

Power of Arrest Without Warrant Under the IT Act, 2000

Syllabus Topic : A Critique, Crimes of this Millennium

1.1 Crimes of this Millennium

Q. 1.1.1 Explain the crimes of this millennium. (Ref. Sec. 1.1) (5 Marks)

**Q. 1.1.2 List out the cyber crimes. Give the examples of cyber crime.
(Ref. Sec. 1.1) (5 Marks)**

- Cyber crime encompasses any criminal act handling computer systems and networks. Cyber crime additionally includes conventional crimes performed via the internet.
- A major attack vector of cyber crime is to exploit broken software. The crimes are either cybercrime or cyber related crimes.
- In this millennium cyber crime is increasing day by day. The crimes carried out by cyber criminals are :
 - o Password trafficking
 - o Copyright (software, movie, sound recording) piracy
 - o Trademark counterfeiting
 - o Counterfeiting of currency
 - o Data transfer theft
 - o Misuse of computer time
 - o Computer intrusion (i.e. hacking)
 - o Computer output theft
 - o Desktop forgery
 - o Wrongful programming



- Child Pornography X:\2019\MUMBAI-BSC-IT\Suvarna Shirke\Cyber laws of Exploitation.
 - Child Exploitation and Internet Fraud matters that have a mail nexus.
 - Internet Fraud.
 - Internet harassment.
- One example of cybercrime is cyber criminals tried to celebrate the Valentine Day in advance in the year 2000 so they chose the dates 6, 7 and 8 February to greet the E-Commerce site happy Valentine's Day in advance that is before 14th February, the ecommerce sites buy.com, Yahoo, eBay, and amazon.com were slow and shut down for hours.
- At that time the cyber criminals also send one virus called "I love you" this virus spread very rapidly and results in great loss.
- In year 1999 Melissa virus spread around, this virus affects the email system and results in a huge loss.
- In recent time some hackers group were also active. One group from Pakistan called 'G' hacked and defeated more than 40 Indian websites.
- The websites they hacked were : Agricultural University of Maharashtra, National Research Centre Asian Age newspaper, Indian Science Congress, Indian Institute of Management Ahmadabad, the Gujarat government Indian Institute of Technology Madras Centre for electronics design and Technology, Glaxo welcome, the Gujarat government and some other websites.
- The second group called 'Doctor Nuker' which is founder of Pakistan hackers club hacked sites of Indian Parliament, Ahmadabad telephone exchange, engineering export, Promotion Council, and United Nations (India).
- The third group called 'Nightman' hacked websites owned by government and website set up by the Indian companies.
- Some of the sites this group has ruined are: Blue Star InfoTech, Lal Bahadur Shastri National Academy of Administration and Mahindra and Mahindra.
- Every year Indian government is spending lots of money on e-security. Actions are taken against the cybercrime but still day by day it is growing.

**Syllabus Topic : Section 80 of the IT Act, 2000 - A Weapon or a Farce?****1.2 Section 80 of the IT Act, 2000 - A Weapon or a Farce?**

- Q. 1.2.1 Explain the power of police officer and other officers. (Ref. Sec.1.2) (5 Marks)**
- Q. 1.2.2 Explain the ingredients of Section 80. (Ref. Sec.1.2) (5 Marks)**
- Q. 1.2.3 Explain characteristics of cyber crimes that do not allow immediate arrest of the accused by the law enforcement agency in many cases. (Ref. Sec.1.2) (5 Marks)**

- As the threat of cyber crime is increasing, so to make the cyber crime punishable, Section 80 is added in the Information Technology Act, 2000 by the legislature.
- Section 80 in The Information Technology Act, 2000 has following things.

☞ Section 80 : Power of police officer and other officers to enter, search, etc.

- (1) Notwithstanding anything contained in the Code of Criminal Procedure, 1973 (2 of 1974), any police officer, not below the rank of a Deputy Superintendent of Police, or any other officer of the Central Government or a State Government authorized by the Central Government in this behalf may enter any public place and search and arrest without warrant any person found therein who is reasonably suspected of having committed or of committing or of being about to commit any offence under this act.

Explanation : For the purposes of this sub-section, the expression "public place" includes any public conveyance, any hotel, any shop or any other place intended for use by, or accessible to the public.

