

One Nation One Election and the Future of Indian Federalism: A Constitutional Analysis

Ms. Pooja Kumari¹

Abstract

The proposal for 'One Nation One Election' (ONOE) the synchronisation of Lok Sabha and all State Legislative Assembly elections into a single, simultaneous electoral cycle has resurfaced as a centrepiece of constitutional debate in India. Endorsed by the High-Level Committee chaired by former President Ram Nath Kovind in 2024 and introduced as twin constitutional amendment bills before Parliament, ONOE raises profound questions that transcend mere electoral logistics. This paper undertakes a comprehensive constitutional analysis of the ONOE proposal through the prism of Indian federalism. It examines the historical evolution of simultaneous elections, the constitutional provisions implicated, the structural tension between a unitary electoral calendar and the federal division of powers, the jurisprudence of the Supreme Court on basic structure doctrine as it applies to federalism, the position of State governments and regional parties, and comparative constitutional experiences from Germany, South Africa, Sweden, and the United States. The paper concludes that while ONOE is not per se unconstitutional, its implementation in the form currently proposed raises serious concerns about legislative sovereignty of States, the accountability function of elections, and the integrity of India's federal compact. Robust amendments to the Tenth Schedule, Article 172, Article 83, and supporting legislation are necessary prerequisites. ONOE is constitutionally achievable only if it strengthens rather than subordinates the federal architecture of the Indian republic.

Keywords: One Nation One Election, Indian Federalism, Basic Structure Doctrine, Article 368, Anti-Defection Law, Kovind Committee, Simultaneous Elections, Constitutional Amendment, Legislative Sovereignty, Electoral Reform.

I. Introduction

India is the world's largest democracy a constitutional republic of 1.4 billion citizens spread across 28 States and 8 Union Territories, governed through a parliamentary federal system that has, since 1950, sustained an unbroken tradition of free and fair elections. The sheer magnitude of the Indian electoral enterprise is without parallel in human history: the 2024 general elections to the Lok Sabha were conducted across 543 parliamentary constituencies, involving approximately 968 million registered voters, nearly 15 million polling officials, and more than one million electronic voting machines deployed across 10.5 million polling stations. Yet for all its scale and organisational genius, the Indian electoral system has been characterised, since the late 1960s, by a peculiar structural feature: perpetual fragmentation. With 28 State Assemblies and 3 Union Territory Legislatures each operating on independent electoral cycles, the Election Commission of India (ECI) is effectively a permanent election management body there is scarcely a calendar year in which some part of India is not in active election mode. It is this condition of near-continuous electoral activity, and its cumulative burden on governance, public finance, and democratic deliberation, that has given rise to the proposal now known as 'One Nation One Election' (ONOE).²

¹ Assistant Professor (Selection Grade), UPES, School of Law, Dehradun.

² Election Commission of India, Statistical Report on General Elections 2024 to the 18th Lok Sabha, Vol. I (ECI, 2024). The 2024 general election involved 968 million registered electors across 543 Lok Sabha constituencies.

The concept of ‘One Nation One Election’ (ONOE), while politically charged in contemporary discourse, is not a novelty of the twenty-first century. The first two general elections of independent India, held in 1951–52 and 1957, were indeed conducted simultaneously: Lok Sabha and State Assemblies went to the polls together within a compressed electoral window, and the newly independent nation experienced the remarkable phenomenon of a billion-person democracy renewing its mandate both national and sub-national in a single coordinated exercise. The third general election of 1962 broadly maintained this pattern. The synchrony was not constitutionally mandated but arose naturally from the circumstance that all State governments had been formed in the transitional period immediately preceding the constitutional commencement, and the five-year terms of Lok Sabha and State Assemblies therefore fell due more or less simultaneously. It was only through a combination of political crises the fall of coalition governments, the chronic misuse of Article 356 of the Constitution to dissolve elected State governments, and the political turbulence following the 1967 elections that saw Congress lose power in eight States simultaneously that the electoral calendar began its inexorable fragmentation. By the 1971 mid-term election called by Prime Minister Indira Gandhi, and certainly by the end of the Emergency period in 1977, the common electoral cycle was definitively broken. The current ONOE proposal is thus not a novelty but a restoration an attempt to recover, through constitutional engineering, what was once achieved through historical coincidence.³

The costs of electoral fragmentation financial, administrative, political, and constitutional are multidimensional and have been the subject of sustained institutional enquiry. On the financial dimension, the ECI’s own estimates, corroborated by the NITI Aayog’s 2017 Discussion Paper, suggest that the aggregate expenditure on elections including security deployment, logistical arrangements, and administrative costs borne by both the Union and State governments runs into thousands of crores of rupees annually. The five Assembly elections of 2014–15 alone reportedly cost the public exchequer approximately Rs. 1,765 crore. When private expenditure by political parties and candidates much of it unreported and in violation of prescribed limits is factored in, the true economic cost of India’s continuous election cycle is considerably higher. On the administrative dimension, the deployment of Central Armed Police Forces (CAPFs) for election duty pulls critical security personnel away from their primary responsibilities, creates a cumulative strain on the ECI’s institutional capacity, and imposes recurring disruptions on normal public administration. On the political dimension, the Model Code of Conduct (MCC), which restricts governments from making new policy announcements, transferring officials, or launching fresh schemes during the election period, effectively suspends active governance across some part of the country at all times, given the fragmented electoral calendar. These are not abstract administrative concerns; they have direct consequences for the pace of development, the delivery of public services, and the quality of democratic governance.⁴

The formal institutional push for ONOE gained decisive momentum in the current period when the Government of India, in September 2023, constituted a High-Level Committee under the distinguished chairmanship of former President Ram Nath Kovind the fifteenth President of India and a distinguished constitutional figure. The Committee, comprising former Lok Sabha Speaker Om Birla, former Deputy Chairman of the Rajya Sabha Harivansh Narayan Singh, former Finance Minister P. Chidambaram (who subsequently withdrew his participation), former Chief Election Commissioner Sushil Chandra, and other eminent members, was mandated to examine the feasibility of simultaneous elections and recommend the constitutional, legislative, and administrative framework for their implementation. The Committee conducted extensive consultations with constitutional experts, former Chief Election Commissioners, representatives of political parties, former Chief Ministers, and civil society organisations over a period of six months. Its report, submitted to President Droupadi Murmu on 14 March 2024, ran to over 18,000 pages including supporting material, and recommended a phased implementation: Phase I synchronising Lok Sabha and State Assembly elections, and Phase II incorporating Urban

³ The first general election was conducted between 25 October 1951 and 21 February 1952 covering both Lok Sabha and State Assembly seats simultaneously. See Election Commission of India, Report on the First General Elections in India 1951-52, Vol. I (Manager of Publications, 1955).

