

**IN THE HIGH COURT OF ANDHRA PRADESH AT  
AMARAVATI**

WP(PIL).No. 115 OF 2025

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AMARAVATI  
DATE: 05-Feb-2026

Petitioner-in-person

**IN THE HIGH COURT OF ANDHRA PRADESH AT  
AMARAVATI**

WP(PIL).NO. 115 OF 2025

**Between:**

Sandeep Bhavan Pamarati, Occ: Advocate at AP High Court  
(AP/646/2022),

Room No.501, Balaji Gents PG & Hostel,  
Near Nirmala Junior College, Kothapeta,  
Mangalagiri, Guntur District, A.P. PIN: 522503  
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Email: Sandeep.Pamarati@Gmail.com

Website: www.ShadesOfKnife.in PAN: ANXPP0067C ..Petitioner/s

**AND**

1. State of Andhra Pradesh,  
Represented by its Principal Secretary, Home Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237

2. State of Andhra Pradesh,  
Represented by its Principal Secretary, Revenue Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237

3. State of Andhra Pradesh,  
Represented by its Special Secretary, Women Development and Child  
Welfare Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237 ..Respondent/s

**REJOINER FILED ON BEHALF OF THE PETITIONER TO THE  
COUNTER AFFIDAVIT FILED BY RESPONDENT NO.3**

MOST RESPECTFULLY SHOWETH:

I, Sandeep Bhavan Pamarati, Occ: Advocate at AP High Court  
(AP/646/2022), R/o Room No.501, Balaji Gents PG & Hostel, Near  
Nirmala Junior College, Kothapeta, Mangalagiri, Guntur District, A.P.  
PIN: 522503 now having temporarily come down to AMARAVATI, do  
hereby solemnly affirm and sincerely state as under:

1. That at the outset, it is submitted that the reply of the  
Respondent No.3 is factually incorrect and unsustainable and  
unsupported by record, and fails to address the core issues  
raised in the writ petition.

2. It is submitted that the contents of the Counter Affidavit of the Respondent No.3 to the extent they are inconsistent with the submissions made hereinafter and in the writ petition are incorrect and are denied unless any averment or contention is specifically admitted.
3. It is submitted that the Counter Affidavit filed by the Respondent No.3 is full of contradictions to the facts in the writ petition along with the annexed documents and provision of Section 8B of the Dowry Prohibition Act 1961 (hereinafter 'DP Act') and therefore are liable to be rejected by this Hon'ble Court.

**PRELIMINARY SUBMISSIONS OF THE PETITIONER:**

1. The Petitioner reiterates that the present PIL is not adversarial in nature but is intended to assist this Hon'ble Court in ensuring effective enforcement of a welfare legislation, with full cooperation from the Respondents.
2. I have read and understood the Counter Affidavit filed by **Respondent No.3**. Save and except what is expressly admitted herein, all averments, contentions, and inferences therein are **denied as misleading and evasive**, since the Respondent No.3 failed to pointedly address the issues raised in the writ petition and touched upon the peripheral aspects that are of no importance or relevance.

3. At the outset, it is respectfully submitted that the Counter Affidavit **fails to respond to the core constitutional challenge** raised in the writ petition and instead confines itself to administrative explanations regarding appointment of Dowry Prohibition Officers (hereinafter 'DPOs'), related welfare schemes and awareness programmes put out by the State government of Andhra Pradesh, none of which address the failure of the Respondent Nos.1 and 2, as pleaded by the Petitioner in the writ petition, in not complying with the G.O.Ms.No. 69 issued by the Respondent No.3 in 1989, **some 36 years ago.**

**PARA WISE REPLY TO THE COUNTER AFFIDAVIT OF THE RESPONDENT NO.3:-**

1. That the contents of the **paras 1 to 4** of the Counter Affidavit of the Respondent No.3 need no reply, they being admitted facts.
2. That the stand of the Respondent No.3 taken in **para 5** of the Counter Affidavit of the Respondent No.3 that, *'section 8 (B) (3) is a provision which is directory in nature which has given the authority to the State Governments, in a "may" situation to confer the powers of a Police Officer on the Dowry Prohibition Officer to exercise such powers, however, as evident from the language of the Act, the Dowry Prohibition*

