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**CRIMINALITY OF WOMEN IN INDIA: AN OVERVIEW**

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**ABSTRACT:**

Female criminality has historically received less attention due to the relatively lower involvement of women in criminal activities. However, recent years have presented a different narrative. This paper deals with Female Criminality in India and reviews the present scenario of Women's Criminality in India. This paper focuses on the consequences of criminality on society and the factors that are causing the criminality of women in India. Some significant and relevant suggestions or recommendations have been provided to prevent and control the increasing trend. This paper tries to bring out certain measures that can be adopted to bring about a significant positive change to the rate of crimes committed by women.

**Keywords: Female Criminality, Criminology, Crime, India, Gender Disparity.**

**INTRODUCTION:**

*Promoting the empowerment of women not only contributes to the growth of our economy but also enhances the overall development of our nation. It is imperative to ensure that... An individual is advocating on their behalf.*<sup>1</sup> - President Barack Obama

The historical record demonstrates that women have played a fundamental role as the cornerstone of both familial and societal structures. In the context of India, women are commonly regarded as the upholders of societal norms, traditional rituals, moral values, and the unity of the family unit. In contemporary society, women have assumed an additional burden of establishing their individuality and leaving a lasting impact, while also fulfilling their familial duties. Nevertheless, it is disheartening to observe that women's accomplishments are also increasingly associated with criminal behavior within the social, cultural, economic, and political context of India.<sup>2</sup> The prevalence of female criminality in India is on the rise, along with the escalation of crimes against women. The matter has escalated to a concerning extent,

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<sup>1</sup> President Barack Obama

<sup>2</sup> Allendorf, Keera. "Women's Agency and the Quality of Family Relationships in India." *Population research and policy review* vol. 31,2 (2012): 187-206. doi:10.1007/s11113-012-9228-7

prompting socially conscious experts to direct their attention towards the underlying factors contributing to the increasing involvement of females in criminal activities. The phenomenon of female criminality has been characterized in theoretical discourse as a complex issue that is not fully comprehended and is susceptible to simplistic attempts at management. The social context has a significant role in the formation of female offenders.

### **RESEARCH PROBLEM:**

Women have always been regarded as the guardians of societal values. However, during the past decade, there has been a noticeable increase in the number of women engaging in unlawful activities and committing crimes on a global scale. India is not an exception in this regard. The incidence of female criminality in India has shown a significant surge. There may exist other factors contributing to this observed rise. They engage in various criminal activities. The transformation of social norms and values, together with the intricate patterns of culture within the context of human existence, may be primarily attributed to this shift. The issue at hand is significant due to its implications for familial dynamics, child-rearing practices, and the broader social structure. When a female perpetrates a crime, it engenders consequences not just for herself, but also for her spouse, children, family members, relatives, neighbors, and the broader society. In contemporary society, there has been an observable increase in the involvement of women in various criminal activities, facilitated by the utilization of advanced methodologies.

### **RESEARCH QUESTIONS:**

- What factors lead women to engage in criminal behavior?
- Whether there is a need for a new approach to prevent female criminality?
- Whether the laws regarding women's criminality are effective in India?

### **AIMS AND OBJECTIVES OF THE STUDY:**

- To understand and highlight the involvement of women in crimes.
- To know the current scenario of women's criminality in India.
- To propose viable solutions to address these challenges.

### **RESEARCH HYPOTHESIS:**

The legislation does not have the influential and problem-solving effect, it is rather creating issues. They are not very effective in controlling crimes. Lack of understanding and developments of theories of criminology failed to consider the role of women, as both victims and offenders.

### **RESEARCH METHODOLOGY:**

The Research Methodology undertaken in this study is doctrinal. The Approach of study resorted to analytical. The data which is referred to in this study is secondary data that is collected through online and offline sources like articles, journals, books, etc. The study is also been focused on the status of India regarding women's criminality. Further, the Bluebook 19<sup>th</sup> Edition citation format has been followed for reference purposes.

