VERDICTUM.IN

IN THE HIGH COURT FOR THE STATE OF TELANGANA, HYDERABAD

*** * ***

WRIT PETITION No. 35654 OF 2026

(CNR No. HBHC010731522026)

DATE: 12.11.2026

Between :

G. Harinath Goud, S/o. G.Krishna, Aged about 39 years, Occu: Business, R/o. H.No. 18-3-510, Hamambowli, Chatrinaka, Hyderabad.

… Petitioner

AND

1. The State of Telangana, Represented by its Principal Secretary, Home Department, Secretariat, Hyderabad.
2. The Director General of Police, State of Telangana, Lakdikapul, Hyderabad.
3. The Commissioner of Police, Hyderabad City, Hyderabad.
4. The Deputy Commissioner of Police, South Zone, Hyderabad,
5. The Assistant Commissioner of Police, Chatrinaka Division, Hyderabad.
6. The Station House Officer, Police Station Chatrinaka, Hyderabad.

… Respondents.

ORDER PRONOUNCED ON: 12.11.2026

THE HONOURABLE SRI JUSTICE N. TUKARAMJI

1. Whether Reporters of Local newspapers may be allowed to see the Judgment? : Yes

2. Whether the copies of judgment may be Marked to Law Reporters/Journals? : Yes

3. Whether His Lordship wishes to see the fair copy of the Judgment? : Yes

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N. TUKARAMJI, J

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*** THE HON'BLE SRI JUSTICE N. TUKARAMJI**

+ WRIT PETITION No. 35654 OF 2026

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Between:

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AND

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3. The Commissioner of Police, Hyderabad City, Hyderabad.
4. The Deputy Commissioner of Police, South Zone, Hyderabad,
5. The Assistant Commissioner of Police, Chatrinaka Division, Hyderabad.
6. The Station House Officer, Police Station Chatrinaka, Hyderabad.

… Respondents.

! Counsel for the petitioner : Mr. Bommagani Prabhakar,

^Counsel for respondents : Mr. Sridhar Bhuvanagiri, learned Assistant Government Pleader for Home, appearing for all the respondents.

<GIST:

> HEAD NOTE:

? Cases referred

Samala Srinivas Reddy v. State of Telangana, W.P. No. 28545 of 2022, dated 18.07.2022;

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Modem Mallesham v. Government of Andhra Pradesh, W.P. No. 36878 of 2013, dated 21.11.2025;

Ujwal @ Jagdish v. Commissioner of Police, W.P. No. 16865 of 2025, dated 23.04.2026;

Kharak Singh v. State of Uttar Pradesh, AIR 1963 SC 1295;

Gobind v. State of Madhya Pradesh, (1975) 2 SCC 148;

Malak Singh v. State of Punjab and Haryana, (1981) 1 SCC 420;

Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1;

Sunkara Satyanarayana v. State of Andhra Pradesh, (1999) 6 ALT 249.

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IN THE HIGH COURT FOR THE STATE OF TELANGANA

AT HYDERABAD

THE HONOURABLE SRI JUSTICE N.TUKARAMJI

WRIT PETITION No. 35654 OF 2026

(CNR No. HBHC010731522026)

DATE: 12.11.2026

Between :

G. Harinath Goud

… Petitioner

AND

The State of Telangana, Represented by its Principal Secretary, Home Department, Secretariat, Hyderabad, and five others.

… Respondents.

O R D E R:

This Writ Petition is filed under Article 226 of the Constitution of India seeking the following relief:

> *"…to issue an appropriate Writ, Order or Direction, more particularly one in the nature of Writ of Mandamus, declaring the action of the respondents in continuing the Rowdy Sheet in the name of the petitioner at PS Chatrinaka, without any subsisting material and without periodic review despite acquittal from all the criminal cases, is illegal, arbitrary and violative of Articles 14 and 21 of the Constitution of India and of the applicable Police Standing Orders and consequently direct the respondents to remove the Rowdy Sheet by considering the representations*

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dt.16-3-2024, 27-12-2025 and 1-9-2026, and to grant such other relief or reliefs…"

2. I have heard Mr. Bommagani Prabhakar, learned counsel for the petitioner and Mr. Sridhar Bhuvanagiri, learned Assistant Government Pleader for Home, appearing for all the respondents.