*Officer is a creation of a statute for effective implementation of the provisions of the Act and conferring the powers of a Police Officer on such Dowry Prohibition Officer is an Act of administrative exigency to cope up with the need of the day.*

***However, such an arrangement would not in totality nullify the role of a Police Officer in implementing or exercising their duties under the Act. Therefore, the statement that the Police Officers are usurping their duties by investigating into the offences relating to the Dowry Prohibition Act, even in the existence of powers conferred on RDO / Sub-collector is unjustified for all considerations.***

*At this juncture, it is pertinent to mention that the authority to confer the powers which are akin to the role of a Police Officer on the Dowry Prohibition Officer doesn't in toto eradicate the role of Police Officers in exercising their duties related to the job chart.' does not explain why did the Parliament envision an enabling instrument to the State Police department within State Government unless it were to operate independent of the State Police department. Any interpretation that renders Section 8B otiose after its invocation defeats the very object of the statute.*

3. That, it is pertinent to note two facts and dispel the factually inaccurate representations made by the Respondent No.3, in following terms.

- a. State Government of Andhra Pradesh has already exercised its powers conferred upon it by the Parliament u/s 8B of DP Act so there is no validity to the argument of the Respondent No.3 about the '*in a "may" situation*'.
- b. As per Section 8B(1), '***The State Government may appoint as many Dowry Prohibition Officers as it thinks fit...***'
- c. As per Section 8B(3), '***The State Government may, by notification in the Official Gazette, confer such powers of a police officer as may be specified in the notification on the Dowry Prohibition Officer who shall exercise such powers...***'
- d. As per Section 8B(4), '***The State Government may, for the purpose of advising and assisting Dowry Prohibition Officers in the efficient performance of their functions under this Act, appoint an advisory board***'.

(Emphasis supplied)

4. That, the contents of the **para 6** of the Counter Affidavit of the Respondent No.3 are denied since they are clearly misleading as from the plain reading (therefore no occasion

arises for any interpretation of any sort) of the provision u/s 8B(2) makes it abundantly clear that the State Government may appoint/designate any officer working under it, as a Dowry Prohibition Officer and such officers are conferred with police powers under G.O.Ms.No. 69 so that they may exercise their statutory duties and functions in an effective way, as envisioned by the Hon'ble Parliament. It is important to note that the very department which issued the G.O.Ms.No. 69, is opposing its true implementation by taking superficial and legally-unsustainable arguments in their Counter Affidavit, especially when the Respondent No.3 fails to establish how the Respondent No.1 continues to hold jurisdiction under the DP Act, even after passing the impugned G.O.Ms.No. 69. It seems an attempt to dilute the Legislative intent, especially where no Counter is yet filed by the Respondent Nos.1 and 2 explaining their respective stands before this Hon'ble Court.

5. That, unfortunately, the Respondent No.3 is silent about the mandatory provision **u/s 8B(2) of DP Act**, which indicate that while Sections 8B(1), (3) and (4) are discretionary in their initiation, which have been repeatedly asserted by the G.O.Ms.No. 69-issuing Respondent No.3 in paras 5 and 6 of the Counter Affidavit but the Section 8B(2) prescribes mandatory statutory functions that attach once a Dowry

Prohibition Officer is appointed. The Section 8B(2) of the DP Act is extracted below for the kind consideration of this Hon'ble Court.

**8B. Dowry Prohibition Officers.—**

(1) xxxx

(2) Every Dowry Prohibition Officer **shall exercise and perform the following powers and functions, namely:—**

(a) **to see that the provisions of this Act are complied with;**

(b) **to prevent, as far as possible, the taking or abetting the taking of, or the demanding of, dowry;**

(c) **to collect such evidence as may be necessary for the prosecution of persons committing offences under the Act; and**

(d) **to perform such additional functions as may be assigned to him by the State Government, or as may be specified in the rules made under this Act.**

(Emphasis supplied)

