

IN THE SUPREME COURT OF INDIA
ORIGINAL WRIT JURISDICTION
[Order XXXVIII of SCR, 2013]
WRIT PETITION (CRL) NO. _____ OF 2020
(Under Article 32 of the Constitution of India)

IN THE MATTER OF:-

ARNAB RANJAN GOSWAMI

PETITIONER

VERSUS

UNION OF INDIA & ORS.

RESPONDENTS

WITH

I.A. NO. _____ OF 2020:

APPLICATION FOR AD-INTERIM EX-PARTE STAY

PAPER BOOK

(FOR INDEX PLEASE SEE INSIDE)

ADVOCATE FOR THE PETITIONERS: PRAGYA BAGHEL

PROCEEDINGS

S. No.	DATE OF RECORD OF PROCEEDINGS	PAGES
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“A-1”

PROFORMA FOR FIRST LISTING

SECTION:X

The case pertains to (Please tick/check the correct box):N/A

- Central Act : Constitution of India
- Section : Article 32
- Central Rule: N/A
- Rule No(s) : N/A
- State Act : N/A
- Section : N/A
- State Rule : N/A
- Rule No(s) : N/A
- Impugned Interim Order : N/A
- Impugned Final Order/Decree: N/A
- High Court/Trial Court: N/A
- Name of Judges: N/A
- Tribunal/Authority : N/A
1. Nature of Matter : Civil **Criminal**
2. (a) Petitioner/Appellant No.1 : ARNAB RANJAN GOSWAMI.
(b) e-mail ID : N/A
(c) Mobile Phone Number : N/A
3. (a) Respondent No.1 : UNION OF INDIA & Ors
(b) E-mail ID : N/A
(c) Mobile Phone Number : N/A
4. (a) Main category classification : 06
(b) Sub-classification : 0603
5. Not to be listed before : N/A
6. (a) Similar disposed of matter : No similar matter is disposed
with citation, if any, & case off
details
- (b) Similar pending matter with : No similar matter is pending
case details

“A-2”

7. CRIMINAL MATTERS : YES
- (a) Whether accused/convict has surrendered?

YES	NO
-----	----
- (b) FIR No. : 238 of 2020, 245 of 2020, 180 of 2020 & 176 of 2020
- (c) Police Station. : Nagpur, Durg & Raipur
- (d) Sentence Awarded : N/A
- (e) Period of sentence : N/A
undergone including period of detention/custody undergone.
8. LAND ACQUISITION MATTERS: N/A
- (a) Date of Section 4 Notification : N/A
- (b) Date of Section 6 Notification : N/A
- (c) Date of Section 17 Notification : N/A
9. TAX MATTERS: State the tax effect : N/A
10. SPECIAL CATEGORY (First Petitioner/Appellant only) : N/A
- Senior Citizen, SC/ST, Woman/Child, Disabled, Legal Aid, Case In Custody N/A
11. Vehicle number (in case of Motor Accident Claim matters) : **N/A**

Date: 23.04.2020

Filed by:

[PRAGYA BAGHEL]
AOR for Petitioner(s)/Appellant(s)
A-207 LGF, Defence Colony,
New Delhi
CODE No. : 1841

Email: pragysingh@gmail.com

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SYNOPSIS

The present writ petition under Article 32 of the Constitution of India is being filed praying for the quashing of near identical criminal complaints/FIRs filed across the country against the Petitioner and for a stay of coercive action based on the case during the pendency of the present petition.

The facts giving rise to the petition are that the Petitioner is a news anchor and Editor-in-Chief of a news channel by the name Republic TV. The Petitioner had conducted a programme/debate on Republic TV on 21 April in respect of an incident at Palgarh Maharashtra where 3 persons were lynched and subsequently died despite police presence.

A question of huge public importance arises in the instant matter with respect to the freedom of press which has been long recognised by this Hon'ble Court to be protected under Article 19(1)(a) of the Constitution.

However, various complaints have been filed by a particular political party (which happens to be in power in the State of Maharashtra) in different locations all over the country under Sections 153, 153-A, 153-B, 295-A,

188, 290, 298, 500, 504(2), 505(2), 506, 120-B and 117 of Indian Penal Code. Some of which have been registered as FIRs.

Furthermore, on 23 April 2020 at around 12:30 - 1 A.M., the Petitioner and his wife, while returning from their news studio in Worli by car, were attacked by two individuals on a motorcycle, who when confronted by Petitioner's security officials, claimed to be members of the Congress party. Immediately thereafter, the Petitioner filed a complaint before the NM Joshi police station in Mumbai and an FIR has since been registered.

It is respectfully submitted that such action amounts to an attempt to muzzle the constitutional right to the freedom of press under Article 19(1)(a) apart from being illegal. This Hon'ble Court in *Romesh Thapar case* [(1950) SCR 594] has held that the freedom of speech and expression includes freedom of propagation of ideas and that this freedom is ensured by the freedom of circulation and that this right is the foundation of all democratic organisations and is essential for the proper functioning of the processes of democracy. In any case, the Complaints do not make out any case against the Petitioner in terms of the test laid down in *Bhajan Lal's case* 1992 Supp 1 SCC 335.

D

Since it is impossible for the Petitioner to approach various courts/police stations all over the country in respect of such FIRs/Complaints, the present writ petition is being filed under Article 32 of the Constitution of India for violation of the fundamental rights guaranteed under Article 19(1)(a) and Article 21 of the Constitution of India. This Hon'ble Court has in similar circumstances inasmuch as where multiple FIRs with near identical allegations were lodged against an accused, granted relief of bail in a writ petition in *Satvinder Singh Bhasin v. Govt of NCT* (2019) 10 SCC 800 and more recently in *Asif Malkani v. Union of India* WP (Criminal) No. 353/2019 by order dated 13.01.2020.

Hence the instant writ petition.

LIST OF DATES

Dates	Particulars
16.04.2020	<p>On 16 April 2020, three individuals which included two Hindu sadhus aged 70 years and 35 years, in the presence of 10 policemen and forest guards, were brutally lynched and killed by a mob in Gadchinchle village in Palghar district in Maharashtra. This lynching of the Hindu priests by a mob, while the priests were in the custody of policemen, has still not been investigated as to the actual cause and reason behind this killing. This unfortunate incident was widely reported by the print and electronic media including by the news channels of the Petitioner. In fact, a video recording of this actual lynching by the mob is in public domain and within the full knowledge of the investigating authorities, government and media personnel.</p>
21.04.2020	<p>On 21 April 2020, the Petitioner hosted a debate on R. Bharat in relation to the Palghar incident in a news show called 'Poochta hai Bharat'. This show is popular among the</p>

	<p>masses and is known to raise questions warranting discourse on matters of public interest. The debate was attended by various panelists to put across their point of view in relation to the Palghar incident. Copy of the broadcast aired on R. Bharat on 21 April 2020 will be produced at the time of hearing and is available at https://www.youtube.com/watch?v=C2i4MMpKu9I</p>
	<p>Following the above broadcast, there was a well-coordinated, widespread, vindictive and malicious campaign launched by the Congress and its activists against the Petitioner. This campaign was carried out online through news reports and tweets indicating that members of the Congress have filed multiple complaints simultaneously, against the Petitioner before various police stations in the country, seeking registration of FIR and investigation into the offences allegedly committed by the Petitioner in connection with the reporting of the Palghar incident and the questions raised in the debate. Various members of the Indian National Congress demanded the</p>

	<p>immediate arrest of the Petitioner by using the #ArrestAntiIndiaArnab.</p>
	<p>To the best of Petitioner's knowledge, complaints have also been filed against him by members of the Congress in different parts of the country (including multiple complaints in the same state) before different police stations in Chhattisgarh, Madhya Pradesh, Rajasthan, Jharkhand, Jammu and Kashmir and Telangana. Incidentally, all these states are presently under the rule of the Congress and the Petitioner believes that the machinery of these State(s) have been set in motion with an oblique and ulterior motive and without due and proper application of mind</p>
22.04.2020	<p>On 22 April 2020, two FIRs were registered against the Petitioner in respect of the complaints filed by Congress activists in Raipur (FIR No. 176 of 2020 - Civil Lines police station) and Nagpur (FIR No. 238 of 2020 - Nagpur city</p>

	police station) in relation to the Petitioner's reporting of the Palghar incident
23.04.2020	On 23 April 2020 at around 12:30 - 1 A.M., the Petitioner and his wife, while returning from their news studio in Worli by car, were attacked by two individuals on a motorcycle, who when confronted by Petitioner's security officials, claimed to be Congress members. Immediately thereafter, the Petitioner went to the NM Joshi police station in Mumbai to file a complaint, requesting the police to take appropriate action against the individuals who had attacked him and his wife. While the police initially refused to take Petitioner's complaint, after some persistence, a FIR was registered by the police on 23 April 2020 against unknown persons
23.04.2020	Hence the Writ Petition

**IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION**

WRIT PETITION (CRIMINAL) NO. _____ OF 2020

(Petition under Article 32 of the Constitution of India read with
Order XXXVIII of the Supreme Court Rules, 2013)

IN THE MATTER OF:

ARNAB RANJAN GOSWAMI
RESIDING AT B -1701/1702,
RAHEJA ATLANIS CHS, G.K MARG,
LOWER PAREL – 400 013,
DIST. MUMBAI.