3.1. Learned counsel for the petitioner would submit that the rowdy sheet opened against the petitioner in the year 2008 on the basis of an F.I.R. dated 14.09.2008, is being continued for 18 years without any subsisting material warranting its continuation. It is contended that the petitioner was acquitted in C.C. Nos. 536 of 2009, 715 of 2009 and 644 of 2011, while in C.C. No. 811 of 2010 only a fine was imposed in connection with a neighbourhood quarrel and the proceedings in C.C. No. 5824 of 2019 were stopped under Section 258 of the Criminal Procedure Code, 1973 (CrPC), on 07.09.2022. Since no criminal case has been registered or pending against the petitioner thereafter, there is no justification for treating him as a habitual offender or continuing the rowdy sheet in the absence of any material indicating the likelihood of disturbance to public order.

3.2. Learned counsel would further submit that the respondents have neither disclosed the reasons for opening or continuing the rowdy sheet nor demonstrated that periodical reviews were undertaken in accordance

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with the applicable Police Standing Orders. The continued surveillance, repeated summoning to the Police Station and social stigma have adversely affected on the petitioner's reputation, dignity, privacy and peaceful family life, thereby infringing his fundamental rights guaranteed under Constitution. It is further contended that police surveillance cannot be continued indefinitely as a measure of punishment or harass, particularly when the petitioner has been leading a peaceful family life. Therefore, though the petitioner has submitted representations dated 16.03.2024, 27.12.2025 and 01.09.2026 to the Police Authorities including the Commissioner of Police, Hyderabad, seeking deletion of his name from the rowdy sheet, respondents have neither considered the same nor passed any reasoned order, contending that the continued maintenance of rowdy sheet is arbitrary, disproportionate and contrary to the principles of natural justice. The petitioner has, therefore, seeking a direction to the respondents to delete his name from the rowdy sheet maintaining at Chatrinaka Police Station.

4.1. Learned Assistant Government Pleader for Home, appearing for all respondents, would submit that the petitioner having criminal antecedents and was involved in seven criminal cases relating to offences affecting public peace and tranquility. It is contended that out of the said cases, two ended in acquittal, one resulted in conviction, two were compromised,

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one resulted in binding over proceedings and one was discharged under Section 258 of CrPC, in particular the petitioner was convicted in C.C. No. 100811 of 2010 arising out of Crime No. 402 of 2009 of Chatrinaka Police Station for the offences punishable under Sections 324, 452 and 504 of the Indian Penal Code, 1860 (IPC). It is a relevant consideration for continuing rowdy sheet.

4.2. Learned Assistant Government Pleader would further submit that the rowdy sheet was opened against the petitioner pursuant to the directions of the Assistant Commissioner of Police, Falaknuma Division, dated 31.12.2016 and being maintained up to 31.12.2026 after following the prescribed procedure under the Andhra Pradesh Police Manual Orders 599 to 602 and the Circular issued by the Director General of Police, Hyderabad, dated 22.07.2022. It is further contended that the petitioner is allegedly continuing indulging in activities causing nuisance and affecting public peace and tranquility and that members of the public out of fear reluctant to lodge complaints against the petitioner. Therefore, continued police surveillance is necessary to monitor his activities and prevent recurrence of offences of disturbance of public order. He would also submit that the respondents are merely discharging their legitimate duties and have neither harassed nor threatened the petitioner nor interfere with the personal life and liberty and nor they have taken any

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coercive steps. It is further contended that the petitioner has not disclosed complete particulars and outcome of the criminal cases registered against him and thereby failed to place entire factual position. In view of his criminal antecedents, the conviction, alleged continuing activities affecting public peace and tranquility, respondents contend that continuance of rowdy sheet is justified and that the writ petition being devoid of merit is liable to be dismissed.

5. I have carefully considered the rival submissions and perused the material placed on record.

6. The essential question that arises for consideration is whether the respondents are justified in continuing the rowdy sheet against the petitioner for nearly eighteen years, notwithstanding the conclusion of the criminal proceedings, and whether such continued surveillance is supported by relevant material and preceded by periodic reviews undertaken in accordance with the applicable Police Standing Orders.

7. The power of the police to open and maintain a rowdy sheet is preventive in nature and is intended to protect public peace and maintain law and order. However, such power is not unfettered and must be exercised strictly in accordance with the relevant Police Standing Orders and the constitutional guarantees enshrined under Articles 14, 19 and 21

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of the Constitution of India. Mere past involvement in criminal cases, by itself, cannot constitute an indefinite justification for opening or continuing a rowdy sheet or subjecting an individual to surveillance.

