
LEGAL FRAMEWORK FOR INVESTIGATION OF CORRUPTION IN INDIA: AN OVERVIEW OF KEY STATUTES

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ABSTRACT

Corruption is one of the most deep-rooted threats to India's governance and development, damaging public trust and institutional integrity and hindering economic growth and social justice. This research paper offers a thorough examination of India's legal framework governing corruption investigations, analyzing the constitutional underpinnings, statutory details, institutional arrangements, and judicial precedents that together form the anti-corruption edifice of the nation. The research follows the historical development from old administrative orders to British colonial administration and on to recent post-independence reforms, examining major legislation such as the Prevention of Corruption Act 1988, provisions of the Indian Penal Code, and the path-breaking Lokpal and Lokayukta Act 2013.

By close scrutiny of investigating agencies like the Central Bureau of Investigation, Enforcement Directorate, and state vigilance departments, pathbreaking judicial precedents like the Vineet Narain case and current Supreme Court interventions, and analysis of ongoing challenges to the anti-corruption regime, this paper reveals both the strong positives and endemic weaknesses of India's corruption investigation machinery. The study identifies a strong but inherently sophisticated legal infrastructure that has developed significantly over seven decades of constitutional rule, with several layers of checks and balances, specialized processes, and institutional protections, yet still grapples with core impediments to implementation, inter-agency cooperation, and securing effective deterrence against corrupt behavior.

1. Introduction and Scope

Corruption in India is a multilayered problem that defies simple legal classification, including systematic misuse of public office for individual advantage, failures of the institutions of governance accountability, and complicated webs of influence that corrupt democratic structures and economic growth. The phenomenon has profound historical origins, dating back to ancient systems of administration recorded in classical sources, via medieval dynastic rule, colonial exploitation devices, to the modern day issues of a contemporary federal democracy regulating varied economic and social changes.

The need to investigate and prosecute corruption has required the creation of a growing sophisticated legal framework that must walk a multiplicity of competing tensions: ensuring effective law enforcement capabilities while upholding constitutional protections, extending full coverage to the multifaceted manifestations of corruption while avoiding the risk of procedural overload destroying effectiveness, and securing institutional independence while ensuring democratic accountability and oversight mechanisms.

This system functions within India's complex federal setup, in which constitutional partition of power between Union and State governments provides both scope for specialist reactions to local contexts and opportunities for coordinated action against corruption extending across jurisdictions or involving several levels of government. The legal system also has to provide room for India's multilateral legal traditions, integrating aspects of common law bequeathed from British colonial rule, indigenous legal principles, and contemporary statutory innovations with the aim of dealing with modern challenges of corruption.

The development of corruption investigation apparatuses mirrors greater changes in Indian governance from initial post-independence attempts at developing rudimentary legal pillars to phases of institutional consolidation, democratic deepening, economic liberalization, and modern globalization pressures that brought new varieties of financial crime and transnational corruption necessitating advanced legal remedies.

This research analysis investigates this complex structure by systematic examination of its most important structural elements, functional processes, and operational efficiency. Starting with constitutional roots that determine basic norms and limitations, the study then moves on through thorough analysis of statutory provisions, thorough examination of investigating

agencies and their mandates, critical evaluation of judicial advancements and interpretations, and assessment of issues facing it today and reform efforts.

The goal is to offer in-depth insight into how India's legal framework deals with corruption investigation both at the theoretical design and actual implementation levels, with a focus on key milestones in institutional progress and law reform while identifying ongoing challenges and areas that need sustained focus and improvement. The study relies on broad primary legal materials, judicial judgments, institutional reports, and recent scholarly analysis to offer a balanced evaluation of the system's strengths and weaknesses.

2. Constitutional Foundations and Theoretical Framework

2.1 Constitutional Mandate and Philosophical Foundations

The Indian Constitution does not directly deal with corruption as a separate constitutional category but sets out to create extensive philosophical and legal foundations that form the backbone of the overall anti-corruption legal regime through fundamental rights, directive principles, and institutional design elements that cumulatively establish duties of transparent, accountable governance while safeguarding individual liberty and due process rights.

