

SEXUAL AUTONOMY AND MARRIAGE LAWS IN INDIA

Written by **Shruti Kunisetty**

2nd Year B.A. LL.B Student, National Law School of India University, Bangalore

INTRODUCTION

Sexual intercourse is held to be the bedrock of every marriage. In theory, this means that both the spouses in the marriage have a social and legal duty towards the sexual needs of the other spouse. However, we see that more often than not, it is the woman who has to bear the brunt of this mandate. Especially in India, the governing social and legal codes seem to reinforce the denial to a woman, the right to her own person.

The reason this law fails to be a two-way street is due to the power dynamics and the relationship of domination and dependence entailing the institution of marriage. In India, for the longest time, women have been considered to be the chattel of men- their fathers before marriage and husbands after marriage. Manu believed that ‘A woman is the property of her father as a child, her husband as an adult and her son when she is an old widow.’

In this paper, the researcher shall examine the manner in which marriage laws in India restrict the sexual autonomy, especially of a woman. The larger objective of this paper is to identify the provisions in Indian Family law and their interpretation that further deny women their basic human right of sexual agency.

Denial of sexual intercourse for no specific reason has been construed as mental cruelty. Such inaction therefore has been held to be a ground for divorce under law. This provision has, however, been given a very wide interpretation. Consequently, this has opened the floodgates to men seeking divorce on absolutely frivolous grounds. In some cases, surprisingly, the courts even grant the same by ruling that sexual satisfaction is the husband’s and wife’s entitlement and duty respectively. This problem however, is only the tip of the ice-berg. The bigger problem is when marriage allows sexual intercourse to man as a matter of entitlement, the conditions of which are undefined. Laws exempting marital rape only reinforce this notion and instead of protecting women who are in a vulnerable position, further add to their vulnerability.

Thereafter, the researcher shall delve into the physical and psychological impact of forced marital sex on a woman.

The researcher thus contends that **the laws regulating the institution of marriage in India, tend to restrict and deny the right to sexual autonomy of married women.**

DENIAL OF SEXUAL INTERCOURSE AND CRUELTY

Before delving into the judicial treatment of denial of sexual intercourse, the researcher shall first deal with the reasons for such denial to take place. When law and social convention dictates that marriage must necessarily entail a sexual relationship, one would assume that the parties entering a marriage would have the right to choose their own spouse.

However, this is not the case in India. In a country where women are denied basic freedoms of education and work, sexual freedom seems to be an unreasonable claim to begin with.¹ Pre-marital sex is looked down upon in the Indian society as a taboo. While, even men are subject to this rule, it is women whose 'chastity' is mounted on a pedestal to be preserved.

Thus, in India sexual activity before, outside and sometimes even after the marriage is frowned upon. This essentially means that upon marriage the spouses give to each other a kind of sexual exclusivity.² Alongside this social norm, there exists the reality of Child Marriages and Arranged Marriages. In the case of a child marriage, generally, the families of the prospective bride and groom make the match and the children are married off without an iota of choice or discretion given to them. While the critique of these forms of marriages is beyond the scope of this paper, the point to be noted is that, in the Indian context the element of choice of spouse is more often than not, absent.³ Thus, under the current scenario, the social system does not allow people to choose spouses (especially on grounds of sexual compatibility) and the legal system necessitates them to have sexual relations with the said spouse.

Having explored the issue, the researcher shall now discuss the legal provisions that govern the sexual relations within the institution of marriage. Denial of sexual intercourse with the spouse,

¹ Giri Raj Gupta, 'Love, Arranged Marriage and the Indian Social Structure' (1976) 7(1) *Journal of Comparative Family Studies* 75, 77.

² Tulika Tripathi, 'Conceptualizing Woman's agency, Autonomy and Empowerment' (2011) 46(11) *EPW* 58, 60.

³ Gupta (n 1).

is categorized as 'Cruelty'. In common parlance 'cruelty' is a highly subjective term, however, it has been given a defined legal status under various personal laws.