8. Standing Order No. 601 of the Telangana State (Andhra Pradesh) Police Manual, prescribes the categories of persons who may be classified as rowdies and against whom rowdy sheets may be opened. Clause (A) thereof includes persons who habitually commit, attempt to commit or abet the commission of offences involving breach of peace and disturbance to public order and security. Thus, habituality of conduct and the existence of relevant material indicating that the activities of an individual are likely to disturb public peace are relevant considerations for opening and maintaining a rowdy sheet. Consequently, mere registration or pendency of criminal cases, without anything more, cannot automatically justify classifying an individual as a rowdy or continuing a rowdy sheet against him.

9. This Court, in a number of decisions, has reiterated that involvement in a solitary criminal case, in the absence of material establishing habitual criminal activity, would not, by itself, justify the continued maintenance of a rowdy sheet.

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10. The requirements governing the continuation, discontinuance and reopening of rowdy sheets are contained in Standing Order Nos. 602 and 735, read with Standing Order No. 742(2) of the Telangana State (Andhra Pradesh) Police Manual. Standing Order No. 602 requires the competent authority to consider whether a history sheet or rowdy sheet should be continued, discontinued or reopened for a further period, in accordance with the prescribed conditions. Under Standing Order No. 602(2), mere absence of criminal involvement during the preceding five years does not, by itself, preclude continuation of a history sheet or rowdy sheet, provided the competent authority forms a considered opinion, on the basis of relevant material, that the individual's activities are prejudicial to the maintenance of public order or affect peace and tranquillity in the area, or that victims are unwilling to lodge complaints owing to threats or intimidation.

11. Further, Standing Order No. 735 prescribes the procedure to be followed for discontinuance of a history sheet or rowdy sheet and requires an appropriate order to be passed by the competent authority. Standing Order No. 742(2) extends the relevant procedural requirements to rowdy sheets as well. Therefore, continuation of a rowdy sheet cannot be mechanical or automatic. It must be preceded by periodic review, supported by relevant material and founded upon the considered

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satisfaction of the competent authority, in accordance with the applicable Standing Orders.

12. In *Samala Srinivas Reddy v. State of Telangana*, W.P. No. 28545 of 2022, dated 18.07.2022, this Court emphasised the necessity of examining whether the activities of an individual continue to be prejudicial to the maintenance of public order while considering continuation of a rowdy sheet. Similarly, this Court has directed closure of rowdy sheets in cases where no subsequent criminal activity or material indicating a threat to public peace was established. Further, in *Modem Mallesham v. Government of Andhra Pradesh*, W.P. No. 36878 of 2013, dated 21.11.2025, this Court reiterated that concluded criminal proceedings and vague apprehensions cannot, by themselves, justify indefinite surveillance. Likewise, in *Ujwal @ Jagdish v. Commissioner of Police*, W.P. No. 16865 of 2025, dated 23.04.2026, this Court held that continued maintenance of a rowdy sheet, without sufficient justification, particularly in the absence of pending criminal cases, is unsustainable.

13. The constitutional limitations governing police surveillance have been explained by the Hon'ble Supreme Court in a catena of decisions. In *Kharak Singh v. State of Uttar Pradesh*, AIR 1963 SC 1295; *Gobind v. State of Madhya Pradesh*, (1975) 2 SCC 148; and *Malak Singh v. State of*

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Punjab and Haryana, (1981) 1 SCC 420, the Hon'ble Supreme Court recognised the legitimate power of the police to maintain surveillance for the prevention of crime, but emphasised that such surveillance must be discreet and must not become an instrument of harassment or unjustified interference with the personal liberty of an individual. Further, in *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 SCC 1, the Hon'ble Supreme Court authoritatively recognised the right to privacy as a fundamental right forming an intrinsic part of Article 21 of the Constitution and laid down the three-fold test of legality, legitimate State interest or necessity, and proportionality, which must be satisfied whenever State action infringes the right to privacy. In *Sunkara Satyanarayana v. State of Andhra Pradesh*, (1999) 6 ALT 249, the erstwhile High Court of Andhra Pradesh also emphasised the necessity of relevant material, independent application of mind and recorded reasons for opening or retaining surveillance records. It was further held that surveillance cannot be resorted to as a means of harassing an individual and that a person cannot be compelled to attend the Police Station merely because his name finds place in a rowdy sheet.

