

---

## CRIME AGAINST CORPSES: A CRIMINOLOGICAL ANALYSIS OF THE ACT OF NECROPHILIA IN INDIA

---

Aryan, Research Scholar (LLM), LPU School of Law, Lovely Professional University,  
Phagwara (PB)<sup>1</sup>

Under the Guidance of  
Dr. Anand Pawar, Professor & Senior Dean, LPU School of Law,  
Lovely Professional University, Phagwara (PB)

### ABSTRACT

Necrophilia is an act of having sex with the body of the deceased person, so as to fulfil the sexual gratification. It usually involves sexual assault on the dead body. The fact that the deceased cannot consent, makes this act non-consensual. It ultimately violates the dignity of the deceased person. Most of the psychological experts considered it as a mental illness and often classified it as ICD10 in the Diagnostic and Statistical Manual (DSM) but still this act requires an in-depth study<sup>2</sup>. Various countries have enacted laws in order to punish such act. But in India there is no law dealing with such an act. The Section 301 of Bhartiya Nayaya Sanhita, 2023 punishes for trespassing on burial places but is not sufficient to penalise the act of Necrophilia. At various moments the Indian Courts had highlighted the need for the legislation dealing with such problem but till today no step has been taken by the Parliament. This research will focus on the criminological analysis of such act with the understanding of various aspects including the need for legislation, in India.

**Keywords:** Necrophilia, Necrophiliac, Paraphilia, Crime, Indian Penal Code, 1860, Bhartiya Nayaya Sanhita, 2023, The Protection of Children from Sexual Offences Act, 2012, Sexual Intercourse, Corpse.

---

<sup>1</sup> Aryan, Research Scholar (LLM), LPU School of Law, Lovely Professional University, Phagwara (PB)

<sup>2</sup> Kumar. P., Rathee. S., & Gupta. R. (2019). Necrophilia: An understanding. *International Journal of Indian Psychology*, 7(2), 607-616. DIP: 18-01.073/20190702, DOI: 10.25215/0702.073.

**INTRODUCTION:-**

The term Necrophilia is derived the Greek words “nekros which means dead and “philia” means love, which means sort of sexual attraction and affection with the deceased human bodies. It is one of the paraphilia and is often considered as a psychological disorder but this does not exempts the person committing Necrophilia to apprehend from the legal actions to be taken against him for such an Act. This is a disturbing phenomenon which affects the dignity of the dead bodies. The Hon‘ble Supreme Court in *Parmanand Katara V. Union of India*<sup>3</sup> held that the right to live life with dignity is an inalienable fundamental right which persists even after the death of the individual. The dead body of the person must be treated with respect and dignity. Further in *Ashray Adhikhar Abhiyan V. Union of India*<sup>4</sup> the Hon‘ble Court held that the Article 21 of the Constitution provides for decent burial of the dead body of persons including the homeless, in accordance with their religious beliefs. Similarly, in *Ramji Singh & Mujeeb Bhai V. State of Uttar Pradesh*<sup>5</sup>, the Hon‘ble Allahabad High Court held that Article 21 provides that the deceased individuals shall be treated with the same dignity and respect to which they were entitled during their lifetime. But beside these judicial precedents, the Necrophilia cases are going unreported and the accused committing such acts are getting acquittal only on the ground of lack of enacted law provided for such act. The reason might be that it’s not a popular crime, due to which the law is silent about it. The research will discuss this all in details.

**STATEMENT OF PROBLEM:-**

As earlier stated, Necrophilia is a rare phenomenon and its cases are quietly less but that does not mean that it has no existence. There were various incidents in our country where Necrophilia has been committed by the person. But the problem is that there are no laws in India to deal with this phenomenon. So, this research wills emphasis on the need of enacting a law dealing with such an act.

**HISTORY:-**

In the ancient history of India, we can say that the Necrophilia is not common and the incidents

---

<sup>3</sup> AIR 1989 SC 2039.

<sup>4</sup> 2002 (2) SCC 27.

<sup>5</sup> 2009 (5) Alj 376.

of such act cannot be traced in those texts. The major reason behind it is the ritual of Hindu religion under which the body of the dead person is usually set on fire after the death and then ended with immersion of ashes into Holy River. It is believed that the burning of the dead body and later on the immersion of ashes into Holy River would leads to the salvation of the deceased person. However, when we come to global context we can find out that usually the sailors who return the corpses to their home country were often being accused of Necrophilia. It is due to the long isolated travel they have with the corpses which encourages them to commit such an act<sup>6</sup>. In the Greek history, we can find the painting of Moches i.e. “Greek of the Andes” which depicts the sex between dead people<sup>7</sup>. In the Egyptian history we can find out that there was a tradition to let the women’s body rot for some days so as to preserve it and to protect it from the Necrophilia. The king Herod had committed Necrophilia with his wife Marianne for seven years after committing her murder<sup>8 9</sup>. In Roman history also there is not much sufficient evidence supporting the existence of such an act but some historical accounts suggests that it was not entirely unknown.<sup>10</sup> In Italian history also with the moral collapse, the literature was replete with sexual references which include necrophilia mentioned in the poem Orlando Innamorato by Matteo Maria Boiardo published in 1483<sup>11</sup>. In Chinese history the Xianbei emperor of Yan State i.e. Muraong Xi had committed necrophilia with his beloved empress Fu Xunying<sup>12</sup>. Beside this even the Necrophilia can also be evident from the tribal practices of some of the tribes. So, the act of Necrophilia is not common but at the same time it has some sort of existence also. It is a rare phenomenon. Still its roots can be traced back in the history.

#### ❖ CLASSIFICATION:-

For classification, the work done by Mr. Anil Aggrawal, Forensic Psychologist is outstanding as he provides a detailed classification and introduces ten-tier classification of Necrophilia

---

<sup>6</sup> “Necrophilia: Loving the Dead written by Sharol Steven published in International Journal of Engineering, Management and Humanities (IJEMH) (Volume 4) (Issue 3) (May-June) at pp:88-96.

<sup>7</sup> Atulya S Menon, Nitin Nishad. Necrophilia: A Cruelty Towards Corpse-Review Analysis. Indian Journal of Forensic Medicine and Toxicology/Volume 18 No. 3, July – September 2024.

<sup>8</sup> Huber Von H: Nekrophilie. Kriminalistik 16:564-8, 1962.

<sup>9</sup> Jones E: On the Nightmare. New York, Liveright, 1931, pp: 109-112.

<sup>10</sup> From Silence to Sanction: Comparative Analysis of Necrophilia Laws in India and Other Countries by Hifajatali Sayyed & Jyotsana Singh published by Taylor & Francis (<https://doi.org/10.1080/23311886.2024.2437700>).

