

“Dowry Death in India: The Incessant Disparagement of Women’s Rights”*Suvarna Dubey**Amity Law School,
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“A person who sells his son for money and he who takes bride-price for earning a living are both great thieves and go to hell” - Mahabharata

The dowry system in India involves a scenario in which the family of the bride gives property, both movable as well as immovable to the groom and his family as a condition for marriage. The system of dowry has been in practice in India since ancient times stemming from the then laws of succession and inheritance. Originally, dowry was given by the family of the bride to secure her financially after her marriage since back then women were not educated. However, despite the fact that times have progressed, and women nowadays are doing incredibly well in every single aspect, the social practice of taking dowry somehow still exists. The Dowry Prohibition Act, 1961 bans the giving and taking of dowry.

Dowry death is the killing of the wife by the husband or his family in relation to the demand of dowry. The expression used in India to refer to this phenomenon is “dowry deaths”. Over time, dowry death has become a cultural and ethnic offence prevalent in India and has been made an offence under Section 304-B of the Indian Penal Code but despite having such clear laws on the matter, dowry is a social evil that still persists.

The principle of gender equality has been clearly enshrined in the Constitution of India. It not only promotes equality and security of women but also encourages the state to adopt positive discrimination measures for the welfare of women. However, women are still considered the weaker/inferior sex by families with regressive mindsets and this is one of the main reasons why we haven’t been able to abolish dowry death.

Over the years, the cases of dowry death have seen quite an escalation in number. The data collected and analysed by the National Crime Records Bureau evidently shows that female dowry deaths account for 40 to 50 per cent of all female homicides recorded annually in India, representing a stable trend over the years 1999 to 2016. As per reports, there were 7,621 "dowry deaths" in 2016.¹ Dowry deaths rose from about 19 per day in 2001 to 21 per day in 2016.

Computing carefully the number of victims of dowry death is generally found to be troublesome. Families frequently do not report a dowry death due to the fear of being involved in the offence. The poor rates of revealing such instances can be attributed to over-worry for the culprit, disgrace or shame related with being an injured/affected individual, lack of confidence in the legal system, or fear of being accused for the harassment.

¹ National Crime Records Bureau, Crime in India 2016: Statistics 4 (2017)

This research paper shall analyse the gruesome offence of dowry death happening in India by focusing on the system of dowry in India, the relevant laws in force, the socio-economic condition of women and the attitude of people towards them, providing an insight on why this evil still exists in a progressively developing country like India. Through polls, surveys and other available statistics, the researcher aims to express the dynamics of this heinous offence and shall attempt to suggest legislative amendments and also other ways of spreading awareness amongst people to curb this heinous crime and protect the rights of women in India.

THE EVOLUTION OF THE SYSTEM OF DOWRY AND DOWRY DEATH IN INDIA

Chamber's - 20th century dictionary defines dowry as the property which woman brings to her husband at marriage sometimes used for dowry". The book Women and the Law says, "Dowry is a common phenomenon all over India and is understood to mean any property given by the bride's family to the bridegroom's family as a condition for the performance of marriage. It may be given in cash or in kind or both."² The system of dowry has been in practice in India since time immemorial stemming from the then laws of succession and inheritance. However, history suggests that dowry was not practised in ancient India, though the concept did exist evidently.

The term 'Yautraka' has been used in many ancient texts which refers to a material gift given to a couple joining in holy matrimony. Dowry was given by the family of the bride to secure her financially after her marriage since back then women were not educated. However, in Hinduism this practice stems from a ceremonial act called 'Kanyadaan'. It was also referred to as 'Hunda' which came from the word *handa* meaning pot. It was called so because in the early times dowry was mostly given in a pot.³

In Hindu marriage ceremonies, the kanyadaan is an important ritual. In this ceremony, the groom is given Varadakshina which may be in the form of either cash or kind and is given by the parents or guardians of the bride.⁴ This concept of Varadakshina was clarified in the case of *Sudharam v. Thandaveshwara*⁵. According to the court in this case, Varadakshina could not be kept or used by the groom's family for their personal benefit. The Court stated, "it was meant to serve as a nucleus of married couple as sort of matrimonial estate". It was held that Varadakshina is clearly dowry.

Even though the maximum number of dowry related offences happen amongst Hindus, it is not religion specific.