...PETITIONER

VERSUS

1. UNION OF INDIA,
Through the Secretary,
Ministry of Home Affairs
North Block
New Delhi - 110001
India
2. STATE OF MAHARASHTRA,
Through the Secretary,
Home Department,
New Administrative Building,
9TH floor, Opp. Mantralaya,
Mumbai-400032
3. STATE OF CHHATTISGARH,
Through the Secretary,
D.K.S. Bhawan, Mantralaya, Raipur,
Chhattisgarh – 492001

4. STATE OF MADHYA PRADESH,
Through the Secretary,
Home Department,
Government of Madhya Pradesh
3rd Floor, Vallabh Bhavan-II,
Govt. of Madhya Pradesh
4 th Floor, Mantralaya,
Vallabh Bhavan-I
Bhopal,
Madhya Pradesh – 462004
5. STATE OF RAJASTHAN
Through the Secretary,
C Scheme, Ashok Nagar, Jaipur,
Rajasthan 302007
6. STATE OF JAMMU AND KASHMIR
R. No. 3/21, 3rd, Floor Main Building,
Civil Secretariat,
Jammu - 180001
7. STATE OF TENLANGANA
Through the Secretary,
Tankbund, Basheer Bagh,
Near NTR Gardens,
Opposite Lumbini Park,
Telangana 500022

...All are Contesting Respondents

**WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION OF INDIA SEEKING QUASHING OF
FIRST INFORMATION REPORTS REGISTERED
AGAINST THE PETITIONER IN THE STATES OF
MAHARASHTRA AND CHHATTISGARH AND NO
COERCIVE STEPS IN RELATION TO ANY FIR
WHICH MAY BE REGISTERED IN CONNECTION
WITH THE BROADCASTS AIRED ON REPUBLIC
TV/R. BHARAT ON 16 APRIL 2020 AND 21 APRIL 2020
AND THE COMPLAINTS FILED AGAINST THE
PETITIONER IN RELATION TO SUCH BROADCASTS**

TO
THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUSTICES OF
THE HON'BLE SUPREME COURT OF INDIA.

THE HUMBLE PETITION OF
THE PETITIONER ABOVE NAMED.

MOST RESPECTFULLY SHEWETH:

1. The Petitioner is a citizen of India and is working for gain at the address mentioned above. The Petitioner is a journalist by profession and the Editor-in-Chief of Republic TV, one of the leading English news channels in India and the Managing Director of ARG Outlier Media Asianet News Private Limited (**ARG**). ARG also owns and operates a Hindi news channel in the name of R. Bharat on which the Petitioner anchors news shows.
2. The Petitioner is filing the present petition in extremely urgent circumstances as several FIRs have been registered against him in different parts of the country and has reasonable and tangible grounds to believe that other FIRs will also be registered at the behest of the Indian National Congress

(Congress) members in gross violation of his fundamental rights, including but not limited to the right of freedom of speech and expression as guaranteed under Article 19 (1) (a) and right to life and personal liberty guaranteed under Article 21 of the Constitution of India, 1950. The FIRs which have been already registered against the Petitioner and the ones which are anticipated are in relation to the broadcasts aired on Republic TV on 16 April 2020 and R. Bharat on 21 April 2020, which were in connection with the comments given by a member of Congress in relation to India's COVID-19 testing measures and the unfortunate lynching of 3 individuals (including 2 priests) in Palghar on 16 April 2020.

3. In relation to the broadcasts, multiple complaints have been filed and FIRs have been registered against the Petitioner all over the country. The details of the FIRs registered against the Petitioner are as follows:

Maharashtra

FIR No. 238 of 2020, dated 22 April 2020, registered at Police Station Sadar, District Nagpur City, Maharashtra, under sections sections 153, 153-A, 153-B, 295-A, 298, 500, 504 (2), 506, 120-B and 117 of the Indian Penal Code 1860.

Chhattisgarh

- (i) FIR No. 245 of 2020, dated 22 April 2020, registered at Police Station Supela, District Durg, Chhattisgarh, under sections 153-A, 295-A and 505 (2) of the Indian Penal Code 1860.
- (ii) FIR No. 180 of 2020, dated 23 April 2020, registered at Police Station Bhilai Nagar, District Durg, Chhattisgarh, under sections 153-B, 188, 290 and 505 (1) of the Indian Penal Code 1860.
- (iii) FIR No. 176 of 2020, dated 22 April 2020, registered at Police Station Civil Lines, District Raipur, Chhattisgarh, under sections 153-A, 295-A and 505 (2) of the Indian Penal Code 1860.

It may be noted that the FIRs which have been registered against the Petitioner are in states ruled by the Congress government or its alliances.

4. The Complaints and the FIRs are false, vindictive, frivolous, malicious, precipitated with malice, untenable in law and have been filed with *mala-fide* intent by the Congress activists to coerce, harass and intimidate the Petitioner in order to muzzle the media and in particular the Petitioner, from carrying these news reports and conducting investigative journalism to bring the truth before the public. The Complaints and FIRs are a part of well-coordinated and malicious campaign by the Congress and its members of instituting false and baseless complaints against the Petitioner before different police stations simultaneously in various parts of the country with request to register FIR and investigate the matter in relation to same set of facts. The present petition has been filed in the facts and circumstances mentioned below:

5. On 16 April 2020, three individuals which included two Hindu sadhus aged 70 years and 35 years, in the presence of 10 policemen and forest guards, were brutally lynched and killed by a mob in Gadchinchle village in Palghar district in Maharashtra. This lynching of the Hindu priests by a mob, while the priests were in the custody of policemen, has still not been investigated as to the actual cause and reason behind this killing. This unfortunate incident was widely reported by the print and electronic media including by the news channels of the Petitioner. In fact, a video recording of this actual lynching by the mob is in public domain and within the full knowledge of the investigating authorities, government and media personnel.
6. On 21 April 2020, the Petitioner hosted a debate on R. Bharat in relation to the Palghar incident in a news show called 'Poochta hai Bharat'. This show is popular among the masses and is known to raise questions warranting discourse on matters of public interest. The debate was attended by various panelists to put across their point of view in relation to the Palghar incident. Copy of the broadcast aired on R. Bharat on

21 April 2020 will be produced at the time of hearing and is available

at <https://www.youtube.com/watch?v=C2i4MMpKu9I>.

7. A review of the above debate would show that its thrust was to question the tardy investigation, inconsistent versions of the authorities and the administration and the State Government's silence on the Palghar incident given that the unfortunate incident happened in Maharashtra which is presently under rule of an alliance government jointly formed by Shiv Sena, the Congress and the Nationalist Congress Party. The debate highlighted the manner in which the incident was being portrayed by the authorities, including the glaring fact that the incident occurred in the presence of numerous police officials which fact was initially suppressed.
8. Following the above broadcast, there was a well-coordinated, widespread, vindictive and malicious campaign launched by the Congress and its activists against the Petitioner. This campaign was carried out online through news reports and tweets indicating that members of the Congress have filed

multiple complaints simultaneously, against the Petitioner before various police stations in the country, seeking registration of FIR and investigation into the offences allegedly committed by the Petitioner in connection with the reporting of the Palghar incident and the questions raised in the debate. Various members of the Indian National Congress demanded the immediate arrest of the Petitioner by using the **#ArrestAntiIndiaArnab**. Some of the news reports and tweets are annexed hereto and marked as **Annexure P-1** . These news reports and tweets clearly demonstrate the malicious, vindictive and sinister campaign by the Indian National Congress to muzzle the media and to stop the Petitioner from raising pertinent questions concerning a matter of public interest.

9. To the best of Petitioner's knowledge, complaints have also been filed against him by members of the Congress in different parts of the country (including multiple complaints in the same state) before different police stations in Chhattisgarh, Madhya Pradesh, Rajasthan, Jharkhand, Jammu and Kashmir and Telangana. Incidentally, all these states are presently

under the rule of the Congress and the Petitioner believes that the machinery of these State(s) have been set in motion with an oblique and ulterior motive and without due and proper application of mind. A list of the complaints filed by Congress activists against the Petitioner in different States is annexed hereto and marked as **Annexure P-2**.

10. On 22 April 2020, two FIRs were registered against the Petitioner in respect of the complaints filed by Congress activists in Raipur (FIR No. 176 of 2020 - Civil Lines police station) and Nagpur (FIR No. 238 of 2020 - Nagpur city police station) in relation to the Petitioner's reporting of the Palghar incident. Various other complaints alleging the similar offences have also been filed by other members of the Congress against the Petitioner in other states as well which the Petitioner undertakes to produce at the time of hearing. All of this was done to intimidate the Petitioner and to stop the Petitioner from asking pertinent factual questions to the Chief of the Indian National Congress and other members on his shows which are aired on Republic TV and R Bharat, and watched by the whole country.

