



* IN THE HIGH COURT OF DELHI AT NEW DELHI

% *Judgment Reserved on: 18.06.2026*
Judgment Delivered on: 19.06.2026

+ W.P.(C) 8259/2026 & CM APPL. 39036/2026

TELEGRAM FZ LLC & ANR.Petitioners

versus

UNION OF INDIA & ORS.Respondents

Advocates who appeared in this case

For the Petitioners : Mr. Dhruv Mehta, Senior Advocate along with Mr. Madhav Khosla, Mr. Abhi Udai Singh Gautam, Ms. Roshni Ojha and Mr. Keith Verghese, Advocates.

For the Respondents : Mr. Tushar Mehta, Solicitor General of India & Mr. Chetan Sharma, ASG with Mr. Ashish K. Dixit, Mr. Aman Mehta, Mr. Umar Hashmi, Mr. Amit Gupta, Ms. R.V. Prabhat, Mr. Shubham Sharma, Mr. Yash Wardhan Sharma and Mr. Naman, Advs. for R-1 & 2.
Mr. R. Venkatramani, Attorney General for India for R-1 & R-2.
Mr. Sanjay Khanna, Standing Counsel along with Ms. Pragya Bhushan, Ms. Jaya Choudhary & Mr. Saurabh Pandey, Advs. for R-3.

CORAM:
HON'BLE MR. JUSTICE TEJAS KARIA



JUDGMENT

TEJAS KARIA, J

1. This Writ Petition has been filed under Articles 226 and 227 of the Constitution of India, 1950 for quashing and setting aside of the interim order dated 16.06.2026 (“**Impugned Order**”) passed by Respondent No. 1, Union of India, through Ministry of Electronics and Information Technology (“**MeitY**”).
2. MeitY passed the Impugned Order under Section 69A of the Information of Technology Act, 2000 (“**IT Act**”) on the request made by Respondent No. 2, Ministry of Home Affairs (“**MHA**”) and Respondent No. 3, National Testing Agency (“**NTA**”).
3. After filing of the present Writ Petition, Respondent No. 1 has passed the final order dated 18.06.2026 (“**Final Order**”) confirming the directions contained in the Impugned Order (collectively “**Orders**”).

FACTUAL MATRIX

4. NTA *vide* letter dated 21.05.2026 informed MeitY of the misuse of Telegram Application (“**Telegram**”) of Petitioner No. 1, *Telegram FZ LLC*, by third-parties in respect of the National Eligibility-cum-Entrance Test (Undergraduate) 2026 (“**NEET UG, 2026**”).
5. MeitY issued a notice dated 01.06.2026 (“**Notice**”), convening a meeting on 03.06.2026 (“**Meeting**”) with the Petitioners and NTA to consider the scale and nature of the alleged misuse of Telegram by third parties in relation to NEET UG, 2026. The Petitioners, *vide* e-mail dated 01.06.2026, acknowledged receipt of the Notice issued by MeitY. Prior to the Meeting, the Petitioners submitted a detailed response dated 02.06.2026 (“**Reply**”) to the Notice, addressing the issues raised therein.



6. The Meeting was held as scheduled and was attended by the Parties. Thereafter, the Petitioners, *vide* e-mail dated 04.06.2026, addressed a post-Meeting communication summarising the discussions that had taken place during the Meeting in relation to the issues concerning NEET UG, 2026, as raised by MeitY.

7. MeitY issued a document dated 05.06.2026 recording the minutes of the Meeting (“**Minutes of Meeting**”). The Petitioners, *vide* e-mail of the same date, disputed the Minutes of Meeting as issued by MeitY and furnished their clarifications thereto.

8. Thereafter, *vide* e-mail dated 09.06.2026, MeitY shared with the Petitioners a list of URLs pertaining to Telegram channels, accounts and bots, in respect whereof complaints had been received alleging their involvement in fraud relating to the NEET UG, 2026 examination. The Petitioners, *vide* e-mail dated 05.06.2026, acknowledged receipt of the said list of URLs shared by MeitY and informed MeitY that the said URLs had been taken down.

9. On 16.06.2026, Respondent No. 1, by way of the Impugned Order, issued the following directions:

- i. Telegram and its associated URLs to be blocked across India within one hour of the receipt of the Impugned Order, till 22.06.2026;
- ii. Telegram to disable the message editing feature till 30.06.2026;
- iii. The Department of Telecommunication to instruct application stores and internet service providers to block / disable access to Telegram till 22.06.2026; and
- iv. The Designated Officer to place the matter before the Committee under Rule 7 of the Information Technology (Procedure and



Safeguards for Blocking for Access of Information by Public) Rules, 2009 (“**2009 Rules**”) for consideration and recommendation within 48 hours of issuance of the Impugned Order.

10. Aggrieved by the Impugned Order, the present Writ Petition has been instituted by the Petitioner.

11. Thereafter, the Committee of Respondent No. 1 under Rule 7 of the 2009 Rules passed the Final Order, wherein upon consideration of the material placed before it, including the Impugned Order, reports of NTA and the Indian Cybercrime Coordination Centre (“**I4C**”), and after affording a hearing to the Parties on 17.06.2026, concluded that Telegram was being repeatedly misused in connection with fraud relating to NEET UG, 2026, *inter alia*, by facilitating the circulation of misleading information concerning the said examination.

12. Respondent No. 1 further observed that, despite repeated takedown measures and engagement, unlawful channels continued to re-emerge through backup channels and bots, thereby rendering narrower measures ineffective. Having regard to the fact that the NEET UG, 2026 re-examination was scheduled to be conducted on 21.06.2026, the Committee concluded that a temporary platform-wide blocking of Telegram, along with disabling of the message-editing feature, was necessary and proportionate for protecting the integrity of the examination and maintaining public order. Accordingly, Respondent No. 1 confirmed the Impugned Order issued under Section 69A of the IT Act with immediate effect.



SUBMISSIONS ON BEHALF OF THE PETITIONERS

13. Mr. Dhruv Mehta, learned Senior Counsel for the Petitioners made the following submissions:

- 13.1. Petitioner No. 1 is a Limited Liability Company registered in the United Arab Emirates having its registered office in Dubai and is governed by the laws of the UAE. Petitioner No. 2, Major Lakshmiraj Rathore, is the Nodal Officer and Authorised Signatory of Petitioner No. 1 in India.
- 13.2. The Petitioners submitted that had extended sustained and *bona fide* cooperation to the Respondents, particularly from 20.05.2026, when the Respondents began convening meetings concerning the alleged circulation of fraudulent content relating to NEET UG, 2026.
- 13.3. *Vide* the Reply, the Petitioners informed MeitY that Telegram does not permit its services to be used for examination fraud, cheating, impersonation, or the sale or distribution of examination material. The Reply also stated that Telegram maintains an extensive content-moderation framework, comprising artificial intelligence and machine-learning tools, hash-based detection mechanisms, and human moderators who proactively review content and remove unlawful material.
- 13.4. The Reply further highlighted that users may report suspicious content through in-app reporting tools, while anti-spam systems, privacy controls, and warning labels such as “scam” and “fake” operate to prevent misuse. Strict enforcement measures, including



content removal, account restrictions, and permanent bans, were imposed upon violators relating to NEET UG, 2026.