Article 14, guaranteeing equality before law and equal protection of laws, forms a cornerstone of anti-corruption constitutional architecture by establishing the principle that all persons, including public officials, are subject to legal accountability without discrimination based on position, status, or political connections. This provision imposes positive obligations on the state to guarantee that corruption investigation and prosecution are carried out on equal footing irrespective of the accused individual's official status, while at the same time safeguarding people against arbitrary or discriminatory enforcement measures.

Article 21, safeguarding life and individual liberty, has been developed by way of judicial precedent into a full-fledged due process assurance that checks corruption investigation procedures while strengthening efficient anti-corruption actions¹. The wide-ranging interpretation of the provision by the Supreme Court, especially after the seminal *Maneka Gandhi v. Union of India* (1978) case, laid down that any procedure that cuts down on life and

¹ Evolution of Due Process in India," *Bharati Law Review*, Manupatra, available at <http://docs.manupatra.in/newsline/articles/Upload/C64E2EB3-321D-470D-A4C8-0EE5E55BA21A.pdf>

individual liberty needs to meet the requirements of substantive due process of being fair, just, and reasonable and not merely legal in form.

This constitutional framework works on foundational dual imperatives that influence all anti-corruption legislation and institutional design: giving the state the tools it needs to investigate and prosecute corruption effectively while avoiding having these powers become tools of oppression or political manipulation. The tension between these imperatives must be continuously calibrated through legislative fine-tuning, judicial oversight, and institutional protection from abuse while ensuring effectiveness.

The Directive Principles of State Policy, while not justiciable, offer further constitutional basis for anti-corruption efforts by setting goals of economic and social justice, curtailing inequality, and guaranteeing that governance would be in the interest of public good, and not private benefit. These principles are the source of constitutional justification for vigorous anti-corruption efforts while offering interpretive direction for reconciling competing interests when corruption investigation incurs other constitutional rights or values.

2.2 Federal Structure and Anti-Corruption Jurisdiction

India's federal constitutional framework has a strong bearing on corruption investigation through the separation of legislative and executive authority between Union and State governments, providing both opportunities for expert response tailored to local conditions and challenges in concerted action against corruption that crosses jurisdictional boundaries or involves sophisticated interplay among levels of government.

Constitutional allocation of powers influences corruption investigation in several ways. Powers over criminal law in general lie with Parliament in the Union List, allowing nationwide anti-corruption laws, whereas police and public order are state subjects in the State List, allowing states to take prime responsibility for law and order including investigation of corruption. It involves subtle coordination of central legislation and state implementation, sometimes resulting in gaps or clashes in the strategy of enforcement. Federal design also affects institutional design for corruption investigation agencies. Central agencies such as the CBI need to obtain state consent to function in state jurisdictions, demonstrating constitutional federal principles of federalism while occasionally making investigations that cross multiple states or involve both central and state officials more difficult. State agencies enjoy local

knowledge and quick-response advantages but can lack available resources or capabilities for sophisticated financial investigations involving specialized technical abilities.

3.Comprehensive Statutory Framework Analysis

Key Features of the Acts related to corruption

Indian Penal Code, 1860:

- The IPC defines “public servant²” as a government employee, officers in the military, navy or air force; police, judges, officers of Court of Justice, and any local authority established by a central or state Act.
- Section 169 pertains to a public servant unlawfully buying or bidding for property. The public servant shall be punished with imprisonment of upto two years or with fine or both. If the property is purchased, it shall be confiscated.
- Section 409 pertains to criminal breach of trust by a public servant. The public servant shall be punished with life imprisonment or with imprisonment of upto 10 years and a fine.

The Prevention of Corruption Act, 1988

- In addition to the categories included in the IPC, the definition of “public servant” includes office bearers of cooperative societies receiving financial aid from the government, employees of universities, Public Service Commission and banks.
- If a public servant takes gratification other than his legal remuneration in respect of an official act or to influence public servants is liable to minimum punishment of six months and maximum punishment of five years and fine. The Act also penalizes a public servant for taking gratification to influence the public by illegal means and for exercising his personal influence with a public servant.
- If a public servant accepts a valuable thing without paying for it or paying inadequately from a person with whom he is involved in a business transaction in his

² Section 21 of the Indian Penal Code, 1860, defines the term "Public Servant" as a wide-ranging category of individuals who are either in the service or pay of the Government, or a local authority, or are associated with a corporation, government company, or any other body established by law.

official capacity, he shall be penalized with minimum punishment of six months and maximum punishment of five years and fine.

