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# CHINTHADA ANAND V. STATE OF ANDHRA PRADESH AND ORS.: A CRITICAL LEGAL ANALYSIS OF CONSTITUTIONAL RIGHTS, CRIMINAL PROCEDURE, AND JUDICIAL INTERPRETATION

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## I. ABSTRACT

*The decision in Chinthada Anand v. State of Andhra Pradesh and Ors. constitutes a significant reaffirmation of the constitutional framework governing Scheduled Caste (SC) identity in India, particularly in the context of religious conversion. The case addresses the legal question of whether protections under the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 remain available to an individual born into a Scheduled Caste who subsequently converts to Christianity. The appellant, originally belonging to a recognised Scheduled Caste community, alleged caste-based abuse and invoked the provisions of the SC/ST Act. However, evidentiary findings established that he had converted to Christianity and was functioning as a pastor. The central legal issue therefore concerned the continued applicability of Scheduled Caste status and the associated statutory protections following such conversion. The Supreme Court held that the Constitution (Scheduled Castes) Order, 1950 restricts Scheduled Caste status to individuals professing Hinduism, Sikhism, or Buddhism. Consequently, conversion to Christianity results in the cessation of such status, rendering the protections under the SC/ST Act inapplicable. The Court further clarified that constitutional provisions and statutory mandates prevail over administrative instruments such as caste certificates. The judgment reinforces established precedents, including Punjabrao v. D.P. Meshram, wherein the term “professes” under Clause 3 of the 1950 Order was judicially interpreted. It reiterates that restoration of caste status is contingent upon reconversion and acceptance by the community. The decision gains further contemporary relevance in light of the ongoing deliberations of the Balakrishnan Commission on extending*

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*Scheduled Caste status to converted individuals. While the ruling enhances doctrinal clarity and curtails misuse, it simultaneously raises important concerns regarding the continued social vulnerability of converted individuals who may still experience caste-based discrimination in practice.*

## II. KEYWORDS

Scheduled Caste Status, Religious Conversion, Constitution (Scheduled Castes) Order 1950, SC/ST (Prevention of Atrocities) Act 1989, Article 341.

## III. FIRST - HAND INFORMATION

**Citation:** 2026 INSC 283

**Case Number:** Criminal Appeal No. 1580 of 2026

**Court:** Supreme Court of India

**Date of Decision:** 24 March 2026

**Bench:** Justice Prashant Kumar Mishra & Justice Manmohan

## IV. INTRODUCTION

The case of *Chinthada Anand v. State of Andhra Pradesh*, decided in 2026, constitutes a significant judicial pronouncement addressing the intersection of religious conversion and Scheduled Caste identity. The judgment examines the scope of protections under the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989 within the constitutional framework governing caste status.

The Supreme Court reaffirmed that Scheduled Caste status is not determined solely by birth but is also contingent upon the profession of religions recognised under the Constitution (Scheduled Castes) Order, 1950. The judgment clarifies that such status is constitutionally linked to adherence to Hinduism, Sikhism, or Buddhism, thereby reinforcing the doctrinal significance of the “profession test” in determining eligibility.

### A. Implications are reached by this decision in

The implications of this decision extend across multiple domains of constitutional law. It has a direct bearing on the interpretation of Article 341, particularly in reaffirming

the primacy of Presidential Orders in determining Scheduled Caste status. The judgment also contributes to reservation jurisprudence by clarifying the limits of affirmative action benefits in cases involving religious conversion. Furthermore, it significantly impacts the applicability of the SC/ST (Prevention of Atrocities) Act, 1989, while simultaneously informing broader debates concerning identity, religion, and the persistence of caste-based discrimination in contemporary society.