² N, Jayapalan, *Women and Human rights : Traditional Indian Society*, Atlantic Publishers, New Delhi, 2002, p. 2

³ Reshma and A Ramegouda, *Socio Legal Perspective of Dowry : A Study*, International Journal of Scientific and Engineering Research; Vol-3, Issue-7 (2012)

⁴ Mohd Umar, *Bride Burning in India: A Socio Legal Study*, Ashish Publishing House, Delhi, 1998, p. 66-67

⁵ *Sudharam v. Thandaveshwara* (1946) Tra. LR 224 (Full Bench)

In Sikhism, dowry is called Dehaj. It originally was intended to be spiritual in nature as Sikhism preaches that a woman should carry the name of the Lord with her when she starts her new life. However, over time, with the monstrous influence of greed, significance of dowry changed.

"O my father! Give me the Lord's Naam (Gur-Giaan, Aatam-Giaan, Shabad-Giaan ...) as my wedding gift / dowry. //4// (sggs 78)."⁶

In Islam the term Mehr translates to dowry. However, it does not hold the same significance as it does in Hinduism and Sikhism. In Muslim weddings, it is mandatory to fix an amount either as per the demand of the wife or as per the husband's own capability as Mehr and pay this amount to the wife. Mehr is the right of a Muslim Woman who is marrying and she is entitled to use it as per her own wishes. Dowry, in its traditional sense is considered 'haraam' in Islaam.

However, the only situation in which a woman may have to part with Mehr is if she decides to opt for a 'Khula'. A Khula is one of the few ways in which a Muslim woman can get a divorce herself. The husband then holds a right to demand a part or the complete Mehr back from her in exchange of agreeing to the divorce.

In the 3rd century, Megasthenes and Arrian said that only the inner and outer beauty of a woman were taken into consideration when a man was choosing his bride. Her fortune was not paid any attention.⁷ The Code of Manu explains both 'dowry' as well as 'bride wealth'. According to it, dowry was associated with the brahmanas whereas bride wealth was a concept associated with the lower castes.⁸ Manu recites :⁹

“आहूय दान कन्याया ब्राह्मो धर्मः प्रकीर्ततः ॥

यज्ञे तु वितते सम्यं गृत्वजे कर्म कुवुति ।

अलंकृत्य सुतादानं दैवं धर्म प्रचक्षते ॥

एकं गोमिथुनं द्वे वा वरादा दाय धर्मतः ।

कन्यां प्रदानं विधि व दार्षो धर्मः स उच्यते ।

सहोभौ चरतां धर्म मिति वाचानुभाष्य च ।

कन्या प्रदानं मध्यर्च्च प्राजापत्ये विधिः स्मृतः ॥”⁹

⁶ Gurbani available at <http://www.gurbani.org/articles/webart69.htm> (viewed on 10-3-2019)

⁷ Soumi Chatterjee, "Concept and Evolution of Dowry", IJHSSI Volume 7 Issue 01, 2018, p. 85-90

⁸ Stanley Tambiah and Jack Goody, *Bridewealth and Dowry*, Cambridge University Press., Cambridge UK, 1973, p. 68–69

⁹ Manusmriti - Chapter III Slokas 27-30

This paragraph talks about the Brahma form of marriage and how the groom is given clothes and ornaments at the time of the wedding. It also talks about ‘Arsh’ which refers to the giving of the bride in consideration of cows or bullocks.

Manusmriti also condemns giving away the bride in exchange of receiving wealth. It says :¹⁰

“न कन्यायाः पिता विद्वन् गृहणीयां च्छुलंकं मण्वपि

गृहणं श्छुलंकं हि लोभेन स्यान्रोऽपत्य विक्रयी ॥”

This paragraph expresses that the father of the bride must not take any wealth in consideration of marrying off his daughter as that would make him a seller of his child.

The Arthashastra is one such literary work that explains the concept of dowry in its present day form. While speaking of dowry it differentiates between ‘duhiti’ and ‘kanya’. Duhiti referred to the females who got married before the death of their father and Kanya referred to a female who got married after the death of her father i.e. someone who was married off by her brothers. In case of Duhiti, the father was liable to give dowry (including property, ornaments and other forms of wealth) to the daughter’s husband and his family and for Kanya, it was the responsibility of her brothers to give ‘pradanikam’/dowry out of their parental estate. The Dharmashastra also spoke of dowry in its present form and established the amount of dowry. It said that a daughter’s dowry in the property was one fourth of the sons’ share in the ancestral property.