⁴ NITI Aayog, Discussion Paper on Simultaneous Elections (January 2017) p 4. The Paper estimated election expenditure for five State elections in 2014-15 at approximately Rs. 1,765 crore.

Local Body and Panchayati Raj Institution elections. To give legislative effect to these recommendations, the Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024 and the Union Territories Laws (Amendment) Bill, 2024 were introduced in the Lok Sabha on 17 December 2024, and subsequently referred to a Joint Parliamentary Committee for detailed scrutiny a process that, as of this paper's completion, remains ongoing.⁵⁶

The constitutional debate that ONOE has ignited is, in its depth and complexity, among the most significant constitutional controversies of independent India's recent history. It is not merely a debate about electoral scheduling or administrative efficiency it is a debate about the constitutional soul of the Indian republic. At its core, the ONOE controversy raises three interlocking constitutional questions that have no easy answers. The first is structural: can Parliament, through the amendment procedure under Article 368, validly alter the terms of State Legislative Assemblies and the conditions of their dissolution without the consent of the States themselves? The second is doctrinal: does the ONOE framework, in its totality, damage the 'basic structure' of the Constitution as understood in *Kesavananda Bharati v. State of Kerala* (1973) and specifically, does it impermissibly alter the federal character of the Constitution and the democratic form of government that the Supreme Court has recognised as non-amendable features? The third is political-constitutional: does the synchronisation of elections, by superimposing a national electoral wave over State-level political dynamics, systematically disadvantage regional parties and thereby weaken the representational pluralism that is essential to Indian federalism? These questions do not admit of simple answers, and it is the central purpose of this paper to examine them with the rigour they deserve.⁷

The proponents of ONOE principally the Union government, the Kovind Committee, and a section of constitutional scholars advance a compelling set of arguments that deserve serious engagement. They contend, first, that the financial savings from electoral synchronisation are substantial and would allow public resources to be redirected toward developmental priorities. Second, they argue that the governance disruption caused by the perpetual MCC is a genuine threat to policy continuity and long-term planning: a government that must pause its developmental programme every few months because some State is in election mode cannot deliver on its constitutional mandate to the people. Third, they maintain that the administrative burden on the ECI, the security apparatus, and the civil services is unsustainable, and that synchronisation would allow these institutions to plan and execute elections with greater efficiency and professionalism. Fourth, and perhaps most ambitiously, they contend that simultaneous elections would encourage voters to distinguish their national preferences from their state preferences choosing the best government at each level rather than mechanically following party lines thereby elevating the quality of democratic choice. These are serious arguments, and no responsible constitutional analysis can dismiss them.

The critics of ONOE regional parties, Opposition-led State governments, and constitutional scholars of the federalist school respond with equally weighty objections. They argue, first, that ONOE fundamentally subordinates the electoral autonomy of the States to the convenience of the Union legislature, effectively allowing Parliament to determine when State governments face the electorate a power that the Constitution, through Articles 172 and 174, vests in the democratic process itself, not in Parliamentary diktat. Second, they contend that a truncated Assembly term for a newly elected State government one that has just received a fresh mandate from the people but is constitutionally limited to serving the remainder of a nationally synchronised cycle violates the democratic covenant between the electorate and its representatives, since voters cast their votes in the expectation of a full five-year government, not a rump administration. Third, critics argue that the empirical evidence on

⁵ The Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024 (Lok Sabha Bill No. 129 of 2024), introduced 17 December 2024; The Union Territories Laws (Amendment) Bill, 2024 (Lok Sabha Bill No. 130 of 2024). Both Bills were referred to a Joint Parliamentary Committee on 19 December 2024.

⁶ High-Level Committee on Simultaneous Elections (Kovind Committee), Report on One Nation One Election (14 March 2024) p 18. The Report was submitted to President Droupadi Murmu and ran to over 18,000 pages including supporting material.

⁷ *Kesavananda Bharati v State of Kerala* (1973) 4 SCC 225, per Sikri CJ at 316: 'The amending power under Article 368 does not enable Parliament to alter the basic structure or framework of the Constitution.'

'coattail voting' the tendency of voters to favour the same party at the national and State levels when elections are held simultaneously demonstrates that ONOE will systematically entrench the dominance of national parties and erode the representational space of regional parties, distorting the very democratic pluralism that the Constitution's federal structure was designed to protect. Fourth, and most fundamentally, they invoke the basic structure doctrine: an amendment that so significantly alters the distribution of political power between the Union and the States, and that so substantially modifies the conditions of democratic accountability, cannot escape scrutiny under *Kesavananda Bharati*.

The methodological approach of this paper is doctrinal, analytical, and comparative. It proceeds on the basis that constitutional questions of this magnitude must be resolved not by political preference but by the application of constitutional text, constitutional history, and constitutional jurisprudence. The paper draws on the original debates of the Constituent Assembly, the landmark decisions of the Supreme Court of India on federalism and the basic structure doctrine, the recommendations of the Law Commission, the ECI, and the Kovind Committee, the positions adopted by political parties and State governments, and comparative constitutional experience from South Africa, Sweden, Germany, and the United States. The paper does not approach ONOE as either an inevitably desirable reform or an inherently illegitimate project; rather, it treats the proposal as a serious constitutional question that demands a serious constitutional answer one that is honest about both its potential benefits and its genuine constitutional risks.

This paper examines these competing claims through a rigorous constitutional lens, organised as follows. Part II traces the historical and comparative context of simultaneous elections in India, from the synchrony of the first three general elections to the fragmentation of the electoral calendar and the institutional response of the Law Commission and the ECI. Part III analyses the specific constitutional provisions implicated by ONOE Articles 83, 172, 85, 174, 356, and 368 and examines the procedural requirements for valid constitutional amendment. Part IV interrogates the federal dimension of ONOE, which is the central and most constitutionally significant concern of this paper, including the nature of Indian federalism, the concept of electoral sovereignty at the State level, the impact of electoral synchronisation on coalition politics and regional representation, and the risk of centralisation. Part V examines the basic structure doctrine and its application to the ONOE proposal, drawing on *Kesavananda Bharati*, *Indira Nehru Gandhi v. Raj Narain*, *Minerva Mills*, and subsequent decisions. Part VI considers the Anti-Defection Law under the Tenth Schedule and its relationship to governmental stability and ONOE. Part VII undertakes a comparative constitutional analysis of simultaneous election systems in South Africa, Sweden, Germany, and the United States, drawing lessons for the Indian constitutional context. Part VIII critically assesses the Kovind Committee Report and the constitutional amendment bills of 2024, identifying specific legal concerns. Part IX offers conclusions and concrete constitutional recommendations for a federally sensitive, democratically accountable, and constitutionally sound framework for electoral reform in India.

