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## **Synopsis**

1. This Public Interest Litigation petition filed under Article 32 of the Constitution of India relates to over 47 incidents of lynching, assaults and intimidation by vigilante groups making allegations of beef eating, cow protection and the like. The victims have invariably been Muslims, tribals and dalits. This petition contains the details of these cases. Petitioners have visited many of the families of the survivors as part of a civil society fact finding study of serious cases of mob lynchings, including the family of Junaid who was murdered on 22.6.17 while travelling on a train from Delhi to Ballabgarh while his two brothers were severely injured, three of the six accused arrested by the police in this matter got bail within a month without chargesheet being presented in the court. This shows the casual approach of the prosecution to deal with such heinous hate crimes.
  
2. At the outset petitioners state that there are 3 petitions pending before this Hon'ble Court namely Writ Petition (C) 754 of 2016, titled as Tehseen S Poonawalla vs. Union of India; Writ Petition (C) No. 764 of 2016 Mohanbhai Hamirbhai Bedva vs. Union of India & Ors. and Writ Petition (C) No. 768 of 2016 Martin Chhotubhai Macwan vs. Union of India, seeking certain reliefs in respect of the lynching and assaults and this Hon'ble Court issued notices against six states asking the government why these vigilante groups should not be banned. The three abovementioned Writ Petitions

have been tagged together and on 07.04.2017 this Hon'ble Court was pleased to pass the following order:

*"Issue notice, fixing a returnable date within three weeks...."*

3. Whereas the earlier petitions were filed with limited data and research this petition has been filed using 75 media reports and 13 Fact Finding Reports done by NGOs and social action groups (set out at serial 8 to 95 of the Index of Annexures) as well as references to 23 TV channel reports regarding hate-speech at Chart - A (paragraph 18); 31 instances of deaths caused and rape cases at Chart - B, (paragraph 25) and 16 instances of serious injuries caused as set out in Chart - C (paragraph 26). Chart B last column also sets out the status of the criminal proceedings. Out of 31 matters, in 2 matters (serial no. 2 and 3) FIR of the victims have not been registered. In 2 matters (S.No. 11, 14) the investigation/prosecution has been transferred to the CBI. In the remaining 27 matters the criminal proceedings are virtually at a standstill and it appears to the victim families that the police and the accused are colluding to ensure that the accused escape criminal prosecution.
4. The incidents that have happened are not isolated or unconnected, rather, are part of a well thought out plan by vested interests. The conspiracy invariably begins at the top where politically senior persons and senior religious leaders have instigated their followers to attack and kill Muslims, dalits and alleged beef eaters. In most

cases the allegation of beef eating was fabricated. In any case, no person has the right to take the law into his own hands and dispense extra-judicial justice to any other citizen of India.

5. A recently concluded fact finding of mob lynchings conducted by Aman Biradari Trust (Misaal project), covering 15 incidents of murder by Gau Rakshak Dals in Uttar Pradesh, Haryana and Jharkhand, in which 23 persons were killed and 2 young women raped, revealed some startling facts about the working of the criminal justice system, to the detriment of the victims. There are incidents where no FIR have been registered by the police even after the death of the victims assaulted by the cow vigilante groups or police themselves. There are incidents where non action by the police has resulted in a second incident of lynching by the same accused. There are number of incidents where cross FIR's have been registered against eyewitnesses to terrorise them, which clearly shows the biased functioning of the police. There are number of cases where the role of the prosecution dealing such cases is questionable as the accused gets easy bail even before the chargesheet is prepared.
6. The Dadri-like lynching incidents – like Akhlaq's, where innocent persons are attacked by mobs accusing them wrongly of slaughtering cows and consuming beef - may further increase as the Muslim festival of "Bakr Eid" is approaching in the first week of September 2017.



7. The hysteria that now surrounds the cow in India and that result in lynchings has been engineered one. A New York Times article, "Anatomy of lynching" dated 16.4.17, provides some useful insights. The relevant extracts are as under:

"The active ingredient in a lynching is silence. Like all forms of theater, a lynching depends on what is left unsaid; it creates a mood, an atmosphere. The silence that settles in after the euphoric act of violence, which all have witnessed, tells a minority group that it has been forsaken. It is this element of a suggestive and creeping threat, in which the state apparatus and a silent majority are complicit, that has the power to demoralize a community as much as the physical acts of violence. The hysteria that now surrounds the cow in India has been engineered..."

8. The incidents of lynching are a part of organized hate campaigns against the Muslims, as per Al-Jazeera article by Professor Apoorvanand of the Delhi University, dated: 6.07.17 titled "What is behind India's epidemic of mob lynching?". The relevant extracts of the article is as under:

"..But these cases would not have been so frequent if it weren't for the atmosphere of hate and suspicion against Muslims, created through a sustained political campaign. Engaging in "meat politics" and calling for cow protection

has been a favourite tool for many Hindu nationalist politicians... These groups encourage various hateful beliefs about Muslims: that they are "cow eaters", a threat to Hindu women, and members of terror sleeper cells. They spread ludicrous fears that the Muslim population is growing and will outnumber Hindus in India. This atmosphere of sustained hatred against Muslims makes attacks on them seem spontaneous and the product of mob anger. But few question why the mob is angry in the first place..."

9. The relevant extracts of the "South Asia State of Minorities Report 2016" dated: 03 November 2016 are as under:

"...Sometimes specific laws facilitate violence against minorities, especially by non-state vigilante groups acting in connivance with a biased police and law enforcement. All states, barring a few have laws banning cow slaughter and its transportation (U.P. The Prevention of cow slaughter Act 1955 and Bihar the Preservation and improvement of Animals Act 1955) with varying attribution of crime and associated penalties...But the presence of the laws provides a ready tool for a communalised police force to target mostly the poor Muslim transport workers, resulting in arrests and incarceration of many for long periods of time without even the prospect of bail. Incidents of hate speeches have been common..."

10. A BBC report titled "A Night Patrol's with India's Cow Protection Vigilantes" dated 29.10.15 is as under :

"In the neighbouring Alwar town, the local BJP lawmaker Gyan Dev Ahuja makes no bones about his support for the vigilantes."I give them money, I give them support, I hold classes on the virtues of cow," he tells me (the author). A sample of his lessons: California is entirely electrified by cow dung fuel or biogas, cow milk contains traces of gold; and foreign experts say killing cows in India will "lead to volcanoes, earthquakes and drought."Still," he sighs, "the cow is not being given enough importance in India. That is why I support the vigilantes. They have a mission. It's about saving India's soul. It's about Hindutva (Hinduness)."

11. The relevant extracts of a Human Rights Watch article on the subject "India: 'Cow Protection' Spurs Vigilante Violence" are as under:

"The mild admonitions from BJP leaders when Muslims and Dalits are lynched over cows sends a message that the BJP supports this violence. Even as BJP leaders failed to condemn attacks on Muslims and other minorities, they have announced new policies for cow welfare and made strong statements about the need to protect cows. Their policies and statements have

facilitated abuses by cow protection groups in BJP-ruled states of Rajasthan, Haryana, Uttar Pradesh, Jharkhand, Gujarat, Madhya Pradesh, and Chhattisgarh”.

12. The relevant extracts of the Joint submission of India , UN country team (UNCT) for the Universal Periodic Review of India 3<sup>rd</sup> Cycle 27<sup>th</sup> Session, April-May 2017 :

“Part 5- Religious Minorities Rights

Point no. 35 - Incidents of religious minorities being targeted during riots, such as in Muzzafarnagar, particularly during times preceding elections need to be addressed. Following incidents of violence arising out of allegations of cow slaughter, the Prime Minister in a statement, condemned these activities for trying to “poison social harmony.”

13. The article from the Caravan Journal titled as “In the Name of the Mother” dated: 1.09.2016 reveals the devastating style of functioning of these vigilante groups. The report is enclosed as Annexure – P . The relevant extracts from the article are as under:

“ On 5 August, Times Now broadcasted a sting operation, showing interviews with five top leaders of the Vishva Hindu Parishad and the Bajrang Dal—both prominent factions of the Sangh Parivar. The footage showed the leaders admitting, and at times gloating over the fact that their organisations fostered such

vigilantism among their ranks, and that the Gau Raksha Dal had the full support of the BJP government and the RSS. According to the report, apart from introducing tougher laws against cow slaughter in 2011, the Modi government increased the annual grant to the Gauseva and Gauchar Vikas Board—a state-run organisation whose main objectives are “to coordinate with groups involved in preventing slaughter of cow and progeny” and to ensure “effective implementation of cow protection laws”—from Rs 1.5 crore to Rs 150 crore. Moreover, between 2011 and 2014, the State Government disbursed Rs. 75 lakh in cash rewards to 1,394 gau rakshaks. It went on to say that “to provide further motivation to the cow protection volunteers, Rs.3.75 lakh was given to the ‘top performers,’ which included recipients of the biennial Best Cow Protector award. A couple of days later, Surinder added me to a WhatsApp group called “Gau Bhagat. On 2 June, I skimmed through 500-odd messages on it. They mostly contained details about rallies, orders, patrols and achievements, apart from sundry jokes and nationalistic propaganda, with dubious arguments and statistics. There were also images, videos and songs hailing the cow mother. Most of the messages ended with “Jai Gau Mata Ki.” A few weeks thence, Surinder changed the

name of the group to "Gau ma da ladlaa," or beloved son of the cow mother. Recently, on 9 August, reacting to the Prime minister's comments against gau rakshaks, one of the members posted a poem in Hindi:

"Ek arab ki umeedon ne tumko vahaan bithaaya  
tha Saare desh ke gau bhakton ne, milkar jor  
lagaya tha Abhi samay hai, maafi maang lo,  
varna desh ki gaddi se ab tumhein utaara  
jaayega, Patna toh tum haar chuke, ab UP haara  
jaayega"

14. The recent lynching of Junaid shocked the world where he was brutally killed. The relevant extracts of the fact finding report by 'Khudai Khidmatgaar' along with 'Human Rights Law Network' into the Ballabgarh lynching incident dated 22.6.17 are as under:

"Someone from the crowd snatched Hashim`s skull cap, threw it on the floor and crushed it with his feet. After this they caught Hashim`s beard. They tried to stop them, they started beating them all. They started shouting, "Katalla hain! Maaro Maaro! Daadi rakhte hain! Gaddar hain, they are Muslims, anti-nationals and beef eaters". When asked about the role of passengers in the train, she said the other people in that coach also joined the attackers. Since Junaid was fasting, his brother Hashim asked for water from the crowd to break the fast but

nobody offered him water. When Hashim asked a lady for a dupatta to cover his wounds, she refused.”

15. Dadri’s Akhlaq lynching was one of the most infamous cases of this lynching series. The relevant extracts of the fact finding report by ‘Human Rights Law Network’ into the Dadri lynching incident dated 28.9.15 are as under:

“The calf was reportedly missing since 16<sup>th</sup> September (12 days before the incident) if this would be a serious issue and in the backdrop of upcoming Bakrid on 25th September, it would have become a serious communal issue much before the day incident took place which didn’t happen. Hence the “missing calf and beef theory” is being portrayed to give communal colour to the incident and try to save culprits of lynching Akhlaq.”

16. The relevant extracts of the fact finding report by ‘Human Rights Law Network’ into the Ayub lynching death case , Ahmedabad by Gau Rakshak mob dated 13.09.2016 are as under:

“When Ayub and Sameer Shaikh were in an Innova car towards Ahmedabad with two calves, the gau rakshak mob chased them all of a sudden. It was reported that they pulled them out of the car and thrashed them. The group rammed into their car near Honest T-junction near Karnavati club in Ahmedabad, pulled them out of the car and beat them up.”

17. In continuance of their ugly vigilantism and selective attacks on minorities and dalits. The cow vigilante groups targeted the dalits involved in skinning a cow carcass for leather industry. They mercilessly beat and paraded the four victims, and flogged them publicly all the way to the police station. The relevant extracts of the fact finding report by Human Rights Law Network into the Una Dalit lynching incident dated 11.07.2016 are as under:

“I told them that the cow was dead and that we were merely removing its skin. But they started abusing us and attacked us with iron pipes, sticks and a knife with which we were removing the skin of the carcass, Vashram said in his complaint. The purported video of the victims was circulated on social media...”

