case complied with the former interpretations and so the materials of Annie Besant that were labeled as seditious were ultimately seized.¹⁰

Father of the Nation Mahatma Gandhi also faced sedition charges and he was also put on trial. Sedition Charges were labeled against him for writing articles in his journal Young India which had the sensitive content and he was charged with “bringing or attempting to excite disaffection towards government established by law in British India”.¹¹

After India become independent in 1947, the sedition law started to face criticism as it was a colonial law and was made with the intention to suppress the Indians. The point raised was that since it was a colonial law it should not be continued. In the year 1951, then Prime Minister Pandit Jawahar Lal Nehru during the introduction of 1st Constitutional amendment said that “*Now so far, I am worried that the concerned section i.e., section 124-A of the Indian Penal Code is highly obnoxious and controversial and it should have no place both for the purpose of practical as well as historical reasons, if you like, in body of laws that we might pass. The sooner we are liberated of it the better. There are the other ways in which we can deal that matter.*”¹²

So, this statement was given by Pandit Nehru in the year 1951 but still in the year 2021 we are encumbered with this law.

⁸ Ibid

⁹ Rai, Supra Note 4.

¹⁰ Shah & Pachauri, Supra Note 5.

¹¹ Ashwaq Masoodi, *Republic of Dissent: Gandhi's Sedition trial*, Livemint (April 30,2021, 9:30 PM) <https://www.livemint.com/politics/news/republic-of-dissent-gandhi-s-sedition-trial-1548352744498.html>

¹² AmritNanda Chakroborty, *Sedition has no place in a democratic society The Leaflet* (April 30, 2021, 10:30 PM) <https://www.theleaflet.in/sedition-law-has-no-place-in-a-democratic-society/>

LEGISLATIONS RELATED TO SEDITION IN INDIA

Sedition is a comprehensive term and it includes within its ambit practices whether by word, deed or writing which actually cause disturbance to the tranquility of the state. The components of sedition usually are to persuade discontent and to create a situation of revolt. Sedition has termed as infidelity in action and the law takes into account all those activities which have clear objective to incite dissatisfaction to cause public disturbance or to lead to civil war, to create hatred or contempt of the government.¹³

Section 124-A of the Indian Penal code is the primary legislation dealing with sedition. It reads

“Whoever by words, either spoken or written, or by signs or visible representation, or otherwise, brings or attempts to bring into hatred or contempt, or excites or attempts to excite disaffection towards, the government established by law in India, shall be punished with imprisonment for life, to which fine may be added, or with imprisonment which may extend to three years, to which fine may be added, or with fine.

Explanation 1- The expression disaffection includes disloyalty and all feelings of enmity.

Explanation 2- Comments expressing disapprobation of the measures of the Government with a view to obtain to obtain their alteration by lawful means, without exciting or attempting to excite hatred, contempt or disaffection, do not constitute an offence under this section.

Explanation 3- Comments expressing disapprobation of the administrative or other action of the Government without exciting or attempting to excite hatred, contempt or disaffection, do not constitute an offence under this section.”¹⁴

The reading of this section clearly points out that the application of this section will take place only when the accused brings or attempts to bring in hatred or contempt or there is an attempt to stimulate disaffection towards the government.¹⁵

¹³ Ratanlal & DhirajLal, The Indian Penal Code 262 (34th ed. LexisNexis 2014)

¹⁴ The Indian Penal Code, No. 45 of 1860, § 124-A, Acts of Parliament , 1860 (India)

¹⁵ Ratanlal & Dhirajlal, Supra Note 13 at 263.

Going by the explanations, explanation 1 of this section uses the word “disaffection” and this includes disloyalty and feelings of enmity in its ambit. So, it can be said that explanation 1 deals with the scope of disaffection and the other two explanations point out the ingredients that are not within the ambit of sedition. If a person is a mere member in a banned organization then only on this ground he will not be incriminated unless he opts for violence or incites people to indulge in the act of violence or disturb the peace.¹⁶ In case of *Balbir Singh v. State of U.P.*¹⁷, here conviction was due to listening of cassette which was of a seditious nature and court held that there were no other evidences present that could show that accused were conspiring or committing disruptive activities under Terrorist & Disruptive Activities Act (TADA) 1987 and so the conviction was set aside by the Apex Court. This word sedition does not find its place in the body of this section and it only finds its existence as a marginal note.¹⁸

