

The Impact of the Anti-Defection Law on Indian Politics: A Comparative Case Study of Maharashtra, Madhya Pradesh, and Karnataka

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Abstract:

The Anti-Defection Law was enacted through the 52nd Amendment Act of 1985 as per the Tenth Schedule of the Indian Constitution, referring to the political opportunism and stabilizes India's parliamentary democracy. Despite almost thirty years of operation and significant changes in 2003, there is still a continuous tendency by Legislator defections to bring down state administrations. This is particularly evident in Karnataka (2019), Madhya Pradesh (2020), and Maharashtra (2022–2024). To determine whether the law has fulfilled its constitutional goals or not. This paper conducts an empirical, case-study-based analysis of these three incidents that happened. The study, which draws from institutional reports, legislative data, and court proceedings, concludes that although the law has curbed individual, ad hoc floor-crossing, it has also encouraged planned mass resignations and intra-party factional splits that avoid its disqualification provisions. The primary structural flaw in all three instances is the speaker's dual function as a member of a political party and a quasi-judicial arbiter. The study makes an evidence-based case for institutional reform after concluding that procedural flaws, adjudicatory delays, and the lack of an independent tribunal have significantly reduced the law's formal deterrent power.

Keywords: legislative stability, Speaker adjudication, Indian politics, political defection, anti-defection statute, and the Tenth Schedule.

Introduction

Since independence, political defection—the act of an elected lawmaker leaving the party on whose ticket they were elected—has frequently occurred in Indian parliamentary politics. The term "Aaya Ram, Gaya Ram" became well-known in the late 1960s after Haryana lawmaker Gaya Lal changed parties three times in one day (PWOnlyIAS, 2024). Defections caused over thirty state administrations to fall between 1967 and 1971, which led Parliament to enact the 52nd Amendment Act of 1985, which included the Tenth Schedule to the Constitution (Vidhi Centre for Legal Policy, 2023). The law, also known as the Anti-Defection Law, disqualifies legislators who vote against the party whip without prior authorization or who voluntarily resign from their political party.

The 91st Amendment Act of 2003 significantly changed the Tenth Schedule by eliminating the previous exemption for lawmakers who formed a breakaway faction with at least one-third of a party's elected members (the "split" defence) but keeping the exemption for a legitimate merger backed by two-thirds of a party's legislators (PRS Legislative Research, n.d.). Closing a loophole that had been used to justify defections under the pretense of intra-party divisions was the stated justification.

However, the effectiveness of the rule is still up for debate among academics and judges more than 40 years after it was first introduced. India has seen a new pattern of planned, large-scale defections designed to overthrow current state governments—in Karnataka in 2019, Madhya Pradesh in 2020, and Maharashtra between 2022 and 2024—while individual, spontaneous floor-crossing of the kind seen in the 1960s and 1970s has become relatively rare. An important empirical question arises from these incidents that, Has the defections been really limited by Anti-Defection Law as a political rivalry tactic, or while having mainly focus on maintaining its frequency and destabilizing effects, has it only changed the form of defections? While taking example from critical analysis of comparative and case-study-based empirical analysis of the Karnataka, Madhya Pradesh, and Maharashtra episodes, this paper attempts to answer the above issue. It is focussed on assessing the structural aspects of the law, especially the Speaker's adjudicatory function, which have allowed defection to continue in new institutional forms and places. These cases which exist within the corpus of existing legal and political science, work on the Tenth Schedule.

Literature Review

The below mentioned major categories can be used to classify scholarship on the Anti-Defection Law: Judicial commentary, Empirical-political evaluation, and Doctrinal-constitutional analysis.

Doctrinal and Constitutional Perspectives

The Tenth Schedule's wording, constitutionality, and internal coherence are all examined in a sizable corpus of legal study. Malik (2025) critically analyzes the constitutional implications of the statute and contends that, despite its initial goal of maintaining political stability, it has been extensively abused within the Indian political scene through politically motivated defections, intimidation, and horse-trading. Similar to this, doctrinal studies reviewed in the Civil Law Journal (2025) point out that while the law is praised for encouraging party discipline and lowering instability, it is also criticized for permitting horse-trading and restricting lawmakers' freedom of speech. The normative tension at the core of the law is established by these accounts: a legislator's ability to make independent decisions is limited by the same disciplinary mechanism that discourages opportunistic defection.