14. Applying the aforesaid principles to the facts of the present case, the petitioner contends that the rowdy sheet was opened against him in the year 2008, whereas the respondents rely upon the proceedings of the

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Assistant Commissioner of Police to justify its continuation. According to the respondents, the petitioner was involved in several criminal cases, out of which two ended in acquittal, two were compromised, one resulted in binding-over proceedings, one was discharged under Section 258 CrPC, and one resulted in conviction. In particular, the respondents rely upon the alleged conviction in C.C. No. 100811 of 2010 for offences punishable under Sections 324, 452 and 504 IPC. However, the petitioner contends that the said Calendar Case resulted only in the imposition of a fine in connection with a neighbourhood quarrel. The discrepancy regarding the case number and its actual outcome, including the nature of the conviction, if any, therefore requires due consideration and verification.

15. Nevertheless, even an isolated conviction cannot, by itself, establish the present necessity for continued surveillance. Similarly, proceedings terminated under Section 258 CrPC cannot be treated as an acquittal on merits, though the circumstances surrounding such termination may be relevant while examining the subsequent conduct of the individual.

16. The petitioner specifically asserts that no criminal case has been registered or is pending against him since 2022. Though the respondents contend that the petitioner has continued to indulge in activities affecting

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public peace and that members of the public are afraid to lodge complaints against him, they have not placed on record any specific incident, complaint, occurrence report, preventive proceedings or other documentary material substantiating such allegations.

17. Further, the annual renewal proceedings produced by the respondents do not disclose any reasoned order or recorded satisfaction of the competent authority demonstrating compliance with Standing Order Nos. 602 and 735. A mere assertion that the prescribed procedure and the Deputy General Circular dated 22.07.2024 have been followed cannot substitute the actual review proceedings or the relevant material on the basis of which the decision to continue the rowdy sheet was taken.

18. The material furnished by the respondents discloses that the Station House Officer recommended continuation of the rowdy sheet on the ground that the petitioner was “active and energetic and that a close watch has been kept on him”. The reviewing authority, namely, the Assistant Commissioner of Police, merely endorsed the proposal by stating that “The proposal is hereby permitted to continue the rowdy sheet up to 31.12.2026.” Such an endorsement, ex facie, does not demonstrate independent application of mind or establish compliance with Standing Order Nos. 602 and 735.

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19. It is also relevant to note that the respondents contend that the rowdy sheet has been continued up to 31.12.2026. Such continuation cannot be justified merely by referring to the circumstances prevailing at the time when the rowdy sheet was originally opened. The object of surveillance is preventive and not punitive. Its continued maintenance, in the absence of sufficient and contemporaneous justification, would result in unwarranted interference with the personal liberty of the individual and may also expose him to social stigma.

20. Further, the petitioner's representations dated 16.03.2024, 27.12.2025 and 01.09.2026, seeking deletion of his name from the rowdy sheet, have not resulted in any communicated and reasoned decision by the competent authority. Failure to consider those representations and independently examine the continuing necessity for surveillance is inconsistent with the procedural safeguards governing the exercise of such power.

21. In view of the absence of any subsequent criminal activity, the conclusion of the earlier criminal proceedings, the absence of specific material substantiating the allegations made by the respondents and, more particularly, their failure to establish that meaningful periodic reviews were undertaken and supported by reasoned orders of the

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competent authority, this Court is of the considered view that the continued maintenance of the rowdy sheet against the petitioner is arbitrary, disproportionate and unsustainable under the applicable Police Standing Orders and the fundamental rights guaranteed under the Constitution of India. Accordingly, the respondents have failed to establish sufficient justification for further continuation of the rowdy sheet against the petitioner.

22. In view of the foregoing discussion and having regard to the several judgments rendered by this Court reiterating the manner in which rowdy sheets are required to be opened, periodically reviewed, continued and closed in accordance with Standing Order Nos. 601, 602, 735 and 742(2) of the Telangana State (Andhra Pradesh) Police Manual, as well as the principles laid down by the Hon'ble Supreme Court and this Court in the judgments referred to hereinabove, this Court considers it appropriate to issue the following operative directions for strict compliance by the police authorities:

I. PROCEDURE FOR OPENING A ROWDY SHEET:

A. Verification of eligibility: Before proposing the opening of a rowdy sheet, the Station House Officer (SHO) concerned shall independently verify whether the individual falls within any of the categories specified

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under Standing Order No. 601 and identify the specific provision applicable to the case. Mere registration of FIRs, involvement in an isolated criminal case or past criminal antecedents shall not, by themselves, justify the opening of a rowdy sheet.