18. The chart of the incidents of instigation for the commission of hate crimes within the meaning of Section 153A & B, 295A, 298 and 505 IPC and other similar sections has been set out in Chart - A which is as under:

**Chart – A**

<b>Date &amp; Place</b>	<b>Newspaper TV channel Website</b>	<b>Speaker</b>	<b>Words uttered</b>
June 8,2017 Roorkee	First post	Sadhvi Prachi, VHP leader	“Hindustan ko congress mukt to kardiya lekin aaj ki jo zarurat hai vo mai samajhti hu ki Hindustan ko muslim mukt bharat karne ke liye humein kaam karna chahiye



<p>August 2015</p>	<p>Aaj Tak</p>	<p>Sadhvi Prachi, VHP leader</p>	<p>or hum kaam kar rahe hain” (Now that we have achieved the mission of making a India free of Congress, it is time to make India Muslim-free).</p>
<p>October 2015</p>	<p>Aaj Tak</p>	<p>Sadhvi Prachi, VHP leader</p>	<p>“Ye Hindustan ka bahot bada durbhagya hai. Hindustan ki sansad me ek do aatanki baithe hain. Isse bada durbhagya mai ni samajhti Hindustan ka aur koi ho sakta hai. Jo ek court ke faisle ki avmanna mere vichaar se kar rahe hain. Kyuki court ne ye saabit kardiya hai ki ye ek atankwadi hai to usko jo atankwadi ko samarthan kar rahe hain to vo sab mai samajhti hu atankwadi hain. Or desh ka durbhagya hai ki aise atankwaadi sadan me baithe hain. It is a big misfortune that in the Indian Parliament, we have one-two terrorists sitting there. {August 2015 Aaj tak}</p>
<p>June,</p>	<p>Aaj Tak</p>	<p>Sadhvi Prachi, VHP leader Prachi, VHP leader Prachi, VHP leader</p>	<p>On Dadri Lynching, “jo gau maas khate hain unke sath yahi hashr hona chahiye. Humari maa ke tukde tukde karke khane se jinhe Jannat milti hai or vo kisi hindu ne uski hatya ni ki, akhlaq ke</p>



October 16, 2015	Hindustan Times	Manohar Lal Khatta, Haryana CM	"Muslim rahein, magar is desh mein beef khaana chhodna hi hoga unko. Yahan ki manyata hai gau" (Muslims can continue to live in this country but they will have to give up eating beef)"
20 April 2017	Times Of India	Uma Bharti	Ayodhya ke liye, Ganga ke liye, Tiranga ke liye, mai koi bhi saza bhugatne ke liye tayyar hu. I can go to any extent for Ram, Cow, Ganga and Tiranga.
February 2017	India Today	Sakshi Maharaj	"..Vishwa me jitne bhi Islamic desh hain wahan kisi bhi prakaar se koi Qabristan hota hi nahi hai. Wahan to jalaya jata hai.." regarding the issue of allotment of land for graveyard and sanction of fund for maintain its outer walls in election rally.
September 14, 2017	The Indian Express	Sakshi Maharaj	"..Madarson mein atankvad ki shiksha di jati hai. Students ko jihadi banate hain," (students are educated in terrorism in the madrasas. They are made jihadis).."
May 15, 2015	The Hindu	Sakshi Maharaj	"Maharaj allegedly used abusive language against police officials and threatened to "take revenge" if BJP came to power in the state after the Assembly polls

October 18, 2015	India TV	Sakshi Maharaj	On Dadri Lynching "Seedhi si baat hai humari maa ka koi apmaan karega hum sehen nahi karenge, mar jaenge maar denge. Bharat mata ke upar koi ungli uthata hai koi atanki to humare log sahi bhi hote hain maarte bhi hai"
January 7, 2015 Meerut	Zee News	Sakshi Maharaj	"..Hum nivedan karna chahte hain ki kam se kam 4 bachche paida karo. Hindu women should atleast produce four children..." (To counter Muslim population growth rate)
September 2014 Noida	The Times Of India	Yogi Adityanath	"..Agar ek hindu ka khoon bahega to ek hindu ke khoon ke badle ane wale samay me hum prashasan se FIR darj nahi karwaenge lekin kam se kam 10 logo ki aise hi hatya karwange.."
24 February 2015	Zee News/ Aaj Tak	Mohan Bhagwat, RSS Chief	Mother Teresa ki seva achchi rahi hogi, par iske peeche ek uddeshya rehta tha, jiski seva ki ja rahi hai vo isai ban jae. Koi kisi ko isai banae na banae uska prashn nahi hai. Parantu seva ki aad me vo kiya jata hai to us seva ka amulyan ho jata hai. (There was a motive behind the service Mother Teresa provided to the poor — to

			<p>convert them to Christianity).</p> <p>"..Agar England me rehne wale angrez hain, Germany me rehne wale german, America me rehne wale American hain to Hindustan me rehne wale sahi log hindu kyu nahi ho sakte. Hindutva hi humare rashtra ki pehchan hai..."</p>
<p>July 2017 Goa</p>	<p>Indian express</p>	<p>Sadhvi Saraswati, President Sanathan Dharma Prachar Seva Samiti, Madhya Pradesh</p>	<p>"Humare sar se paani upar jaa chuka hai, isiliye humein Hindu Rashtra chahiye" (By 2023, Hindu Janajagruti aims at making India a Hindu rashtra (Hindu nation))</p> <p>"..Gau humari mata hai, agar kasaiyo ka gala nahi kata to ye baaz nahi aenge. To humein Kendra Sarkar se nivedan karna padega ki gau hatya karne walo ko phaansi ki saza mile or inka gala kata jae. Agar bharat Hindu rashtra banega sabhi samasyaein apne aap hi mit jaengi."</p> <p>"Beef eating is like eating mother's meat, and therefore, such people should be hanged in a public square and when their bodies are hung publicly, no one will dare to eat beef".</p>

<p>April 2017 Jaipur</p>	<p>Indian Express</p>	<p>Gyan Dev Ahuja, BJP MLA</p>	<p>“Kanoon humko haath mein nahi lena chahiye. Lekin uski maut hui. Uske liye humko koi afsosh nahi hai. Aur afsosh karoonga bhi nahi kyunki jo gau taskar hain, gau hatyare hain, aise paapiyon ka yehi harsh hota raha hai, hota rahega...” (We should not take law into our hands. But we have no regret over his death [Pehlu Khan] because those who are cow-smugglers are cow-killers; sinners like them have met this fate earlier and will continue to do so).</p>
<p>October 2015, Dadri</p>	<p>The Hindu</p>	<p>Sangeet Som, BJP MLA</p>	<p>Without naming Muzaffar - Nagar riots, Mr. Som warned, “kanoon kanoon ki tarah kaam kare. Warna, ham pahle bhi muhtod jawab de chuke hai aur aage bhi denge [the law should act as law. Otherwise, we have given a strong reply in the past and would do that in future as well]”. While keeping with his Hindutva image in western UP, Mr. Som refused to condemn the mob lynching of Akhlaq. When The Hindu asked Mr. Som if he would go condemn the murder, he smiled and said,” Let the</p>

			enquiry report come as to what happened that day". He also met the families of accused arrested for inciting and killing Akhlaq. He assured the families, the crowd that he would try to get them out on bail.
January 2017	Indian Express	Hukum Singh, BJP MLA	"..If I emerge as the winner (in UP polls), curfew will be imposed in Kairana, Deoband and Moradabad..." he said.
December 2012	The times of India	Akbaruddin Owaisi, President of the AIMIM	"..Agar bharat se police ko hata liya jae to 15 minute k andar yahan k 25 crore musalman 100 crore hinduo ka khatam kar sakte hain.."
March 2016	Extract from NCM report on Latehar lynching (Mazloom Ansari and Imteyaz Khan).	Gopal Maniji Maharaj	"The residents mentioned a Baba Gopal Maniji Maharaj from Dehradun who started coming to the region in 2012 and initiated this movement which has since become more widespread... the locals report that at meetings of these committees, there is incitement to hatred and an attempt to target Muslims in the name of cow protection."
March, 2016	Extract from HRLN fact finding report on latehar	Chintamani	"The villagers also informed that a Hindu Baba named Chintamani from Utrkhand came and moved in the entire area and propagated the ideology to hang and kill

	lynching.		the Muslims to protect cows. This incident is the outcome of this Prawachan only. This entire program was organized and funded by the local BJP Member of Parliament.”
July, 2017	Youtube	Sadhvi Deva Thakur	She threatened the Muslims to avenge the killings of Hindus at Amarnath Yatra 2017 by Killing Muslims during Haj Pilgrimage
August, 2017	Youtube	Sadhvi Deva Thakur	A video full of abuses against the Muslims where she talks to repeat Gujarat like incidents to teach a lesson to Muslims. The words she uttered were so vulgar and hateful that it cannot be mention here.

The audio – video of the above mentioned hate speeches are annexed in form of a CD at Annexure – P1.

19. For the abovementioned hate crimes petitioner seeks the registration of an FIR, just and proper investigation and prosecution by a CBI. Petitioner states that no meaningful action has been taken against the person abovementioned.

20. Section 153A of IPC read as under:



“Promoting enmity between different groups on grounds of religion, race, place of birth, residence, language, etc., and doing acts prejudicial to maintenance of harmony”.

21. Section 153B of IPC read as under:

“Imputations, assertions prejudicial to national-integration.”

22. Section 295 A of IPC read as under:

“Deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs”

23. Section 298 of IPC read as under:

“Uttering, words, etc., with deliberate intent to wound the religious feelings of any person.

24. Section 505 (1) c read as under:

“1(c) with intent to incite, or which is likely to incite, any class or community of persons to commit any offence against any other class or community, shall be punished with imprisonment which may extend to 6 [three years], or with fine, or with both.

(2) Statements creating or promoting enmity, hatred or ill-will between classes.

25. The incidents of lynchings that resulted in deaths and rape has been set out in a summary Chart – B prepared by the petitioner which is as under:

### Chart – B

<b>S.No</b>	<b>Date</b>	<b>Place and Particulars/ Incident</b>	<b>Action taken/ case status</b>
1.	August 23, 2013	<b>Kairana, Shamli, U.P:</b> Salim, of Malakpura, Kairana, Shamli, UP, was attacked by Gau Rakshaks in Panipat, Haryana, when returning from Babel, Panipat, after purchasing cattle for animal husbandry purposes. Died in hospital 3 days later.	An FIR under the cow slaughter act was filed against Salim, victim. Later, on 26.08. 2013, FIR No. 314 was registered at P.S. Panipat Sadar u/s 148, 149, 323 on the basis of Salim's statement. These included, even after Salim's death, FIR registered u/s 304 IPC and not 302 IPC. A few accused persons were arrested and were granted bail. Victim's family claim Panipat police was putting pressure on them to compromise the case. No progress in case.
2.		<b>Nizamuddin, New Delhi:</b> Arif Quresihi, of Singar, Punhana, Nuh. Tortured in police custody, Nizamuddin Police station, New Delhi. Succumbed to injuries sustained in the beatings.	FIR was filed in PS Hazrat Nizamuddin u/s 279, 338 and 339 IPC, r/w section 25, 54, 27 and 59 of Arms Act and Section 3 and 12 of Prevention of Cruelty to Animals Act, 1960.  Victim's family unable to have a FIR in respect of Arif's death filed, due to fear.

3.	August 06, 2013	<p><b>Surajkund, Faridabad:</b> Farid and Sher Singh (both of Pema Kheda, Punhana, Nuh, Haryana), murdered, and Taufiq, injured for life, in Gau Raksha Dal vigilante attack in Ankheer, near Surajkund, Faridabad.</p>	<p>an FIR dated 7.08.2013, was filed against 8 unknown people in PS Surajkund Dist Faridabad u/s 179, 279, 304A, 429, 307, 34 IPC, Section 25, 54, 59 Arms Act, Section 3, 4. The Punjab Cow Slaughter Act, 1955. NO FIR pertaining to the mob lynching of Sher Singh, Farid and Taufiq was filed by the police. Parents of the deceased have filed a case in HC to investigate the cause of their sons' deaths. No progress with the case, and too scared to approach the police to file FIR in lynching of their sons.</p>
4.	June 6, 2014	<p><b>Pune, Maharashtra:</b> Mohsin Sadiq Shaikh, a 24-year-old from Solapur district, who worked as an IT manager with a private firm in Pune was beaten to death by the mob of radical Hindu outfit on the basis of his Muslim identity after he was returning home from offering namaz.</p>	<p>Out of 21 accused 15 have been granted bail in the matter so far. Charge-sheet filed but charges not framed till date. In a shocking order passed by the Bombay High Court which granted bail to three of 21 arrested on January 12, 2017 which says: "the fault of the deceased was only that he belonged to another religion. I consider</p>

			<p>this factor in favor of the applicants/ accused. Moreover, the applicants/ accused do not have any criminal record and it appears that in the name of the religion, they were provoked and have committed the murder”.</p>
5.	March 16, 2015	<p><b>Nagalpatti, Khizrabad, Yamunanagar, Haryana:</b> Tahsin earn his living by selling and purchasing cattle. After doing some purchasing from different village while returning home Tahsin along with his friends Ayub and kallu were attacked by a group of 8-10 people, kallu and Ayub managed to escape but Tehsin was tied with a rope used for pulling an OX and was assaulted by the mob. The dead body of Tahsin was recovered from the Western Yamuna Canal five days after the incident.</p>	<p>Police inaction led to a second incident of mob lynching by the same accused. At second stance FIR bearing No. 39/2015 PS Khizarabad, District Yamuna Nagar was registered. Four accused arrested. Vide judgment dated 25.01.2016, the Sessions Judge, Yamuna Nagar District, convicted Subhash Chand u/s 304 Part II and the other 3 accused were acquitted. Accused Subhash was sentenced to undergo imprisonment of 5 years. No appeal was filed in the High Court against the judgment of the Sessions Court by the State of Haryana. The family of the deceased could not file an appeal due to lack of</p>

			money and resources to follow the case further.
6.	May 30 2015	<b>Nagaur dist. Rajasthan:</b> Abdul Ghaffar Qureshi, 60, who ran a meat shop in Birloka village in Nagaur district, was beaten brutally by a mob with sticks and iron rods on May 30, 2015. He died the following day. The mob also vandalized his home and shop.	Two years after the incident, the police have filed murder charges against three accused in the attack, while six are yet to be arrested.
7.	August 2, 2015	<b>Dadri, Uttar Pradesh:</b> A mob beat to death three men accused of stealing cattle – Anaf, Arif, and Nazim – in the Kaimrala village of Dadri town on August 2, 2015. The mob also set their truck on fire after they found two buffaloes in it.	FIR u/s 302 registered by the the Police, 6 days after the murder, only after public pressure. Police filed an FIR against the boys on the next day of the incident stating that they were caught by the people in the village stealing cows and were assaulted by the mob. No arrests made - no investigation. Victims unable to travel to Dadri PS and courts, due to fear of being attacked by the accused.
8.	September 28, 2015	<b>Dadri, Uttar Pradesh:</b> Mohammed Akhlaq, a 52 year old resident of the Bisada village in UP's Dadri	19 people were named in the FIR and were arrested, one of the accused Ravin Sisodia died in jail due to

