

# Constitutional Validity of Anti-Conversion Laws In India: An Analysis of Religious Freedom under Articles 25 And 26

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## ABSTRACT

The constitutional validity of anti-conversion laws in India remains one of the most debated issues in contemporary constitutional jurisprudence. These laws, enacted by several states, seek to regulate religious conversions by prohibiting conversions achieved through force, fraud, coercion, allurements, or undue influence. Proponents argue that such legislation is necessary to maintain public order and protect vulnerable individuals from exploitative conversion practices. Critics, however, contend that these laws impose unreasonable restrictions on the fundamental right to freedom of religion guaranteed under Articles 25 and 26 of the Constitution of India. The constitutional challenge primarily revolves around the extent to which the State may regulate religious conversion without infringing upon an individual's freedom of conscience and the right to profess, practice, and propagate religion.

This paper critically examines the constitutional framework governing religious freedom in India and analyzes the validity of anti-conversion laws in light of judicial precedents, particularly the Supreme Court's decision in *Rev. Stanislaus v. State of Madhya Pradesh* (1977). The study evaluates whether contemporary anti-conversion statutes strike an appropriate balance between individual autonomy and the State's responsibility to maintain public order. It further explores concerns relating to privacy, dignity, equality, and the rights of religious minorities in the context of recent legislative developments. Through a doctrinal analysis of constitutional provisions, judicial interpretations, and state enactments, the paper assesses whether anti-conversion laws align with the principles of secularism and constitutional morality. The study concludes by highlighting the need for a nuanced legal framework that safeguards genuine religious freedom while addressing concerns regarding forced or fraudulent conversions within a democratic and pluralistic society.

**Keywords:** Religious Freedom, Anti-Conversion Laws, Article 25, Article 26, Constitutional Validity

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## INTRODUCTION

Religious freedom occupies a central place in the constitutional framework of India and forms an essential component of the country's commitment to secularism, pluralism, and democratic governance. India is home to a remarkable diversity of religions, faiths, and belief systems, including Hinduism, Islam, Christianity, Sikhism, Buddhism, Jainism, and numerous indigenous traditions. The framers of the Constitution recognized the importance of protecting this diversity and

accordingly incorporated comprehensive guarantees relating to freedom of religion under Part III of the Constitution. Articles 25 and 26 constitute the cornerstone of these protections, ensuring that every individual enjoys freedom of conscience and the right freely to profess, practice, and propagate religion, while religious denominations are granted autonomy in managing their religious affairs.<sup>1</sup>

The constitutional protection of religious liberty is rooted in the broader vision of secularism adopted by India. Unlike the strict separation model followed in some Western jurisdictions, Indian secularism seeks to maintain principled state neutrality while permitting constructive engagement with religious communities. The Constitution neither establishes a state religion nor discriminates among religions, thereby creating a framework in which diverse faiths may coexist with equal dignity and protection.<sup>2</sup> The Supreme Court has repeatedly emphasized that secularism forms part of the basic structure of the Constitution and cannot be abrogated even through constitutional amendment.<sup>3</sup> Consequently, any legislative measure affecting religious freedom must be examined in light of constitutional values, fundamental rights, and the doctrine of basic structure.

Within this constitutional framework, the issue of religious conversion has emerged as one of the most contentious legal and political debates in contemporary India. Religious conversion may occur voluntarily as a manifestation of individual conscience and spiritual choice, or it may result from external influences, social pressures, or inducements. While the Constitution expressly guarantees the right to propagate religion, disagreements have arisen regarding whether this guarantee includes a corresponding right to convert another person. The debate has become particularly significant because several Indian states have enacted anti-conversion laws, commonly referred to as Freedom of Religion Acts, with the stated objective of preventing conversions achieved through force, fraud, coercion, undue influence, or allurements.<sup>4</sup>