B. Collection and assessment of material: The SHO shall collect and verify the particulars of all relevant criminal cases, including their crime numbers, dates, nature of allegations, specific role attributed to the individual, present status and outcome. The SHO shall assess the frequency, continuity and nature of the alleged activities and examine whether the material establishes habitual criminal conduct, wherever required, and its nexus with disturbance of public peace, public order or tranquillity, as contemplated under Standing Order No. 601. Fresh complaints, incidents and other credible material, if any, shall also be taken into consideration.

C. Submission of a reasoned proposal: Where the eligibility requirements are satisfied, the SHO shall submit a detailed proposal specifying the applicable category under Standing Order No. 601, particulars and outcomes of the criminal cases, material establishing habituality and the necessity for preventive surveillance. Vague, general or stereotyped allegations shall not be relied upon.

D. Independent approval: The competent authority shall independently scrutinise the proposal, verify whether the prescribed eligibility criteria are

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satisfied and examine the material establishing the necessity for surveillance. It shall not mechanically approve the recommendation of the SHO and shall record specific reasons for authorising the opening of the rowdy sheet. The proposal shall be rejected if the requisite conditions are not established.

II. PROCEDURE FOR PERIODICAL REVIEW AND SEEKING RENEWAL:

E. Timely review: Every rowdy sheet shall be reviewed periodically in accordance with Standing Order No. 602, read with Standing Order Nos. 735 and 742(2). The SHO shall initiate the review sufficiently before the expiry of the prescribed period and submit the renewal proposal within the stipulated time. Renewal shall not be treated as a routine administrative formality.

F. Preparation of a comprehensive review report: Before recommending renewal, the SHO shall undertake a fresh assessment and furnish a report containing the following particulars:

(a) The date and grounds for the original opening of the rowdy sheet and the category under Standing Order No. 601;

(b) Particulars of all criminal cases, including those registered after the opening of the rowdy sheet, together with their present status and outcomes;

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(c) Whether the individual has figured as an accused in any criminal case during the preceding five years;

(d) The date of the last criminal case or incident and the period elapsed thereafter;

(e) Details of fresh complaints, incidents, preventive actions or other credible material indicating continued involvement in activities warranting surveillance;

(f) The individual's conduct during the intervening period and whether the circumstances that originally necessitated the opening of the rowdy sheet continue to exist; and

(g) Specific material, if any, indicating that victims or members of the public are unwilling to lodge complaints owing to threats, intimidation or fear.

G. Consideration of criminal cases and subsequent conduct: The SHO shall examine the nature, outcome and relevance of each criminal proceeding. Acquittals, discharges, compromises, closure reports and other forms of termination of criminal proceedings shall be duly considered. The period elapsed since the last criminal case or incident, the individual's subsequent conduct, the absence of fresh complaints and any circumstances indicating cessation of the alleged activities shall also be taken into account. Old criminal cases, previous entries or an isolated

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conviction from the distant past shall not, by themselves, justify continued surveillance.

H. Specific consideration of the five-year period: While undertaking the review under Standing Order No. 602(2), the SHO shall specifically ascertain whether the individual has figured as an accused in any criminal case during the preceding five years. If no such case exists, the same shall be expressly recorded. Though such absence may not automatically require closure of the rowdy sheet, any recommendation for its continuation shall identify relevant and current material demonstrating that the individual's activities remain prejudicial to public peace, public order or tranquillity, or that victims are unwilling to come forward owing to threats or intimidation, as contemplated under the said Standing Order.

I. Reasons for recommending renewal: The renewal proposal shall clearly distinguish the material forming the basis for the original opening of the rowdy sheet from the subsequent material justifying its continuation. Mere repetition of old criminal cases, previous renewal orders or general apprehensions of future unlawful activities shall not suffice. Where no fresh criminal case or incident has occurred, the SHO shall specifically identify and substantiate the other circumstances, if any, warranting continued surveillance.