- (2) Where any person is arrested under sub-section (1) by an officer other than a police officer, such officer shall, without unnecessary delay, take or send the person arrested before a magistrate having jurisdiction in the case or before the officer-in-charge of a police station.
- (3) The provisions of the Code of Criminal Procedure, 1973 (2 of 1974), shall, subject to the provisions of this section, apply, so far as may be, in relation to any entry, search or arrest, made under this section.
- Section 80 is applied to only those offences which are defined under the IT Act, 2000. It is not applied to the cyber crimes which are under other laws, for example, defamation via Email is no offence under the IT Act, 2000. Section 80 is not applied to such cases. The following are the ingredients of Subsection (1) of Section 80.
 - o The power to enter any public place and search and arrest without warrant any person found therein, is vested only in a Police Officer not below the rank of Deputy



Superintendent of Police (DSP) or any other officer of the Central Government or a State Government who is authorized by a Central Government.

- The power can be exercised only in a “public place” which as per the Explanation to Section 80 includes any public conveyance, any hotel, any shop or any other place intended for use by or accessible to the public;
- This power to enter any public place and search and arrest without warrant any person from there it can be exercised only on the ground that such person is reasonably suspected of having committed or committee or of being about to commit any offence under the IT Act, 2000.
- It is clear in Section 80 of IT Act, 2000 that the accused can be arrested without warrant only from the public place not from any other place.
- Accuse can be arrested for committing or having committed or about to commit any offence under IT Act, 2000.
- To understand these provisions, 3 situations are covered therein; in these situations the offences are committed under IT Act, 2000.
 1. If a person is alleged that he has committed an offence in a place other than a public place but he is found in a public place.
 2. If a person is alleged to have committed an offence in a public place but is found in some other public place.
 3. If a person is alleged to have committed or is committing or is about to commit an offence in a public place and is found in that very public place.
- The above situations only focus on the place where the accused is arrested that is a public place. The restriction of arresting an accused from public place makes Section 80 vulnerable for defeating magnificently, it is explained using following example:
 - If a person A is suspected of having committed a hacking offence from his house. He went to the hotel after committing the offence. As hotel is a public place the accused can be arrested without warrant. But if the after committing the hacking offence he stay at home the he cannot be arrested without warrant as per Section 80.
 - This example shows that the Section 80 is established without any consideration of the internet and cyber criminality which is different from traditional crimes.
 - There are some characteristics of cyber crimes that do not allowed immediate arrest of the accused by the law enforcement agency in many cases.
 1. Geographical distance and borders are irrelevant to cyber crime. Cyber crime can be committed by sitting at one corner of the globe. It is easy to hack victim banks



computer system located at another place by sitting at the corner and to transfer funds online by sitting at another corner, so the cyber criminals are not visible, they can be anywhere.

2. To commit cybercrime cyber criminals do not come face to face with the victim and he is not physically present while committing crime. For example to rob a bank there is no need that the cyber criminals should be physically present like traditional thief.
3. To investigate cybercrime it is very difficult to collect evidence of cybercrime. It is a very time consuming process. To find out the cyber criminal is a cumbersome job in most of the cases.
4. Cyber crime investigation process is time consuming but commission of cybercrime is very efficient it will take few seconds to plant virus into a computer system or perform online frauds, the best example of this is "I love you" virus which is spread within 2 hours all over the globe. So then logic of restricting the arrest of the accused without warrant from only public place is refused to obey undisputed characteristics of cyber criminality. So, it may happen that the criminal at one place but before taking the warrant he might escape, it shows that the Section 80 is farce.

Syllabus Topic : Forgetting the Line Between Cognizable and Non-Cognizable Offences

1.3 Forgetting the Line between Cognizable and Non-Cognizable Offences

Q. 1.3.1 Explain cognizable offence. (Ref. Sec.1.3)	(5 Marks)
Q. 1.3.2 Explain Non-cognizable offence. (Ref. Sec.1.3)	(5 Marks)
Q. 1.3.3 Write down the difference between cognizable offence and Non-cognizable offence. Explain cognizable offence. (Ref. Sec.1.3)	(5 Marks)

- The accused arrested from the public place without warrant but there is still confusion in law and for exposing the same it is necessary to understand the basics of criminal procedure under our law.
- There are two types of offences
 1. Cognizable offences
 2. Non-cognizable offence



→ 1. Cognizable offences

- An offence in which an accused is arrested without a warrant is called cognizable offence.
- In cognizable offences the police officers have the power to arrest an accused without warrant.
- In cognizable offences First Information Report (FIR) is registered. Fear the state will play the role of prosecutor and the Victim is only a witness for the prosecution.
- When a cognizable offence is committed the victim or the informant first approach the concern police station which comes within his jurisdiction the office has been committed.
- Section 154 of code of criminal procedure contains the procedure for registration of an FIR. It is given as follows :