Constitutionality of Sedition Law in India

*Ram Nandan v. State of U. P.*¹⁹ was one of the most prominent case and the first case that addressed the constitutionality of Section 124-A. It was held by the Allahabad High Court that this section 124-A of the Indian Penal Code clearly violates Article 19(1) (a) of the constitution.²⁰ The landmark case related to Section 124-A was the case of *Kedarnath v. State of Bihar*²¹. This case upheld the constitutional validity of Section 124-A. The provisions mentioned are not in violation of Article 19(1)(a) of the Indian constitution.²² It was also made clear that the explanations that are attached with the section specifically clears that criticizing public measures or to have a comment on the actions of the government within the limits of fundamental right to speech and expression is not within the ambit of sedition.²³ The observation made by Sinha CJ in this case- “comments that points towards disapprobation of actions of the Government that does not result in violence or generating the inclination to create public disorder would not be

¹⁶ *Indra Das v. State of Assam*, (2011) 3 SCC 380

¹⁷ AIR 2000 SC 464

¹⁸ Prernavpreet Kaur, *Sedition under section 124-A of the Indian Penal Code: An Analysis*, 2J. International Journal of Law Managment and Humanities (2019) (May 1 2021. 10:30 PM) <https://www.ijlmh.com/wp-content/uploads/2019/06/Sedition-Under-Section-124-A-of-the-Indian-Penal-Code-An-Analysis.pdf>

¹⁹ AIR 1959 All 101

²⁰ Guest Post, *Constitutionality of Sedition Law in India*, blog.iplayers (May 2, 2021, 12:00 PM) <https://blog.iplayers.in/constitutionality-sedition-law-india/>

²¹ AIR 1962 SC 955

²² *Ratan Lal & Dhirajlal*, *Supra* Note 13 at 263

²³ *Ibid.*

penal”.²⁴ This judgment also made clear that there should no arbitrary application of the sedition law and if it is done then there would be a clear violation of Article 19(1) (a) of the Indian Constitution. So, by this judgment the meaning is clear that a citizen can criticize the actions of the government but keeping in mind that his words or comments does no cause incitement to violence.

Now apart from Section 124-A IPC another important legislation related to sedition is Section 95 of the Code of Criminal Procedure. It talks about forfeiture by State Government of any newspaper, book or document (including painting, photograph) the publication of which is punishable under section 124-A/153A/153B, Section 295A of the Indian Penal code.²⁵ So, it can be inferred from this section that firstly, the material that exists is to be of such nature that it attracts Section 124-A of the Indian Penal Code and also the reasons to be given by the government for the purpose of forfeiting the material so punishable.²⁶ Section 196 of the Code of Criminal Procedure says that no courts shall take cognizance of the offences which also includes Section 124-A of the Indian Penal Code except with the prior sanction of the Central Government or State government.²⁷ The other offences those are included within the ambit of this section are Section 153 A, Section 295-A and Section 505 of the Indian Penal Code. Since the offence of sedition is of a serious nature and it hampers the public tranquility, so this section prevents the person who are unauthorized from instituting prosecutions and so the authority is only left with the government.

²⁴ Ratan Lal & Dhirajlal, Supra Note 13 at 264

²⁵ The Code of Criminal Procedure, No. 2 of 1974, § 95, Act of Parliament (India)

²⁶ CK Thakkar Takwani & M.C Thakkar, Criminal Procedure 73-74,(4th Ed. Lexis Nexis, 2015)

²⁷ R.V Kelkar, Criminal Procedure 243, (6th Edition, Eastern Book Company, 2015)

SEDITION LAW: COMPARITIVE PERSPECTIVE

The recent cases of application of sedition law in this democratic country has again has once again pointed out a prominent question that whether this law needs to be scrapped or not. So, a comparative viewpoint also has to be seen.

United Kingdom

The origin of sedition can be seen from the common law principles of seditious label that grew from the oldest law of the British i.e., Statute of Westminster and here kings were considered as divine.²⁸ The famous case that brought sedition law into picture was “Star Chamber case” of 1606. In England the sedition law was scrapped in the year 2009 through Coroners and Justice Act 2009.²⁹ The then Parliamentary under Secretary of State at the Ministry of Justice Claire Ward made an important observation during the enactment of the act “Sedition and defamatory libel are impenetrable offences- from a bygone era when freedom of expression was not relevant as of today”.³⁰

Australia

Among the Common wealth countries, Australia was one of them where enforcement of law of sedition took place. The most prominent legislation was the Crime act 1920. In the year 2005 the Anti- terrorism act came into picture and most of the provisions that were in existence in the sedition law were repealed.³¹ Later on, review was done by Australian Law Reform Commission with respect to the fact that whether this word sedition is appropriate enough to elucidate the offences mentioned in the 2005 amendment.³²

²⁸How British Abolished their Sedition laws- KPUM, malaymail (May 2, 2021, 9:00 PM)
<https://www.malaymail.com/news/what-you-think/2015/04/16/how-the-british-abolished-their-sedition-laws-kpum/879233>

²⁹ Prasun Sonwalkar, *Sedition Law in UK abolished in 2009, continues in India*, Hindustantimes (May 2, 2021, 9:10 PM) <https://www.hindustantimes.com/world/sedition-law-in-uk-abolished-in-2009-continues-in-india/story-Pkrvylv6J0T3ddY8uqvKsO.html>

³⁰ Ibid.

