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IN THE HIGH COURT OF MADHYA PRADESH
AT INDORE

BEFORE

HON'BLE SHRI JUSTICE PAVAN KUMAR DWIVEDI

ON THE 25th OF JUNE, 2026MISC. CRIMINAL CASE No. 26708 of 2026*RAJNI D/O GOPAL DAS BHATIA**Versus**THE STATE OF MADHYA PRADESH*

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Appearance:

Applicant by Shri Aman Malviya - Advocate.

*Respondent - State of Madhya Pradesh by Shri Hemant Sharma -
Government Advocate appearing on behalf of the Advocate General.*

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ORDER

Heard with the aid of case diary / challan papers.

This is first bail application under Section 483 of the Bhartiya Nagarik Suraksha Sanhita, 2023 = Section 439 of Code of Criminal Procedure, 1973 for enlargement of the applicant on regular bail in connection with crime No.204 of 2026 registered at Police Station Kotwali Dewas, District Dewas (MP) for offence punishable under Sections 308 (6), 111 (2), 61 (2) and 3 (5) of Bhartiya Nyaya Sanhita, 2023. The applicant is in custody since 13.04.2026 (formal arrest).

2. The applicant is a journalist associated with Tehelka Digital News and has been engaged in public interest journalism for several years. The applicant and her Media Team conducted Sting Operations exposing illegal Prenatal Sex Determination, unlawful Abortions and Female Foeticide being



carried out in various Nursing Homes and Hospitals in District Dewas (MP), in violation of the provisions of Preconception and Prenatal Diagnostic Techniques Act, 1994 and Medical Termination of Pregnancy Act, 1971.

2.1 In the backdrop of these investigations, several First Information Reports were registered against the applicant bearing Crimes Number 194, 195, 204 and 205 of 2026 at Police Station Kotwali, Dewas, District Dewas. The present application is against order passed by the learned trial Court on 13.05.2026 (Annexure A/1) in Bail Application No.506 of 2026 with respect to Crime No.204 of 2026. The case was registered against the present applicant under Section 308 (6), 111 (2), 61 (2) and 3 (5) of Bhartiya Nyaya Sanhita, 2023. The present applicant is innocent and has been falsely implicated in the present matter due to *mala fide* intentions, it amounts to abuse of criminal justice machinery and retaliatory actions initiated only after the applicant exposed a large illegal Female Foeticide Racket through investigative Journalism.

3. Learned counsel for the applicant submits that the present applicant, after conducting a Sting Operation, had provided the entire material of the operation including the Video Recording (s) to the concerned persons in her News Channel, who in turn on 06.04.2026, 07.04.2026 and 10.04.2026 sent those Videos to the Commissioner, Health Department, Madhya Pradesh, the Chairperson of National Human Rights Commission (NHRC), the Director General of Police (DGP) Madhya Pradesh and the Chief Medical & Health Officer (CM&HO), Dewas. It is only after sending the information and videos to these Officers on 07.04.2026, FIR at Crime No.204 of 2026 was



registered against the present applicant and other persons by alleging that the applicant and other persons are hatching a conspiracy tried to extort money from the complainant. He submits that in fact before the registration of FIR, the information regarding Sting Operation with complete Video was already sent to the responsible officers. Thus, there is no possibility of extorting money when the information was already sent to the Higher Officers of the State of Madhya Pradesh. He submits that in the present case the applicant is formally arrested on 13.04.2026. He submits that one of the co-accused namely Shrikant @ Bhau has already been enlarged on bail by order dated 28.04.2026 (Annexure A/8) passed in Miscellaneous Criminal Case No.19820 of 2026. He further submits that one of the co-accused has approached the Hon'ble Apex Court by filing petition for Special Leave to Appeal (Criminal) No(s).9645 of 2026 (Anuj Agrawal v. The State of Madhya Pradesh & others) in which an interim order has been passed on 26.05.2026 (Annexure A/11) whereby authorities are restrained from taking any coercive steps against the petitioner therein.

3.1 Learned counsel for the applicant further submits that the present applicant has been harassed for the reason that she acted in public interest and carried out Sting Operation against the complainant. Learned counsel also points out that the applicant has already been granted bail by this Court in Crime No.194 of 2026 vide order dated 19.06.2026 passed in Miscellaneous Criminal Case No.23201 of 2026, Crime No.195 of 2026 vide order dated 19.06.2026 passed in Miscellaneous Criminal Case No.26707 of 2026 and Crime No.205 of 2026 vide order dated 19.06.2026 passed in



Miscellaneous Criminal Case No.23200 of 2026. On these grounds, learned counsel prays that the applicant deserves to be enlarged on bail.

4. Per contra, learned counsel for the respondent / State vehemently opposes the prayer for grant of bail by submitting that the allegation against the applicant is serious in nature, as she has tried to blackmail the complainant by recording video(s). Hence it is submitted that application for grant of bail deserves to be rejected.

5. After considering the rival submissions made by the learned counsel for the parties and on perusal of the case diary, particularly taking into account the fact that on 06.04.2026 (Annexure A/2), the video of Sting Operation was already sent to the Commissioner, Health Department, Madhya Pradesh, Chairperson of NHRC, DGP of Madhya Pradesh as well as CM&HO, Dewas and on 06/07.04.2026, it was sent to CMHO, Dewas and only after that FIR was registered on 07.04.2026, this Court is inclined to allow this application and enlarge the applicant on bail.

6. Accordingly, without commenting anything on merits of the matter, the present application is **allowed**. The applicant is directed to be released on bail upon furnishing a personal bond in the sum of **Rs.1,00,000/- (rupees one lakh only)** with one solvent surety of the like amount to the satisfaction of the trial Court for his / her regular appearance before the trial Court during trial with a condition that he / she shall remain present before the Court concerned during trial and shall also abide by the conditions enumerated under Section 437 (3) Criminal Procedure Code, 1973 = Section 480 (3) of BNSS, 2023. If the applicant (s) is found to be involved in violation of any



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of the terms of this order, an application for cancellation of his/her bail may be filed before the Trial Court itself, who shall decide the same, in accordance with law.

7. This order shall be effective till the end of the trial. However, in case of bail jump and breach of any of the conditions of bail, it shall become ineffective.

Certified copy as per rules.

(PAVAN KUMAR DWIVEDI)
JUDGE

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