<sup>11</sup> Davidson, Nicholas; Dean, Trevor; Lowe, K. J. P. (1994). Crime, Society and the Law in Renaissance Italy. pp. 74-98. DOI: 10.1017/CBO9780511523410.006. ISBN 978-0-511-52341-0.

<sup>12</sup> Luan Pao-Chun (1994). “The Corpse-Raping Emperor”. Tales about Chinese Emperors: Their Wild and Wise Ways. Hai Feng Publishing Company. Pp: 148-?.

with division of it into classes<sup>13</sup>. The author had further provided his own, detailed explanation of such classifications, as follows:-

CLASS	NAME	CHARACTERISTICS
I	Role Players Necrophiliacs	These types of people are the role players and get sexually aroused, not when the partner is dead but when their partner pretends to be dead while having sexual activity. In this, one of the partner pretends to be dead and the Necrophiliac enjoys having sex by imagining that he is having sex with the dead body of his partner but in reality it is just a role play with the partner. It is merely a role playing fantasy. Some authors have often considered it as Pseudo Necrophilia.
II	Romantic Necrophiliacs	These types of people involve the lovers who are in a strong attachment with their partners and when their partner died they continue to have sexual relationship with their dead body. They got too much attached that they do not care about the dead body of their partner and just attach to their body or even have sex with the body. This would relieve them from their loneliness and overcomes their feeling of separation from their partner, taking example of emperor Muraong Xi <sup>14</sup> , as earlier mentioned.

<sup>13</sup> “A New Classification of Necrophilia written by Anil Aggrawal published in Journal of Forensic and Legal Medicine (Aug-2009) 16(6):316-20.

<sup>14</sup> Ibid.

III	Necrophiliac Fantasizers	These types of people generally fantasize about having sexual relationship with the dead's but in reality they do not physically interact with the corpses. Sometimes even the presence of the dead body may be sufficient for them to get an arousal. They are usually mental fantasizers and nothing more than that. But when we try to understand the criminal psychology it is always the mentality which later on turns into a physical act, these people cannot be taken in a lighter manner.
IV	Tactile Necrophiliacs	These types of people are one stage ahead from the Necrophiliac Fantasizers as they got arousal not by only fantasizing or merely being in the presence of the dead body but by moving one step ahead i.e. by touching the dead body of the person. They also do not involve in a sexual relationship with the dead but tries to touch the corpse to get an orgasm.
V	Fetishistic Necrophiliacs	These types of people tend to cut the body parts of the dead person so as to preserve them for their sexual arousal. They do not cut the parts out of affection for the deceased but only for the sole purpose of their arousal. They also do not engage in sexual relationship with the deceased.
VI	Necromutilomaniacs	These types of people commit much aggravating act then the people belonging to earlier classes. They usually mutilates the dead body without engaging in a sexual intercourse and try to get an erotic please by mutilating and masturbating simultaneously.

VII	Opportunistic Necrophiliacs	<p>These types of people are opportunistic. They usually do not have much interest in Necrophiliac activity but if they got an opportunity to be surrounded by the dead body, then they took benefit of that opportunity in an absolute manner and have sexual intercourse with the dead body. These people generally have a no-no attitude towards the Necrophiliac act but they might have some sort of positive attitude for such an act. When these people are alone with the dead body and they are fully ensure that now they will not disturbed for a sufficient time, then they took the opportunity to satisfy their urge to have sexual intercourse with the dead.</p>
VIII	Regular Necrophiliacs	<p>These types of people are quiet common. They are habitual to have sexual intercourse with the dead. They often do not like having sex with living person; they are much inclined to have sex with the dead's. People working in the mortuary or graveyards are the prime example of this as these people are often surrounded by the dead bodies and have an easy access to have sexual intercourse with the dead's.</p>
IX	Homicidal Necrophiliacs	<p>These types of people are dangerous as they commit murder of people only to have sexual intercourse with them. They are usually psycho killers who firstly try to kill the victim and then commit sexual intercourse with the dead body of victim.</p>

X	Exclusive Necrophiliacs	These types of people are those who have an exclusive interest to have sexual intercourse with the dead bodies only. They are not able to have sexual intercourse with any living person or they have hesitation in having sexual relationship with the living person or they want complete autonomy over the partner while having sexual intercourse. So, they find much interest in the dead bodies, as they can perform any sexual act over the dead body. So, they find dead bodies much attractive for having sexual intercourse.
---	-------------------------	--

### CASES IN INDIA:-

A. In 2006, The “Nithari” Case or Noida Serial Murders was a series of murders committed by Moninder Singh Pandher with his servant Surinder Koli. The matter came out when a resident claimed to found a decomposed hand, as the residents were already living under a suspicion due to the missing of large number of youngsters from the village Nithari. There was large number of reported missing in the village from 2003 to 2005. Around 17 skeletons were discovered out of which 15 were identified. The missing torsos of the body and such number of killing also raise suspicion that these killings were motivated by illicit trade in human organs. As per police there were at least 31 child victims<sup>15</sup>. In his final confession, Surinder Koli described how he lured the 16 victims into the residence and thereby brutally murdered them, having sexual intercourse with their dead bodies, chopping and consuming their parts of body and finally to threw the dead bodies<sup>16</sup>. However, on 16<sup>th</sup> October of 2023, after 17 years from the discovery of crime, both the accused were acquitted of all the charges against them, after an appeal filed by them in the Allahabad High Court on the ground of lack of evidence other than the confessions of accused<sup>17</sup>. The Hon’ble Court held that “the

<sup>15</sup> “Organ trade twist to Noida horror, body parts missing” published in Sify News on 02-01-2007 (Wikipedia).

<sup>16</sup> “A Study on 2006 Noida Serial Murder: Nithari Hatyakand with Special Reference to the Psychology of the accused published in legalserviceindia.com (<https://www.legalserviceindia.com/legal/article-11680-study-on2006-noida-serial-murder0nithari-hatykand-with-special-reference-to-the-psychology-of-the-accused.html>).

<sup>17</sup> “Nithari serial killings case: Citing shoddy probe, Allahabad HC acquits Koli, Pandher” by Ishita Mishra published in The Hindu (Wikipedia).

prosecution has failed to prove the guilt of the accused beyond the reasonable doubt, on the settled parameters of a case based on circumstantial evidence.