A) Section 154 : Information in cognizable cases

- (1) Every information relating to the commission of a cognizable offence, if given orally to an officer in charge of a police station, shall be reduced to writing by him or under his direction, and be read over to the informant; and every such information, whether given in writing or reduced to writing as aforesaid, shall be signed by the person giving it, and the substance thereof shall be entered in a book to be kept by such officer in such form as the State Government may prescribe in this behalf.
 - (2) A copy of the information as recorded under sub-section (1) shall be given forthwith, free of cost, to the informant.
 - (3) Any person aggrieved by a refusal on the part of the officer-in-charge of a police station to record the information referred to in sub-section (1) may send the substance of such information, in writing and by post, to the Superintendent of Police concerned who, if satisfied that such information discloses the commission of a cognizable offence, shall either investigate the case himself or direct an investigation to be made by any police officer subordinate to him, in the manner provided by this Code, and such officer shall have all the powers of an officer- in-charge of the police station in relation to that offence.
- In Section 156 of code of criminal procedure it is mentioned that any officer in charge of the police station may investigate any cognizable case falling within the jurisdiction of such police station without the order of a magistrate.

- The Section 157 of code States the procedure of Investigation in cognizable offences is as follows :

B) Section 157 : In The Code Of Crimlinal Procedure, 1973

➤ Section 157: Procedure for Investigation preliminary Inquiry

- (1) If, from information received or otherwise, an officer in charge of a police station has reason to suspect the commission of an offence which he is empowered under Section 156 to investigate, he shall forthwith send a report of the same to a Magistrate empowered to take cognizance of such offence upon a police report and shall proceed in person, or shall depute one of his subordinate officers not being below such rank as the State Government may, by general or special order, prescribe in this behalf, to proceed, to the spot, to investigate the facts and circumstances of the case, and, if necessary, to take measures for the discovery and arrest of the offender; Provided that
 - (a) When information as to the commission of any such offence is given against any person by name and the case is not of a serious nature, the officer in charge of a police station need not proceed in person or depute a subordinate officer to make an investigation on the spot;
 - (b) If it appears to the officer in charge of a police station that there is no sufficient ground for entering on an investigation, he shall not investigate the case.
- (2) In each of the cases mentioned in clauses (a) and (b) of the proviso to sub- section (1), the officer in charge of the police station shall state in his report his reasons for not fully complying with the requirements of that sub section, and, in the case mentioned in clause (b) of the said proviso, the officer shall also forthwith notify to the informant, if any, in such manner as may be prescribed by the State Government, the fact that he will not investigate the case or cause it to be investigated.

The cognizable cases should be investigated by the police officer not below the rank of DSP or The government officer authorized by the central government as given in Section 80. Here, the police officer has the right to initiate the investigation without judicial order. The investigation officer is also known as "IO". Investigation officer has the power during investigation, the attendance of person who is familiar with the facts and situations of the case, for recording the statement. After completing the investigation of case the police officer need to file a charge sheet or Challan or police report against accused before the criminal court.

☛ Examples of cognizable offences

- Hacking with computer system.
- Publishing and transmitting the obscene information.
- Tampering with the source document of computer system.

1.3.1 Non-cognizable Offence

- An offence in which an accused is arrested with a warrant is called non cognizable offence.
- In non cognizable offences police officer do not have the authority to arrest an accused without warrant.
- In non-cognizable offences First Information Report (FIR) is not registered. Non cognizable offence criminal complaint only files in the court of magistrate. If the informant makes the complaint at police station related to non cognizable offence, the police record the matter of the information as a Non-Cognizable Report (NCR) in the authorized book and refer the informant to the judicial magistrate.
- Referring to Judicial Magistrate implies that the informant must file a criminal complaint in the court of the concern judicial magistrate. When the magistrate receive a criminal complaint, Magistrate use his judicial mind and take cognizance of the offence, then the magistrate examines the complaint and the witnesses, the matter of which shall be reduced into writing. Such type of recording of the statement by the magistrate is commonly referred to add preliminary complaints evidence.
- The magistrate studies the evidence shown on the behalf of complainant and if he feels that there is sufficient ground for proceeding, he will issue process to the accused for facing trial. This is a very long process; many times it takes years to reach the stage of issuance of process to the accused under the criminal complaint procedure.
- As compared to this FIR process is very effective. It may happen that before postpone the issuance of process and ask for investigation by police decides whether there is sufficient ground for proceeding against accused.
- The criminal procedure is very slow in non cognizable offence cognizable add in cognizable case police do not require any order who conduct the investigation.
- The classification of offences is done as cognizable and non cognizable offences based on the serious means of offices. This classification is done to reduce the burden of the police as they have limited resources. Cognizable offences are generally serious offences as compared to non cognizable offence.