In the Hindu Marriage Act, Section 13(1)(i-a) reads "*Any marriage solemnized....be dissolved by a decree of divorce on the ground that the other party has, after the solemnization of the marriage, treated the petitioner with cruelty*".⁴ Thus the Hindu Marriage Act, 1955 gives an undefined, subjective term like 'cruelty' as a ground for divorce. The Special Marriage Act 1954 has the same provision verbatim.⁵ Under the Parsi law the cruelty is seen considered a ground for both judicial separation⁶ and divorce⁷ just like HMA and SMA. However, the court has the discretion to decide which of the two should be granted based on the circumstances. Before 2001, under the Christian Law the man could obtain judicial separation on the grounds of adultery (not on the grounds of cruelty) whereas the wife could obtain judicial separation on the grounds of adultery coupled with cruelty.⁸ Lastly, Muslim law did not mention cruelty as a grounds for divorce.

In all cases, cruelty includes both physical and mental cruelty. Denial of sexual intercourse is a form of sexual cruelty read under mental cruelty.⁹ This means that denial of sexual intercourse is read into the term 'cruelty'. The problematic application of this provision with respect to denial of sexual intercourse can be divided into two- (a) extremely wide interpretation of the provision coupled with inconsistent application and (b) while denial of intercourse can be a ground taken by a man, in most cases, women barely ever used that ground. Instead they used impotency as a ground, which is dealt with under a separate provision of the statute.¹⁰

In the case of *Samar Ghosh v. Jaya Ghosh*, the court enumerated certain parameters for cruelty. One of the grounds was the "unilateral decision of refusal to have sexual intercourse for a *considerable period* without there being any physical incapacity or valid reason may amount to mental cruelty."¹¹ This is very vague since 'considerable period' is not really defined. While this statement implies that physical incapacity is a defense, impotency which is in fact a

⁴ Hindu Marriage Act 1955, s 13(1)(i-a).

⁵ Special Marriage Act 1954, s 27(d).

⁶ Parsi Marriage and Divorce Act, s 34.

⁷ Parsi Marriage and Divorce Act, s 32dd.

⁸ Divorce Act, s 10.

⁹ Kusum, *Family Law Lectures* (3rd edn, Lexis Nexis 2003) 46.

¹⁰ Hindu Marriage Act 1955, s 12(1)(a).

¹¹ *Samar Ghosh v. Jaya Ghosh*, [2007] 4 SCC 511.

physical incapacity, is actually a separate ground for divorce. This statement of the judgement however has been applied in the case of *Vidhya Viswanathan v. Kartik Balakrishnan*.¹²

In this case, the spouses were lived in London for 7 months and returned to Indian as the appellant fell ill. The husband had to return to London due to professional commitments when the wife was unwell. Later, the husband arranged for her to come to London. She accepted with some hesitation and thereafter refused to engage in sexual intercourse with him. The husband moved the court for a decree of divorce on the grounds that the wife's refusal to consummate the marriage amounted to mental cruelty. This decree was granted and upheld by the trial court and high court respectively. The fact that the woman was suffering from TB and that she was ill-treated by the husband and his mother was not seen as reasonable grounds for refusal.

The case of *Sanjana Sandip Pednekar v. Sandip Sitaram Pednekar* demonstrates the threat of a vaguely worded provision such as the one on cruelty. In this case, the couple went on a trip to Mahabaleshwar. In the course of this trip, the wife refused to have sexual intercourse with the respondent as she menstruating. Upon return, the husband filed for divorce in the trial court. The trial court granted divorce to the husband on the grounds that a wife denying sexual intercourse to the husband amounts to mental cruelty under Section 13(1)(i-a) of the Hindu Marriage Act. Upon appeal however, the High Court denied divorce saying that the charges were 'vague' and 'denial for four days of menstruating' is not a sufficient ground for divorce.¹³

This case is especially problematic for two reasons. Firstly, neither the lower family court, nor the high court stood for the agency of the woman with respect to the choice of whether or not the spouses engage in sexual intercourse. While the family court seemed to believe that a wife must give in to the sexual needs of her husband irrespective of her convenience, the high court relieved the wife of such obligation for 'those four days'. Secondly, not all people have the resources to appeal and challenge the decisions of the lower courts. The main advantage of setting up family courts is to save time and money. The purpose is lost when these courts fail to protect women.

In the case of *Kishore Manmohan Sharma v. Jyotshana*, the wife was sexually abused by her father in-law and she refused to have sex with the husband. Here, the husband demanded

¹² *Vidhya Viswanathan v. Kartik Balakrishnan*. [2014] 15 SCC 21.

