

Balancing Dignity and Dissent: A Comparative Study of Digital Content Regulation and Free Speech in India and Liberia

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ABSTRACT

In the contemporary digital era, where speech has become an essential mechanism for critiquing government actions and policies, free speech is increasingly viewed by political leaders as a direct threat rather than a democratic cornerstone. Despite the established fact that the right to hold and express opinions forms the foundation of an accountable, prosperous, and stable society, attempts to curb this right are escalating. Such restrictions aim to undermine the bedrock of transparent, free societies, reducing the ability of citizens to demand accountability in public service delivery. Holding and expressing personal views is not merely an individual right; it is a checkmate mechanism that forces administrative authorities to act in the best interests of the people.

This study explores cross-jurisdictional methods concerning how state authorities in India and Liberia navigate the protection of this fundamental bedrock of democracy, particularly in the face of political pressure. It provides a comparative analysis of how courts in both nations have proactively or responsively addressed political attempts to curb free speech through legislative, regulatory, and criminal means. Specifically, it examines the use of "reasonable restrictions" under Indian constitutional jurisprudence versus legal reforms, such as the repeal of criminal libel in Liberia. The study assesses the "chilling effect" of digital regulations, such as India's IT Rules and cybersecurity laws, against the backdrop of post-conflict press freedom challenges in Liberia.

Ultimately, the research indicates that there is an increasing, politically motivated attempt to curb the fundamental right to free speech, often masked as upholding national security or public order. By examining landmark judicial interventions, such as the Indian Supreme Court's focus on proportionality and Liberia's efforts to protect media, the study suggests that a strong, independent judiciary is essential to safeguard democratic space. It concludes that maintaining a vibrant marketplace of ideas requires precise, narrow legal definitions of restrictions to prevent the abuse of state power.

Keywords- Right to Hold and Express Opinion, Dignity and Dissent, Political Motives, Digital Control and Regulation

INTRODUCTION

Free speech in India and Liberia is a fundamental, constitutionally guaranteed right focusing on liberty of thought, expression, and the press, enabling citizens to express views via speech, writing, or media. While both nations uphold this right as a cornerstone of democracy, they permit legal restrictions based on public order, security, and defamation. India emphasizes "reasonable restrictions" under Article 19(2)¹, whereas Liberia's 1986 Constitution² focuses on public safety and moral constraints. In India, free speech is a fundamental right under Article 19(1)(a)³ of the Constitution, which guarantees all citizens the right to freedom of speech, expression, and the press. This right covers verbal communication, writing, pictures, movies, and digital media. The Supreme Court has expansively interpreted this to include the right to receive information. However, this

¹ Indian Const. art. 19 (cl. 2)

² Liberia Const. (1986)

³ Indian Const. Ar. 19, cl 1(a).

right is not absolute. Under Article 19(2), the State can impose "reasonable restrictions" on grounds of sovereignty and integrity, state security, friendly relations with foreign states, public order, decency, morality, and contempt of court. Free speech in India also includes the right to express dissent, which is vital for a functioning democracy, although this is frequently balanced against national security concerns⁴.

Similarly, Article 15⁵ of the Liberian Constitution guarantees the right to freely express, publish, and disseminate opinions. It protects the freedom of speech, expression, and the press, ensuring citizens can communicate without fear of censorship. Like India, this right is not absolute and is accompanied by responsibility, allowing for legal restrictions to protect public safety, health, and morality. A notable development in Liberia is the 2019 Kamara Abdullah Kamara Act⁶, which significantly improved the freedom of the press by repealing criminal libel laws, bringing the country closer to international standards. Despite this, challenges remain, such as economic pressure through civil defamation suits.

Both countries have robust frameworks for protecting free speech, emphasizing that the right is essential for democratic accountability. While India utilizes a specific, detailed list of reasonable restrictions, Liberia focuses on a more general responsibility for abuse of the right. Both nations face modern challenges regarding the restriction of free speech, such as the use of digital surveillance or civil lawsuits to silence dissent. Both Indian and Liberian courts play a critical role in upholding this right against state overreach while defining the limits of expression. Despite constitutional guarantees, both India and India-style democracies and transitional states like Liberia face the "weaponization" of legal limitations to stifle political dissent. The primary challenge lies in the elasticity of terms like "public order," "national security," and "defamation," which are often interpreted broadly by the state to target critics, journalists, and activists. In many jurisdictions, Sedition laws and anti-terror legislation are frequently used to categorize political disagreement as a threat to the state's sovereignty. In India, for instance, Section 124A of the Penal Code⁷ (though recently under judicial stay) and the Unlawful Activities (Prevention) Act (UAPA)⁸ have been criticized for being used against peaceful protesters and students. The challenge here is the "chilling effect": even if a defendant is eventually acquitted, the prolonged legal battle and pre-trial detention serve as a warning to others, effectively silencing public discourse.