11. Notwithstanding the multiple complaints and FIRs against him, the Petitioner continued to conduct his regular shows on Republic TV/R. Bharat. On 23 April 2020 at around 12:30 - 1 A.M., the Petitioner and his wife, while returning from their news studio in Worli by car, were attacked by two individuals on a motorcycle, who when confronted by Petitioner's security officials, claimed to be Congress members. Immediately thereafter, the Petitioner went to the NM Joshi police station in Mumbai to file a complaint, requesting the police to take appropriate action against the individuals who had attacked him and his wife. While the police initially refused to take Petitioner's complaint, after some persistence, a FIR was registered by the police on 23 April 2020 against unknown persons, a copy of which is annexed hereto and marked as **Annexure P-3**. In light of this attack which has compromised the safety and security of the Petitioner and his family members, the Petitioner strongly apprehends that similar attacks may be planned against hi, his family and his colleagues at Republic TV/R. Bharat. Accordingly, it is just and expedient that the Petitioner seeks appropriate protection

from the Central Government to the offices of the Petitioner in New Delhi and Mumbai.

12. Contrary to the tenor of allegations in the complaints filed against the Petitioner, the Petitioner has time and again encouraged and used the platform of its channel to foster communal harmony, especially in the present critical time of the COVID-19 pandemic. In fact, the Petitioner has been strongly opposed to any propagation of any communalization by various other political parties for their own vested interests. It is inconceivable that the broadcast aired on 21 April 2020 in relation to the Palghar incident could have incited any communal tension and it is apparent that only one political party is taking offence on the broadcast.

13. The above-mentioned facts clearly demonstrate that a prominent national level political party and its members harbor ill-will, hatred and personal vendetta against the Petitioner. The complaints have been filed and FIRs registered with the sole intention to wreak vengeance against the

Petitioner on account of personal animosity of the Chief of the Congress against the Petitioner for the following reasons:

- (i) The Petitioner's news channels have been at the forefront for seeking justice for the Palghar victims, including posing tough questions to the State Government in Maharashtra and its allies.

- (ii) The Petitioner has been instrumental in exposing fake news spread by the Indian National Congress in relation to the treatment of COVID-19 patients in Ahmedabad, number of COVID-19 tests conducted by India, availability of hydroxychloroquine in India etc.

14. Under these circumstances, the Petitioner begs to approach this Hon'ble Court for urgent relief of quashing of the FIRs, pending this petition, no coercive action against the Petitioner in respect of the FIRs, including any FIRs which may be registered pursuant to the present Complaints or which may be filed in the future on the basis of the same broadcasts, on the

following amongst other grounds, which are without prejudice to one another:

GROUND

- (a) FOR THAT various Complaints have been filed and FIRs registered on politically motivated grounds, precipitated with malice against the Petitioner. In particular, these complaints have been filed at the behest of a political party to muzzle the fundamental right to free speech and expression guaranteed under Article 19 (1) (a) of the Constitution of India, 1950 and to infringe upon his right to life and personal liberty guaranteed under Article 21 of the Constitution.
- (b) FOR THAT the Complaints and the FIRs are a part of a well-coordinated and orchestrated, widespread and malicious campaign against the Petitioner by a political party, which is evident from multiple complaints, filed within a short period of time, in the country predominantly in States where that very political party is in power either on its own or with allies, with requests to register FIR's and investigate the matter.

- (c) FOR THAT the members of the youth wing of the same political party brutally attacked the Petitioner and his wife, also an Editor of Republic TV, when they left the studio early morning on 23 April 2020 in their car and even though the Mumbai police personnel appointed as the security detail of the Petitioner confirmed to the officers of the NM Joshi Marg Police Station, who were witness to the attack, that the attackers stated that they were members of the same political party, the police refused to cooperate and diluted the allegations in the FIR, indicating pressure from the State Government.
- (d) FOR THAT it is respectfully submitted that Complaints / FIRs ought not to be lodged to gag the media and prevent freedom of the press, which is a fundamental right under the Constitution of India.
- (e) FOR THAT the Complaints and the FIRs contain baseless and unsubstantiated allegations which are not borne out from

the broadcasts aired on the Petitioner's news channels in relation to the Palghar incident.

- (f) FOR THAT the allegations in the Complaints and the FIRs are merely conjectures and surmises based on a complete and vindictive misreading of only a miniscule part of the broadcast.
- (g) FOR THAT the Complaints and FIRs have been filed in quick succession against the Petitioner in various parts of the country.
- (h) FOR THAT the Petitioner has every right to debate upon to the unfortunate Palghar incident, which is a matter of public importance involving murder of two priests and their driver by a frenzy mob in the presence of more than 10 police personnel .
- (i) FOR THAT none of the ingredients of the offences as mentioned in the complaint and the FIR are made out and the

present is a fit case for this Hon'ble Court to quash all such FIR's in the interests of justice.

(j) FOR THAT this Hon'ble Court has taken the view in Satinder Singh Bhasin Vs. Government (NCT of Delhi) & Others [2019 (10) SCC 800] that in cases where there are a group of cases in different States, this Hon'ble Court can exercise jurisdiction under Article 32 of the Constitution and grant necessary relief.

(k) FOR THAT multiple Complaints and FIRs have been filed/registered against the Petitioner before various police stations across the country. The Petitioner would not be in a position to individually approach each such court, apart from the fact that there may be conflicting orders of various courts.

15. No other application is filed by the Petitioner in this Hon'ble court or the Hon'ble Supreme court touching the subject matter of the present application.

16. The Petitioner craves leave to produce additional documents in support of this application as and when required.

This Hon'ble Court may be pleased to issue the following prayers:

PRAYERS

The Petitioner, therefore, prays that-

- (a) Issue a writ of certiorari quashing the following Complaints/FIRs filed against the Petitioner as mentioned in **Annexure P-2**.
- (b) Issue a writ of mandamus to the effect that no cognizance of any complaint would be taken by any court nor any FIR registered by the police on the cause of action in the present Writ Petition.
- (c) Issue a writ of mandamus directing the Union of India to provide adequate safety and security to the Petitioner and his family members and his family and his colleagues at Republic TV/R. Bharat at various locations in the country. Accordingly, it is just and expedient that the Petitioner seeks appropriate

protection from the Central Government to the offices of the
Petitioner in New Delhi and Mumbai.; AND/OR

- (d) Issue or pass any writ, direction or order which this Hon'ble
Court may deem fit and proper under the facts and
circumstances of the case.

**AND FOR THIS ACT OF KINDNESS, THE PETITIONER SHALL AS IN
DUTY BOUND EVER PRAY.**

Filed By:

PRAGYA BAGHEL
(Advocate for the Petitioner)

NEW DELHI

FILED ON: 23/04/2020

**IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)**

WRIT PETITION (CIVIL) NO. 2020

IN THE MATTER OF :

ARNAB GOSWAMI

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

AFFIDAVIT

I, Arnab Goswami working for gaint NBW building, bombay dyeing mill compound, pb marg, worli, mumbai-400025, R/o , do hereby solemnly affirm and state as under:

1. That I am Petitioner in this case and as such I am well acquainted with the facts of the case. Hence, I am competent to swear this affidavit.

2. That I have read and understood the contents of the accompanying Synopsis and List of Dates (Pgs. A to A) and the contents of the Writ Petition (Pgs. 1 to 19) and accompanying I.A.s. I say that the same are true and correct to my knowledge and best belief and nothing material has been concealed therefrom.

3. That the annexures are true copies of their respective originals.

DEPONENT

VERIFICATION:

Verified at _____ on this the 23 day of 2020, that the content of the above Affidavit are true to my knowledge and best belief. No part of it is false and nothing material has been concealed therefrom.

DEPONENT



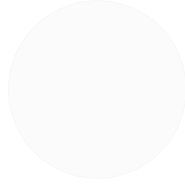
Explore

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22

Annexure P-1



Follow

Randeep Singh Surjewala ✓

@rssurjewala

Permanent Invitee Member, Congress Working Committee.
facebook.com/RSSurjewala/surjewala.in Joined March 2015

131 Following 1.2M Followers

Tweets

Tweets & replies

Media

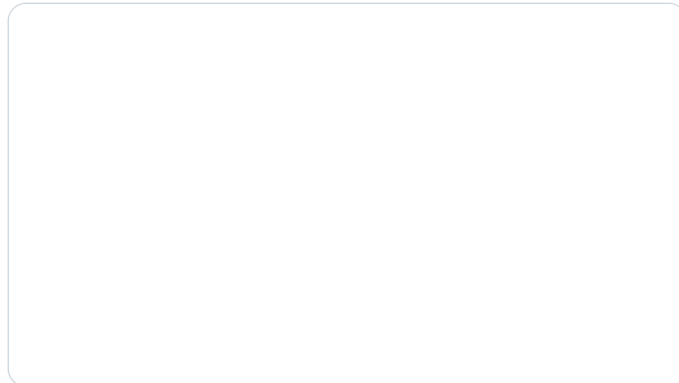
Likes

**Randeep Singh Surjewala** ✓ @rssurjewala · 10hगेहूँ खरीद के तीसरे दिन भी हरियाणा में खरीद व्यवस्था ठप्प।
चारों ओर हाहाकार, 70% मंडियां हड़ताल पर!

