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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ W.P.(CRL) 241/2026, CRL.M.A. 2330/2026 & CRL.M.A. 2331/2026

SH. SATYENDER CHAUDHARY @ SATENDRA @ SATTE &
ORS.Petitioners

Through: Mr. H.S. Gulati, Advocate with
petitioners in person.

versus

STATE NCT OF DELHI AND ORSRespondents

Through: Mr. Sanjeev Bhandari, ASC (Crl)
with Mr. Arjit Sharma and Ms.
Sakshi Jha, Advocates.
SI Vivek Nandan.

Appearance not given for
respondent No.2

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN 41/2026

ORDER

% **22.01.2026**

1. Issue notice. Mr. Sanjeev Bhandari, learned Additional Standing Counsel (Criminal), accepts notice on behalf of the State. Learned counsel, accepts notice on behalf of the other respondents.

2. The present petition has been preferred under Article 226 of the Constitution of India seeking quashing of FIR No. 546/2024 dated 28.12.2024, registered at Police Station Mansarovar Park, Delhi, under Sections 333/115(2)/118(1)/127(2)/351(2)/238(c)/61(2)/3(5) of the Bharatiya Nyaya Sanhita, 2023 ["BNS"], on the ground that the disputes between the parties have been amicably settled.



3. The FIR in question arises out of an incident stated to have occurred on 27.12.2024. As per the allegations, the parties were acquainted with each other and had disputes arising out of a prior monetary transaction. It is alleged that in the afternoon, the petitioners had visited the office of respondent No.2, where discussions took place and an amount of Rs. 10,000/- was paid towards settlement of the dispute, following which the petitioners allegedly left after issuing threats. Later the same evening, it is alleged that the petitioners returned to the office, forcibly entered the premises, assaulted respondent Nos.3 to 5 with sticks, and thereafter also assaulted respondent No.2. It is further alleged that the office premises were vandalised, CCTV cameras were damaged, and cash and certain documents were removed. Respondent No.2 was subsequently taken to GTB Hospital, where his Medico-Legal Case was prepared.

4. The parties are present before this Court and have been duly identified by their learned counsel as well as by the Investigating Officer [“IO”]. They state that the disputes between them arose out of certain misunderstandings, which have since been amicably resolved. They further confirm that the settlement has been arrived at voluntarily, without any coercion or undue pressure, and without any monetary consideration.

5. The Supreme Court has clearly held that, in certain circumstances, the High Courts can quash criminal proceedings, even with respect to non-compoundable offences, on the ground that there is a compromise between the accused and the complainant, especially when no overarching public interest is adversely affected. Reference in this connection can be made to the judgment in *Gian Singh v. State of Punjab*



& Anr. [(2012) 10 SCC 303], which held as follows:

“58. Where the High Court quashes a criminal proceeding having regard to the fact that the dispute between the offender and the victim has been settled although the offences are not compoundable, it does so as in its opinion, continuation of criminal proceedings will be an exercise in futility and justice in the case demands that the dispute between the parties is put to an end and peace is restored; securing the ends of justice being the ultimate guiding factor. No doubt, crimes are acts which have harmful effect on the public and consist in wrongdoing that seriously endangers and threatens the well-being of the society and it is not safe to leave the crime-doer only because he and the victim have settled the dispute amicably or that the victim has been paid compensation, yet certain crimes have been made compoundable in law, with or without the permission of the court. In respect of serious offences like murder, rape, dacoity, etc., or other offences of mental depravity under IPC or offences of moral turpitude under special statutes, like the Prevention of Corruption Act or the offences committed by public servants while working in that capacity, the settlement between the offender and the victim can have no legal sanction at all. However, certain offences which overwhelmingly and predominantly bear civil flavour having arisen out of civil, mercantile, commercial, financial, partnership or such like transactions or the offences arising out of matrimony, particularly relating to dowry, etc. or the family dispute, where the wrong is basically to the victim and the offender and the victim have settled all disputes between them amicably, irrespective of the fact that such offences have not been made compoundable, the High Court may within the framework of its inherent power, quash the criminal proceeding or criminal complaint or FIR if it is satisfied that on the face of such settlement, there is hardly any likelihood of the offender being convicted and by not quashing the criminal proceedings, justice shall be casualty and ends of justice shall be defeated. The above list is illustrative and not exhaustive. Each case will depend on its own facts and no hard-and-fast category can be prescribed.”

[Emphasis supplied.]

6. In the present case, the proceedings between the parties have arisen out of a misunderstanding emanating from a monetary transaction, which has since been resolved by way of a settlement. There does not appear to be any overriding public element, which would require the criminal



proceedings to be taken to their logical conclusion. Applying the tests laid down by the Supreme Court, it is evident that the parties have categorically affirmed the voluntary nature of the settlement. In these circumstances, the continuation of the criminal proceedings is unlikely to result in a conviction. Rather, such continuation would unnecessarily burden the criminal justice system.

7. In view of the aforesaid, I am of the view that continuation of the criminal proceedings would serve no meaningful purpose. Accordingly, the petition is allowed, and FIR No. 546/2024 dated 28.12.2024, registered at Police Station Mansarovar Park, Delhi, under Sections 333/115(2)/118(1)/127(2)/351(2)/238(c)/61(2)/3(5) of the BNS, alongwith all consequential proceedings arising therefrom, is hereby quashed.

8. However, having regard to the nature of the allegations and the circumstances in which the FIR came to be registered, the petitioners are directed to collectively deposit costs of Rs.20,000/- with the Delhi High Court Bar Association Costs Account [A/C No. 15530110179338; IFSC No. UCBA0001553; UCO Bank, Delhi High Court Branch].

9. Affidavit of compliance be filed within three weeks from today.

10. The petition, alongwith pending applications, accordingly stands disposed of.

PRATEEK JALAN, J

JANUARY 22, 2026
SS/SD/