



Institutional fragility and legal vacuums in Indian land governance: A study of corruption, allocation scams, and systemic accountability gaps

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Abstract

The land in India is more than just a physical dimension- it is one of the most very important determinants of economic security, social hierarchy and political power. Land represents the intersection of governance, justice and development as a source of livelihood and a legal right. However, the system of land governance continues to be deeply institutionalised and archaic with bureaucratic cloudiness in India. Under the rule of numerous laws, powers, and rules, the existing system has facilitated institutionalized corruption in land allocation, land registration and land transfer. Benami transactions, fraudulent documentation, proxy ownership as well as forged title deeds have become a norm that continues to perpetuate inequity and dispossession. Besides undermining the sanctity of ownership rights, these malpractices undermine the constitutional vision of distributive justice found in Articles 14, 21 and 300A. The challenges of proving land frauds due to the rigidity of the procedures, the inefficiency of the verification system, and the lack of the authenticity of records also hinder the provision of justice. Although the Digital Land Records Modernisation Programme (DLRMP) was seen as a radical intervention to digitize and unite land databases, its effect has been limited due to the jurisdictional overlap, outdated administrative strategies and technological synergy. Through this study, the suggested establishment of an Integrated Land Governance Code with a single legal framework underpinning property registration, land use regulation, and ownership verification is recommended. Institutional coherence would be enforced by the establishment of a National Land Authority with the mandate to harmonize registration, record management and dispute resolution. At the same time, with a blockchain-anchored record architecture, along with Aadhaar authentication, satellite mapping and AI-informed analytics, a verifiable and interoperable land database that is impossible to tamper with could be established. It also suggests Special Land Governance Tribunals to be adjudicated faster and more severe criminalization of land frauds and mandatory cancellation of forged deeds. Finally, it renews the moral principle of the State as a trustee of territory and strengthens accountability and distributive justice in all operations.

Keywords: Corruption, land governance, land scams, property

Introduction

The Indian land does not have the connotation of a physical or economic idea but rather a social identity, economic security and political power. To the millions of Indians, especially the rural Indians, land is the main source of their livelihood, social mobility and cultural belonging. The transition of India into an urban-industrial society, land is now a very limited and rather disputable resource, which breeds enormous amounts of corruption, speculation, and illegal acquisition opportunities^[1].

The Indian land law and institutional regulation are very complicated. Under the seventh schedule, as on the subject of revenue and tenancy, Entry 18, List II, is the State subject of land, according to which each State has its own revenue and tenancy laws. However, the Union government intervenes in the acquisition, registration, and environmental regulation process, which creates a maze of jurisdictions. Legislation including the Transfer of Property Act, 1882, the Registration Act, 1908, and the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013.

Concurring powers are vested in multiple authorities over land records, over ownership validation and over usage approvals namely Revenue Departments, Urban Development Authorities, Municipal Bodies and Housing Boards. This disjointed system creates uncertainty, bureaucratic license and breeding grounds of fraud. In the last 20 years, land governance corruption has become an

endemic level. The Adarsh Housing Society Case (Maharashtra), the NOIDA Land Allotment Scam (Uttar Pradesh), and the Haryana DLF-Robert Vadra Case are examples of high-profile scams where the politicians, the bureaucrats, and the private developers colluded to operate. Elite capture is not the only form of such corruption but one can go even down to the daily business of registration, mutation and conversion of land use.

This invisibility of land records, a lack of real-time verification, and discretion in the process of procedure permit illegal enrichment against both the trust of the people, as well as equitable development. On a theoretical level, the paper places corruption in land administration in the broader context of rule of law, accountability, and trust in the government. And discusses the constitutional morality of the State as the trustee of the public resources under Articles 14, 21 and 300A. All these provisions would create a duty of fairness, non-arbitrariness and legality in all administrative transactions involving land. However, even with these constitutional guarantees, the administration has failed in its duties and the bureaucracies have become complacent so that citizens have lost trust in the honesty of land governance.

The study takes a doctrinal methodology that is based on statutory interpretation, judicial precedents, and policy analysis to determine the extent to which corruption has corroded the rule of law in land governance.