किसान-आढ़ती-मजदूर के गठजोड़ को तोड़ने का षडयंत्र कर रही खट्टर-दुष्पंत सरकार

या तो किसान का एक-एक दाना खरीदे,
वरना खट्टर-दुष्पंत चैटाला जी की जोड़ी सत्ता की चाबी छोड़ दे

हमारा बयान:



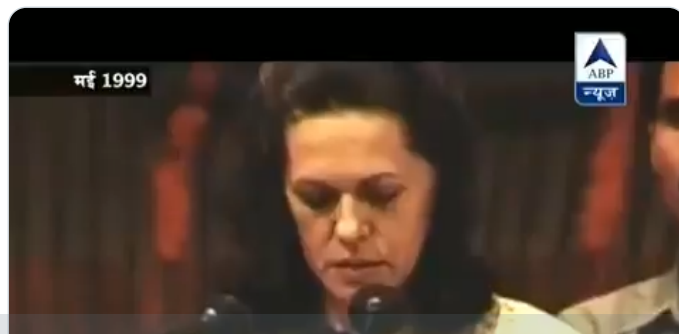
102

143

608

**Randeep Singh Surjewala** ✓ @rssurjewala · 11h

प्रधान मंत्री जी,

श्रीमती सोनिया गाँधी ने एक पत्नी, एक माँ और देश पर पति की कुर्बानी के बाद एक विधवा
के तौर पर देश सेवा का फ़र्ज़ निभाया, क्योंकि ये उनका भी वतन है।गंदी व फूहड़ भाषा बोलने वाले आपके चाटुकार टी.वी पत्रकार चाहे यह न समझ पाएँ पर
मर्यादा पुरुषोत्तम जनता पहचानती है।

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0:12 / 0:36

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23

3.3K

3.4K

11K



Randeep Singh Surjewala @rssurjewala · 12h

2/2

Let PM remember that Smt. Sonia Gandhi has spent over 50 years of life in India, serving the country & being a witness to sacrifice of her mother in law & husband.

But your favourite abusive anchors won't bat an eyelid before hurling filth.

Silence is acquiescence, Mr. PM!



43.3K views

0:01 / 2:00

1.2K

1.6K

5K



Randeep Singh Surjewala @rssurjewala · 12h

Randeep Singh Surjewala

8,861 Tweets

Follow

Deeply disgracetul that PM & BJP euologize this brand of TV anchors.
1/2



5.1K

5.9K

18.5K



Randeep Singh Surjewala Retweeted



Rahul Gandhi @RahulGandhi · 16h

Covid19 के शिकार सूक्ष्म, लघु, मध्यम उद्यम भी हैं जिन्हें ज़िंदा रखने के लिए आर्थिक पैकेज चाहिए।

पहले ही नाजुक अर्थव्यवस्था MSME के बिना एकदम चरमरा जाएगी।

इस आर्थिक पैकेज का रूप कैसा हो?
काँग्रेस पार्टी को अपने सुझाव दें:

voiceofmsme.in

#HelpSaveSmallBusinesses

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26.8K Tweets

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109.1K views

0:00 / 0:35

2.6K

5.7K

19.7K



Randeep Singh Surjewala Retweeted

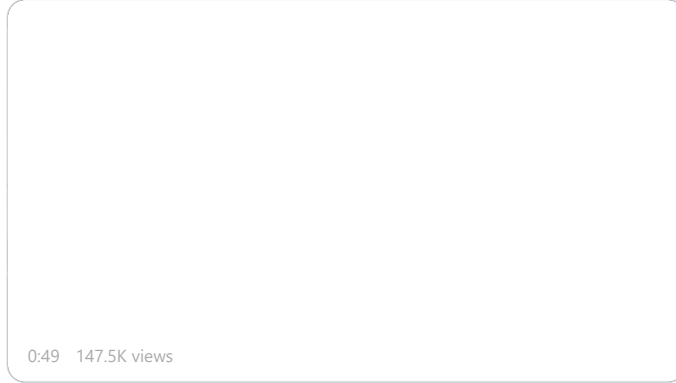
**Rahul Gandhi** @RahulGandhi · 17h

#COVID19 has devastated our micro, small & medium businesses (MSME). The Congress party needs your help. Send us suggestions & ideas for what a MSME economic stimulus package should cover on:

voiceofmsme.in

or our social media platforms.

#HelpSaveSmallBusinesses



1.9K

6.9K

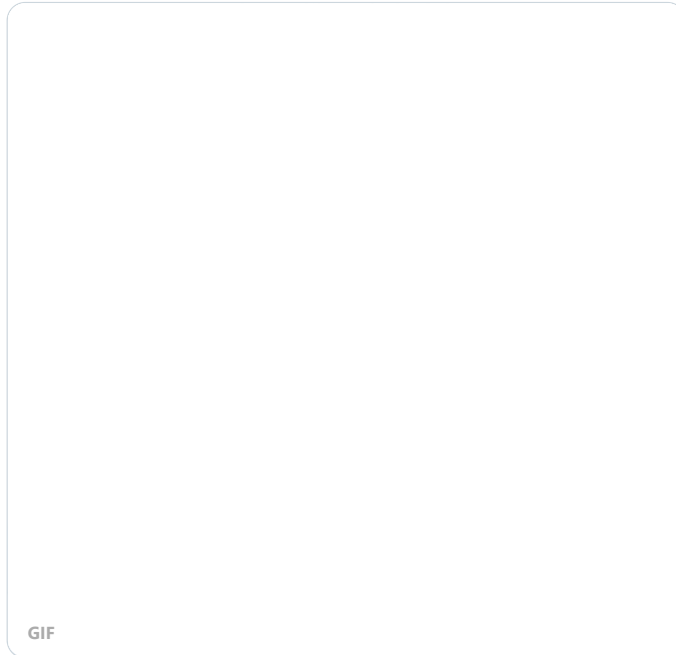
21.1K

**Randeep Singh Surjewala** @rssurjewala · 18h

हमारा लक्ष्य केवल स्वच्छ हवा, पानी व प्राकृतिक सुंदरता का वातावरण नहीं।

उद्देश्य अन्य सभी मनुष्यों व सभी जीवित प्राणियों के लिए शालीनता, गुणवत्ता व पारस्परिक सम्मान का वातावरण भी है।

#EarthDay2020 पर मिल कर कोरोना से लड़ने व पृथ्वी को सभी के लिए बेहतर बनाने की प्रतिज्ञा लें



63

176

800



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Bhupesh Baghel ✓

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@bhupeshbaghel

The Official Twitter Account of Bhupesh Baghel, Chief Minister, Chhattisgarh, India.

📍 Bhilai, India 🌐 facebook.com/BhupeshBaghelC... 📅 Joined May 2016

177 Following 226.7K Followers

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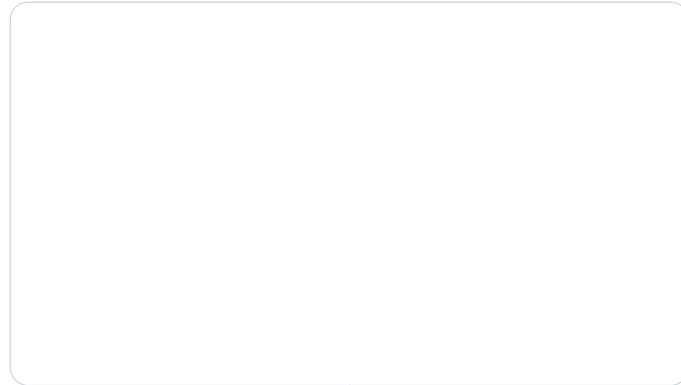
↳ Bhupesh Baghel Retweeted



INC Chhattisgarh ✓ @INCChhattisgarh · 7h

#FIR_Registered

माननीय प्रदेश अध्यक्ष मोहन मरकाम जी एवं स्वास्थ्य मंत्री टी एस सिंहदेव जी की शिकायत पर थाना सिविल लाईस रायपुर में अर्णब गोस्वामी के खिलाफ़ FIR दर्ज कर ली गयी है।



258

712

2K



Bhupesh Baghel ✓ @bhupeshbaghel · 6h

#CoronaVirusUpdate

2 और कोरोना पॉजिटिव मरीज स्वस्थ होकर AIIMS रायपुर के द्वारा डिस्चार्ज किये जा रहे हैं। आशा करता हूँ कि अन्य 8 मरीज भी जल्द स्वस्थ होंगे।

Two more corona positive patients are being discharged from AIIMS Raipur. I hope that Other 8 will also return home soon.

109

254

1.5K



Bhupesh Baghel ✓ @bhupeshbaghel · 10h

I urge News Broadcasters Association & the Editors Guild of India should take appropriate action against the editor and his channels. I hope his employers will ask him to resign immediately.