Judicial Commentary

In *Kihoto Hollohan v. Zachillhu* (1992), the Supreme Court resolved the constitutionality of the Tenth Schedule by upholding the law but holding that the Speaker's adjudicatory decisions are subject to judicial review, departing from the previous position that such decisions are final (SleepyClasses, 2026; Drishti IAS, 2019). The 2020 Karnataka MLAs case and the 2023 Maharashtra (Subhash Desai) ruling, by making it clear that a legislative faction's numerical majority cannot determine, by itself, which faction constitutes the "real" political party for Tenth Schedule purposes, on the basis of which, scholarship has traced how the Court's interpretive approach evolved further (ThePrint, 2025; Inkl, 2024). In their thorough analysis of this expanding judicial role, Kalra et al. (2023) contend that courts have been forced to resolve a persistent conflict between preventing defections and defending the democratic rights of legislators, especially since the Speaker's institutional position has proven resistant to the impartial application of the law.

Empirical and Political Science Perspectives

The empirical impacts of the law on political stability and defection rates have been the subject of a very small body of literature. Combining case studies, expert interviews, and statistical analysis of legislative outcomes, an empirical study published in TIJER (2023) concludes that while the law has decreased large-scale individual defections and increased political stability, it has also had unintended consequences, such as a decline in internal party democracy and a decrease in elected officials' accountability to their constituents. The report "Anatomy of India's Anti-Defection Law" (Sharma & Gupta, 2023) from the Vidhi Centre for Legal Policy goes further, claiming that the law has not done much to accomplish its stated goal and pointing out that defections are still a "two-way street" that is primarily influenced by party behavior, such as incentives given to opposing lawmakers. — as by individual legislators' opportunism. Specific gaps in this literature are identified by a theoretical paper published in 2025: an understudied post-2019 judicial trajectory; a persistent reliance on narrow doctrinal or descriptive approaches that fail to capture the law's multidimensional implications for democratic accountability; and the lack of systematic empirical accountability metrics capable of measuring the law's effects on legislative behavior and constituent satisfaction (Suresh, 2025). By conducting a systematic comparative analysis of three of the most significant post-2019 defection occurrences, this paper directly addresses these shortcomings.

Methodology

In addition to descriptive statistical data from secondary sources, this study uses a qualitative, comparative case-study design. The study is conducted by choosing the three incidents purposefully because they (a) happened after the 2003 amendment closed the "split" exemption, (b) caused a sitting state government to shift or fall, and

(c) produced important litigation that led to putting the Tenth Schedule's adjudicatory structure to the test. The three instances that were chosen, are the political crises in Karnataka in 2019, Madhya Pradesh in 2020, and the Maharashtra Shiv Sena split in 2022–2024.

The major sources of data for study of each case were; Supreme Court rulings, Election Commission directives, contemporaneous legal commentary, and institutional reports—such as those released by PRS Legislative Research and the Vidhi Centre for Legal Policy. The more descriptive data on defection trends from 2016 to 2021 were provided by Association for Democratic Reforms (ADR), a nonpartisan organization that monitors elections. Each instance has been examined from four angles: (1) the defection strategy used; (2) the Speaker's or adjudicating authority's involvement and behaviour; (3) the type and result of judicial intervention; and (4) the implications for democratic accountability and government stability. The recurrent structural features in all three episodes were found after the analysis of The Discussion section's cross-case

Case Studies

Case 1: Karnataka (2019)

Thirteen months after the Janata Dal (Secular) and the Indian National Congress formed a coalition government in Karnataka in July 2019, several lawmakers, instead of publicly defecting, started submitting resignation (Wikipedia, 2025; Business Standard, 2019). Between the period of July 1 and July 6, there were twelve MLAs from the ruling coalition who tendered their resignations; for a total of about seventeen, several more followed in the days that followed. The protection for the rebel lawmakers were allegedly provided by state government due to the opposition Bharatiya Janata Party (BJP), when they journeyed to Mumbai, where they refused to meet with Congress officials (Wikipedia, 2025).