- It is necessary to obtain prior sanction from the central or state government in order to prosecute a public servant.

The Benami Transactions (Prohibition) Act, 1988

- The Act prohibits any benami transaction (purchase of property in false name of another person who does not pay for the property) except when a person purchases property in his wife's or unmarried daughter's name.
- Any person who enters into a benami transaction shall be punishable with imprisonment of upto three years and/or a fine.
- All properties that are held to be benami can be acquired by a prescribed authority and no money shall be paid for such acquisition.

The Prevention of Money Laundering Act, 2002

- The Act states that an offence of money laundering has been committed if a person is a party to any process connected with the proceeds of crime and projects such proceeds as untainted property. "Proceeds of crime" means any property obtained by a person as a result of criminal activity related to certain offences listed in the schedule to the Act. A person can be charged with the offence of money laundering only if he has been charged with committing a scheduled offence.
- The penalty for committing the offence of money laundering is rigorous imprisonment for three to seven years and a fine of upto Rs 5 lakh. If a person is convicted of an offence under the Narcotics Drugs and Psychotropic Substances Act, 1985 the term of imprisonment can extend upto 10 years.
- The Adjudicating Authority, appointed by the central government, shall decide whether any of the property attached or seized is involved in money laundering. An Appellate Tribunal shall hear appeals against the orders of the Adjudicating Authority and any other authority under the Act.

- Every banking company, financial institution and intermediary shall maintain a record of all transactions of a specified nature and value, and verify and maintain records of all its customers, and furnish such information to the specified authorities.

3.1 Lokpal and Lokayukta Act, 2013: Institutional Innovation

The Lokpal and Lokayukta Act, 2013 represents a turning point in India's anti-corruption infrastructure, establishing ombudsman institutions with plenary investigative and prosecutorial powers independent of the influence of traditional government control systems.

It is the result of decades of civil society activism and evidence of recognition that effective anti-corruption policy involves institutional independence and extensive oversight capabilities which agencies in the classical form could not provide³.

Lokpal is a national institution with competence over all kinds of public servants such as the Prime Minister (with exceptions in matters pertaining to international relations, security, public order, atomic energy, and space), Ministers, Members of Parliament, and central government officials of all ranks. Such a wide coverage demonstrates an appreciation for the fact that effective anti-corruption control needs to reach the highest echelons of government while establishing procedures for dealing with systemic issues as opposed to individual cases. The institutional structure of the Lokpal involves provision for having several specialized capacities for addressing different aspects of corruption investigation and prosecution. The Inquiry Wing has civil court powers for preliminary investigation purposes, while the Prosecution Wing addresses prosecution of cases before special courts. The integrated system allows for continuity from investigation to prosecution with the same degree of specialized capacities being preserved at different phases of corruption cases⁴.

The Act enunciates complex steps for complaint processing, preliminary inquiry, and investigation, along with specified timeframes to ensure timely action while maintaining standards of proper investigations. The complaints are required to be cleared by way of preliminary inquiry within 90 days, with extension on the potential additional period of 90 days

³ "Lokpal and Lokayuktas Act, 2013: Key Provisions, Role, and Impact on Anti-Corruption in India," UPSC Geeks, available at <https://blog.upscgeeks.in/blog/general-studies-II/polity/lokpal-lokayuktas-act-2013-provisions-impact-accountability>

⁴ "Lokpal and Lokayukta: Re-defining the Socio-Political Dynamics in India," Indian Journal of Integrated Research in Law, Volume V Issue II, available at <https://ijirl.com/wp-content/uploads/2025/04/LOKPAL-AND-LOKAYUKTA-RE-DEFINING-THE-SOCIOPOLITICAL-DYNAMICS-IN-INDIA.pdf>

in complex cases, so as to immediately treat allegations of corruption while leaving enough time for proper scrutiny.

The superintendence jurisdiction of Lokpal over the Central Bureau of Investigation in reference cases is a significant institutional reform, guaranteeing autonomous direction of the investigation agencies with maintained specialized investigation capability. CBI investigating officers cannot be transferred without Lokpal permission after reference of cases in this scheme of things, fostering continuity in investigation and safeguard against political interference.

Lokpal also possesses widespread powers of attachment and recovery of assets, including the power to suggest provisional attachment of assets suspected to be proceeds of corruption.