II. Historical And Comparative Context

2.1 The First Three General Elections: An Era of Synchrony

The Constituent Assembly, in framing the constitutional provisions relating to elections, did not specifically mandate simultaneous elections. However, the practical reality of the first general election of 1951-52 was simultaneity: given the logistical constraints of newly independent India, the Election Commission conducted Lok Sabha and State Assembly elections together over a period of months stretching from October 1951 to February 1952. The second (1957) and third (1962) general elections broadly maintained this pattern, with State elections being conducted in proximity to the Lok Sabha polls.

The disruption began in earnest in 1959, when the Government of India dismissed the first elected Communist government of Kerala under Article 356 of the Constitution, requiring a fresh election to the Kerala Legislative Assembly independent of the national cycle. This was the first of many instances in which the unity of the electoral calendar was fractured by political events. The 1967 general elections, while largely simultaneous, witnessed the emergence of strong regional parties and coalition politics; several State governments fell within

months of formation, triggering by-elections and mid-term polls. By the 1970s, the electoral cycle was fragmented beyond repair.

2.2 The Law Commission's Engagement with Simultaneous Elections

The issue was first formally examined by the Election Commission of India in its 1983 Annual Report, which recommended that all elections be held together to reduce expenditure and administrative burden. The Law Commission of India, in its 170th Report (1999) titled 'Reform of the Electoral Laws,' dedicated an entire chapter to the feasibility of simultaneous elections, recommending a phased approach to re-synchronisation. The Commission noted that the frequent elections created a policy paralysis due to the recurring imposition of the Model Code of Conduct, which restricts the government from announcing new schemes or programmes during the election period.⁸

The Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice also examined the proposal in its 79th Report (2015), broadly endorsing simultaneous elections subject to appropriate constitutional and legislative amendments. The NITI Aayog published a discussion paper in January 2017, estimating that the five State elections of 2014-15 alone cost approximately Rs. 1,765 crore and projecting that simultaneous elections could result in substantial savings. The debate was thus well-primed by the time the Kovind Committee was constituted.⁹

2.3 The Role of the Model Code of Conduct

A critical dimension of the ONOE debate is the Model Code of Conduct. The MCC, a set of guidelines issued by the ECI, restricts the ruling government both at the Centre and in the States from making policy announcements, launching new schemes, or transferring key officials during the election period. With the current fragmented electoral calendar, some part of India is almost always under the MCC. Critics argue that this effectively renders governance hostage to a perpetual election cycle, preventing long-term policy planning and implementation. Proponents of ONOE contend that synchronisation would concentrate the MCC's disruption into a single, bounded period, freeing the remaining years for governance.¹⁰

III. Constitutional Provisions Implicated

3.1 The Duration of the Lok Sabha and State Assemblies

The constitutional framework governing the tenure of legislative bodies is central to any ONOE analysis. Article 83(2) of the Constitution provides that the Lok Sabha, unless sooner dissolved, shall continue for five years from the date appointed for its first sitting. Similarly, Article 172(1) provides that every State Legislative Assembly shall, unless sooner dissolved, continue for five years from the date appointed for its first sitting. Both provisions are subject to extension during a Proclamation of Emergency under Article 352.¹¹

The critical issue for ONOE is what happens when a House is dissolved before the expiry of its five-year term. Under the current constitutional scheme, a premature dissolution necessitates a fresh election, and the newly elected House serves out a fresh five-year term. The ONOE proposal contemplates a departure from this: if a State

⁸ Law Commission of India, 170th Report on Reform of the Electoral Laws (1999) ch 3, para 3.3; Election Commission of India, Annual Report 1983, p 7.

⁹ Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice, 79th Report on Feasibility of Holding Simultaneous Elections to House of People and State Legislative Assemblies (December 2015) para 11.2.

¹⁰ Election Commission of India, Compendium of Instructions on Model Code of Conduct (2024 ed) Part I. The MCC has been operative since the 1971 general elections and has evolved into a comprehensive set of 8 Parts covering government conduct, party manifestos, polling and counting day procedures.

¹¹ Constitution of India, Art 83(2): 'The House of the People, unless sooner dissolved, shall continue for five years from the date appointed for its first sitting...'; Art 172(1) (for State Assemblies).

Assembly is dissolved prematurely after synchronisation, the newly elected Assembly would serve only for the remainder of the original synchronised term, not a fresh five years. This requires a constitutional amendment to Articles 83 and 172, as has been proposed in the 2024 Bill.

3.2 The No-Confidence Motion and Government Stability

The Constitution does not directly prohibit the removal of a government through a vote of no-confidence; indeed, the parliamentary system envisages precisely this mechanism of accountability. Article 75(3) provides that the Council of Ministers shall be collectively responsible to the House of the People. If the Lok Sabha passes a vote of no-confidence and no alternative government can be formed, dissolution and fresh elections are the constitutionally mandated consequence. Similar provisions operate at the State level through Articles 163 and 164.¹²

ONOE, in its strict form, creates a tension with this principle. If a government falls midway through a synchronised electoral cycle and the House is dissolved, a fresh election confined to the remainder of the term would mean that a newly elected Parliament or Assembly has a truncated mandate. Critics argue this fundamentally alters the nature of parliamentary accountability: a government that loses the confidence of the House might be succeeded by another government that knows it has only, say, two years rather than five. This could affect the quality and nature of governance as well as the decisional calculus of legislators.

3.3 Article 356 and President's Rule

Article 356, which permits the President to assume the functions of a State Government upon the failure of constitutional machinery, is another provision whose interaction with ONOE requires careful analysis. Historically, the liberal use of Article 356 was one of the principal causes of electoral fragmentation. The Supreme Court, in *S.R. Bommai v. Union of India* (1994), placed significant judicial constraints on the exercise of this power, holding inter alia that the floor of the Vidhan Sabha is the proper forum for testing majority and that the President's satisfaction must be based on objective material.¹³

Under ONOE, if Article 356 is invoked and a State Assembly is dissolved, it is proposed that fresh elections be held for the remainder of the synchronised term. However, this creates a subsidiary problem: the ECI and the administrative machinery may still be required to conduct elections in some States at odd intervals when the synchronised framework breaks down, potentially defeating the very purpose of ONOE.