Research and Discussions

Significance of Land in India as a Socio-Economic and Legal Property

In Indian context, land is more than what it is physically; it has an economic, social, cultural and legal meaning. It is not just an asset but a means of earning living, social identity and power. Most of the Indians still rely on land as a source of agriculture, shelter and small scale industries which is their main source of production and survival. Economically, wealth and social mobility are dependent on land ownership. Ownership of land determines the ownership of credit, investment and economic security [2].

The population to the land ratio makes the land accounting a matter linked to the human development concerns [3]. Land is a limited and disputed resource, and the increasing urbanization, industrialization, and infrastructural development provide a high level of competition regarding the control. This is the lack that increases its value in the market and, therefore, prospects of corruption, speculation, and illegal acquisition. Land as a social object of identity and status is intertwined with caste relations and community orders. Even after land reform laws in post-independent countries, the truth is still that a minute percentage of the population still owns a disproportionate amount of land resources.

In the legal sense, land is the combination of the rights to own, to possess, to transfer, and to use this property, and all of this is regulated by complicated laws and administrative practices. The right to property, which had been a fundamental right in the Constitution under Article 19(1)(f), is now a constitutional legal right in Article 300A. This legal protection is however, usually made a mirage by the inefficiency and corruption within the administrative process and a lack of transparency in the land governance structures. This means that the legal structure of land is at once a safeguard and a battle field on the one hand, between the collective will of society to grow and the personal right to own property.

Multifaceted Land Governance Structure Multiple Laws, Multiple Authorities, And Multiple Jurisdictions

The Indian system of land governance follows a complex and fragmented system, which is based upon its colonial history, federalism and a variety of legal tools. The land is a subject of the State under the seventh schedule (List II, entry 18) of the Indian constitution that is, each State has its own land laws which it provides and manages. The Union government is also involved in some areas of land governance particularly with regard to registration, acquisition and environmental control which form overlapping jurisdictions. The land administration acts which are critical to defining land administration are: Varying States Land Revenue Codes, which control classification, assessment and records of land. The Registration Act, 1908, that regulates documentation and registration of property transactions. The substantive law on the conveyance and ownership is found in the

- Transfer of Property Act, 1882.
- Land Acquisition, Rehabilitation and Resettlement Act, 2013.
- The Benami Transactions (Prohibition) Act, 1988 (2016 amendment),

These legislations overlap a wide range of administrative agencies, including the Revenue Departments, Urban Development Authorities, Housing Boards, and Municipal Bodies, with different, but frequently overlapping powers. Such decentralization creates confusion in accountability allowing bureaucratic discretion and manipulation. There was also the digitization program such as the Digital India Land Records Modernization Programme (DILRMP) focused on integrating land records, cadastral maps and registration [4]. However, the roll out among the States has been inconsistent as some of these regions continue to rely on the old systems, which are paper based.

Theoretical Framework: Discretion, Zoning & Clearance Regimes

Discretion Within The Administrative Law

It was called the concept of discretion which means the leeway provided to the decision-makers (most of the times in the executive branch) to interpret and apply regulatory norms. Although discretion is required when dealing with complex and variable contexts, it is also associated with a risk of abuse: non-enforcement of rules, favouritism, capture of regulators by regulates or creative facilitation of non-compliance. Indicatively, a research on the forestry bureaucrats in Java, Indonesia discovered that frontline officers were discretionary in creative regulatory (non-application or persuasion rather than enforcement) and passive facilitation- (inaction) modes [5].

Zoning and land-use control

Spatial governance, which involves zoning laws and land-use regulation, are used to define what is allowed on a particular piece of land, to provide a share of facilities to the populace, green belts, industry or residential areas, etc. It has been repeatedly declared in India that such grants of licence or permission which violate the earmarked land-use category are unconstitutional insofar as they lead to the displacement of the right to a healthy environment (under Article 21). Spatial governance, which involves zoning laws and land-use regulation, are used to define what is allowed on a particular piece of land, to provide a share of facilities to the populace, green belts, industry or residential areas, etc. It has been repeatedly declared in India that such grants of licence or permission which violate the earmarked land-use category are unconstitutional insofar as they lead to the displacement of the right to a healthy environment (under Article 21).