### **CHAPTER 1: FEMALE CRIMINALITY IN INDIA:**

*“The field of criminal law has historically exhibited a notable emphasis on men and their perspectives, a trend that has persisted over several centuries. This legal framework, which was originally devised and implemented by men, primarily caters to the interests of men while simultaneously acting against them.”<sup>3</sup>*

Discrimination is pervasive throughout Indian society, persisting from the moment of birth till the end of one's life. In Indian patriarchal society, there is an expectation for women to assume the role of safeguarding societal norms and serving as the bedrock of the family unit. Despite the implementation of various constitutional reforms, this segment of society continues to face challenges in achieving gender equality on a par with males. It is plausible that the presence of prevailing social norms and patriarchal structures may impede the realization of opportunities afforded by legal frameworks. The primary catalyst for criminal behavior, regardless of gender, is the deprivation of rights and economic frustration. In the contemporary competitive landscape, women are more confronted with these obstacles, which are compelling them to engage in illicit activities. Undoubtedly, women have historically endured victimization throughout the ages, and this enduring victimization has resulted in a transformation whereby they are now assuming the role of victimizers. *Phoolan Devi serves as a prominent illustration of a victim who transitioned into a perpetrator.* The narrative of her role as an aggressor

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<sup>3</sup> Sahil Malhotra, Analysis of Female Offending in India, (Jan 10, 2018, 01:40 AM), <https://criminallawstudiesnluj.wordpress.com/2019/06/05/analysis-of-female-offending-in-india/>

commences with the legal system's failure to administer justice to her. Phoolan Devi, who was denied justice, then transformed into an infamous bandit queen before transitioning into a career in politics.<sup>4</sup> Nevertheless, throughout her brief and tumultuous existence, she managed to accumulate a substantial number of adversaries, ultimately leading to her untimely demise. *Shantadevi Patkar, a renowned drug dealer, might be regarded as a victim of both spousal abuse and impoverished circumstances.* The notion of generating income through illicit drug trafficking swiftly permeated her thoughts, ultimately leading her toward a path of illegal behavior.<sup>5</sup> Therefore, it may be argued that poverty and a history of abuse play a significant role in the propensity of women to engage in criminal behavior within the Indian social context. The participation of women in various aspects of society is progressively expanding, as evidenced by the available data in India and other regions. This trend is also observed in the realm of criminal activity. *They referred to a highly memorable assertion which is, “Rights are first asked for, then ordered, and then ultimately snatched.”*<sup>6</sup> In the pursuit of securing or safeguarding rights, conflicts often arise, leading to instances of criminal activity. Nevertheless, in economically underdeveloped nations, this ratio is approximately four times higher than that observed in economically affluent countries. This suggests that industrialized civilizations exhibit a reduced disparity in the male-to-female ratio of criminal activity. Therefore, the remarkably low rates of criminal offenses among Indian girls may be attributed to the constraints imposed by their marginalized social status, which potentially limits their capacity to begin or participate in illegal activities. Recommendations for future research were provided across various aspects of female criminality and the criminal justice system.<sup>7</sup> Over time, women have experienced a decline in confidence in the prevailing social structure because of unjust subjugation that encompasses the restriction of their ability to articulate their aspirations within society. The perception of women remains confined mostly to domestic roles, despite their access to education. The prevailing belief persists that a woman's primary responsibility lies within the confines of her domestic sphere, with all other pursuits being of lesser importance. Despite the legal provision of equal status for men and women, the actual

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<sup>4</sup> Sarika Baloda, Women, Crime, and the Indian Justice System, Volume II Issue I, Symbiosis Law School, Nagpur Multidisciplinary Law Review, P. 53-63, 2022, <https://www.slsnagpur.edu.in/assets/pdf/journal/Women-Crime,-and-The-Indian-Justice-system-Sarika-Baloda.pdf>.

<sup>5</sup> *Id.* at 1072.