¹³ *Sanjana Sandip Pednekar v. Sandip Sitaram Pednekar* [2014] 3 Mh.L.J 781 (Bom.).

divorce on the grounds of divorce on the grounds of 'cruelty'. The court went a step further and said that since the wife was mentally disturbed and would not be able to have sex with her husband due to the trauma caused to her by her father in law, she was 'impotent' in that marriage and therefore the husband was entitled to a divorce.¹⁴ This again demonstrates a kind of apathy towards women.

SEXUAL INTERCOURSE AS A CONJUGAL RIGHT

In the previous section, the researcher has explained how the courts have treated denial of sexual intercourse, especially by a woman. It is worth noting that barely any such cases have been filed by women and even if filed, it is on grounds of impotency and not cruelty.

Sexual intercourse has been considered the fundamental aspect of marriage. Marriage is not only seen as a license for sexual intercourse but sexual intercourse is seen to be the foundation of a marriage.¹⁵ In fact, courts have also observed that "sex plays an important role in marital life and cannot be separated from other factors which lend to matrimony a sense of fruition and fulfillment."¹⁶ Therefore, there is no disagreement on the fact that sexual intercourse is viewed as a conjugal right- that is a part and parcel of marriage.

In the case of *P v. K*, the wife told the husband on the day of the marriage that she wouldn't consummate the marriage before one year after marriage. Later the husband discovered of the pre-marital sexual relations of the wife and filed for a divorce. The court said that the knowledge of past sexual relations as it is disheartening for any man and that coupled with the refusal of the wife to consummate the marriage is a clear ground for divorce.¹⁷

Sexual intercourse is seen as an absolute conjugal right. This is quite problematic because this leads to women being constantly denied their sexual agency. All social, economic and political

¹⁴ *Kishore Manmohan Sharma v. Jyotshana*, [1979] SCC Bom 199.

¹⁵ Jewel Chanda, 'Marital Rape Versus Conjugal Right' LSI <
<http://www.legalservicesindia.com/article/466/Marital-Rape-versus-Conjugal-Right.html>> accessed July 24, 2018.

¹⁶ *Dr. N.G. Dastane v. S. Dastane*, [1975] 2 SCC 326.

¹⁷ *P v. K*, [1981] SCC OnLine Bom 135.

rights are deemed redundant if ultimately women don't have the right to bodily integrity and right to validate sexual conduct by way of consent.¹⁸ Sex as a conjugal right is acceptable provided sex is an expression of affection and not a forced act of violence and lack of consideration.¹⁹

Since, the right of a man to have sexual intercourse with his wife is seen to be some kind of an inalienable right, Indian jurisprudence does not qualify sexual intercourse within a marriage with the consent of the woman. It is the understanding of sexual intercourse as a conjugal right that serves as one of the defenses to justify the exception of a man raping his wife from the definition of rape in the Indian Penal Code.²⁰ This is due to two reasons- Firstly, it is considered that upon marriage the wife is the chattel of the husband and therefore he assumes complete right over her person. Secondly, sexual intercourse is used by the man to assert dominance over the wife and as a tool for punishment and control.²¹ This is why, in a recent study, it was found that women who are financially independent and employed were subject to a higher risk of marital rape and violence.²² This goes on to show that when the man cannot assert his superiority in any other way, sexual abuse serves as a sign of domination.

The idea of sex as a conjugal right can be traced back to the commentary of Sir Mathew Halle, in the 17th Century England who wrote that "the husband cannot be guilty of a rape committed by himself upon his lawful wife, for by their mutual matrimonial consent and contract, the wife hath given herself in kind unto her husband, which she cannot retract."²³ According to the National Survey, the latest statistics say that 5.4% of the married women have reported to be subject to marital rape the real figure is estimated to exceed 12-15%.²⁴

¹⁸ Rosemarie Tong, *Feminist Thought: A Comprehensive Introduction* (1989) 73.

¹⁹ Saurabh Mishra, 'Marital Rape: Myth Reality and Need for Criminalization' (2003) *The Practical Lawyer*.

²⁰ Indian Penal Code, s 375.

²¹ Pooja Chowdary, "'Marital Rape Laws Will Be Misused By Women' is a Flawed Argument' *The Logical Indian* < <https://thelogicalindian.com/awareness/marital-rape-can-be-proven/> > accessed on July 24, 2018.