6. That, even if it is accepted, for argument's sake, that the entrustment of the duties u/s 8B of DP Act to the DPOs is only enabled provision, and that the Respondent No.1 (State Police Department) continues to hold jurisdiction under the DP Act, the Respondent No.3 failed to bring on record any facts supported by accurate data to prove that such an arrangement of DPOs have been assisting the State Police Department in a way wrongly interpreted by the Respondent No.3. It is obvious that the structure the Respondent No.3 attempts to portray before this Hon'ble Court never existed and there is no trace of evidence brought on record of this

case, proving that the DPOs have been performing just an enabling function and supporting the State Police in investigating the Dowry-related complaints and cases, since the year 1989. It is submitted that the Respondent No.3 (since Respondent No.3 has been supporting Respondent Nos.1 and 2 in their Counter Affidavit) is still within their legal right to file a supplementary Counter Affidavit, with material supporting their stand in their Counter Affidavit.

7. That, the contents of the **para 7** of the Counter Affidavit of the Respondent No.3 are denied with respect to Para 12 of the writ petition since they are wrong and patently misleading. The Respondent No.3 did not address the 12 examples of situations where specialist officers as appointed under special laws were entrusted with investigating special crime that may not have been covered under Indian Penal Code, 1860 and such special statutes envisage specialized enforcement mechanisms distinct from the general police machinery, which are rendered otiose when not operationalized. It is settled position of law that, '**generalia specialibus non derogant**' dictates that a special law (lex specialis which is the DP Act) prevails over a general law (lex generalis which is IPC, 1860) when both cover the same subject matter (dowry offences defined under section 3 and 4 of DP Act and not defined under

IPC at all) and such a position, if accepted, would run contrary to settled principles governing special statutes. That is an ask which violates all canons of the law, as known to our Hon'ble Constitutional Courts. Even assuming concurrent jurisdiction, the complete non-activation of DPOs defeats the very legislative design. This assertion by the Respondent No.3 leads to the irrefutable conclusion that in the following terms, which leads to the colourable exercise of powers by the Respondent No.1 which were actually entrusted to the Respondent No.2 by the G.O.Ms.No. 69-issuing Respondent No.3, which is impermissible in law.

- a. there are overlaps and confusion about the enforcement jurisdiction between the State Police Department (who are appointed under a statute called as IPC, 1860 under section 21-'Public Servant' *Eighth* which corresponds to Section 28(g) of Bharatiya Nyaya Sanhita, 2023) and the Statutorily-appointed DPOs,
- b. Absence of legislative clarity on who is to prosecute whom under the DP Act,
- c. Selective and discretionary application of penal provisions.

8. That, the contents of the **para 8** of the Counter Affidavit of the Respondent No.3 are denied since they are irrelevant to

the core implementation of provision under Section 8B of DP Act, which is what the subject of the present writ petition is. It is not the case of the Respondent No.3 that the G.O.Ms.No.37 mentioned in this para talks about either appointment of DPOs, the conferment of Police Powers to them or talks about the duly exercise of functions and powers by the DPOs, as entrusted to them under the impugned G.O.Ms.No.69. It is for the Respondent No.3 to state how setting up 'NMEW State Resource Centre for Women' addresses the core contentions raised under DP Act in the writ petition. Hence the statements in this para are not applicable to the subject matter before this Hon'ble Court in the present writ petition and as such as denied as being irrelevant.

9. That, the contents of the **para 9** of the Counter Affidavit of the Respondent No.3 are denied since they too are similarly irrelevant as they do not address the core contentions raised under DP Act in the writ petition. It is for the Respondent No.3 to answer how setting up of '**Mahila Sakthi Kendras**' under 'Mission Sakthi' programme to make people aware about the legal provisions dealing with the menace of dowry, domestic violence etc. will satisfy the statutory duties entrusted upon the DPOs through G.O.Ms.No. 69. It is evident that this Para is irrelevant to the lis and has no true purpose in the Counter Affidavit of Respondent No.3, with a view to assist this Hon'ble

Court in the present writ petition, which is filed in Public Interest and by definition is not adversarial in nature. The Petitioner only intends to give life to a decades-long ignored legal exercise.