- 13.5. However, the Impugned Order neither discloses adequate reasons for imposing a platform-wide block on Telegram, nor does it explain why such an extreme measure was necessary to address content relating to NEET UG, 2026. The Impugned Order, according to the Petitioners, failed to undertake any meaningful proportionality assessment and disregards the impact of the measure on the Petitioners as well as on more than 150 million Telegram users in India. The Impugned Order overlooks the fact that millions of students and educators use Telegram for lawful and constitutionally protected purposes, including sharing study material and educational resources for NEET preparation, thereby resulting in the restriction of legitimate content along with allegedly unlawful content.
- 13.6. In the present case, the requisite satisfaction was not that of the Secretary, but of the Committee while passing the Final Order. Reliance was placed on Rule 9(4) of the 2009 Rules, which provides that the Secretary, Department of Information Technology, is required to pass a final order after considering the recommendations of the Committee on the blocking request. It was further submitted that, where such request is rejected, the interim blocking order must be revoked and public access to the information restored.
- 13.7. After the passing of the Impugned Order, the Petitioners complied with the directions issued therein. In particular, the Petitioners



disabled 900 URLs out of the 1300 URLs communicated to them by MeitY *vide* e-mails dated 09.06.2026. However, the Impugned Order is silent on the compliance made by the Petitioner.

- 13.8. Reliance was placed on the decision in **Anuradha Bhasin v. Union of India**, (2020) 3 SCC 637, wherein the Hon'ble Supreme Court held that restrictions on fundamental rights must be proportionate and that only the least restrictive measure may be adopted while imposing such restrictions. The requirements of the doctrine of proportionality must be considered before any order restricting fundamental rights is passed. In the present case, MeitY and MHA failed to adopt less restrictive alternatives, such as directing the takedown of specific offending posts or channels, instead of blocking the application as a whole. The Petitioners had consistently complied with takedown directions and remained willing to assist the Respondents in addressing any additional violations promptly.
- 13.9. The Impugned Order erroneously concludes that the Petitioners failed to discharge their obligations under Rule 3(1)(b) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 ("**2021 Rules**"), without identifying the reasonable measures allegedly required to be undertaken. The Petitioners had adopted all reasonable and technologically feasible safeguards to curb unlawful content and had complied with their statutory obligations.
- 13.10. The Impugned Order errs in concluding that the Petitioners failed to take sufficiently effective measures to address content relating



to NEET UG, 2026, particularly since the contextual and subjective nature of such content necessarily limits the efficacy of artificial intelligence and machine-learning-based moderation mechanisms. The standard of compliance applicable to an intermediary is one of reasonable measures and due diligence. Accordingly, MeitY and MHA cannot attribute failure to the Petitioners merely on the ground that available technology has not achieved perfect results.

- 13.11. Reliance was also placed on the decision in ***Bishamber Dayal Chandra Mohan v. State of U.P.***, (1982) 1 SCC 39, wherein the Hon'ble Supreme Court held that any restriction placed upon the exercise of a fundamental right must be proportionate, reasonable, and strictly confined to what is necessary in the public interest, and must not exceed such limits as would render it arbitrary or excessive.
- 13.12. The Impugned Order is *ultra vires* Section 69A of the IT Act, insofar as it directs the blocking of the entire Telegram platform. According to the Petitioners, Section 69A of the IT Act empowers MeitY only to block access to specific “*information*” and does not confer authority to impose a blanket restriction on an entire intermediary platform.
- 13.13. The procedure prescribed under the 2009 Rules requires the Secretary, MeitY, to independently apply his mind to the facts and to the recommendations of the Designated Officer, and does not permit mechanical confirmation thereof. On this ground alone, the Impugned Order is procedurally unsustainable in law.



13.14. In view of the foregoing submissions, it was submitted that the Impugned Order and the consequential Final Order are liable to be quashed and set aside on the grounds of non-application of mind, procedural irregularity, and disproportionality of the measure adopted, namely, the blocking of the entire Telegram platform to achieve the stated objective, thereby affecting the rights of millions of users who were not alleged to have been involved in any unlawful activity sought to be curbed.

SUBMISSIONS ON BEHALF OF MEITY AND MHA

14. Mr. Tushar Mehta, learned Solicitor General of India along with Mr. Chetan Sharma, learned Additional Solicitor General of India appearing for MeitY and MHA, made the following submissions:

14.1. MeitY had received multiple complaints concerning the misuse of Telegram, the first of which was received from NTA *vide* letter dated 21.05.2026, disclosing specific instances of bots and channels allegedly linked to examination paper leaks, thereby endangering the integrity of the NEET UG, 2026 examination process involving approximately 2.2 million candidates across the country. MeitY and MHA, being conscious of the doctrine of proportionality, initially adopted a measured course by convening the Meeting, which demonstrated that actions of the Respondents were calibrated and in accordance with the principles of proportionality.

14.2. In compliance with Rule 9 of the 2009 Rules, due intimation was issued to the Petitioners within the prescribed period of 48 hours, and a personal hearing was afforded before the Committee on



17.06.2026. Thereafter, the Committee passed the Final Order, which is a detailed and reasoned order, upon due consideration of the Petitioners' submissions. In view of the passing of the Final Order, the present Petition has been rendered academic, as all contentions raised therein stood considered and adjudicated upon by the Committee in accordance with the 2009 Rules.

- 14.3. Telegram can be materially distinguishable from other intermediary platforms on account of its distinctive technical architecture, including cloud-based infrastructure, large public broadcast channels, automated bot ecosystems, concealment of user identifiers, large-volume file-sharing capabilities, and self-destructing messages, which cumulatively create an ecosystem particularly susceptible to misuse.
- 14.4. Telegram's message-editing functionality permits posts to be altered in a manner that may make content appear as though it had been published on an earlier date. In the context of examination fraud, such functionality can pose a grave threat to public order affecting a large number of students, particularly when contrasted with comparable intermediaries that incorporate a standard "edited" label as a matter of course.
- 14.5. Telegram, *vide* reply dated 17.06.2026, acknowledged the unavailability of its services in India, while also stating that it could not prevent users from bypassing blocking measures through VPNs. Telegram further stated that it was in the process of introducing a more prominent "edited" label, thereby proposing an architectural change that would require considerable time for



implementation. In these circumstances, the temporary disabling of the message-editing functionality constitute a tailored, proportionate, and event-specific precautionary measure confined to the context of examination fraud and falling well within the bounds of permissible restrictions.