<sup>6</sup> ANJU BAJPAI & P.K. BAJPAI, FEMALE CRIMINALITY IN INDIA (2000).

<sup>7</sup> Mili, P. M. K. et al. “Female Criminality in India: Prevalence, Causes and Preventive Measures 1.” International Journal of Criminal Justice Sciences 10 (2015): 65.

situation on the ground does not align with this principle. *In the Indian Young Lawyers Association and Ors v. State of Kerala and others*,<sup>8</sup> In the state of Kerala, there exists a temple that adheres to a longstanding practice of excluding women who are in the menstrual age from accessing its premises. The court was presented with a petition challenging the practice in September 2018. The Supreme Court ruled that women of all age categories have the right to enter the Sabarimala Temple. The court first rescinded the restriction, finding that it was an infringement of women's freedom to exercise their religious beliefs.

During the decade from 1968 to 1973, there was a notable increase of 52 percent in the number of arrests made for *serious crimes* among women, encompassing offenses such as auto theft and murder. In contrast, the corresponding increase for men during the same timeframe was a mere 8 percent. There has been an observed increase in the arrest, conviction, and imprisonment rates of women for major offenses, as documented by Price (1977).<sup>9</sup>

### ***Is there an increase in the number of women coming into conflict with the law?***

On 19 July 2014, President Pranab Mukherjee rejected the mercy petition of serial killers Renuka Shinde and Seema Mohan Gavit.<sup>10</sup> This was after the Supreme Court on 31 August 2006 confirmed the death sentence on the two half-sisters for killing five children between 1990 and 1996 in Maharashtra's Pune, Kolhapur, and Nashik cities.<sup>11</sup>

According to the ruling of the highest court, the acts of violence, which involved the killing of a kid by forcefully striking their skull against an electricity pole, exemplified a morally corrupt mindset that engaged in indiscriminate homicides without any external influence or coercion. Additionally, ***it is said that while examining the specifics of the case, no factors that could potentially lessen the severity of their actions were found, except for their gender.***<sup>12</sup>

A recent study from the National Crime Records Bureau says that the most women imprisoned under the Indian Penal Code (IPC) are from Maharashtra (28,029), subsequently followed by

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<sup>8</sup> In *Indian Young Lawyers Association and Ors v. State of Kerala*, (2018) S.C.C. 1690.

<sup>9</sup> B.K Nagla, *The Criminality of Women in India*, THE INDIAN JOURNAL OF SOCIAL WORK, ( Jan 10 2018, 01:40 AM), <http://ijsw.tiss.edu/greenstone/collect/ijsw/archives/HASH062f/c4fe4a5e.dir/doc.pdf>.

<sup>10</sup> makeupexhibit, <https://makeupexhibit.wordpress.com/2021/03/02/serial-killer-sisters-renuka-shinde-seema-gavit/>, (last visited Oct. 28, 2023).

<sup>11</sup> Ashwaq Masoodi, *Increase in number of women coming in conflict with the law*, LIVEMINT, ( Jan 10 2018, 01:40 AM), <https://www.livemint.com/Politics/5XJa3pu9i1OrJFPonVFRfL/Increase-in-number-of-women-coming-in-conflict-with-the-law.html>.

<sup>12</sup> Terrence McCoy, *Murderous sisters to hang in India's first execution of women*, THE WASHINGTON POST, (Jan 10 2018, 01:40 AM), <https://www.washingtonpost.com/news/morning-mix/wp/2014/08/19/murderous-sisters-to-hang-in-indias-first-ever-execution-of-women/>.

