



CRIMINAL

Delhi High Court Quashes FIR in Live-In Relationship Dispute, Imposes Cost for Casual Use of Criminal Law

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PUBLISHED 17 July 2025

Introduction

In a significant ruling balancing the principles of justice with the misuse of criminal proceedings, the Delhi High Court on 15 July 2025 quashed an FIR registered under Sections 69 and 351(2) of the Bharatiya Nyaya Sanhita, 2023. The case involved allegations arising from a long-term live-in relationship that eventually soured, leading to serious [criminal charges](#) against the petitioner.

Background

Anil Verma (Petitioner) and Respondent No.2 had been in a close relationship for 15 years and were residing together in a live-in relationship since January 2019. The Petitioner was married and had promised Respondent No.2 for marriage upon divorce with his legally wedded wife, which never materialized. The petitioner was scheduled to file the second motion for divorce in May 2025.

Prior to this incident, there had been certain misunderstandings between the parties due to which the Respondent No. 2 lodged an FIR bearing no. 154/2025, registered at Police Station Prashant Vihar, Delhi for the commission of offence punishable under Section 69/351(2) of BNS.

Subsequently, the parties reached an amicable settlement. The complainant, present in court, admitted the complaint was filed during a period of emotional and medical distress and no longer wished to pursue the matter. She also acknowledged their cohabitation and that the locality knew them as a couple.

State’s Opposition

The State, represented by the Additional Public Prosecutor, opposed the quashing. It argued that allowing compromise in such cases, especially those involving allegations of sexual exploitation, sets a concerning precedent and weakens the criminal justice system’s safeguards for women

Court’s Observation

Justice Swarana Kanta Sharma took a nuanced view. While acknowledging the seriousness of the charges and cautioning against filing such complaints casually, the Court also recognised the complainant's autonomy and the genuine personal nature of the dispute.

The Court stressed that forcing trial in a case where both parties have reconciled and the complainant has expressly withdrawn her allegations would be counterproductive and an abuse of legal process.

However, the judge also noted that activating the criminal machinery based on a misunderstanding, especially in such grave matters, cannot be taken lightly. To discourage misuse of criminal law, the Court imposed a cost of ₹20,000 on the complainant, payable to the Delhi High Court Legal Services Committee.

Statutory Framework

Provision	Key Principle
Section 69, Bharatiya Nyaya Sanhita, 2023	Covers assault or use of criminal force on a woman with intent to outrage her modesty. Punishment: Up to 3 years' imprisonment and fine.
Section 351(2), Bharatiya Nyaya Sanhita, 2023	Deals with cheating by false promise of marriage leading to exploitation.

Verdict

The FIR No. 154/2025 and all consequential proceedings were quashed. However, the Court issued a cautionary reminder: invoking criminal law should not become a tool for [emotional use in personal relationships](#), especially when such invocation

comes with serious legal and reputational consequences.

Conclusion

This judgment highlights the judiciary's delicate role in navigating between the need to uphold justice and the importance of preventing misuse of criminal law in intimate personal disputes. While the Court showed compassion in acknowledging the complainant's circumstances and allowed the FIR to be quashed, it also reinforced a critical message that criminal proceedings are not meant to be casually triggered in the heat of personal grievances. By imposing costs, the Court sent a strong signal that the legal system must not be used as a tool of pressure or retribution in emotionally charged relationships. The ruling ultimately promotes both accountability and restraint, setting a precedent for how similar cases should be approached going forward.

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