

Mob Lynching in India: An Exploratory Study with Special Reference to India

Dr. Surendra Singh Chundawat¹ and Mr. Vikram Singh Yadav²

Assistant Professor¹ and Research Scholar²

Janardan Rai Nagar Rajasthan Vidyapeeth (Deemed to be University), Udaipur, Rajasthan, India

Abstract: *Mob lynching is the act of individuals disregarding legal procedures to enforce their distorted concept of justice, which frequently leads to the violent murder of others and a grave infringement of basic human rights. This occurrence signifies a notable deficiency on the part of the government, which, being a party to many international agreements and treaties, is required to avoid such transgressions and preserve the basic rights provided by its Constitution.*

This study seeks to analyse instances of mob lynching in India, with a specific emphasis on incidents motivated by religion, caste, and gender prejudices. It underscores the way in which these instances exemplify a fundamental societal problem and a breakdown in government. The research will examine prominent instances of mob lynching in India, offering a thorough examination of the underlying reasons behind these crimes and their devastating outcomes.

In addition, the study will examine the pertinent International Humanitarian Laws that are being breached in these occurrences. The purpose of these laws is to safeguard human rights and uphold justice. The violation of these laws in instances of mob lynching highlights a significant area where the State is failing to fulfil its obligations.

Furthermore, the study will rigorously evaluate the current Indian legislation pertaining to mob violence. The study will analyse these legislation to see if India is meeting its international duties to prevent human rights breaches. It will inquire as to why, despite the existence of these laws, there has been an increase in occurrences of mob lynching.

This study aims to comprehensively examine mob lynching in India, analysing the State's inadequacy in stopping these crimes and discussing the wider consequences for human rights and justice. The research seeks to make a valuable contribution to the discussion on how India may enhance the protection of its citizens and uphold its international obligations by bringing attention to these challenges.

Keywords: Mob Lynching, Human Rights, Legislation, International Obligations

I. INTRODUCTION

“Human rights are inherent and indivisible rights that are crucial for every person, irrespective of their race, religion, gender, nationality, or social status”¹. These rights are globally recognised and available to all persons. They are mentioned in several treaties, covenants, conventions, and resolutions. “The Constitution is the fundamental basis of Indian legislation, aiming to conform to international human rights norms by including concepts of ethics, fairness, rationality, and natural justice”². “The objective is to guarantee that every person is afforded basic rights necessary for their existence, such as the right to life, liberty, religion, non-discrimination, and equality, among other rights”³. “Nevertheless, the Indian state has consistently infringed against these rights, as seen by the continuous escalation of communal tensions, caste disputes, and incidents of gender-based violence”⁴.

¹ DR. SK KAPOOR, INTERNATIONAL LAW AND HUMAN RIGHTS 806 (19th ed. 2014).

² Mr. Upendra Grewal & Dr. Shilpi Gupta, Lynching And Human Rights: An Analytical Study In Indian Perspective, IV IJLLR 1, 1-9 <https://www.ijllr.com/post/lynching-and-human-rights-an-analytical-study-in-indian-perspective>.

³ INDIA CONST. art. 14, 15, 16, 21, 25 & 26.

⁴ GUPTA, supra note 2.

These occurrences not only reveal the declining state of the legal system inside the Indian political system to the outside community, but also undermine the confidence of its population. “An illustrative instance is mob lynching, a long-standing global phenomenon that has shown a substantial surge in India in the last two decades”⁵.

This research aims to examine the roots of mob lynching and emphasise its prevalent occurrence in India. This activity will be identified as breaching international treaties, conventions, and commitments, as well as Indian legal and constitutional laws. In conclusion, the article will demonstrate India's inadequate attempts to control mob lynching, highlighting the need for the government to take aggressive actions to maintain both constitutional morality and popular sovereignty. Undertaking this action is crucial for meeting its responsibilities to both its residents and the international community.

What is the definition of mob lynching?

Charles and William Lynch developed the name “Lynch Laws” during the American Revolution, with the word “lynch” recognised as its etymological source.

“René Girard, a French sociologist, defined mob lynching as a form of violence that involves three distinct stages and is driven by the need to find a scapegoat”⁶. “More precisely, these steps encompass the process of categorising a crisis based on preconceived notions, defining the nature of the charge, and eventually choosing the target of the accusation”⁷. Essentially, mob lynching refers to the situation where a group of people, who do not possess official power, assume the role of an improvised court to pronounce judgement on an individual's activities. It is distinguished by irrationality, disproportional behaviour, barbaric tendencies, and unpredictability. The motivations behind mob lynching can range from racist prejudices to gender biases, frequently driven by unchecked radical ideologies that unfairly single out innocent victims. This undermines the fundamental values of fairness and the legal system, questioning the validity of the judicial system itself and, if not addressed, might result in a state of lawlessness.