- B.** In 2010, another incident came into light in Chembur Panchratna Housing Society, Mumbai, Maharashtra where a 24 year old accused Nagesh Ghopal had committed murder of 14 year old girl and there after commits rape with her dead body. He firstly requested her to get him milk and then later strangled her with his hands, dragged her into bathroom, put her head in bucket filled with water. After observing that the girl is still breathing, he smashed her head with a wooden rod and finally murdered her. It was a sexual urge which he could not resist and tries to find out a soft victim to commit such act. The Session Judge SR Malpani Pawar sentenced the accused for life imprisonment. However, the mother of the victim was unhappy and demands for more strict punishment i.e. capital sentence.<sup>18 19</sup>.
- C.** In 2015, another incident occurred in Javanahalli, Kasaba Hobli, District Tamakuru, a 21 year old woman pursuing computer classes in Badavanahalli was being murdered and thereafter being raped by the accused Rangaraju on 25<sup>th</sup> June of 2015. The accused was being charged with Section 302 and 376 of the Indian Penal Code, 1860. He was sentenced with an imprisonment for life with a fine of Rs 50,000/- or two years of simple imprisonment as an alternative under Section 302 and ten years rigorous imprisonment sentence with a fine of Rs 25,000/- or one year simple imprisonment as an alternative under Section 376. In an appeal before the Hon'ble Karnataka High Court. The Hon'ble Court affirmed the decision of the Session Court on 302 IPC but reversed the finding on the charge of Section 376. The Hon'ble Court concluded that the offence of rape cannot be established when the victim is deceased and the offence has been committed with her corpse<sup>20</sup>.
- D.** In 2015, another incident came into light in Vizhinjam, District Thiruvananthapuram, Kerala where a 9 year old child was being murdered by a 17 year old accused. The reason behind this act was the wanting of the accused to replicate an act he watched in

---

<sup>18</sup> "Life Term for Chembur Necrophiliac" written by Anand Holla published in Mumbai Mirror on 10-12-2010 (<https://mumbaimirror.indiatimes.com/mumbai/other/life-term-for-chembur-necrophiliac/articleshow/16081308.html>).

<sup>19</sup> "Man charged of Necrophilia arrested" written by PTI published in Times of India on 16-01-2010 (<https://timesofindia.com/city/mumbai/man-charged-of-necrophilia-arrested/articleshow/543462.cms>).

<sup>20</sup>



pornographic video. The accused tries to make sexual advances towards the victim but on his refusal the accused brutally murdered him with an empty liquor bottle. The police officials indicate that the post mortem report proves that the victim was also subjected to sodomy, after being murdered by the accused. This forms an act of Necrophilia, committed by a minor<sup>21 22</sup>.

E. In 2020, another incident came into light at Nalla Sopara, District Palghar, Maharashtra, where the accused (shopkeeper) engaged in heated argument with a 32 year old woman over some household items. The accused became so aggressive that he assaulted the woman and dragged her behind his shop, strangled her and slit her neck with a knife. It was reported in Autopsy report that the accused has also sexually assaulted her after murder. The accused confessed that he had sexual intercourse with the corpse of the victim<sup>23</sup>.

F. In 2024, another incident came into light at Khaknar, District Burhanpur, Madhya Pradesh, where a 25 year old man, identified as Nilesh, was arrested on charges of Necrophilia with the woman's corpse at the Khaknar Community Health Center (CHC) on 18-04-2024. The facts were that the accused enters in the hospital premises as an attendant carrying food for the patient admitted and then he came across outside post-mortem room where the woman corpse was kept on stretcher. He start molesting the corpse and later on dragging the body away and few minutes later he drag the body back and leaves it on the ground and flees. It was alleged that the nursing staff was aware of the fact but the matter was being suppressed by the department for months. The police had registered the case under Section 297 of the Indian Penal Code, 1860<sup>24</sup>.

---

<sup>21</sup> "Thiruvananthapuram shaken over teenager who killed boy, then had sex with the dead body" written by TNM Staff published in The News Minute on 25-08-2015

(<https://www.thenewsminute.com/kerala/thiruvananthapuram-shaken-over-teenager-who-killed-boy-then-had-sex-dead-body-33662>).

<sup>22</sup> "Kerala" Teenager was aware he had sex with a dead body, say officials" written by Sandra Marina Fernandes published in Oneindia on 26-08-2015 (<https://www.oneindia.com/thiruvananthapuram/kerala/teenager-kills-minor-dead-body-murder-crime-1849804.html>).

<sup>23</sup> "Palghar stunned by Necrophilia, a man raped woman's corpse" written by Tribune Web Desk in The Tribune on 04-07-2020 (<https://www.google.com/amp/s/www.tribuneindia.com/news/nation/palghar-stunned-by-necrophilia-a-man-raped-wome=ans-corpse-108480/amp>).

<sup>24</sup> "Man arrested on charges of Necrophilia in Burhanpur" written by TOI published in The Times of India on 09-10-2025 (<https://timesofindia.indiatimes.com/city/indore/man-arrested-on-charges-of-necrophilia-inburhanpur/articleshow/124399100.cms>).

**G.** In 2024, another incident came into light at Udvada Railway Station, Surat, Gujarat, where a 30 year old man, identified as Rahul Jat @ Bholu Karmvir Ishwar Jat was alleged with murder as well as rape of 19 year old woman. The accused had murdered the woman and then kept her dead body near the bushes, keeping his luggage nearby with intent to return back again, the accused came back after some time and then have sexual intercourse with the corpse of the victim. It was reported that he had also confessed his involvement in other four murders. The accused seems to be a habitual offender<sup>25</sup>.

**H.** In 2025, another incident came into light at District Khandwa, Madhya Pradesh, where the graves of five women and a man were found to be desecrated at two cemeteries which alarmed their families. The FIR has been registered under Section 301 of Bhartiya Nayay Sanhita, 2023 and the police is investigating the matter with multiple angles. However, the police find a strong possibility of occult practices rather than Necrophilia. But this incident raises an alarm regarding the safety and dignity of the corpses<sup>26</sup>.

## LEGAL PERSPECTIVES IN INDIA:-

If one tries to find out any legal provisions dealing with such issue, he may come to know that there is no any definite law in India which deals with the Necrophilia. In India, the accused committing Necrophilia were usually charged with the following Sections, but still they were later on being acquitted by the Courts due to weakness of these provisions to bring such act under their scope. The problem came in front is as follows:-

---

<sup>25</sup> Gujarat Girl Rape-Murder: ‘Serial Killer returned to murder scene to commit Necrophilia’ written by TNN published in The Times of India on 28-11-2024 ([https://www.google.com/amp/s/timesofindia.indiatimes.com/city/surat/alleged-serial-killer-returns-to-crimescene-for-necrophilia-shocking-details-emerge/amp\\_articleshow/115741697.cms](https://www.google.com/amp/s/timesofindia.indiatimes.com/city/surat/alleged-serial-killer-returns-to-crimescene-for-necrophilia-shocking-details-emerge/amp_articleshow/115741697.cms)).