Similarly, in Liberia, while the 2019 decriminalization of libel was a milestone, political figures still use civil defamation lawsuits with exorbitant damage claims to bankrupt independent media outlets. This "lawfare" shifts the battle from the streets to the courtroom, where the financial and psychological cost of defense acts as a form of indirect censorship.

Furthermore, the rise of digital authoritarianism has introduced new hurdles. Governments increasingly use "decency" and "morality" clauses to justify internet shutdowns or the removal of social media content that exposes administrative failures. These actions are often framed as protecting the public from "misinformation," but they frequently target verified reporting that is simply inconvenient for those in power. The fundamental struggle remains the lack of an independent oversight mechanism to ensure that "reasonable restrictions" do not become tools for political survival. When the state becomes both the arbiter and the enforcer of what constitutes "harmful speech," the line between protecting the nation and protecting the government becomes dangerously thin.

RESEARCH QUESTIONS

This study analyzes the provided texts to address the following queries:

1. How do the constitutional and statutory frameworks of India and Liberia actively safeguard the right to free speech?

⁴ BYJUS: IAS Preparations, Freedom of Speech, Article 19(1a), Last visited April 2, 2026

<https://byjus.com/free-ias-prep/freedom-of-speech/>

⁵ Liberia Const. art 15. (1986)

⁶ Kamara Abdullah Kamara Act of Press Freedom of 2019, Ch. 11, sect. 11.11-11.14 (Liberia)

⁷ Indian Penal Code, (No. 45 of 1860) Sect. 124A.

⁸ Unlawful Activities (Prevention) Act, 1967 (Act No. 37 of 1967) Acts of Parliament (India)

2. What is the specific role of the courts in ensuring that legal restrictions are reasonable, non-arbitrary, and not weaponized for political motives?
3. To what extent do national security and anti-terror legislations (such as India's UAPA or Liberia's public safety clauses) create a "chilling effect" on legitimate political dissent?
4. How are both nations adapting their legal protections to address modern challenges like internet shutdowns, social media regulation, and digital surveillance?
5. How does the shift from criminal penalties (like sedition) to civil liabilities (like defamation) in Liberia compare to the ongoing legal debates regarding speech-related offences in India?

RESEARCH METHODOLOGIES

This doctrinal study employs a comparative research method, utilizing both primary and secondary sources to provide a comprehensive analysis of free speech frameworks.

The primary sources consist of foundational legal authorities, including the 1950 Constitution of India and the 1986 Constitution of Liberia. The study also draws on international human rights conventions, statutory enactments, and landmark judicial precedents that define the current legal landscape. These sources serve as the direct evidence for how both nations codify and limit expression. Complementing this, secondary sources, such as peer-reviewed journals, legal commentaries, and authoritative digital reports, are used to synthesize complex legal theories into a simplified discourse. These materials provide essential context regarding the sociopolitical impact of free speech limitations and the practical challenges of political dissent. By integrating these diverse sources, the research ensures a balanced perspective that contrasts formal black-letter law with the evolving reality of judicial interpretation in both jurisdictions.

LITERATURE REVIEW

The scholarship on free speech generally begins with the "marketplace of ideas" theory, which both India and Liberia have codified. In India, Article 19(1)(a) is viewed by jurists like H.M. Seervai as the lifeblood of democracy. Similarly, the 1986 Constitution of Liberia, under Article 15, establishes that freedom of expression is an "inalienable" right, essential for a society emerging from civil conflict.

However, the literature highlights a divergence in how these rights are limited. India's Article 19(2) provides a specific list of "reasonable restrictions," whereas Liberia's limitations are often framed around "public safety" and "morality". While India's framework is more structurally rigid, Liberia's language allows for broader executive discretion, necessitating stronger judicial oversight. The role of the courts in expanding the definition of speech is a central theme in legal literature. In India, the Supreme Court has consistently moved toward a "liberal interpretation." In *Bennett Coleman & Co. v. Union of India (1972)*⁹, the Court established that the freedom of the press is an integral part of Article 19(1)(a). This was further expanded in *Maneka Gandhi v. Union of India (1978)*¹⁰, where the Court ruled that freedom of speech has no geographical limitation, and any restriction must pass the test of "reasonableness".