“The ex-Chief Justice of India characterised mob lynching as an abominable display of mob rule that is not allowed, highlighting its global condemnation and its infringement against several agreements, treaties, and fundamental principles of international humanitarian law”⁸.

These infractions include breaches of the rights to life, freedom, religion, non-discrimination, and protection against torture, among other rights. Furthermore, it contradicts the well acknowledged concept of “Ei incumbit probation qui dicit, non qui negat”⁹.

II. MOB LYNCHING IN INDIA

Despite the government's genuine endeavours, as will be further shown, mob lynching continues to prevail in India. This portion of the study will examine many cases of mob lynching in India, which have been motivated by variables such as religion and gender.

III. RELIGION BEING THE DRIVING FORCE

Cow Vigilantism:

The Dadri lynching of 2015 is seen as the first instance of cow vigilantism developing into violence. This incident sparked a sequence of mob lynchings disguised as “gauraksha” or cow protection. “In Dadri, a defenceless Muslim person called Mohammad Akhlaq was forcefully abducted from his residence and lethally attacked by an aggressive Hindu crowd”¹⁰.

⁵ RENE' GIRARD, THE SCAPEGOAT (1986).

⁶ Ibid.

⁷ Id.

⁸ Tahseen S. Poonawalla v. Union of India, (2018) 9 SCC 501.

⁹ Id.

¹⁰ Tanvi Yadav & Nagendra Ambedkar Sole, Mob Lynching In India: Sine Qua Non Of Legal Intervention, 4 ALPR (2019).

The origin of this may be traced back to rumours spread by a neighbouring Hindu temple, claiming that Akhlaq's neighbour had personally observed him butchering a young cow. Subsequently, a multitude of banners advocating violence against anyone involved in cow slaughter were prominently exhibited around the city. "In a later occurrence in Jharkhand in 2016¹¹, a Hindu mob brutally assaulted and killed two Muslim cattle dealers, one of whom was a 12-year-old child. The bodies of the victims were subsequently discovered hanging from a tree".

In the next year, in Nuh District of Haryana, a dairy farmer and six individuals accompanying him, including his father, were put to torment by a group of 200 gaurakshaks. "Although the farmer provided compelling proof to support their innocence, their testimony was disregarded, and their father endured such brutal assaults that he ultimately succumbed to his injuries"¹².

Palghar 2020¹³

Undoubtedly, one of the most flagrant cases of lynching during the epidemic took place when two sadhus were erroneously charged with the abduction and illegal removal of organs from youngsters, driven by a rumour disseminated on WhatsApp. During their journey back to their residence, they were stopped by a patrol in Palghar district, Maharashtra. While their van was halted, a collective of Muslim and Christian merchants initiated a pursuit and physical attack on the sadhus. Despite being informed about the situation, the police did not take any action to prevent the priests from being lynched once they were forcibly removed from the police vehicle.

Bhiwandi 2006¹⁴

Two Hindu police officers in the Thane region of Maharashtra were killed by a furious mob of Muslims who blamed them for the deaths of two Muslim prisoners.

CAA and attack on Muslims¹⁵

Following the implementation of the Citizenship Amendment Act (CAA), which is perceived as discriminatory due to its provision of fast-tracked citizenship for major South Asian religions except Islam, several instances of violent lynching were reported around the country. In Delhi, Hindu mobs, filled with anger, screamed slogans such as "Jai Sri Ram" and "maro sale mulleko" while participating in a series of lynchings. These violent acts were triggered by an inflammatory speech delivered by the Home Minister.

HONOUR KILLINGS, GENDER HEIRARCHY AND CASTE BASED VIOLENCE

Honour killing refers to the intentional death of someone who are thought to have caused shame or disgrace to their families' reputation and dignity. Driven by religious, caste-based, and other social inequalities, these homicides are frequently characterised by extreme violence, with women being the principal victims.

