

BLOGS

# Case Brief: Charul Shukla v. State of U.P. & Others

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**Citation:** Charul Shukla v. State of U.P. & Others (2026 INSC 297)

**Date of judgment:** 25 March 2026

**Court:** Supreme Court of India

**Bench:** Justice B.V. Nagarathna and Justice Ujjal Bhuyan

**Important provisions:** Sections [498A](#), [323](#), [313](#) and [354](#) of the Indian Penal Code, 1860, [Sections 3](#) and [4](#) of the Dowry Prohibition Act, 1961, [Article 136](#) of the Constitution, principles governing quashing under [Article 226](#) and [Section 482](#) CrPC

Can merely naming a husband's relatives in a dowry complaint put them through a full criminal trial? And what happens when serious allegations in an FIR are not supported by the later investigation? These questions have been answered in [Charul Shukla v. State of U.P.](#), where a distinction has been drawn between true matrimonial cruelty and abuse of criminal process against relatives.

The Supreme Court quashed the FIR, chargesheet and criminal case against the sister-in-law and parents-in-law because the allegations were general, delayed and unsupported by sufficient material. Applying [State of Haryana v. Bhajan Lal](#), it warned against using criminal law to harass relatives merely because of their family connection. The husband was not an appellant, so the Court did not decide the allegations against him.

## Facts of the Case (Charul Shukla v. State of U.P. )

1. The complainant married Utkarsh Awasthi on 16 April 2017. The appellants were her sister-in-law, mother-in-law and father-in-law.

2. She alleged that her husband and his relatives demanded Rs. 8.5 lakh and a car as additional dowry and harassed her when the demand was not met.
3. She alleged that in July 2017, while she was pregnant, the husband and his relatives restrained and assaulted her, after which her husband kicked her stomach and she suffered a miscarriage.
4. It was further alleged that in October 2017 the father-in-law held her hand and misbehaved with her. On 12 November 2023, she claimed that her husband and his relatives attacked her, took away her jewellery and forced her to leave the marital home. An FIR was lodged on 15 November, 2023 under sections [498A](#), [323](#), [313](#) of Indian Penal Code and [sections 3](#) and [4](#) of Dowry Prohibition Act.

## **Procedural History (Charul Shukla v. State of U.P.)**

The appellants approached the Allahabad High Court seeking quashing of the FIR in the case of Charul Shukla v. State of U.P. . On 18 December 2023, the High Court refused to interfere. It found that the FIR contained specific allegations of assault, forcible termination of pregnancy and sexual misconduct and cognizable offenses were disclosed.

On 19 January 2024, the Supreme Court granted the appellants interim protection from arrest, subject to cooperation with investigation. Subsequently, the investigating officer later filed a chargesheet under Sections [323](#), [354](#) and [498A](#) IPC and [Sections 3](#) and [4](#) of the Dowry Prohibition Act, notably omitting Section [313](#) IPC. Following this, the Magistrate took the formal cognisance in Criminal Case No. 634 of 2025. The husband was not one of the appellants in this case.

## **Issues Before the Supreme Court (Charul Shukla v. State of U.P.)**

1. Whether the allegations and investigation material disclosed a prima facie case against the sister-in-law and parents-in-law.
2. Whether vague and general allegations of dowry demand and cruelty could justify continuing prosecution against each relative.
3. Whether the allegation of forced miscarriage was supported by medical or investigative material.

4. Whether the particulars were sufficient to support the allegations under [Section 354](#) IPC against the father-in-law.
5. Whether the long delay in filing of FIR coupled with absence of supporting evidence warranted quashing of the proceedings.
6. To prevent abuse of process, whether the case falls within the categories enumerated in [State of Haryana v. Bhajan Lal](#).

## Arguments of the Parties

The appellants relied on their separate residences, the sister-in-law's employment, a six-year delay in reporting, and the absence of an earlier complaint. They argued that the miscarriage allegation lacked specific dates, place and medical support. They further argued that the [Section 354](#) allegation was too vague.