In Liberia, judicial interpretations have focused on protecting the press from arbitrary closure, the Supreme Court, in *Press Union of Liberia v Republic of Liberia*¹¹, affirmed that the state cannot shut down media houses without due process. These rulings are seen as a direct response to the country's history of media suppression during the civil war eras.

⁹ Bennett Coleman and Co. and Ors. Vs Union of India and Ors, 1972 (1973) AIR 106

¹⁰ Maneka Gandhi vs. Union of India, 1978 AIR 597

¹¹ Press Union of Liberia and Ors v. The Republic of Liberia, ECW/CCJ/JUD/38/22, (ECOWAS Ct. J. 2022)

In India, the use of Sedition (Section 124A IPC)¹² and the UAPA has been a point of intense scholarly debate. The landmark ruling in *S.G. Vombatkere v. Union of India* (2022)¹³, which effectively stayed the operation of the sedition law, is cited as a major victory for free speech.

The "proportionality test" has emerged as the primary tool for the Indian judiciary to check state overreach. As established in *K.S. Puttaswamy v. Union of India* (2017)¹⁴, any state interference with a fundamental right must have a legitimate goal and must be the "least restrictive" measure possible. In Liberia, the shift from criminal to civil liability is the dominant narrative. The Kamara Abdullai Kamara (KAK) Act of 2019 is hailed in international literature as a gold standard for West Africa. By decriminalizing libel and sedition, Liberia moved away from the "imprisonment of journalists" toward a system of civil damages. However, scholars warn of "strategic lawsuits against public participation" (SLAPPs), where exorbitant civil fines are used to achieve the same silencing effect as criminal charges.

The Indian Supreme Court's decision in *Shreya Singhal v. Union of India* (2015)¹⁵, which struck down Section 66A of the IT Act¹⁶ for being "vague" and "overbroad," remains a cornerstone for digital rights. Conversely, in Liberia, the discourse is currently focused on the Online Abuse Bill, with critics arguing it may re-introduce censorship through the backdoor of "decency" and "misinformation". Both India and Liberia have strong constitutional protections, the "political misuse" of limitations remains a persistent threat. The Indian judiciary relies on the "Reasonableness" and "Proportionality" tests, while the Liberian legal system emphasizes "Decriminalization" and "Individual Responsibility." Both nations demonstrate that the protection of free speech is not a static achievement but a continuous judicial battle against executive encroachment.

Public Health, Safety and Morality: Ambiguities and Misuse

In India, Article 19(2) permits restrictions based on "decency or morality," but these terms lack a statutory definition, allowing the state to equate political or social non-conformity with moral decay. For instance, in *Hemant Malviya v. State of Madhya Pradesh* (2025)¹⁷, the Supreme Court addressed the arrest of an individual for a satirical cartoon, where the state argued the post violated public decency. Similarly, in Liberia, the 1986 Constitution allows for limitations on "morality," which has historically been used to target the LGBTQ+ community and activists challenging traditional power structures.

In India, the colonial-era Epidemic Diseases Act¹⁸ and the National Disaster Management Act¹⁹ were used to issue executive decrees that bypassed legislative scrutiny. In *Javed Ahmed Hazam v. State of Maharashtra* (2024)²⁰, the Supreme Court quashed a criminal case against a professor, warning that "public order" and "safety" cannot be used to criminalize the "expression of protest and pain." In Liberia, despite the decriminalization of libel, the state often invokes "public safety" to justify the arbitrary closure of media outlets or to restrict assemblies during sensitive election cycles. A 2026 UN report noted that while strategic engagement has improved, the threat of invoking "safety" to halt protests remains a tool for political survival²¹.