These powers supplement the existing regime of asset forfeiture under the Prevention of Corruption Act and Prevention of Money Laundering Act without building jurisdictional overlap.

State-level Lokayukta institutions, established under the Act framework, provide similar capacities at state levels with scope for adaptation to local conditions and requirements. The Act provides model law to states with flexibility in implementation details, recognizing that effective anti-corruption institutions must be adapted to specific governance contexts but maintain essential capabilities and independence thresholds.

3.2 Criminal Procedure Code Framework for Corruption Cases

The Criminal Procedure Code, 1973 provides procedural guidelines of essential nature for investigation and prosecution of corruption cases along with special provisions to overcome specific challenges emanating from corruption cases like requirement of sanction to prosecute, establishment of special courts, and special trial procedures for facilitating effective prosecution and safeguarding individual rights.

Section 19 of the Prevention of Corruption Act, under the CrPC, establishes the condition of pre-sanction before prosecuting specific categories of public officials. The provision is in accordance with constitutional federalism and administrative independence principles on the one hand and protection against frivolous and malicious prosecutions that can de-legitimize genuine government operations on the other hand. However, the requirement of sanction also

invites scope for political interference in prosecution of corruption, calling for careful balancing of conflicting interests.

The sanction requirement has been subjected to intense judicial meaning making articulating criteria of evaluation, timeliness of decision, and judicial review processes. Courts have maintained that sanction decisions must be determined on the basis of objective criteria of law rather than political considerations, and established the fact that unreasonable delay in sanction determinations is a violation of requirements of due process and can be made subject to judicial review.

Special courts established within the anti-corruption system provide specialized capacity for handling complex corruption cases with technical expertise and streamlined procedure. These courts are designed to handle the unique challenges of corruption trials like complex financial evidence, long investigative processes, and multiple defendants with varied legal interests that need coordination and case management expertise over standard criminal courts.

The procedural model also contains within it provisions for witness protection and for whistleblowers as corruption cases are frequently constructed around the evidence of witnesses who may be exposed to retribution for assisting investigations. These protections include procedure for shielding identities, protection from physical harm, and judicial protection from negative employment action, though these provisions remain difficult to apply in practice.

4. Investigative Framework: Agencies and Mechanisms

4.1 Central Bureau of Investigation: Its Evolution and Strengths

The Central Bureau of Investigation (CBI) is India's premier anti-corruption investigation agency that evolved from the modest origins of the Special Police Establishment in 1941 to a full-fledged multi-divisional structure with specialized strengths to investigate complex corruption, economic offenses, and special crimes requiring technical input as well as inter-jurisdictional cooperation.

The institutional expansion of the CBI reflects broad development in corruption investigation requirements, from original focus on simple bribery cases to present challenges involving sophisticated financial crime, syndicates of corrupt activity, and sophisticated money laundering operations that require expert technical abilities and international cooperation. The

agency's organizational structure includes separate departments for different classes of cases, with anti-corruption units possessing specialized capabilities in financial investigation, cyber/electronic evidence management, and liaison with the regulator.

The organization operates under Delhi Special Police Establishment Act, 1946, which gives statutory basis to its investigative function and establishes oversight mechanism through Central Vigilance Commission in cases of corruption. The twin structure ensures specialist investigating capability without independent oversight so that it cannot be utilized for political purposes.

The jurisdiction of CBI is widened to corruption cases against central government officers, public sector undertakings, state government cases referred, and national importance cases for central investigation. The constitutional limitation of the agency is the requirement of state sanction before the case is investigated in state territories, in accordance with federal conventions sometimes making the investigation of cases across states challenging and requiring coordination between central and state officials.

The investigative capabilities of the agency encompass extensive search and seizure power, authority over documents and witnesses, authority to arrest suspects, and coordination with financial institutions and regulatory bodies. Some of the recent advances in technology include digital evidence collection capabilities, forensic accounting capabilities, and advanced data analysis capabilities that are required for contemporary financial crime investigation.

In spite of considerable institutional expansion, the CBI is still faced with recurrent issues like case backlogs, dearth of resources, and jurisdictional problems that sometimes compromise effective investigation at times. Recent information indicates over 6,900 corruption cases investigated by the CBI before courts pending trial, of which 361 had been pending for 20 years or more, evidencing systemic problems in judicial disposal affecting investigation agency performance.