		<p>was lynched to death and his son, 22-year-old Danish seriously injured by a mob for suspected storing of cow meat in the freezer.</p>	<p>chikanguniya fever who was draped with the tricolor on his body to project him as a martyr. With the bail of key accused Vishal Rana who was charged u/s 302,307, 147, 148, 149, 323, 427, 458, 504 and 506 of IPC and section 7 of criminal Law Amendment Act, only three are in jail. State govt. has not challenged any bail order so far.</p> <p>FIR has also been filed against the victim and his kin, for allegedly possessing beef.</p>
9.	October 9, 2015	<p><b>Udhampur, Jammu and Kashmir:</b> A right-wing mob in Udhampur district of Jammu and Kashmir allegedly threw gasoline bombs at a truck driven by Zahid Bhat, an 18-year-old trucker, because they suspected him – wrongly – of transporting beef. He died of his injuries at a hospital 10 days later. Two others travelling with him were also injured.</p>	<p>FIR lodged some accused arrested but released on bail.</p>
10.	October	<p><b>Himachal Pradesh:</b> A violent Hindu mob at</p>	<p>FIR u/s 302 and cross case u/s 429 going on in Distt</p>

	14, 2015	Sarahan, a village near Simla, allegedly beat to death Noman Zahid , 22, a resident of Uttar Pradesh, on October 14, 2015, over suspicions that he was smuggling cows. The mob also beat up four other occupants of the truck.	Sirmaur HP.  Charge-sheet filed in the first case. Second case at the stage of evidence. Reported pressure and threats from accused, on victim families, and witnesses, to effect a compromise.
11.	March 3, 2016	<b>Kurukshetra, Haryana:</b> Mustahsin Abbas, was killed by Gau-Rakshaks in Kurukshetra district, while transporting cattle he and a few friends had purchased from Shahabad.	Body obtained only after moving HC, 6 days after the incident. Initial FIR filed against victims and co-travelers. (FIR No.124 dated 06.03.2016 under Section 11 of the Prevention of Cruelty to Animals Act read with Section 307 IPC and Section 25 of the Arms Act was registered at Police Station Shahbad).  Vide Order dated 18.03.2016, the High Court transferred the case to CBI to investigate the matter, including investigating the role of Police and magistracy.  After HC intervention, FIR filed u/s 302 etc., of Mustahsin's murder. CBI investigation still ongoing.

12.	March 18, 2016	<p><b>Latehar, Jharkhand:</b> Two men were hanged from a tree after being mercilessly beaten up by unruly cattle-protection vigilantes in Latehar district, Jharkhand. A Muslim cattle trader, Mohammed Mazlum Ansari, 35, and a 12-year-old boy, Mohd. Imtiyaz Khan, were found hanging from a tree in Jharkhand for allegedly smuggling cows. But later, it was revealed that they were cattle herders.</p>	<p>The case being G.R. Case No 176/2016 is currently on Evidence Stage. 8 Accused persons were arrested and have all been granted bail by High Court. Since, family members and neighbors claim, they have been threatened by the accused.</p>
13.	July 6, 2016	<p><b>Sodhana, Gujarat:</b> A Dalit man Rama Singrahiya, 42, was allegedly beaten to death using clubs and axes in Gujarat's Sodhana village located 30 km away from Porbandar.</p>	
14.	August 2016	<p><b>Mewat, Haryana:</b> A Muslim woman and her 14-year-old minor cousin were allegedly gang-raped after being accused of eating beef. Two other relatives (Ibraheem and Rasheedan) were murdered. The woman</p>	<p>FIR No. 247 in PS Tauru, Mewat District was registered against 4-5 unknown person u/s 376-D, 459, 460 IPC, Section 6 of POCSO Act, 2012 Section 25/54 of Arms Act, 1959. After registration of the FIR, no action was</p>



		<p>later denied eating beef.</p> <p>Four men were arrested and charged with rape and murder.</p>	<p>taken by the police. Due to public pressure case was handed over to CBI but CBI is also not investigating the matter seriously, as till December 2016, CBI officials had not even visited the place of occurrence even once.</p> <p>The victim's family had filed a writ petition in the High Court of Punjab and Haryana, Sarjina vs. State of Haryana &amp;Ors. CRM-M No. 41814 of 2016, seeking that the investigation may be done under the supervision of the Hon'ble High Court. The case is pending for the CBI Status Report.</p>
15.	August 2016	<p><b>Udapi, Karnataka:</b> The cow vigilantes killed a local BJP worker in Karnataka over the alleged cow smuggling. Praveen Poojary (29), was beaten to death with steel rods allegedly by activists of the Hindu Jagrana Vedike (HJV) for transporting cattle at Karjike in Udupi district.</p>	

16.	September 2016	<p><b>S.G.Highway, Gujarat:</b> Mohammed Ayub was beaten to death by cow vigilantes on the suspicion that he was transporting cows for slaughter on S G Highway, Gujarat. Ayub died in hospital days later.</p>	<p>The police had reregistered 2 FIRs, the first against Sameer Shaikh and Ayub under the Cow protection act and other against the cow vigilante u/s 307 IPC.</p>
17.	October 9, 2016	<p><b>Jamtara, Jharkhand:</b> Minhaj Ansari, picked up by police, on instigation by Gau-Rakshak Dal for posting objectionable content on Facebook. Tortured in police custody, with police supported by Gau-Raksha Dal member Sonu Singh. Died in hospital.</p>	<p>Mother of the deceased filed an FIR No. 154/16 u/s 354, 341, 342, 323, 325, 307, 504, 506 and 34 IPC in PS Narayanpur, Distt Jamtara against SI Harish Pathak. Though police earlier denied the allegations of excesses, they've now admitted that there were prima facie lapses on the part of the officer-in-charge of P.S. Narayanpura Sub-Inspector Harish Pathak who has been suspended and an FIR of murder has been registered against him.</p>
18.	January 22 -23, 2017	<p><b>North-24 Parganas, Nadia - Bengal:</b> A 22-year-old youth was beaten to death by a mob while on a vagabond in the North 24 Parganas, Bengal.</p>	

19.	March 9, 2017	<b>Tripura:</b> A Muslim security guard was lynched to death in Tripura who was allegedly part of a group of 12 who had come with intentions of robbery in a village. The incident occurred at Siddhinagar village under PuranRajbari Police Station in southern Tripura along the Bangladesh border.	
20.	April 1, 2017	<b>Alwar, Rajasthan:</b> A Muslim man named Pehlu Khan, 55, was lynched by a mob of hundreds of cow vigilantes in Alwar in Rajasthan. He was beaten badly and died two days later in a hospital. He was lynched for allegedly transporting cows. It was later found that he was taking the cows for his dairy farm.	FIR No. 255/2017 registered u/s 323, 143, 341, 147 and 379 IPC all bailable sections against the six accused where as two separate FIRs filed against the victims under non bailable sections. It was only after the death of Pehlu Khan that 302 were incorporated in the FIR even after grave injuries to the other victims section 307 is not incorporated. Bail application of the accused rejected by session judge. Charge-sheet not filed.
21.	April 30, 2017	<b>Nagaon, Assam:</b> A mob lynched two men in Nagaon district of Central Assam on suspicion of them being cow thieves.	10 accused are arrested in the matter and booked under section of 341/302/34 IPC. Charge-

		Abu Hanifa, 23, and Riazuddin Ali, 24, were chased down by a village mob and assaulted brutally, both of them died of their injuries.	sheet not filed.
22.	May 2, 2017	<b>Bulandshahr, Uttar Pradesh:</b> A mob of right wing activists lynched an old man, Ghulam Mohammad, after a boy from the village eloped with a woman from a different community. Ghulam Mohd. was beaten to death.	Despite complaint filed by family members, with the police regarding life threat from Hindu Yuva Vahani, no action was taken, next day; the same group attacked and killed Ghulam Mohd. 9 accused were arrested now some of them are on bail.
23.	May 12-13, 2017	<b>Jadugora / Asanboni, Jharkhand:</b> Two persons were lynched by the violent mob over suspicion of being a child-lifter at Asanboni village in Jadugorathana area, about 40km from Jamshedpur, making it the second killing and fourth assault within 24 hours.	
24.	May 18, 2017	<b>Jamshedpur, Jharkhand</b> : Seven persons, including two brothers returning from work linked to the Swachh Bharat campaign, were beaten to death by mobs in two attacks over	FIRs have been registered at the Rajnagar P.S Case No. 29, 30, 31& 32 of 2017. The case is at the stage of investigation and the police have arrested some accused persons

		<p>last 24 hours in tribal-dominated areas near Jamshedpur following rumours of gangs involved in kidnapping children being active in the region. 4 of those lynched – Shaikh Naeem, Shaikh Haleem, Shaikh Siraj and Shaikh Sajju, were cattle traders that were killed by a mob on allegations of transporting cattle for slaughter.</p>	<p>from them some are granted bail.</p>
25.	June 23, 2017	<p><b>Ballabgarh, Haryana:</b> A minor Muslim boy namely Junaid was allegedly stabbed to death and four others two of them his real brothers were injured on board a Mathura-bound train, between Okhla and Asoti in Haryana, a distance of about 60 km when an argument over a seat turned into religious slurs and triggered a mob attack on family members returning home from Eid shopping.</p>	<p>Six accused arrested by the police but three of them were granted easy bail within a month even before the charge-sheet is being prepared. On 30.7.2017 one of the accused Chander Prakash was granted bail by the Court of ASJ, Faridabad. On. 3.8.17 two other accused Pradeep and Gaurav were bailed out.</p> <p>Injured are being medicated at home due to fear of being attacked or killed as being an eyewitnesses.</p>
26.	June 23, 2017	<p><b>North Dinapur, West Bengal:</b> Three people</p>	<p>An FIR was lodged by Sunaina Bibi, wife of</p>

		were lynched in West Bengal's North Dinajpur district after they were allegedly caught stealing cows from a house. Those killed have been identified as Mohd. Nasir, Nasirul Haque and Mohd. Samiruddin.	deceased Md Samiruddin on 23.06.2017 in Chopra P.S u/s 304/34 of IPC. The police have so far arrested 3 accused in the case and the investigation is ongoing. Currently all the accused persons have been released on bail and the Chargesheet has not yet been filed.
27.	June 23, 2017	<b>Srinagar, Kashmir:</b> Mohammad Ayub Pandit the serving Superintendent of Police in J & K Police was lynched to death by the extremist Muslim mob outside the Jama Masjid of Srinagar suspecting as the informer of the police while he was on duty.	Police registered a case vide FIR No 51/2017 u/s 302 IPC in Police Station Nowhatta, Srinagar, J&K.  Two accused Muhammad Danish and Mudasir Ahmad were arrested in connection with the killing of Pandit.
28.	June 26, 2017	<b>Pratapgarh, Jaipur, Rajasthan:</b> Rajasthan officials beat man to death after he objects to their photographing women defecating in open. Zaffar Hussein, a CPI (ML) member and activist, was allegedly beaten to death by civic officials after he objected to them taking photographs of women defecating in the open.	