## **V. FACT AND BACKGROUND OF THE CASE**

1. Chinthada Anand is the person bringing this case to Court. He lives at Kothapalem Village, Pittalavanipalem Mandal, Guntur District, and says he is a member of the Madiga Community who is considered to be part of the Scheduled Castes. For ten years, Chinthada Anand has been a practicing Christian and has continued to serve as a pastor while practicing and following the principles and traditions of Christianity every day.
2. The petitioner asserts that various harassing and threatening calls have been made to him by unidentified persons in the year Of 2020 and that he has encountered a multitude of harassment and abuse due to his caste and received threatening phone calls regarding harmful consequences.
3. On January 3, 2021, at the home of Doma Koti Reddy, it is claimed by the petitioner that a prayer meeting was being organized by him in the afternoon when he was attacked by an individual who assaulted (hit and punched) and also verbally abused him by having his caste specifically named and being prevented from organizing further prayer meetings. It is also stated by the petitioner that revenge was not sought by him or any other harmful action taken against the assailant.
4. There was another event that took place after the pastor finished their prayer meeting on Sunday. This event occurred when the pastor returned home. Respondents 2 through 7 and 25 other respondents confined the pastor illegally and entered a small village. One of the Respondents, Respondent #9, took away the pastor's cell phone and vehicle keys, pulled the pastor by the shirt, hitting them with their fists, cursing at them about their caste, and threatened to kill

the pastor and his family members, as well as kidnapping his children/sons/daughters. The pastor stated that all of this happened on January 24, 2021.

5. And then, after, the pastor goes to Chandole Police Station. and file a complaint which was in written FIR No. of 2021, which was registered on 26.01.2021 for section 3(1)(r), 3(1)(s), 3(2) (va) of the SC/ST Act, whose offenses are punishable in the eyes of the law, and also “section 34 of IPC”.
6. The high court pointed out that according to testimonies of witnesses, they did not comply with the statement of the pastor, where he asserted that the incident was done by a large group of the accused person, and the medical reports proved that the pastor was suffering from only a simple injury; no serious injury was found. The high court also noted that if we are continuing any judicial proceeding against the respondents nos. 2-7, it is a misuse of the process of law.

## **VI. LEGAL ISSUES INVOLVED IN THE CASE**

1. Whether a person who professes Christianity can be deemed a member of a Scheduled Caste under Clause 3 of the Constitution (Scheduled Castes) Order, 1950.
2. Whether such a person can invoke the SC/ST (Prevention of Atrocities) Act, 1989; and
3. Whether a State Government's executive order (G.O. Ms. No. 341) can override a Presidential Order issued under Article 341. Arguments by Petitioner.

## **VII. ARGUMENTS BY PETITIONER**

1. Counsel of petitioner argues that High court erroneously cancelled judicially proceeding against the accused person in this case and High court does not understand the petitioner suffered from physical violence and also caste discrimination.
2. Additionally. He argued that the High Court gave a wrong judgment by stating that those who change their religion to Christianity cannot benefit from their

caste. and he also submitted the “G.O. Ms. No. 341” dated 30.08.1977, which was given by Andhra Pradesh government, where it was clearly mentioned that the if any person converted their religion, even though they were eligible to get the benefit of caste.

## VIII. ARGUMENTS BY RESPONDENT

1. Counsel of the respondent points out that the petitioner is a pastor, and he has been performing Sunday prayer meetings for more than 10 years. So, SC/ST defense is given only to those persons who come under “Article 366 (24) & (25) of the Indian Constitution”.
2. He also argues that people following religions other than Hinduism, Sikhism, or Buddhism do not receive the benefits or protections of the scheduled caste status granted under the clause. (3) of the “Constitution's Scheduled Castes Order, 1950”.
3. Additionally, he argues that to receive the defenses and benefits of the SC/ST, one must be a genuine and authentic member of the SC/ST. So, there is no error in the High Court judgment.
4. And he also argues that there is no evidence that the petitioner's reformation of Hinduism or showing the caste documentation overrules. that petitioners are practicing Christianity.
5. And counsel of the petitioner is also pointing out that the counsel of the petitioner is present “G.O.Ms. No.341” The state is barred from altering the scheduled caste list under article 341 of the Indian Constitution Act, as stated in “G.O.Ms. No. 341”.
6. Clause 3 of the “Constitution (Scheduled Castes) Order, 1950”, is straightforward. and clause 2: special coatings that if any person practices other than Hinduism, Sikhism, or Buddhism, then they are excluded from membership in the schedule caste. so, the petitioner practicing Christianity, so the petitioner does not come under the schedule caste.