- 14.6. A Telegram channel titled “*NEET Mafia*”, having approximately 18,000 subscribers, had been identified as actively disseminating material purporting to relate to NEET UG, 2026 examination leaks, advance booking arrangements, and payment collection mechanisms, thereby illustrating Telegram’s capacity to facilitate mass unlawful dissemination to thousands of users simultaneously.
- 14.7. Removal of a Telegram channel does not extinguish its subscriber base, since Telegram’s architecture permits the instantaneous creation of mirror channels to which existing subscribers may be redirected, thereby enabling unlawful activities to resume almost immediately despite takedown action.
- 14.8. NTA specifically confirmed that, despite repeated takedown actions against identified channels and accounts, the fraudulent ecosystem continued to spread through new channels, backup channels, rotated handles, and burner accounts. This pattern intensified prior to the re-conduct of NEET UG, 2026, thereby demonstrating that targeted enforcement measures had been rendered inadequate by the rapid creation of replacement infrastructure and that, in circumstances involving public order concerns, prohibition of the platform of the intermediary itself became imperative.



- 14.9. Section 2(1)(v) of the IT Act defines “*information*” expansively to include data, messages, text, images, sound, voice, codes, computer programmes, software, and databases. Such definition is not confined merely to individual messages, posts, or files, but extends to the underlying technological components through which content is generated, transmitted, received, stored, or hosted. An application or software platform, being a compilation of codes, computer programmes, databases, application programming interfaces, and communication protocols, was stated to fall within the broad definition of “*information*”.
- 14.10. The blocking power under Section 69A of the IT Act extends beyond individual pieces of content and, having regard to its wide legislative scope, encompasses the software architecture, codebase, databases, and programmatic ecosystem constituting an application. Since such an application qualifies as an aggregation of “*information*” under Section 2(1)(v) of the IT Act, the Impugned Order directing the blocking of Telegram in its entirety was consistent with the authority conferred under Section 69A of the IT Act.
- 14.11. I4C report dated 10.06.2026 documented the widespread exploitation of Telegram for unlawful activities, including cyberattacks, malware distribution, transnational cybercrime, circulation of leaked examination papers, and circulation of child sexual exploitative and abuse material, thereby establishing systemic misuse of the Telegram platform. Accordingly, the expression “any information” under Section 69A of the IT Act is



sufficiently broad to encompass all information hosted by an intermediary where the scale of harm so warrants.

- 14.12. Reliance was placed upon the decision in ***Assistant General Manager, State Bank of India & Anr. v. Tanya Energy Enterprises through its Managing Partner Shri Alluri Lakshmi Narsimha Varma***, Neutral Citation: 2025 INSC 1119, wherein the Hon'ble Supreme Court has held that a Court is not invariably bound by the grounds expressly stated in an administrative order and may, in appropriate cases, uphold such order on an alternative ground traceable to the factual narrative therein, subject to affording the affected party due notice and an opportunity to respond.
- 14.13. Reliance was also placed upon the decision in ***Akshay N. Patel v. Reserve Bank of India & Anr.***, (2022) 3 SCC 694, wherein the Hon'ble Supreme Court held that constitutional rights cannot be permitted to become instruments in the hands of private commercial entities to defeat lawful regulation enacted in public interest.
- 14.14. The doctrine of proportionality requires a careful balancing of potential private harm against public harm. In the present case, Telegram's architectural design, particularly its mass-multiplication features and date-time editing capability, rendered it structurally incapable of preventing misuse during the critical examination window. Reliance was placed upon ***Anuradha Bhasin*** (*supra*) in support of the said submission.



14.15. In view of the foregoing submissions, it was submitted that the present Petition is liable to be dismissed.

15. Mr. R. Venkatramani, learned Attorney General for India, while buttressing the submissions advanced by the learned Solicitor General of India, submitted that the Impugned Order was passed upon due application of mind and is complete in itself. It was further submitted that an entity which, by reason of its own technical architecture, is structurally incapable of ensuring accountability, cannot be permitted to invoke the doctrine of proportionality to assail lawful regulatory action. It was also submitted that a profit-driven commercial platform cannot selectively rely upon proportionality to resist legitimate preventive measures adopted by the State in public interest.

REJOINDER SUBMISSIONS ON BEHALF OF THE PETITIONERS

16. Mr. Dhurv Mehta, learned Senior Counsel for the Petitioners made the following rejoinder submissions:

- 16.1. The Government cannot, under the guise of exercising powers under Section 69A of the IT Act, resort to wholesale blocking of the internet or of an entire intermediary platform. Reliance was placed upon the decision in *Anuradha Bhasin* (*supra*) in support of the said submission.
- 16.2. Although the Short Affidavit dated 18.06.2026 filed by MeitY and MHA in the present Petition raises concerns regarding the detection of unlawful content on Telegram, such concerns are misplaced. The Petitioners do not suffer from any technological deficiency and possess the requisite capability to detect unlawful content circulated on Telegram.



16.3. The challenge in the present Petition is not confined merely to procedural lapses but extends to the absence of any platform-specific or architectural basis sufficient to justify the invocation of emergency powers against Telegram.

- i. On the procedural aspect, the Impugned Order suffers from non-application of mind, having accepted general allegations at face value without particular evidence and independent assessment of proportionality of the action taken. The Petitioners have been proactively engaging with the Respondents since 20.05.2026, demonstrating prompt compliance with takedown requests, and specifically flagged the adverse impact of such blocking on students dependent on Telegram for their NEET UG, 2026 preparations.
- ii. On the architectural aspect, the Minutes of Meeting do not accurately reflect the discussion held at the Meeting. The Petitioners' e-mail dated 05.06.2026 acknowledging the Minutes of Meeting also entail clarifications specifically clarifying that its moderation framework encompasses extensive proactive and reactive measures and that the references made during the Meeting to contextual limitations and search functionality were taken out of context and do not suggest any deficiency in Telegram's technological capability to address the issue of unlawful content.

16.4. The Petitioners maintain a zero-tolerance approach towards unlawful activity and undertake proportionate enforcement action by utilising all identifiers available within Telegram's technical



architecture. The Petitioners continuously enhance their detection and enforcement mechanisms in accordance with Telegram's technical framework and applicable legal obligations.

16.5. The Petitioners are in due compliance with Rules 3(1)(b) and 3(1)(d) of the 2021 Rules, and that such compliance negates the justification advanced by MeitY and MHA for invoking emergency powers against Telegram.

17. In view of the foregoing submissions, it is prayed that the present Petition be allowed and the Orders be set aside.

ANALYSIS AND FINDINGS

18. Heard the learned Senior Counsel for the Petitioner, learned Attorney General for India, learned Solicitor General of India and learned Additional Solicitor General of India for the Respondents.