10. That, the contents of the **para 10** of the Counter Affidavit of the Respondent No.3 are denied since they are irrelevant to the effective implementation of G.O.Ms.No. 69 issued by the Respondent No.3, since it doesn't talk about the work done by any Dowry Prohibition Officer either in the erstwhile combined State of Andhra Pradesh and the present residue Sunshine State of Andhra Pradesh. It is to be observed that the Respondent No.3 repeatedly tries to submit that by establishing **One-stop centre under Mission Shakti programme, '8,825 awareness programmes were conducted at village, mandal and district level. These activities help in disseminating information on legal provisions, rights, entitlements and services / redressal form available for the victims of domestic violence, dowry prohibition frameworks.'** It is pertinent to note that this submission is as irrelevant and far from the core issue being brought up by the Petitioner before this Hon'ble Court. The thinking by the Respondent No.3 that by conducting **awareness programmes** and **disseminating information alone**, Dowry menace can be contained and

eradicated as intended by the Hon'ble Parliament does not address the statutory mandate. If anything, such ***awareness programmes*** and ***disseminating information*** can only boost up reporting of crime to Police (as is the current state of dowry crime reporting in Andhra Pradesh), which is not the key aspect being brought up by the Petitioner seeking the effective implementation of G.O.Ms.No. 69 issued by the Respondent No.3. The statistics from the NCRB's annual reports 'Crime In India' (**from year 2016 to 2023**) shows that there is **NO** gradual increase in the crimes reported in Andhra Pradesh under DP Act, which indicates that despite of Respondent No.1 (State Police Department) alone conducting the investigations of Dowry crimes under DP Act, and while the Respondent No.2 (Revenue Department) is totally oblivious of their entrusted duties under the DP Act, there is no real impact caused by the impugned G.O.Ms.No. 69 issued by the Respondent No.3. The Petitioner does not dispute the utility of awareness programmes, but submits that they cannot be a constitutional substitute for statutory enforcement. The statistics taken from NCRB's annual reports 'Crime In India' (**from year 2016 to 2023**) are captured in the following table for the consideration of this Hon'ble Court. For a comparative study, statistics from the Section 498A and 304B IPC are also captured. These numbers are despite no

actions taken by the DPOs/Respondent No.2 since issue of G.O.Ms.No. 69 in 1989, but solely due to work of Respondent No.1.

No of Cases instituted year-wise								
Provision of Law	2016	2017	2018	2019	2020	2021	2022	2023
U/s 498A IPC	6,461	7,156	6,831	7,851	6,546	7,092	11,964	10,594
U/s 304B IPC	193	152	140	112	111	108	100	95
Dowry Prohibition Act, 1961	592	434	320	472	435	11	298	353
<b>Sources:</b> As per following								
1. Tables for <b>IPC Crimes</b> (Crime Head-wise & State/UT-wise)								
2. Tables for <b>SLL Crimes against Women</b> (Crime Head-wise & State/UT-wise)								

11. That, the contents of the **para 11** of the Counter Affidavit of the Respondent No.3 are denied since the bifurcation of State of Andhra Pradesh happened in **2014** and it clearly indicates the failure of all the three Respondents in effective implementation of G.O.Ms.No. 69 issued by the Respondent No.3 even in **2025**, which is the primary concern raised by the Petitioner in the present writ petition. The very existence of these awareness programmes implicitly admits that the penal provisions under DP Act themselves are not functioning as deterrents and hence the introduction of DPOs as dedicated officers under the DP Act through G.O.Ms.No. 69.

12. That, the Respondent No.3 has conveniently ignored the still pending case before the Hon'ble Allahabad High Court (at Allahabad Bench), in **APPLICATION U/S 482 No. - 10631 of 2024**, and it shows that the Respondent No.3 fails to

discharge his burden to assist this Hon'ble Court in resolving a long-neglected aspect that ought to have resulted in an effective implementation of DP Act in the State of Andhra Pradesh. The relevant paras from the supra cited Order are cited in the main writ petition and the same may be read into this Rejoinder. One para is reproduced hereinbelow for the kind consideration of this Hon'ble Court. The relevance of the said proceedings lies in the Court's insistence on demonstrable action by Dowry Prohibition Officers, which is conspicuously absent here.