29.	June 29, 2017	<p><b>Ramgarh, Deori, Giridih district, Jharkhand:</b> Mohd. Alliumuddin, a meat trader was badly thrashed by around 30 people after they surrounded his van in the Bazaar Tand area of Ramgarh police station. They dragged him out of the vehicle and beat him to death. The attackers also set Ansari's vehicle ablaze.</p>	<p>FIR No. 198/17 was registered at PS Ramgarh dated 29.06.2017 by the deceased's wife u/s 147, 149, 302 and 34 IPC against the 12 accused persons. A cross case regarding cruelty to animals and possession of beef has been filed in PS Ramgarh, FIR No. 199/17 against the deceased and Kalimuddin. The family of the deceased stated that initially police was very active and arrested 5 named and 7 unnamed accused persons on the basis of video footage. But after the protest &amp; rally by the Ex BJP MLA, Ramgarh, Shankar Chowdhury, the police have stopped arresting the accused. Only an amount of Rs. 2 Lakhs has been given as compensation.</p>
30.	July 3, 2017	<p><b>Assam:</b> Three people were brutally beaten by the cow vigilant groups in Assam on the suspicion of carrying beef.</p>	
31.	July 3, 2017	<p><b>Murshidabad, West Bengal:</b> Otera Bibi a</p>	<p>An FIR bearing FIR No. 441/17 dated 27.06.2017</p>

		mentally retarded woman 42-yr-old, was brutally beaten, tied to a tractor and lynched to death after the woman was accused of being a child-kidnapper. The villagers ripped her clothes, shaved her head and went on lynching her 'mercilessly' says a witness in the Mithipur- Panagarh village.	was registered in PS Raghunath Ganj u/s 341, 323, 325, 308 and 34 IPC against unknown persons by Sanad Sk (father of the deceased). The police have so far arrested 12 accused persons, while many others are still absconding.
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26. Similarly in respect of the incidents of lynchings where people were seriously injured has been set out in a summary Chart – C which is as under:

**Chart – C**

<b>S.No</b>	<b>Date</b>	<b>Place and Particulars/Incident</b>	<b>Action taken/proceeding of the case</b>
1.	January 13, 2016	<b>Harda, Madhya Pradesh:</b> A Muslim couple on train beaten in MP over beef suspicion. The couple was among passengers assaulted by at least seven members of the Gau-Raksha Samiti at Khirkiya railway station, in Harda district of Madhya Pradesh, when they objected to their luggage being searched on suspicion that they were carrying beef.	
2.	June 10, 2016	<b>Mewat, Haryana:</b> Muslim beef transporters beaten, forced to eat cow dung by GauRakshak Dal in	



		Mewat, Haryana. GauRakshak Dal, a self-proclaimed cow protection group in Haryana had beaten two Muslim men namely Rizwan and Mukhtiar who were allegedly transporting beef and forced them to eat cow dung.	
3.	July 2016	<b>Una, Gujarat:</b> Four Dalits were stripped and brutally beaten in public by local Shiv Sena members in a village of Gir-Somnath district for skinning a dead cow. The victims, who are engaged in skinning in Mota Samadhiyala village near Una town, had brought dead cows.	FIR No: 127/2016 filed at Una police station, accusing 46 people. Out of which the Victims named 6 persons – out of which three has been arrested. Charge sheet filed. Criminal case No. 94/2016 pending.  12 accused are bailed out by session's and High courts.
4.	May 30, 2017	<b>Chennai, Tamil Nadu:</b> A PhD scholar in IIT, Madras, was at one of the vegetarian messes on campus, when he was attacked—allegedly for eating beef.	
5.	April 15, 2017	<b>Muzaffarpur, Bihar:</b> A motorcyclist was lynched and his throat slit after he accidentally hit	

		a goat. Navin Kumar, 45, a farmer of Patti Bandhu Rao village under Lalganj police station of Vaishali, was thrashed mercilessly before his throat was slit by a mob for injuring the goat. His friend and pillion rider Sikandra Sahni, was severely injured in Muzaffarpur.	
6.	April 21, 2017	<b>Reasi, Jammu &amp; Kashmir:</b> A Muslim nomad family was brutally attacked by vigilantes. A family of five, including a 9-year old girl, were attacked and injured; police arrested 11 so-called cow vigilantes in connection with the attack.	
7.	April 22, 2017	<b>Kalkaji, Delhi:</b> Group of rights activist's purportedly animal rights activists allegedly belonging to People for Animals, which is led by a BJP official, beat up three men in a truck for transporting buffaloes.	
8.	April 29, 2017	<b>Bihar:</b> A man was blinded for honking at cow wandering in the middle of the highway.	
9.	May 21, 2017	<b>Jaipur, Rajasthan:</b> Jaipur, Rajasthan: A 19-year-old Qasim, who works at the Hayat Rabbani hotel, was assaulted by a group of cow protection vigilantes on the accusation of throwing a plastic bag of discarded meat in the dumping ground. The vigilantes	FIR No. 46/2017 filed with bailable offence u/s 143, 451 and 323 of IPC whereas strong FIR No. 45/2017 filed against the

		claimed that bag contained beef.	victim u/s 295 IPC. No arrest made in the case in FIR against the accused whereas the victim was arrested in an FIR made by the accused.
10.	June 11, 2017,	<b>Rajasthan:</b> Despite having a no-objection certificate (NOC) and official permission from police and other authorities, officials of the animal husbandry department of Tamil Nadu's govt. were attacked by cow vigilantes in Rajasthan for transporting cows in five trucks.	
11.	June 27, 2017	<b>Ranchi, Jharkhand:</b> Man thrashed, house set on fire by mob in Jharkhand over dead cow. Usman Ansari a 60-year-old man was beaten unconscious by a mob after the carcass of a cow was found outside his house in Giridih district of Jharkhand.	
12.	July 8, 2017	<b>Baba Hardas Nagar, Delhi:</b> Six people thrashed by mob of cow vigilant group for allegedly carrying cattle's (buffalos). A person named Ali Jaan was badly injured is currently under treatment.	
13.	July 11,	<b>Sarai Kala Khan, New Delhi:</b> A	

	2017	mob attacked Muslim man named Iftikhar Alam 22 year old who works with Delhi Metro as mechanical helper was tied to a pole and brutally beaten by the mob while on duty the mob accused him of eating beef and buffollo.	
14.	July 13, 2017	<b>Mainpuri (U.P.):</b> A Muslim family 10 women including, children, elders and a handicapped teenager were brutally assaulted and molested in a train and robbed by a gang with iron rod and sticks between Mota and Nibkarori railway stations some 30b Km away from Farrukhabad junction.	
15.	August 02, 2017	<b>Bokaro, Jharkhand:</b> An angry mob stripped, brutally thrashed a man in Jharkhand's Bokaro district after he was found with a girl belonging to other religion. The man identified as Mohammed Shakir sustained serious injuries after he was assaulted by a mob on Tuesday (August 1) in Bokaro's Kathara area.	
16.	August 03, 2017	<b>Shahpur, District Bhojpur, Bihar:</b> Three men were badly beaten by the group of alleged Bajrang Dal activist on the suspicion of transporting cow meat in a truck on National Highway No. 84, which indicates	

		that lynching and mob violence entered Bihar as soon as BJP came to power in the state.	
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27. The above incidents shows the pathetic condition of the state where these vigilantes groups can unleash upon people in the name of cow protection where the state is quite reluctant in taking action against them.

### **List of Dated & Events**

<b>Date</b>	<b>Particulars</b>
August 06, 2013	Farid and Sher Singh (both of Pema Kheda, Punhana, Nuh, Haryana), murdered, and Taufiq, injured for life, in Gau Raksha Dal vigilante attack in Ankheer, near Surajkund, Faridabad.
August 23, 2013	Salim, of Malakpura, Kairana, Shamli, UP, was attacked by Gau Rakshaks in Panipat, Haryana, when returning from Babel, Panipat, after purchasing cattle for animal husbandry purposes. Died in hospital 3 days later.
Undated, 2013	Arif Quresihi, of Singar, Punhana, Nuh. Tortured in police custody, Nizamuddin Police station, New Delhi. Succumbed to injuries sustained in the beatings.
June 6, 2014	Mohsin Sadiq Shaikh, a 24-year-old from Solapur district, who worked as an IT manager with a private firm in Pune was beaten to death by the mob of radical Hindu outfit after he was returning home" from offering namaz.
May 30 2015	Abdul Ghaffar Qureshi, 60, who ran a meat shop in Birloka village in Nagaur district, was beaten brutally by a mob with sticks and iron rods on May 30, 2015.

	<p>He died the following day. The mob also vandalized his home and shop. Two years after the incident, the police have filed murder charges against three accused in the attack, while six are yet to be arrested.</p>
<p>August 2, 2015</p>	<p>A mob beat to death three men suspected of being cattle thieves – Anaf, Arif, and Nazim – in the Kaimrala village of Dadri town on August 2, 2015. The mob also set their truck on fire after they found two buffaloes in it.</p>
<p>September 28, 2015</p>	<p>Mohammed Akhlaq, a 52 year old resident of the Bisada village in UP’s Dadri was lynched to death and his son, 22-year-old Danish seriously injured by a mob for suspected storing of cow meat in the freezer.</p>
<p>October 9, 2015</p>	<p>A right-wing mob in Udhampur district of Jammu and Kashmir allegedly threw gasoline bombs at a truck driven by Zahid Bhat, an 18-year-old trucker, because they suspected him – wrongly – of transporting beef. He died of his injuries at a hospital 10 days later. Two others traveling with him were also injured.</p>
<p>October 14, 2015</p>	<p>A violent Hindu mob at Sarahan, a village near Simla, allegedly beat to death Noman, 22, a resident of Uttar Pradesh, on October 14, 2015, over suspicions that he was smuggling cows. The mob also beat up four other occupants of the truck.</p>
<p>January 2016</p>	<p>Maharashtra amended 2015 beef ban law—banning people from possessing the meat of cows, bulls and bullocks, slaughtered within or outside the state. However, serving beef in restaurants across the state was allowed. Two cow-terrorism attacks were</p>

	reported from the state, India's richest by gross domestic product, in 2017.
2016	Andhra Pradesh, Assam, Himachal Pradesh, Kerala, Odisha, Tamil Nadu and Bihar reported number of attacks on the name of cows.
January 13, 2016	A Muslim couple on train beaten in M.P. over beef suspicion. The couple was among passengers assaulted by at least seven members of the Gau Raksha Samiti at Khirkiya railway station, in Harda district of Madhya Pradesh, when they objected to their luggage being searched on suspicion that they were carrying beef.
March 18, 2016	Two men were hanged from a tree after being mercilessly beaten up by an unruly cattle-protection vigilantes in Latehar district, Jharkhand. A Muslim cattle trader, Mohammed Mazlum Ansari, 35, and a 12-year-old boy, Mohammed Imtiyaz Khan, were found <b>hanging</b> from a tree in Jharkhand for allegedly smuggling cows. But later, it was revealed that they were cattle herders.
June 10, 2016	Muslim beef transporters beaten, forced to eat cow dung by Gau Rakshak Dal in Mewat, Haryana. Gau Rakshak Dal, a self-proclaimed cow protection group in Haryana had beaten two Muslim men namely Rizwan and Mukhtiar who were allegedly transporting beef and forced them to eat cow dung.
June 2016	Muslim women were thrashed and abused by Hindu Dal activists in Madhya Pradesh's Mandsaur district over rumours that they were carrying beef. The women were slapped and kicked by a group of men and women at the crowded railway station even as onlookers, including cops, watched.

July 6, 2016	A Dalit man Rama Singrahiya, 42, was allegedly beaten to death using clubs and axes in Gujarat's Sodhana village located 30 km away from Porbandar.
July 2016	Four Dalits were stripped and brutally beaten in public by local Shiv Sena members in a village of Gir-Somnath district for skinning a dead cow. The victims, who are engaged in skinning in Mota Samadhiyala village near Una town, had brought dead cows.
August 2016	A Muslim woman and her 14-year-old minor cousin were allegedly gang-raped after being accused of eating beef. Two other relatives (Ibrahim and Rasheedan) were murdered. The woman later denied eating beef. Four men were arrested and charged with rape and murder.
August 2016	The cow vigilantes killed a local BJP worker in Karnataka over the alleged cow smuggling. Praveen Poojary (29), was beaten to death with steel rods allegedly by activists of the Hindu Jagrana Vedike (HJV) for transporting cattle at Karjike in Udupi district.
September 2016	Mohammed Ayub was beaten to death by cow vigilantes on the suspicion that he was transporting cows for slaughter on S G Highway, Gujarat. Ayub died in hospital days later.
October 9, 2016	Jamtara, Jharkhand: Minhaj Ansari, picked up by police, on instigation by Gau Rakshak Dal for posting objectionable content on Facebook. Tortured in police custody, with police supported by Gau Raksha Dal members. Died in hospital.
January 22 -23,	A 22-year-old youth was beaten to death by a mob



2017	while on a vagabond in the North 24 Parganas, Bengal.
March 9, 2017	A Muslim security guard was lynched to death in Tripura who was allegedly part of a group of 12 who had come with intentions of robbery in a village. The incident occurred at Siddhinagar village under PuranRajbari Police Station in southern Tripura along the Bangladesh border.
April 1, 2017	A Muslim man named Pehlu Khan, 55, was lynched by a mob of hundreds of cow vigilantes in Alwar in Rajasthan. He was beaten badly and died two days later in a hospital. He was lynched for allegedly transporting cows. It was later found that he was taking the cows for his dairy farm.
April 15, 2017	A motorcyclist was lynched and his throat slit after he accidentally hit a goat. Navin Kumar, 45, a farmer of Patti Bandhu Rao village under Lalganj police station of Vaishali, was thrashed mercilessly before his throat was slit by a mob for injuring the goat. His friend and pillion rider Sikandra Sahni, was severely injured in Muzaffarpur.
April 21, 2017	A Muslim nomad family was brutally attacked by vigilantes. A family of five, including a 9-year old girl, were attacked and injured; police arrested 11 so-called cow vigilantes in connection with the attack.
April 22, 2017	Group of rights activistspurportedly animal rights activists allegedly belonging to People for Animals, which is led by a BJP official, beat up three men in a truck for transporting buffaloes.
April 29, 2017	A man was blinded for honking at cow wandering in the middle of the highway.
April 30, 2017	A mob lynched two men in Nagaon district of Central

	Assam on suspicion of them being cow thieves. Abu Hanifa, 23, and Riazuddin Ali, 24, were chased down by a village mob and assaulted brutally, both of them died of their injuries.
May 2, 2017	A mob of right wing activists lynched an old man Ghulam Mohammad, after a boy in the village eloped with a woman from a different community. The man was beaten to death.
May 12-13, 2017	Two persons were lynched by the violent mob over suspicion of being a child-lifter at Asanboni village in Jadugorathana area, about 40km from Jamshedpur, making it the second killing and fourth assault within 24 hours.
May 18, 2017	Seven persons, including two brothers returning from work linked to the Swachh Bharat campaign, were beaten to death by mobs in two attacks over the last 24 hours in tribal-dominated areas near Jamshedpur following rumours of gangs involved in kidnapping children being active in the region. 4 of those lynched – Shaikh Naeem, Shaikh Haleem, Shaikh Siraj and Shaikh Sajju, were cattle traders that were killed by a mob on allegations of transporting cattle for slaughter.
May 21, 2017	A 19-year-old Qasim, who works at the Hayat Rabbani hotel, was assaulted by a group of cow protection vigilantes on the accusation of throwing a plastic bag of discarded meat in the dumping ground in Jaipur, Rajasthan. The vigilantes claimed that bag contained beef.
May 30, 2017	A PhD scholar in Indian Institute of Technology, Madras, was at one of the vegetarian messes on campus, when he was attacked allegedly beef eating.