MP (22,587) and then Tamil Nadu (21,959). The most women, however, have been found guilty in Tamil Nadu (6,297), followed by MP (2,521) and Maharashtra (2,499). In contrast, it is noteworthy that Uttar Pradesh ranks highest among Indian states in terms of the number of male individuals detained under the Indian Penal Code (IPC), with a total of 546,874 arrests. Conversely, the corresponding number of female arrests in the same state amounts to 19,334.<sup>13</sup>

## **CHAPTER 2: FACTORS AFFECTING FEMALE CRIMINALITY:**

The biological explanations proposed by early criminologists were found to lack empirical support and do not apply to women in the context of India. There is a correlation between higher levels of education among women and an increased propensity to engage in criminal activities, which can be interpreted as a manifestation of resistance against conventional limitations and societal expectations related to gender roles. However, this assertion does not hold within the Indian context, as the imposition of additional constraints has inadvertently led to an increase in the magnitude of criminal activities.<sup>14</sup>

### **Nature of crimes committed by women:**

Historically, women have predominantly been associated with engaging in minor offenses, including but not limited to acts such as stealing and involvement in prostitution.<sup>15</sup> Currently, women are involved in a wide range of criminal activities, including but not limited to adultery, extortion, forgery, kidnapping, drug trafficking, murder, marital crimes, pickpocketing, smuggling, theft, and terrorism.

*The phenomenon of women engaging in criminal behaviour is often perceived as a deviation from traditional feminine roles, with potential causes stemming from biological, psychological, social, or environmental factors.*

- **Biological Viewpoint:** the work of Caesar Lombroso is widely regarded as the seminal contribution to the scientific examination of female criminal behaviour. *He perceived female deviation as originating from the biological composition or as an intrinsic*

<sup>13</sup> Ashwaq, *Supra* Note 9., at 1072.

<sup>14</sup> Manasvi Gupta, Gender and Crime: A Feminist Perspective, Vol. 3, Issue 6, International Journal of Law Management & Humanities Page 1007 -1018 2020, <https://www.ijlmh.com/wp-content/uploads/Gender-and-Crime-A-Feminist-Perspective.pdf>

<sup>15</sup> Snehal Asthana, Female Criminality in India, (Jan 10, 2018, 01:40 AM), <https://www.rgnul.ac.in/PDF/f7ff0636-9075-47f2-8e17-a5ba7be7a3cf.pdf>.

*characteristic of the feminine gender*".<sup>16</sup> According to the individual's statement, female criminals are deemed to be more severe than their male counterparts due to the perception that acts of cruelty committed by women are characterized by a greater level of sophistication and male violence. Lombroso believed women were ethically weak, morally inferior to children, and intellectually inferior, which explained their low crime rates. Lombroso and Ferrero (1895) believed that all antisocial people were biological throwbacks. People thought that a woman who was born a thief had the worst traits of both men and women. But we think that Indian women are more likely to commit crimes because they are socially or economically poor than because of their genes.

- **Psychological Viewpoint:** Women who are not passive and happy with their traditional roles as moms and wives are ill-adjusted. Women who aren't well-adjusted don't accept or understand the values that come with their place in society. Women who are in prison show signs of mental instability, insecurity, rejection, or anger.<sup>17</sup> Individuals in this context would have likely confronted challenging living situations, experienced romantic disappointments, and endured a multitude of bad events. These collective experiences would have generally posed difficulties in their ability to confront the reality of life. On average, women have more stress than men. This is mostly because of missed chances and the mixed messages about motherhood and work. On average, women with less social status are more stressed than women with more social standing.
- **Sociological Viewpoint:** In the last few decades, there have been a lot of books and articles written from a social point of view. This point of view emphasizes how social factors can cause a woman to become a thief. Even though India has grown and become more aware, women still face discrimination at every stage of life. The Constitution of India says that women should have the same rights as men, but this is not the case. Because of imbalance, women miss out on most of the chances in life. This makes it harder for them to be financially independent, which lowers their economic status. In Indian culture, women are always expected to understand and adapt to what is going on around them. Due to social oppression and the fact that they rely on men and the government for money, women are not treated equally in society.

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<sup>16</sup> Neethu Susan, Female Criminality in India: Prevalence, Causes and Preventive Measures, 10 IJCS, 65, 65-76 (2015), <https://www.proquest.com/docview/1692045475>.