***"9. In the event, the State Government has appointed Dowry Prohibition Officers, it is then imperative that the steps taken by such Dowry Prohibition officers towards implementation of the provisions of the Dowry Prohibition Act is shown in respect of preparation of list of presents given in the marriage as per section 3(2) of the Dowry Prohibition Act. The State Government shall also disclose the orders issued for implementation of the Dowry Prohibition (Maintenance of Lists of Presents to the Bride and Bridegroom) Rules, 1985. The Dowry Prohibition Officers are enjoined with the duty to ensure compliance of the Dowry Prohibition Act and the Rules framed thereunder. The affidavit shall also disclose how many Dowry Prohibition Officers have been appointed throughout the State and at what level."***

(Emphasis supplied)

13. That, the Petitioner came across another writ case decided by the Hon'ble High Court of Kerala at Ernakulam, ***Dr. Indira Rajan Vs Union of India and Ors*** in WP(C) No. 13635 of

2021, decided on 31 Jan 2023. Even though, the Petitioner therein raised the failure of implementation in the State of Kerala in its true sense but the High Court expressed its inability to amend the '*Dowry Prohibition of (Maintenance of Lists of Presents to the Bride and Bride Groom) Rules, 1985*', in the Para-7 of the judgment.

14. That, the admissions contained in the Counter Affidavit regarding Section 8B being only an enabling provision and not one of mandatory in nature indicates that the Respondent No.3, though the issuer of the G.O.Ms.No. 69 issued by the Respondent No.3, doesn't have any seriousness in adhering to the Legislative intent and to the Authority of the State Government to enforce the mandate given u/s 8B of DP Act, in true letter and spirit and this conduct is event from the fact that the Respondent No.3 totally ignored to admit/deny the fact that the said DPOs who were appointed in the year 1989 were functioning and exercise their jurisdiction and powers under this Act as mandates u/s 8B(1) of DP Act. As is crystal clear from the Annexure annexed to this Counter Affidavit with respect to G.O.Ms. No 69 on **Page-10**, the Column No.2 listed only the Advisory Committee members only and not a single district has any Dowry Prohibition Officer (being a Revenue Divisional Officer or Sub-Collector as mandated in the

G.O.Ms.No 69) identified/named. Furthermore, as per the Annexure annexed to this Counter Affidavit with respect to G.O.Ms. No 117 on **Page-09**, none of the said meetings (allegedly of the Advisory Boards) were conducted prior to 2025 and even going by the Column No.3 of this Annexure, it is clear that they conducted their first ever Advisory Board meeting (single digit, '1') only after the filing of the present Writ Petition and issue of Letter from the Respondent No.3. The timing of the annexures filed along the Counter Affidavit demonstrates that the steps relied upon by Respondent No.3 were initiated only after the filing of the present writ petition so that the first of Advisory Board meetings may be conducted. It is to be noted that exactly half of the districts did not find time to conduct their first-ever Advisory Board meetings in the past six months. In this regards, the Petitioner submits a copy of a letter issued by this very Respondent No.3 (i.e., Director from Women Development and Child Welfare Department) to all the District Collectors and District Magistrates vide Letter Lr. No WDC02-25022/6/2019-PROGRAMS SEC, Dt.04-08-2025, as **Annexure-P1** for the kind consideration of this Hon'ble Court, which primarily concerns only about constitution of the Advisory Boards and has nothing to do about DPOs. Thereby, it is submitted that the Respondent No.3 successfully sidelined the primary aspect

in the present writ petition which seeks true and committed implementation of G.O.Ms.No 69. That, precisely is the heavy emphasis of the Respondent No.3 on the first-time constitution of the Advisory Boards in the year 2025 and no mention of the acts mandatorily to be performed by the DPOs as mandated under Section 8B(2).