"Prominent instances of honour murders motivated by caste discrimination and misogyny include the Manoj Babli case"¹⁶. In this scenario, Manoj and Babli, who come from different castes, made the decision to elope. After being

¹¹ NL Team, Police weakened case against gaurakshaks: Report on Latehar lynching, NEWS LAUNDRY, April 3, 2018, <https://www.newslaundry.com/2018/04/03/police-weakened-case-gau-rakshaks-sahi-report-https://www.newslaundry.com/2018/04/03/police-weakened-case-gau-rakshaks-sahi-report-latehar-lynching%20ramgarh#:~:text=Twelve%2Dyear%2Dold%20Imtiaz%20Khan,in%20the%20state's%20Latehar%20district.>

¹² Suhasini Raj, Hindu Cow Vigilantes in Rajasthan, India, Beat Muslim to Death, THE NEW YORK TIMES, April 5, 2017, <https://www.nytimes.com/2017/04/05/world/asia/india-cow-mob-hindu-vigilantes.html>.

¹³ Palghar Lynching: Maha govt warns against floating 'communal angle', says attackers and victims were of 'same religion, DNA INDIA, April 20, 2020, <https://www.dnaindia.com/india/report-palghar-lynching-mahagovt-warns-against-floating-communal-angle-says-attackers-and-victims-were-of-same-religion-2821742>.

¹⁴ US DEPARTMENT OF STATE, INTERNATIONAL RELIGIOUS FREEDOM REPORT (2008) <https://2009-2017.state.gov/j/drl/rls/irf/2008/108500.html>.

¹⁵ <https://www.theguardian.com/world/2020/mar/01/india-delhi-after-hindu-mob-riot-religious-barred-nationalists>.

found by their relatives and presented to the khap panchayat, a caste-based council of Jats, the couple was condemned to death for challenging social conventions. Later, they were kidnapped by a bunch of family members and savagely killed.

Although the court finally imposed the worst punishment on the offenders, the process of attaining justice was difficult and demanding. Surprisingly, none of the legal representatives were ready to support or defend the victims, and a number of important witnesses refused to cooperate throughout the trial. This significant legal case, which led to the initial imposition of capital punishment for an honour killing, highlights the widespread impact of prejudice based on caste and the state's inability to properly address it.

“In the UdumalaiSankar case¹⁷, Sankar, a third-year engineering student and husband of Kausalya, was fatally assaulted by a mob armed with sickles and machetes”. The motive for this abhorrent deed was Sankar's Dalit status and Kausalya's affiliation with an upper caste.

“In 2015, there was a significant instance of femicide in a rural region about 30 km away from Ranchi”¹⁸. During this occurrence, a group of people forcefully expelled five ladies from their residences and thereafter inflicted lethal injuries against them. The attack was motivated by an unfounded allegation that the ladies had employed sorcery to bring about the demise of a small kid.

IV. INDIA'S EFFORTS TO PREVENT MOB LYNCHING

4.1 Legislative Measures:

The Indian Constitution protects basic rights by including principles of natural justice, such as Audi Alteram Partem, the Self-Incrimination Doctrine, Ex-post facto legislation, and Double Jeopardy, together known as “PNJ”. These rights encompass principles such as egalitarianism, the preservation of life, the liberty to express oneself, and the freedom to practise one's faith. “Furthermore, the Constitution places a duty on the Central government to refrain from violating these rights”¹⁹.

Furthermore, it stipulates that all citizens must be free from any kind of discrimination based on religion, race, caste, sex, or place of birth. Lynching not only contravenes the concepts of due process but also disregards the fundamental rights entrenched in the Constitution. “Consistent with the fundamental values stated in the Constitution, the Indian Penal Code (IPC) and various specialised laws have made efforts to tackle the problem of mob lynching, but mostly in a broad and general way”²⁰.

IPC/BNS

The Indian Penal Code (IPC) has many laws that deal with hate crimes, such as homicide (Section 302), inflicting injury (Section 324), attempted homicide (Section 307), engaging in rioting (Section 147), and participating in an unlawful assembly (Section 141). It also deals with the issue of shared purpose and responsibility that may arise from such activities (Section 34 and 149). In addition, it establishes the offence of rioting (Section 146) and specifies the corresponding penalty for such behaviour (Section 147). Crimes committed to safeguard family honour are expressly addressed in Sections 299 and 301. In addition, there are legal provisions that prohibit actions that are detrimental to national unity (Section 153A) and actions that incite hostility between various groups (Section 153B). Section 295A of the IPC criminalises actions that cause extreme offence or harm to religious sentiments.