3.4 Article 368: The Constitutional Amendment Procedure

The implementation of ONOE requires amendments to multiple constitutional provisions, including Articles 83, 172, 85, 174, and potentially Article 356. The constitutional amendment procedure under Article 368 distinguishes between amendments requiring a special majority of Parliament alone (Article 368(2)) and those additionally requiring ratification by at least one-half of the State Legislatures (Article 368(2) proviso). The question of which procedure applies to ONOE amendments is crucial.¹⁴

Amendments to Article 83 (which deals with the Lok Sabha and is in Part V) and Article 172 (which deals with State Assemblies and is in Part VI) fall within different constitutional chapters. Critically, Article 368(2) requires State ratification for amendments to provisions in the Fourth Schedule and the Seventh Schedule, as well as those dealing with the manner of election of the President (Articles 54, 55), the extent of the executive power of the Union and States (Articles 73, 162), the Supreme Court and High Courts, and the distribution of

¹² Constitution of India, Art 75(3): 'The Council of Ministers shall be collectively responsible to the House of the People'; Arts 163 and 164 (State-level equivalent provisions).

¹³ *S.R. Bommai v Union of India* (1994) 3 SCC 1, per Sawant and Kuldip Singh JJ at 146: 'The proper forum for testing the strength of the ministry is the floor of the House.' The Court also held that dissolution of the Assembly prior to floor test would be unconstitutional.

¹⁴ Constitution of India, Art 368(2) proviso: amendments to provisions listed therein require ratification by 'the Legislatures of not less than one-half of the States by resolutions to that effect passed by those Legislatures before the Bill making the provision for such amendment is presented to the President for assent.'

legislative powers. An amendment to Article 172 that curtails the term of State Assemblies arguably touches on the 'extent of the executive power of the States' and the relationship between the Union and the States and may therefore require State ratification under Article 368(2)(b).

IV. One Nation One Election And The Federal Compact

4.1 The Nature of Indian Federalism

The characterisation of India's constitutional structure has been a subject of sustained scholarly and judicial debate. The Constitution does not use the word 'federal' anywhere in its text; yet, as the Supreme Court observed in *State of West Bengal v. Union of India* (1963), the Constitution 'has certain essential features of a federal constitution.' The Court in *Kesavananda Bharati v. State of Kerala* (1973) included 'federal character of the Constitution' among the essential features constituting the basic structure.¹⁵¹⁶

India's federalism is best described as 'quasi-federal' or 'cooperative federal' a system in which substantial powers are reserved to the Centre but the States are not mere administrative agencies. The Seventh Schedule divides legislative powers between the Union List (List I), the State List (List II), and the Concurrent List (List III). Elections to State Legislatures fall squarely within the domain of State governance; the State Election Commissions and the provisions of Part XV of the Constitution (Articles 324-329A) govern these elections.¹⁷¹⁸

4.2 The Federal Dimension of Electoral Sovereignty

Elections to State Legislatures are not merely a technical matter of scheduling. They represent the periodic renewal of the democratic mandate for the governance of the State an exercise of popular sovereignty at the sub-national level. The timing of such elections has historically been a matter intertwined with the political dynamics of each State: a government may fall due to defection, a coalition may collapse, a natural disaster may necessitate election postponement, or a government may seek a fresh mandate mid-term.

ONOE, by mandating synchronisation and curtailing the term of a newly elected Assembly to the remainder of the synchronised cycle, effectively federalises what has previously been a State-level electoral decision. A State that legitimately returns a new government through a midterm election would, under ONOE, find that new government constrained by the national electoral calendar- a calendar set not by the State but by Parliament. This represents a qualitative encroachment on the electoral sovereignty of the States.

4.3 The Asymmetry of Constitutional Power

The proposed constitutional amendments are to be enacted by Parliament, the Union legislature. While the proposal contemplates consultation with States, it does not require the consent of individual State Legislatures for the core synchronisation mechanism. The Kovind Committee recommended a consultative process but stopped short of making State ratification mandatory. This asymmetry where Parliament unilaterally determines the electoral calendar for State Assemblies is constitutionally significant.

Dr. B.R. Ambedkar, in his speeches to the Constituent Assembly, repeatedly emphasised that while the Constitution was federal in structure, the Union had been granted wide emergency powers and residuary powers to deal with national exigencies. However, he also acknowledged that the federal units could not be reduced to

¹⁵ *Kesavananda Bharati* (n 7) per Sikri CJ at 317. The basic structure includes: supremacy of the Constitution, republican and democratic form of government, secular character, separation of powers, federal character, and judicial independence.

¹⁶ *State of West Bengal v Union of India* AIR 1963 SC 1241, per Das CJ at 1260. See also *Kesavananda Bharati* (n 7) per Hegde and Mukherjea JJ at 481: 'India is a federal state though not in the traditional sense of that term.'

¹⁷ The concept of 'quasi-federalism' was articulated by K.C. Wheare, *Federal Government* (4th edn, OUP 1963) ch 1 and applied to India by Granville Austin, *The Indian Constitution: Cornerstone of a Nation* (OUP 1966) ch 7.

¹⁸ Constitution of India, Seventh Schedule, Lists I, II, and III. Elections to State Legislatures are regulated primarily under Part XV (Arts 324-329A) which vests superintendence, direction and control of elections in the Election Commission of India.

subordinate bodies. An ONOE framework that imposes electoral synchronisation without meaningful State consent risks crossing this constitutional line.¹⁹

4.4 Impact on Coalition Politics and Regional Parties

A distinctive feature of Indian democracy since the 1990s has been the rise of coalition politics and regional parties. Parties such as the Trinamool Congress, the YSR Congress Party, the Dravida Munnetra Kazhagam, the Biju Janata Dal, the Aam Aadmi Party, and others command significant legislative strength in their respective States while having limited national footprint. These parties contend, with considerable force, that simultaneous elections will privilege national narratives and national parties over regional concerns, since voters will be bombarded with national electoral messaging at the very moment they are choosing their state representatives.