15. Furthermore, going by the very argument of the Respondent No.3 that DPOs are '***a creation of a statute for effective implementation of the provisions of the Act***' u/s 8B(3) of the DP Act, the Advisory Boards are also '***a creation of a statute, for the purpose of advising and assisting Dowry Prohibition Officers in the efficient performance of their functions under this Act***' u/s 8B(4) of the DP Act, but the Respondent No.3 doesn't talk about DPOs anywhere in their entire Counter Affidavit. This Hon'ble Court may be pleased to direct the Respondents, particularly the G.O.Ms.No 69-issuing Respondent No.3 to file a supplementary Counter Affidavit shedding considerable light the actions taken by the DPOs appointed in the State of Andhra Pradesh from 1989 to till date and their achievement in numbers, while enforcing the provisions of the DP Act, as mandated u/s 8B (2) of the DP Act, which fact is sorely missing

in the Counter Affidavit filed by Respondent No.3 dt: 28-Jan-2026.

16. That, it is revealing that the Respondent No.3 has totally ignored the mandate given by the Hon'ble Apex Court in W.P.(C) No. 000499 / 1997, Registered on 13-Sep-1997 and disposed on **02-May-2005** and was titled '**IN RE: ENFORCEMENT & IMPLEMENTATION OF vs. DOWRY PROHIBITION ACT, 1961**' [(2005) 3 S.C.R. 1020, 2005 **INSC 243**], due to which the Petitioner has concluded that the Respondent No.3 has no intention of honoring the mandate given by the Apex Court also by filing an internally inconsistent Counter Affidavit. The relevant para-10 from this Judgment is extracted below, reminding the Constitutional Court such as this Hon'ble Court, of the duty that they are entrusted with.

***"10. When there is failure on the part of the Executive to strictly implement a law like the one in question, enacted to tackle a social problem which has assumed menacing proportions, the Court has a duty to step in with a mandamus to direct its implementation rigorously and effectively. In that context, we find that it is necessary to step in and issue some more directions to the Respondents in addition to incorporating the directions already issued by this Court by way of interim measure as part of this final judgment."***

(Emphasis supplied)

17. That, it is a noticeable fact that even though the present Counter Affidavit was filed by the Respondent No.3, and as no Counters are filed by the Respondent Nos.1 and 2 till the date of filing the present Rejoinder, the Director from Women Development and Child Welfare Department, takes upon himself to defend the Respondent Nos.1 and 2, even though G.O.Ms.No. 69 issued by the Respondent No.3 was never complied with, for **some 36 years ago**, until the present writ petition is filed. Nowhere in the entire of the Counter Affidavit, the Respondent No.3 stated that the Dowry Prohibition Officers (RDOs and Sub-Collectors) have been performing their duties as mandated u/s 8B of DP Act including effective implementation of the following Central and State Rules.

a) Dowry Prohibition (Maintenance of Lists of Presents to the Bride and Bridegroom) Rules, 1985

b) AP Dowry Prohibition Rules, 1998

18. That, the Respondent No.3 (i.e., Director from Women Development and Child Welfare Department) failed to bring about even a single reasonably valid legal ground while filing his Counter Affidavit, against which the present Rejoinder is being filed by the Petitioner. Instead of seeking dismissal of the writ petition, the Respondent No.3 could have directed his efforts to acknowledge the lack of operationalization of the

Dowry Prohibition Officers in the State of AP and take steps to bring about the necessary steps to operationalize the Dowry Prohibition Officers in accordance with the AP Dowry Prohibition Rules, 1998 and also taking gainful inputs from the Dowry Prohibition Rules framed by various other States, under the DP Act to ensure that there is uniform implementation of a Central legislation resulting in clean administrative harmonisation. This Hon'ble Court may, in exercise of its writ jurisdiction, be pleased to **direct the State to operationalize Dowry Prohibition Officers by assigning them minimum functional duties, as already recognized in State Rules framed by other States under the same Central Act.**

19. That, after perusing the duties entrusted to the Dowry Prohibition Officers appointed by various other State Governments in strict enforcement of their State Dowry Prohibition Rules, the Petitioner compiled a Comparative duties table annexed as **Annexure-P2**. It is hoped that the Respondent No.3 does take initiation to peruse the **Annexure-P2** so that a more comprehensive plan of action may be put together in consultation with Respondent Nos.1 and 2 for efficient implementation of the Section 8B of DP Act.