The history of anti-conversion legislation in India predates independence and can be traced to certain princely states that attempted to regulate missionary activities and religious conversions. Following independence, the issue resurfaced in the context of concerns regarding conversions among economically and socially vulnerable communities. Although Parliament has never enacted a nationwide anti-conversion statute, several states including Odisha, Madhya Pradesh, Chhattisgarh, Gujarat, Himachal Pradesh, Uttarakhand, Uttar Pradesh, Haryana, and Karnataka have enacted laws regulating religious conversion. These statutes generally require prior notification or post-conversion declarations and prescribe criminal penalties for conversions alleged to have been induced through prohibited means.<sup>5</sup>

Supporters of anti-conversion laws argue that the State possesses a legitimate interest in protecting individuals from coercive or fraudulent religious practices. They contend that vulnerable sections of society may be susceptible to conversion through material inducements or misrepresentation and that legislative intervention is necessary to preserve public order and social harmony. From this perspective, anti-conversion laws represent a reasonable restriction on religious activities rather than an infringement of religious freedom. Advocates further argue that such legislation seeks to safeguard the autonomy of individuals by ensuring that conversions are genuinely voluntary and informed.<sup>6</sup>

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<sup>1</sup> Constitution of India, arts. 25–26.

<sup>2</sup> Constituent Assembly Debates, Vol. VII, available at: <https://eparlib.nic.in/handle/123456789/756195> (Visited on June 14, 2026).

<sup>3</sup> *S.R. Bommai v. Union of India*, (1994) 3 SCC 1.

<sup>4</sup> Law Commission of India, *Consultation Paper on Freedom of Religion and Religious Conversion*, available at: <https://lawcommissionofindia.nic.in> (Visited on June 14, 2026).

<sup>5</sup> Ministry of Home Affairs, Government of India, State Legislations on Freedom of Religion, available at: <https://www.mha.gov.in> (Visited on June 15, 2026).

<sup>6</sup> *Rev. Stanislaus v. State of Madhya Pradesh*, (1977) 1 SCC 677.

Critics, however, maintain that anti-conversion laws often extend beyond the prevention of force and fraud and operate as instruments that restrict legitimate religious expression and personal autonomy. Concerns have been raised regarding vague statutory definitions of terms such as "allurement," "inducement," and "undue influence," which may permit arbitrary enforcement and create a chilling effect on religious activities. Critics further argue that mandatory notification requirements and state scrutiny of personal religious choices infringe upon the rights to privacy, dignity, and freedom of conscience recognized under Article 21 of the Constitution.<sup>7</sup> Such concerns have intensified following the Supreme Court's recognition of privacy as a fundamental right in *Justice K.S. Puttaswamy v. Union of India*, which emphasized individual autonomy in matters of personal belief and identity.<sup>8</sup>

The constitutional debate surrounding anti-conversion laws is closely linked to judicial interpretation of Articles 25 and 26. The most significant precedent remains *Rev. Stanislaus v. State of Madhya Pradesh* (1977), in which the Supreme Court upheld the constitutional validity of anti-conversion statutes enacted by Madhya Pradesh and Odisha. The Court held that while Article 25 guarantees the right to propagate religion, it does not confer a fundamental right to convert another person. According to the Court, conversion through force, fraud, or allurement could undermine the freedom of conscience of others and potentially disturb public order.<sup>9</sup> This decision continues to serve as the principal judicial authority supporting state regulation of religious conversion.

However, constitutional jurisprudence has evolved significantly since *Rev. Stanislaus*. Subsequent judicial decisions have expanded the scope of individual autonomy, privacy, dignity, and decisional freedom in matters relating to marriage, belief, and personal identity. Cases such as *Shafin Jahan v. Asokan K.M.* and *Lata Singh v. State of Uttar Pradesh* underscore the constitutional protection afforded to personal choices concerning faith and marital relationships.<sup>10</sup> These developments have prompted renewed scholarly debate regarding whether contemporary anti-conversion laws remain consistent with evolving constitutional standards.