June 11, 2017,	Despite having a no-objection certificate (NOC) and official permission from police and other authorities, officials of the animal husbandry department of Tamil Nadu's govt. were attacked by cow vigilantes in Rajasthan for transporting cows in five trucks.
June 22, 2017	West Bengal: Three Muslim men were lynched in Islampur, Uttar Dinajpur for allegedly trying to steal cows.
June 23, 2017	Ballabgarh, Haryana: A minor Muslim boy namely Junaid was allegedly stabbed to death and four others two of them his real brothers were injured on board a Mathura-bound train, between Okhla and Asoti in Haryana, a distance of about 60 km when an argument over a seat turned into religious slurs and triggered a mob attack on family members returning home from Eid shopping.
June 23, 2017	Three people were lynched in West Bengal's North Dinajpur district after they were allegedly caught stealing cows from a house. Those killed have been identified as Mohammad Nasir (30), NasirulHaque (32) & Mohammad Samiruddin (33).
June 23, 2017	Mohammad Ayub Pandit the serving Superintendent of Police in J & K Police was lynched to death by the extremist Muslim mob outside the Jama Masjid of Srinagar suspecting as the informer of the police while he was on duty.
June 26, 2017	Rajasthan officials beat man to death after he objects to their photographing women defecating in open at Pratapgarh, Jaipur, Rajasthan. Zaffar Hussein, a CPI (ML) member and activist, was allegedly beaten to death by civic officials after he objected to them taking photographs of women

	defecating in the open.
27 <sup>th</sup> June 2017	Man thrashed, house set on fire by mob in Jharkhand over dead cow. Usman Ansari a 60-year-old man was beaten unconscious by a mob after the carcass of a cow was found outside his house in Giridih district of Jharkhand.
June 29, 2017	Mohd. Alliumuddin, a meat trader was badly thrashed by around 30 people after they surrounded his van in the Bazaar Tand area of Ramgarh police station at Ramgarh, Deori area of Giridih district, Jharkhand. They dragged him out of the vehicle and beat him to death. The attackers also set Ansari's vehicle ablaze.
July 3, 2017	Three people were brutally beaten by the cow vigilant groups in Assam on the suspicion of carrying beef.
July 3, 2017	Otera Bibi a mentally retarded woman 42-yr-old, was brutally beaten, tied to a tractor and lynched to death at Murshidabad, West Bengal. after the woman was accused of being a child-kidnapper. The villagers ripped her clothes, shaved her head and went on lynching her 'mercilessly' says a witness in the Mithipur- Panagarh village.
July 8, 2017	Six people thrashed by mob of cow vigilant group for allegedly carrying cattle's (buffalos) at Baba Hardas Nagar, Delhi. A person named Ali Jaan was badly injured is currently under treatment.
July 11, 2017	A mob attacked Muslim guy named Iftikhar Alam 22 year old who works with Delhi Metro as mechanical helper was tied to a pole and brutally beaten at Sarai kale, new Delhi khan by the mob while on duty the mob accused him of eating beef and buffollo.

July 13, 2017	A Muslim family 10 women including, children, elders and a handicapped teen ager were brutally assaulted and molested in a train and robbed by a gang with iron rod and sticks between Mota and Nibkarori railway stations some 30b Km away from Farrukhabad junction.
August 02, 2017	An angry mob stripped, brutally thrashed a man in Jharkhand's Bokaro district Kathara locality after he was found with a girl belonging to other religion.
August 03, 2017	Three men were brutally beaten by the group of alleged Bajrang Dal activist on the suspicion of transporting beef in a truck on National Highway No. 84, in Shahpur, District Bhojpur in Bihar.
August 18, 2017	Hence this petition.



4. State of Arunachal Pradesh  
Through its Chief Secretary,  
Secretariat, Itanagar - 791 111 (A.P.)  
Arunachal Pradesh. ...Respondent no.4
5. State of Assam  
Through its Chief Secretary,  
Secretariat, Dispur, 781 001  
Guwahati, Assam. ...Respondent no.5
6. State of Bihar  
Through its Chief Secretary,  
Secretariat, Patna - 800 015, Bihar ...Respondent no.6
7. State of Chhattisgarh  
Through its Chief Secretary,  
Secretariat, Raipur, 492 001  
Chhattisgarh. ...Respondent no.7
8. Union Territory of Chandigarh  
Through its Administrator,  
Secretariat, Govt. of Chandigarh,  
Chandigarh - 160 001. ...Respondent no.8
9. Union Territory of Dadra & Nagar Haveli  
Through its Administrator  
Govt. of Dadra & Nagar Haveli,  
Secretariat, Silvassa, 396230  
Nagar Haveli. ...Respondent no.9
10. Union Territory of Daman & Diu,  
Through its Administrator,  
Govt. of Union Territory of Daman &  
Diu, Moti - Daman - 396 220  
...Respondent no.10
11. National Capital Territory of Delhi  
Through its Chief Secretary,  
New Secretariat Building,  
IP Estate, Delhi. 110 002. ...Respondent no.11

12. State of Goa  
Through its Chief Secretary,  
Secretariat, Panaji, 403 001 (Goa). ...Respondent no.12
13. State of Gujarat  
Through its Chief Secretary,  
Secretariat, Gandhinagar,  
Gandhi Nagar - 382 010 (Gujarat). ...Respondent no.13
14. State of Haryana  
Through its Chief Secretary,  
Secretariat, Chandigarh - 160 001  
Haryana. ...Respondent no.14
15. State of Himachal Pradesh  
Through its Chief Secretary,  
Secretariat, Shimla - 171 001,  
Himachal Pradesh. ...Respondent no.15
16. State of Jammu & Kashmir  
Through its Chief Secretary,  
Secretariat, Srinagar - 190 001  
Jammu & Kashmir. ...Respondent no.16
17. State of Jharkhand  
Through its Chief Secretary  
Secretariat, Ranchi-834 001  
Jharkhand. ...Respondent no.17
18. State of Karnataka  
Through its Chief Secretary  
Secretariat, Bangalore - 560 001.  
Karnataka ...Respondent no.18
19. State of Kerala  
Through its Chief Secretary,  
Secretariat, Thiruvananthapuram –  
695 001, Kerala. ...Respondent no. 19



20. Union Territory of Lakshadweep  
Through its Administrator  
Govt. of Lakshadweep,  
Kavaratti - 682 555, Lakshadweep. ...Respondent no.20
21. State of Madhya Pradesh  
Through its Chief Secretary,  
Secretariat, Bhopal - 462 004,  
Madhya Pradesh. ...Respondent no.21
22. State of Maharashtra  
Through its Chief Secretary,  
Secretariat, Mumbai- 400032,  
Maharashtra. ...Respondent no. 22
23. State of Manipur  
Through its Chief Secretary,  
Secretariat, Imphal – 705001,  
Manipur. ...Respondent no.23
24. State of Meghalaya  
Through its Chief Secretary,  
Secretariat, Shilong – 793001,  
Meghalaya ...Respondent no.24
25. State of Mizoram  
Through its Chief Secretary,  
Secretariat, Aizawl – 796001, Mizoram ...Respondent no.25
26. State of Nagaland  
Through its Chief Secretary,  
Secretariat, Kohima - 797001,  
Nagaland. ...Respondent no.26
27. State of Odisha  
Through its Chief Secretary,  
Secretariat, Bhubaneswar – 751001,  
Odisha ...Respondent no.27

28. Union Territory of Pondicherry  
Through its Chief Secretary,  
Government of Pondicherry,  
Pondicherry – 605001  
...Respondent no.28
29. State of Punjab  
Through its Chief Secretary,  
Secretariat, Chandigarh – 160001,  
Punjab  
...Respondent no.29
30. State of Rajasthan  
Through its Chief Secretary,  
Secretariat, Jaipur – 302005,  
Rajasthan  
...Respondent no.30
31. State of Sikkim  
Through its Chief Secretary,  
Secretariat, Gangtok – 737001,  
Sikkim  
...Respondent no.31
32. State of Tamil Nadu  
Through its Chief Secretary,  
Secretariat, Chennai – 600009,  
Tamil Nadu  
...Respondent no.32
33. State of Tripura  
Through its Chief Secretary,  
Secretariat, Agartala 799001, Tripura  
...Respondent no.33
34. State of Telangana  
Through its Chief Secretary,  
Secretariat, Hyderabad, Telangana.  
...Respondent no.34
35. State of Uttar Pradesh  
Through its Chief Secretary,  
Secretariat, Lucknow – 226001, (U.P)  
...Respondent no.35
36. State of Uttarakhand  
Through it Through its Chief Secretary,  
Secretariat, Dehradun – 248006,  
Uttarakhand.  
...Respondent no.36

37. State of West Bengal  
Through its Chief Secretary,  
Secretariat, Kolkata – 700001,  
West Bengal. ...Respondent no.37

38. Central Bureau of Investigation,  
Through its Director,  
Plot No. 5-B, 6<sup>th</sup> Floor, CGO Complex,  
Lodhi Road, Jawaharlal Nehru Stadium  
Marg, New Delhi – 110003  
...Respondent No. 38

**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 SHOWETH:**

54. This Public Interest petition under Article 32 of the Constitution of India relates to over 47 incidents of lynching, assaults and intimidation by vigilante groups making allegations of beef eating, cow protection and the like. The victims have invariably been Muslims, tribals and dalits. This petition contains the details of these cases. Petitioners have visited many of the families of the survivors as part of a civil society fact finding study of serious cases of mob lynchings, including the family of Junaid who was murdered on 22.6.17 while travelling on a train from Delhi to Ballabgarh while his two brothers were severely injured.
- 1A. The petitioner has not approached the concerned authorities for the same relief in this court or any other court.

2. The Petitioner No. 1 'KHUDAI KHIDMATGAAR' is a reputed and registered organization in India having its head office in New Delhi, established by none other than Mr. Khan Abdul Gaffer Khan also known as 'Badshah Khan' who was famously known as "Frontier Gandhi". The organization is working on issues relating to secularism, maintaining peace and communal harmony in the country and is registered through registration no. 4326 and authorizes Mr. Faisal Khan the Managing Trustees through the trust copy annexed with vakalatnama. Whereas petitioner No. 2 'AMAN BIRADARI TRUST' (Regd. No. 15899) a reputed and registered organization in India having its head office in New Delhi working on the issue of peace and harmony in India. The petitioner no. 3 is Dr. Kush Kumar Singh, a doctor by profession who along with the representatives of petitioner no. 1 is also working on the issue of creating social engineering of love and trust between the two religious communities in this period of hate and intolerance.
3. As the petition is being represented through petitioner no.1 through its managing trustee hence the Petitioner's complete name and complete postal address has been given in the memo of parties. The contact number of the representative of Petitioner no. 1 is 9999746196. His email address is [faisalKJ2002@yahoo.co.in](mailto:faisalKJ2002@yahoo.co.in), while the PAN number of the representative of Petitioner no. 1 is BJYPK7680H and his personnel yearly income is Rs. 1,80,000 whereas his Voter ID Card Number NVVD0839464.

4. The petitioner no.2 is represented through its Misaal Project Officer. The Petitioner's complete name and complete postal address has been given in the memo of parties. The contact number of the representative of Petitioner no. 2 (Ms Naseema Khatun) is 096730 18195. Her email address is [naseemawb@gmail.com](mailto:naseemawb@gmail.com), while the PAN number of the representative of Petitioner no. 2 is CLUPK5389R and her personal yearly income is Rs. 3,36,000 whereas her Voter ID Card Number is 5869 3711 9192.
5. The contact number of the Petitioner no. 3 is +91- 8375932990 and his email address is [singhkushkumar@yahoo.com](mailto:singhkushkumar@yahoo.com), The PAN number of the Petitioner no. 3 is BXRPS8975D his personnel yearly income is Rs. 6 Lac whereas the AADHAR Card Number of the petitioner no. 3 is 603570637552.
6. The Respondent No. 1 is Union of India through Ministry of Home Affairs which is responsible to maintain the rule of law in the country and the responsible authority to who directs the Police force to implement the law and order situation across the country whereas Respondent No. 2 to 37 are the States and Union territories through their State Chief secretaries who miserable failed to implement the law and order in their respective states and are responsible to give free hand to these private vigilant groups and Respondent No. 38 is the Central Bureau of Investigation

through its Director, for conducting the investigation & prosecution of cases of mob lynching.