<sup>26</sup> “Graves Desecrated in Madhya Pradesh’s Khandwa, Police Suspect Occult Link” written by Karishma Kotwal published in The Times of India on 25-05-2025 ([https://www.google.com/amp/s/timesofindia.indiatimes.com/city/indore/graves/desecrated-in-khandwa-police-suspect-occult-link/amp\\_articleshow/121385646.cms](https://www.google.com/amp/s/timesofindia.indiatimes.com/city/indore/graves/desecrated-in-khandwa-police-suspect-occult-link/amp_articleshow/121385646.cms)).

**A. Bhartiya Nayay Sanhita, 2023:-**

- i. **Section 301 (297 IPC)<sup>27</sup>**:- The provision punishes if the accused offers any indignity to the human corpse but the major problem while charging a Necrophiliac with this provision is that there must be an intention to wound the feeling of any person or insulting the religion of such person or the knowledge that the feeling of such person is likely to be wounded or insult would be caused to his religion. This section usually maintains the sanctity of the burial places and particularly deals with religious beliefs and feelings of the person. The Necrophiliacs have an intention to have sexual intercourse or to get some sort of sexual arousal from the corpse. They have nothing to do with the religious feelings, etc. Their sole intention is to attain sexual gratification from the corpses by involving in an sexual activity with them.
- ii. **Section 63 (375 IPC)<sup>28</sup>**:- The definition of rape under Section 63 of the BNS is sufficient to include Necrophilia but the problem is that rape can only be

<sup>27</sup> Trespassing on burial places, etc:- Whoever, with the intention of wounding the feelings of any person, or of insulting the religion of any person, or with the knowledge that the feelings of any person are likely to be wounded, or that the religion of any person is likely to be insulted thereby, commits any trespass in any place of worship or on any place of sepulchre, or any place set apart for the performance of funeral rites or as a depository for the remains of the dead, or offers any indignity to any human corpse, or causes disturbance to any persons assembled for the performance of funeral ceremonies, shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

<sup>28</sup> 63. A man is said to commit "rape" if he—

- (a) penetrates his penis, to any extent, into the vagina, mouth, urethra or anus of a woman or makes her to do so with him or any other person; or
- (b) inserts, to any extent, any object or a part of the body, not being the penis, into the vagina, the urethra or anus of a woman or makes her to do so with him or any other person; or
- (c) manipulates any part of the body of a woman so as to cause penetration into the vagina, urethra, anus or any part of body of such woman or makes her to do so with him or any other person; or
- (d) applies his mouth to the vagina, anus, urethra of a woman or makes her to do so with him or any other person, Under the circumstances falling under any of the following seven descriptions:— (i) against her will; (ii) without her consent; (iii) with her consent, when her consent has been obtained by putting her or any person in whom she is interested, in fear of death or of hurt; (iv) with her consent, when the man knows that he is not her husband and that her consent is given because she believes that he is another man to whom she is or believes herself to be lawfully married; (v) with her consent when, at the time of giving such consent, by reason of unsoundness of mind or intoxication or the administration by him personally or through another of any stupefying or unwholesome substance, she is unable to understand the nature and consequences of that to which she gives consent; (vi) with or without her consent, when she is under eighteen years of age; (vii) when she is unable to communicate consent.

Explanation 1.—For the purposes of this section, "vagina" shall also include labia majora.

Explanation 2.—Consent means an unequivocal voluntary agreement when the woman by words, gestures or any form of verbal or non-verbal communication, communicates willingness to participate in the specific sexual act: Provided that a woman who does not physically resist to the act of penetration shall not by the reason only of that fact, be regarded as consenting to the sexual activity.

Exception 1.—A medical procedure or intervention shall not constitute rape.

constituted with the living person. For this we would have to deeply understand the Judicial Precedent. As discussed earlier Rangaraju @ Vajapeyi V. State of Karnataka<sup>29</sup>, in this case a 21 year old woman pursuing computer classes in Badavanahalli was being murdered and thereafter being raped by the accused Rangaraju on 25th June of 2015. The Session Court convicts him but in appeal in the Hon'ble Karnataka High Court, the accused has been partly convicted as his sentence for murder was affirmed but the offence as to rape after death i.e. Necrophilia was overruled and the court highlights that the rape can only be done with the living person and the dead body cannot be considered as human or person. The earlier provision of IPC i.e. Section 377 is meant to protect living individuals from un-natural sexual offences but is not applicable to the lifeless bodies. The offence of unnatural sex cannot be established when the person is dead. The Hon'ble High Court highlights the need to amend the laws or specially Section 377 of the IPC, so as to bring the act of Necrophilia into the ambit of Penal Laws. Later on in State of Karnataka V. Rangaraju @ Vajapeyi<sup>30</sup>, the Hon'ble Supreme Court also affirmed the decision of the Hon'ble Karnataka High Court and held that "since Necrophilia, not being an offence, the respondent could not have been convicted for rape. Since nothing has been shown to this Court that Necrophilia is an offence". However, now the new criminal laws has been introduced, one of them i.e. Bhartiya Nayay Sanhita, 2023 replacing the Indian Penal Code, 1860. Still it lacks to make Necrophilia, an offence. Moreover, the earlier Section 377 of IPC dealing with unnatural offences has also been entirely omitted in BNS. It is to be noted that in Navtej Singh Johar v. Union of India<sup>31</sup> the Hon'ble Supreme Court had only partially decriminalised the Section 377 and reserve the rest of the provision for non-consensual unnatural sex between humans as well as sexual intercourse between human and animals. The Parliament had completely ignored this fact. Here, we are discussing about Necrophilia but even non-consensual unnatural sex is now not punishable. So, there is a wider gap being left by the Parliament. Instead of enacting wider laws, the parliament narrows downs their scope.

---

Exception 2.—Sexual intercourse or sexual acts by a man with his own wife, the wife not being under eighteen years of age, is not rape. 29 Ibid.

<sup>29</sup> Ibid.

<sup>30</sup> Special Leave to Appeal (Crl.) No. 5403/2024.

<sup>31</sup> 2018 INSC 790.

Recently, the Hon'ble Andhra Pradesh High Court had refused to grant bail to a man for brutally murdering his employer's wife and there after committing rape with her dead body. The Court held that the conduct of accused was 'monstrous' amounting to 'outrageous criminality'<sup>32</sup>.