20. That, from a causal view of the content in **Annexure-P2**, **without any prejudice to the discretion of the Respondents/State Government**, and **for singular objective of the effective implementation of Section 8B of the DP Act**, the following minimum functions may be operationalized for the Dowry Prohibition Officers in Andhra Pradesh, taking the best practices from various States.

**a. Receiving Complaints**

- i. Receive complaints from aggrieved persons, relatives, NGOs, or public.
- ii. Maintain a register recording receipt, nature, and outcome.

**b. Preliminary Enquiry**

- i. Conduct discreet verification of alleged dowry transactions.
- ii. Collect basic material facts for further action.

**c. Preventive Measures**

- i. Issue warnings or advisories where dowry demand is apprehended.
- ii. Facilitate voluntary compliance with the Act.

**d. Assistance in Prosecution**

- i. Recommend cases for prosecution under Sections 3/4 where necessary.
- ii. Assist investigating agencies with statutory inputs.

**e. Record Maintenance**

- i. Maintain complaint, enquiry, and action registers.
- ii. Preserve records for audit and judicial review.

**f. Reporting**

- i. Submit quarterly reports to the State-level Chief DPO.
  - ii. Include number of complaints, actions taken, prosecutions recommended.
- g. **Coordination**
  - i. Coordinate with Police, Revenue, Women & Child Welfare Departments.
  - ii. Liaise with Advisory Boards under the Act.
- h. **Awareness (Ancillary)**
  - i. Conduct awareness activities as **supportive**, not primary, function.

21. That, the entire emphasis of the Respondent No.3 has been on protecting the unavailable powers of Respondent No.1 and constitution of Advisory Boards and silent about the key/core element of the present Writ (PIL) petition that is, total failure of DPOs in performing their duties under **G.O.Ms.No. 69**. The mere fact that the Respondent No.3 is supporting the Respondent No.1 and left the Respondent No.2 in the lurch indicates that it has the effect of defeating true and effective implementation of **G.O.Ms.No. 69** in the State of Andhra Pradesh, which were taken up by the Constitutional Court both and High Court and Supreme Court and the Respondent No.3 choosing not to assist this Hon'ble Court by not align to delivering the Legislative Intent. Failure of Revenue Authorities acting as DPOs stands admitted by silence.

22. That, if creating awareness programmes was the sole goal and achievement of Respondent No.3, there was no need for a Penal statute in the first place. Creating awareness is a key but peripheral aspect in a statute, which has lost its enforceability (element of deterrence) since the DPOs did not begin working as mandated under the impugned **G.O.Ms.No.69**.

23. Finally, once the Respondent No.2 acts lawfully as prescribed under **G.O.Ms.No.69**, there is good scope for clear classification of the various offences under the DP Act and allows for targeting actions to address the key culprits.

**SUMMARY:** It is submitted that,

- there is a **Total and sustained Failure to operationalize G.O.Ms.No.69 (1989)**, not merely appointment in name.
- there is a **Total absence of evidence** showing Dowry Prohibition Officers (DPOs) ever exercising powers u/s 8B(2).
- there is a **Diversiónary tactic** employed by the Respondent No.3 (talks about awareness programmes, Mission Shakti, One Stop Centres and overlooks the implementation of G.O.Ms.No.69).
- Even if admitted that Section 8B(1), (3), (4) use “**may**” it is submitted that once the State of Andhra Pradesh has exercised such a discretion by issuing G.O.Ms.No.69, the downstream obligations under 8B(2) become mandatory in operation. It is settled principle of administrative law that, ***“Where a discretionary power is exercised, the consequences flowing from it are mandatory.”***
- The Respondent No.3 calls the DPOs as “creations of statute” but cannot show a single act performed by them in 36 years in his Counter Affidavit.
- The Advisory Boards are suddenly constituted only post-PIL and the Annexures filed by Respondent No.3 themselves expose non-compliance of G.O.Ms.No.69 in true letter & spirit.
- Best practices followed in other States may be implemented in Andhra Pradesh too.