7. At the outset petitioners state that there are 3 petitions are pending in the Supreme Court namely Writ Petition (C) 754 of 2016, Tehseen S Poonawalla vs. Union of India; Writ Petition (C) No. 764 of 2016 Mohanbhai Hamirbhai Bedva vs. Union of India & Ors. and Writ Petition (C) No. 768 of 2016 Martin Chhotubhai Macwan vs. Union of India, seeking certain reliefs in respect of the lynching and assaults and this Hon'ble Court issued notices against six states asking the government why these vigilante groups should not be banned. The three abovementioned Writ Petitions have been tagged together and on 07.04.2017 this Hon'ble Court was pleased to pass the following order:

*"Issue notice, fixing a returnable date within three weeks.  
Dasti, in addition, is permitted..."*

8. Whereas the earlier petitions were filed with limited data and research this petition has been filed using 75 media reports and 13 Fact Finding Reports done by NGOs and social action groups (set out at serial 8 to 95 of the Index of Annexures) as well as references to 23 TV channel reports regarding the hate speech at (paragraph 11) of this petition; 31 instances of deaths caused and rape cases at Chart B (paragraph 16) and 16 instances of serious injuries caused as set out in Chart C (paragraph 17). Chart B last

column also sets out the status of the criminal proceedings. Out of 31 matters, in 2 matters (serial no. 2 and 3) FIR of the victims have not been registered. In 2 matters (S.No. 11, 14) the investigation/ prosecution has been transferred to the CBI. In the remaining 27 matters the criminal proceedings are virtually at a standstill and it appears to the victim families that the police and the accused are colluding to ensure that the accused escape criminal prosecution.

9. The incidents that have happened are not isolated or unconnected, rather, are part of a well thought out plan by vested interests. The conspiracy invariably begins at the top where politically senior persons and senior religious leaders have instigated their followers to attack and kill Muslims, dalits and alleged beef eaters. In most cases the allegation of beef eating was fabricated. In any case, no person has the right to take the law into his own hands and dispense extra-judicial justice to any other citizen of India.
10. There are incidents where no FIR has been registered by the police even after the death of the victims assaulted by the cow vigilante groups or police themselves. There are incidents where non action by the police resulted in second incident of lynching by the same accused. There are number of incidents where the cross FIR's has been registered against the eyewitnesses to terrorise them, which clearly shows the bias functioning of the police. There are number of cases where the role of the prosecution dealing such cases is

questionable as the accused gets an easy bail even before the chargesheet is prepared.

11. The chart of the incidents of instigation for the commission of hate crimes within the meaning of section 153A & B, section 295A & 298 and 505 IPC and other similar sections are as under:

**Chart - A**

<b>Date &amp; Place</b>	<b>Newspaper TV channel Website</b>	<b>Speaker</b>	<b>Words uttered</b>
June 8,2017 Roorkee	First post	Sadhvi Prachi, VHP leader	"Hindustan ko congress mukt to kardiya lekin aaj ki jo zarurat hai vo mai samajhti hu ki <b>Hindustan ko muslim mukt bharat karne ke liye humein kaam karna chahiye</b> or hum kaam kar rahe hain" (Now that we have achieved the mission of making a India free of Congress, it is time to make India Muslim-free).
August 2015	Aaj Tak	Sadhvi Prachi, VHP leader	" <b>Ye Hindustan ka bahot bada durbhagya hai. Hindustan ki sansad me ek do aatanki baithe hain. Isse bada durbhagya mai ni samajhti Hindustan ka aur koi ho sakta hai.</b> Jo ek court ke faisle ki avmanna mere vichaar se kar rahe hain. Kyuki court ne ye saabit kardiya hai ki ye ek



<p>October 2015</p>			<p>atankwadi hai to usko jo atankwadi ko samarthan kar rahe hain to vo sab mai samajhti hu atankwadi hain. Or desh ka durbhagya hai ki aise atankwaadi sadan me baithe hain. It is a big misfortune that in the Indian Parliament, we have one-two terrorists sitting there.</p>
<p>June, 2016</p>	<p>Aaj Tak</p>	<p>Sadhvi Prachi, VHP leader Prachi, VHP leader</p>	<p>On Dadri Lynching, <b>“jo gau maas khate hain unke sath yahi hashr hona chahiye.</b> Humari maa ke tukde tukde karke khane se jinhe Jannat milti hai or vo kisi hindu ne uski hatya ni ki, akhlaq ke bhai ne khulasa kiya hai kisi aapsi ranjish me maare gae hain. Keval use taul diya jar aha hai azam khan or owaisi dwara. Uttar Pradesh me jitney bhi dange hote hai azam khan ka haath hota hai. Those who consume beef deserve such actions against them”.</p>
	<p>News Nation</p>	<p>Sadhvi Prachi, VHP leader</p>	<p><b>“..Arab Rashtro se Hindustan ki Hindu betiyo ko phasane ka gehra shadyantra hai or isko humein samajhna chahiye 7 lakh brahman ki beti ko</b></p>

		Prachi, VHP leader	<b>phasane ke liye milta hai, 5 lakh Kshatriya or Vaishya ki beti ko phasane ke lie or 2 lakh shudr ki beti ko. Humein samajhna chahiye Hindustan mai ho kya raha hai...</b> " (She said Muslim youths riding "shining bikes" gather "outside girl's colleges" and take up a Hindu name to woo girls from the community. "He will marry our girls. That is love jihad conspiracy of Arab nations which give Rs 7 lakh for marrying a Brahmin, Rs 5 lakh for a Vaish, Rs 3 lakh for a Thakur and Rs 2 lakh for a Shudra," she claimed.} (news nation june 2016)
October 16, 2015	Hindustan Times	Manohar Lal Khatta, Haryana CM	"Muslim rahein, magar is desh mein beef khaana chhodna hi hoga unko. Yahan ki manyata hai gau" (Muslims can continue to live in this country but they will have to give up eating beef)"
20 April 2017	Times Of India	Uma Bharti	<b>Ayodhya ke liye, Ganga ke liye, Tiranga ke liye,mai koi bhi saza bhugatne ke liye tayyar hu.</b> I can go to any extent for Ram, Cow, Ganga and Tiranga.

February 2017	India Today	Sakshi Maharaj	<p><b>"..Vishwa me jitne bhi Islamic desh hain wahan kisi bhi prakaar se koi Qabristan hota hi nahi hai. Wahan to jalaya jata hai..."</b> regarding the issue of allotment of land for graveyard and sanction of fund for maintain its outer walls in election rally.</p>
September 14, 2017	The Indian Express	Sakshi Maharaj	<p><b>"..Madarson mein atankvad ki shiksha di jati hai. Students ko jihadi banate hain," (students are educated in terrorism in the madrasas. They are made jihadis)..."</b></p>
May 15, 2015	The Hindu	Sakshi Maharaj	<p>"Maharaj allegedly used abusive language against police officials and threatened to "take revenge" if BJP came to power in the state after the 2017 Assembly polls.</p>
October 18, 2015	India TV	Sakshi Maharaj	<p>On Dadri Lynching <b>"Seedhi si baat hai humari maa ka koi apmaan karega hum sehen nahi karenge, mar jaenge maar denge.</b> Bharat mata ke upar koi ungli uthata hai koi atanki to humare log sahi bhi hote hain maarte bhi hai"</p>

January 7, 2015 Meerut	Zee News	Sakshi Maharaj	<b>"..Hum nivedan karna chahte hain ki kam se kam 4 bachche paida karo. Hindu women should atleast produce four children..."</b> (To counter Muslim population growth rate).
September 2014 Noida	The Times Of India	Yogi Adityanath	<b>"..Agar ek hindu ka khoon bahega to ek hindu ke khoon ke badle ane wale samay me hum prashasan se FIR darj nahi karwaenge lekin kam se kam 10 logo ki aise hi hatya karwange.."</b>
24 February 2015	Zee News/ Aaj Tak	Mohan Bhagwat, RSS Chief	Mother Teresa ki seva achchi rahi hogi, par iske peeche ek uddeshya rehta tha, jiski seva ki ja rahi hai vo isai ban jae. Koi kisi ko isai banae na banae uska prashn nahi hai. Parantu seva ki aad me vo kiya jata hai to us seva ka amulyan ho jata hai. <b>(There was a motive behind the service Mother Teresa provided to the poor — to convert them to Christianity).</b> <b>"..Agar England me rehne wale angrez hain, Germany me rehne wale german, America me rehne wale American hain</b>

			<b>to Hindustan me rehne wale sahi log hindu kyu nahi ho sakte. Hindutva hi humare rashtra ki pehchan hai..."</b>
July 2017 Goa	Indian express	Sadhvi Saraswati, President Sanathan Dharma Prachar Seva Samiti, Madhya Pradesh	<b>"Humare sar se paani upar jaa chuka hai, isiliye humein Hindu Rashtra chahiye"</b> (By 2023, Hindu Janajagruti aims at making India a Hindu rashtra (Hindu nation))" <b>"..Gau humari mata hai, agar kasaiyo ka gala nahi kata to ye baaz nahi aenge. To humein Kendra Sarkar se nivedan karna padega ki gau hatya karne walo ko phaansi ki saza mile or inka gala kata jae. Agar bharat Hindu rashtra banega sabhi samasyaein apne aap hi mit jaengi."</b> "Beef eating is like eating mother's meat, and therefore, such people should be hanged in a public square and when their bodies are hung publicly, no one will dare to eat beef".
April 2017 Jaipur	Indian Express	Gyan Dev Ahuja, BJP MLA	<b>"Kanoon humko haath mein nahi lena chahiye. Lekin uski maut hui. Uske</b>

			<p><b>liye humko koi afsosh nahi hai. Aur afsosh karoonga bhi nahi kyunki jo gau taskar hain, gau hatyare hain, aise paapiyon ka yehi harsh hota raha hai, hota rahega...”</b> (We should not take law into our hands. But we have no regret over his death [Pehlu Khan] because those who are cow-smugglers are cow-killers, sinners like them have met this fate earlier and will continue to do so}</p>
October 2015, Dadri	The Hindu	Sangeet Som, BJP MLA	<p>Without naming Muzaffar Nagar riots, Mr. Som warned, “kanoon kanoon ki tarah kaam kare. Warna, ham pahle bhi muhtod jawab de chuke hai aur aage bhi denge [the law should act as law. Otherwise, we have given a strong reply in the past and would do that in future as well]”. While keeping with his Hindutva image in western UP, <b>Mr. Som refused to condemn the mob lynching of Akhlaq.</b> When The Hindu asked Mr. Som if he would go condemn the murder, he smiled and said, “Let the enquiry report come</p>

			as to what happened that day". <b>He also met the families of accused arrested for inciting and killing Akhlaq. He assured the families, the crowd that he would try to get them out on bail.</b>
January 2017	Indian Express	Hukum Singh, BJP MLA	<b>"..If I emerge as the winner (in UP polls), curfew will be imposed in Kairana, Deoband and Moradabad..."</b>
December 2012	The times of India	Akbaruddin Owaisi, President of the AIMIM	<b>"..Agar bharaat se police ko hata liya jae to 15 minute k andar yahan k 25 crore musalman 100 crore hinduo ka khatam kar sakte hain.."</b>
March 2016	Extract from NCM report on Latehar lynching (Mazloom Ansari and Imteyaz Khan).	Gopal Maniji Maharaj	"The residents mentioned a Baba Gopal Maniji Maharaj from Dehradun who started coming to the region in 2012 and initiated this movement which has since become more widespread... the locals report that at meetings of these committees, there is incitement to hatred and an attempt to target Muslims in the name of cow protection".
March, 2016	Extract from HRLN fact finding report on	Chintamani	"The villagers also informed that a Hindu Baba named Chintamani from Utrakhand came and moved in the

	latehar lynching.		entire area and propagated the ideology to hang and kill the Muslims to protect cows. This incident is the outcome of this Prawachan only. This entire program was organized and funded by the local BJP Member of Parliament.”
July, 2017	Youtube	Sadhvi Deva Thakur	She threatened the Muslims to avenge the killings of Hindus at Amarnath Yatra 2017 by Killing Muslims during Haj Pilgrimage.
August, 2017	Youtube	Sadhvi Deva Thakur	In a video full of abuses where she talks to repeat Gujarat like incidents to teach a lesson to Muslims. The words uttered were so vulgar that it cannot be mentioned here.

12. For the abovementioned hate crimes petitioners seeks the registration of an FIR, just and proper investigation and prosecution by a SIT under the monitor of this Hon'ble Court consisting of officers from outside the state where the incident has taken place. Petitioner states that no meaningful action has been taken against the person abovementioned.

13. Section 153A of IPC read as under:



“Promoting enmity between different groups on grounds of religion, race, place of birth, residence, language, etc., and doing acts prejudicial to maintenance of harmony”.

14. Section 153B of IPC read as under:

“Imputations, assertions prejudicial to national-integration.”

15. Section 295 A of IPC read as under:

“Deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs”

16. Section 298 of IPC read as under:

“Uttering, words, etc., with deliberate intent to wound the religious feelings of any person.

17. Section 505 (1) c read as under:

“1(c) with intent to incite, or which is likely to incite, any class or community of persons to commit any offence against any other class or community, shall be punished with imprisonment which may extend to 6[three years], or with fine, or with both.

(2) Statements creating or promoting enmity, hatred or ill-will between classes.