National Security and Misuse and Ambiguity

National security and anti-terror legislations, such as India's Unlawful Activities (Prevention) Act (UAPA), often create a significant chilling effect on legitimate political dissent by employing broad definitions of

¹² Indian Penal Code, 1860, Sect. 124A, (No. 45 of 1860) Acts of Parliament (India)

¹³ *S.G. Vombatkere v. Union of India* (2022) 7 SCC 433 (India)

¹⁴ *Justice K.S. Puttaswamy (Retd) v. Union of India*, (2017) 10 SCC 1

¹⁵ *Shreya Singhal v. Union of India* 2015 AIR 2015 Supreme Court 1523

¹⁶ Information Technology Act, 2000, Sect. 66A (Act No. 21 of 2000) Parliament of India)

¹⁷ *Hemant Malviya vs. The State of M.P.* 2025

¹⁸ Epidemic Diseases Act, 1897, (Act No. 3 of 1897) Parliament of India

¹⁹ Disaster Management Act, (Act No. 53 of 2005) Parliament of India

²⁰ *Javed Ahmed Hazam v. State of Maharashtra*, (2024) 3 S.C.R. 317 (India)

²¹ Middle East War: UN's Turk decries Severe Restrictions on Free Speech: UN News, April 1, 2026; Last Visited April, 2, 2026

<https://news.un.org/en/story/2026/04/1167234#:~:text=the%20government%20reports,-.Middle%20East%20war:%20UN's%20T%C3%BCrk%20decries%20severe%20restrictions'%20on,according%20to%20the%20Qatari%20authorities.>

terrorism, reversing the burden of proof, and permitting prolonged detention. These laws turn legally protected speech into dangerous acts, coercing activists, media, and citizens into silence to avoid prosecution, thereby shrinking civic spaces under the guise of security. Anti-terror laws often intentionally target political dissenters, journalists, and human rights defenders rather than merely combating terrorism. Their chilling effect operates through several mechanisms including, ambiguity and overbreadth wherein laws often feature expansive definitions of "unlawful acts" or "terrorist acts" that can be applied to peaceful protests, academic debate, or opposition reporting.

Provisions regarding stringent bail conditions (e.g., Section 43D (5) of UAPA²²) make it notoriously difficult for individuals to secure release, often keeping them imprisoned for years before a trial begins, serving as a punitive measure rather than a necessary detention.

The judicial systems often grapple with balancing state power and civil liberties. In the 2021 case of *Union of India v. K.A. Najeeb* (2021)²³. The Supreme Court affirmed that constitutional courts could grant bail to UAPA detainees if the trial was unduly delayed, despite strict statutory bail restrictions, highlighting the limit of legislative restrictions on fundamental rights. Additionally, in *Shreya Singhal v. Union of India* (2015) while dealing with Section 66A of the IT Act, the Supreme Court's ruling established the foundation against "vagueness" in statutes that could "chill" free speech, a principle relevant to broad security laws. Legislation like the UAPA, when misused, creates a hostile atmosphere where the fear of being labeled a terrorist discourages activists and citizens from exercising their democratic right to dissent. These laws transform the legal framework from a tool of protection into an instrument of state coercion.

Legal Protection Addressing Social Media Regulations, Internet Shutdown, and Digital Surveillance in Liberia and India

Both India and Liberia are navigating a transformative period in digital governance, though their methods reflect different stages of technological integration and legislative maturity. As of 2024–2026, both nations are adapting their legal protections to address the shifting landscape of internet shutdowns, social media regulation, and digital surveillance through new statutes and judicial interventions. India remains a global leader in the frequency of internet shutdowns, often citing "public emergency" or "public safety." In response, the Indian judiciary has moved to install procedural safeguards. Following the landmark *Anuradha Bhasin* (2020)²⁴ ruling, the government notified the Temporary Suspension of Telecommunication Services Rules, 2024²⁵, which aimed to formalize the review process²⁶. However, critics argue these reforms lack "teeth," as review committees remain composed of bureaucrats rather than independent judicial members.

In Liberia, the challenge is often more about preventing executive overreach. While Liberia does not have the same volume of shutdowns as India, the Press Union of Liberia has successfully used the courts to challenge arbitrary closures of media outlets. The Liberian legal strategy relies heavily on the 2019 KAK Act, which established that any restriction on communication must be based on a court order, rather than a unilateral executive decree.