19. Upon consideration of the rival submissions advanced on behalf of the Parties and the material placed on record, the following issues arise for determination:

- i. Whether the Impugned Order passed by Respondent No. 1 is vitiated by non-application of mind?; and
- ii. Whether the action of Respondent No. 1 in temporarily blocking public access to entire Telegram platform satisfies the requirement of proportionality?

Issue (i)

20. In respect of the present issue, the principal contention advanced on behalf of the Petitioners is that the Impugned Order suffers from non-application of mind, and that the Final Order confirming the Impugned Order cannot supply or supplement reasons that are absent from the



Impugned Order itself. According to the Petitioners, the language employed in the Impugned Order demonstrates that Respondent No. 1 merely reproduced the relevant ingredients of Section 69A of the IT Act, without undertaking an independent assessment of the material placed before it, thereby creating only an appearance of compliance with the said provision.

21. In this regard, it would be apposite to advert to the relevant portion of the Impugned Order, which is reproduced hereinbelow:

“Whereas, section 69(A) of the Information Technology Act, 2000 and Rules made thereunder empower the Central Government to issue directions for blocking for public access of any information through any computer resource, if it is satisfied that it is necessary or expedient so to do, in the interest of sovereignty and integrity of India, defence of India, security of the state, friendly relations with foreign States or public order or for preventing incitement to the commission of any cognizable offence relating to above, it may direct any agency of the Government or intermediary to block for access by the public or cause to be blocked for access by the public any information generated, transmitted, received, stored or hosted in any computer resource.

And whereas, the Designated Officer appointed under the Information Technology (Procedure and Safeguards for Blocking for Access of Information by Public) Rules, 2009 (hereinafter referred to as the Rules) has received request from designated Nodal Officer for blocking of the messaging platform intermediary Telegram and its associated URLs under the emergency provisions u/s 69A of IT Act, 2000.

And whereas, the requesting agency Ministry of Home Affairs and the NEET examination authority, NTA has brought to the notice of MeitY about the growing misuse of the intermediary Telegram in the circulation of fake examination papers, dissemination of misleading information, and other fraudulent illegal activities relating to NEET (UG) 2026. In the request, the agencies further highlighted that despite repeated takedown actions against specific channels, the fraudulent ecosystem continues to proliferate on the Telegram platform through the creation of new channels, groups, and



associated infrastructure. In view of the serious implications for the integrity of the examination process and in the interests of a large number of students appearing in the examination, the agency MHA requested that access to the intermediary "Telegram" be blocked for at least till 22nd June by which time the examination process would have concluded. A meeting with Telegram was held on 03rd June 2026 with officials of NTA and MeitY, wherein serious concerns regarding the misuse of the Telegram platform for dissemination of examination-related misinformation, circulation and selling of purported examination papers, and other fraudulent activities were brought to the notice of Telegram. Despite such engagement and repeated reporting of objectionable channels, as per the nodal officer the misuse has not abated and has even intensified before re-conduct of NEET Examination. As per the agencies, the same Telegram operators continue to circulate false claims of an impending paper release, using rotated handles pre-positioned backups and burner accounts that have rendered channel-by-channel takedown ineffective. Students continue to be defrauded, and the persistent rumour-mongering is calculated to undermine public confidence in the integrity of the re-conducted examination at its most sensitive juncture. The agencies further submitted that the reactive, entity-by-entity approach has been exhausted and that nothing short of a platform -level measure will secure the examination through the critical window and accordingly the agencies requested for the blocking of Telegram and its associated URLs under the emergency provisions of Section 69A of the Information Technology Act, 2000.

And whereas, the Designated Officer has examined the emergency requests received from Nodal Officer related to blocking of Telegram application and its associated URLs. The Designated Officer observed that NEET is conducted by NTA once in a year which is country's sovereign exercise to select the right candidates for MBBS course and there has already been an incident where some miscreants exploited Telegram platform to spread fake information and to carry out fraudulent activities. Even after discussions with the Telegram officials, the Telegram platform failed to effectively curb such activities or take any effective preventive measures on their platform which resulted in wide spread public unrest in the country. A repeat of such lack of pre-emption on the platform and continuous propagation of similar contents/activities



will again create public order situations in the country besides undermining the credibility of the public institutions like NTA. It is also highlighted that Law Enforcement Agencies from various States including Bihar, Rajasthan and Gujarat, have made several arrests and already issued advisories to general public to stay alert about the NEET paper leak scam which is being used to defraud students and their families. Further, NTA in its supplementary technical note specifically highlighted how the message editing feature with timestamp retention was exploited by the fraudulent actors to create leaked chat artifacts and mislead the NEET aspirants. A repetition of the same will again create panic among students and parents and will seriously hamper the integrity of the exam scheduled on 21st June, as also inflame the sentiments of the aspirants. To prevent any such adverse effects by spreading false and misleading information in relation to the re-conduct of the NEET UG 2026 examination, the Designated Officer after careful examination of the request along with the accompanying information and to his satisfaction, under Rule 9(1) of the Rules, has made specific recommendation to block for access by the public or cause to be blocked for access by the public any information generated, transmitted, received, stored or hosted in any computer resource by messaging platform intermediary Telegram and its associated URLs till 22nd June 2026 and to direct the messaging platform intermediary Telegram to disable the message editing feature till 30th June 2026, as there is a cogent apprehension that the referred to fraudulent illegal activities on the platform might pose serious challenges to the public order in the country.

And whereas, on communication of the recommendations of the Designated Officer and having perused the material available on file, I, Secretary, Ministry of Electronics & Information Technology have satisfied myself that the Telegram platform is misused for the dissemination of examination-related misinformation, circulation of purported examination papers, and other fraudulent illegal activities that can have serious implications on the public order in the country.

Now therefore, I hereby allow the recommendations of Designated officer as an interim measure. I hereby direct the messaging platform intermediary Telegram to be blocked for access by the public or cause to be blocked for access by the public any



information generated transmitted received, stored or hosted in any computer resource by Telegram and its associated URLs in India within 1 hour of receipt of this order till 22nd June 2026 and to disable the message editing feature till 30th June 2026 in the interest of sovereignty and integrity of India, public order and to prevent commission of any cognizable offence relating to public order. I also direct Department of Telecommunication to issue directions to ISPs and various App stores to block for access by the public or cause to be blocked for access by the public any information generated, transmitted, received, stored or hosted in any computer resource by messaging platform intermediary Telegram and its associated URLs from their platform within 1 hour of receipt of this order till 22nd June, As per Rule 16 of above stated Rules, you are instructed to strictly maintain confidentiality regarding the actions taken in pursuant to this direction, and no part of this communication should be made public. I also direct the Designated Officer to place the request before the Committee referred to in rule 7 of the Rules for its consideration and recommendation within 48 hours of issuance of this interim order.”