<sup>17</sup> *Id.* at 1073.



- **Physiological Viewpoint:** According to the assertions of certain academics in India, the premenstrual period is the most stressful time of the month for women, and about half of those who experience it are criminals during the time of their symptoms.<sup>18</sup>
- **Industrialization And Modernization:** The decline of traditional social control systems has been observed because of industrialization and modernization.<sup>19</sup> The emergence of female criminality is believed to stem from the rapid societal transformations that have occurred, transitioning from traditional norms to more progressive and innovative practices. The conflicts arising from the juxtaposition of social goals and the institutional means available to achieve them give rise to hostility, resulting in deviant behaviour among women.<sup>20</sup>

### **Are women considered only victims?**

#### **“She is a woman she is subject to victimisation.”**

In academic discourse, there exists a prevailing assumption that women are typically perceived as incapable of assuming the role of predators, instead being viewed solely as victims. This mindset can be attributed, in part, to how offenses are defined and understood.<sup>21</sup> As time progresses, instances of criminal activity are on the rise. It is important to note that criminal behaviour is not contingent upon gender, as both males and females can assume the role of perpetrator.

In the context of India, gender is a significant determinant when assessing the severity of punishment. The role of women as the cornerstone of the family and their responsibility for domestic affairs is traditionally expected to be characterized by piety and morality. This particular mentality mostly contributes to the underreporting of female offenses and the issuance of reduced penalties. The Indian prison system adheres to the reformatory theory of punishment, which emphasizes the condemnation of the offense rather than the individual responsible. When sentencing an offender, it is anticipated that judges will assess the balance between aggravating and mitigating elements to determine the appropriate equilibrium.<sup>22</sup> The

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<sup>18</sup> Anupama Kaushik, Women Criminals: Case Study from India, Volume 1 Issue 2, Multidisciplinary Journal of Humanities and Social Sciences 1-15, 2015, <http://www.sncwgs.ac.in/wp-content/uploads/2015/01/2-WOMEN-CRIMINALS.pdf>.

<sup>19</sup> N.V PARANJAPE, CRIMINOLOGY AND PENOLOGY (2007).

<sup>20</sup> Sneha, *Supra* Note 15, at 1074.

<sup>21</sup> Gender biased laws in India: Why are only women considered victims?, (Jan 10, 2018, 01:40 AM), <https://blog.finology.in/Legal-news/gender-biased-laws>.

<sup>22</sup> Sarika, *Supra* Note 4, at 1074.

examination of significant cases in which Indian courts have provided obiter dicta can enhance our comprehension of the sentencing process employed when dealing with female criminals. In the case of *The Registrar General v/s Mallika alias Lakshmi*<sup>23</sup>, K.D. Kempamma was found guilty of many counts of murder, so he became the inaugural female recipient of capital punishment in independent India. However, this sentence was subsequently commuted to life imprisonment. The individual's criminal actions were primarily driven by a desire for money gain and material opulence. The Karnataka High Court, in the context of a criminal appeal against a death sentence handed down by the trial court, decided to reduce the penalty to life imprisonment. In reaching this decision, the court took into account the gender of the accused, recognizing that this should not be used against her, but rather should be viewed as a mitigating factor in her favor.<sup>24</sup>

*However, there have been cases in which courts have implicitly taken gender into account as an exacerbating factor in this regard.* The courts have occasionally exhibited gender discrepancies in their judgments, which can be attributed to the influence of gender norms and societal expectations. The Supreme Court thought it peculiar that a woman, who was herself a mother, resorted to the act of burning her daughter-in-law alive. This act of violence committed by one woman against another woman was deemed unusual by the court. The court deemed the consideration of sympathy as inappropriate for the administration of justice, even though the applicant had previously served a ten-year prison sentence.<sup>25</sup>

The consideration of an individual's gender, specifically being female, should not serve as a determining element in the mitigation or aggravation of a sentence. Such an approach would perpetuate the notion of females as a weaker gender or as being bound by specific societal obligations.