¹⁶ Manoj-Babli Honour killing case: This mother challenged dreaded khap; here are chilling details, DAINIK BHASKAR, November 25, 2014, <https://www.bhaskar.com/national/>

¹⁷ Sankar caste killing case: Gowsalya's father Chinnasamy acquitted by Madras HC, THE NEWS MINUTE, June 22, 2020 <https://www.thenewsminute.com/article/sankar-caste-killing-case-gowsalya-kowsalya-fatherchinnasamy-acquitted-madras-hc-127064>.

¹⁸ Five women accused of witchcraft lynched by India mob, AL JAZEERA, August 8, 2015 <https://www.aljazeera.com/news/2015/8/8/five-women-accused-of-witchcraft-lynched-by-india-mob>.

¹⁹ INDIA CONST. art. 14, 21, 25 & 26.

²⁰ Id.

However, it is important to note that the Bhartiya Nayaya Sanhita 2023, which included particular provisions that are identical to those contained in the IPC. Nevertheless, it is probable that the legislation would have measures specifically targeting hate crimes, given the significance of such laws in upholding social cohesion and fairness. The Bhartiya Nayaya Sanhita 2023 is expected to incorporate revised and more extensive regulations to tackle hate crimes, considering the evolving social landscape and legal advancements since the implementation of the IPC.

In terms of procedural matters, the IPC does not explicitly cover the process of jointly charging persons for the same offence. However, Section 223 of the Code of Criminal method (CrPC) delineates the method for such joint charges. The principle states that individuals suspected of the same crime committed at the same event can be jointly prosecuted and tried.

In general, although both the IPC and the Bhartiya Nayaya Sanhita 2023 may have provisions related to hate crimes, the latter may provide more recent and extensive steps to tackle current concerns and difficulties. Furthermore, the CrPC addresses the procedural problems of prosecuting persons together for the same offence.

REQUIREMENT FOR PRECISE LEGISLATION

The broad provisions of the IPC are insufficient to address the intricate problem of mob lynching. There is a clear distinction between a murder motivated by personal animosity or revenge compared to a murder committed to further a shared aim or goal that is influenced by caste, religion, or gender. In response to this problem, the Law Commission has made efforts to tackle it by introducing the Criminal Law Amendment Bill 2017. This bill suggests the inclusion of additional sections, such as Section 135C of the Indian Penal Code, which aims to outlaw the act of inciting hate. The Scheduled Caste and Scheduled Tribe Prevention of Atrocities Act, 2015 is the main legislation in the Indian legal system that addresses hate crimes. It imposes strict punishments on anyone who commit acts of violence against these people.

Nevertheless, there is a conspicuous lack of comparable laws aimed at safeguarding the rights of other marginalised communities on the basis of religion, gender, and other relevant criteria. As a result, hate crimes against these persons frequently remain undetected, necessitating the use of media stories and scientific studies by individuals to collect data that appropriately represents the magnitude of human rights abuses taking place.

STATES INITIATE ACTIONS:

Recently, numerous governments such as Manipur, Rajasthan, and West Bengal have enacted anti-lynching legislation and designated Nodal officials with the responsibility of preventing such hate crimes. These legislations also include rules for providing assistance and support in situations when people are forced to leave their homes or in circumstances of death of victims. They refer to Section 153A of the IPC as the legal consequences for these crimes.

It might be inferred that despite governments' efforts to improve their laws, they are still inadequate. Moreover, it is widely recognised that governments are proficient in creating legislation but frequently have difficulties in executing them. The issue of mob lynching and its enforcement is also faced by the minimal legislation in place.

4.2 JUDICIAL INTERVENTION:

The Indian judiciary has attempted to tackle the problem of mob lynching. In the *Tehseen Poonawala v. Union of India* case, the Supreme Court laid forth specific requirements that both the national and state governments must follow while formulating legislation pertaining to mob lynching. In the *Stephen v. Delhi University*²¹ decision, the Court stressed the need of maintaining harmony by considering different viewpoints, especially in addressing pressing issues linked to cow vigilantism and lynching. The Court urged Parliament to pass suitable laws to address these concerns.

In the case of *Krishnamoorthy v. Sivakumar and Others*²², the Court firmly said that it is unacceptable to take matters into one's own hands for trivial reasons. The Court emphasised that the law, as the highest authority in a civilised community, must not be ignored. The Court, in the case of *Nandini Sundar and Others v. State of Chhattisgarh*²³,

²¹ AIR 1992 SC 1630.

²² AIR 2015 SC 1921.

²³ WRIT PETITION (CIVIL) NO. 250 OF 2007.

emphasised the importance for states to foster a sense of solidarity among all people in order to protect the dignity of every individual. Furthermore, in the case of *ArumuganServai v. State of Tamil Nadu*²⁴, it was mandated that states should take stringent measures against authorities who, although having knowledge of an imminent lynching, neglected to interfere or resolve the situation.