22. A perusal of the Impugned Order indicates that Respondent No. 1, upon consideration of the material placed before it, was satisfied that Telegram was being misused for dissemination of examination-related misinformation, circulation of purported examination papers, and other fraudulent and unlawful activities, which were likely to have serious implications for public order in the country. Upon recording such satisfaction, Respondent No. 1 directed that public access to Telegram be blocked until 22.06.2026 and that the message-editing feature be disabled until 30.06.2026, with a view to prevent the commission of cognizable offences relating to public order.

23. There is no cavil that every decision of a statutory or administrative authority must be supported by reasons, which constitute an essential facet of the principles of natural justice. Reasons serve to establish the nexus



between the material placed before the authority and the conclusion arrived at by it and further demonstrate that the authority has applied its mind to the relevant facts and circumstances.

24. In the present case, the Impugned Order discloses that temporary blocking of the public access to Telegram is directed having regard to the potential grave implications for public order in the country and for preventing the commission of cognizable offences arising from the circulation of examination-related misinformation and purported examination papers on Telegram, particularly in light of prior incidents relating to NEET UG, 2026.

25. Thus, this Court is of the view that given the emergency nature of the Impugned Order, the reasons supplied in arriving at the decision were sufficient. As Respondent No. 1 has strictly followed the procedural steps as required under Section 69A of the IT Act, the challenge to the Impugned Order on the ground non-communication of reasons cannot be sustained. Accordingly, the objections founded on alleged non-application of mind and inadequacy of opportunity of hearing also fail given the statutory scheme of Section 69A of the IT Act and 2009 Rules. In view of the foregoing, this Court is of the considered opinion that the Impugned Order contains reasons and there exists a direct and substantial nexus between the direction issued and the reasons assigned.

26. Further, an opportunity of hearing was afforded to the Petitioners immediately after the passing of the Impugned Order in terms of 2009 Rules. The Final Order was, thereafter, passed upon due consideration of the submissions advanced by the Petitioners before the Committee, recording detailed reasons in support of the continued blocking of public access to



Telegram. The relevant portion of the Final Order is reproduced hereinbelow:

“1. Background

These proceedings arise from the Interim Direction dated 16th June 2026 issued under Rule 9 of the Blocking Rules, in view of the imminent conduct of the NEET (UG) 2026 re-examination scheduled for 21st June 2026.

The Interim Direction was based on material received from the National Testing Agency (NTA), the Indian Cybercrime Coordination Centre (I4C), and other competent agencies, which collectively established the continuing misuse of the Telegram platform in connection with examination-related fraud. NTA communicated, through successive letters, that channels were operating openly on the platform under names that themselves advertised their unlawful purpose — including "PAPER LEAKED NEET", "Re-NEET 2026", "Private Mafia", and "REE NEET MAFIAA" — and were demanding sums ranging from a few thousand to several lakhs of rupees from candidates and their families in exchange for purported access to re-examination material.

I4C additionally reported that Telegram was being utilised for a range of other unlawful activities, including child sexual exploitation and abuse material (CSEAM), deepfake content, digital arrest fraud, command-and-control malware deployment, and sextortion. The record establishes that I4C pursued consultations and sought corrective measures from the platform on at least 35 separate occasions since October 2024.

2. Supporting Documents Considered

The Committee has considered the following material:

- (i) NTA communications dated 21st May 2026 and 15th June 2026;*
- (ii) Telegram’s written responses and submissions;*
- (iii) Minutes of the meeting held at MeitY on 3rd June 2026;*



(iv) Recommendations of I4C/MHA dated 15th June 2026;

(v) The Interim Direction dated 16th June 2026; and

(vi) Oral submissions made before the Committee under Rule 7 on 17th June 2026.

3. Contentions Raised by Telegram

Telegram submitted that it operates extensive content moderation systems, including AI/ML-assisted detection tools, human moderation, user reporting mechanisms, and enforcement procedures, and that it had acted upon reported entities and maintained cooperation with Indian authorities. Telegram further contended that:

(a) Invocation of Rule 9 was unwarranted, given that engagement had been ongoing for several weeks;

(b) A platform-wide block was disproportionate, and that specific channels, groups, or accounts ought to have been targeted instead;

(c) Telegram had already implemented proactive compliance measures; and

(d) Section 69A does not authorise the blocking of a platform in its entirety.

4. Findings on Invocation of Rule 9

Telegram has been fully heard. All material has been duly perused; the Committee has bestowed its due consideration on the contentions raised and the material on record. The Committee does not accept the contention that prior engagement necessarily negates the existence of an emergency. The record demonstrates that Government authorities pursued consultations and sought corrective measures at least 35 times since October 2024 on various misuses of the platform. However, the fresh material including reports by the NTA and the Indian Cybercrime Coordination Centre (I4C), Ministry of Home Affairs, received immediately prior to the examination to be held on 21.06.2026, revealed the continuing and startling emergence of unlawful entities, reserve channels, audience



migration structures and fraudulent activity despite prior interventions.

The emergency arose not from first discovery of the issue, but from the escalation and persistence of the identified threat in the immediate run-up to the examination. In the Committee's view, waiting for completion of the ordinary process would have materially undermined the objective of preserving the integrity of the examination process. Any non-action by the government would have necessarily led to compromising the sanctity and integrity of the examination process. More so, as this was the re-examination of NEET. Therefore, the Committee could not be unmindful of the paramount interests of the 22 lakh candidates and their families and the resultant chaos and the potential disruption of public order. The Committee also took serious note of the fact that unscrupulous entities were riding on the platform with barcodes to elicit illegal payments from students across the length and breadth of India. This pattern of money-making and exploitative conduct employed by the exam mafia/syndicates on this platform cannot be countenanced.

5. Findings on Necessity and Adequacy of Alternatives

The Committee carefully examined whether less restrictive alternatives existed which could adequately address the identified harm. Entity-specific interventions, including reporting and removal of channels, groups, bots and accounts, were repeatedly found ineffective and inadequate. The record nevertheless demonstrates the recurring reappearance of offending entities through mirror channels, backup channels, reserve channels and successor entities.

The platform has clearly failed in its statutory obligation and its purported compliances are inadequate and ineffective. There is repeated emergence and re-emergence of user accounts, backup channels, bots and auto-rotated handles, all of which successfully dodged all takedowns and bypassed all directives.

Committee observed that due to the platform's complex, proprietary technical architecture and the highly dynamic, high-volume nature of user-generated data, the real-time segregation of legitimate communications from illicit content is practically unfeasible. Because granular filtration is technically impossible at this scale, and with critical exam timelines immediately approaching, a



comprehensive block on the platform remains the only viable mechanism of last resort to eliminate systemic risk and prevent widespread institutional compromise which was agreed by the committee.

The evidence further demonstrates that audience migration mechanisms enabled operators to rapidly reconstitute networks following enforcement actions. Accordingly, the Committee concludes that channel-specific measures had not proved capable of providing an effective and timely remedy in the prevailing circumstances when re-examination of NEET(UG) is scheduled on 21st June, 2026.