²² Ackerson, L K, I. Kawachi, E M Barbeau and S V Subramanian, 'Effects of Individual and Proximate Educational Context on Intimate Partner Violence: A Population-based Study of Women in India' (2008) 98(3) *American Journal of Public Health* 507,512.

²³ Shagun Sabarwal, 'Women's Empowerment and Forced Sex within Marriage in Rural India' (2012) 47(2) *EPW* 65, 65.

²⁴ Ministry of Health and Family Welfare, *National Family Health Survey (NFHS-4)* (2015-16).

The courts have made a distinction between rape between a married and unmarried couple.²⁵ This distinction emanates from the assumption that women are bound to have sexual intercourse with their husbands by virtue of their implied consent to that effect by way of marriage.²⁶

In the case of *Bodhisattwa Gautam v. Subha Chakraborty* the court held that marital rape is permissible under the Hindu Marriage Act as it is a form of restitution of conjugal rights.²⁷ This is in fact bad law because the order of restitution of conjugal rights may only be granted by the court. Additionally, having a conjugal right does not imply that the person may use force and violence to regain it.

In a recent case the Supreme Court held that rape of a wife below the age of 18 cannot avail the exemption to section 375.²⁸ However, the court continues to hold that the rape of an adult woman by her own husband cannot be construed as rape.

Thus, the courts distinguish between rape within and outside a marriage on two grounds- firstly, rape within a marriage is seen to be a lesser wrong since the husband by virtue of being within the institution of marriage, has rights over his wife's body. It is still a 'lesser wrong' since it can be read under the Domestic Violence Act, but isn't 'wrong enough' to be criminalized. Secondly, there is a kind of implied consent to forced marital sex.²⁹ Thus law denies a woman the ability to regulate the husband's sexual access.³⁰

It is observed that, more often than not, these cases go unreported and wives submit to forced sex within the marriage due to financial and social dependence. This is not to be seen as a contradiction to the previous observation that states that economically well-placed women face higher incidence of forced sex and violence because whether economically well-off or not, the

²⁵ Anna Scheyett, 'Marriage is the Best Defense: Policy on Marital Rape' <
<http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.885.8312&rep=rep1&type=pdf>
> accessed on July 24, 2018.

²⁶ Sabarwal (n 22).

²⁷ *Bodhisattwa Gautam v. Subha Chakraborty* [1996] SCC (1) 490.

²⁸ *Independent Thought v. Union of India*, [2017] 10 SCC 800.

²⁹ Jill Elaine Hasday, 'Contest and Consent: A Legal History of Marital Rape' (2000) 88(5) California Law Review 1373.

³⁰ Ibid.

resources of the woman are also placed under the control of the man.³¹ Some radical feminists view this as ‘legalized prostitution’ wherein the woman has no autonomy or right to her own person and is compelled to put up with constant sexual abuse and abuse of her bodily integrity due to her social and economic standing. Worse still, such a treatment towards her has some legal backing.³²

This denial to a woman to have a say in her own sexual activity is a direct violation of her human rights of bodily autonomy.³³ To sum up, the following arguments in favor of marital rape demonstrate the lack of sexual autonomy of a married woman. Firstly, marriage is an implied consent given by the woman for sexual intercourse thereafter. Moreover, sexual intercourse is a conjugal right and therefore the husband cannot be treated in the same manner as a man raping a woman who isn’t his wife. Lastly, marriage in India, is contract for intercourse which eliminates the need for a man to seek permission before imposing himself on his wife.³⁴

In contemporary times, the issue of sexual intercourse as a conjugal right and marital rape are quite controversial due to the realization that such evils tend to oppress women further and consign them to a state of helplessness and fear.³⁵ The J.S. Verma committee was set up to examine this issue and recommend ways to address the same. The committee suggested that the exception to rape be removed with specific emphasis on the idea that the relationship between the individuals is no valid defense for a crime like sexual offence. Secondly, consent is to be given its due importance irrespective of the intimate relationship between the two individuals.³⁶

³¹ Elizabeth Clark, ‘Matrimonial Bonds’ (2011) <
https://www.jstor.org/stable/743675?origin=crossref&seq=1#page_scan_tab_contents > accessed on July 24, 2018.