## IX. ANALYSIS OF LAW

The most important question in the law is whether someone belongs to a scheduled caste or a scheduled tribe. Clause 3 of the [Constitution (Scheduled Castes) Order, 1950] clearly states that only Hinduism is included in the scheduled caste and scheduled tribe. The 1950 order was amended in 1956 to include Sikhism. In 1990, Buddhism was also included. There is no Christianity.

This clause also explains that if any person professes and practices any religion other than Hinduism, Sikhism, or Buddhism they cannot member of schedule caste.

Clause 2 is Government are considering as “non-statutory concessions” the scheduled caste can convert into Christianity and Buddhism.

Under the Constitution (Scheduled Castes) Order, 1950, Scheduled Castes are entitled to reservations in education, public employment, and statutory protections. A person belonging to a Scheduled Caste who converts to a religion other than Hinduism, Sikhism, or Buddhism such as Christianity ceases to be eligible for such benefits and protections. Following the 1990 amendment, Buddhism has been expressly included within the ambit of the Order, and therefore conversion to Buddhism does not result in the loss of Scheduled Caste status.

The SC/ST Act is a “Statutory Act “it is promoting the defence against the offence of atrocity, welfare, and security. And also protect the rights and class of Schedule caste and Schedule tribes.

“G.O. Ms No. 341” issued by the “State Government” is irrelevant to the central government’s laws; it's only decided by the “Central Government”.

The Seven Operative Postulates (Para 55)

The Supreme Court in *Chinthada Anand v. State of Andhra Pradesh and Ors.* (2026) crystallised the governing constitutional position through seven operative postulates that structure the interface between religion and Scheduled Caste status.

1. Scheduled Caste status is constitutionally confined to persons professing Hinduism, Sikhism, or Buddhism under the Constitution (Scheduled Castes) Order, 1950.
2. conversion to a non-recognised religion such as Christianity results in the immediate and complete cessation of Scheduled Caste status.
3. such cessation entails the inapplicability of statutory protections, including those under the SC/ST (Prevention of Atrocities) Act, 1989.
4. administrative instruments, including caste certificates or executive orders, cannot override the constitutional scheme under Article 341.
5. restoration of Scheduled Caste status upon reconversion is contingent upon fulfilment of specific conditions, namely proof of original caste status, bona fide reconversion, and acceptance by the community.
6. any attempt to simultaneously profess a non-recognised religion while claiming Scheduled Caste status constitutes a constitutionally impermissible dual claim, amounting to a fraud on the Constitution.
7. the burden of proof lies on the claimant to establish continued or restored eligibility within the constitutional framework. These postulates collectively provide a coherent doctrinal structure, which the Court applied to deny the appellant the benefit of Scheduled Caste protections.

## **X. PRECEDENT ANALYSIS**

### **A. Constitution (Scheduled Tribe) & (Scheduled Castes) Order, 1950**

“The Tribes or tribal communities, or parts of, or groups within, tribes or tribal communities, specified in Parts I to XXII of the Schedule to this Order shall, in relation to the States to which those Parts respectively relate, be deemed to be Scheduled Tribes so far as regards members thereof residents in the localities specified in relation to them respectively in those Parts of that Schedule. 3. Any reference in this Order to State or to a district or other territorial division thereof shall be construed as a reference to the State, district or other territorial division as constituted on the 1st day of May, 1976.”

There are some basis conditions where the person are consider as a member of the scheduled castes and scheduled tribes which followings are :-

1. The person is taking benefits and protection of Schedule Caste and Schedule Tribes when they fulfill all specified rules given under clause 2 of the [Constitution (Scheduled Castes) Order, 1950].
2. Person must be practicing Hinduism, Sikhism and Buddhism not other religion as per clause 3 of [Constitution (Scheduled Castes) Order, 1950]. if a schedule caste person practice other than Hinduism, Sikhism and Buddhism so, it's not remained the member of schedule caste.
3. If any person comes under clause 3 of [Constitution (Scheduled Castes) Order, 1950] so, that person does not get the benefit and protection of the schedule caste.
4. If any person converts their religion for their personal, spiritual benefit this is not get membership of schedule caste anymore.