6. Findings on Platform Characteristics

The Committee notes that certain features of the Telegram platform assumed particular relevance in the factual circumstances of this case: specifically, its large public channels, extensive file-sharing capabilities, automated bot functionality, username-based operation, reserve-channel structures, and rapid audience migration capabilities.

The Committee does not regard these features as unlawful in themselves. However, the material before it establishes that these features were actively and systematically utilised by the identified network to evade enforcement measures and to sustain unlawful activity during the critical pre-examination period.

7. Findings on Proportionality

The Committee does not proceed on the assumption that all content on Telegram is unlawful. The measure is grounded in the demonstrated inability of narrower interventions to effectively mitigate the identified risk within the available time. The restriction was temporary, event-linked, and limited in duration.

The Committee finds that the measure bears a rational nexus to the objectives sought to be achieved — namely, the protection of examination integrity, the prevention of fraud, and the preservation of public confidence in the examination process. The measure is accordingly held to satisfy the requirement of proportionality.



8. Jurisdiction Under Section 69A

The present case clearly falls within the ambit of public order and for preventing incitement to the commission of any cognizable offence relating to public order, which falls under one of the clauses of Section 69A.

Telegram functions as an intermediary operating through software applications, databases, servers, and network infrastructure constituting “computer resources” within the meaning of the Information Technology Act, 2000. Information generated, transmitted, received, stored, or hosted through such resources falls within the scope of Section 69A.

The Committee is satisfied that the present action is directed not against Telegram merely by reason of its status as an intermediary, but because the material on record establishes that access to the relevant computer resource was being repeatedly and systematically exploited for the identified unlawful activities, and that less restrictive measures had proved inadequate.

9. Message Editing Functionality

The Committee has separately considered the material placed on record by NTA regarding the platform's message-editing functionality. This material indicated a risk that historical posts and associated content could be modified after the fact in a manner capable of facilitating fraudulent claims regarding the prior publication of examination-related material.

Telegram acknowledged in its reply dated 17th June 2026 that Telegram's services are not available to users in India. However, Telegram cannot prevent users from deploying external measures (such as VPNs) to circumvent blocking measures and Telegram is in the process of making the "edited" label more prominent to prevent backdating, and that, being an architectural change, implementation would take some time. In the specific context of examination fraud allegations, the temporary disabling of this functionality was considered a narrowly tailored and precautionary measure, and the Committee so finds.



10. Public Order Grounds

The Rajasthan Police Special Operations Group, in its investigation into the events surrounding the cancelled examination of 3rd May 2026, has reported the recovery of fraudulent examination material and documented Telegram-based circulation networks.

The Ahmedabad City Cyber Crime Branch, on the eve of the Interim Direction, arrested members of an inter-State cyber-fraud gang operating eight Telegram channels pursuant to the same modus operandi. Documented transactions of approximately ₹1.5 crore were routed through fraudulent bank accounts, and approximately one thousand mobile numbers were contacted within a single month. The arrests followed registration of C.R. No. 111910672600892/2026 at the Cyber Crime Police Station, Ahmedabad, under Sections 318(4), 319(2), and 54 of the Bharatiya Nyaya Sanhita read with Section 66D of the Information Technology Act.

Beyond financial fraud, the operators required candidates to transmit their previous NEET admit cards and active WhatsApp numbers as a precondition to receiving any purported "proof," thereby converting the operation from a financial fraud into a personal data exfiltration scheme targeting examination candidates.

Taken together, this material establishes that the misuse of the Telegram platform in connection with the NEET (UG) 2026 examination is not a single-agency concern. It constitutes a documented, multi-State law enforcement concern of public-order character.

11. Acknowledgment by the Platform's Chief Executive

11.1 Public Admission of Scale and Nature of Misuse

On 16th June 2026, Mr. Pavel Durov, Chief Executive Officer of Telegram, posted publicly on the platform X (formerly Twitter), under his verified handle @durov: "Over the past few weeks, we removed hundreds of channels sharing leaked exam materials and related scams in India. We're also making the 'edited' label more visible to prevent backdating scams. Telegram is a force for good. Banning it — even temporarily — is a mistake."



This admission directly corroborates the scale and organised character of the misuse documented in NTA's successive references. It also confirms the submission made by NTA at paragraph 4(ii) of its reference of 21st May 2026 — that the platform's posture in respect of offending channels was reactive, after-the-fact removal, rather than preventive screening. The platform's own account is one of removing channels that ought never to have been permitted to proliferate in the first instance.

11.2 Use of the Terminology “Backdating Scams”

Mr. Durov employs the term “backdating scams” of his own accord. He does not dispute the existence of such scams, characterise the underlying concern as fabricated or overstated, or offer any alternative account of the phenomenon. The category specifically addressed by the Interim Direction — the post-event fabrication of pre-examination chat artefacts through the message-editing feature — is therefore the very category that Telegram's own Chief Executive publicly acknowledges.

11.3 Concession that Existing Safeguards Are Inadequate

Mr. Durov's statement that Telegram is “making the ‘edited’ label more visible to prevent backdating scams” concedes three matters of central importance to the present directions:

- (a) The “edited” label, in its existing form, lacks sufficient visibility and requires remediation;*
- (b) The inadequacy of the label has been actively exploited for backdating scams — the precise harm the directions address; and*
- (c) A unilateral product change is now being made specifically to address that harm, confirming that the existing design was a deliberate policy choice by the platform rather than than a technical necessity — as submitted by NTA at paragraph 5 of its reference of 21st May 2026 and as detailed in Annexure II to its reference of 14th June 2026.*



12. Rule 7 Committee Recommendation

The Committee convened on 17th June 2026 and heard representatives of Telegram, NTA, and the Ministry of Home Affairs. All parties reiterated their respective submissions and relied upon material already placed on record. Following detailed deliberation, the Committee unanimously recommended confirmation of the Interim Direction dated 16th June 2026.

13. Order

For the reasons recorded herein above, I, Secretary, conclude that:

- (i) Substantial material exists on record demonstrating the continuing misuse of Telegram in connection with examination fraud and associated unlawful activities;
- (ii) Less restrictive alternatives were duly considered and found inadequate in the prevailing circumstances;
- (iii) Invocation of Rule 9 was justified on the facts; and
- (iv) NEET is conducted by NTA once in a year and there has already been an incident where some miscreants exploited the Telegram platform to spread fake information and to carry fraudulent activities. Even after engagements with Telegram, the platform failed to effectively curb such activities or to take any effective preventive measures, which resulted in widespread public unrest in the country. A repeat of such lack of effective remedial measures is likely to further erode the confidence of students, which can lead to a serious public order situation in the country and may lead to undermining the credibility of public institutions like NTA. It can also end up in violence involving incitement of cognizable offences related to public order. Hereby, the qualifying cause of public order as well as incitement to cognizable offences related to public order are very much satisfied. The Interim Direction constituted a necessary, proportionate, and time-bound measure, grounded inter alia in public order.