³¹Sarah Soriyal, *Sedition and Question of Freedom of speech* (May 3, 2021, 10:45 PM)
<http://www5.austlii.edu.au/au/journals/CICrimJust/2007/4.pdf>

³²Law Commission of India Consultation Paper on “Sedition” (May 4, 2021, 12:22 AM)
<https://static.pib.gov.in/WriteReadData/userfiles/Consultation%20Paper%20on%20Sedition.pdf>

Malaysia

It is a South East Asian country and in this part of the world most of the countries are not purely democratic so it is need to have a look on the sedition law. Malaysia was also under colonial control and sedition came into picture in 1948 by the Sedition Act 1948. As per this act, “seditious” means any act, speech or word, publication that is having traits of “seditious tendency”.³³ In section 3 the definition of seditious tendency is also laid down and it is very much similar to the English common law.³⁴ Seditious tendency means –

- a. “To bring hatred or contempt or to excite disaffection against the ruler or the government.
- b. To seek for alteration other than the means that is lawful of any matter by law established.
- c. To bring hatred or contempt to the administration of justice in the country.
- d. To raise disaffection amongst the subjects.”³⁵

So, the initial purpose of enactment of this act was to tackle the communist insurgency but later on few amendments were made in the constitution through an ordinance in 1971 that criminalized questioning on citizenship, on special position of Malays and rights of other races.³⁶ In the year 2012, the Government of Malaysia promised to repeal the law of sedition but later on Malaysian Government took a U turn and so the promise was not fulfilled. ³⁷ Later on, in the year 2015 the Apex Court of Malaysia while deciding on the constitutionality of Sedition act 1948 upheld its validity. It was clearly held by the court that this act was in conformity with the Article 10 of the Constitution of Malaysia that guarantees the freedom of speech and expression.³⁸

³³ Wan Haron Wan Hassan, *The never ending polemics over the sedition act*, Freemalaysiatoday (May 4, 2021, 1:00 PM) <https://www.freemalaysiatoday.com/category/opinion/2019/01/23/the-never-ending-polemics-over-the-sedition-act/>

³⁴ Ibid.

³⁵ Roos Niza Md. Sharif, *Sedition Act as a pillar in maintaining unification for multiracial nation*, 4J International Journal of Business, Economic and Law (2015) (May 4, 2021, 1:34 PM) http://ijbel.com/wp-content/uploads/2015/05/Law1_PAID_IJBEL_journal-IJBEL-vol.-6-Apr-2015_D1.pdf

³⁶ Ibid.

³⁷ Ankit Panda, *Malaysia backtracks on Sedition Law*, The Diplomat (May 4, 2021, 2:05 PM) <https://thediplomat.com/2014/11/malaysia-backtracks-on-sedition-law/>

³⁸ Malaysia: *Sedition Act upheld in further blow to free expression*, Article 19 (May 4, 2021, 2:11 PM) <https://www.article19.org/resources/malaysia-sedition-act-upheld-in-further-blow-to-free-expression/>

CONCLUSION

Sedition law has always remained controversial. The law which was passed during the Colonial era to has become a burden in present scenario. It is causing hindrance in freedom of speech and expression. It has become a draconian law. The constitutionality of sedition law was upheld in the famous Kedar Nath's case. But we are seeing today that mere chanting of slogans that does not result actually in violence is put under the ambit of sedition law. Examples of that we can see in many instances like case of cartoonist Aseem Trivedi etc. The most essential component for applying the sedition law is that whether it results in provocation of violence. Law of sedition has become a tool in the hands of government to put restraint on voices of dissent. We have observed that every government that comes into power uses this law to silence its critics and ultimately by way of this fulfilling their political motives. Many a times the issue of scrapping the sedition law has been raised but nothing has happened till now. In the 2019 General Elections Congress Party also promised in its manifesto that the sedition law will be scrapped if their party comes into power at center. ³⁹Justice Balbir Singh Chauhan, Chairman of 21st Law commission also said that "Law of Sedition requires reconsideration."⁴⁰We can see the example of United Kingdom where sedition law was removed. Here also in India this law has become obsolete and it is no more relevant in present scenario. If we talk about the data, then as per National Crime Records Bureau although growth in filing of sedition cases can be seen but the conviction rate is very low. There is a drop in the conviction rate to 3.3% in the year 2019.⁴¹

So, we see can see that arbitrary application of this law by the governments is truly a matter of concern. There is need to have reform in the sedition law of India.

