



Advocate
Bombay High Court

KHAN DESHMUKH & ASSOCIATES

Ali Kaashif Khan Deshmukh B.Sc. (IT) / L.L.B.

dc

Ref.No.: 26th AKK/01/59/473/2020

Date: 26th Oct, 2020

MOST URGENT

BY HAND DELIVERY

To:

✓ Mr. Hon'ble Ashutosh Kumbhakoni,
Advocate General of Maharashtra State,
Office: Room No.5 Extension Building,
PWD, 1st Floor, Bombay High Court,
Mumbai - 400032

[Handwritten Signature]
26/10/2020
022-(22623779)
Office of the Advocate General
High Court, Bombay

Re: Request for consent to initiate proceedings for criminal Contempt against Ms. Kangana Ranaut under Section 15 of the Contempt of Courts Act, 1971 Rule 5 (C) OF THE BOMBAY HIGH COURT APPELLATE SIDE RULES, 1960 To Regulate Proceedings for Contempt of Subordinate Court.

Sir,

1. I say that I am an Advocate / Lawyer by profession having age 26 years, practicing law in India, more specifically in the Courts of Mumbai. I say that I have always been raising my voice with legal actions in my personal capacity as much as well possible against anything wrong, illicit which is being committed in our country in order to maintain the brotherhood, unity, integrity and peace prevail amongst everyone and the values of Constitution of India be practiced throughout the country.

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2. I say that the the infamous Bollywood actress Ms. Kangana Ranaut is highly influential, powerful person with millions of followers, admirers as well as haters worldwide, need not mention her subsisting top notch Political contacts. Mrs. Rangoli Chandel is known to be elder sister, Manager and her official Spokesperson.
3. I say that both the sisters are together known for raising unnecessary controversies every now and then to be in limelight; Be it allegations against Actor Hrithik Roshan, Aditya Pancholi or even against the Big Media groups including their respectful journalists and also many other hardworking people from the Bollywood industry. Both the sisters have now stooped cheap low and have indulged in unlawful, illegal and criminal acts willingly by maliciously Spreading / Promoting Enmity between different groups on the grounds of religion and doing acts prejudicial to maintenance of harmony in the country by way of mischievously and spitefully posting frivolous, derogatory and defamatory posts with intent to outrage religious feelings of a class by insulting its religion or religious feelings / sentiments more specifically against Islam, Muslims.
4. I say that the Mrs. Rangoli Chandel on 15 / 04 / 2020 at around 4.37 pm had shamelessly made a highly immature, irresponsible, objectionable, malicious, defamatory statement / tweet on her twitter account id @Rangoli_A stating that "A Jamati died of Corona when police and doctors went to check their families they were attacked and killed, secular media, make these mullas + secular media stand in a line and shoot them dead... f****k the history they may call us nazis who cares, life is more imp than fake image." **Hereto annexed and marked as EXHIBIT A is the screenshot of the said malicious tweet made by the Mrs. Rangoli Chandel**
5. I say that immense outrage and hate were followed amongst various sects, followers, communities, celebrities, politicians after the said statement was delivered by Mrs.

Rangoli Chandel and thereafter the social media giant Twitter after having received unaccountable complaints and reports on the twitter handle for her illicit tweet immediately took strict action and suspended the official verified and highly influential twitter account within a day.

6. I further say that thereafter within few days, the Kangana Ranaut shamelessly came out in support of her Sister Mrs. Rangoli Chandel (*which she is always known for doing whenever the accused no.1 sparks controversy and vice-versa*) and stoop even further low, crossed all the legal limits and constitutional values and posted a short video on 18/04/2020 on various social media including Instagram account of Rangoli Chandel being 'rangoli_r_chandel' where she has not just supported the malicious tweet, acts of her sister but also went one step ahead and called a sect of Muslims (Jamati) as Terrorists! And also spoke malice about them.
7. In the said malicious video which the Kangana Ranaut posted against the Muslims in the support of the malicious hateful tweet statement of her sister Mrs. Rangoli Chandel; At first she is seen supporting her sisters hate tweet against Muslims calling for their killings, then she spoke ill about the Jamati Muslims, later she takes the several names of ministers unnecessarily to show her political influence and then very specifically said that "*Aap Aatankwadiyo ko Aatankiwadi nahi keh sakte?*" which is nothing but extreme hate, deceitful, derogatory statement against the Muslim Community even if the same was against the Jamati Muslims, the same cannot be justified by any means. **Hereto annexed and marked as EXHIBIT B is the screenshot of the said illicit video made by the Kangana Ranaut**
8. It is pertinent to note that one sister calls for genocide killings, violence and the other sister not just shamelessly support her for the same despite nationwide criticism and