Another important dimension of the controversy concerns interfaith marriages and allegations of conversion for marital purposes. Several recent state enactments specifically address conversions associated with marriage and impose procedural requirements for validating such conversions. These provisions have generated extensive litigation concerning the balance between state interests and individual rights. Questions have arisen regarding whether such laws disproportionately affect religious minorities, interfere with adult consent, and undermine constitutional guarantees of equality and liberty.<sup>11</sup>

The examination of anti-conversion laws is therefore not merely a question of statutory interpretation but also a broader inquiry into the nature of religious freedom in a constitutional democracy. It raises fundamental questions concerning the relationship between the State and religion, the meaning of secularism, the limits of governmental regulation, and the protection of minority rights. As India continues to negotiate competing claims of religious liberty, social harmony, and public order, the constitutional validity of anti-conversion laws remains a subject of profound legal significance.

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<sup>7</sup> Faizan Mustafa, "Freedom of Religion and Anti-Conversion Laws in India," available at: <https://www.thehindu.com/opinion/lead/freedom-of-religion-and-anti-conversion-laws/article> (Visited on June 15, 2026).

<sup>8</sup> *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 SCC 1.

<sup>9</sup> *Rev. Stanislaus v. State of Madhya Pradesh*, (1977) 1 SCC 677.

<sup>10</sup> *Shafin Jahan v. Asokan K.M.*, (2018) 16 SCC 368; *Lata Singh v. State of Uttar Pradesh*, (2006) 5 SCC 475.

<sup>11</sup> PRS Legislative Research, "State Freedom of Religion Laws and Interfaith Marriages," available at: <https://prsindia.org> (Visited on June 16, 2026).

The present study seeks to critically analyze the constitutional validity of anti-conversion laws in India with particular reference to Articles 25 and 26 of the Constitution. It examines the historical evolution of such laws, evaluates judicial precedents, and assesses their compatibility with contemporary constitutional principles of liberty, equality, privacy, dignity, and secularism. Through a doctrinal analysis of constitutional provisions, statutory frameworks, and judicial decisions, the study aims to contribute to the ongoing discourse regarding the appropriate balance between individual religious freedom and legitimate state regulation in a pluralistic society.

### **RESEARCH OBJECTIVES**

1. To examine the constitutional validity of anti-conversion laws in India in light of the religious freedom guarantees under Articles 25 and 26 of the Constitution.
2. To analyze judicial interpretations and legislative frameworks governing religious conversion and assess their impact on individual freedom of conscience and secular constitutional values.

### **METHODOLOGY**

The present study adopts a doctrinal research methodology to examine the constitutional validity of anti-conversion laws in India and their compatibility with the religious freedom guarantees enshrined under Articles 25 and 26 of the Constitution. The research is primarily based on the analysis of secondary sources, including constitutional provisions, statutes, judicial decisions, scholarly articles, books, law commission reports, government publications, and research papers. Particular emphasis is placed on the examination of landmark judgments such as *Rev. Stanislaus v. State of Madhya Pradesh* and other relevant decisions that have shaped the jurisprudence relating to religious freedom and conversion.

The study also analyzes various state anti-conversion legislations to assess their constitutional implications. In addition, relevant international human rights instruments and comparative legal materials are consulted to provide broader contextual understanding. The collected data are analyzed using the analytical and descriptive methods to evaluate the extent to which anti-conversion laws balance the protection of public order with the preservation of individual freedom of conscience, religious liberty, and constitutional secularism in India.

### **ANALYSIS**

#### **1. Freedom of Conscience and Religious Conversion under Article 25**

The constitutional debate surrounding anti-conversion laws in India is fundamentally rooted in the interpretation of Article 25, which guarantees freedom of conscience and the right freely to profess, practice, and propagate religion. Freedom of conscience represents the inner liberty of an individual to hold, change, or reject religious beliefs according to personal conviction. Religious conversion, when undertaken voluntarily, is often regarded as a manifestation of this freedom. The Constitution does not explicitly mention a right to convert; however, the guarantee of freedom of conscience necessarily implies that an individual possesses the autonomy to choose a faith different from that into which he or she was born.<sup>12</sup>

The constitutional significance of religious choice has become increasingly important in contemporary jurisprudence, where personal autonomy and dignity are recognized as central elements of constitutional liberty. The Supreme Court has consistently emphasized that matters concerning belief, identity, and personal faith fall within the protected domain of