Increasing Corruption In Land Allocation, Registration And Transfer

The Indian land is not merely a source of economic strength but a basic reference to social identity, security and power. Nonetheless, allocation, registration, and transfer of it are now grossly compromised by corruption, bureaucracy, and discretionary abuse of power. The practical operation of the land laws often becomes prey to malpractices that distort equitable land distribution and undermine the law.

Also, it contributes to unlawful intrusion, fraudulent registration, benami transaction, and abuse of discretionary power by the officers of the state. The major laws governing the allocation and registration of land in India are

Codes of Revenue Land Revenue Acts of states,

- The Registration Act 1908,
- The Transfer of Property Act 1882,
- The Indian Stamp Act 1899,
- Benami Transactions (Prohibition) Act (amended 2016).
- Corruption Prevention Act, 1988.

Although these laws were designed to bring legal certainty and transparency, poor enforcement systems, administrative discretion and lack of real time land records have led to institutional corruption.

Nature And Forms Of Corruption.

1. **Allocation of Land-manipulation:** Political and bureaucratic conspiracies in the distribution of state territory to the private. Uncontrolled development of agricultural land to non-agricultural land in the name of the public interest.
2. **Malpractices:** Manufacturing of ownership papers. The cooperation of sub-registrars, revenue officials and middlemen. And under-assessment of property to avoid stamp duty.
3. **Fraudulent Land Transfers:** Fraudulent use of identity documents. Signatures faked and impersonation at the registration offices. Sale of tribal or ceiling-surplus land to non-eligibles.
4. **Benami and Proxy Ownership:** Concealment of real ownership using benami to clean illegal money or evade ceiling regulations.

Legal And Institutional Analysis Of Land Allocation Scams

Nature and Modus Operandi of land Scam

Land allocation is not a case of accidental or single-officer corruption; rather it is a systemic and structural corruption that is embedded on discretionary ownership in the hands of public authorities on valuable immovable resources. In India, land scams are normally associated with the collusive nexus of politicians, bureaucrats, developers and third parties taking advantage of the loopholes in the procedures and lack of institutional checks of the system

Manipulation of the Land Allotments and Abuse of the Public Land. The most common type of corruption is a result of arbitrary or non-transparent distribution of government land according to discretionary quotas or government schemes. The authorities distort the eligibility rules, underestimate land values, and circumvent the competitive tenders to benefit individuals or companies of their own. This is against the constitutional provision set out under the constitution in the 14 th article that state largesse be given out in a just and fair manner. The reports of the Comptroller and Auditor General (CAG) have repeatedly indicated how government lands which are supposed to serve social welfare like housing of the economically weaker sections (EWS), learning centers or defence forces are stolen to be sold commercially. This is a violation of the doctrine of breach of the public trust doctrine, when the State is the holder of land as a trustee on behalf of its citizens.

Benami transactions and Proxy ownership

The Benami Transactions (Prohibition) Amendment Act, 2016 attempted to put a stop to this practice by providing the authorities with the powers to seize property registered under a fictitious name. However, the enforcement is low because of political favouritism and ineffective record keeping. Benami properties have been mostly associated with money laundering and shell company activities whereby corrupt officials can transfer illegal wealth to physical forms. The practice does not only hinder fiscal transparency but also the fair access to land resources, which contributes to the elite seizure of the state property.

Fraud Registration and Mutation

Common practices include, False sale deeds through forged stamp or signature. Registration of the same property under more than one name. Alteration of land registers with old names in order to legitimize the illegal transactions. Unauthorized mutation done without the knowledge of real owners. Such manipulations are enabled by old manual records keeping systems and lack of real-time data integration between sub-registrar offices and the revenue departments. Although policies such as the Digital India Land Records Modernization Programme (DILRMP) are meant to tackle these vices, their unequal application continues to pose a threat of fraud.