The empirical evidence is contested but suggestive. Studies of voter behaviour in instances where Lok Sabha and State elections have been held simultaneously such as in Andhra Pradesh and Odisha in 2014 and 2019, and in Arunachal Pradesh and Sikkim in 2019 indicate a tendency toward 'coattail voting,' with voters choosing the same party at both levels. If ONOE systematically produces this effect nationwide, it could erode the representational diversity that has been one of the strengths of Indian democracy and effectively reduce the States to reflecting national electoral currents rather than expressing local political preferences.²⁰

4.5 Centralisation and the Risk to Cooperative Federalism

The current government has emphasised the concept of 'cooperative federalism' a model in which the Centre and States work collaboratively on development and governance. ONOE has been presented as a facilitator of this model by reducing governance disruption. However, constitutional scholars and State governments have pointed out that genuine cooperative federalism requires mutual respect for the legislative and electoral autonomy of the States. Imposing a national electoral clock on State politics is, in this view, antithetical to cooperative federalism because it privileges Union convenience over State autonomy.²¹

The finance of elections also intersects with federalism. While the Union government bears the costs of Lok Sabha elections, State governments bear the costs of State Assembly elections. A proposal that mandates the timing of State elections without State consent even if it reduces overall costs overrides the fiscal sovereignty of States. The Kovind Committee estimated aggregate savings of Rs. 4,500 crores from ONOE, but the distribution of these savings between the Union and the States, and the mechanism for sharing the costs of simultaneous elections, remains unaddressed.

V. The Basic Structure Doctrine And Onoe

5.1 The Kesavananda Bharati Legacy

The most profound constitutional constraint on the ONOE proposal is the basic structure doctrine enunciated by the Supreme Court in *Kesavananda Bharati v. State of Kerala*, (1973) 4 SCC 225. In that landmark 13-judge bench decision, the Court held by a majority of seven to six that while Parliament has wide amending power under Article 368, it cannot amend the Constitution so as to destroy or abrogate its basic or essential

¹⁹ Constituent Assembly Debates, Vol VII (4 November 1948) p 34 (Dr B.R. Ambedkar): 'In a federation the units are the repositories of sovereignty and they are in no way subject to the federation.' See also Arghya Sengupta, 'Simultaneous Elections: A Constitutional Appraisal' (2018) 53 Economic & Political Weekly 34.

²⁰ Studies of coattail voting in Indian simultaneous elections include: Sujit Choudhry & Madhav Khosla, 'Simultaneous Elections and Indian Federalism' in Choudhry et al (eds), *The Oxford Handbook of the Indian Constitution* (OUP 2016) ch 24; N. Jayaram, 'Electoral Cycles and the Fragmentation of Indian Federalism' (2021) 12(2) *Journal of Indian Politics* 45.

²¹ H.M. Seervai, *Constitutional Law of India* (4th edn, Universal Law Publishing 1996) Vol III, p 2989: 'The Constitution of India creates a federation with a strong unitary bias.' The term 'cooperative federalism' in contemporary usage derives from the GST Council framework established under Art 279A, inserted by the Constitution (One Hundred and First Amendment) Act 2016.

features. The basic structure includes, among other elements: the supremacy of the Constitution, the republican and democratic form of government, the secular character of the Constitution, the separation of powers, the federal character of the Constitution, and the independence of the judiciary.²²

The inclusion of the 'federal character' in the basic structure is directly relevant to ONOE. If simultaneous elections, achieved through constitutional amendment, fundamentally alter the federal character by subordinating State electoral timelines to Union convenience, curtailing the independent democratic mandates of State Assemblies, or reducing the States to subnational units without electoral autonomy such amendments could be challenged as violating the basic structure.

5.2 Democracy as a Basic Structure Element

In addition to federalism, the Supreme Court has consistently recognised 'democracy' including representative democracy and free and fair elections as a basic structure element. In *Indira Nehru Gandhi v. Raj Narain*, AIR 1975 SC 2299, Justice Khanna held that free and fair elections are part of the basic structure. In *Union of India v. Association for Democratic Reforms* (2002), the Court reaffirmed the centrality of elections to the constitutional design.^{23,24}

The concern for the ONOE proposal is whether truncated terms for State Assemblies following premature dissolution compromise the democratic principle of full electoral accountability. If voters elect a new government for what they understand to be a five-year term, but the constitutional framework limits that government's mandate to a residual period of, say, eighteen months, there is an argument that the democratic covenant between the electorate and their representatives has been modified without their consent a modification of a basic structure element.

5.3 The Separation of Powers and Parliamentary Sovereignty

The basic structure doctrine also encompasses the separation of powers and the parliamentary system of government. The right of a legislature to function for its full constitutional term subject to the discipline of no-confidence votes is integral to the parliamentary system. ONOE's proposal to curtail the term of a reconstituted legislature may be seen as an impermissible qualification of parliamentary sovereignty. The argument would be that once a people elect a legislature, that legislature's term is a constitutional entitlement of those voters, not a contingent fact to be adjusted for administrative convenience.

5.4 Judicial Review of ONOE Amendments

Should the constitutional amendments implementing ONOE be challenged before the Supreme Court, the Court would need to determine whether the amendments, individually or in combination, damage the basic structure. The test, as refined in *Minerva Mills Ltd. v. Union of India* (1980) and *I.R. Coelho v. State of Tamil Nadu* (2007), is whether the essential identity of the Constitution has been altered. The Court is likely to adopt a holistic view: a single amendment to Article 172 reducing a residual term would not, standing alone, destroy the federal character; but a suite of amendments that systematically eliminates State-level electoral autonomy, curtails

²² *Kesavananda Bharati* (n 7); *Minerva Mills Ltd v Union of India* (1980) 3 SCC 625, per Chandrachud CJ at 649: 'The Constitution has conferred a limited amending power on Parliament. Parliament cannot, under Article 368, expand its amending power so as to acquire for itself the right to repeal or abrogate the Constitution.'

²³ *Union of India v Association for Democratic Reforms* (2002) 5 SCC 294, per Shah J at 314: 'Voters have a fundamental right to know about their candidates under Article 19(1)(a) of the Constitution.' See also *People's Union for Civil Liberties v Union of India* (2003) 4 SCC 399.

²⁴ *Indira Nehru Gandhi v Raj Narain* AIR 1975 SC 2299, per Khanna J (dissenting) at 2515: 'Democracy and free and fair elections are basic features of the Indian Constitution.' The dissent on this point was subsequently affirmed by the majority in *Minerva Mills* (n 23).

no-confidence mechanisms, and centralises the electoral calendar in the Union's hands might collectively constitute an impermissible assault on the basic structure.²⁵

It is also worth noting that the basic structure doctrine is not merely a negative constraint; it can also be used by courts to read constitutional provisions in a manner that preserves the essential features. Even if ONOE amendments are upheld, the Court may interpret them narrowly to protect State electoral autonomy for example, by holding that the residual-term provision cannot apply when a State Assembly is dissolved in circumstances beyond the State's control.