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III. INDEPENDENT SCRUTINY BY THE RENEWAL AUTHORITY:

J. Independent application of mind: The competent Gazetted Officer shall independently scrutinise the entire renewal proposal and the supporting material and shall not treat the SHO's recommendation as conclusive. The authority shall verify whether the individual originally satisfied the requirements of Standing Order No. 601 and whether the circumstances justifying the opening of the rowdy sheet continue to subsist.

K. Verification of criminal antecedents and subsequent conduct: The renewal authority shall examine the nature of the allegations, the specific role attributed to the individual, and the status and outcome of each criminal case relied upon. It shall also assess the period elapsed since the last criminal case or incident, the individual's conduct during the intervening period and the existence of fresh complaints or other credible material. Mere registration of FIRs or repetition of previous case particulars shall not, by themselves, establish continuing habitual criminal activity.

L. Scrutiny of the preceding five years: The renewal authority shall specifically ascertain whether the individual has figured as an accused in any criminal case during the preceding five years and expressly address that circumstance in its order. Where no such criminal involvement exists, continuation shall be permitted only upon recording a considered opinion,

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supported by relevant and current material, that the individual's activities nevertheless remain prejudicial to public peace, public order or tranquillity, or that victims are unwilling to come forward to lodge complaints owing to threats or intimidation, as contemplated under Standing Order No. 602(2). Any allegation of fear or intimidation shall be independently verified and supported by credible material. A general or repeated assertion shall not suffice.

M. Assessment of continuing necessity and proportionality: The renewal authority shall independently determine whether continued surveillance is necessary in the prevailing circumstances and whether the available material justifies its continuation. The longer the period of absence of criminal involvement or adverse conduct, the greater shall be the need for specific and convincing material supporting renewal. A rowdy sheet shall not be continued as a punitive measure or indefinitely on the basis of past conduct alone.

N. Reasoned order granting or refusing renewal: Every renewal decision shall reflect independent application of mind and specifically address the eligibility category under Standing Order No. 601, the relevant criminal cases and their outcomes, subsequent conduct, the period elapsed since the last incident, the five-year consideration, the existence of fresh or continuing material and the reasons establishing the necessity for further surveillance. A stereotyped endorsement or

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mechanical approval shall not constitute valid compliance. Where the prescribed eligibility requirements or the necessity for continued surveillance are not established, renewal shall be refused and the rowdy sheet discontinued in accordance with the applicable Standing Orders.

IV. REPRESENTATIONS, PERSONAL LIBERTY AND MAINTENANCE OF RECORDS:

O. Consideration of representations: Any representation seeking deletion of an individual's name from a rowdy sheet shall be objectively examined by the competent authority after verifying the relevant criminal records, outcomes of the proceedings, subsequent conduct and continuing necessity for surveillance. A reasoned decision shall be communicated to the individual within a reasonable period, preferably within four weeks from the date of receipt of the representation.

P. Protection of personal liberty and privacy: The opening or maintenance of a rowdy sheet shall not, by itself, authorise repeated summoning or compulsory attendance at a Police Station, restriction of movements, interference with occupation, or public humiliation or harassment. Any such action shall have independent legal justification and shall conform to the procedure established by law. Surveillance, wherever lawfully warranted, shall be discreet and proportionate to its legitimate preventive purpose.

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Q. Maintenance of records and accountability: The SHO shall maintain complete records relating to the opening, review, renewal and closure of every rowdy sheet, including the supporting material, proposals and orders passed. The SHO shall ensure the accuracy and verification of the material submitted, while the competent Officer shall be responsible for independent scrutiny and recording reasons for the decision.

R. Supervisory scrutiny and discontinuance: The Commissioners of Police and Superintendents of Police concerned shall ensure the implementation of these directions through their supervisory officers and periodically scrutinise the rowdy sheets maintained in their respective jurisdictions, particularly those continued for prolonged periods or in respect of individuals against whom no criminal case has been registered during the preceding five years. Wherever an individual no longer satisfies the requirements of Standing Order No. 601 or sufficient material does not exist to justify continued surveillance, the rowdy sheet shall be discontinued and the consequential surveillance records appropriately updated. Such discontinuance shall not preclude fresh action in accordance with law if subsequent credible material warrants it.

S. Strict compliance: All police authorities shall scrupulously adhere to the aforesaid procedure. No rowdy sheet shall be opened or continued mechanically, routinely or merely on the basis of past criminal antecedents. Every decision to open or continue a rowdy sheet shall be

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founded upon relevant material, independent application of mind, recorded reasons and due regard to the individual's constitutional rights to personal liberty and privacy.