V. VIOLATIONS OF INTERNATIONAL LAW:

The International Bill of Human Rights, created by UNGA Resolution 217 (III), consists of three primary documents: the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR). India has officially approved and accepted all of these papers, demonstrating its dedication to fulfilling its international responsibilities in the execution of justice.

This section of the study will specifically emphasise the several infringements of international humanitarian law that are linked to mob lynching.

5.1. Universal Declaration of Human Rights(UDHR)

As per the Universal Declaration of Human Rights (UDHR), Article 14 ensures the entitlement to dignity and brotherhood, Article 25 forbids discrimination and guarantees freedom, Article 5 prohibits cruel or degrading treatment or torture, Article 3 guarantees the right to life, and Article 7 establishes equality before the law, non-discrimination, and protection against the encouragement of discrimination.

Since India has both signed and ratified the Universal Declaration of Human Rights (UDHR), it is compelled to conform to the human rights principles specified in the document. This premise was confirmed in the Chandrima Das case. There was a debate on whether Part III of the Constitution includes the basic rights stated in the UDHR and should be protected appropriately.

Nevertheless, despite these responsibilities, occurrences of mob lynching, such as the Palghar case, persistently increase in India, with each occurrence becoming more concerning than the previous one.

5.2. The International Covenant on Civil and Political Rights (ICCPR) and The Convention on the Elimination of All Forms of Discrimination against Women(CEWAD):

As per the International Covenant on Civil and Political Rights (ICCPR), Article 20(2) explicitly forbids the promotion of hate based on nationality, race, or religion, with the intention of inciting discrimination or violence. Article 7 safeguards persons against torture and cruel treatment, but Article 18 defends the right to freedom of religion. Furthermore, Article 18 provides an assurance of liberty in matters of conscience and religious faith, Article 14 assures uniformity in legal treatment, and Article 26 ensures equal safeguarding under the law. Moreover, Article 27 guarantees the entitlement to culture, religious observance, and language.

When analysing the instance of lynching perpetrated by those who claim to be cow vigilantes, the State can be held accountable, as 24 out of 29 states have laws pertaining to cow protection. The prohibition of cow slaughter and export, as stipulated by these statutes, is in direct contradiction to the secular principles espoused by the Constitution. Their actions contravene the provisions outlined in Articles 2 and 27 of the ICCPR. Furthermore, policies such as the “love jihad” legislation in Uttar Pradesh, which have resulted in instances of lynching, also contravene Article 26 of the ICCPR. These laws demonstrate a biased perspective towards women, assuming that women are incapable of making decisions for themselves and require safeguarding.

This supports MacKinnon's assertion that the legal system inevitably demonstrates paternalism and cannot be trusted to effectively promote gender equality. This form of romantic paternalism contradicts women's fundamental entitlement to equal treatment as human beings. In addition, honour murders are considered a form of gender-based discrimination against women according to Article 1 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and they also violate Articles 6, 14, and 26 of the International Covenant on Civil and Political Rights (ICCPR).

²⁴ 2011 (6) SCC 405.

5.3. The International Covenant on Economic, Social and Cultural Rights (ICESCR) and UNGA:

Article 27 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) explicitly forbids the act of provoking religious sentiments, engaging in discriminatory practices, and perpetrating acts of violence based on religious grounds. Article 6 of the document acknowledges the entitlement to employment, guaranteeing that all individuals have the chance to generate income via labour that is voluntary or agreed upon, with governments being required to safeguard this entitlement.

The UN Committee of Economic, Social and Cultural Rights provides more details on this matter, asserting that nations have a duty to abstain from passing laws or engaging in acts that may lead to discrimination and uneven treatment of minority groups, as part of their fundamental responsibilities. The UNGA, in the 1980s, announced the Declaration on the Elimination of All Forms of Intolerance and Discrimination Based on Religion or Belief. This declaration offers member nations principles to eliminate religious intolerance.

The Haryana dairy farmer's case, along with several instances of mob lynching motivated by cow vigilantism, blatantly violates this international norm.

The Citizenship Amendment Act (CAA) and the provocative rhetoric by the home minister, which included cries like “deshkegaddaronko, golimaarosaalonko” (kill the traitors of the country), led to instances of lynching in Delhi, serving as another clear illustration of this phenomena.