suspension of her twitter account but also gives a label of TERRORIST to a sect of Muslims and also unnecessarily drags the respectful government servants in the shameful video act to give it a severe communal angle by misusing their stardom, fan base, fame, money, power, influence with an aim and intent to promote hatred, misbalance, fights in the country for their personal benefits and gains.

9. I say that both the sisters have now stooped even low by misusing their fan base, fame, power, influence through their social media accounts and creating hatred, enmity amongst religions in India through their above said tweet and video with an aim and intent to garner cheap publicity, personal gains and benefit by taking undue advantage of the grave situation prevailing in India due to Pandemic CoronaVirus which has already taken lives of many and still counting.
10. I say that the Central and the state governments are already taking necessary action in order to stop the spread of Pandemic Corona Virus; Whereas unscrupulous individuals like Rangoli Chandel are spreading Extreme hate and promoting genocide, killings, violence against the muslim community and even provoking to take law in hands by shooting them.
11. I say that after the illicit tweet made by the Mrs. Rangoli Chandel, I immediately filed a Police complaint before the Amboli Police Station on 16/04/2020 and requested the concerned police to forthwith register FIR against the Mrs. Rangoli Chandel; Thereafter when the Kangana Ranaut made the abovementioned illicit video, I further lodged a fresh complaint against the Kangana Ranaut as well dated 22/04/2020 to Register FIR; Hereto annexed and marked as EXIHIBIT ^C are the copies of the Police complaints filed against both sisters.



12. I say that I have already filed a private complaint in the Andheri Magistrate 66th Court against Kangana Ranaut i.e. Ms. Kangana Ranaut and her sister Mrs. Rangoli Chandel dated 27/07/2020 for indulging in unlawful, illegal and criminal acts willingly by maliciously Spreading / Promoting Enmity between different groups on the grounds of religion and doing acts prejudicial to maintenance of harmony in the country by way of mischievously and spitefully posting frivolous, derogatory and defamatory posts with intent to outrage religious feelings of a class by insulting its religion or religious feelings / sentiments more specifically against Islam, Muslims, the said case is now pending further adjudication.

13. I say that since the time of Actor Sushant Singh Rajputs alleged suicide / death, there has been tremendous chaos in the Bollywood industry from several accusations to the topic of nepotism and all being vehemently majorly done by the controversial actress Kangana Ranaut to satisfy her ego and propaganda against several actors, which she has been time and again doing since the allegations made out by her against Actor Hrithik Roshan, Aditya Pancholi, etc. but the same is being shamelessly continued by her now taking undue advantage of the sad demise of Actor Sushant Singh Rajput.

14. I say that the Kangana Ranaut has stooped cheap low and have started attacking the State Government of Maharashtra and its political party Shivsena by allegedly indirectly levelling them as accused behind the death of the Actor Sushant, thereby calling and concluding it a murder. Hereto annexed and marked as EXHIBIT D is the copy of the tweet made by the accused on her twitter account towards



derogatory remarks against Mumbai Police on Actor Sushant Singh Rajput's death which is also reproduced below as:

- (i) *"Liking derogatory tweets about people who are fighting against the murderers of Sushant, instead of condemning public teasing and bullying like this @CPMumbaiPolice is encouraging it, @MumbaiPolice has hit all time low ... SHAME !!"*
(dated: 01/09/2020)

15. I say that Ms. Kangana Ranaut has now crossed all her limits by even questioning the credibility, caliber, hard work, dedication of the Maharashtra and Mumbai Police by yet again wrongfully putting allegations on them leveling them as well behind the sad demise of the late actor stating that they are allegedly supporting the self claimed murder / death of the said late actor.