95

445

1.3K



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Bhupesh Baghel ✓ @bhupeshbaghel · 10h

Arnab Goswami of @republic & @Republic_Bharat calls this nonsensical utterance against Mrs. Sonia Gandhi journalism? There is no dignity towards any person or the language. This malicious attempt to incite communal violence is a cognizable, criminal and a punishable offence.

416

1.4K

4.3K



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TS Singh Deo
@TS_SinghDec



INC Chhattisgarh
@INCChhattisgarh

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.. "रिपब्लिक" को सबक सिखाने में सक्षम है।

306

857

3.2K



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Bhupesh Baghel

@bhupeshbaghel · 11h

रिपब्लिक और आर भारत टीवी के संपादक अर्णब गोस्वामी के इस अनर्गल बकवास को पत्रकारिता कह सकते हैं? यह तो सांप्रदायिक हिंसा भड़काने का कुत्सित प्रयास है। न भाषा की मर्यादा न किसी की मान मर्यादा का ध्यान। यह तो अपराध है। संज्ञेय और दंडनीय अपराध।

हमारे #रिपब्लिक का कानून फर्जी..

1.1K

3.9K

13.7K



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Bhupesh Baghel

@bhupeshbaghel · 15h

मैंने माननीय प्रधानमंत्री श्री नरेन्द्र मोदी जी को पत्र लिखकर छत्तीसगढ़ की खनन परियोजनाओं और औद्योगिक इकाईयों द्वारा प्रधानमंत्री केयर फंड में जमा की गई सी.एस.आर. की राशि को शीघ्र राज्य सरकार को अंतरित करने हेतु निर्देश देने का अनुरोध किया है। @PMOIndia

60

352

1.8K



Bhupesh Baghel

@bhupeshbaghel · 16h

..दोगुने 40000 भोजन थाली तक की सेवा दे चुका है। इस सेवाकार्य हेतु मैं श्री कैलाश चंद्र शर्मा, डा.बुजुमोहन शर्मा एवं राजेन्द्र शर्मा जी सहित ग्रुप के सभी सदस्यों को साधुवाद एवं धन्यवाद देता हूँ।

14

64

420



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Youth Congress @IYC · 5h
 .@mumbai_pyc Vice President @SurajThakurINC submits memorandum at Ghatkopar West Police station to register FIR against news channel @republic & Editor Arnab Goswami for hate mongering, inciting communalism and spreading fake news through his channel. #ArrestAntilIndiaArnab



1 3 6

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 **Youth Congress** ✓
@IYC

छत्तीसगढ़ के दंतेवाड़ा में जिला कांग्रेस कमेटी एवं युवा कांग्रेस पदाधिकारियों द्वारा नफरत का बीज बोने वाले अर्नव गोस्वामी के खिलाफ FIR दर्ज करने जशपुर थाने में ज्ञापन सौंपा,

देश के कोने कोने ने लगातार FIR दर्ज होने का सिलसिला जारी है ।
[#ArrestAntiIndiaArnab](#)



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@IYC [Follow](#)

The Official Twitter Account of The Youth Wing of Indian National Congress. RTs are Not Endorsements.

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Gursimran Singh Mand (INC)
@gursimranmand

@Kisan_Congress के वर्किंग अध्यक्ष भाई @SurenderAICC के निर्देशानुसार मैंने @INCIndia अध्यक्षता #SoniaGandhi जी के खिलाफ अभद्र भाषा का प्रयोग करने वाले पत्रकार @ArnabGoswamiRtv के खिलाफ पंजाब मे भी शिकायत दर्ज करवा दी है,

गांधी परिवार की बेइज्जती हम कभी भी बरदास्त नहीं करेगे

www.punjabpolice.gov.in/Comj

PUNJAB POLICE
Police to its last period is duty

» Your Complaint is Successfully Registered!
Your Complaint has been lodged successfully.
Complaint Number: 152589824
Please note down and keep the Complaint Number for follow up

Complaint Particulars	Description
Complaint Number	152589824
Complaint Submitted on	4/22/2020 10:54:05 PM
Subject	Any Other Dispute
Complaint Description	Dated: -22nd April 2020 To, The Commissioner Of Police, Ludhiana, Punjab, India ? Sub - FIR against Mr. Arnab Ranjan Goswami Managing Director, Editor-in-Chief, Co-Founder of Republic TV Channel under Section 117, 120B, 151, 153A, 295A, 298, 504, 505 and 506 of the Indian Penal Code, 1860 r/w Section 68A of the Information Technology Act, 2008. Regarding Mr. L. Gursimran Singh Mand, National Joint Coordinator Of All India Congress Committee (Kisan Congress), Aged 47, B/o: 79, Phase 1 Sarabha Nagar Extension Pakhawal Road Ludhiana, would like to bring to your kind notice the following details - I I say that on 21.04.2020, Mr. Arnab Ranjan Goswami - Managing Director, Editor-in-Chief, Co-Founder of Republic TV Channel, was hosting Puchha Bharat episode. This show is widely watched by many people of different folk of life in the entire country as well as worldwide. I I further mentionary in various parts of some in many to see more associate and threatened by these statements. Besides, such statements are bound to generate communal disharmony or feelings of ill will, enmity and hatred between different religious groups. It is also an act, which is prejudicial to the maintenance of harmony between different religious groups and is likely to disturb the public tranquility. S. I further s
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National Jt. Co-ordinator All India Congress Committee (Kisan Congress) | Ministry Of I&B xMember Film Censor Board, Govt.Of.India. | facebook.com/MandCo

Kisan Congress ✓
@Kisan_Congress [Follow](#)

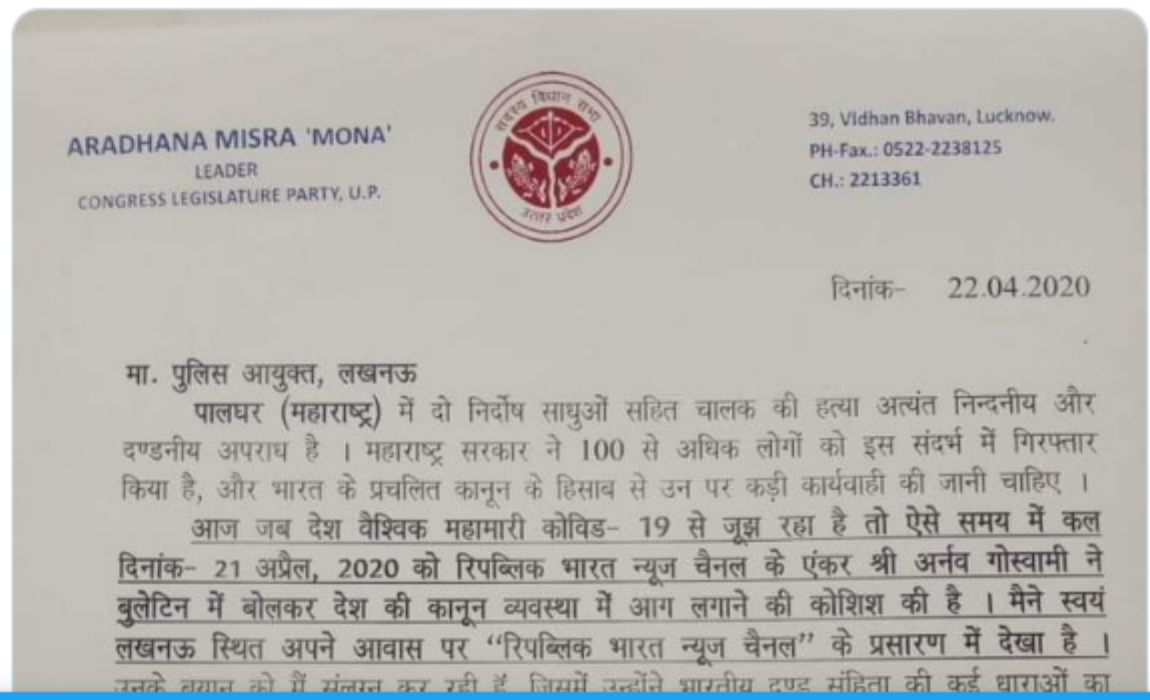
Official Twitter Account Of Kisan Congress AICC. Chairman Sh Nana Patole (MLA), Ex MP, Chairman Campaign Committee Maharashtra, Senior Leader of @INCIndia

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UP Congress ✓
@INCUttarPradesh

कांग्रेस नेता विधानमंडल श्रीमती @aradhanam7000 जी ने लखनऊ के पुलिस आयुक्त को पत्र लिखकर अर्णब गोस्वामी पर एक्शन लेने की मांग की।



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- UP Congress** ✓
@INCUttarPradesh
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- Aradhana Misra-M...** ✓
@aradhanam7000
Member of Legislative Assembly-UP @InclIndia Social Worker| Account managed by office of Aradhana Misra [Follow](#)