In addition, the United States Commission on International Religious Freedom (USCIRF) released a statement denouncing the act of lynching Ansari, an individual belonging to the Muslim faith. The statement called for the Indian Government to implement steps to proactively avoid similar acts of violence in the future and stressed the need of ensuring that those responsible for such violent acts are held liable.

Furthermore, India was classified as a Tier 2 country because of the rising number of religious hate crimes, making it eligible for the “countries of particular concern” criteria under the International Freedom Act.

5.4. The United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCAT):

Mob lynching is also a violation of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Instances like the well publicised Palghar episode often qualify as “torture” under the definition provided in Article 1 of the Convention. This section precisely delineates torture as the deliberate act of causing intense agony or distress for a particular objective, with the authorization or passive acceptance of a government representative. Moreover, according to Article 16 of the Convention, nations are required to ban activities that may not amount to torture but are carried out with the permission or agreement of public authorities. However, while being a signatory to this agreement, India has not yet ratified it. Consequently, victims are unable to seek redress through the international legal system for abuses committed under this treaty.

VI. RECOMMENDATIONS

Propose the addition of new provisions in the Indian Penal Code (IPC) that particularly target mob lynching, such as the inclusion of offences like Attempt to Commit Mob Lynching, Causing Death by Mob Lynching, and Punishment for Mob Lynching.

Enforce more stringent controls for social media sites to curb the spread of false information and offensive language.

Implement extensive law that addresses all types of hate crimes.

Foster education and consciousness at the grassroots level through official educational programmes as well as informal efforts such as “Not in My Name” and government initiatives like 'Ek Bharat Shresht Bharat'.

VII. CONCLUSION

This article thoroughly examined many cases of mob lynching in India, uncovering underlying causes based on religious, caste, and gender prejudices. In addition, it thoroughly examined the current Indian legislation and legal precedents to evaluate India's adherence to its own legal system. Furthermore, it extensively examined International Humanitarian Laws and the instances where India failed to comply with global benchmarks, highlighting its deficiencies.

Regarding India's commitment to its international duties, the research indicates that although there is some formal compliance, it is not adequate. India has yet to make significant progress in completely eliminating mob lynching. Eleanor Roosevelt eloquently expressed that while the law may not be able to compel someone to love her, it does have the power to prevent them from committing the heinous act of lynching, which she considers to be of utmost significance. This quotation emphasises the crucial function of legal frameworks in avoiding acts of violence such as mob lynching, emphasising the need of strong and efficient legal procedures in guaranteeing the protection and security of all citizens.

BIBLIOGRAPHY

- [1]. The Indian Penal Code, 1860
- [2]. Bhartiya Nyaya Sanhita, 2023.
- [3]. The Code of Criminal Procedure, 1973
- [4]. William Hyde and Howard L. Conrad (eds.), Encyclopedia of the History of St. Louis: A Compendium of History and Biography for Ready Reference: Volume 4. New York: Southern History Company, 1899; pg. 1913.
- [5]. Brown, Jacqueline Nassy (2005). Dropping Anchor, Setting Sail: Geographies of Race in Black Liverpool. Princeton University Press, pp. 21, 23, 144.
- [6]. <https://www.jagranjosh.com/current-affairs/rajasthan-assembly-passes-antimob-lynchingbill-convicts-to-get-life-imprisonment-1565175378-1>
- [7]. <https://www.businesstoday.in/current/economy-politics/west-bengal-assembly-passesbill-against-mob-assault-lynching/story/376542.html>
- [8]. "Lynchings and the law", www.indialegallive.com
- [9]. <https://en.wikipedia.org/wiki/>
- [10]. Indian_WhatsApp_lynchings
- [11]. <https://www.manupatrafast.com/>
- [12]. <https://www.jstor.org/>
- [13]. <https://indiankanoon.org/doc/71965246/>
- [14]. <https://www.lawteacher.net/>
- [15]. <https://blog.ipleaders.in/lynching-laws-in-india/>
- [16]. <https://timesofindia.indiatimes.com/india/mob-lynching-draft-new-legislation-to-stop-people-taking-law-into-own-hands-says-sc-to-parliament/articleshow/65019261.cms>
- [17]. <https://indianexpress.com/article/opinion/columns/supreme-court-on-mob-lynching-law-against-lynching-case-social-media-whatsapp-rumours-5265173/>
- [18]. <https://www.hindustantimes.com/india-news/to-end-mob-lynching-supreme-court-gives-an-11-point-prescription/story-pdknXkMYd3Caz3R27nSnIP.html>