16. I say that Ms. Kangana Ranaut has now stepped above the law and have called the economic capital of India and its pride i.e. the MUMBAI city as 'PAKISTAN OCCUPIED KASHMIR' using her verified twitter handler @KanganaTeam on 03/08/2020; The accused using her power, fans, followers have been continuously tarnishing the image and reputation of the country and its part, thereby have now started calling and levelling it with our enemy country for her personal benefits and gains. The Kangana Ranaut has been shamelessly promoting enmity amongst our country people for her political gain and for the same she has not even spared the country and its part being the MUMBAI City from where she has grown and became a superstar , thus it won't be wrong to call her as a traitor who have been 'eating and spitting in the same plate.' She has even further called the Home minister of the Maharashtra state Mr. Anil Deshmukh as 'TALIBAN.' **Hereto annexed and marked as ANNEXURE 4 are the tweets / statements made by the Kangana Ranaut against**



the Mumbai city and sitting government of Maharashtra which are also reproduced below as:

(ii) *Sanjay Raut Shiv Sena leader has given me an open threat and asked me not to come back to Mumbai, after Aazadi graffitis in Mumbai streets and now open threats, why Mumbai is feeling like Pakistan occupied Kashmir?*

(dated: 03/09/2020)

(iii) *He is taking his own calls on my democratic rights, from POK to Taliban in one day 😊*

(dated: 04/09/2020)

(iv) *Kangana has no right to stay in Mumbai, we will make sure she can't enter Mumbai, we will beat her to death with stones and rods just how we lynched Palghar Sadhus. How you promoted yourself from POK to Taliban just in one day is commendable 🙏*

(dated: 04/09/2020)

(v) *Talibani 😊*

(dated: 04/09/2020)

17. It is pertinent to note that the said malicious tweets have defamed our country, its police, authorized government bodies, executive machineries all being established by the laws in India and have created serious ruckus in the country which has not just hurt my feelings but also have hurt the emotions and feelings of the MUMBAI POLICE, its retired officers, Mumbaikars, Maharashtrians and all the fellow Countrymen. The Kangana Ranaut has been continuously creating fear and panic in



the minds of the country people, more specifically Mumbaikars by indirectly and directly terming it as terrorist spot / hub.

18. It is imperative to also note that Kangana Ranaut has no respect for the law of the land, she has been time and again vehemently with malafide intentions and ulterior motives creating the hatred atmosphere in the country amongst the Hindus and the Muslims, thereby causing serious threat to the integrity of the country. Hereto annexed and marked as ANNEXURE-F are the tweets / statements made by the Kangana Ranaut causing disharmony amongst Hindus-Muslims in the country which are also reproduced below as:

- (vi) शर्म नहीं आती, अकबर और दवूद पे कितनी फ़िल्में बनाई है? कितनी बड़ी बड़ी फ़िल्में बनाई गयी हैं, ये मिला मराठाओं को अपने खून के बलिदान के बदले? इनमें से एक भी फ़िल्म शायद मेन्स्ट्रीम हिंदी नहीं है या फिर रिलीज़ नहीं हुई किसी ने तो कभी सुना भी नहीं इनके बारे में।
(dated: 04/09/2020)
- (vii) इनकी औकात नहीं है, इंडस्ट्री के सौ सालों में एक भी फ़िल्म मराठा प्राइड पे बनाई हो, मैंने इस्लाम डॉमिनेट इंडस्ट्री में अपनी जान और करीयर को दाओ पे लगाया, शिवाजी महाराज और रानी लक्ष्मीबाई पे फ़िल्म बनाई, आज महाराष्ट्र के इन ठेकेदारों से पूछो किया क्या है महाराष्ट्र के लिए?
(dated: 04/09/2020)

19. It is further also categorically stated that recently a private complaint under section 156(3) of CRPC was been filed against Kangana Ranaut before the Magistrate Court at Bandra, Mumbai for creating and atmosphere of hate in the country by defaming the Bollywood industry. After which the learned magistrate court ordered necessary action and Investigation vide order dated 16/10/2020. Hereto annexed and marked



as ANNEXURE ^G is the order of the said magistrate court at Bandra, Mumbai against the Kangana Ranaut.