**B. Protection of Children from Sexual Offences Act, 2013:-** The provisions under POCSO provides for the punishment of Penetrative sexual assault, Aggravated penetrative sexual assault, Sexual Assault, Aggravated sexual assault, Sexual harassment as well as the using the child for pornographic purposes but it lacks in proving safe guard to the dead body of the children. Under this law also the problem remains same that the offences can only be punishable if the child is living. In case of sexual intercourse with the corpse of a child, the POCSO shall have no applicability. In, Neelkanth Nagesh V. State of Chhattisgarh<sup>33</sup>, the Hon'ble Chhattisgarh High Court re-affirms the acquittal of the accused under Section 376 (3) of IPC & Section 6 of POCSO and held that "Rape of dead body is horrendous but not rape since the victim needed to be alive for such conviction". In another case, Kedukhoyi V. State of Nagaland<sup>34</sup>, the Hon'ble Gauhati High Court, while hearing the matter of rape with dead body of 9 year old girl, states that "Be that as it may, since we are concerned with whether based on the confession and admission of the charged offences, the accused can be convicted and sentenced to life imprisonment, we may not require to delve into the ingredients of rape on the dead body.

## LEGAL PERSPECTIVES IN VARIOUS OTHER COUNTRIES:

**A. United States of America:-** In USA, there is no any federal law dealing with such act but various states have their own laws as to this matter. Some of them are mentioned below:-

STATE	PUNISHMENT

<sup>32</sup> Nayan Biswas V. State of Andhra Pradesh (APHC010286002025) (2025).

<sup>33</sup> 2024 SCC OnLine Chh 13078.

<sup>34</sup> CRL.A(J)/10/2022.

Alabama	Punishable under Class ‘C’ (Felony) as “Abuse of corpse” <sup>35</sup>
Alaska	Punishable under Class ‘A’ (Misdemeanour) as “Misconduct involving a corpse” <sup>36</sup>
Arizona	Punishable under Class ‘4’ (Felony) as “Crimes against the dead” <sup>37</sup>
Arkansas	Punishable under Class ‘C’ Felony as “Abuse of a Corpse” <sup>38</sup>
California	Punishable under Felony as under Section 7052 <sup>39</sup>
Colorado	Punishable under Class ‘6’ Felony as “Abuse of a corpse” <sup>40</sup>
Connecticut	Punishable under Class ‘A’ Misdemeanour or Class ‘D’ Felony (if victim is under sixteen years of age) as “Sexual assault in the fourth degree” <sup>41</sup>
Delaware	Punishable under Class ‘A’ Misdemeanour as “Abusing a corpse” <sup>42</sup>
Florida	Punishable under Second Degree Felony as “Abuse of a dead human body” <sup>43</sup>

<sup>35</sup> <https://law.justia.com/codes/alabama/title-13a/chapter-11/article-1/section-13a-11-13/>.

<sup>36</sup> <https://law.justia.com/codes/alaska/1993/title-11/chapter-11-61/section-11-61-130/>.

<sup>37</sup> <https://www.azleg.gov/ars/32/01364.htm>.

<sup>38</sup> <https://law.justia.com/codes/arkansas/title-5/subtitle-6/chapter-60/subchapter-1/section-5-60-101/>.

<sup>39</sup> CA Health & Safety Code §7054 (2024).

<sup>40</sup> <https://law.justia.com/codes/colorado/title-18/article-13/section-18-13-101/>.

<sup>41</sup> <https://law.justia.com/codes/connecticut/title-53a/chapter-952/section-53a-73a/>.

<sup>42</sup> <https://delcode.delaware.gov/title11/c005/sc07/index.html>.

<sup>43</sup> <https://codes.findlaw.com/fl/title-xlvi-crimes/fl-st-sect-872-06/>.

Georgia	Punishable under Felony as “Necrophilia” <sup>44</sup>
Hawaii	Punishable under Misdemeanour as “Abuse of a corpse” <sup>45</sup>
Idaho	Punishable under Misdemeanour as “Desecration of grave, cemetery, headstone or place of burial prohibited as well” <sup>46</sup> as under Felony as “Unlawful removal of human remains, malice or intent to sell” <sup>47</sup>
Illinois	Punishable under Class ‘2’ Felony as “Abuse of a corpse” <sup>48</sup>
Indiana	Punishable under Level ‘6’ Felony as “Abuse of Corpse” <sup>49</sup>
Iowa	Punishable under Class ‘D’ Felony as “Sexual abuse of a corpse” <sup>50</sup>
Kansas	Punishable under Class A Misdemeanour as “Criminal desecration” <sup>51</sup>
Kentucky	Punishable under Class ‘D’ Felony as “Abuse of a corpse” <sup>52</sup>
Louisiana	Punishable under Misdemeanour as “Desecration of graves” <sup>53</sup>

<sup>44</sup> <https://law.justia.com/codes/georgia/title-16/chapter-6/section-16-6-7/>.

<sup>45</sup> [https://capitol.hawaii.gov/hrscurrent/vol14\\_ch0701-0853/hrs\\_0711?hrs\\_0711-1108.htm](https://capitol.hawaii.gov/hrscurrent/vol14_ch0701-0853/hrs_0711?hrs_0711-1108.htm).

<sup>46</sup> ID Code § 18-7027 (2024).

<sup>47</sup> ID Code § 18-7028 (2024).

<sup>48</sup> <https://igla.gov/documents/legislation/ilcs/documents/07000050K12-20.6.htm>.

<sup>49</sup> IN Code § 35-45-11-2 (2024).

<sup>50</sup> <https://legis.iowa.gov/docs/code/2022/709.18.pdf>.

<sup>51</sup> KS Stat § 21-6205 (2024).

<sup>52</sup> <https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=48745>.

<sup>53</sup> <https://codes.findlaw.com/la/revised-statutes/la-rev-stat-tit-14-sect-101>.

Maine	Punishable under Class ‘D’ Felony as “Abuse of Corpse” <sup>54</sup>
Maryland	Punishable under Misdemeanour as “Unnatural or perverted sexual practice” <sup>55</sup>
Massachusetts	NA
Michigan	Punishable under Misdemeanour for sexual contact and Felony for sexual penetration, with dead human body <sup>56</sup>
Minnesota	Punishable under Misdemeanour as “Bestiality” <sup>57</sup>
Mississippi	Punishable under Felony as “Desecration of human corpse” <sup>58</sup>
Missouri	Punishable under Felony as “Abuse of a corpse” <sup>59</sup>
Montana	Punishable under Class ‘4’ Felony as “Human skeletal remains or burial goods” <sup>60</sup>
Nebraska	Punishable under Class ‘4’ Felony as “Human skeletal remains or burial goods” <sup>61</sup>

<sup>54</sup> § 17.508.