The crucial legal dispute concerned timing: the rebel MLAs petitioned the Supreme Court to force an immediate decision, while the resignations were refused right away by Speaker K. R. Ramesh Kumar, citing his constitutional duty under Article 190(3)(b) to confirm that they were voluntary and genuine (LiveLaw, 2019). Because of resignation and disqualification having different legal ramifications-there is a significant sequencing that a member who resigns to avoid some Tenth Schedule fines that apply to a member who is disqualified for defection. Since no whip could be effectively enforced against the rebel MLAs without their presence, the Supreme Court's interim order allowing them to abstain from the confidence vote without being forced to attend was criticized as essentially suspending the operation of the anti-defection law for the purposes of that vote. (Scroll.in, 2019).

Four days after the Kumaraswamy-led coalition government lost the confidence motion on July 22, 2019, B. S. Yediyurappa was sworn in as chief minister of a BJP government. After that, the Speaker disqualified seventeen MLAs and prohibited them from running for office until the assembly's mandate ended in 2023. The Supreme Court partially affirmed the Speaker's order in November 2019, upholding the disqualifications themselves but overturning the prohibition on running in subsequent elections, ruling that the Speaker lacked the authority to establish a set disqualification period (SCC Online, 2019). As a result, the seventeen MLAs were allowed to run in the December 2019 by-elections. The majority of them ended up doing all of this under the BJP flag, and after winning, there were a number of them who were reappointed as ministers.

A structural weakness was demonstrated as a result that functions which exists outside of the official disqualification process: lawmakers who are found to defect and assist in overthrowing a government may be "punished" with the label of disqualification but quickly re-legitimised through ministerial appointments and by-elections, with the disqualification acting as a transient annoyance, at most, rather than a significant deterrent.

Case 2: Madhya Pradesh (2020)

The long standing rivalry between Chief Minister Kamal Nath, Digvijaya Singh, and Jyotiraditya Scindia within the state Congress party was an even more direct cause of the Madhya Pradesh crisis in March 2020 (The Quint, 2020). Scindia, a well-known Congress leader, with 19 years of experience, on March 10, 2020, took resignation from the party due to, what his supporters claimed was, the Kamal Nath leadership's marginalization of him, including his rejection for a Rajya Sabha nomination (Outlook India, 2024). Almost around the same time, twenty-two Congress MLAs, which included six ministers and many Scindia loyalists, also submitted their resignations, expressing dissatisfaction with their leader's treatment towards them (VIA Mediation Centre, n.d.).

The legal strategy that was employed here, was structurally identical to that of Karnataka: the Resignation rather than official defection led to the Tenth Schedule's disqualification process circumvented. According to the Constitution, a speaker can only refuse to accept a resignation if there are grounds to suspect that it is not sincere or voluntary; and in the absence of such a determination, the speaker's ability to use the anti-defection clauses after resignations are submitted, is restricted (Oneindia News, 2020). The Tenth Schedule penalties were completely avoided by lawmakers once the Madhya Pradesh Speaker accepted their resignations; since they had officially left the legislature rather than crossing the floor. While still members, they could not be disqualified for defection.

On March 20, 2020, even before a planned floor test, Kamal Nath took resignation from being a chief minister, acknowledging that his government had lost a majority. Many of the twenty-two MLAs were

renominated as BJP candidates in the ensuing by-elections, and Scindia joined the BJP the next day and was rewarded with a Rajya Sabha seat (Outlook India, 2024). This pattern, which is frequently referred to as "Operation Lotus" in Indian political commentary, is described by the Vidhi Centre for Legal Policy (Sharma & Gupta, 2023) as proof that defections are motivated by both the opportunism of individual legislators and the inducement tactics of rival parties. This means that a law that solely targets the legislator's personal behaviour only addresses half of the causal mechanism causing defections.