☞ Examples of non-cognizable offences

- Publishing digital signature certificate which is a false in certain particulars.
- Publishing digital signature certificate for fraudulent purpose.
- Misinterpretation or suppression of a material fact from the controller or certifying authority for obtaining any license or digital signature certificate.

Syllabus Topic : Necessity of Arrest without Warrant from any Place, Public or Otherwise

1.4 Necessity of Arrest without Warrant from any Place, Public or Otherwise

Q. 1.4.1 Why there is necessity of arrest without warrant from any place, public or otherwise? (Ref. Sec. 1.4) (5 Marks)

- There are so many anomalies in Section 80, so there is a debate that whether the power of arrest without warrant is justified or is it harsh in nature.
- The power of arrest without warrant only from a public place should be scrapped; there should not be any such type of limitations. So there is a need to remove the anomalies in Section 80 in the present form.
- The power of arrest without warrant from any place is justified. Otherwise, fabric criminality there should be penalty under the IT Act.
- If the offence is non-cognizable, then it put a big burden on prosecution upon the complainant.
- As we are aware that cyber crimes have no border distance and cyber criminals are invisible then it is unreasonable the victim to undergo a complaint procedure and to wait for years or for a long time to appear and face trial.
- By looking the nature of cyber criminal it is a very difficult task for the complainant, it discourage them from taking action against cybercrime and as a result many cyber crime remains unpublished.
- The investigation of the cybercrime is done by the police officer so it is important to vest power of arrest without warrant in the specified police officer and government officer as in Section 80 regardless of the accused place.
- In non-cognizable cases court ask the police officer to do the investigation but the investigation of many cybercrime is tiresome. The power of court direct and investigation

is not equal to the investigation initiated by the police in cognizable cases. The power of police is more powerful appreciate that the procedure of moving the cold and get an order for investigation.

- Some amendments in Section 80 to remove the anomaly 'public place' and make it effective against offences under the IT Act, 2000.
 1. Delete the word 'public' from subsection (1).
 2. Remove the explanation.
 3. Instead of using the words like 'Any offence under this act' use the word 'Any cognizable offence under this act'.

Syllabus Topic : Checks and Balances against Arbitrary Arrests

1.5 Checks and Balances against Arbitrary Arrests

Q. 1.5.1 Explain the checks and balances against arbitrary arrest. (Ref Sec 1.5) (5 Marks)

- As per the debate on Section 80, it is also important that to check whether the checks against arbitrary arrest are reasonable.
- The securities given by the legislature in section 80 are
 - o The power of arrest without warrant is given in a high ranking police officer that is no rank below Deputy Superintendent of Police or any officer authorized by the central government.
 - o The basis on which you are arresting a suspicion should be reasonable.
- The power of arrest is given to high rank police officers that are not below the DSP. It is argued that this protection is rude and not commendable in nature. It is observed that police officer not below the DSP would fairly use the power of arrest without warrant. It is also said that the DSP of inspector from the same Police Force share the same morals and that it makes no difference. So it is not fair to compare a DSP with inspector.
- The grant power of arrest to a high rank officer enhances the credibility when compared to exercise of same power by a sub inspector or any other low rank officer. But this protection is not enough there is a need of more protection.
- Other different characteristics of cyber criminality are the technology. With the advanced technology cybercrime are also growing and it is impossible for high rank officer to keep himself updated with the technology. So it is important that there should be expert from