<sup>55</sup> MD Criminal Law Code § 3-322 (2023).

<sup>56</sup> <https://codes.findlaw.com/mi/chapter-750-michigan-penal-code/mi-comp-laws-750-160d/>.

<sup>57</sup> <https://revisor.mn.gov/statutes/cite/609.294>.

<sup>58</sup> <https://law.justia.com/codes/mississippi/title-97/chapter-29/in-general/section-97-29-25/>.

<sup>59</sup> <https://en.wikipedia.org/wiki/Necrophilia>.

<sup>60</sup> § 28-1301.

<sup>61</sup> § 23-1301.



Nevada	Punishable under Category ‘A’ Felony as “Unlawful Act” <sup>62</sup>
New Hampshire	Punishable under Misdemeanour as “Abuse of corpse” <sup>63</sup>
New Jersey	Punishable under Class ‘3’ Felony as “Disturbing, desecrating human remains” <sup>64</sup>
New Mexico	NA
New York	Punishable under Class ‘A’ Misdemeanour as “Sexual Misconduct” <sup>65</sup>
North California	Punishable under Class ‘1’ Felony as “Disturbing human remains” <sup>66</sup>
North Dakota	Punishable under Class ‘A’ Misdemeanour as “Deviate sexual act” <sup>67</sup>
Ohio	Punishable under Second Degree Misdemeanour as “Abuse of a corpse” <sup>68</sup>
Oklahoma	Punishable under Felony as “Desecration of a human corpse” <sup>69</sup>
Oregon	Punishable under Class ‘B’ Felony as “Abuse of corpse in the first degree” <sup>70</sup>

<sup>62</sup> <https://law.onecle.com/nevada/crimes/201.450.html>.

<sup>63</sup> § 644:7.

<sup>64</sup> NJ Rev Stat §2C:22-1 (2024).

<sup>65</sup> <https://nysenate.gov/legislation/laws/PEN/130.20>.

<sup>66</sup> <https://codes.findlaw.com/nc/chapter-14-criminal-law/nc-gen-st-sect-14-401-22.html>.

<sup>67</sup> <https://ndlegis.gov/cencode/t12-1c20.pdf?20150226073932>.

<sup>68</sup> [https://codelibrary.amlegal.com/codes/springdale/latest/spring\\_oh/0-0-0-7352](https://codelibrary.amlegal.com/codes/springdale/latest/spring_oh/0-0-0-7352).

<sup>69</sup> <https://law.justia.com/codes/oklahoma/2014/title-21/section-21-1161.1>.

<sup>70</sup> [https://oregon.public.law/statutes/ors\\_166.087](https://oregon.public.law/statutes/ors_166.087).

Pennsylvania	Punishable under Second Degree Misdemeanour as “Abuse of Corpse” <sup>71</sup>
Rhode Island	Punishable under First Degree Sexual Assault as “Necrophilia” <sup>72</sup>
South Carolina	Punishable under Felony as “Destruction or desecration of human remains or repositories” <sup>73</sup>
South Dakota	NA
Tennessee	Punishable under Class ‘E’ Felony as “Abuse of Corpse”
	“Abuse of Corpse” <sup>74</sup>
Texas	Punishable as Felony under “Abuse of Corpse” <sup>75</sup>
Utah	Punishable as Third Degree Felony under “Abuse or desecration of a dead human body” <sup>76</sup>
Vermont	NA
Virginia	NA
Washington	Punishable as Class ‘C’ Felony under “Sexually violating human remains” <sup>77</sup>
West Virginia	Punishable as Misdemeanour as “Indecent exposure” <sup>78</sup>

<sup>71</sup> <https://law.justia.com/codes/pennsylvania/title-18/chapter-55/section-5510/>.

<sup>72</sup> <https://law.justia.com/codes/rhode-island/2012/title-11/chapter-11-20/chapter-11-20-1.2>.

<sup>73</sup> <https://scstatehouse.gov/code/t16c017.php>.

<sup>74</sup> TN Code § 39-17-312 (2024).

<sup>75</sup> <https://statutes.capitol.texas.gov/Docs/PE/htm/PE.42.htm#42.08>.

<sup>76</sup> [https://law.justia.com/codes/utah/2006/title76/76\\_0bO41.html](https://law.justia.com/codes/utah/2006/title76/76_0bO41.html).

<sup>77</sup> <https://app/leg.wa.gov/RCW/default.aspx?cite=9A.44.105>.

<sup>78</sup> § 61-8-9.

Wisconsin	Punishable under Class ‘G’ Felony as § 940.225 (7) <sup>79</sup>
Wyoming	Punishable under Felony as “Mutilation of dead human bodies” <sup>80</sup>

**B. United Kingdom:-** The section 70 of the Sexual Offences Act, 2003 provides for the punishment for sexual penetration with corpse i.e. imprisonment for a term not exceeding six months (in case of summary conviction) or not exceeding two years (in case of conviction on indictment)<sup>81</sup>. So, there is well enacted law for this act.

**C. South Africa:-** The section 14 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act, 2007 penalises the commission of sexual act with the corpse. The sentence is to be determined by the Court, taking into account the severity and specific circumstances of the crime<sup>82</sup>.

**D. New Zealand:-** The section 150 of the Crimes Act, 1961 provides for the punishment for the offence against the dead bodies and penalises for a term not exceeding two years<sup>83</sup>. The existing law in New Zealand effectively criminalize such acts so as to protect the dignity of the deceased and their families.

<sup>79</sup> <https://codes.findlaw.com/wi/crimes-ch-938-to-951/wi-st--940-225/>.

<sup>80</sup> WY Stat §6-4-502 (2014).

<sup>81</sup> 70. Sexual penetration of a corpse:-

(1) A person commits an offence if-

(A) he intentionally performs an act of penetration with a part of his body or anything else,

(B) what is penetrated is a part of the body of a dead person,

(C) he knows that, or is reckless as to whether, that is what is penetrated, and

(D) the penetration is sexual.

(2) A person guilty of an offence under this section is liable-

(A) on summary conviction, to imprisonment for a term not exceeding 6 months or a fine not exceeding the statutory maximum or both;

(B) on conviction on indictment, to imprisonment for a term not exceeding 2 years.

<sup>82</sup> 14. Sexual act with corpse:- A person who unlawfully and intentionally commits a sexual act with a human corpse, is guilty of the offence of committing a sexual act with a corpse.