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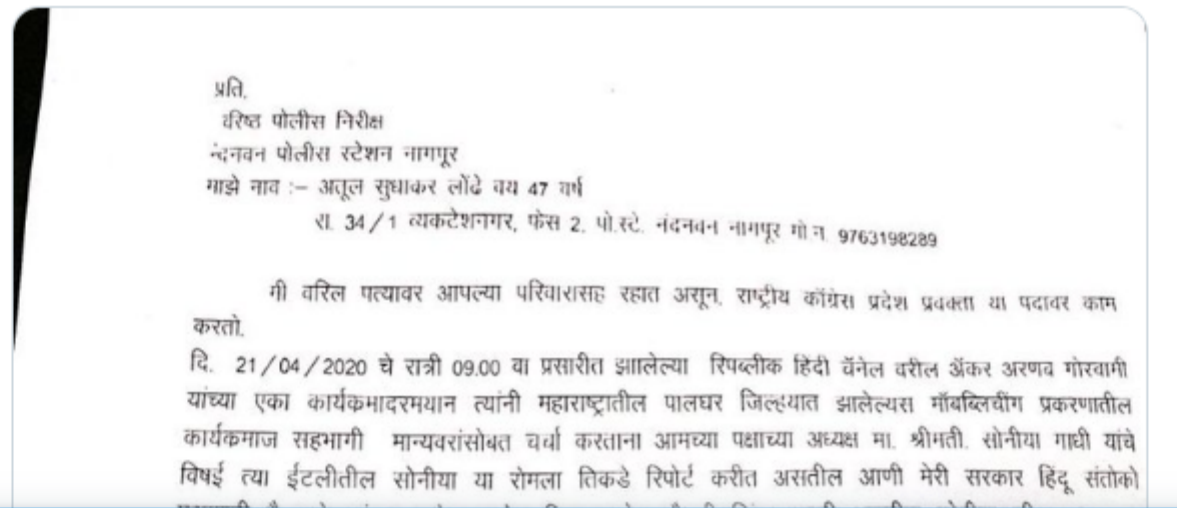
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Abhijit Sapkal @abhijitsapka1

.@INCMaharashtra spokesperson @atullondhe filed police complainant with @NagpurPolice against BJP's unofficial Spokesperson Arnab for his malicious & venomous comment against Smt Sonia Gandhi and his attempt create communal tension in Maharashtra. #ArrestAntiIndiaArnab



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- Abhijit Sapkal @abhijitsapka1
General Secretary & State Social Media Chairperson for @INCMaharashtra under the leadership of @RahulGandhi and @AshokChavanINC. Social activist
- Maharashtra Cong... @INCMaharashtra
The official Twitter handle of Maharashtra Pradesh Congress Committee
- Atul Londhe @atullondhe

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615 Tweets



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K C Venugopal ✓
@kcvenugopalmp

General Secretary @INCIndia Incharge of organisation & Karnataka.Fomer Minister of State for Civil Aviation & Power in Govt of India. Ex MP,Alappuzha.

Alappuzha | Joined December 2016

138 Following | 57.2K Followers

Tweets | Tweets & replies | Media | Likes

K C Venugopal ✓ @kcvenugopalmp · 6h

It is deplorable that certain "anchors" believe it is their right to question Smt. Sonia Gandhi's virtues & values. She has spent 50+ years of her life in our nation. She has served with dignity & sincerity, she has sacrificed loved ones & epitomized what it means to be Indian.

200 | 869 | 3K

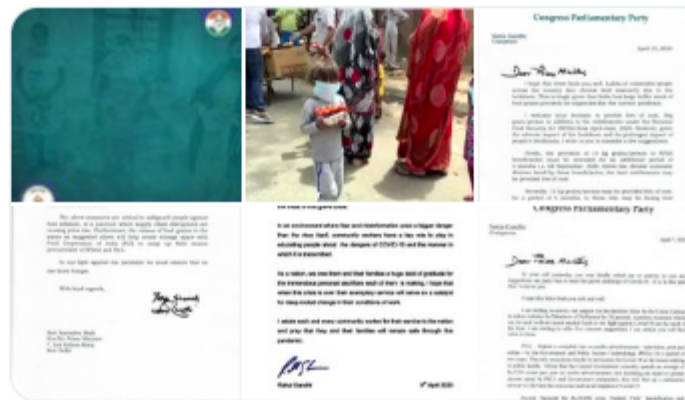
K C Venugopal Retweeted

Rahul Gandhi ✓ @RahulGandhi · 17h

#COVID19 has devastated our micro, small & medium businesses (MSME).

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FIR/COMPLAINTS AGAINST THE PETITIONER**List of FIRs**

1. FIR No. 238 of 2020, dated 22 April 2020, registered at Police Station Sadar, District Nagpur City, Maharashtra, under sections sections 153, 153-A, 153-B, 295-A, 298, 500, 504 (2), 506, 120-B and 117 of the Indian Penal Code 1860.
2. FIR No. 245 of 2020, dated 22 April 2020, registered at Police Station Supela, District Durg, Chhattisgarh, under sections 153-A, 295-A and 505 (2) of the Indian Penal Code 1860.
1. FIR No. 180 of 2020, dated 23 April 2020, registered at Police Station Bhilai Nagar, District Durg, Chhattisgarh, under sections 153-B, 188, 290 and 505 (1) of the Indian Penal Code 1860.
2. FIR No. 176 of 2020, dated 22 April 2020, registered at Police Station Civil Lines, District Raipur, Chhattisgarh, under sections 153-A, 295-A and 505 (2) of the Indian Penal Code 1860.

List of Complaints

1. Complaint dated 21 April 2020 by District Congress Committee - Antagarh, Kanker, Chhattisgarh
2. Complaint dated 22 April 2020 by Pritam Deshmukh (adv.), Durg District Congress Committee – to SHO city PS Durg, Chhattisgarh
3. Complaint dated 22 April 2020 by Suraj Singh Thakur, State Vice President, Indian Youth Congress – to Sr. Police Officer, Chirag Nagar, Ghatkopar East, Mumbai
4. Complaint dated 22 April 2020 – Pankaj Prajapati (party worker of INC and ex-spokesperson NSUI) through counsel Anshumaan Shrivastava – to Superintendent of Police, Crime Branch, Indore, Madhya Pradesh
5. Complaint dated 22 April 2020 – Balram Jakhad (adv.) – to PS Shyam Nagar – u/s 153, 188, 505, 120B in Jaipur
6. Complaint by Jaswant Gujar – to SHO Bajaj Nagar PS, Jaipur
7. Complaint dated 22 April 2020 by Fundurdihari, Ambikapur, District Sarguja, Chhattisgarh — Rajesh Dubey, Chhattisgarh State Congress Committee – to SHO Gandhi Nagar, Ambikapur – u/s 153, 153A, 153B, 504, 505
8. Complaint dated 22 April 2020 in Telangana by Anil IKumar Yadav, State President of Telangana Youth Congress – to SHO Hussaini Alam – u/s 117, 120B, 153, 153A, 295A, 298, 500, 504, 505 and 506. Also 66A of IT Act.
9. Complaint dated 23 April 2020 by Anuj Mishra before Kotwali, Urai, Tulsi Nagar
10. Complaint dated 22 April 2020 by Kumar Raja, VP, Yoth Congress, Jharkhand Congress Committee before Kotwali Police Station, Upper Bazar, Ranchi.

11. Complaint dated 22 April 2020 by Madhya Pradesh Youth Congress.

FORM-1A

पहिली खबर

FIRST INFORMATION REPORT

0175047

फौजदारी प्रक्रिया संहितेच्या कलम १५४ अन्वये (Under Section 154 Cr. P.C.)