India has aggressively updated its Information Technology (IT) Rules in 2025 and 2026 to tackle modern harms like deepfakes and misinformation. The 2026 IT Amendment Rules²⁷ dramatically compressed the timeline for platforms to comply with government takedown orders from 36 hours to just 3 hours for specific unlawful content. The government established a Fact Check Unit (FCU) with the power to label online content as "fake"

²² Unlawful Activities (Prevention) Amendment Act, 2008 Sect 43D (5)

²³ *Union of India v. K.A. Najeeb*, (2021) 3 SCC 713

²⁴ *Anuradha Bhasin v. Union of India*, (2020) 3 SCC 637 (India)

²⁵ Telecommunications (Temporary Suspension of services) Rules, 2024, Gazette of India, pt. II Sec 3(i), No. 665 (Nov. 22, 2024) (India)

²⁶ India's Internet Shutdowns trends: reports Calls for Empirical evidence and alternative measures: ET LegalWorld, Feb. 26, 2025 <https://legal.economictimes.indiatimes.com/news/law-policy/indias-internet-shutdown-trends-report-calls-for-empirical-evidence-and-alternative-measures/118584993#:~:text=Highlights,to%20fully%20address%20core%20concerns.>

²⁷ Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules, 2026, G.S.R. 120 (E) (Feb. 10, 2026) India

or "misleading," though this has faced significant legal challenges for potentially making the state the "sole arbiter of truth."

Liberia's approach is more focused on decriminalization. By abolishing criminal libel, Liberia has moved social media disputes into the civil court system. However, the proposed Online Abuse Bill has raised concerns that "decency" clauses could be used to re-introduce censorship for social media users.

Sedition And Defamation in India and Liberia Context

Liberia's transition is defined by the Kamara Abdullai Kamara (KAK) Act of 2019, which fundamentally altered the country's legal landscape by repealing the criminal provisions for libel, sedition, and "criminal malevolence." This reform effectively moved reputational and political disputes from the criminal justice system, where they carried the threat of imprisonment, to the civil courts, where remedies are limited to monetary damages and public retractions.

The primary objective was to eliminate the state's ability to use "lawfare" to jail journalists and critics. However, as of March 2026, new challenges have emerged. The Press Union of Liberia (PUL) is currently resisting the proposed "Gender-Based Online Abuse and Harassment Act," which media advocates fear could re-criminalize speech under the guise of protecting citizens from online harassment. This highlights Liberia's ongoing struggle: ensuring that the "marketplace of ideas" remains free from the threat of jail while addressing modern digital harms.

In contrast, India has chosen a path of recalibration rather than full decriminalization. While the colonial-era Indian Penal Code (IPC) was replaced by the Bharatiya Nyaya Sanhita (BNS) in mid-2024, criminal defamation and sedition-like offenses remain on the books, albeit rebranded. While the term "sedition" was removed, Section 152 of the BNS²⁸ introduced a broader offense of "endangering the sovereignty, unity, and integrity of India." Critics argue this is a "proxy" for the old law, as it broadens the scope of punishable conduct and increases the minimum imprisonment to seven years.

Unlike Liberia, India maintains Criminal Defamation under Section 356 of the BNS²⁹. However, a significant judicial shift occurred in September 2025, when the Supreme Court observed that the time has come to decriminalize such offenses, noting that the fear of prosecution chills free expression³⁰. The Indian judiciary continues to grapple with balancing the right to free speech (Article 19) against the right to reputation, which it considers a facet of the right to life and personal liberty under article 21.

RECOMMENDATIONS AND CONCLUSION

To bridge the gap between constitutional ideals and the practical reality of free speech in India and Liberia, the following measures are recommended;

India should adopt a clearer statutory definition of "reasonable restrictions" under Article 19(2). Legislative amendments are needed to ensure that terms like "decency" and "morality" are not left to the subjective interpretation of executive agencies. Similarly, Liberia should establish a specialized judicial committee to review any "public safety" closures of media outlets to prevent executive overreach. The country should consider following Liberia's lead by fully decriminalizing defamation. Transitioning reputational disputes from the criminal to the civil domain, where the remedy is monetary rather than carceral, would significantly reduce the "chilling effect" on investigative journalism. In turn, Liberia must resist the "re-criminalization" of speech through new digital abuse laws, ensuring that modern harms are addressed through civil torts rather than imprisonment.