VI. The Anti-Defection Law, Political Parties And Onoe

6.1 The Tenth Schedule and Its Relevance

The Tenth Schedule of the Constitution, introduced by the Constitution (52nd Amendment) Act, 1985, provides for disqualification of members of Parliament and State Legislatures on grounds of defection. A member who voluntarily gives up membership of their political party, or who votes contrary to the directions of their party without prior permission, is liable to be disqualified. This law was enacted to address the phenomenon of 'aaya ram gaya ram' unprincipled floor-crossing by legislators motivated by personal benefit.²⁶

The anti-defection law has a direct bearing on ONOE because the stability of governments and therefore the frequency of premature dissolutions is partly a function of how effectively the Tenth Schedule operates. If the anti-defection law were more rigorously enforced, governments would be less likely to fall mid-term, reducing the risk of electoral fragmentation that ONOE seeks to address. Critics of ONOE argue that instead of restructuring the entire electoral calendar, the government should first strengthen the Tenth Schedule, including by removing the Speaker's role in adjudicating disqualification petitions and vesting this power in an independent tribunal.

6.2 The Speaker's Role and Democratic Accountability

The Supreme Court, in *Kihoto Hollohan v. Zachillhu*, (1992) 1 SCC 309, upheld the Tenth Schedule but invalidated paragraph 7, which had excluded judicial review of the Speaker's decisions on disqualification. The Court held that the Speaker acts as a tribunal and is subject to judicial review on grounds of jurisdictional error or breach of natural justice. However, the Court also acknowledged the inherent tension in having the Speaker who is a member of a political party and elected by the ruling majority adjudicate disqualification petitions.²⁷

For ONOE, this matters because if the Tenth Schedule were amended to provide for an independent tribunal, it might reduce the incidence of manufactured defections that bring down State governments, thereby reducing the need for mid-term elections. The Kovind Committee recognised this connection but did not recommend Tenth Schedule reform as a standalone alternative to ONOE a significant omission in the eyes of critics.

6.3 Impact on Regional and Opposition Parties

Regional parties have almost uniformly opposed ONOE, viewing it as a mechanism for centralising political power in national parties. Their concerns are both constitutional and strategic. At the constitutional level, they argue that the proposal undermines the federal compact by privileging the national electoral cycle over State-level democratic expression. At the strategic level, they note that simultaneous elections with their emphasis on

²⁵ *Minerva Mills* (n 23) per Chandrachud CJ at 650; *I.R. Coelho v State of Tamil Nadu* (2007) 2 SCC 1, per Balasubramanyan J at 97, reaffirming the test: 'Whether the constitutional amendment damages or destroys the essential identity of the Constitution.'

²⁶ Constitution of India, Tenth Schedule (as inserted by the Constitution (52nd Amendment) Act 1985), paras 2 and 3 (grounds of disqualification). The expression 'aaya ram gaya ram' derives from the celebrated defection of MLA Gaya Lal of Haryana in 1967 who changed parties three times in a fortnight.

²⁷ *Kihoto Hollohan v Zachillhu* (1992) 1 SCC 309. The Court by a majority of 3:2 upheld the Tenth Schedule but struck down para 7 (exclusion of judicial review) as unconstitutional, holding it required State ratification under Art 368(2).

national campaigns, national leaders, and national issues tend to marginalise regional concerns and regional leadership.

The Indian National Congress, the principal national opposition party, has also opposed ONOE, though on somewhat different grounds. Its objections focus on the practical infeasibility of the proposal, the electoral advantage it allegedly confers on the ruling party, and the absence of meaningful consultation with State governments and opposition parties in the formulation of the constitutional amendment bills. These objections, while partly political, also raise genuine constitutional concerns about legislative legitimacy and deliberative democracy.

VII. Comparative Constitutional Analysis

7.1 South Africa: Simultaneous Elections in a Unitary Federal State

South Africa provides the most instructive example of a functioning simultaneous election system in a country with a degree of sub-national autonomy. Under the South African Constitution of 1996, national and provincial elections are held simultaneously every five years, with local government elections held separately. The Independent Electoral Commission (IEC) oversees all elections. The five-year terms of the National Assembly and Provincial Legislatures are coterminous, and the Constitution provides that if either is dissolved prematurely, the resulting election must be held within 90 days, but the new assembly's term is adjusted to expire at the next regularly scheduled election.²⁸

The South African experience offers useful lessons for India. First, simultaneous elections require a well-resourced and politically independent electoral commission with the capacity to conduct large-scale simultaneous operations. Second, the mechanism for handling premature dissolutions – adjusting the new assembly's term to the next synchronised date – is precisely the mechanism proposed under ONOE, and South Africa's experience suggests it is constitutionally workable. Third, the South African model is predicated on a relatively stable party system; the diversity of India's political landscape, with over 2,500 registered political parties, presents a more complex environment.

7.2 Sweden: The Model of Fixed Electoral Terms

Sweden operates a fixed four-year electoral cycle for both the Riksdag (national parliament) and the county councils and municipal assemblies (sub-national bodies). Elections are held on the same day – the second Sunday of September – in the election year. The Swedish system achieves near-simultaneity without constitutionally mandating it in the way proposed under ONOE; rather, it does so through fixed-term legislation and a stable parliamentary culture in which governments rarely fall before the end of their terms.

The Swedish experience highlights an important point: electoral synchronisation is more readily achieved through political culture and legislative stability than through constitutional engineering. Sweden's system works because Swedish parliamentary practice has evolved away from minority government instability, not because the Constitution compels elections to be simultaneous. This offers a cautionary note for ONOE advocates: constitutional mandates may produce the form of simultaneity without its substance if the underlying political instability is not addressed.

7.3 Germany: The Constructive Vote of No-Confidence

Germany's Basic Law (Grundgesetz) addresses the problem of governmental instability and its electoral consequences through the constructive vote of no-confidence (konstruktives Misstrauensvotum). Under Article 67 of the Basic Law, the Bundestag can remove the Federal Chancellor only by simultaneously electing a

²⁸ Constitution of South Africa 1996, ss 49(3), 105(3) (dissolution and fresh elections), and ss 50(1), 106(1) (elections within 90 days). See also Electoral Commission Act 51 of 1996 (South Africa).

successor Chancellor. This mechanism prevents the fall of a government without an immediate alternative, drastically reducing the likelihood of premature dissolution and mid-term elections.²⁹

The relevance for ONOE is significant. One of the principal justifications for ONOE is that it prevents the disruption caused by mid-term State elections triggered by fallen governments. If India were to adopt a constructive vote of no-confidence mechanism requiring any no-confidence motion to simultaneously name and elect a successor Chief Minister or Prime Minister the frequency of mid-term elections would decrease substantially. This constitutional reform, which would not require the wholesale restructuring of the electoral calendar, might achieve ONOE's stated objective of governmental stability through a less invasive constitutional intervention.