Case 3: Maharashtra (2022–2024)

Of the three instances, the Maharashtra case is the most significant and drawn-out. Eknath Shinde, a prominent Shiv Sena leader at the time, and many other MLAs left the party in June 2022, eventually gaining the backing of 37 of the party's 55 lawmakers (LiveLaw, 2024). In contrast to the Karnataka and Madhya Pradesh cases, Uddhav Thackeray resigned without a floor test after the Supreme Court refused to stay a gubernatorially ordered confidence vote, while the Shinde faction did not resign from the legislature. Instead, it claimed to constitute the legitimate Shiv Sena itself and allied with the BJP to form a new government with Shinde as chief minister (PWOlyIAS, 2025).

Which group was the "real" Shiv Sena for the Tenth Schedule? This was the main legal question, which was definitional rather than procedural. In *Subhash Desai v. Principal Secretary, Governor of Maharashtra*, the Supreme Court's Constitution Bench ruled in May 2023 that a "legislature party" has no independent existence apart from the political party organization and that the 91st Amendment's removal of the split exemption meant that a legislative majority by itself could not support the survival of a breakaway faction (LiveLaw, 2024). Rahul Narwekar, the speaker of the Maharashtra Assembly, was instructed by the court to decide the opposing disqualification petitions submitted by both groups.

Speaker Narwekar said in January 2024 that the Shinde group was the "real" Shiv Sena, mainly based on the fact that when the factions separated in June 2022, the Shinde faction held an "overwhelming majority" of thirty-seven out of fifty-five MLAs (ThePrint, 2025). The Supreme Court's own 2023 ruling, which specifically cautioned that the Speaker "must not base their decision... on a blind appreciation of which group possesses a majority" and stressed that the party's organizational constitution and leadership structure outside the legislature were the pertinent considerations, was directly contradicted by this decision, according to legal commentators (ThePrint, 2025; Inkl, 2024). According to a thorough analysis, the Speaker had completely overreached his authority because the Election Commission of India is authorized by the Symbols Order to decide which faction is the "real" party for the party symbol and name, not the Speaker under the Tenth Schedule, whose role is restricted to identifying which party a legislator has defected from (Inkl, 2024).

The Maharashtra case thus exemplifies a third unique method of circumvention: the Shinde faction used sheer numerical strength in conjunction with a politically sympathetic Speaker to claim the mantle of legitimacy itself, turning the law's majoritarian assumptions against its anti-defection purpose, rather than depending on individual resignation (Madhya Pradesh) or accepting eventual disqualification as a tolerable cost (Karnataka).

Discussion: Cross-Case Patterns and Empirical Implications

As it is clear that the legal "split" exception has been closed completely, yet, the Karnataka, Madhya Pradesh, and Maharashtra incidents show three different but connected ways which has been evaded by the post-2003 Tenth Schedule.

Amongst them, the first one, the resignation route, which is employed in Madhya Pradesh and Karnataka, is advantageous of the legal distinction between defection disqualification and voluntary resignation. Engineering a government's collapse by lawmakers has been enabled by a coordinated mass resignation, without ever activating the disqualification machinery, that is intended to prevent precisely this outcome, as a member voting against the whip or staying within the party while engaging in anti-party conduct is the only thing that triggers the Tenth Schedule. This is in accordance with the empirical finding that it has been done successfully by a significant portion of lawmakers who defected and recontested elections between 2016 and 2021, with the BJP disproportionately benefiting (Outlook India, 2024; Sharma & Gupta, 2023). The Association for Democratic Reforms reported this finding and referenced it in the Vidhi Centre's analysis.

The Second one, the disqualify- and- recontest route, which was exemplified by Karnataka, demonstrates that defecting legislators face, at most, a brief disqualification before being free to recontest, frequently successfully, under the banner of their new party, even in cases where disqualification is successfully imposed,. This happened because of the Supreme Court's insistence—correctly, as a matter of electoral rights—that disqualification cannot be extended for a fixed term beyond the immediate vacancy. As a result, rather than a long-term penalty, the law's deterrence power is made limited to a temporary annoyance.