²⁸ Bharatiya Nyaya Sanhita, 2023, Sect. 152, (Act No. 45 of 2023) Acts of Parliament, 2023 (India)

²⁹ Bharatiya Nyaya Sanhita, 2023, Sect. 356, (Act No. 45 of 2023) Acts of Parliament, 2023 (India)

³⁰ Time to Reform Defamation Laws in India, Sept. 27, 2025 Indian Polity: Drishti IAS

<https://www.drishtias.com/daily-updates/daily-news-editorials/time-to-reform-defamation-laws-in-india>

Both nations require stronger judicial safeguards against internet shutdowns and digital surveillance. Courts should mandate that any suspension of digital services be the "least restrictive measure" and subject to immediate, independent review. Educational and institutional reforms are necessary to sensitize law enforcement agencies. Dissent should be officially recognized as a core component of "public order" rather than a threat to it, ensuring that peaceful protest and political critique are protected from the misuse of national security laws like India's Section 152 (BNS).

This study reveals that while India and Liberia are separated by vast geographical and historical differences, they share a common constitutional struggle: the slight balancing of individual liberty against the collective interests of the state. Both nations have enshrined the "freedom of thought and expression" as a fundamental pillar of their democratic identities, yet both face persistent challenges from the political misuse of legal limitations. In India, the transition from colonial-era laws to the Bharatiya Nyaya Sanhita (BNS) has been a double-edged sword. While it modernizes the legal code, the rebranding of sedition-like offenses suggests a continued state reliance on broad security powers. Conversely, Liberia's 2019 KAK Act stands as a progressive milestone for West Africa, demonstrating that a post-conflict nation can prioritize press freedom by removing the threat of jail for critics. However, the rise of "digital authoritarianism" and the misuse of "morality" clauses in both jurisdictions show that the battle for free speech has moved from the physical town square to the digital domain.

The role of the judiciary remains the most critical factor. As seen in recent rulings from the Supreme Courts of both nations, the courts serve as the final shield against arbitrary state action. By applying tests of proportionality and reasonableness, the judiciary ensures that the "marketplace of ideas" is not silenced by the "lawfare" of political actors. Ultimately, the survival of a vibrant democracy in both India and Liberia depends not just on the text of their constitutions, but on the continuous, vigilant protection of the right to dissent.

Recommendations

1. Time to Reform Defamation Laws in India, Sept. 27, 2025 Indian Polity: Drishti IAS <https://www.drishtias.com/daily-updates/daily-news-editorials/time-to-reform-defamation-laws-in-india>
2. Bharatiya Nyaya Sanhita, 2023, Sect. 356, (Act No. 45 of 2023) Acts of Parliament, 2023 (India)
3. Bharatiya Nyaya Sanhita, 2023, Sect. 152, (Act No. 45 of 2023) Acts of Parliament, 2023 (India)
4. Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules, 2026, G.S.R. 120 (E) (Feb. 10, 2026) India
5. India's Internet Shutdowns trends: reports Calls for Empirical evidence and alternative measures: ET LegalWorld, Feb. 26, 2025: <https://legal.economictimes.indiatimes.com/news/law-policy/indias-internet-shutdown-trends-report-calls-for-empirical-evidence-and-alternative-measures/118584993#:~:text=Highlights.to%20fully%20address%20core%20concerns.>
6. Telecommunications (Temporary Suspension of services) Rules, 2024, Gazette of India, pt. II Sec 3(i), No. 665 (Nov. 22, 2024) (India)
7. Anuradha Bhasin v. Union of India, (2020) 3 SCC 637 (India)
8. Union of India v. K.A. Najeeb, (2021) 3 SCC 713
9. Unlawful Activities (Prevention) Amendment Act, 2008 Sect 43D (5)
10. Middle East War: UN's Turk decries Severe Restrictions on Free Speech: UN News, April 1, 2026; Last Visited April, 2, 2026 <https://news.un.org/en/story/2026/04/1167234#:~:text=the%20government%20reports.-,Middle%20East%20war:%20UN's%20T%20C3%20BCrk%20decries%20severe%20restrictions'%20on,acording%20to%20the%20Qatari%20authorities.>
11. Javed Ahmed Hajam v. State of Maharashtra, (2024) 3 S.C.R. 317 (India)
12. Disaster Management Act, (Act No. 53 of 2005) Parliament of India
13. Epidemic Diseases Act, 1897, (Act No. 3 of 1897) Parliament of India
14. Hemant Malviya vs. The State of M.P. 2025
15. Information Technology Act, 2000, Sect. 66A (Act No. 21 of 2000) Parliament of India)
16. Shreya Singhal v. Union of India 2015 AIR 2015 Supreme Court 1523
17. Justice K.S. Puttaswamy (Retd) v. Union of India, (2017) 10 SCC 1