On the other hand the State submitted the First Information Report (FIR) which clearly disclosed cognisable offences insisting that these allegations should be tested through a full trial. Notably, the complainant failed to appear in proceedings despite the service of legal notice.

## Judgment of the Supreme Court

The Supreme Court allowed the appeals in the case of *Charul Shukla v. State of U.P.* . It set aside the Allahabad High Court's order and quashed the FIR, chargesheet and criminal case against the sister-in-law and parents-in-law. It clarified that the observations would not affect any other matrimonial or related proceedings between the parties.

### 1. Allegations must be examined accused by accused

The Court first stressed that the husband was not before it. Therefore, the allegations had to be examined only from the standpoint of the sister-in-law and parents-in-law. Criminal liability cannot be assumed merely because a person belongs to the husband's family.

On the dowry allegations, the Court found no material supporting the claim that these appellants had repeatedly demanded Rs. 8.5 lakh and a car. A general statement that relatives frequently demanded dowry and harassed the complainant was not sufficient in the circumstances of the case. The Court relied on *Dara Lakshmi Narayana v. State of Telangana*, where it warned against allowing vague allegations against family members to "jump-start" the criminal process.

A relative may still be prosecuted where specific facts show what that person did and how the conduct satisfies the offence. The problem here was the absence of such material.

## **2. Delay and lack of support material**

The Court observed that there was a gap of more than six years and seven months between the marriage and FIR. It was not clear what threat or restraint was involved in the explanation that the father-in-law was a reputed advocate. It was observed that delay is not per se fatal, but a long and unexplained delay coupled with absent supporting material can seriously weaken a prosecution, in support of which it cited [\*State of Punjab v. Sarwan Singh\*](#).

## **3. The miscarriage allegation was not supported by the investigation**

The FIR invoked [Section 313](#) IPC, which concerns causing miscarriage without the woman's consent. But the investigating officer dropped this charge while filing the chargesheet. The medical examination report also did not identify an injury or other material supporting the allegation of forced miscarriage.

The Court held that these facts created serious loopholes in the prosecution story. The High Court had focused on the allegations in the FIR but had not sufficiently considered that the completed investigation did not support the serious charge originally invoked.

## **4. The Section 354 allegation lacked particulars**

The father-in-law alone faced the [Section 354](#) IPC allegation. The complainant stated that he held her hand and behaved inappropriately, but the FIR and chargesheet did not explain the alleged "obscene acts" or provide substantive material showing an intention to outrage her modesty.

The Court held that the ingredients of [Section 354](#) must be tested against the actual conduct alleged. A bare claim of inappropriate behaviour, without sufficient particulars or supporting material, was inadequate. It also noted the complainant's non-appearance despite notice.

## **Ratio Decidendi**

Criminal proceedings against relatives in a matrimonial dispute may be quashed when the allegations are vague and omnibus, they do not show the specific role of each accused, they lack supporting material and are accompanied by an unexplained and substantial delay. The

seriousness of the words used in an FIR cannot replace the basic requirement of material showing a prima facie offence.

The decision also confirms that quashing can remain possible after investigation and filing of a chargesheet. The court must examine the entire record to determine if the investigation itself corroborates or refutes the original charges.

## **Why it is Important for CLAT PG Students**

The case of Charul Shukla v. State of U.P. is important for issues of criminal procedure and matrimonial offense. It explains the difference between a prima facie allegation and a legally sustainable prosecution. It also shows how the [Bhajan Lal](#) categories operate in practice.

The case does not mean that complaints against in-laws are false or that delay always defeats prosecution. The result rested on the combination of vague allegations, unexplained delay, the dropped [Section 313](#) charge, absent medical support and insufficient particulars under [Section 354](#).

The important point is that criminal proceedings must be assessed against the ingredients of the specific offence and the role of each accused. Family relationships alone cannot supply missing evidence.