“In light of our interpretation of the relevant provisions of the Code under Chapter XIV and the legal principles that this Court has articulated in a series of decisions concerning the exercise of extraordinary power under Article 226 or inherent powers under Section 482 of the Code, which we have extracted and reproduced above, we now present the following categories of cases as examples where legal authorities may exercise such power to prevent the abuse of court processes or to achieve the ends of justice.”

There are some Precedent Analysis:

1. Punjabrao v. D.P. Meshram (1965 AIR 1179) primarily concerned the interpretation of the term “professes” under Clause 3 of the Constitution (Scheduled Castes) Order, 1950. The Court held that “professing” a religion entails a conscious, open, and public declaration or practice of that faith. The case did not lay down principles relating to reconversion or restoration of caste status, which emerge from subsequent judicial developments and are restated in Chinthada Anand v. State of Andhra Pradesh and Ors. (2026) under paragraph 55 (postulate five).

2. *C. Selvarani v. Special Secretary-cum-District Collector and Others* (2024 INSC 900) is the authoritative Supreme Court decision relied upon in the present case. The Court affirmed that a claim to Scheduled Caste status while simultaneously professing Christianity constitutes a “fraud on the Constitution,” as it involves a misrepresentation of religious identity for the purpose of obtaining constitutional benefits. This principle was expressly applied in *Chinthada Anand v. State of Andhra Pradesh and Ors.* to reject inconsistent claims of caste status.
3. If any person lay claim to Caste Certificate the 3 conditions must be fulfilled:
  - There must be strong proof that he belongs to that caste which is acknowledged by [Constitution (Scheduled Castes) Order, 1950].
  - There has been Strong proof for re conversation to the Ancient Religion.
  - This is all acceptable by the community.

## **XI. COURTS ANALYSIS**

1. The investigation was conducted by the sub-divisional police officer of Bapatla. In this investigation, the court analyzed the fact that the pastor here suffered from a simple injury, not a serious injury. after the tehsildar investigation, the court found that the pastor belongs to Hindu-Madiga community, and the pastor asserted that he belonged to Reddy community. It is necessary to addresses the issue which related to the SC/ST Caste. in the “Indian constitution Article 341& 342” are talks about the SC& ST Caste. “Article 341-Scheduled Castes. – (1) The President may with respect to any State or Union territory, and where it is a State, after consultation with the Governor thereof, by public notification, specify the castes, races or tribes or parts of or groups within castes, races or tribes which shall for the purposes of this Constitution be deemed to be Scheduled Castes in relation to that State<sup>8</sup>[or Union territory, as the case may be.”
2. The court is also noting that the pastor conducts Christian religious services and practices “Christianity.” The pastor had been practicing Christianity for 10 years. and they follow “Christianity,” which comes under clause 3 of the

“Constitution (Scheduled Caste) Order, 1950”. The court also asserted that the petitioner belonged to the “Madiga community”, which falls under “(Serial No. 32 in Part I (Andhra Pradesh) “of the Schedule to the Constitution “(Scheduled Caste) Order, 1950.)” where the person must perform Hinduism, but the petitioner performs Christianity. “Government of Andhra Pradesh Abstract Social Welfare (PR) Department Dated: 30.08.1977 Social Welfare-Scheduled Caste Converts to Christianity and Buddhism-Non-Statutory Concession available for Scheduled Castes-Extension to Converts for Scheduled Castes to Christianity and to Buddhism-Orders Issued.”

3. The government examined the “Harijan Conference” held in April 1976 to determine if the persons belonged to the Scheduled Castes and if they practiced religions other than Hinduism, Buddhism, or Sikhism.