Accordingly, in exercise of the powers conferred under Section 69A of the Information Technology Act, 2000, read with the Blocking Rules, and upon consideration of the unanimous recommendation of



the Committee constituted under Rule 7, the Interim Direction dated 16th June 2026 is hereby confirmed. All directions contained therein shall continue to operate in accordance with their terms.

This Order shall take effect immediately.”

27. A perusal of the Final Order demonstrates that Respondent No. 1 considered the relevant material on record, including, *inter alia*, the Petitioners’ written submissions and responses, as well as the recommendations of I4C / Respondent No. 2 dated 15.06.2026, for confirming the blocking of public access to Telegram. Thus, the reasons recorded by Respondent No. 1 in the Impugned Order stand further fortified by the Final Order.

28. The Petitioners’ contention that the Final Order cannot supplement or supplant the reasons recorded in the Impugned Order is misconceived. Such contention is contrary to the scheme of Section 69A of the IT Act read with the 2009 Rules, which contemplates that, in cases of emergency such as the present one, an interim blocking direction may be issued upon the satisfaction of the Secretary of Respondent No. 1, as to the existence of the conditions specified under Section 69A of the IT Act. Thereafter, a post-decisional hearing is required to be afforded to the intermediary before a final order is passed, either confirming or revoking the interim blocking direction. In such circumstances, the Petitioners’ insistence that detailed reasons ought to have been supplied in the Impugned Order itself prior to the grant of an opportunity of hearing is without merit.

29. Further, the Petitioners’ contention that Telegram had complied with directions for blocking specific content is not determinative for the purposes of assessing the validity of the directions issued under Section 69A of the IT



Act. The blocking of individual content was undertaken pursuant to the 2021 Rules, whereas the Impugned Order under Section 69A of the IT Act was passed upon consideration of the overall architectural features of Telegram, which rendered it impracticable to prevent misuse of the platform through the less restrictive measure of blocking individual items of content alone.

30. The Final Order reiterates that the interests of approximately 2.2 million candidates appearing in the NEET UG, 2026 examination were required to be protected and that any potential disruption to public order had to be averted. It is in that context that Respondent No. 1 concluded that temporary blocking of public access to Telegram was necessary for securing the aforesaid objective.

31. It is, therefore, evident that both the Impugned Order and the Final Order are founded upon relevant material duly considered by Respondent No. 1, and that the conclusions recorded therein are supported by the reasons set out in the said Orders. Accordingly, Issue (i) is answered in the negative, and it is held that the Orders do not suffer from the vice of non-application of mind, as alleged by the Petitioners.

Issue Re: (ii)

32. The present issue requires determination of whether the action of Respondent No. 1 in temporarily blocking public access to Telegram is sustainable in law. For the purposes of adjudicating the said issue, it is apposite to consider it under two distinct prongs: first, whether Respondent No. 1 was legally empowered to issue directions for blocking public access to Telegram; and secondly, if such power existed, whether the exercise thereof was disproportionate in the facts and circumstances of the present case.



33. For examining the first prong, it is necessary to refer to Section 69A and Section 2(1)(v) of the IT Act, which are reproduced hereinbelow for ease of reference:

Section 2(1)(v) of the IT Act

“2. Definitions. — (1) *In this Act, unless the context otherwise requires,—*

(v) —information includes [data, message, text,] images, sound, voice, codes, computer programmes, software and data bases or micro film or computer generated micro fiche;”

Section 69A of the IT Act

“69A. Power to issue directions for blocking for public access of any information through any computer resource.—

(1) Where the Central Government or any of its officers specially authorised by it in this behalf is satisfied that it is necessary or expedient so to do, in the interest of sovereignty and integrity of India, defence of India, security of the State, friendly relations with foreign States or public order or for preventing incitement to the commission of any cognizable offence relating to above, it may subject to the provisions of sub-section (2), for reasons to be recorded in writing, by order, direct any agency of the Government or intermediary to block for access by the public or cause to be blocked for access by the public any information generated, transmitted, received, stored or hosted in any computer resource.

(2) The procedure and safeguards subject to which such blocking for access by the public may be carried out, shall be such as may be prescribed.

(3) The intermediary who fails to comply with the direction issued under sub-section (1) shall be punished with an imprisonment for a term which may extend to seven years and also be liable to fine”

34. Section 69A of the IT Act empowers the Central Government, or any officer specially authorised by it in this behalf, to issue directions for



blocking public access to any information generated, transmitted, received, stored, or hosted in any computer resource, where it is satisfied that such action is necessary or expedient in the interest of the sovereignty and integrity of India, defence of India, security of the State, friendly relations with foreign States, public order, or for preventing incitement to the commission of any cognizable offence relating thereto. Non-compliance with directions issued under the said provision is punishable with imprisonment for a term which may extend to seven years, and also with fine.

35. The expression “*information*”, appearing in Section 69A of the IT Act, is defined under Section 2(1)(v) of the IT Act and includes, *inter alia*, images, sound, voice, codes, computer programmes, software and databases. The breadth of the said definition indicates that the expression “*information*” is required to be construed expansively. A restrictive construction, confining the expression only to individual user accounts, channels, images, posts, files or messages, would unduly narrow the scope of Section 69A and may render the provision otiose. The legislative intent, therefore, appears to be to confer a broad and technologically neutral meaning upon the expression “*information*”.

36. Further, the term “*computer resource*” is defined under Section 2(1)(k) of the IT Act to mean computer, computer system, computer network, data, computer data base or software. The expression “*computer*” used in the definition of “*computer resource*” is defined under Section 2(1)(i) of the IT Act to mean any electronic, magnetic, optical or other high-speed data processing device or system which performs logical, arithmetic, and memory functions by manipulations of electronic, magnetic or optical impulses, and includes all input, output, processing, storage, computer



software or communication facilities which are connected or related to the computer in a computer system or computer network.

37. It is the Respondents' case that, having regard to the definitions of the expressions "*information*" and "*computer resource*" as used in Section 69A of the IT Act, the said provision would encompass an application or an entire platform. An application or platform, in its ordinary and commonly understood sense, is a computer programme or software designed to perform specified functions for an end user. In view of the express inclusion of "*codes*", "*computer programmes*" and "*software*" within the definition of "*information*" under Section 2(1)(v) of the IT Act, there is no reason to exclude an application or platform from the ambit of the said expression. Further, the definitions of "*computer resource*" and "*computer*" make it evident that information generated, transmitted, received, stored, or hosted through such software-based infrastructure falls within the ambit of Section 69A of the IT Act. An application or platform performs logical, arithmetic and memory functions through electronic, magnetic or optical impulses, and includes input, output, processing, storage, computer software and communication facilities connected with a computer system or computer network. Accordingly, this Court is of the view that Respondent No. 1 was empowered under Section 69A of the IT Act to issue directions for blocking public access to Telegram.