16. In respect of the above mentioned instigations by various leaders and religious preachers the harmonious atmosphere of the country has been polluted slowly and gradually resulting in the number of

incidents of lynchings that resulted in deaths and rape has been set out in a summary Chart – B prepared by the petitioner which is as under:

**Chart – B**

<b>S.No</b>	<b>Date</b>	<b>Place and Particulars/ Incident</b>	<b>Action taken/ proceeding of the case</b>
1.	August 23, 2013	<b>Kairana, Shamli, U.P:</b> Salim, of Malakpura, Kairana, Shamli, UP, was attacked by Gau Rakshaks in Panipat, Haryana, when returning from Babel, Panipat, after purchasing cattle for animal husbandry purposes. Died in hospital 3 days later.	An FIR under the cow slaughter act was filed against Salim, victim. Later, on 26.08. 2013, FIR No. 314 was registered at P.S. Panipat Sadar u/s 148, 149, 323 on the basis of Salim's statement. These included, even after Salim's death, FIR registered u/s 304 IPC and not 302 IPC. A few accused persons were arrested and were granted bail. Victim's family claim Panipat police was putting pressure on them to compromise the case. No progress in case.
2.		<b>Nizamuddin, New Delhi:</b> Arif Quresihi, of Singar, Punhana, Nuh. Tortured in police custody, Nizamuddin Police station, New Delhi. Succumbed to injuries sustained in the	FIR filed in PS Hazrat Nizamuddin u/s 279, 338 and 339 IPC, r/w section 25, 54, 27 and 59 of Arms Act and Section 3 and 12 of Prevention of Cruelty to Animals Act, 1960.

		beatings.	Victim's family unable to have a FIR in respect of Arif's death filed, due to fear.
3.	August 06, 2013	<b>Surajkund, Faridabad:</b> Farid and Sher Singh (both of Pema Kheda, Punhana, Nuh, Haryana), murdered, and Taufiq, injured for life, in Gau Raksha Dal vigilante attack in Ankheer, near Surajkund, Faridabad.	an FIR dated 7.08.2013, was filed against 8 unknown people in PS Surajkund Dist Faridabad u/s 179, 279, 304A, 429, 307, 34 IPC, Section 25, 54, 59 Arms Act, Section 3, 4. The Punjab Cow Slaughter Act, 1955. NO FIR pertaining to the mob lynching of Sher Singh, Farid and Taufiq was filed by the police. Parents of the deceased have filed a case in HC to investigate the cause of their sons' deaths. No progress with the case, and too scared to approach the police to file FIR in lynching of their sons.
4.	June 6, 2014	<b>Pune, Maharashtra:</b> Mohsin Sadiq Shaikh, a 24-year-old from Solapur district, who worked as an IT manager with a private firm in Pune was beaten to death by the mob of radical Hindu outfit on the basis of his Muslim identity	Out of 21 accused 15 have been granted bail in the matter so far. Charge-sheet filed but charges not framed till date. In a shocking order passed by the Bombay High Court which granted bail to three of 21 arrested on January

		<p>after he was returning home from offering namaz.</p>	<p>12, 2017 which says: "the fault of the deceased was only that he belonged to another religion. I consider this factor in favor of the applicants/ accused. Moreover, the applicants/ accused do not have any criminal record and it appears that in the name of the religion, they were provoked and have committed the murder".</p>
5.	March 16, 2015	<p><b>Nagalpatti, Khizrabad, Yamunanagar, Haryana:</b> Tahsin earn his living by selling and purchasing cattle. After doing some purchasing from different village while returning home Tahsin along with his friends Ayub and Kallu were attacked by a group of 8-10 people, Kallu and Ayub managed to escape but Tahsin was tied with a rope used for pulling an OX and was assaulted by the mob. The dead body of Tahsin was recovered from the Western Yamuna Canal five days after the incident.</p>	<p>Police inaction led to a second incident of mob lynching by the same accused. At second stance FIR bearing No. 39/2015 PS Khizarabad, District Yamuna Nagar was registered. Four accused arrested. Vide judgment dated 25.01.2016, the Sessions Judge, Yamuna Nagar District, convicted Subhash Chand u/s 304 Part II and the other 3 accused were acquitted. Accused Subhash was sentenced to undergo imprisonment of 5 years. No appeal was filed in the High Court against the judgment of the Sessions</p>

			Court by the State of Haryana. The family of the deceased could not file an appeal due to lack of money and resources to follow the case further.
6.	May 30 2015	<b>Nagaur dist. Rajasthan:</b> Abdul Ghaffar Qureshi, 60, who ran a meat shop in Birloka village in Nagaur district, was beaten brutally by a mob with sticks and iron rods on May 30, 2015. He died the following day. The mob also vandalized his home and shop.	Two years after the incident, the police have filed murder charges against three accused in the attack, while six are yet to be arrested.
7.	August 2, 2015	<b>Dadri, Uttar Pradesh:</b> A mob beat to death three men accused of stealing cattle – Anaf, Arif, and Nazim – in the Kaimrala village of Dadri town on August 2, 2015. The mob also set their truck on fire after they found two buffaloes in it.	FIR u/s 302 registered by the the Police, 6 days after the murder, only after public pressure. Police filed an FIR against the boys on the next day of the incident stating that they were caught by the people in the village stealing cows and were assaulted by the mob. No arrests made - no investigation. Victims unable to travel to Dadri PS and courts, due to fear of being attacked by the accused.

8.	September 28, 2015	<p><b>Dadri, Uttar Pradesh:</b> Mohammed Akhlaq, a 52 year old resident of the Bisada village in UP's Dadri was lynched to death and his son, 22-year-old Danish seriously injured by a mob for suspected storing of cow meat in the freezer.</p>	<p>19 people were named in the FIR and were arrested, one of the accused Ravin Sisodia died in jail due to chikanguniya fever who was draped with the tricolor on his body to project him as a martyr. With the bail of key accused Vishal Rana who was charged u/s 302,307, 147, 148, 149, 323, 427, 458, 504 and 506 of IPC and section 7 of criminal Law Amendment Act, only three are in jail. State govt. has not challenged any bail order so far. FIR has also been filed against the victim and his kin, for allegedly possessing beef.</p>
9.	October 9, 2015	<p><b>Udhampur, Jammu and Kashmir:</b> A right-wing mob in Udhampur district of Jammu and Kashmir allegedly threw gasoline bombs at a truck driven by Zahid Bhat, an 18-year-old trucker, because they suspected him – wrongly – of transporting beef. He died of his injuries at a hospital 10 days later. Two others travelling with him</p>	<p>FIR lodged some accused arrested but released on bail.</p>

		were also injured.	
10.	October 14, 2015	<b>Himachal Pradesh:</b> A violent Hindu mob at Sarahan, a village near Simla, allegedly beat to death Noman Zahid , 22, a resident of Uttar Pradesh, on October 14, 2015, over suspicions that he was smuggling cows. The mob also beat up four other occupants of the truck.	FIR u/s 302 and cross case u/s 429 going on in Distt Sirmaur HP.  Charge-sheet filed in the first case. Second case at the stage of evidence. Reported pressure and threats from accused, on victim families, and witnesses, to effect a compromise.
11.	March 3, 2016	<b>Kurukshetra, Haryana:</b> Mustahsin Abbas, was killed by Gau-Rakshaks in Kurukshetra district, while transporting cattle he and a few friends had purchased from Shahabad.	Body obtained only after moving HC, 6 days after the incident. Initial FIR filed against victims and co-travelers. (FIR No.124 dated 06.03.2016 under Section 11 of the Prevention of Cruelty to Animals Act read with Section 307 IPC and Section 25 of the Arms Act was registered at Police Station Shahbad).  Vide Order dated 18.03.2016, the High Court transferred the case to CBI to investigate the matter, including investigating the role of Police and magistracy.  After HC intervention, Fir

			filed u/s 302 etc., of Mustahsin's murder. CBI investigation still ongoing.
12.	March 18, 2016	<b>Latehar, Jharkhand:</b> Two men were hanged from a tree after being mercilessly beaten up by unruly cattle-protection vigilantes in Latehar district, Jharkhand. A Muslim cattle trader, Mohammed Mazlum Ansari, 35, and a 12-year-old boy, Mohd. Imtiyaz Khan, were found hanging from a tree in Jharkhand for allegedly smuggling cows. But later, it was revealed that they were cattle herders.	The case being G.R. Case No 176/2016 is currently on Evidence Stage. 8 Accused persons were arrested and have all been granted bail by High Court. Since, family members and neighbors claim, they have been threatened by the accused.
13.	July 6, 2016	<b>Sodhana, Gujarat:</b> A Dalit man Rama Singrahiya, 42, was allegedly beaten to death using clubs and axes in Gujarat's Sodhana village located 30 km away from Porbandar.	
14.	August 2016	<b>Mewat, Haryana:</b> A Muslim woman and her 14-year-old minor cousin were allegedly gang-raped after being accused of eating beef. Two other	FIR No. 247 in PS Tauru, Mewat District was registered against 4-5 unknown person u/s 376-D, 459, 460 IPC, Section 6 of POCSO Act, 2012



		<p>relatives (Ibraheem and Rasheedan) were murdered. The woman later denied eating beef.</p> <p>Four men were arrested and charged with rape and murder.</p>	<p>Section 25/54 of Arms Act, 1959. After registration of the FIR, no action was taken by the police. Due to public pressure case was handed over to CBI but CBI is also not investigating the matter seriously, as till December 2016, CBI officials had not even visited the place of occurrence even once. The victim's family had filed a writ petition in the High Court of Punjab and Haryana, Sarjina vs. State of Haryana &amp;Ors. CRM-M No. 41814 of 2016, seeking that the investigation may be done under the supervision of the Hon'ble High Court. The case is pending for the CBI Status Report.</p>
15.	August 2016	<p><b>Udapi, Karnataka:</b> The cow vigilantes killed a local BJP worker in Karnataka over the alleged cow smuggling. Praveen Poojary (29) was beaten to death with steel rods allegedly by activists of the Hindu Jagrana Vedike (HJV) for transporting cattle at Karjike in Udupi</p>	

		district.	
16.	September 2016	<b>S.G.Highway, Gujarat:</b> Mohammed Ayub was beaten to death by cow vigilantes on the suspicion that he was transporting cows for slaughter on S G Highway, Gujarat. Ayub died in hospital days later.	The police had reregistered 2 FIRs, the first against Sameer Shaikh and Ayub under the Cow protection act and other against the cow vigilante u/s 307 IPC.
17	October 9, 2016	<b>Jamtara, Jharkhand:</b> Minhaj Ansari, picked up by police, on instigation by Gau-Rakshak Dal for posting objectionable content on Facebook. Tortured in police custody, with police supported by Gau-Raksha Dal member Sonu Singh. Died in hospital.	Mother of the deceased filed an FIR No. 154/16 u/s 354, 341, 342, 323, 325, 307, 504, 506 and 34 IPC in PS Narayanpur, Distt Jamtara against SI Harish Pathak. Though police earlier denied the allegations of excesses, they've now admitted that there were prima facie lapses on the part of the officer-in-charge of P.S. Narayanpura Sub-Inspector Harish Pathak who has been suspended and an FIR of murder has been registered against him.
18.	January 22 -23, 2017	<b>North - 24 Parganas, Nadia - Bengal:</b> A 22-year-old youth was beaten to death by a mob while on a vagabond in the North 24 Parganas,	

		Bengal.	
19.	March 9, 2017	<b>Tripura:</b> A Muslim security guard was lynched to death in Tripura who was allegedly part of a group of 12 who had come with intentions of robbery in a village. The incident occurred at Siddhinagar village under PuranRajbari Police Station in southern Tripura along the Bangladesh border.	
20.	April 1, 2017	<b>Alwar, Rajasthan:</b> A Muslim man named Pehlu Khan, 55, was lynched by a mob of hundreds of cow vigilantes in Alwar in Rajasthan. He was beaten badly and died two days later in a hospital. He was lynched for allegedly transporting cows. It was later found that he was taking the cows for his dairy farm.	FIR No. 255/2017 registered u/s 323, 143, 341, 147 and 379 IPC all bailable sections against the six accused where as two separate FIRs filed against the victims under non bailable sections. It was only after the death of Pehlu Khan that 302 were incorporated in the FIR even after grave injuries to the other victims section 307 is not incorporated. Bail application of the accused rejected by session judge.  Charge-sheet not filed.
21.	April 30, 2017	<b>Nagaon, Assam:</b> A mob lynched two men in Nagaon district of Central	10 accused are arrested in the matter and booked under section of

		Assam on suspicion of them being cow thieves. Abu Hanifa, 23, and Riazuddin Ali, 24, were chased down by a village mob and assaulted brutally, both of them died of their injuries.	341/302/34 IPC. Charge-sheet not filed.
22.	May 2, 2017	<b>Bulandshahr, Uttar Pradesh:</b> A mob of right wing activists lynched an old man, Ghulam Mohammad, after a boy from the village eloped with a woman from a different community. Ghulam Mohd was beaten to death.	Despite complaint filed by family members, with the police regarding life threat from Hindu Yuva Vahani, no action was taken, next day; the same group attacked and killed Ghulam Mohd. 9 accused were arrested now some of them are on bail.
23.	May 12-13, 2017	<b>Jadugora / Asanboni, Jharkhand:</b> Two persons were lynched by the violent mob over suspicion of being a child-lifter at Asanboni village in Jadugorathana area, about 40km from Jamshedpur, making it the second killing and fourth assault within 24 hours.	
24.	May 18, 2017	<b>Jamshedpur, Jharkhand</b> : Seven persons, including two brothers returning from work linked to the Swachh Bharat campaign,	FIRs have been registered at the Rajnagar P.S Case No. 29, 30, 31& 32 of 2017. The case is at the stage of investigation and