Cases Of Scams

1. Central Bureau of Investigation V Ashok Chavan and others (Fraud in Adarsh Housing Society ,Maharashtra 2010) ^[6]

Adarsh Cooperative Housing Society project was initially sanctioned in 1999 to resettle the military officials and war widows under a cheap housing arrangement but later they found out that the flats were given to highest officials of the bureaucracy politicians with land ownership and environmental clearance regulations. The investigation of CBI has indicated that the norms of the Coastal Regulation Zone (CRZ) were being violated and falsification of documents and abuse of discretionary authorities. In the year 2016 the Bombay High court instructed the building to be demolished, and criminal prosecutions were made against the parties involved

2. Central Bureau of Investigation v Neera Yadav and Rajav Kumar (Con Allotment of Land in Noida Uttar Pradesh) ^[7]

The Noida Land Allotment Scam was a massive scale anomaly in the distribution of industrial and residential land by the New Okhla Industrial Development Authority (NOIDA) to influential constructors and bureaucrats at a throwaway price. Investigations also found that the land-use permissions to industrial development were changed illegally and property values undervalued to create luxury housing projects. The CBI and the Income Tax Department uncovered gargantuan under-pricing and the nepotism, with the top IAS officers and political leaders involved. This case ended with court examination wherein the Allahabad high court highlighted that government property cannot be used in personal gain. This scandal was a revelation of high-level corruption in administrative processes and brought changes in the land allotment process under urban development authorities.

3. Central Bureau of Investigation v Bhupinder Singh Hooda and others (Gurugram Land Scam) ^[8]

One of the most significant cases of land conversion fraud in India was the Gurugram Land Scam which involved high-profile political leaders, such as a former Chief Minister Bhupinder Singh Hooda. The state government has been known to buy large pieces of agricultural land claiming it is of public use at low rates and subsequently to sell it back to the major builders like DLF and Unitech at a high price as a real estate development. These transactions, which were revealed by the CBI, under orders of the Punjab and Haryana High Court, brought huge losses to the exchequer and were also against the Land Acquisition Act, 1894. The fraud highlighted the role of abuse of state power and distortion of land conversion regulations in facilitating land grabbing, and that more rigorous judicial regulation of land acquisition and city sprawl in the fast growing urban areas is necessary.

4. State of Karnataka v B.S. Yeddyurappa and others (Karnataka Land Scam 2010) ^[9]

The Karnataka Land Scam was an unethical process of denotification and redistribution of government land by the Chief Minister then, B.S Yeddyurappa who was accused of offering land to his relatives and close associates on payback basis. This fraud was based on the abuse of the authority of the provisions of the Land Acquisition Act and the Bangalore Development Authority (BDA) Act, according to which prime land in Bengaluru was not used in the interests of society but in favor of individuals. The Lokayukta Report of 2011 by Justice Santosh Hegde revealed the strong nexus between the politicians, bureaucrats and the real estate developers. Yeddyurappa was forced to resign after a outcry and was charged with criminal offences. The case also laid a precedent that allowed the prosecution of elected officials over the misuse of the discretionary powers in the governance of land.

5. Central Bureau of Investigation v B. Ramalinga others (Raju Satyam Land Scam Andhra Pradesh, 2009) ^[10]

The Satyam Land Scam was an important aspect of the greater Satyam Computer Services corporate fraud wherein the founder of the company B. Ramalinga Raju had to falsify and overvalue land records and assets to keep the financial deception afloat. The Maytas Properties real estate subsidiary of Satyam had lied that it owned large pieces of land in and around Hyderabad by using forged documents, encroachment, and unlawful conversion of land. CBI and Enforcement Directorate investigations found out that vast tracts of this land belonged to the government or disputed farmland. The scandal did not only reveal corporate wrongdoings, but also highlighted the involvement of the local land registration officials who facilitated fraudulent registration. This case instigated significant changes in the checking of corporate land ownership and digital land records management, in Andhra Pradesh.

Causes For Fraudulent Documentation And Property Registration

Fraudulent documentation is one of the phenomena at the centre of the corruption in the Indian land governance system. There has been a systematic undermining of property rights integrity by manipulation of land records,

forging of documents and misuse of registration procedures. This part examines how land record management has failed structurally, the loopholes in the law that help perpetuate fraud and the issues that confront digital modernization efforts. It also looks at the evidentiary requirements under Indian law of fraudulent transactions of property.