38. The next question that arises for consideration is whether the action of Respondent No. 1 in blocking public access to Telegram can withstand scrutiny on the touchstone of proportionality, particularly where the stated object is to prevent misuse of the platform, but the measure also affects the ability of approximately 150 million Telegram users in India to access the



platform for lawful and innocuous purposes. The Petitioners contend that the said action fails to satisfy the proportionality test as enunciated by the Hon'ble Supreme Court in **Anuradha Bhasin** (*supra*), wherein it was held as under:

“78. In view of the aforesaid discussion, we may summarise the requirements of the doctrine of proportionality which must be followed by the authorities before passing any order intending on restricting fundamental rights of individuals. In the first stage itself, the possible goal of such a measure intended at imposing restrictions must be determined. It ought to be noted that such goal must be legitimate. However, before settling on the aforesaid measure, the authorities must assess the existence of any alternative mechanism in furtherance of the aforesaid goal. The appropriateness of such a measure depends on its implication upon the fundamental rights and the necessity of such measure. It is undeniable from the aforesaid holding that only the least restrictive measure can be resorted to by the State, taking into consideration the facts and circumstances. Lastly, since the order has serious implications on the fundamental rights of the affected parties, the same should be supported by sufficient material and should be amenable to judicial review.

79. The degree of restriction and the scope of the same, both territorially and temporally, must stand in relation to what is actually necessary to combat an emergent situation.

80. To consider the immediate impact of restrictions upon the realisation of the fundamental rights, the decision-maker must prioritise the various factors at stake. Such attribution of relative importance is what constitutes proportionality. It ought to be noted that a decision which curtails fundamental rights without appropriate justification will be classified as disproportionate. The concept of proportionality requires a restriction to be tailored in accordance with the territorial extent of the restriction, the stage of emergency, nature of urgency, duration of such restrictive measure and nature of such restriction. The triangulation of a restriction requires the consideration of appropriateness, necessity and the least restrictive measure before being imposed.”



39. A perusal of the decision of the Hon'ble Supreme Court in **Anuradha Bhasin** (*supra*) makes it evident that the doctrine of proportionality requires the authority imposing restrictions upon fundamental rights to identify the legitimate objective sought to be achieved by such restriction. The measure adopted must bear a rational nexus with the said objective and must be necessary for its attainment. Further, the authority is required to adopt only the least restrictive measure available in the facts and circumstances of the case.

40. In the present case, Respondent No. 1 has directed the temporary blocking of public access to Telegram until 22.06.2026 and the disabling of the message-editing feature until 30.06.2026, having regard to the NEET UG, 2026 examination scheduled to be conducted on 21.06.2026. The underlying object for these measures, as recorded in the Orders, was to avert any disruption of public order and to prevent the commission of cognizable offences arising from the dissemination of misleading information regarding leak of the examination papers and fraudulent activity by miscreants in relation to the NEET UG, 2026 examination on Telegram.

41. The Petitioners contend that the aforesaid measures of blocking of access to Telegram until 22.06.2026 and the disabling of the message-editing feature until 30.06.2026, do not constitute the least restrictive means for achieving the stated objective and, therefore, fail the test of proportionality. *Per contra*, the Respondents submit that, having regard to the mechanism employed by Telegram and the architecture of the platform, which enables rapid and widespread dissemination of information, the impugned measures constitute the least restrictive means available for achieving the legitimate objective stated in the Orders.



42. It is noteworthy that Telegram permits the large-scale addition of users to channels and groups. The platform architecture of Telegram is conducive to amplification and mass dissemination of content, enabling information to reach a substantial number of users within a short span of time. Consequently, any unlawful content, if circulated on Telegram, is capable of being amplified rapidly and likely to give rise to a public order situation.

43. Unlike other conventional platforms, Telegram is entirely cloud-based, thereby enabling the storage and retrieval of large volumes of content. Telegram also hosts an extensive bot ecosystem, which facilitates automated dissemination of content and other activities without human intervention. Further, the use of usernames in lieu of phone numbers enables concealment of user identifiers and facilitates the rapid dissemination of content, including content that may be illicit in nature.

44. Even where a particular channel is identified and, thereafter, disabled pursuant to complaints made by the concerned authorities, the subscriber base of such channel does not necessarily cease to exist, as Telegram's architecture permits the rapid creation of mirror channels under different names or identifiers, to which existing subscribers may be redirected. As a result, illicit activity may resume within a short period notwithstanding takedown action against the original channel. Further, Telegram permits messages, including files, to be edited at a later point in time. Such functionality may be employed to disseminate misinformation by editing messages sent prior in time by replacing the attachment to give impression that the examination paper was leaked prior to the examination even though such editing takes place after conclusion of the examination. Accordingly,



any subsequent editing of messages relating to NEET UG, 2026 may mislead general public and, consequently, give rise to a potential public order situation.

45. The Orders expressly record that entity-specific interventions, including the reporting and removal of channels, groups, bots, and accounts, were repeatedly found to be ineffective and inadequate. Further, the audience-migration mechanisms enable operators to rapidly reconstitute networks after enforcement action was taken by the concerned authorities. It is clearly observed in the Orders that despite corrective measures having been sought in relation to various misuses of the Telegram platform, fresh material, including reports received from Respondent Nos. 2 and 3, disclosed the continued occurrence of illicit activities by unlawful entities notwithstanding prior interventions. Therefore, it is evident that narrower measures, including the takedown of specific bots and channels, were ineffective having regard to the particular nature and architecture of the Telegram platform.

46. In the present case, the NEET UG, 2026 examination is scheduled to be conducted on 21.06.2026. The temporary blocking of Telegram under the Orders is operative only until 22.06.2026, while the disabling of the message-editing feature is confined to the period until 30.06.2026. The limited temporal scope of these measures demonstrates that they are narrowly tailored and confined to the period strictly necessary for securing the stated objective. Applying the parameters laid down in **Anuradha Bhasin** (*supra*), this Court is satisfied that the requirements of proportionality stand fulfilled, namely: (i) identification of a legitimate objective; (ii) existence of a rational nexus between the objective and the



measure adopted; (iii) necessity of the measure in the facts and circumstances of the case; and (iv) adoption of the least restrictive measure available.

47. Accordingly, the measures adopted by Respondent No. 1 under the Orders constitute the least restrictive measure for achieving the stated objective. Accordingly, the action of Respondent No. 1 in temporarily blocking public access to Telegram cannot be held to be disproportionate. Issue (ii) is, therefore, answered in the affirmative.

48. In view of foregoing analysis, the present Petition, along with pending Application, is hereby dismissed.

TEJAS KARIA, J
(VACATION JUDGE)

JUNE 19, 2026

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