³² M. Gangadevi, ‘Restitution of Conjugal Rights: Constitutional Perspective’ (2003) 45(3) *Journal of Indian Law Institute* 453, 454.

³⁴ Kalpana Sharma, ‘Why Isn’t Marital Rape an Offence in India?’ (2017) *TOI* <
<https://timesofindia.indiatimes.com/life-style/relationships/love-sex/Why-isnt-marital-rape-a-criminal-offence-in-India/articleshow/54223996.cms>> accessed on July 24, 2018.

³⁵ David A. Richards, *Why Love Leads to Justice: Love Across Boundaries* (2015).

³⁶ *Report on The Committee on Amendments to Criminal Law* (2013).

IMPACT ON THE WOMAN IN MARRIAGE

So far, the researcher has explained how even the slightest refusal of a woman to have sexual intercourse in the marriage could amount to cruelty which formed a ground for divorce. Worse still, since sexual intercourse is seen to be an immutable entitlement of men, the act of using force and violence to that effect is not criminalized. These principles are not purely social norms, but also have legal backing.

It must be noted, that these rights and issues being discussed do not have a uniform, gender-neutral impact. Undoubtedly, women bear the brunt of such ideologies and laws. This is simply because, women have constantly been denied to access to social facilities such as education, work opportunities, etc. which have been the monopoly of men. As a result, women are generally dependent on their spouses for financial support. Even the women who work and earn, surrender their earnings to be controlled by their husbands and in-laws. This is because they have been socialized to believe that men are responsible for all the important decisions taken in the family including finances. Thus, since women are at the mercy of their spouses, they are compelled to give in to all kinds of demands, even if that ultimately denies the woman the right to her own person. By extension, a woman, generally, cannot voice her desire for divorce on similar grounds or use force to satisfy her sexual needs as she is bound in the shackles of dependency.

The important question to address is, the impact of staying in a marriage with constant sexual abuse on the woman. One argument for treating marital rape as a lesser crime is that rape committed by one partner on another is not as agonizing and traumatizing if it is within the marital setup. This, is a highly falsified notion. It has been stated that “the only difference between a rape and a marital rape is that in the case of marital rape the victim has to serve breakfast to her rapist the next morning.” The trauma of marital rape, therefore, is only more than that of normal rape. This is because while a victim of rape suffers from having to live with the memory, the victim of marital rape has to live with the rapist and lives in the fear of recurrence.³⁷

³⁷ Scheyett (n 24).

The scope of this chapter however, is not focused on marital rape but on undesired sex and the constant need for the woman to engage in forced sexual intercourse. Research shows that women who have experienced instances of forced sex face adverse reproductive and sexual health outcomes.³⁸

Most women who live in such abusive relationships and face instances of forced sexual intercourse suffer from Post-Traumatic Stress Disorder (PTSD). This manifests itself in the form of guilt, fear and shame. As the incidence of such events increases, its effects escalate and go on to take the form of major anxiety, acute depression and sometimes even the development of suicidal tendencies.³⁹ On a purely psychological level, the woman turns submissive. The institution of marriage to her is purely oppressive and she internalizes her lack of sexual agency. Additionally, she considers sexual intercourse to be her obligation towards her husband and not an act of mutual intimacy and satisfaction.⁴⁰

This could become extremely problematic as, in effect, the governing social and legal norms are asking women to live in their marriage, a sexual relationship, without a choice of not engaging in sexual intercourse. Not only is law allowing denial of sexual intercourse to be a ground for divorce but also granting legal sanction and justification to the act of using force against the woman to coerce her into sexual intercourse.

CONCLUSION

The researcher has shown how marriage has been construed as a sexual relationship. The irony of the matter is that, it is considered that sexual intimacy is the quintessential aspect of any marriage, more often than not, the choice of getting married and the spouse is not left to the parties involved. Moreover, the spouses are expected to be sexually involved once they enter

³⁸ Shireen Jejeeboy, 'Women's Autonomy and Experience of Physical Violence Within the Marriage in Rural India' (2013) 29(2) *Journal of Interpersonal Violence* 332, 334.

³⁹ Chanda (n 15).

⁴⁰ A.S. Altekar, *The Position of Women in the Hindu Civilization* (1938).

marriage. This is problematic because lack of choice of a sexual partner entails the lack of complete free will to engage in sexual intercourse.