The agency has established several reforms to increase efficiency and effectiveness like case management mechanisms, specialized investigation officer training, and coordination processes with other agencies. However, issues of political autonomy, availability of resources, and jurisdictional scope continue to require attention and reform.

4.2 Enforcement Directorate: Financial Intelligence and Asset Recovery

The Enforcement Directorate (ED), established in 1956 and significantly improved upon the enactment of the Prevention of Money Laundering Act 2002, performs more and more important functions in corruption investigation by virtue of its function to monitor proceeds of corruption, investigate money laundering aspects of corruption cases, and implement effective mechanisms for asset recovery which support traditional methods of corruption prosecution.

The ED works under a variety of statutory frameworks such as the Prevention of Money Laundering Act 2002, Foreign Exchange Management Act 1999, and Fugitive Economic Offenders Act 2018, giving complete coverage to financial elements of corruption cases. In PMLA, corruption offenses are "scheduled offences" giving rise to proceeds of crime, making it possible for ED investigation of money laundering aspects even when other departments deal with underlying corruption investigation.

The agency's investigative authority under PMLA is quasi-judicial in nature, covering authority to summon witnesses, search documents, undertake searches and seizures, arrest suspects, and temporarily freeze assets suspected to be proceeds of crime. The powers are designed to address the sophisticated money structures presumably used in modern corruption, requiring expert skills in financial investigation, tracing foreign funds, and complex procedures in asset recovery.

ED's recovery mechanisms are founded on the idea that effective anti-corruption strategy must ensure that corruption is not rewarding perpetrators at net financial terms. The strategy of the agency is not just attachment and forfeiture of direct proceeds of corruption but also property derived from such proceeds through multiple layers of financial arrangements aimed at obscuring traces to original corrupt acts.

The agency has registered significant success in asset recovery, conducting over 3,000 raids and seizing assets worth over ₹99 crore under the Prevention of Money Laundering Act during the last few years. High-profile cases like the investigation of Byju's involving ₹9,362 crore of potential foreign exchange rule violations demonstrate the agency's capability in pursuing complex financial investigations involving technical expertise and collaboration with foreign agencies.

But ED's increased involvement in corruption probes has also generated controversy concerning scope for misuse of broad powers, lengthy investigation process, and impact on business activity. The agency's quasi-judicial powers like admissibility of statements made to ED officers must be carefully weighed against investigation effectiveness and safeguarding individual rights and due process demands.

5. PROBLEMS AND CHALLENGES

Despite adequate laws to fight corruption in the public sector, it is still one of the biggest menaces Indian society is facing today to tackle corruption prevalent in our society. The Indian criminal justice system has been facing many problems and challenges in its fight against corruption, some of which are highlighted below:-

(a) No Law to tackle Corruption in the Private Sector. The Prevention of Corruption Act 1988 is the existing law in India dealing with offences relating to corruption. This law, however, was essentially enacted to take care of corruption cases in the public sector and by public servants, whereas in fact, there is widespread corruption in the private sector also which seriously hampers the overall growth and development of the country. After the liberalization of the Indian economy in the early 1990s, the private sector has expanded greatly. The problem of corruption in the private sector is increasing with the expansion of the private sector. Today it has assumed alarming proportions. It has become the single biggest menace to Indian society. Efforts are under way to enact laws to deal with corruption in the private sector as envisaged in the UNCAC.

(b) Inherent Delays in the Criminal Justice System. The system is painfully slow and punishments are not swift. As explained earlier, sec.19 of the Corruption Act requires prior permission of the competent authority to remove a public servant from his or her post before launching prosecution against him or her in court. This often delays the launch of a prosecution. Upon receiving reports from the investigating agencies seeking approval for a prosecution, the concerned authorities often take considerable time to grant such permission. Also, permission is sometimes denied on political and other grounds. The Corruption Act provides for trial of corruption cases under the act exclusively by the Special Judges. The number of Special Judges is highly insufficient compared to the number of corruption cases filed in their courts. As a result, these courts are overburdened and there is a large discrepancy in the number of cases disposed by the investigating agencies and the number of cases disposed by the courts, adding

to the backlog each year. During trial offences, adjournments are often taken or granted on various grounds. Further, the proceedings in the trial court are challenged at various stages by parties filing petitions in the same court as well as in higher courts. Appeals and revisions filed in higher courts against the order of the trial court often take years to be concluded.

