

IN THE HON'BLE COURT OF THE CMM,  
NEW DELHI DISTRICT, NEW DELHI  
CRIMINAL COMPLAINT NO \_\_\_\_ OF 2021

IN THE MATTER OF:-

VISHNU GUPTA

...COMPLAINANT

VERSUS

ALI ABBAS ZAFAR & ORS.

...ACCUSED PERSONS

**I N D E X**

S.No.	Particulars	Pages	C/Fee
1.	Memo of Parties.	A1-A2	
2.	Criminal Complaint along With Affidavit .	1-8	Rs. 2/-
3.	List of witnesses	9	
4.	List of Documents Along with Documents.	10-11	
5.	Vakalatnama	12	Rs. 2/-

NEW DELHI

COMPLAINANT

THROUGH COUNSEL

DATED: 18.01.2021

  
SHASHI RANJAN KUMAR SINGH  
ADVOCATE  
ENRL NO. D/3320/2015  
CHAMBER NO. 144,  
DELHI HIGH COURT,  
NEW DELHI- 110003  
MOBILE: 9716775660

A1

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**MEMO OF PARTIES**

VISHNU GUPTA,  
S/O LATE SH. RAM NIWAS,  
R/O 108, AALI VILLAGE,  
SARITA VIHAR,  
NEW DELHI ...COMPLAINANT

VERSUS

1. ALI ABBAS ZAFAR,  
DIRECTOR
2. APARNA PUROHIT  
HEAD INDIA AMAZON ORIGINAL CONTENTS
3. HIMANSHU KRISHNA MEHRA  
PRODUCER,
4. GAURAV SOLANKI  
WRITER,
5. SAIF ALI KHAN  
ACTOR,
6. MOHAMMAD ZEESHAN AYYUB  
ACTOR,
7. MS. GAUHAR KHAN  
ACTOR

ALL AT:

A2

-2-

TANJAVI WEB SERIES  
AMAZON PRIME VIDEOS  
BRIGADE GATEWAY,  
8TH FLOOR, 26/1, DR. RAJKUMAR ROAD,  
MALLESHWARARAM,  
BANGALORE-560055

...ACCUSED PERSONS

NEW DELHI

*Vishal Singh*  
COMPLAINANT

THROUGH COUNSEL.

DATED: 12.01.2021

*Shashi*  
SHASHI RANJAN KUMAR SINGH  
ADVOCATE  
ENRL NO. D/3320/2015  
CHAMBER NO. 144,  
DELHI HIGH COURT,  
NEW DELHI- 110003  
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**AFFIDAVIT**

I, Vishnu Gupta, s/o Late Sh. Ram Niwas, R/o 108, Aali Village, Sarita Vihar, New Delhi do hereby solemnly affirm and declare as under: -

1. That I am the Complainant in the aforementioned Criminal Complaint and well conversant with the facts of the case and thus competent to swear this affidavit.

2. That I have read and understood the contents of the accompanying Criminal Complaint which has been drafted by my counsel on my instructions and the same are true and correct. The contents of the Complaint may kindly be read as part of this affidavit and the same are not being repeated herein for the sake of brevity.

VERIFICATION:

18 JAN 2021

DEPONENT

Verified at New Delhi on this \_\_\_\_ day of May 2021 that the contents of the above affidavit in para 1 and 2 are true and correct, no material is false and nothing material has been concealed there from.



Verily sworn before me  
over & explained to the deponent  
Admitted to be correct.

\_\_\_\_\_  
Sath Commissioner, New Delhi.

18 JAN 2021

DEPONENT

Vishnu Gupta

and entertain the Present Criminal Complaint. The Web series created by accused No. 1, 3 and 4 while telecasted by accused No. 2 was heard/seen/watched online by the Complainant at his office Hindu Mahasabha Bhawan, Mandir Marg, New Delhi which falls within the Jurisdiction of this Hon'ble Court.

**P R A Y E R**

It is therefore most respectfully prayed that the Hon'ble Court may be pleased to:-

(a) To take cognizance against the accused No. 1-7 for having committed offence U/S 153A/ 295A/505(1)(b)/505(2) IPC AND 66/67A IT ACT, 2000 read with section 34 IPC and to summon, try and punish the accused No. 1-7 for the commission of the above mentioned offences, in accordance with law.

(b) Any other/further order/relief which this Hon'ble court may deem fit and proper in the circumstances of the case may also be passed in favour of the complainant and against the accused No. 1-7.

NEW DELHI

  
COMPLAINANT

THROUGH COUNSEL



DATE: 18.01.2021

SHASHI RANJAN KUMAR SINGH  
ADVOCATE  
ENRI NO D/3320/2015  
CHAMBER NO 144,  
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the same to be false and untrue with the sole intention to outrage religious feelings of a class of citizens of India.

7. That the accused No. 1-7 has intentionally created the above said web series and released it online at an OTT Platform to promote enmity between different groups on ground of religion and outraged religious feelings of Hindus which is a criminal offence U/S 153A/295A/505(1)(b)/505(2)/34 IPC AND 66/67A IT ACT, 2000.

8. That the accused persons has outraged and insulted the religious feelings and religious beliefs of the Complainant due to the derogatory remarks made by the accused No. 6 in the Tandav Web series which was produced by accused No. 3 and directed by accused No. 1 while it was telecasted at Amazon Prime Videos with the consent and connivance of accused No. 2, while accused No. 5 to 7 are the actors in the said web series.

9. That the Accused No. 1 to 7 have while acting with common intention and in conspiracy while doing the above mentioned acts against the complainant committed penal offence U/S 153A/295A/505(1)(b)/505(2) IPC AND 66/67A IT ACT, 2000 read with Section 34 IPC which are punishable in law.