The situation was at its worst during the Medieval period which is often referred to as the ‘dark age’ for women. With the advent of Mughal rulers, freedom was curbed and too many restrictions were imposed on Indian women, causing a great deal of insecurity amongst them. Such socio-political circumstances influenced indigenous psychology and resulted in various apprehensions and social issues related to women and children including child marriage, sati-jauhar and restrictions upon educating the girl child.¹¹

The modern era only proved to be the final nail in the coffin. Vinay Sharma remarked on developing framework/custom of dowry in his book 'Dowry Death' that when the British assumed control of India around the mid-nineteenth century, the dowry system had evolved into a cancerous phenomenon all through the nation.¹² Gandhi believed that dowry as a custom treated girls as chattels that were meant to be bought and sold. He critiqued the custom calling it “pernicious” since it degraded the status of women in the society, destroying their integrity and desecrating the ideologies of marriage. He said that in order to curb the virulent system of dowry, parents need to educate their daughters so that they can be

¹⁰ Manusmriti - Chapter III Slokas 51

¹¹ Vinay Sharma, *Dowry Deaths*, Deep & Deep Publication Pvt. Ltd., New Delhi, 2007, pp. 2

¹² Ibid., pp. 22

empowered and are able to refuse marrying a man who demands a price from them for marrying him.¹³

Eventually, with the backing of the British government, imperative administrative steps were taken. Thus, the Sind Deti-Leti Act, 1939 was enacted by Sind Provincial Government, containing comprehensive arrangements which disallowed the giving and taking of dowry as the deciding component of agreeing to or promising marriage. After independence, the two states of Bihar and Andhra Pradesh enacted their own states laws - the Bihar Dowry Restraint Act, 1950 and Andhra Pradesh Dowry Restraint Act, 1958, prohibiting the Giving and taking of dowry. Finally, on July 1st, 1961, Dowry Prohibition Act, 1961 was implemented.

To substantiate and help the Dowry Prohibition Act, 1961 in keeping from the expansion of dowry related viciousness, Section 498-A was consequently made a part of the IPC in 1983 eventually pursued by Section 304-B in 1986 which characterized the offense of dowry related demise of a woman.

CURRENT SCENARIO AND THE LAWS IN FORCE :

The unnatural passing of recently hitched young women in relation with dowry has become a normal feature of news today. Dowry deaths increased from about 19 each day in 2001 to 21 each day in 2016. The data collected and analysed by the National Crime Records Bureau evidently shows that female dowry deaths account for 40 to 50 per cent of all female homicides recorded annually in India, representing a stable trend over the years 1999 to 2016.

7634 ladies were scorched to death in India in 2015 because of dowry.¹⁴ This approximates to one married woman being scorched each hour. 30.6% of all such instances of dowry deaths were accounted for in Uttar Pradesh (2335 cases) alone, trailed by Bihar (1154 cases).¹⁵

For the purpose of prohibiting dowry and preventing dowry related offences we have some laws in force :

1. Dowry Prohibition Act, 1961 – It bans the giving and taking of dowry. The act defines dowry and penalizes it. It gives punishment to any individual giving or taking of dowry. The penalty is to not be under fifteen thousand rupees (Rs.15,000) along with as long as 5 years of detainment or what the Court may deem fit.¹⁶ On the off chance that an individual shows an interest in dowry, he can be made subject to pay a fine of Rs.10,000 and detainment for half a year which might be stretched out to two years.¹⁷ However, the act hasn't been very successful in curbing the rampant issue of dowry in India.

¹³ "System of Dowry" available at <http://www.mkgandhi-sarvodaya.org/>

¹⁴ National Crime Records Bureau, *Crime in India 2015: Compendium*, available at <http://nrb.nic.in/StatPublications/CII/CII2015/FILES/Compendium-15.11.16.pdf> (viewed on 11-03-2019)

¹⁵ Ibid.

¹⁶ S. 3, Dowry Prohibition Act, 1961.

¹⁷ S. 4, Dowry Prohibition Act, 1961.

2. Indian Penal Code, 1860 - Till 1983, the Indian Penal Code did not contain a particular arrangement to manage cruelty and violence against women inside their marital home and similar related offenses. The guilty spouse and in-laws could be arraigned under the general arrangements of Indian Penal code identifying with murder, attempt to murder, abetment to suicide, causing hurt, assault, outraging the modesty of a woman, use of criminal force and so on.