## **XII. JUDGMENT ANALYSIS**

### **A. Ratio Decidendi**

1. The supreme court held that if any hindu person convert into a christianity then they cannot be member of “Scheduled Caste (sc)” and this derived from the Article 341 and [Constitution (Scheduled Castes) Order, 1950].
2. And court made inapplicability of “Atrocity Act” if any hindu person covert into a Christianity.
3. Only caste certificate Not Conclusive Proof.
4. If any person reconverted in their origin religion, then they get the “Scheduled Caste” status.

### **B. Obiter Dicta**

1. The legal recognition is always governed by the constitution provisions “Article 341 and [Constitution (Scheduled Castes) Order, 1950]”.
2. The court emphasis the burden proof on that person who profess that he belongs to the Scheduled Caste (SC) and he must be proof by religious conduct, practice and profess which was defined under the Clause 3 of [Constitution (Scheduled Castes) Order, 1950].

### XIII. CONCLUSION

Where mala fide is manifestly attended with a criminal proceeding and/or where an ulterior motive for wreaking vengeance on the accused is maliciously instituted with a view to spite him due to private and personal grudge." (emphasis supplied).

The decision in *Chinthada Anand v. State of Andhra Pradesh and Ors.* (2026) constitutes a significant development in the constitutional jurisprudence governing Scheduled Caste status, particularly in its systematic articulation of the seven operative postulates in paragraph 55, which collectively codify the legal consequences of religious conversion on caste identity.

The judgment reaffirms that the determination of Scheduled Caste status is exclusively governed by the Constitution (Scheduled Castes) Order, 1950 issued under Article 341, and that executive instruments such as State Government orders, including G.O. Ms. No. 341, cannot alter or expand the scope of constitutionally recognised categories.

By reinforcing the "profession test," the Court clarifies that the relevant inquiry is not merely origin by birth but the actual and public profession of a recognised religion, thereby ensuring doctrinal consistency with earlier precedents such as *Punjabrao v. D.P. Meshram*.

The judgment also affirms the constitutional impermissibility of dual identity claims, aligning with the "fraud on the Constitution" doctrine as recognised in *C. Selvarani v. Special Secretary-cum-District Collector and Others* (2024 INSC 900), thereby preventing misuse of affirmative action protections.

The Constitution (Scheduled Castes) Order, 1950, paragraph 3, states: "No person who professes a different religion from Hinduism shall be deemed to be a member of Scheduled Caste." It was later amended to include Dalit Sikhs in 1956 and Dalit Buddhists in 1990. Critics argue this order is in direct tension with Article 15(1), which prohibits discrimination on the grounds of religion.

The judgment in *Chinthada Anand v. State of Andhra Pradesh* is doctrinally significant as it represents the first authoritative attempt by the Supreme Court to

systematically codify the legal consequences of religious conversion on Scheduled Caste status through the formulation of seven operative postulates in paragraph 55. This structured articulation transforms a previously fragmented jurisprudence into a coherent constitutional framework.

The decision has significant implications for the scope of protection under the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989, as it reinforces the principle that such statutory protections are contingent upon continued constitutional recognition of Scheduled Caste status. In doing so, it narrows the protective ambit available to Dalit Christians, raising complex questions regarding the persistence of caste-based discrimination beyond formal religious identity.

At the same time, the judgment must be situated within the broader constitutional discourse, particularly in light of the ongoing deliberations of the Balakrishnan Commission, which is examining the extension of Scheduled Caste status to individuals who have converted to non-recognised religions. This creates a normative tension between the Court's strict textual interpretation of the Constitution (Scheduled Castes) Order, 1950 and evolving socio-legal considerations concerning substantive equality.

While the ruling enhances doctrinal clarity by reaffirming the primacy of Article 341 and the "profession test," it also leaves unresolved the broader question of whether constitutional protections should be exclusively tethered to religious identity or adapted to reflect continuing social disadvantage. In this sense, Chinthada Anand case is both a consolidating and a limiting judgment clarifying the law as it stands, while simultaneously foregrounding the need for future constitutional reconsideration.

In our opinion, the High Court has correctly assessed the material before it and found that there is no merit in these allegations under sections 341, 506 and 323 of IPC read with 34 IPC based on evidence available to the prosecution. Based on the above, we have found no merit in the Appeal, and it is dismissed.

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