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<sup>12</sup> Constitution of India, art. 25.

individual freedom. Consequently, any legislative restriction on conversion must be evaluated in light of its impact on the individual's right to determine his or her religious identity.<sup>13</sup>

## 2. State Regulation of Religious Conversion and Public Order

Anti-conversion laws enacted by various Indian states are justified primarily on the ground of maintaining public order and preventing conversions achieved through force, fraud, coercion, allurement, or undue influence. The Constitution itself subjects religious freedom to considerations of public order, morality, and health. Consequently, the State possesses the authority to regulate activities that threaten social harmony or interfere with the free exercise of religion by others.<sup>14</sup>

Supporters of anti-conversion legislation argue that vulnerable sections of society may be susceptible to exploitation through material inducements or deceptive practices. In such circumstances, state intervention is viewed as a mechanism for protecting genuine freedom of conscience rather than restricting it. The rationale is that a decision to embrace a different religion must be the result of free will rather than external pressure. Thus, anti-conversion laws seek to distinguish between voluntary conversions and conversions secured through unlawful means.<sup>15</sup>

However, constitutional concerns emerge when statutory provisions extend beyond the prevention of coercion and begin regulating ordinary religious activities. The challenge lies in ensuring that the State's interest in maintaining public order does not become a justification for excessive interference with religious liberty.

## 3. Vagueness and Constitutional Concerns in Anti-Conversion Statutes

One of the most significant criticisms of anti-conversion laws relates to the broad and ambiguous terminology employed in many state enactments. Terms such as "allurement," "inducement," and "undue influence" often lack precise legal boundaries. Religious organizations frequently engage in charitable activities such as education, healthcare, and social welfare as expressions of their faith. Determining whether such activities constitute genuine humanitarian service or impermissible inducement may be difficult in practice.<sup>16</sup>

The doctrine of constitutional certainty requires laws affecting fundamental rights to be sufficiently clear and predictable. Ambiguous provisions create opportunities for arbitrary enforcement and may discourage legitimate religious activities out of fear of prosecution. Such uncertainty can produce a chilling effect on the exercise of religious freedom, particularly among minority communities whose faith traditions emphasize missionary work and religious outreach.<sup>17</sup>

From a constitutional perspective, restrictions on fundamental rights must be narrowly tailored to achieve legitimate objectives. Overbroad provisions risk undermining the very freedoms that Articles 25 and 26 were designed to protect.

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<sup>13</sup> *Navtej Singh Johar v. Union of India*, (2018) 10 SCC 1.

<sup>14</sup> Constitution of India, art. 25(1).

<sup>15</sup> *Ratilal Panachand Gandhi v. State of Bombay*, AIR 1954 SC 388.

<sup>16</sup> M.P. Jain, *Indian Constitutional Law* (9th edn., LexisNexis, New Delhi, 2023) 1348.

<sup>17</sup> Gautam Bhatia, *The Transformative Constitution* (HarperCollins, New Delhi, 2019) 216.

#### 4. Application of the Doctrine of Proportionality

Modern constitutional jurisprudence increasingly employs the doctrine of proportionality to evaluate restrictions imposed on fundamental rights. According to this principle, state action must pursue a legitimate objective through measures that are necessary, reasonable, and proportionate to the intended goal.<sup>18</sup>

In the context of anti-conversion laws, proportionality requires an assessment of whether procedural requirements such as prior notification, administrative approval, or criminal penalties are genuinely necessary to prevent unlawful conversions. While preventing fraud and coercion is undoubtedly a legitimate objective, the means adopted to achieve that objective must not impose excessive burdens upon religious freedom.

The proportionality test also requires consideration of less restrictive alternatives. If the same objective can be achieved through ordinary criminal laws addressing fraud, intimidation, or coercion, the necessity of imposing additional restrictions on religious conversion becomes a matter of constitutional scrutiny. Therefore, proportionality serves as a critical framework for determining the constitutional validity of anti-conversion legislation.