The Criminal law Amendment Act, 1983 introduced two important provisions related to dowry – **Sections 304-B and 498-A**.

- (i) The Indian Penal Code, 1860 explains what dowry death is and penalises it under Section 304-B. This section was introduced in the code in 1986. The section defines “dowry death” as—

“304-B. Dowry death.—Where the death of a woman is caused by any burns or bodily injury or occurs otherwise than under normal circumstances within seven years of her marriage and it is shown that soon before her death she was subjected to cruelty or harassment by her husband or any relative of her husband for, or in connection with, any demand for dowry, such death shall be called “dowry death”, and such husband or relative shall be deemed to have caused her death.”

This section makes the offence punishable with imprisonment for a term which shall not be less than seven years but which may extend to imprisonment for life.

In *Pawan Kumar v. State of Haryana*,¹⁸ the Hon’ble Supreme Court has laid down that the essential ingredients to attract Section 304-B IPC are:

1. “death of a woman is either by burns or by bodily injury or otherwise than under normal circumstances;
2. it should be within seven years of marriage;
3. it should also be shown that soon before her death she was subjected to cruelty or harassment by husband or any relative of husband;
4. such harassment or cruelty should pertain to demand for dowry.”

Hence, as we can see, one of the main features of this section is that the death of the woman must have been in circumstances that are not normal.

In *Kamesh Panjiyar v. State of Bihar*¹⁹, the Court gave a very generic measurement to this. In this case the dead body of the woman was found by her sibling, lying in the veranda of the litigant’s home with blood overflowing from her mouth and apparent characteristics of strangulation on her neck. It gave the idea that the deceased had been killed by strangulation the night earlier. The Court depended on the analysis of the specialist, the confirmations recuperated and the declaration of the observers to hold that

¹⁸ *Pawan Kumar v. State of Haryana*, (1998) 3 SCC 309

¹⁹ *Kamesh Panjiyar v. State of Bihar* (2005) 2 SCC 388

the demise of the woman had been caused under typical conditions as communicated in Section 304-B, and subsequently it was tried as an instance of "dowry death".

Reading this section with section 113-B of the Indian Evidence Act, 1872, has aided in the conviction of many perpetrators whom the Dowry Prohibition Act, 1961 had failed to convict earlier.

(ii) Chapter XX-A titled 'cruelty by husband or relatives of husband' of the IPC consists of just one section i.e. Section 498-A which makes the husband or his relatives punishable by imprisonment of 3 years along with fine for subjecting the wife to cruelty and harassment.

Section 304-B of the Penal Code and Section 113-B of the Evidence Act assume that the sole cause of dowry death/ suicide is cruelty as seen in Section 498-A.

In *Arun Vyas v. Anita Vyas*²⁰ the Court called cruelty under Section 498-A a continuing offence giving the woman a new point of limitation every time she is subjected to it.

3. Sections 113-A and 113-B of the Indian Evidence Act 1872 – According to Section 113-A of the Indian Evidence Act, 1872 when a woman has committed suicide and the question is whether it has been abetted by her husband or any relative of his and it's established that the suicide happened within a duration of seven years from the date of her marriage and her husband or such relative of his had subjected her to cruelty, the court may presume, having regard to all the different situations of the case, that such suicide must have been abetted by her husband or by such relative of the husband. In *Pinakin Mahipatray Rawal v. State of Gujarat*²¹, (2013) 10 SCC 48 the Court reiterated that as per Section 113-A if a woman commits suicide within 7 years of marriage and there is evidence that her husband or his relatives subjected her to cruelty as defined under Section 498-A of the Indian Penal Code, the Court may presume that her husband and his family have abetted the suicide.

According to Section 113-B of the Indian Evidence Act, 1872 where a person is accused of having committed the dowry death of a woman and it is established that soon before her passing, such woman had been oppressed by such individual and subjected to cruelty and harassment, or in association with dowry demand, the court will assume that such individual had caused the death. It was illuminated by the Supreme Court in *State of Punjab v. Iqbal Singh*²² that by introducing section 113-B in the Indian Evidence Act, the lawmakers have endeavoured to fortify the arraignment's hands by allowing an assumption to be raised if certain facts are established and the appalling instance has occurred within 7 years of marriage.