### **CHAPTER 3: RECOMMENDATIONS:**

#### ***Is there a need for a new approach to prevent female criminality?***

The subsequent measures and steps outlined herein are deemed beneficial for the prevention of female criminality within the context of India.<sup>26</sup>

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<sup>23</sup> The Registrar General v/s Mallika alias Lakshmi, (2012) S.C.C 8798.

<sup>24</sup> *Id.* at 1075.

<sup>25</sup> Sarika, *Supra* Note 4, at 1075.

<sup>26</sup> Snehal Asthana, Female Criminality in India, ylcube, (Jan 10, 2018, 01:40 AM <https://ylcube.com/c/blogs/female-criminality-india/>)

- Crime Prevention Programmes at the Community Level
- Interdisciplinary research in the field of women's criminality.
- The modification of existing legislation
- • Monitoring gender discrimination within families, educational, and occupational settings
- Learning Programs for Female Offenders and Rehabilitation
- Reformation of the criminal justice system
- Rehabilitation and Reintegration
- Responsible Media
- Sex Education
- The equitable distribution of social and household responsibilities between men and women, rather than their rigid delineation.

It is of the utmost importance to develop efficient methods for the care, rehabilitation, and reintegration of female criminals. The researchers who develop these methods, as well as the academic community and the general public around the world, should give prompt consideration to the findings of any research or publications that are specifically related to female criminality. As a result of the significance of women to humanity, to the growth of nations, and to the continuation of civilization, each person has a responsibility to contribute to the growth and prosperity of women by removing all of the obstacles that stand in the way of their progress.

## **MEASURES:**

### ***Preventive measures***

The adage "prevention is better than cure" holds in the context of crime prevention, particularly in a huge and diverse country such as India. Crime prevention involving females in India poses a significant challenge because of the inherent difficulty in identifying vulnerable regions and individuals, particularly women.

- It is imperative to provide illiterate women with a comprehensive understanding of the societal role of women, their rights, and the corresponding legal framework.
- Social service and adult education units should be responsible for imparting legal awareness to individuals, ensuring they are knowledgeable about unlawful actions, and encouraging them to report such activities or refrain from engaging in them.

- Sex education plays a significant role in addressing the issue of women's involvement in criminal activities, particularly about their limited awareness of sex trafficking and the commercial sex industry. Furthermore, it is imperative to be knowledgeable of the more stringent legislation about involvement in such illicit activities.
- The promotion of a constructive social action movement aimed at raising awareness is of utmost significance. To mitigate interpersonal conflicts within families and societies, it is recommended that couples and families partake in pre-marital and post-marital counseling sessions.
- Domestic violence cases need to be dealt with harshly so that it doesn't happen again, and the rules against dowry need to be followed correctly.<sup>27</sup>

### **Rehabilitative measures:**

A female criminal should be given a chance to take care of her children as part of rehabilitative and helpful measures.

- Care should be taken to give female prisoners the right medical care and even help them get back on their feet. If a female criminal has a mental illness and comes out of jail after serving her time, she would probably keep committing crimes because she still has the problem, and who knows, it might have gotten worse.
- The children of mothers who are in jail should be taken care of, or the mothers should be able to talk to their children and other family members.
- Women should be able to get legal help since most of them end up in jail through no fault of their own.

### **CONCLUSION:**

Both criminal activity and criminals have been a part of civilization since the beginning of time. On the other hand, until quite recently, only men were responsible for committing those crimes. In older societies, the idea that female criminality posed a special challenge to society was widely held. Since those decades have passed, the situation has evolved. Many people believe that the growing criminal activity among women in today's society represents a reaction, a retaliation, or the ultimate method of self-preservation. The effects of illegal

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<sup>27</sup> Meli & Cherian, *Supra* Note 6, at 1077.

behavior committed by women can be evident not only on the person and her family but also on society. As a result, there is a pressing need for additional research to be conducted on this subject, and laws should also be revised properly.



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