#### 5. Religious Denominational Rights under Article 26

Article 26 grants religious denominations the right to manage their own affairs in matters of religion, establish religious institutions, and administer property associated with religious purposes. These protections recognize the collective dimension of religious freedom and safeguard the autonomy of religious communities.<sup>19</sup>

Many religious traditions consider propagation and dissemination of faith to be integral components of their religious mission. Consequently, restrictions that significantly limit communication of religious beliefs may affect denominational rights protected under Article 26. While the State may regulate unlawful conversion practices, it must ensure that such regulation does not impair the legitimate activities of religious institutions.

The constitutional challenge lies in distinguishing between impermissible conversion through coercion and permissible religious persuasion. Excessive restrictions may interfere with the autonomy of religious organizations and undermine the constitutional protection afforded to denominational freedoms.

#### 6. Equality Concerns under Article 14

Anti-conversion laws must also be examined in light of Article 14, which guarantees equality before the law and equal protection of the laws. Constitutional validity depends not only upon the text of legislation but also upon its practical operation and enforcement.<sup>20</sup>

Critics argue that anti-conversion statutes may disproportionately affect certain religious communities that actively engage in missionary activities. If enforcement patterns reveal selective targeting or unequal treatment, questions regarding discrimination and arbitrariness inevitably arise. The principle of equality requires that legislation operate impartially and that state authorities apply legal provisions without religious bias.

The Supreme Court has consistently held that arbitrariness is antithetical to equality. Consequently, anti-conversion laws must be administered in a manner that ensures neutrality and prevents discriminatory outcomes.

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<sup>18</sup> *Modern Dental College and Research Centre v. State of Madhya Pradesh*, (2016) 7 SCC 353.

<sup>19</sup> Constitution of India, art. 26.

<sup>20</sup> Constitution of India, art. 14.

## 7. Interfaith Marriages, Conversion, and Individual Autonomy

Recent anti-conversion statutes have increasingly focused on conversions associated with interfaith marriages. These laws often require administrative scrutiny of religious conversions occurring before or after marriage and may impose procedural requirements on the parties involved.<sup>21</sup>

Such provisions raise important constitutional questions regarding personal autonomy and decisional freedom. Marriage and religion are among the most intimate aspects of individual identity. The freedom to choose a spouse and the freedom to choose a religion are both closely linked to personal liberty under Article 21. Judicial decisions have repeatedly affirmed that competent adults possess the right to make such decisions without interference from the State or society.<sup>22</sup>

When anti-conversion laws subject interfaith marriages to extensive scrutiny, concerns arise regarding the extent to which state intervention intrudes into private decision-making. Constitutional protections require that personal choices concerning faith and marriage receive substantial respect unless compelling public interests justify regulatory intervention.

## 8. Privacy and Procedural Requirements in Conversion Laws

Several state anti-conversion laws require individuals to notify government authorities before or after undergoing religious conversion. Supporters argue that these provisions assist in verifying voluntariness and preventing fraudulent conversions. However, opponents contend that such requirements infringe upon the constitutional right to privacy.<sup>23</sup>

Privacy extends beyond protection against physical intrusion and includes decisional autonomy in matters relating to belief, conscience, and identity. Religious affiliation is often a deeply personal matter, and compulsory disclosure of religious decisions may expose individuals to social pressure, discrimination, or public scrutiny.

The constitutional validity of notification requirements therefore depends upon whether they satisfy the standards of necessity and proportionality. If less intrusive mechanisms can adequately address concerns regarding unlawful conversions, mandatory disclosure requirements may be difficult to justify within a constitutional framework that values individual liberty and privacy.

## 9. Constitutional Secularism and Religious Neutrality

Indian secularism differs from models that require strict separation between religion and the State. Instead, it emphasizes equal respect for all religions and governmental neutrality in religious matters.<sup>24</sup> This constitutional principle requires the State to avoid favouring or disadvantaging any particular faith community.