²⁰ *Arun Vyas v. Anita Vyas* (1999) 4 SCC 690

²¹ *Pinakin Mahipatray Rawal v. State of Gujarat* (2013) 10 SCC 48

²² *State of Punjab v. Iqbal Singh*, AIR 2013 SC 1484

4. Sections 176(1) and 174(3) of the Code of Criminal Procedure, 1973

Section 176(1) empowers the nearest Magistrate to hold inquests into the cause of death. Section 174(3) on the other hand says that “when-

- (i) the case involves suicide by a woman within seven years of her marriage; or
- (ii) the case relates to the death of a woman within seven years of her marriage in any circumstances raising a reasonable suspicion that some other person committed an offence in relation to such woman; or
- (iii) the case relates to the death of a woman within seven years of her marriage and any relative of the woman has made a request in this behalf; or
- (iv) there is any doubt regarding the cause of death; or
- (v) the police officer for any other reason considers it expedient so to do, he shall, subject to such rules as the State Government may prescribe in this behalf, forward the body, with a view to its being examined, to the nearest Civil Surgeon, or other qualified medical man appointed in this behalf by the State Government, if the state of the weather and the distance admit of its being so forwarded without risk of such putrefaction on the road as would render such examination useless.

However, even though we have these laws in place, and special efforts have been put in to protect women against a heinous crime such as dowry death, new cases continue to appear. What is even shocking is that the offence is not just prevalent in the uneducated strata of the society, but educated people engage in it as well.

ANALYSING REASONS FOR THE FAILURE OF DOWRY DEATH RELATED LAWS

We can understand the why have dowry death related laws failed so far in abolishing this ghastly crime under the following headings :

A. The mindset of people – It is simply shocking how despite having several legislations prohibiting the giving and receiving of dowry, people still indulge in practice. The mindset of people is just the same as it was in the past couple of decades. Parents believe that their sons are a trophy that can only be won by a girl whose family is willing to pay the right price for it. Females are still looked at as a burden on their families and are often deprived of opportunities.

In earlier times, women were uneducated and therefore, dowry was the only way their parents could ensure that their daughter had some finances to rely on. Since she would be leaving her parents' house and going to her conjugal home where she didn't own anything, dowry would not just make her feel more confident but would also provide her with a certain sense of comfort. It would make her in-laws and husband look at her as an equivalent, thus making dowry a sort of an investment that parents made in their daughter's wedding. However, things are very different today.

Women are becoming increasingly independent being employed with proper incomes. They are no longer people who need to be fended for and very well capable of taking care of themselves. They enter a new relationship as equals and often live with their future partners away from either of their parents after marriage, but the mindset has still somehow not changed. Suppressing women is something that patriarchal societies around the world have more often than not indulged in and it continues to haunt Indian women.

- B. Failure of draconian laws²³ - According to the Dowry Prohibition Act (enacted in 1961 and revised 3 times in the 1980's), dowry is characterized as any property or important security given or consented to be given either legitimately or otherwise by one party to a marriage to the other party or by their guardians or to some other individual at or before [or any other time after the marriage] for the purpose of marriage. According to this law dowry is prohibited yet gifts are permitted. This is one of the main reasons why people get away with giving and taking dowry as they claim the items received as dowry to be mere gifts. No one can ever be sure whether an expensive property given to a groom by the bride's parents was dowry or merely a gift. Over time, people who ask for dowry have also become smarter and often ask parents of the bride to give jewellery and money to her only to take them from her when she goes to live with them.
- C. Sociological, psychological and socio-economic factors : It has been seen that the system of asking for dowry is greater in joint families as a lot of people believe that their influence and guidance on the bride's future child is worth all the money in the world. The belief that the bride shouldn't go empty handed to her new home is often the driving force behind parents offering dowry to the other family. Male chauvinism is something that even women promote and thus, the barbaric practice of demanding dowry continues to spread its limbs in our society.
One of the most critical factors behind the continuing existence of dowry death is the psychological and social conditioning of women. They are taught to listen to their husbands and in-laws and adjust with them. Women are since a very young age trained to be a good wife and daughter-in-law even if that means feeling suffocated or abused. This is often the primary reason why women despite being mistreated and subjected to constant abuse in relation to dowry demands rarely complain against their matrimonial family. To avoid any judgement from the society, they keep suffering quietly, which gives the perpetrators more courage to keep disparaging their rights.