(c) Hostile Witnesses.⁵ In order to convict a corrupt public servant, the prosecution has to prove its case beyond doubt. This is a strict legal requirement as per the Indian Evidence Act, the general law on evidence in India. There is no exception to this requirement even for corruption cases. Prosecution has to depend heavily on the testimony of witnesses to prove its case beyond doubt. However, witnesses often do not support the prosecution case because of influence, allurements and intimidation from the other side. There is no witness protection scheme, nor are there provisions for quick and effective action against witnesses who become hostile. As a result, witnesses frequently become unco-operative and spoil the prosecution case. Punishments are, therefore, not swift and effective under the Corruption Act and don't deter corrupt public servants.

(d) Ineffective Asset Recovery. Though there are legal provisions for confiscation and recovery of property acquired as proceeds of crime, such recovery is not easy. Corrupt public servants often acquire properties with the proceeds of crime in the names of their friends, relatives, family members and other acquaintances. Therefore, it is not easy to prove in court that such properties are the proceeds of crime. Such properties are quite often held offshore under strict privacy laws and it is not easy to trace and recover them, especially in the absence of desired international co-operation.

6. Conclusion

Corruption is found to be one of the most damaging consequences of poor governance and poverty, classified by lack of efficiency, transparency and accountability. Corruption diminishes investment and suppresses economic growth and development and also reduces the effectiveness of public administration. It diverts the public resources towards corrupt politicians and officials and away from the needy and poor people. So, corruption can be considered anti-poor and anti-development. Though there are adequate laws in India to fight

⁵ Section 157 of the Bharatiya Sakshya Adhiniyam (BSA), 2023, a "hostile witness" is one who refuses to support the party that called them, gives testimony contrary to their previous statements, or shows an intention to deceive the court or favor the opposing party.

corruption, they have been made ineffective. Corruption is still one of the biggest impediments to extending the benefits of development and progress to the poorest of the poor. The Indian criminal justice system is facing many problems and challenges in its fight against corruption. At present, there is no law to deal with corruption in the private sector, which has grown in leaps and bounds in the last two decades, as envisaged in the UNCAC. Offenders take advantage of the very strict requirements of Indian courts to prove every point beyond doubt. The system suffers from inherent delays; as a result punishment is not swift.

Corruption is considered a 'high profit-low risk' activity by corrupt public servants. Recoveries of assets, which are proceeds of crime, remain a big challenge. Such assets are often held offshore and getting them back is a Herculean task, especially in the absence of desired international co-operation. Many people think that only the government has the responsibility for eliminating corruption and we often blame the government; however, in view of the level of corruption and the existing framework that we have in India, it is very clear that the government alone cannot stop corruption. Civil society institutions too have a responsibility and duty to fight against corruption and take some actions to promote honesty and integrity. Furthermore, fighting corruption requires more than government policy, laws, tools and legal system; it requires awareness of our social responsibility, moral values, excellence in our daily work, etc. We need role models, campaigns, debates, and many different approaches to educate our people, to inspire our young generations, to change the mindset of corrupt people and to tackle every cause. Moreover it needs willingness, commitment and active participation of media, civic associations, voluntary groups, teachers, students, social workers, etc. In addition to the ongoing initiatives such as Citizens' Charters, RTI Act, social audit, e-governance, lokayukta, etc., which needs some improvement and a harmonized approach across all states? The central government is considering the introduction of a new "Lok Pal Bill" to put in place a mechanism to tackle corruption. Currently, public servants (such as government employees, judges, armed forces, police) can be prosecuted for corruption under the Indian Penal Code, 1860 and the Prevention of Corruption Act, 1988. However, the Code of Criminal Procedure and the Act require the investigating agency (such as CBI) to get prior sanction of the central or state government before it can initiate the prosecution process in a court. The 'Lok Pal Bill' was introduced for the first time in 1968 but it lapsed with the dissolution of the Lok Sabha. It was introduced seven more times in Parliament, the last time in 2001. However, the Bill lapsed each time except in 1985 when it was withdrawn. At the state level, so far 18 states have created the

institution of the Lokayukta through the Lokayukta Acts but loopholes in the “Lokayukta’ Act and the threat of strong punishment for “frivolous” complaints have discouraged people from stepping forward to report corruption and made these institutions helpless.