20. It is already known from the above evident prima facie facts that Kangana Ranaut has no respect for the varied communities of India, law of the land, authorized government bodies further even shamelessly she has prominently even made fun of the JUDICIARY, as after the above said order of the learned magistrate court at Bandra, Mumbai she has promptly yet again tweeted on her twitter account with a malicious, defamatory tweet against the Judiciary by cheap act of calling and terming the judiciary as "PAPPU SENA" thereby even amounting to CRIMINAL CONTEMPT OF COURT. Hereto annexed and marked as EXHIBIT ^H is the copy of the defamatory tweet made against the judiciary for passing order.

(viii) *Who all are fasting on Navratris? Pictures clicked from today's celebrations as I am also fasting, meanwhile another FIR filed against me, Pappu sena in Maharashtra seems to be obsessing over me, don't miss me so much I will be there soon Red heart #Navratri*

(dated: 17/10/2020)

21. I say that the above said tweet of the respondent mocking, defaming the judiciary has made a heavy dent on the image, respect and sovereignty of the judiciary system of India amongst the heavy masses, the said illicit act of Kangana Ranaut has not just hurt my feelings being a lawyer and a court officer, but has also hurt the people who approaches courts/judiciary to seek justice.



22. I say that after the several illicit tweet made by the accused no.1, I immediately filed a Police complaint before the Andheri Police Station on 04/09/2020 and requested the concerned police to forthwith register FIR against the accused; the concerned police station even took my statement within few days but till date no action has been taken against the accused despite the offences being serious in nature. Hereto annexed and marked as ANNEXURE H is the copy of the Police complaint filed against Kangana Ranaut.
23. It is pertinent to note that every Indian Citizen has got the right to Freedom of Speech and not Freedom of 'Hate Speech'; we have all got limitations to use the right to freedom of speech and expression, yet several people including the present accused have been spreading hate, breaking the brotherhood, integrity of the country through their time and again provoking hate speeches disrupting peace in the country.5-In my opinion, the tweets abovementioned at point 4 thereof scandalizes not only judiciary system and its officers of law but also questions the administration of justice and interferes with the due course of judicial and administrative proceedings
24. Such tweets have defamed our country, its police, authorized government bodies, executive machineries all being established by the laws in India and have created serious ruckus in the country which has not just hurt my feelings but also have hurt the emotions and feelings of the MUMBAI POLICE, its retired officers, Mumbaikars, Maharashtrians and all the fellow Countrymen.
25. Also tweet of Ms. Kanagana Ranaut which is above mentioned shows mala fide intentions and ulterior motives creating the hatred atmosphere in the country amongst the Hindus and the Muslims, thereby causing serious threat to the integrity of the country.



26. The derogatory tweet / comment made on the judiciary by calling and terming it "PAPPU SENA" is derogatory and has internationally harmed the reputation of our courts and law system. The same has hurt my feelings being a court officer of law and has low down the judicial system in public.

27. Therefore it is in public interest that proceedings for contempt of court be initiated against Ms. Kanagana Ranaut. It is thus humbly requested and prayed that you may kindly give consent to the undersigned, to initiate proceedings for criminal contempt against Ms. Kangana Ranaut Section 15 of the Contempt of Courts Act, 1971 Rule 5 (C) ^{R/W} OF THE BOMBAY HIGH COURT APPELLATE SIDE RULES, 1960 To Regulate Proceedings for Contempt of Subordinate Court.

Thanking you, Regards.

Yours' sincerely

Ali Kaashif Khan Deshmukh

Advocate, Bombay High Court.

← Tweet

Exhibit- B/H/18

Q Search Twitter

Kangana Ranaut @KanganaTeam · Oct 17

Who all are fasting on Navratris? Pictures clicked from today's celebrations as I am also fasting, meanwhile another FIR filed against me, Pappu sena in Maharashtra seems to be obsessing over me, don't miss me so much I will be there soon #Navratri

Relevant people

Kangana Ranaut @KanganaTeam
Artist, Recipient of national awards winning grossing female filmmaker, Wannab

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Ruby Chauhan @RubyCha29930582 · Oct 17

Replying to @KanganaTeam
Beautiful pic kangana ji jai mata di

1 4

SumanSharma @sharrmasumann · Oct 17

Replying to @KanganaTeam
Stay strong @KanganaTeam , happy #Navratri , May Mata Rani bless you & keep you protected

3 66

Vijay @vijeyata292 · Oct 17

Replying to @KanganaTeam
I am fasting! Doing it for the first time. Feels amazing

37

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