1. राज्य महाराष्ट्र, जिल्हा मुंबई, पोलीस ठाणे न्याय, गोरगिरी, पहिली खबर क्र. 148, वर्ष 2020 दिनांक 23/04/2020
- State District Police Station FIR No. Year Date
2. (i) अधिनियम Act. भारतीय संविधान कलमे Sections 341, 504, 34
- (ii) अधिनियम Act. कलमे Sections
- (iii) इतर अधिनियम व कलमे Other Acts and Sections
3. (a) अपराधाची घटना : वारसुरुवार, तारीख पासून 23/04/2020 वेळ 8.0.20, तारीख पर्यंत 23/04/2020
- Occurrence of offence : Day Date from Time Date to Time
- वेळेचा अंश (प्रहर) (योग्य ठिकाणी अशी खुण करा) (Tick applicable portion).
- (1) 00.00 ते 03.00 (2) 03.00 ते 06.00 (3) 06.00 ते 09.00 (4) 09.00 ते 12.00 (5) 12.00 ते 15.00
- (6) 15.00 ते 18.00 (7) 18.00 ते 21.00 (8) 21.00 ते 24.00 (9) 06.00 ते 18.00 (5) 18.00 ते 06.00
- (b) पो. वा. ला माहिती मिळाल्याची तारीख 23/04/2020, वेळ 01.30
- Information received at P. S. Date Time
- (c) गुन्हा दाखल झालेला सर्वसाधारण स्टेशन डायरीचा नोंद क्र. 03, तारीख 23/04/2020 वेळ 08.12
- General Diary Reference : Entry No. Date Time
4. माहितीचा प्रकार Type of Information : लेखी / तोंडी Written / Oral तोंडी
5. गुन्हा घडल्याचे ठिकाण (a) पोलीस ठाण्यापासून अंतर व दिशा 1.2 km चौकी / बीट / दुसऱ्या नाव व क्र. 2 क. 3
- Place of Occurrence : (a) Direction and distance from P. S. Chouki/Beet / O.P. Name and No.
- (b) गुन्हा घडल्याचे ठिकाणचे नाव कडम मार्ग, कडम मार्ग, गल्ली, रस्त्याचे नाव
- Address of Occurrence Name No. if any Ward Name of road
- जवळचे ओळख शिन्ह / ठिकाण गाव पोस्ट तालुका जिल्हा राज्य
- Nearest identifiable place Village Post Taluka Dist. State
- (c) पोलीस ठाणेये हद्दीबाहेर असल्यास त्या पो.स्ट.चे नाव तालुका जिल्हा राज्य
- In case, outside the limit of this Police Station Taluka Dist. State
6. तक्रारदार / खबर देणाराचे नाव व पत्ता Complainant / Informant : Permanent Address.
- (a) नाव अर्णव गोसांमी (b) वडिलांचे / पतीचे नाव राजन गोसांमी
- Name Father's / Husband's Name
- (c) जन्म तारीख व वय 47 वर्ष (d) राष्ट्रीयत्व भारतीय फोन नं. 9810007501
- Date of Birth and Age Nationality Phone No.
- (e) पारपत्र क्रमांक दिव्याचा दिनांक दिव्याचे ठिकाण (f) व्यवसाय
- Passport No. Date of Issue Place of Issue Occupation
- (g) धर्म Religion जात Caste जनजात Sub-Caste
- (h) पत्ता 17-02, सहाय्य अत्याचार / कर्मि. के. रोड, मुंबई 400013
- Address : Ward House/Name No. Phone/Mo. No. PAN No. Card No.
- रस्त्याचे नाव जवळचे प्रसिद्ध ठिकाण गाव पोस्ट पो. स्ट.
- Road Nearest identifiable place Village Post P. Sin.
- तालुका जिल्हा राज्य सध्याचा पत्ता
- Taluka Dist. State Present Address
7. माहिती असलेल्या आरोपीचे संपूर्ण नाव व पत्ता (आवश्यक असल्यास स्वतंत्र कागद जोडावा.) (संशयिताचे वर्णन प्र. ख. रिपोर्टच्या फॉर्म 1-E वर घेऊन घेतल्या वेळीन तपासक अधिकारारुद्धा प्रथम खबरीला व सं. अनिर्घोषा यांच्या फाईलला जोडावे.)
- Details Name and Address of known Accused (Attach separate sheet, if necessary.) (If suspect particular of physical feature write on form 1-B of attach FIR 1-B to Case Diary.)

१२ पुनर्दि कुमार श्यामसुंदर मित्रा पु अरुण उन्निप टोपले COPY



घातक शिब्यीडी नसे अर्जव रंगत गोळ्यामी
 श्या - मुख्य लेपाइतु री.डि - टी, 1701/1702, शेजा अटबंसीध
 नि.के.रो, मुंबई येती आज दि. 23/04/2020 रोजी
 हंग्रजीमध्ये इंफिडिवीन कोठेक्या अर्जात। पदर गुन्हाची 95 म-
 टपकर अंकोवण्यात येताना वेदरुचा गुन्हा रजि क्र. 148/2020
 काळम 34, 504, 34 भा.ड.वि.सं अन्वये शिवाक इत्येत आला
 आहे.

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[Signature]
 Inspector of Police
 M. Joshi Marg Police St.
 MUMBAI

समझ
[Signature]

राहणे
 पेशकवे उपनिरीक्षक
 ना.म. जोशी मार्ग पो. ठणे,
 मुंबई

TO
SENIOR POLICE INSPECTOR,
NM JOSHI MARG POLICE STATION,
MUMBAI



Date – 23.04.2020

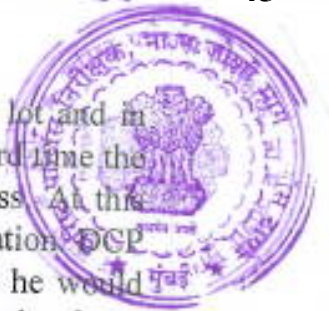
Statement of Shri Arnab Goswami, Age – 47 Ys., Occ.- Journalist, Res.
At – B-1701/1702, Raheja Atlantis, G.K. Road, Mumbai 400 013.

-----XXX-----

I am as above and reside at the above given address. On 23rd, April 2020, at 12:10 am this morning, my wife and Republic Editor Samyabrata Ray and I were driving back home from our Republic TV Headquarters at Bombay Dyeing Compound at Worli, Mumbai. At around 12:15am, when we reached Ganpatrao Kadam Marg, 2 men on a bike followed our car and tried to overtake it. These 2 men first tried to identify who was driving the car. They stretched out their arms, pointed their fingers at me and then blocked the path of my car with their 2 wheeler. The pillion rider hit the right side driver window several times and then, these attackers realised that the car window was up and they couldn't break through and immediately the pillion rider removed a liquid bottle from his pocket and threw liquid all over the car on the driver's side of the car where I was sitting. All through, both were shouting and abusing in Hindi while making violent gestures. I ducked my head towards the steering wheel and managed to get sight of the road ahead and pressed on the accelerator swerving to my left to avoid the 2 wheeler that was blocking the path. And while I did so, the pillion tried to bang on the door another time, threw more liquid, kicked on the door, and made abusive gestures while I swerved back to the middle of the road and was able to drive away. When I reached some distance (about 50 metres approximately) and saw in my rear view window that the attackers had been apprehended by the Mumbai Police protection team, comprising Mr Shivaji Hosmani and Mr Avinash Natekar along with my office guard Mahendra Kale. I swerved to my right towards my building and once I reached my building in 2/3 minutes, I waited in the parking area where I was informed by my office security personnel Mahindra Kale that the attackers had been apprehended. Mumbai police personnel arrived in another 5 minutes and Mr Shivaji Hosmani who is deputed for my personal protection informed me that the attackers had identified themselves as members of the Youth Congress who had been sent by higher ups to teach me a lesson. Within 10 minutes Police Inspector of NM Joshi Marg Mr Yogendra Pache, came in and in his presence, the entire account was repeated by Shivaji Hosmani, my Mumbai Police Security personnel about the attack on me by Youth Congress workers. After

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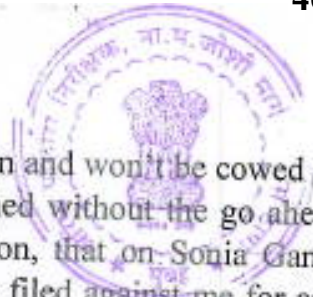
[Handwritten signature]



another 10-15 minutes, DCP Abhinash Kumar reached my parking lot and in order to put things on record, Mr Shivaji Hosmani recounted for a third time the whole incident and that the attackers were from the Youth Congress. At this point I offered to go and file an FIR at the NM Joshi Marg Police station. DCP Abhinash told me there was no need to do so immediately and that he would make sure the complaint was written and call me later to verify the facts. However when I did not get a call after one and a half hour later, I called my colleague Sanjay Pathak who was at the NM Joshi Marg police station who informed me that the DCP Abhinash said it's a matter of investigation whether they belong to Youth Congress or about their confession to the role in the attack. This was a clear u-turn and an attempt to change the facts and I confronted the DCP on the phone in 2 separate conversations of which I have due recording. I went to the NM Joshi Police station at 3:30am and was shocked when the DCP lied to my face saying that the Youth Congress attack on me was not known to him and that he will have to investigate the matter. I must place on record that I had to make multiple requests in the presence of my colleagues to get an FIR registered which amounts to pure harassment from a citizen who has been subjected to a assault by the ruling party in the state. Once again at the police station my Mumbai Police security personnel Shivaji told me (now for the 5th time) that the people apprehended had confessed that they were from the Youth Congress. At the Police Station, my colleague Sanjay Pathak informed me that he was informed by the Officers at the NM Joshi Marg Police Station that the attackers had been identified as Prateek Kumar Shyam Sundar Mishra and Arun Dilip Borade (videos and pictures are with us). I would also like to place on record that at 3am, within 2 hour 45 minutes of the attack, Congress leader Alka Lamba tweeted 'Yuva Congress Zindabad' using her verified social media handle. This celebration of the attack on me further reinforces my belief that that this attack on me and my wife Samyabrata Ray has been orchestrated by Sonia Gandhi and her close circle of Congress leaders at a time when we have raised serious questions about her accountability in several cases, including the attack on Hindu monks in Palghar on 16th April. I would like to place on record that there is considerable evidence that top Congress leaders have been carrying out an attempt to incite towards a violent attack on me personally and the Republic Network. Senior Congress leaders in fact have suggested the 'modus operandi' of the attack on me. So it cannot be a coincidence that a physical attack on me follows a series of threatening and violence laced comments by leaders loyal to Sonia Gandhi. I would also like to place on record that on my network, I have questioned and exposed the lies of Sonia Gandhi and her daughter Priyanka Vadra who had tried to spread fake news regarding segregation of COVID patients in Gujarat on April 15. I suspect and am concerned that there could be an attempt to conceal the fact that this was a clear attack orchestrated by Sonia Gandhi and the congress leadership on me and my wife, Samyabrata Ray - Editor Republic TV. We are both working