The regulation of religious conversion must therefore be implemented in a manner that preserves neutrality and equal treatment. Anti-conversion laws cannot be constitutionally justified if they are used to suppress particular religions or restrict legitimate religious activities of specific communities. Their legitimacy depends upon consistent and impartial application directed solely toward preventing coercive or fraudulent conduct.

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<sup>21</sup> Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021.

<sup>22</sup> *Shakti Vahini v. Union of India*, (2018) 7 SCC 192.

<sup>23</sup> *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 SCC 1.

<sup>24</sup> *Aruna Roy v. Union of India*, (2002) 7 SCC 368.

The principle of secularism further requires that the State respect individual freedom of conscience and refrain from influencing personal religious choices. Thus, constitutional secularism serves both as a justification for preventing coercive conversions and as a limitation on excessive governmental intervention.

#### **10. Constitutional Morality and the Future of Religious Freedom**

The concept of constitutional morality has emerged as an important principle guiding contemporary constitutional interpretation. Constitutional morality requires adherence to the values of liberty, equality, dignity, and individual autonomy irrespective of prevailing social attitudes or majoritarian preferences.<sup>25</sup>

Religious conversion often generates social and political controversy because it involves issues of identity, community affiliation, and cultural continuity. Nevertheless, constitutional governance demands that individual rights receive protection even when they conflict with popular sentiment. The Constitution safeguards personal choices concerning faith and belief because such choices form an essential aspect of human dignity.

Therefore, the future constitutional assessment of anti-conversion laws will likely depend upon whether courts continue to prioritize autonomy, privacy, and freedom of conscience while recognizing the State's legitimate interest in preventing coercion and fraud. A constitutionally sustainable framework must protect individuals from unlawful conversion practices without undermining their right to voluntarily embrace a religion of their choice.

### **CONCLUSION**

The constitutional validity of anti-conversion laws in India continues to occupy a significant position in the discourse on religious freedom, secularism, and individual rights. While the Constitution guarantees freedom of conscience and the right to profess, practice, and propagate religion under Articles 25 and 26, these rights are subject to reasonable restrictions in the interests of public order, morality, and health. Consequently, the State possesses the authority to regulate religious conversions that are achieved through force, fraud, coercion, or undue influence. However, such regulatory measures must remain consistent with constitutional principles and should not encroach upon the fundamental freedom of individuals to choose and change their religion voluntarily.

The analysis reveals that anti-conversion laws serve a legitimate purpose when they protect vulnerable individuals from exploitative conversion practices. Nevertheless, concerns arise when statutory provisions employ vague terminology, impose burdensome procedural requirements, or permit excessive state intervention in matters of personal belief and religious identity. Such provisions may undermine the constitutional values of liberty, dignity, privacy, and autonomy that have been increasingly emphasized in contemporary judicial jurisprudence.

Furthermore, the constitutional commitment to secularism requires the State to maintain neutrality among religions and ensure that legal measures are applied fairly and without discrimination. The challenge, therefore, lies in striking an appropriate balance between preventing unlawful conversions and safeguarding genuine religious freedom. A constitutionally sustainable framework must protect freedom of conscience while ensuring that individuals are not subjected to coercion or manipulation. Ultimately, the legitimacy of anti-conversion laws depends upon their ability to uphold constitutional morality, respect individual autonomy, and preserve the pluralistic and democratic character of the Indian constitutional order.

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<sup>25</sup> *Indian Young Lawyers Association v. State of Kerala*, (2019) 11 SCC 1.

## RECOMMENDATIONS

To ensure constitutional compliance, anti-conversion laws should clearly define terms such as “force,” “fraud,” “allurement,” and “undue influence” to prevent arbitrary interpretation and misuse. Legislative provisions must focus exclusively on coercive and deceptive conversion practices while safeguarding voluntary religious choice. Mandatory prior permission or excessive reporting requirements should be reconsidered to protect individual privacy and freedom of conscience. Regular judicial oversight should be strengthened to prevent discriminatory enforcement and protect minority rights. Furthermore, public awareness programs promoting religious tolerance, interfaith dialogue, and constitutional values should be encouraged to foster social harmony while preserving the fundamental right to religious freedom.

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