10. That the present Criminal Complaint is well within time and is within limitation as the said web series was released on 15.01.2021.

11. That this Hon'ble Court has the territorial jurisdiction to try

outraging religious feelings to insult religion and religious belief of Hindus along with the complainant that his insulting remarks against Hindu Gods will be heard and seen by citizens of India through TV and electronic media. That the provocative and outrageous remarks in the said Web Series are grossly offensive and deliberately intended to outrage the feeling of complainant and Hindus living in India and in other countries.

5. That the Tandav Web Series is inciting and provoking the communal disharmony and sentiments of Hindus. The accused No. 1-7 through their web series had targeted the Government of India and Government of Uttar Pradesh. The Tandav Web series had without any legal justification shown the Police is doing illegal encounters of Muslims under the Government of Uttar Pradesh with the mala-fide and criminal intention to defame the Government of Uttar Pradesh and create a hatred atmosphere between Muslims and Hindus.

6. That all the above stated facts conclusively prove that the accused No. 1-7 motivated by a criminal intent to promote enmity between different religion and to insult and outrage the religious feelings of Hindus made the above said remarks in the Tandav Web Series. That the accused No. 1-7 had made such remarks in the web series against the Hindu Gods and Hindu religion knowingly and having reason to believe

Actor 2: Kya Karu. Nayi Photo lagau??

Actor 1: Bhole Nath aap bahut bhole hain, kuch naya kijiye, in fact kuch naya tweet kijiye, kuch sensational, koi bhadakta hua shoal... jaise ki... haan campus ke saare vidyarthi desh drohi ho gaye. Azaadi Azaadi ka naare laga rahe hai.

Actor 2: Azaadi... What the Fu\*\* (laugh by audience) Idhar aa... jab me sone gaya tab tak to azadi cool chij hoti thi ab buri ho gayi kya??

Actor 1: Narayan...Narayan

Actor 2: Haan bhai kis chij se azaadi chahiye tum logo ko???

Ranji's followers are constantly increasing on social media and we should also make some new strategies to increase our fan base. On this Accused No. 6 Sh. Zeeshan Ayyub who is seen as Lord Shiva says, "Shall I come with a new display picture? On this the stage operator calls him innocent.

4. That the accused No. 1-7 had while making the above said remarks in the Tandav Web series deliberately and maliciously passed absolutely derogatory comments to outrage religious feelings of Hindus by mocking Hindu Gods without any justification with the sole intention to promote enmity between the different sections of the society and outrage religious feelings and religious beliefs of Hindus along with the religious feelings of the Complainant. The accused No. 1-7 were very well aware while making the said remarks with the intention of



Accused No. 4 Sh. Gaurav Solanki is the writer of the said web series. That Accused No. 5 Sh. Saif Ali Khan, Accused No. 6 Sh. Mohammad Zeeshan Ayyub and Accused No. 7 Ms. Gauhar Khan are the actors in Tandav Web Series.

3. That Amazon Prime Video had on 15.01.2021 released Tandav Web Series on its platform and has been streaming via Internet. That the Director, Producer, writer and actors of the web series i.e. accused No. 1-7 with the mala-fide and criminal intention to ridicule the Hindu Religion and to promote feelings of enmity/hatred between different sections of the society mocked the Hindu Gods and Hindu religion. That in the first episode of the above said Tandav Web Series Actor Accused No. 6 Sh. Mohammed Zeeshan Ayyub is seen disguised as Lord Shiva and while addressing the students of the university, he says that from whom do you want freedom (azadi). As soon as they come to the stage, a stage operator says, "Narayan Narayan". God, you need to do something to gain popularity and surpass him.

.....with a Vaishnav Tilak over forehead came to the former actor in that scene and says as follows:

Actor 1: Narayan... Narayan... Birole Nath, Prabhu, Ishwar, ye Ram ji ke followers din par din social media pe badhte hi jaa rahe hain (laugh by audience) mujhe lagta hai hamain bhi ab koi nayi social media strategy bana leni chahiye...

CRIMINAL COMPLAINT U/S 200 Cr.P.C. FOR  
SUMMONING, TRYING AND PUNISHING THE ACCUSED  
PERSONS FOR COMMISSION OF OFFENCES U/S 153A/  
295A/505(1)(b)/505(2)/34 IPC AND 66/67A IT ACT, 2000.

MOST RESPECTFULLY SHOWETH:

1. That the Complainant is residing along with his family members at the above mentioned address since the year 1993. The Complainant is the founder Member of a Registered trust formed in 2011 by the name of 'Hindu Sena'. The said trust Hindu Sena is having its head office at Hindu Mahasabha Bhawan, Mandir Marg, New Delhi and its registered office at 4/B, 19 Gautam Gali, New Vishwas Nagar, Delhi-32. That the Complainant is the President of the said Hindu Sena since its formation in 2011. That the said Hindu Sena is a globally known organization having its branches in seven of the Indian States with more than a million supporters all over the world.

2. That the Accused No. 1 Sh. Ali Abbas Zafar is the Director of the controversial web series Tandav released on 15.01.2021 at Amazon Prime Video, registered address at Amazon Prime Videos, Brigade Gateway, 8th Floor, 26/1, Dr. Rajkumar Road, Malleshwaram(w), Bangalore-560055 which is an over-the-top (OTT Platform) which streams media service offered directly to viewers via the Internet. That the Accused No. 2 Aparna Purohit is the Head of Amazon Original Contents, India, which is streaming the said Tandav Web Series. That the Accused No. 3 Sh. Himanshu Krishna Mehra is the producer and



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...ACCUSED PERSONS

PS: MANDIR MARG