## **REPLY TO PRAYER REPLY CLAUSE**

The contents of the Respondent No.3's Counter Affidavit in the prayer clause are frivolous and wrong and hence denied. Further, the prayer of the petitioner should be allowed, since the Respondent No.3 failed to dislodge the contents of the writ petition with cogent material.

As such, the Petitioner therefore reiterates all prayers made in the writ petition and prays that this Hon'ble Court may be pleased to grant appropriate reliefs by issuing a writ of mandamus directing **Respondent Nos.1 and 2 to implement G.O.Ms.No. 69 of WD&CD& Labour Dept, Dt: 24.06.1989 and G.O.Ms.No. 117 of Women's Development & Child Welfare (Prog) Dept, Dt: 12-12-1997 under Section 8B of the Dowry Prohibition Act, 1961, and directing Respondent No.3 to ensure the effective functioning of Dowry Prohibition Officers across Andhra Pradesh, in true letter and spirit, as the inaction of Respondent Nos.1 and 2 goes against the provisions under section 8B of Dowry Prohibition Act, 1961, as well as violative of principles of natural justice and violative of Articles 14 and 21 of the Constitution of India.**

DEPONENT/ Petitioner-in-person

AMARAVATI  
DATE: 05-Feb-2026

**IN THE HIGH COURT OF ANDHRA PRADESH AT  
AMARAVATI**

WP(PIL). NO. 115 OF 2025

**Between:**

Sandeep Bhavan Pamarati, Occ: Advocate at AP High Court  
(AP/646/2022),

Room No.501, Balaji Gents PG & Hostel,  
Near Nirmala Junior College, Kothapeta,  
Mangalagiri, Guntur District, A.P. PIN: 522503  
Cell: 9686942588

Email: Sandeep.Pamarati@Gmail.com

Website: www.ShadesOfKnife.in PAN: ANXPP0067C ..Petitioner

**AND**

1. State of Andhra Pradesh,  
Represented by its Principal Secretary, Home Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237

2. State of Andhra Pradesh,  
Represented by its Principal Secretary, Revenue Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237

3. State of Andhra Pradesh,  
Represented by its Special Secretary, Women Development and Child  
Welfare Department,  
A.P. Secretariat, Velagapudi,  
Amaravati, Guntur District. 522237 ..Respondent/s

**AFFIDAVIT**

I, Sandeep Bhavan Pamarati, Occ: Advocate at AP High Court  
(AP/646/2022), R/o Room No.501, Balaji Gents PG & Hostel, Near  
Nirmala Junior College, Kothapeta, Mangalagiri, Guntur District, A.P.  
PIN: 522503 now having temporarily come down to AMARAVATI, do  
hereby solemnly affirm and sincerely state as under:

1. That I am the Petitioner in the above noted Writ (PIL) Petition  
and am well conversant with the facts and circumstances of

the present case and as such competent to swear this affidavit of the Rejoinder.

2. That the contents of the accompanying Rejoinder have been drafted by myself, the statement of facts in the accompanying Rejoinder are true and correct as per my personal knowledge, information and belief and the same may be read as part and parcel of this affidavit and are not reproduced herein for the sake of brevity.

DEPONENT

Solemnly and sincerely affirm this  
the day of 05-Feb-2026  
and signed his name in my presence.

BEFORE ME

ADVOCATE :: AMARAVATI

VERIFICATION STATEMENT

I, Sandeep Bhavan Pamarati, Occ: Advocate at AP High Court (AP/646/2022), being the Petitioner/ person acquainted with the facts do hereby verify and state that the contents of the above paras of the Affidavit are true and correct to the best of my knowledge. Hence verified at AMARAVATI on this the day of 05-Feb-2026.

Deponent

Guntur District

**IN THE HIGH COURT OF  
ANDHRA PRADESH AT  
AMARAVATI**

WP(PIL). NO. 115 OF 2025

**REJOINDER FILED ON BEHALF  
OF THE PETITIONER TO THE  
COUNTER AFFIDAVIT FILED BY  
RESPONDENT NO.3**

Filed By:

Sandeep Bhavan Pamarati (9999)  
Petitioner-in-person  
(Cell: +91-96869-42588)