- the field of Information Technology to assist DSP or any other authorized government officers.
- The infrastructure to deal with the traditional crimes is not sufficient, so, it should be suitable tailored to stand up to the challenges of cybercrime.
 - Couple the high rank officer investigating skills with technological expertise of an IT professional to make investigation effective under the IT Act and to prevent arbitrary arrests of innocents.
 - It may happen due to the invisibility of cyber criminal that sometimes an innocent may fall into the net of DSP during the investigation, so, the IT professionals are effective to find out the innocent people and criminals. So, this is also a measure to check on the potential of misuse of the power to arrest without warrant.
 - The lawmakers have also not listed out many cyber crimes in IT Act, 2000. Cybercrime like email abuse and online frauds are within the domain of Indian penal code 1860, which can be investigated by the lower rank police officers.
 - The cyber crimes which are not covered by the IT Act, should also be get investigated by the higher rank officers with the help of IT experts.
 - First of all find out cyber crime which are not covered under the IT Act and then suitable amendments should be carried out in the law to bring them under one umbrella.
 - The police should recruit IT officer instead of giving training to the existing police officers on information technology.
 - Another attack done by the critics against Section 80 is against the word 'reasonable is suspected'. The critics think that it is loose, subjective and hence it is exposed for misuse. The critics think that it may be possible that the investigating police officer may misuse this word. But under the Criminal Procedure Code 1973 police investigation or arrest can be initiated only if there is some credible basis or material so it is important that the Judiciary must force the consent of the requirement of reasonable suspicion for arrest without warrant.
 - It may be possible that due to lack of understanding of the advanced technology the police officer is not able to entertain reasonable suspicion so it is advised to take the IT expert help.



Syllabus Topic : Arrest for “About to Commit” An Offence Under The IT Act : A Tribute To Draco

1.6 Arrest For “About to Commit” An Offence Under The IT Act : A Tribute To Draco

**Q. 1.6.1 Write a short note on Arrest for “About to Commit” an Offence.
(Ref.Sec.1.6)**

(5 Marks)

- In Section 80 of IT Act, 2000, a citizen can be penalized on ‘about to commit’ any offence. As per black's law dictionary the word about means: Quantity, number, near in time, quality or degree, substantially, approximately.
- The ‘About to commit’ word implies preparation for committing any offence under the IT Act 2000. This component is wide open for misuse or is ex-facie draconian.
- There are many chances that the innocent people can be put behind the bar on the grounds of being about to commit an offence.
- Examples of misconstruction of these ‘about to commit’ are as follows :
 1. If a person is visiting a website which is giving the information about how to hack a website, that person can be arrested on the allegation committing hacking under Section 66, although he is viewing for fun.
 2. If a person is visiting a porn website for his friend about the website, he can be arrested under the Section 67 for transmitting the obscene material.
- Preparation means arranging the measures for committing the offence. Where attempt is to commit the offence. The attempt is a direct where preparation is not a direct move. So the person should be convicted of attempt to commit.
- If a person is convicted of attempting and often it is also important that he must have to show the intention of committing the offence and secondly to have done and at which constitutes the act as of a Criminal attempt. Sir James Stephen in Hindi digest of criminal law define attempt as: “An act done with intent to commit that crime and form part of series of acts which will constitute its actual Commission If it were not interrupted”. The point where the series of acts started cannot be defined but it depends upon the circumstances of each case. For example, A truck was carrying paddy from Mumbai to Delhi allegedly in breach of the Mumbai paddy order, the sub inspector of food and supplies department stopped the truck at Samalkha which is 32 miles away from Delhi.



- Prosecution was launched against the accused but the question arose that does the offence of attempt had been committed.
- The Supreme Court held it negative and acquitted the accused. It was held that it may be possible that the accused may be warned that he is not having license for carrying paddy and they might have changed their mind at any place between Samalkha barrier and Delhi border and have not continued further in their journey, so, the offence of attempt had not been committed. It was held that the act of accused only match to preparation.

Syllabus Topic : Arrest, But NO Punishment !

1.7 Arrest, But NO Punishment !

Q. 1.7.1 Write a short note on arrest but no punishment. (Ref. Sec.1.7) (5 Marks)

- The accused can be arrested under Section 80 on three grounds, these three grounds are as follows :
 1. Of having committed or
 2. Of committing or
 3. Of being about to commit.
- The words 'having committed' are referred to situation where the offence has been concluded.
- The words 'of committing' are referred to situation where a person is caught in the process of commission of an offence which has not yet concluded. The concept of a team covers within its boundary this situation i.e. of committing.
- The words 'about to commit' are referred to a stage of preparation. This is a stage before second category that is 'of committing'.
- The given three categories are misunderstood, instead of generating three categories, subsection (1) of Section 80 can make the use of words 'reasonably suspected of being concerned'. It would cover the situations of attempt, the commission of the offence, abettors and the conspirators. As per today's Section 80 the abettors and the conspirators cannot be arrested without warrant from public place. In addition, in IT Act, 2000, some provisions should be added for publishing abetment and conspiracy. Under the IT Act, 2000, in most of the offences the offence of attempt is not stated.
- If any event happened and the grounds of arrest are 'of committing' and 'of being about to commit' then it is not harmful with other provisions of IT Act, 2000. For example, a



person is about to commit hacking of a computer system or is committing it, That person can get arrested under Section 80 but he cannot be punished under Section 66 for the offence of hacking a computer system because it does not cover either of committing or of being about to commit within its boundary.