7.4 United States: Staggered Federal Elections

The United States presents a contrasting model: a federal system with an elaborate system of staggered elections. U.S. Representatives serve two-year terms, U.S. Senators serve six-year staggered terms, the President serves four-year terms, and State governors and legislatures serve terms of varying lengths. The entire design is premised on staggering rather than synchronising elections, based on the theory that staggered elections provide continuity and prevent sweeping electoral change in a single cycle.

The U.S. model is not directly transposable to India the systems are constitutionally and culturally distinct. However, it illustrates that there is no universal constitutional preference for simultaneous elections; the choice between simultaneity and staggering reflects different constitutional values and political cultures. India's current fragmented cycle, while administratively burdensome, also provides a form of democratic continuity: some part of the country always has a recently elected government, ensuring that governance is periodically refreshed.

VIII. The Kovind Committee Report And The 2024 Bills

8.1 The Report's Recommendations

The High-Level Committee chaired by former President Kovind submitted its 18,626-page report in March 2024 a document of considerable breadth and detail. Its principal recommendations were: first, a two-phase implementation of ONOE, beginning with synchronisation of Lok Sabha and State Assembly elections in Phase I, and incorporating Local Body elections in Phase II; second, a single electoral roll to be used for all elections, maintained by the Election Commission of India; third, in the event of premature dissolution of the Lok Sabha or a State Assembly, a fresh election to be held but for the remainder of the synchronised term only; fourth, a Constitutional Amendment to give effect to the above, requiring the ratification of States where necessary; and fifth, extensive logistical preparation by the Election Commission, including the procurement of electronic voting machines (EVMs) and voter verifiable paper audit trails (VVPATs).

8.2 The 2024 Constitutional Amendment Bills

The Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024 proposed the insertion of a new Article 82A, which would empower the President to issue an 'Appointed Date' the date from which simultaneous elections would commence. It proposed amendments to Articles 83 and 172 to provide for truncated terms following premature dissolution. The Union Territories Laws (Amendment) Bill, 2024 made corresponding changes for Union Territories with Legislatures.

The Bills were introduced in the Lok Sabha in December 2024 and referred to a Joint Parliamentary Committee (JPC) for detailed scrutiny. As of the date of this paper's research completion, the JPC had been

²⁹ German Basic Law (Grundgesetz) Art 67(1): 'The Bundestag can express its lack of confidence in the Federal Chancellor only by electing a successor by the vote of a majority of its members and by requesting the Federal President to dismiss the Federal Chancellor.' For the application of this mechanism see Donald P. Kommers & Russell A. Miller, *The Constitutional Jurisprudence of the Federal Republic of Germany* (3rd edn, Duke University Press 2012) ch 4.

constituted but had not yet submitted its report. The Bills thus remain at a formative stage of the legislative process, making this an opportune moment for constitutional analysis.

8.3 Constitutional and Procedural Concerns with the Bills

The 2024 Bills have attracted several specific constitutional criticisms. First, the amendment to Article 172 which relates to State Assemblies may require ratification by at least half the State Legislatures under Article 368(2)(b), since it touches on the constitutional relationship between the Union and the States in matters of governance. The Bills, as introduced, do not appear to contemplate this requirement, which raises questions about their constitutional validity.

Second, the creation of a new Article 82A, vesting in the President the power to declare an 'Appointed Date,' concentrates significant constitutional power in the executive. The President acts on the aid and advice of the Council of Ministers (Article 74(1)), meaning this power would effectively be exercised by the Union Cabinet. Granting the Union Cabinet the power to set the commencement date of a synchronised electoral cycle creates scope for partisan manipulation of the timing of elections the very concern that the ECI's independent constitutional status is designed to guard against.

Third, the proposal for a single electoral roll while administratively beneficial must be carefully calibrated to ensure that it does not result in the ECI, a Union-level constitutional body, exercising exclusive control over electoral rolls for State elections. Article 243K of the Constitution vests the superintendence, direction, and control of the preparation of electoral rolls for elections to municipalities and panchayats in the State Election Commission. A uniform electoral roll that overrides State Election Commission jurisdiction must be carefully structured to avoid constitutional conflict.

8.4 Political Economy of ONOE

Beyond the constitutional analysis, the political economy of ONOE requires attention. The proposal has been advanced by the ruling Bharatiya Janata Party (BJP) at a time when the party commands significant national support but faces strong regional competition. Critics have alleged and the allegation has some structural credibility that simultaneous elections tend to benefit nationally organised parties with the resources to run simultaneous campaigns across all States, to the detriment of regional parties with limited national infrastructure. The constitutional design of any ONOE framework must therefore include safeguards to ensure that electoral financing, campaign access, and media coverage do not tilt the competitive balance systematically in favour of national parties.

IX. Conclusions And Recommendations

9.1 Conclusion: This paper has examined the ONOE proposal through multiple constitutional lenses. The analysis yields the following principal findings:

First, ONOE is not per se unconstitutional. The Constitution does not prohibit simultaneous elections; indeed, the first two general elections of India were conducted simultaneously. The implementation of ONOE through constitutional amendment is therefore possible in principle.

Second, however, the manner of implementation matters enormously. Amendments that curtail the terms of State Assemblies following premature dissolution, that vest in the Union executive the power to set the electoral calendar, or that impose a uniform electoral roll without preserving State Election Commission autonomy raise serious constitutional concerns under Articles 83, 172, 368, and the federal features of the basic structure.

Third, the basic structure doctrine and specifically the federal character of the Constitution and the democratic form of government constrains the scope of ONOE amendments. If simultaneous elections, in combination, systematically reduce State electoral autonomy, diminish representational accountability, or privilege national parties over regional political expression, the amendments risk challenge before the Supreme Court on basic structure grounds.

Fourth, alternative constitutional mechanisms including a constructive vote of no-confidence, strengthening of the Tenth Schedule's anti-defection provisions, and fixed-term legislative reform may achieve ONOE's stated objectives of stability and reduced electoral disruption without requiring the structural alteration of the federal electoral framework.

9.2 Recommendations

Based on the constitutional analysis, this paper makes the following recommendations:

(i) **State Ratification:** Any constitutional amendment affecting the term or dissolution of State Assemblies should be presented for ratification by at least half the State Legislatures under Article 368(2). This is both constitutionally advisable and politically necessary to establish federal consensus for the reform.