1. Record Management Weaknesses.

1.1. Obsolete Systems and Lack of Cohesive Digital Records.

The land record management system in India is still based on the colonial-era grounds of a disjointed, paper-based system of documentation and administration. Revenue officers, usually at the village or district level, patrolwaris, tehsildars, sub-registrars keep land records, which are normally maintained manually through the registers, thus causing inconsistencies and making these susceptible to manipulation. The colonial rule of the British provided land survey based on taxation rather than ownership verification. As a result, the footprint of presumptive titles, in which the ownership is the presumed possession, still exists. This renders it legally optional to have several claimants with varying or forged documents, claiming to have ownership of a given piece of land. According to a study by the World Bank (2021), more than 60 percent of the civil cases in Indian courts are land-related disputes and most of them are due to ambiguous titles and falsification of records. Cadastral maps and text data are also not aligned in most of the States, which only contributes to incongruences between the realities on the ground and records. This breeds a good breeding ground of fraudulent transactions and title litigation.

1.2. Dubious Jurisdiction between the Revenue and the Registration Departments.

The management of land documentation is two parallel, and not in a coordinated way, departments, one is Revenue Department, which keeps records of land ownership and mutation, and the other is Registration Department, which is responsible to keep records of property transactions. These organizations are independent and in real-time they do not exchange data. An example is the property sale that can be registered with the Sub-Registrar with the Registration Act, 1908 despite the potential existence of encumbrances, dispute or any previous claim on the same property by the Revenue Department. The fact that these departments are not integrated can result in the double sales, forged conveyances, and unlawful conveyances. This organizational gap has a gap that is easily used by corrupt middlemen, real estate agents and officials.

2. Title Dispute and Document Forgery.

2.1. Common Fake Sale Deeds, Double Registration and Impersonation.

Document forgery is the most widespread type of fraud in land management the manufacture of sale deeds, lease deeds, or power of attorney instruments to transfer property unlawfully. The lack of real time verification at the office of Sub-Registrar is one of the most common ways which is used by fraudsters to buy the property by providing counterfeit identity proofs or by impersonating the real owners. The problem of two-time registration i.e., under the same property, a sale has occurred and registered with other parties has also been known to be rife with cases of Uttar Pradesh, Karnataka and Tamil Nadu.

2.2. Lack of a Final Title System to Land in India.

India adheres to a presumptive title system rather than a conclusive title system, implying that possession and historical possession determines ownership and not a conclusive government guarantee. The State makes certain that the land ownership is accurate but does not certify ownership in a presumptive system. This introduces the element of uncertainty and makes the transactions of the properties susceptible to manipulation. The absence of such a conclusive system in India has led to several reform initiatives. The National Land Records Modernisation Programme (NLRMP) which was subsequently renamed Digital India Land Records Modernisation Programme (DILRMP) was initiated to combine textual and spatial data and shift to a title-based system. Nonetheless, there has been unequal and partial implementation.

3. Digitization and Land Records Programme (DLRMP)

3.1. Goals and Development of the Digital Reforms.

Digital India Land Records Modernization Programme (DILRMP) was launched in 2008 to bring land records, cadastral maps and registration systems together into a single digital database. The objectives were to: Make sure there is real time updating of ownership and transaction records, Do away with forgery potentials by digitalizing title information, Combine the tasks of the Revenue and Registration Departments, and Act towards a regime of conclusive titles. According to the 2023 Report of the Ministry of Rural Development, approximately 93 percent of textual records and 70 percent of cadastral maps were digitized on a national basis. Numerous digital records continue to replicate errors that were in the original paper records and, therefore, digitize corruption instead of eradicating it. Cadastral maps in various States are not connected to ownership information and mutations are not updated automatically on registration. Digitization has not been governance-based, but has been data-based through the Standing Committee on Rural Development (2021), which observed that digitization initiatives do not build accountability mechanisms or systems that allow citizens to give feedback. Digitization, thus, does not reduce fraud by itself, but it makes it easier to access, as long as it is supported by the legal identity of digital titles and legal penalties to manipulation of electronic records.