23. In view of the foregoing discussion and findings, the Writ Petition is allowed. The continuation of the rowdy sheet against the petitioner, without relevant and contemporaneous material establishing the necessity for continued surveillance and without reasoned orders upon periodic review in accordance with the applicable Police Standing Orders, is declared arbitrary, disproportionate and violative of the petitioner's fundamental rights under Articles 14 and 21 of the Constitution of India.

24. Accordingly, the respondents are directed to forthwith close the rowdy sheet maintained against the petitioner, delete his name from the relevant surveillance records and update all consequential entries. This shall not preclude the competent authorities from initiating fresh action in accordance with law on the basis of any subsequent credible material.

25. To ensure uniform compliance with the applicable Police Standing Orders and the constitutional safeguards governing personal liberty and privacy, the following directions are issued to the police authorities throughout the State of Telangana:

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(i) The Director General of Police, Telangana (DGP), shall issue appropriate instructions to all Commissioners of Police, Superintendents of Police and other police authorities concerned, incorporating the principles and safeguards laid down in this judgment.

(ii) The opening, continuation, periodic review, renewal and discontinuance of rowdy sheets shall strictly conform to Standing Order Nos. 601, 602, 735 and 742(2) of the Telangana State (Andhra Pradesh) Police Manual and the directions issued herein.

(iii) Every proposal for opening a rowdy sheet shall be supported by relevant material establishing the individual's eligibility under Standing Order No. 601 and the necessity for preventive surveillance. Mere registration of criminal cases, involvement in an isolated case or past criminal antecedents shall not, by themselves, justify the opening of a rowdy sheet.

(iv) All existing rowdy sheets shall be periodically reviewed by the competent authorities, taking into account the individual's subsequent conduct, the status and outcome of criminal proceedings, any fresh incidents or complaints and the continuing necessity for surveillance. Particular attention shall be given to long-standing rowdy sheets and cases in which no criminal case has been registered during the preceding five years.

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(v) Every proposal for renewal shall be independently scrutinised by the competent authority, which shall record reasons demonstrating the continuing necessity for surveillance. Mechanical endorsements, stereotyped orders, reliance solely on past antecedents or general apprehensions of future unlawful activities shall not suffice.

(vi) Representations seeking deletion of names from rowdy sheets shall be objectively considered and disposed of by a reasoned order, preferably within six weeks of receipt.

(vii) The mere maintenance of a rowdy sheet shall not, by itself, result in repeated summoning or compulsory attendance at a Police Station, restriction of movement, interference with occupation, public humiliation or harassment. Any such action must have independent legal justification and conform to the procedure established by law.

(viii) Complete records shall be maintained in respect of the opening, review, renewal and closure of every rowdy sheet, including the supporting material, proposals and reasoned orders. The respective Commissioners of Police and Superintendents of Police shall ensure supervisory scrutiny and accountability.

(ix) The DGP shall ensure that these directions are communicated to all police units and that the officers concerned are sensitised to the legal

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requirements governing preventive surveillance and the constitutional rights to personal liberty and privacy.

(x) The DGP shall issue the necessary circular instructions and communicate the compliance framework to all Commissioners of Police and Superintendents of Police within four weeks from the date of receipt of a copy of this order. The jurisdictional authorities shall thereafter undertake a comprehensive review of all existing rowdy sheets and complete the exercise within three months from the date of receipt of the said instructions.

26. The DGP, Telangana, shall ensure effective implementation of these directions. The respective Commissioners of Police and Superintendents of Police shall monitor compliance within their jurisdictions and ensure that rowdy sheets are opened or continued only in accordance with the applicable Police Standing Orders and this order.

27. It is expressly clarified that these directions are intended to regulate, and not to restrict or curtail, the lawful exercise of preventive police powers. The competent authorities shall remain at liberty to take such preventive or other lawful action as may be warranted by any

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subsequent credible material, provided that such action is taken strictly in accordance with law.

28. There shall be no order as to costs. All pending miscellaneous petitions, if any, shall stand closed.

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N.TUKARAMJI, J

Date: 12.11.2026

Note : 1. Registry is directed to serve a copy to the DGP, Telangana State Police, for appropriate action.

2. L.R. copy to be marked.

B/o.
svl