- Only Section 70 of IT Act all the offences speak of attempt and thus indirectly covers the situation of committing referred to in Section 80.
- Some provision should be done in IT Act for these grounds, if the situation which we have seen only made for preventing arrest, it should be clarified by the law. The provision same as Section 151 of Criminal Procedure Code should be incorporated in IT Act.

☞ **Section 151 : Arrest to prevent the commission of cognizable offences**

- (1) A police officer knowing of a design to commit any cognizable offence may arrest, without orders from a Magistrate and without a warrant, the person so designing, if it appears to such officer that the commission of the offence cannot be otherwise prevented.
- (2) No person arrested under sub-section (1) shall be detained in custody for a period exceeding twenty-four hours from the time of his arrest unless his further detention is required or authorized under any other provisions of this Code or of any other law for the time being in force.

1.8 Exam Pack (Review Questions)

THE NEXT LEVEL OF EDUCATION

☞ **Syllabus Topic : A Critique, Crimes of this Millennium**

- Q. 1 Explain the crimes of this millennium. (Refer Section 1.1) (5 Marks)**
- Q. 2 List out the cyber crimes. Give the examples of cyber crime. (Refer Section 1.1). (5 Marks)**

☞ **Syllabus Topic : Section 80 of the IT Act, 2000 - A Weapon or a Farce?**

- Q. 3 Explain the power of police officer and other officers.(Refer Section 1.2) (5 Marks)**
- Q. 4 Explain the ingredients of section 80. (Refer Section 1.2) (5 Marks)**
- Q. 5 Explain characteristics of cyber crimes that do not allow immediate arrest of the accused by the law enforcement agency in many cases. (Refer Section 1.2) (5 Marks)**

☞ **Syllabus Topic : Forgetting The Line Between Cognizable and Non-Cognizable Offences**

- Q. 6 Explain cognizable offence. (Refer Section 1.3) (5 Marks)**

- Q. 7 Explain Non-cognizable offence. (Refer Section 1.3) (5 Marks)
- Q. 8 Write down the difference between cognizable offence and Non-cognizable offence. Explain cognizable offence. (Refer Section 1.3) (5 Marks)
- ☞ **Syllabus Topic : Necessity of Arrest without Warrant from any Place, Public or Otherwise**
- Q. 9 Why there is necessity of arrest without warrant from any place, public or otherwise? (Refer Section 1.4) (5 Marks)

☞ **Syllabus Topic : Checks and Balances against Arbitrary Arrests**

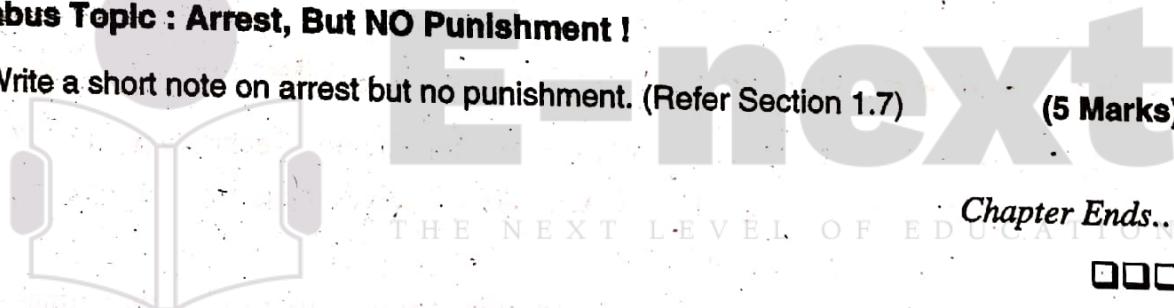
- Q. 10 Explain the checks and balances against arbitrary arrest.(Refer Section 1.5) (5 Marks)

☞ **Syllabus Topic : Arrest for “About to Commit” An Offence Under The IT Act : A Tribute To Draco**

- Q. 11 Write a short note on Arrest for “About to Commit” an offence.
(Refer Section 1.6) (5 Marks)

☞ **Syllabus Topic : Arrest, But NO Punishment !**

- Q. 12 Write a short note on arrest but no punishment. (Refer Section 1.7) (5 Marks)



Chapter Ends...