<sup>83</sup> 150. Misconduct in respect of human remains:- Everyone is liable to imprisonment for a term not exceeding 2 years who-

(A) neglects to perform any duty imposed on him or her by law or undertaken by him or her with reference to the burial or cremation of any dead human or human remains; or

(B) improperly or indecently interferes with or offers any indignity to any dead human body or human remains, whether buried or not.

## **SUGGESTION & CONCLUSION:-**

So, after understanding the current scenario, the author came to suggest that there must be an amendment in the following acts so as to include “Necrophilia” as a penal offence; the suggested provision might be, as follows:

### **(A) Bhartiya Nayay Sanhita, 2023:-**

#### Chapter VI A

#### Of offences against Dead Bodies

146A. Necrophilia:- Whoever have sexual intercourse with the dead body, or with sexual intent touches the vagina, penis, anus or breast of the dead body, or does any other act with sexual intent which involves physical contact without penetration is said to commit Necrophilia and shall be punished with imprisonment of either description for a term which may extend to five years, and shall also be liable to fine.

Provided that whoever, commit an offence mentioned above with the dead body of a woman shall be punished with rigorous imprisonment for a:

### **(B) The Protection of Children from Sexual Offences Act, 2012:-**

#### F.---Necrophilia and Punishment Therefor

12A. Necrophilia:- Whoever have sexual intercourse with the dead body of a child, or with sexual intent touches the vagina, penis, anus or breast of the dead body of child, or does any other act with sexual intent which involves physical contact without penetration is said to commit Necrophilia.

12B. Punishment for Necrophilia:- Whoever, commits Necrophilia shall be punished with rigorous imprisonment for a term, which shall not be less than seven years but which may extend to imprisonment for life, and with fine.

However, these are mere suggestive provisions, the legislature need to have an in-depth analysis of this Act and provide best outcome to citizens of the country and thereby strengthen the principle of

Article 21 of the Constitution which provides for the dignity of the deceased persons<sup>84</sup>. So, in the end coming to the conclusion, after analysing the above observations it is concluded that the policy makers should address the this issue urgently because otherwise these type of cases mentioned earlier would go unreported and the accused were always be acquitted. That situation would ultimately affect the reputation of the country as well.

---

<sup>84</sup> Ibid.

## **BIBLIOGRAPHY:-**

### **A. BARE ACTS REFERRED:-**

- i. Bhartiya Nayay Sanhita, 2023 (Act 45 of 2023);
- ii. Indian Penal Code, 1860 (Act 45 of 1860);
- iii. The Protection of Children from Sexual Offences Act, 2012 (Act 32 of 2012);
- iv. The US State Statutes i.e. Criminal Codes via websites mentioned in footnotes;
- v. Sexual Offences Act, 2003 (2003 c. 42) (United Kingdom);
- vi. Criminal Law (Sexual Offences and Related Matters) Amendment Act, 2007 (Act 32 of 2007) (South Africa);
- vii. Crimes Act, 1961 (Act No. 43 of 1961) (New Zealand).

### **B. CASE LAWS REFERRED:-**

- i. Rangaraju @Vajapeyi V. State of Karnataka 2023 SCC OnLine Kar 23;
- ii. Neelkanth Nagesh V. State of Chhattisgarh 2024 SCC OnLine Chh 13078;
- iii. Kedukhoyi V. State of Nagaland CRL.A(J)/10/2022;
- iv. Nayan Biswas V. State of Andhra Pradesh APHC010286002025 (2025).

### **C. BOOKS REFERRED:-**

- i. Constitutional Law of India written by Narender Kumar published by Allahabad Law Agency (10<sup>th</sup> Edition) (ISBN:81-89530-15-1);
- ii. Indian Penal Code written by Prof. S.N. Misra published by Central Law Publications (22<sup>nd</sup> Edition) (ISBN: 978-93-88267-67-0);
- iii. Women & Criminal Law written by Dr. S.R. Myneni published by New Era Law Publication (1<sup>st</sup> Edition) (ISBN: 978-93-92234-07-1);

iv. Offences against Child & Juvenile Offences written by Dr. S.R. Myneni published by New Era Law Publications (2<sup>nd</sup> Edition) (ISBN: 978-93-92234-77-4);

v. Criminology & Penology written by Prof. N.V. Paranjape published by Central Law Publications (19<sup>th</sup> Edition) (ISBN: 978-81-962777-2-7).

#### **D. RESEARCH PAPERS REFERRED:-**

i. Kumar. P., Rathee. S., & Gupta. R. (2019). Necrophilia: An understanding. *International Journal of Indian Psychology*, 7(2), 607-616. DIP: 18-01.073/20190702, DOI: 10.25215/0702.073;

ii. “Necrophilia: Loving the Dead written by Sharol Steven published in *International Journal of Engineering, Management and Humanities (IJEMH)* (Volume 4) (Issue 3) (May-June) at pp:88-96;

iii. Atulya S Menon, Nitin Nishad. Necrophilia: A Cruelty Towards Corpse Review Analysis. *Indian Journal of Forensic Medicine and Toxicology*/Volume 18 No. 3, July – September 2024;

iv. Huber Von H: Nekrophilie. *Kriminalistik* 16:564-8, 1962. Jones E: On the Nightmare. New York, Liveright, 1931, pp: 109-112;

v. From Silence to Sanction: Comparative Analysis of Necrophilia Laws in India and Other Countries by Hifajatali Sayyed & Jyotsana Singh published by Taylor & Francis (<https://doi.org/10.1080/23311886.2024.2437700>);

vi. Davidson, Nicholas; Dean, Trevor; Lowe, K. J. P. (1994). *Crime, Society and the Law in Renaissance Italy*. pp. 74-98. DOI: 10.1017/CBO9780511523410.006. ISBN 978-0-511-52341-0;

vii. Luan Pao-Chun (1994). “The Corpse-Raping Emperor”. *Tales about Chinese Emperors: Their Wild and Wise Ways*. Hai Feng Publishing Company. Pp: 148-?;

viii. “A New Classification of Necrophilia written by Anil Aggrawal published in *Journal of Forensic and Legal Medicine* (Aug-2009) 16(6):316-20;

ix. “Organ trade twist to Noida horror, body parts missing” published in *Sify*

News on 02-01-2007 (Wikipedia);

x. “Sexual Attraction to Corpses: A Psychiatric Review of Necrophilia written by Jonathan P. Rosman, MD; and Phillip J. Resnick, MD published in Bull Am Acad Psychiatry Law, Vol.17, No. 2, 1989.