²³ Madhu Purnima Kishwar, *Strategies for Combating the Culture of Dowry and Domestic Violence in India*, UN Division for the Advancement of Women, Vienna, 2005, p. 11

CONCLUSION : NEED FOR MORE STRINGENT LAWS

Today, women are at risk not just because of our outdated traditions and mentalities but also due to the deficits in our government and judiciary. They often fail to take cognizance of the seriousness of situation at hand, which is why the penalties imposed are too inadequate and dowry death continues to thrive in our society. It is absolutely imperative to take the following steps to protect and safeguard our women:

- a) Employing more rigorous sanctions : A minimum conviction of seven years is too small for an offence as heinous as dowry death. This offence is a massive violation of women's rights and therefore, must be treated with a lot more seriousness. Those who commit this crime should not just be sent to jail for a long time but must also be ordered to pay a large sum of compensation to the woman's family. In a country dominated by patriarchal norms, the legislation needs to be even more women oriented. It is only when the sanction is greater, we will be able to curb dowry death.²⁴ The Dowry Prohibition Act, 1961 is also in dire need of amelioration. Firstly, the punishment for demanding dowry is either just imprisonment of more than 6 months and less than 2 years or a penalty of Rs.10,000. Considering how dowry is the main cause of cruelty and violence against women, it should be punished more severely. Also, the act doesn't apply to Jammu and Kashmir and the Muslim population of the country which means that cases of dowry death amongst them often go unchecked.
- b) An Agenda for Action: An administrative apparatus to deal dowry related complaints immediately. It is necessary that the government focuses on running advertisements on the television, radio and in newspapers, reprimanding the practice of dowry. In this way awareness regarding dowry related offences and the heinous act of dowry death can be spread in public and sanctions against them can be made clear. A blend of social developments and state intercessions would make the ideal recipe to constraint the violations of women's rights.²⁵
- c) Positive Demands from the Government²⁶ : If women are empowered from the day they were born via education, positive learnings, employment opportunities as well as unfettered social conditioning, they will feel confident in their own capabilities and will be able to protect themselves from such barbaric practices. An initiative in which the government opens up a bank account for every girl child assigning a small amount to it for her well being can be a move that can go very far. Also including modules at schools focusing on women welfare and empowerment can be a constructive step towards shaping the minds of youngsters. Enterprises started by ladies should be supported by the government and loans should be available to them at no interest.

²⁴ "How to Prevent Dowry in India?" <http://www.yourarticlerepository.com/society/dowry/how-to-prevent-dowry-in-india-6-suggestions/47643>

²⁵ Madhu Purnima Kishwar, op. cit., p. 35

²⁶ Madhu Purnima Kishwar, op. cit., p. 36

Village panchayats should be rewarded for ensuring that all the girls in their jurisdiction are educated.

- d) Supporting inter-caste and inter-state marriages : This would first and foremost provide a greater freedom of choice to prospective brides and grooms. Thus, finding the right person would have a much greater likelihood for them. Also, it has been often seen that inter-caste marriages involve an even greater amount of dowry for parties involved consider it a price for accepting the couple. The parents of the woman often bow down before the boy's family afraid that the wedding may be cancelled by them if they don't do as they ask.
- e) Immediate action by police²⁷: It is critical for the police to take immediate action so that the people guilty of dowry death and other dowry related offences can be made liable for their crimes. Dowry death is an offence that most people get away easily because the body is generally set ablaze by the offenders. This means that no piece of evidence is left behind by the offenders. The police must immediately go and examine the crime scene in order to make sure that they can get hold of any piece of evidence and not give the guilty parties an opportunity to clear up the evidence. The police cannot take complaints related to dowry casually. These complaints need immediate attention if we aim to have a nation that is free from this regressive and derogatory system.

The enormous test before us now lies in fortifying these approaches and revitalizing our regressive society. Women's rights are equal to human rights. Women are entitled to the same dignity and integrity as men. It is high time that we tackle this evil of the society and make women empowerment a national movement.

²⁷ Angela K. Carlson-Whitey, Comment, *Dowry Death: A Violation of the Right to Life Under Article Six of the International Covenant on Civil and Political Rights*, 17 PUGET SOUND L. Rev. 637, 639 n.11 (1994).