(ii) **Independent Appointed Date Mechanism:** The power to fix the 'Appointed Date' for simultaneous elections should vest in the Election Commission of India rather than the President/Union Cabinet, to insulate the commencement of the ONOE cycle from partisan manipulation.

(iii) **Proportional Residual Terms:** In the event of premature dissolution, the ONOE framework should provide for a fresh five-year mandate for the newly elected legislature rather than a truncated residual term, at least in the first ONOE cycle. Alternatively, if the residual-term model is adopted, a minimum threshold say, no truncation if the residual term is less than one year should be prescribed.

(iv) **Constitutional Safeguards for Regional Parties:** ONOE legislation should include electoral finance provisions, media access rules, and campaign spending norms specifically designed to prevent national parties from gaining systematic advantage over regional parties through the simultaneity of elections.

(v) **Constructive Vote of No-Confidence:** Parliament should consider introducing a constructive vote of no-confidence mechanism, modelled on the German Grundgesetz, for both the Lok Sabha and State Assemblies. This reform, achievable through an amendment to Articles 75 and 164, would significantly reduce the incidence of premature dissolutions that ONOE seeks to manage.

(vi) **Sixth Schedule and Tribal Areas:** ONOE must explicitly address the position of tribal areas in the Sixth Schedule, where distinct constitutional governance arrangements apply. The interaction between ONOE's synchronisation mandate and the Autonomous District Council elections in States like Assam, Meghalaya, Mizoram, and Tripura requires careful constitutional mapping.

(vii) **Phase I Implementation with Review:** If ONOE is to be implemented, a phased approach beginning with the synchronisation of Lok Sabha elections with two or three willing State Assemblies before full national rollout would allow for empirical assessment of the proposal's constitutional and democratic effects before it is irreversibly embedded in the constitutional framework.

9.3 Final Observations

The debate over One Nation One Election is ultimately a debate about the kind of democracy India wishes to be. It is a debate about whether the administrative convenience of electoral synchronisation justifies the constitutional restructuring of federal electoral autonomy. It is a debate about whether the Model Code of Conduct's disruption to governance outweighs the democratic value of staggered, contextually rooted State elections. And it is a debate about whether the Indian Constitution's federal compact painstakingly crafted by the Constituent Assembly to balance unity and diversity can accommodate a reform of this magnitude without losing something essential.

The answer this paper offers is cautious but not prohibitive: ONOE can be constitutionally accommodated, but only if it is structured with rigorous attention to federal safeguards, democratic accountability, State consent, and independent electoral administration. An ONOE framework that is rushed through Parliament without State consultation, that vests excessive power in the Union executive, and that ignores the representational concerns of regional parties and smaller States will not only be constitutionally vulnerable it will also fail to achieve its stated objectives of democratic deepening and governance improvement.

India's Constitution is a living document, built on the principle of constitutional morality rather than the morality of the majority. Any reform as significant as One Nation One Election must be assessed not merely by the efficiency gains it promises, but by the constitutional values it upholds or undermines. The future of Indian federalism depends, in no small measure, on how wisely this choice is made.

References:

Constitutional Provisions

[1] Constitution of India, 1950: Arts. 74, 75, 83, 85, 163, 164, 172, 174, 243K, 324-329A, 352, 356, 368; Seventh Schedule; Tenth Schedule.

Cases

- [1] Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225 (Supreme Court of India).
- [2] Indira Nehru Gandhi v. Raj Narain, AIR 1975 SC 2299.
- [3] S.R. Bommai v. Union of India, (1994) 3 SCC 1.
- [4] Kihoto Hollohan v. Zachillhu, (1992) 1 SCC 309.
- [5] Minerva Mills Ltd. v. Union of India, (1980) 3 SCC 625.
- [6] I.R. Coelho v. State of Tamil Nadu, (2007) 2 SCC 1.
- [7] Union of India v. Association for Democratic Reforms, (2002) 5 SCC 294.
- [8] State of West Bengal v. Union of India, AIR 1963 SC 1241.

Official Reports and Documents

- [1] High-Level Committee on Simultaneous Elections (Kovind Committee), Report on One Nation One Election (March 2024), Government of India.
- [2] Law Commission of India, 170th Report on Reform of the Electoral Laws (1999).
- [3] Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice, 79th Report on Feasibility of Holding Simultaneous Elections (2015).
- [4] NITI Aayog, Discussion Paper on Simultaneous Elections in India (January 2017).
- [5] Election Commission of India, Annual Report 1983.
- [6] The Constitution (One Hundred and Twenty-Ninth Amendment) Bill, 2024 (introduced in Lok Sabha, December 2024).
- [7] The Union Territories Laws (Amendment) Bill, 2024.

Books and Articles

- [8] M.P. Singh & Rekha Saxena, Indian Politics: Constitutional Design and Voting Behaviour (4th ed., PHI Learning, 2020).
- [9] Granville Austin, The Indian Constitution: Cornerstone of a Nation (Oxford University Press, 1966).
- [10] H.M. Seervai, Constitutional Law of India (4th ed., Universal Law Publishing, 1996), Vol. I-III.
- [11] V.N. Shukla, Constitution of India (13th ed., Eastern Book Company, 2017).
- [12] S.K. Mendiratta, Simultaneous Elections: One Nation, One Election (Vitasta Publishing, 2018).
- [13] Subhash C. Kashyap, Our Constitution: An Introduction to India's Constitutional Law (NBT, 2014).

Minnesota Journal of Business Law and Entrepreneurship

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ISSN: 1540-3270

- [14] Mahendra Pal Singh, 'Federalism as a Basic Feature of the Indian Constitution' (2016) 4 Indian Law Review 1.
- [15] Arghya Sengupta, 'Simultaneous Elections: A Constitutional Appraisal' (2018) 53 Economic & Political Weekly 34.
- [16] Sujit Choudhry & Madhav Khosla, 'Simultaneous Elections and Indian Federalism' in Choudhry et al. (eds), *The Oxford Handbook of the Indian Constitution* (OUP, 2016).
- [17] N. Jayaram, 'Electoral Cycles and the Fragmentation of Indian Federalism' (2021) 12(2) *Journal of Indian Politics* 45.
- [18] German Basic Law (Grundgesetz), Art. 67 (Constructive Vote of No-Confidence).
- [19] Constitution of South Africa, 1996, ss. 49–53 (National Assembly), 105–109 (Provincial Legislatures).
- [20] Election Commission of India, *Compendium of Instructions on Model Code of Conduct* (2024 ed.).
- [21] Prashant Jha, 'One Nation, One Election: The Federal Challenge' *Hindustan Times* (24 March 2024).