4. Evidentiary Value and Burden of Prove in Fraudulent Claims.

4.1. Registration Act, 1908: Procedural Safeguards and Loopholes.

The Registration Act of 1908 regulates matters that pertain to registration of property transactions and the granting of procedural protection against fraudulent registration. Section 17 to 35 provide for obligatory registration of conveyances, mortgages and leases and Section 32 to 35 as to who may present a document to be registered, and how the executants are to be identified. In spite of these measures, the exercise is frequently formal and cursory. Sub-Registrars seldom check the validity of an identity or ownership status of the executant other than the basic IDs. In *S.P. Chengalvaraya Naidu v. The Supreme Court* considered in *Jagannath (1994) 1 SCC 1*, that a judgment or decree obtained through a fraud on the court is a nullity, in that case but applied the rule to fraudulent registrations.

Case studies

Centre for public interest litigation v 2G spectrum Case Union of India (2012) 3 SCC 1 (2G spectrum case)^[11]

It was declared that the supreme court that the State was the trustee of the people to all natural resources and the public resources including land and their disposition would not be arbitrary or secret but in the best interests of the people. This is relevant to land allotments where open, fair and competitive procedures should be applied to avoid corruption and favouritism.

M.C. Mehta v. The case of Taj Trapezium, (2004) 6 SCC 588^[12]

The Court noted that the causes of illegal land use changes, encroachments and unauthorized constructions are corruption and the failure of the administration to control land use. It was believed that this dereliction is contrary to the right to life and environment as stipulated by Article 21, which requires strict supervision and accountability in land administration

State of Bihar v. Kameshwar Singh, AIR 1952 SC 252^[13]

It described the ethos of the public purpose and equity in land allocation and acquisition even though the case was early. The Court noted that the State cannot exercise its powers of allocation or acquisition in a discriminatory or arbitrary way.

Common Cause v Union of India 9 SCC 499 (Coal Block Allocation Case 2017)^[14]

It was held that natural resources such as land are national resources, and such resources have to be distributed based on guidelines of equality and trust of the people.

Richie Rich Housing Society v State of Maharashtra^[15]

The Supreme Court ruled that the allocation and sale of 11.89 hectares of forest reserved forest land in Kondhwa Budruk to the private parties which was originally designated for the non forest use was illegal. It ordered the land to be returned to the forest department.

Suggestions And Recommendations

Integrated Land Governance Code: India needs a unified legal framework that combines property registration, land use, and ownership checks to eliminate legal fragmentation.

Torrens System Adoption: Introduce a clear title system where the state guarantees ownership and protects legitimate buyers from fraud.

Institutional Coordination: Set up a National Land Authority to manage records, registration, and disputes all in one place.

Blockchain-Based Record System: Use blockchain to ensure land records are secure, clear, and able to work across different departments.

Strengthened RTI Framework: Improve the Right to Information Act by adding penalties for hiding or falsifying land information.

Technological Modernization: Connect Aadhaar authentication, satellite mapping, and AI analysis for real-time checks of land records.

Judicial and Investigative Reforms: Create Special Land Governance Tribunals and empower independent investigative bodies like the CBI and ED.

Local Governance Empowerment: Decentralize land management by giving Panchayats and Urban Local Bodies proper training and independence.

Digital Evidence Recognition: Update the Indian Evidence Act to allow blockchain and digital forensic evidence in land fraud cases.

Conclusion

The fact that corruption has continued to plague the land governance system in India is a major failure of both the law and government. The intersection of political authority, bureaucratic judgment and personal gain has transformed land, which is a constitutional resource that should be developed evenly, into a tool of personal wealth. The shift that India requires in its effort to regain integrity is to cease the fragmented control over territories to unified governance, presumptive ownership to assured title, bureaucratic secrets to transparency of citizens. The next phase of land policy in India must be characterized by a holistic approach that is based on legal reform, technological integration, institutional responsibility, and ethical governance. Sustainable development can only be realized in India once land system is made transparent, rights based, and justice-oriented system of property governance that will arrive at the constitutional promise of equality and fairness.

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