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hi /



journalists with more than 20 years in this profession and won't be cowed down by this cowardly attack which cannot have happened without the go ahead of Sonia Gandhi. In particular I would like to mention, that on Sonia Gandhi's instruction, a series of orchestrated FIRs have been filed against me for asking questions directly from Sonia Gandhi on her silence on the Palghar issue. A simple investigation will reveal that these FIRs followed social media abuse and threat by Congress leaders. As journalists, personally we will not be cowed down by such assaults and my team at Republic are determined to ask the question that make the Vadra Congress and Sonia uncomfortable, like we do, of all. I hope this matter will not be covered up and investigated and I'm ready to cooperate to follow up in any way. I would also like to place on record that if there is any untoward incident or harm to me or those associated with me, I will hold Sonia Gandhi and the Vadra family personally responsible given the history of their malice and violence towards me and my team.

Arnav K. Goswami - 23rd April 2020
ARNAB GOSWAMI

Sanya
SAMYABRATA RAY

Shivaji Hosmani
SHIVAJI HOSMANI

Avinash
23/4/20
AVINASH NATEKAR

Mahendra Kale
23-24-2-2-0
MAHENDRA KALE

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[Signature]
Inspector of Police
M. Joshi Marg Police Sta.
MUMBAI

IN THE SUPREME COURT OF INDIA
ORIGINAL WRIT JURISDICTION
[Order XXXVIII of SCR, 2013]
CRL.M.P.NO. of 2020
IN
WRIT PETITION (CRL) NO. OF 2020
(Under Article 32 of the Constitution of India)

IN THE MATTER OF:-

ARNAB RANJAN GOSWAMI

PETITIONER

VERSUS

UNION OF INDIA & ORS.

RESPONDENTS

APPLICATION FOR AD-INTERIM EX-PARTE STAY

TO,
THE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUDGES
OF THE HON'BLE SUPRME COURT OF INDIA.

THE HUMBLE APPLICATION OF THE ABOVE NAMED APPLICANT.

MOST RESPECTFULLY SHOWETH.

1. The petitioner herein has filed the present Writ Petition under Article 32 of the Constitution seeking stay of arrest of the petitioner in relation to several FIRs have been registered against him in different parts of the country in gross violation of his fundamental rights, including but not limited to the right of freedom of speech and expression as guaranteed

under Article 19 (1) (a) and right to life and personal liberty guaranteed under Article 21 of the Constitution of India, 1950. The FIRs which have been already registered against the Petitioner and the ones which are anticipated are in relation to the broadcasts aired on Republic TV on 16 April 2020 and R. Bharat on 21 April 2020, which were in connection with the comments given by a member of Congress in relation to India's COVID-19 testing measures and the unfortunate lynching of 3 individuals (including 2 priests) in Palghar on 16 April 2020.

2. That the contents of the Writ Petition be read as a part of the present application and the same are not reproduced for the sake of brevity.
3. ..The Complaints and the FIRs are false, vindictive, frivolous, malicious, precipitated with malice, untenable in law and have been filed with *mala-fide* intent by the Congress activists to coerce, harass and intimidate the Petitioner in order to muzzle the media and in particular the Petitioner, from carrying these news reports and conducting investigative journalism to bring the truth before the public. The

Complaints and FIRs are a part of well-coordinated and malicious campaign by the Congress and its members of instituting false and baseless complaints against the Petitioner before different police stations simultaneously in various parts of the country with request to register FIR and investigate the matter in relation to same set of facts.

4. That the complaints have been filed and FIRs registered with the sole intention to wreak vengeance against the Petitioner on account of personal animosity of the Chief of the Congress against the Petitioner for the following reasons:

- (i) The Petitioner's news channels have been at the forefront for seeking justice for the Palghar victims, including posing tough questions to the State Government in Maharashtra and its allies.
- (ii) The Petitioner has been instrumental in exposing fake news spread by the Indian National Congress in relation to the treatment of COVID-19 patients in Ahmedabad, number of COVID-19 tests conducted by India, availability of hydroxychloroquine in India etc.

Under these circumstances, the Petitioner begs to approach this Hon'ble Court for urgent relief of quashing of the FIRs,

pending this petition, no coercive action against the Petitioner in respect of the FIRs, including any FIRs which may be registered pursuant to the present Complaints or which may be filed in the future on the basis of the same broadcasts

5. The Petitioner has a *prima facie* case and the balance of convenience is in his favour and if urgent ad-interim reliefs are not granted, the Petitioner shall suffer irreparable harm and injury.
6. The Petitioner states that if urgent-ad interim reliefs as mentioned below are not granted, the writ petition will become infructuous.
7. The Petitioner is praying for the following reliefs, pending the hearing and final disposal of the present petition:

PRAYER

In view of the facts and circumstances stated hereinabove it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:

- (i). No coercive steps to be taken against the Petitioner, his family and his establishment in relation to the

Complaints/FIRs filed against the Petitioner as mentioned in **Annexure P2** or any other future complaints that are filed; .

- (i) Direct the Union of India to provide adequate safety and security to the Petitioner , his family and his establishment at various locations in the country.
- (ii) Ad-interim reliefs in terms of prayer clauses (a) and (b) above.

PRAGYA BAGHEL
ADVOCATE ON RECORD FOR THE APPLICANT

DATE:23.04.2020
PLACE: NEW DELHI.

URGENT

File No. _____

SECTION: X

IN THE SUPREME COURT OF INDIA
CIVIL/CRIMINAL APPELLATE/ORIGINAL JURISDICTION

~~CONTEMPT PETITION/REVIEW PETITION NO. _____ OF 20~~
~~CIVIL/CRIMINAL APPELLATE NO. _____ OF 2018~~
~~SPECIAL LEAVE PETITION (CIVIL/CRL) NO. _____ OF 201~~
 ✓ ~~WRIT PETITION (CIVIL/CRL) NO. _____ OF 2020~~

IN THE MATTER OF:-

Arnab Goswami _____ ...Petitioner(s)
 ...Appellant(s)
 ...Applicant(s)

- Versus -

Union of India & Ors _____ ...Respondents

INDEX OF DOCUMENTS

SL. NO.	PARTICULARS	COPIES	COURT FEES
1)	L/P	1+3	
2)	Synopsis - LOD	1+3	
3)	Writ petition with Affidavit	1+3	
4)	Annexure P1-P3	1+3	
5)	Application for Interim Relief	1+3	
6)	Vakalatnama		

DATED 23/04/2020

Filed by :-

PRAGYA(Ms. PRAGYA BAGHEL)

Advocate for the Petitioner(s)/Respondent

112, Lawyers Chamber,

Supreme Court Compound,

New Delhi - 110 001

Code No. : 1723

9850396999

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IN THE SUPREME COURT OF INDIA, NEW DELHI
CIVIL / CRIMINAL / ORIGINAL / APPELLATE JURISDICTION
~~S.P. W.P. / O.S. / P.C.A. / A.N.A.~~ ^{CRL} NO..... OF 2020

Arnab Goswami

Petitioner

Versus

Union of India & Ors.

Respondent(s)

VAKALATNAMA

I, Arnab Goswami Petitioner in the above W.P. / Appeal / Petition Reference do hereby appoint and return Ms. PRAGYA BAGHEL Advocate, Supreme Court of India, to act and appear for me/us in the above W.P./Appeal/Petition/Reference and on my/our behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same or any decree or Order passed therein, including proceedings, taxation and application for review, to file and obtain return of documents and to deposit and receive money on my/our behalf in the W.P./Appeal/ Reference and in application for review to represent me/us and to take all necessary steps on my/our behalf in the above matter. I/we agree to ratify all acts done by the aforesaid Advocate in pursuance of the authority.

Dated this the 23rd day of April 2020

[Signature]

PLAINTIFF(S)/APPELLANT(S) PETITIONER(S) DEFENDANT(S)
OPPOSITE PARTY INTERVENER NO..... RESPONDENT
& Identified,

Accepted
Certified.....

PRAGYA
(PRAGYA BAGHEL)
Advocate

MEMO OF APPEARANCE

To
The Registrar
Supreme Court of India
New Delhi

Sir,

Please enter my appearance on behalf of the ✓ Petitioner(s)/Appellant(s)/
Intervenor(s)/Respondent(s) No..... in the matter above mentioned dated this the
23 day of 04 2020

DATED: 23/04/2020

PRAGYA
Advocate for the Petitioner/Respondent
(Ms. PRAGYA BAGHEL)
112, Lawyer Chamber,
Supreme Court of India
9810396999