The Third and last one, as Maharashtra demonstrated that the majoritarian capture route shows that if a defecting faction is sufficiently large, it can try to take over the identity of the original party itself, leading to turn what the Tenth Schedule views as defection into a contentious issue of party leadership which a Speaker must decide by a who is rarely institutionally independent of the ruling coalition. "The trend of the Speaker acting against the constitutional duty of being neutral is growing significantly," as the 2019 Karnataka ruling itself noted (SCC Online, 2019), and the Maharashtra case indicates that this trend has only, if anything, got worsened.

All the three cases mentioned above, share a common structural diagnosis that is, the Speaker's office faces an institutional conflict of interest which is unresolvable because the Speaker is both the quasi-judicial arbiter of disqualification petitions and a sitting member of a political party too, usually the ruling party. Although the Supreme Court itself suggested in 2020 that Parliament should consider giving adjudicatory authority to an independent tribunal instead of the Speaker (LiveLaw, 2024), the persistence of Speaker-driven disputes in three different states and three different ruling coalitions between 2019 and 2024 offers compelling empirical evidence that the issue is structural rather than incidental.

Adjudicatory delay is the subject of a second pattern. During an ongoing crisis of confidence, the Supreme Court in Karnataka spent more than two weeks debating the timing of resignation vs. disqualification procedures. In Maharashtra, the Shinde-led government had been in power for a year and a half by the time of the Speaker's January 2024 ruling, more than eighteen months after the June 2022 split. Therefore, any subsequent disqualification as a check on the formation of that government was essentially moot. The scholarly advice that the law include binding adjudication timelines is supported by this empirical pattern (IJLSSS, 2024).

Lastly, the three cases together support the empirical assertion made in TIJER's (2023) study that the law's disciplinary mechanism has resulted in a secondary, less obvious cost: a deterioration in intra-party

democracy. In each instance, the Shinde faction's dissatisfaction with the Thackeray leadership's response and Scindia's exclusion from a Rajya Sabha candidacy were the root of the defecting faction's perceived marginalization inside the party's internal decision-making process. The Tenth Schedule eliminates internal dissent as a practical means of resolving such grievances by severely punishing any legislator who acts independently of the central party leadership. As a result, one of the few remaining ways for a legislative faction to confront entrenched party leadership is through full-scale, externally orchestrated defection. In this way, the empirical impact of the law may be somewhat at odds with its original intent: instead of upholding the integrity of the electoral mandate, it may have limited the room for valid internal contestation to the point where contestation is more likely to result in complete defection than internal reform.

Conclusion

Using three post-2003 case studies—Karnataka (2019), Madhya Pradesh (2020), and Maharashtra (2022–2024)—this research has investigated the empirical effects of India's Anti-Defection Law. The evidence indicates that although the Tenth Schedule has probably lessened the kind of unplanned, individual floor-crossing that typified the 1960s and 1970s, it has not stopped and may have even encouraged large-scale, carefully planned defections that circumvent its formal disqualification provisions through mass resignation, brief disqualification followed by recontest, or majoritarian claims to party identity. The primary structural flaw in all three cases is the Speaker's combined political and adjudicatory role, which is made worse by the lack of legally obligatory adjudication timetables.

The creation of an independent tribunal separate from the Speaker's office to decide disqualification petitions, the imposition of statutory timelines for such adjudication, and a reevaluation of whether voluntary mass resignation should be treated, for Tenth Schedule purposes, as functionally equivalent to defection when it is timed to engineer a change of government are all recommendations for institutional reform that these findings empirically support. The future research using a larger sample of state-level defection episodes in conjunction with systematic quantitative tracking of disqualification outcomes and post-defection electoral success rates can help in further strengthening the empirical basis for such reform. This would also be helpful in developing the kind of accountability metrics which current scholarship identifies as currently lacking (Suresh, 2025).

In the end, in order to safeguard the election mandate's integrity from the grave danger of opportunistic floor-crossing, the Anti-Defection Law was created. The cases which have been discussed here indicate that this protection functions unevenly at present as it discourages the lone defector while ignoring the coordinated at large, well-funded defection of a whole legislative faction, which is exactly the situation that is most likely to overturn an electoral mandate on a large scale.

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