#### **E. WEBSITES REFERRED:-**

“A Study on 2006 Noida Serial Murder: Nithari Hatyakand with Special Reference to the Psychology of the accused published in legalserviceindia.com (<https://www.legalserviceindia.com/legal/article11680-study-on-2006-noida-serial-murder0nithari-hatyakand-with-specialreference-to-the-psychology-of-the-accused.html>);

“Nithari serial killings case: Citing shoddy probe, Allahabad HC acquits Koli, Pandher” by Ishita Mishra published in The Hindu (Wikipedia); iii. “Life Term for Chembur Necrophiliac” written by Anand Holla published in Mumbai Mirror on 10-12-2010 (<https://mumbaimirror.indiatimes.com/mumbai/other/life-term-forchembur-----necrophiliac/articleshow/16081308.html>);

“Man charged of Necrophilia arrested” written by PTI published in Times of India on 16-01-2010 (<https://timesofindia.com/city/mumbai/mancharged-of-necrophilia-arrested/articleshow/543462.cms>);

“Thiruvananthapuram shaken over teenager who killed boy, then had sex with the dead body” written by TNM Staff published in The News Minute on 25-08-2015 (<https://www.thenewsminute.com/kerala/thiruvananthapuram-shaken-overteenager-who-killed-boy-then-had-sex-dead-body-33662>);

“Kerala” Teenager was aware he had sex with a dead body, say officials” written by Sandra Marina Fernandes published in Oneindia on 26-08-2015 (<https://www.oneindia.com/thiruvananthapuram/kerala/teenager-killsminor-dead-body-murder-crime-1849804.html>);

“Palghar stunned by Necrophilia, a man raped woman’s corpse” written by Tribune Web Desk in The Tribune on 04-07-2020



(<https://www.google.com/amp/s/www.tribuneindia.com/news/nation/palghar-stunned-by-necrophilia-a-man-raped-women-ans-corpse-108480/amp>);

“Man arrested on charges of Necrophilia in Burhanpur” written by TOI published in The Times of India on 09-10-2025 (<https://timesofindia.indiatimes.com/city/indore/man-arrested-on-charges-of-necrophilia-in-burhanpur/articleshow/124399100.cms>);

“Gujarat Girl Rape-Murder: ‘Serial Killer returned to murder scene to commit Necrophilia’” written by TNN published in The Times of India on 28-11-2024 ([https://www.google.com/amp/s/timesofindia.indiatimes.com/city/surat/all-eged-serial-killer-returns-to-crime-scene-for-necrophilia-shocking-details-merge/amp\\_articleshow/115741697.cms](https://www.google.com/amp/s/timesofindia.indiatimes.com/city/surat/all-eged-serial-killer-returns-to-crime-scene-for-necrophilia-shocking-details-merge/amp_articleshow/115741697.cms));

“Graves Desecrated in Madhya Pradesh’s Khandwa, Police Suspect Occult Link” written by Karishma Kotwal published in The Times of India on 25-05-2025([https://www.google.com/amp/s/timesofindia.indiatimes.com/city/indore/graves/desecrated-in-khandwa-police-suspect-occult-link/amp\\_articleshow/121385646.cms](https://www.google.com/amp/s/timesofindia.indiatimes.com/city/indore/graves/desecrated-in-khandwa-police-suspect-occult-link/amp_articleshow/121385646.cms));

<https://law.justia.com/codes/alabama/title-13a/chapter-11/article-1/section-13a-11-13/>;

<https://law.justia.com/codes/alaska/1993/title-11/chapter-11-61/section-11-61-130/>;

<https://www.azleg.gov/ars/32/01364.htm>;

<https://law.justia.com/codes/arkansas/title-5/subtitle-6/chapter-60/subchapter-1/section-5-60-101/>;

<https://law.justia.com/codes/colorado/title-18/article-13/section-18-13-101/>;

<https://law.justia.com/codes/connecticut/title-53a/chapter-952/section-53a-73a/>;

<https://delcode.delaware.gov/title11/c005/sc07/index.html>;

<https://codes.findlaw.com/fl/title-xlvi-crimes/fl-st-sect-872-06/>;

<https://law.justia.com/codes/georgia/title-16/chapter-6/section-16-6-7/>;

[https://capitol.hawaii.gov/hrscurrent/vol14\\_ch0701-0853/hrs\\_0711?hrs\\_0711-1108.htm](https://capitol.hawaii.gov/hrscurrent/vol14_ch0701-0853/hrs_0711?hrs_0711-1108.htm);

<https://igla.gov/documents/legislation/ilcs/documents/07000050K12-20.6.htm>;

<https://legis.iowa.gov/docs/code/2022/709.18.pdf>;

<https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=48745>;

<https://codes.findlaw.com/la/revised-statutes/la-rev-stat-tit-14-sect-101>;

<https://codes.findlaw.com/mi/chapter-750-michigan-penal-code/mi-complaws-750-160d/>;

<https://revisor.mn.gov/statutes/cite/609.294>;

<https://law.justia.com/codes/mississippi/title-97/chapter-29/ingeneral/section-97-29-25/>;

<https://en.wikipedia.org/wiki/Necrophilia>;

<https://law.onecle.com/nevada/crimes/201.450.html>;

<https://nysenate.gov/legislation/laws/PEN/130.20>;

<https://codes.findlaw.com/nc/chapter-14-criminal-law/nc-gen-st-sect-14-401-22.html>;

<https://ndlegis.gov/cencode/t12-1c20.pdf?20150226073932>;

[https://codelibrary.amlegal.com/codes/springdale/latest/spring\\_oh/0-0-0-7352](https://codelibrary.amlegal.com/codes/springdale/latest/spring_oh/0-0-0-7352);

<https://law.justia.com/codes/oklahoma/2014/title-21/section-21-1161.1>;

[https://oregon.public.law/statutes/ors\\_166.087](https://oregon.public.law/statutes/ors_166.087);

<https://law.justia.com/codes/pennsylvania/title-18/chapter-55/section-5510/>;

<https://law.justia.com/codes/rhode-island/2012/title-11/chapter-11-20/chapter-11-20-1.2>;

<https://scstatehouse.gov/code/t16c017.php>;

<https://statutes.capitol.texas.gov/Docs/PE/htm/PE.42.htm#42.08>;

[https://law.justia.com/codes/utah/2006/title76/76\\_0bO41.html](https://law.justia.com/codes/utah/2006/title76/76_0bO41.html);

<https://app/leg.wa.gov/RCW/default.aspx?cite=9A.44.105>;

<https://codes.findlaw.com/wi/crimes-ch-938-to-951/wi-st--940-225/>.