Non-consummation of the marriage is read under mentally cruelty covered under 'cruelty' mentioned in Section 13(1)(i-a) of the Hindu Marriage Act and also other marriage laws. Due to the wide interpretation given to the term 'cruelty', the woman no longer has the choice of refusal. Additionally, sexual intercourse is considered to be a conjugal right which is an inalienable right. This provides a justification even or marital rape. Therefore, an amendment defined cruelty is required so as to enable strict interpretation of the same.

Due to the current provisions in law, women, upon marriage are required to surrender their sexual autonomy. The researcher believes that this is unfair as it is violative of her basic human rights. Further, courts' interpretation reflect the notion that sexual intercourse is provided by women and received by men. Due to this, the man is the one determining the sexual relationship in the marriage. Therefore, the situation must be remedied by eliminating the vagueness in the law. This may be done by specifying a fixed period of time for denial of sexual intercourse to form a ground for divorce. This would ensure strict interpretation and reduce unreasonable claims. Additionally, the exception of marital rape must be scrapped off so as to protect the woman and her sexual agency within the marriage.

BIBLIOGRAPHY

BOOKS

1. A.S. Altekar, *The Position of Women in the Hindu Civilization* (1938).
2. David A. Richards, *Why Love Leads to Justice: Love Across Boundaries* (2015).
3. Kusum, *Family Law Lectures* (3rd edn, Lexis Nexis 2003) 46.
4. Rosemarie Tong, *Feminist Thought: A Comprehensive Introduction* (1989) 73.

ARTICLES

1. Ackerson, L K, I. Kawachi, E M Barbeau and S V Subramanian, 'Effects of Individual and Proximate Educational Context on Intimate Partner Violence: A

- Population-based Study of Women in India' (2008) 98(3) American Journal of Public Health 507.
2. Anna Scheyett, 'Marriage is the Best Defense: Policy on Marital Rape' < <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.885.8312&rep=rep1&type=pdf>> accessed on July 24, 2018.
 3. Elizabeth Clark, 'Matrimonial Bonds' (2011) < https://www.jstor.org/stable/743675?origin=crossref&seq=1#page_scan_tab_contents > accessed on July 24, 2018.
 4. Giri Raj Gupta, 'Love, Arranged Marriage and the Indian Social Structure' (1976) 7(1) Journal of Comparative Family Studies 75.
 5. Jewel Chanda, 'Marital Rape Versus Conjugal Right' LSI < <http://www.legalservicesindia.com/article/466/Marital-Rape-versus-Conjugal-Right.html>.> accessed July 24, 2018.
 6. Jill Elaine Hasday, 'Contest and Consent: A Legal History of Marital Rape' (2000) 88(5) California Law Review 1373.
 7. Kalpana Sharma, 'Why Isn't Marital Rape an Offence in India?' (2017) TOI < <https://timesofindia.indiatimes.com/life-style/relationships/love-sex/Why-isnt-marital-rape-a-criminal-offence-in-India/articleshow/54223996.cms>> accessed on July 24, 2018.
 8. M. Gangadevi, 'Restitution of Conjugal Rights: Constitutional Perspective' (2003) 45(3) Journal of Indian Law Institute 453.
 9. Pooja Chowdary, "'Marital Rape Laws Will Be Misused By Women" is a Flawed Argument' The Logical Indian < <https://thelogicalindian.com/awareness/marital-rape-can-be-proven/>> accessed on July 24, 2018.
 10. Saurabh Mishra, 'Marital Rape: Myth Reality and Need for Criminalization' (2003) The Practical Lawyer.
 11. Shagun Sabarwal, 'Women's Empowerment and Forced Sex within Marriage in Rural India' (2012) 47(2) EPW 65, 65.
 12. Shireen Jeeboy, 'Women's Autonomy and Experience of Physical Violence Within the Marriage in Rural India' (2013) 29(2) Journal of Interpersonal Violence 332.

13. Tulika Tripathi, 'Conceptualizing Woman's agency, Autonomy and Empowerment' (2011) 46(11) EPW 58.

REPORTS

1. Ministry of Health and Family Welfare, *National Family Health Survey (NFHS-4)* (2015-16).
2. *Report on The Committee on Amendments to Criminal Law* (2013).