³⁹ *Congress manifesto promises to do away British era Sedition law*, Indiatoday (May 4, 2021, 3:30 PM) <https://www.indiatoday.in/elections/lok-sabha-2019/story/congress-manifesto-sedition-law-section-124a-1492013-2019-04-02>

⁴⁰ *Sedition Law needs relook: Balbir Singh Chauhan, Law Commissioner Chief*, The Economic Times (May 4, 2021, 4:15 PM) <https://economictimes.indiatimes.com/news/politics-and-nation/sedition-law-needs-relook-balbir-singh-chauhan-law-commission-chief/articleshow/51511513.cms?from=mdr>

⁴¹ Rahul Tripathi, *Arrests under Sedition Charges rise but conviction falls to 3%*, The Economic Times (May 4, 2021, 5:10 PM) [https://economictimes.indiatimes.com/news/politics-and-nation/arrests-under-sedition-charges-rise-but-conviction-falls-to-3/articleshow/81028501.cms?from=mdr#:~:text=Between%202016%20and%202019%2C%20the,Crime%20Records%20Bureau%20\(NCRB\).](https://economictimes.indiatimes.com/news/politics-and-nation/arrests-under-sedition-charges-rise-but-conviction-falls-to-3/articleshow/81028501.cms?from=mdr#:~:text=Between%202016%20and%202019%2C%20the,Crime%20Records%20Bureau%20(NCRB).)

BIBLIOGRAPHY

STATUTES

1. The Indian Penal Code, 1860.
2. The Code of Criminal Procedure, 1973.

BOOKS

1. The Indian Penal Code by Ratan Lal & Dhiraj Lal, 34th Edition, Lexis Nexis (2014)
2. Criminal Procedure by R.V Kelkar, 6th Edition, Eastern Book Company (2015)

CASE LAWS

1. Balbir Singh v. State of U.P
2. Kedar Nath v. State of Bihar.
3. Ram Nandan v. State of U.P

INTERNET SOURCES

1. Leah Verghese, *NCRB 2019 data shows 165% jump in Sedition cases, 33 % jump in UAPA cases under Modi govt*, The Print <https://theprint.in/opinion/ncrb-2019-data-shows-165-jump-in-sedition-cases-33-jump-in-uapa-cases-under-modi-govt/521861/>
2. Kajeev Kumar, *Sedition Law & Freedom of Expression*, LegalservicesIndia <http://www.legalservicesindia.com/article/898/Sedition-Law-&-Freedom-of-Expression.html>
3. Jhalak Shah & Shantanu Pachauri, *An analysis of Sedition Law in India*, ResearchGate https://www.researchgate.net/publication/342503880_An_analysis_of_sedition_law_in_India
4. Diva Rai, *Sedition in India: mind blowing points you must know*, blog. Pleadere <https://blog.ipleaders.in/sedition-in-india/>

5. Ashwaq Masoodi, *Republic of Dissent: Gandhi's Sedition trial*, Livemint <https://www.livemint.com/politics/news/republic-of-dissent-gandhi-s-sedition-trial-1548352744498.html>
6. AmritNanda Chakroborty, *Sedition has no place in a democratic society The Leaflet* <https://www.theleaflet.in/sedition-law-has-no-place-in-a-democratic-society/>
7. Prernavpreet Kaur, *Sedition under section 124-A of the Indian Penal Code: An Analysis*, 2J. International Journal of Law Manangement and Humanities (2019) <https://www.ijlmh.com/wp-content/uploads/2019/06/Sedition-Under-Section-124-A-of-the-Indian-Penal-Code-An-Analysis.pdf>
8. *Law Commission of India Consultation Paper on "Sedition"* <https://static.pib.gov.in/WriteReadData/userfiles/Consultation%20Paper%20on%20Sedition.pdf>
9. *Sedition Law needs relook: Balbir Singh Chauhan, Law Commissioner Chief*, The Economic Times <https://economictimes.indiatimes.com/news/politics-and-nation/sedition-law-needs-relook-balbir-singh-chauhan-law-commission-chief/articleshow/51511513.cms?from=mdr>
10. Roos Niza Md. Sharif, *Sedition Act as a pillar in maintaining unification for multiracial nation*, 4J International Journal of Business, Economic and Law (2015) http://ijbel.com/wp-content/uploads/2015/05/Law1_PAID_IJBEL_journal-IJBEL-vol.-6-Apr-2015_D1.pdf