		<p>were beaten to death by mobs in two attacks over last 24 hours in tribal-dominated areas near Jamshedpur following rumours of gangs involved in kidnapping children being active in the region. 4 of those lynched – Shaikh Naeem, Shaikh Haleem, Shaikh Siraj and Shaikh Sajju, were cattle traders that were killed by a mob on allegations of transporting cattle for slaughter.</p>	<p>the police have arrested some accused persons from them some are granted bail.</p>
25.	June 23, 2017	<p><b>Ballabgarh, Haryana:</b> A minor Muslim boy namely Junaid was allegedly stabbed to death and four others two of them his real brothers were injured on board a Mathura-bound train, between Okhla and Asoti in Haryana, a distance of about 60 km when an argument over a seat turned into religious slurs and triggered a mob attack on family members returning home from Eid shopping.</p>	<p>Six accused arrested by the police but three of them were granted easy bail within a month even before the charge-sheet is being prepared. On 30.7.2017 one of the accused Chander Prakash was granted bail by the Court of ASJ, Faridabad. On. 3.8.17 two other accused Pradeep and Gaurav were bailed out.</p> <p>Injured are being medicated at home due to fear of being attacked or killed as being an eyewitnesses.</p>

26.	June 23, 2017	<p><b>North Dinapur, West Bengal:</b> Three people were lynched in West Bengal's North Dinajpur district after they were allegedly caught stealing cows from a house. Those killed have been identified as Mohammad Nasir (30), NasirulHaque (32) and Mohammad Samiruddin (33).</p>	<p>An FIR was lodged by Sunaina Bibi, wife of deceased Md Samiruddin on 23.06.2017 in Chopra P.S u/s 304/34 of IPC. The police have so far arrested 3 accused in the case and the investigation is ongoing. Currently all the accused persons have been released on bail and the Chargesheet has not yet been filed.</p>
27.	June 23, 2017	<p><b>Srinagar, Kashmir:</b> Mohammad Ayub Pandit the serving Superintendent of Police in J &amp; K Police was lynched to death by the extremist Muslim mob outside the Jama Masjid of Srinagar suspecting as the informer of the police while he was on duty.</p>	<p>Police registered a case vide FIR No 51/2017 u/s 302 IPC in Police Station Nowhatta, Srinagar, J&amp;K.</p> <p>Two accused Muhammad Danish and Mudasir Ahmad were arrested in connection with the killing of Pandit.</p>
28.	June 26, 2017	<p><b>Pratapgarh, Jaipur, Rajasthan:</b> Rajasthan officials beat man to death after he objects to their photographing women defecating in open. Zaffar Hussein, a CPI (ML) member and activist, was allegedly beaten to death by civic officials after he objected to them taking</p>	

		photographs of women defecating in the open.	
29.	June 29, 2017	<b>Ramgarh, Deori, Giridih district, Jharkhand:</b> Mohd. Alliumuddin, a meat trader was badly thrashed by around 30 people after they surrounded his van in the Bazaar Tand area of Ramgarh police station. They dragged him out of the vehicle and beat him to death. The attackers also set Ansari's vehicle ablaze.	FIR No. 198/17 was registered at PS Ramgarh dated 29.06.2017 by the deceased's wife u/s 147, 149, 302 and 34 IPC against the 12 accused persons. A cross case regarding cruelty to animals and possession of beef has been filed in PS Ramgarh, FIR No. 199/17 against the deceased and Kalimuddin. The family of the deceased stated that initially police was very active and arrested 5 named and 7 unnamed accused persons on the basis of video footage. But after the protest & rally by the Ex BJP MLA, Ramgarh, Shankar Chowdhury, the police have stopped arresting the accused. Only an amount of Rs. 2 Lakhs has been given as compensation.
30.	July 3, 2017	<b>Assam:</b> Three people were brutally beaten by the cow vigilant groups in Assam on the suspicion of carrying beef.	

31.	July 3, 2017	<b>Murshidabad, West Bengal:</b> Otera Bibi a mentally retarded woman 42-yr-old, was brutally beaten, tied to a tractor and lynched to death after the woman was accused of being a child-kidnapper. The villagers ripped her clothes, shaved her head and went on lynching her 'mercilessly' says a witness in the Mithipur- Panagarh village.	An FIR bearing FIR No. 441/17 dated 27.06.2017, was registered in PS Raghunath Ganj u/s 341, 323, 325, 308 and 34 IPC against unknown persons by Sanad Sk (father of the deceased). The police have so far arrested 12 accused persons, while many others are still absconding.
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17. Similarly in respect of the incidents of lynchings where people were seriously injured has been set out in a summary Chart – C which is as under:

**Chart – C**

<b>S.No</b>	<b>Date</b>	<b>Place and Particulars/Incident</b>	<b>Action taken/ case status</b>
1.	January 13, 2016	<b>Harda, Madhya Pradesh:</b> A Muslim couple on train beaten in MP over beef suspicion. The couple was among passengers assaulted by at least seven members of the Gau-Raksha Samiti at Khirkiya railway station, in Harda district of Madhya Pradesh, when they objected to their luggage being searched on suspicion that they were carrying beef.	



2.	June 10, 2016	<b>Mewat, Haryana:</b> Muslim beef transporters beaten, forced to eat cow dung by GauRakshak Dal in Mewat, Haryana. GauRakshak Dal, a self-proclaimed cow protection group in Haryana had beaten two Muslim men namely Rizwan and Mukhtiar who were allegedly transporting beef and forced them to eat cow dung.	
3.	July 2016	<b>Una, Gujarat:</b> Four Dalits were stripped and brutally beaten in public by local Shiv Sena members in a village of Gir-Somnath district for skinning a dead cow. The victims, who are engaged in skinning in Mota Samadhiyala village near Una town, had brought dead cows.	FIR No: 127/2016 filed at Una police station, accusing 46 people. Out of which the Victims named 6 persons – out of which three has been arrested. Charge sheet filed. Criminal case No. 94/2016 pending.  12 accused are bailed out by session's and High courts.
4.	May 30, 2017	<b>Chennai, Tamil Nadu:</b> A PhD scholar in IIT, Madras, was at one of the vegetarian messes on campus, when he was attacked–	

		allegedly for eating beef.	
5.	April 15, 2017	<b>Muzaffarpur, Bihar:</b> A motorcyclist was lynched and his throat slit after he accidentally hit a goat. Navin Kumar, 45, a farmer of Patti Bandhu Rao village under Lalganj police station of Vaishali, was thrashed mercilessly before his throat was slit by a mob for injuring the goat. His friend and pillion rider Sikandra Sahni, was severely injured in Muzaffarpur.	
6.	April 21, 2017	<b>Reasi, Jammu &amp; Kashmir:</b> A Muslim nomad family was brutally attacked by vigilantes. A family of five, including a 9-year old girl, were attacked and injured; police arrested 11 so-called cow vigilantes in connection with the attack.	
7.	April 22, 2017	<b>Kalkaji, Delhi:</b> Group of rights activist's purportedly animal rights activists allegedly belonging to People for Animals, which is led by a BJP official, beat up three men in a truck for transporting buffaloes.	
8.	April 29, 2017	<b>Bihar:</b> A man was blinded for honking at cow wandering in the middle of the highway.	
9.	May 21, 2017	<b>Jaipur, Rajasthan:</b> Jaipur, Rajasthan: A 19-year-old Qasim, who works at the Hayat Rabbani hotel, was assaulted by a group of	FIR No. 46/2017 filed with bailable offence u/s 143, 451 and

		cow protection vigilantes on the accusation of throwing a plastic bag of discarded meat in the dumping ground. The vigilantes claimed that bag contained beef.	323 of IPC whereas strong FIR No. 45/2017 filed against the victim u/s 295 IPC. No arrest made in the case in FIR against the accused whereas the victim was arrested in an FIR made by the accused.
10.	June 11, 2017,	<b>Rajasthan:</b> Despite having a no-objection certificate (NOC) and official permission from police and other authorities, officials of the animal husbandry department of Tamil Nadu's govt. were attacked by cow vigilantes in Rajasthan for transporting cows in five trucks.	
11.	June 27, 2017	<b>Ranchi, Jharkhand:</b> Man thrashed, house set on fire by mob in Jharkhand over dead cow. Usman Ansari a 60-year-old man was beaten unconscious by a mob after the carcass of a cow was found outside his house in Giridih district of Jharkhand.	
12.	July 8, 2017	<b>Baba Hardas Nagar, Delhi:</b> Six people thrashed by mob of cow vigilant group for allegedly carrying cattle's (buffalos). A	

		person named Ali Jaan was badly injured is currently under treatment.	
13.	July 11, 2017	<b>Sarai Kala Khan, New Delhi:</b> A mob attacked Muslim man named Iftikhar Alam 22 year old who works with Delhi Metro as mechanical helper was tied to a pole and brutally beaten by the mob while on duty the mob accused him of eating beef and buffollo.	
14.	July 13, 2017	<b>Mainpuri (U.P.):</b> A Muslim family 10 women including, children, elders and a handicapped teenager were brutally assaulted and molested in a train and robbed by a gang with iron rod and sticks between Mota and Nibkarori railway stations some 30b Km away from Farrukhabad junction.	
15.	August 02, 2017	<b>Bokaro, Jharkhand:</b> An angry mob stripped, brutally thrashed a man in Jharkhand's Bokaro district after he was found with a girl belonging to other religion. The man identified as Mohammed Shakir sustained serious injuries after he was assaulted by a mob on Tuesday (August 1) in Bokaro's Kathara area.	
16.	August 03, 2017	<b>Shahpur, District Bhojpur, Bihar:</b> Three men were badly beaten by the group of alleged	

		Bajrang Dal activist on the suspicion of transporting cow meat in a truck on National Highway No. 84, which indicates that lynching and mob violence entered Bihar as soon as BJP came to power in the state.	
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18. Above incidents shows the pathetic condition of the state where these cow vigilantes can unleash mob justice upon people in the name of cow protection where the state is quite reluctant in taking action against them. The photographs of the incident of mob mynching and its victims are at Annexure – P1. All the hate speeches by various leaders have been annexed in audio-video CD format which is hereby annexed as Annexure – P2 whereas the incidents are in CD format at Annexure – P3.
19. There has been a rapid growth in cow protection related violence since May, 2014. The prime Minister has denounced the violence. The violence has included notable killings, such as the lynchings at Dadri, Jharkand, Alwar and other parts of the country. Human Rights Watch has also reported many incidents of assault, harassmnet and extortion. According to a Reuters report, a total of “28 Indians – 24 of them Muslims – have been killed and 124 injured”, between 2010 and June 2017 in cow-related violence but number of killings is much more as per our research which is mentioned in the chart below.

20. Since, May 2014, extremist Hindu groups have led vigilante mob attacks across the country to enforce "Nationalism." Senior ruling party leaders, including elected officials and leaders of various groups who claim to promote Hindu rights, have instigated hate crimes. Self-appointed cow protectors are increasingly conducting raids and attacks, claiming the police don't take adequate action against those slaughtering cows. There have been numerous incidents in which they have allegedly assaulted, harassed, threatened, and extorted money from Muslims and Dalits. Dalits, so-called "untouchables," are equally vulnerable as they traditionally carry out jobs to dispose of cattle carcasses and skin them for commercial purposes.
  
21. Among the largest cow protection networks is the Bharatiya Gau Raksha Dal (India Cow Protection Group), an umbrella organization registered in 2012. As per Human Rights Watch report the network is affiliated with about 50 groups across the country and that their 10,000 volunteers have a presence in nearly every state. According to published reports, many of them quoted above, lynching has become a part of their strategy to punish or to terrorize the so-called perpetrators of cow slaughter crime.

22. Lynching is an extrajudicial punishment by an informal group. It is most often used to characterize informal public executions by a mob in order to punish an alleged transgressor, or to intimidate a group. In the last few years, cow vigilantism has been the catalyst of violence across India. The self-styled gaurakshaks have lynched people, snatched away cows and sparked a fear among a section of the population even without the sanction from the ruling parties and authorities.

23. The incidents of lynching are a part of organized hate campaigns against the Muslims, as per Al-Jazeera article by Professor Apoorvanand of the Delhi University, dated: 6.07.17 titled "What is behind India's epidemic of mob lynching?". The relevant extracts of the article is as under:

"..But these cases would not have been so frequent if it weren't for the atmosphere of hate and suspicion against Muslims, created through a sustained political campaign. Engaging in "meat politics" and calling for cow protection has been a favourite tool for many Hindu nationalist politicians... These groups encourage various hateful beliefs about Muslims: that they are "cow eaters", a threat to Hindu women, and members of terror sleeper cells. They spread ludicrous fears that the Muslim population is growing and will outnumber Hindus in India. This atmosphere of sustained hatred against Muslims makes

attacks on them seem spontaneous and the product of mob anger. But few question why the mob is angry in the first place...”

24. The relevant extracts of the “South Asia State of Minorities Report 2016” dated October 2016 are as under:

“Sometimes specific laws facilitate violence against minorities, especially by non-state vigilante groups acting in connivance with a biased police and law enforcement. All states, barring a few (West Bengal, Kerala and select North – Eastern states) have laws banning cow slaughter and its transportation (Uttar Pradesh- The Prevention of cow slaughter Act 1955 and Bihar the Preservation and improvement of Animals Act 1955) with varying attribution of crime and associated penalties. But the presence of the laws provides a ready tool for a communalised police force to target mostly the poor Muslim transporter workers, resulting in arrests and incarceration of many for long periods of time without even the prospect of bail. Incidents of hate speeches have been common”.

25. The BBC report titled “A Night Patrol’s with India’s Cow Protection Vigilantes” dated 29.10.15 is as under :

“In the neighbouring Alwar town, the local BJP lawmaker Gyan Dev Ahuja makes no bones about his support for the vigilantes."I give them money, I give them support, I



hold classes on the virtues of cow," he tells me. A sample of his lessons: California is entirely electrified by cow dung fuel or biogas, cow milk contains traces of gold; and foreign experts say killing cows in India will "lead to volcanoes, earthquakes and drought." "Still," he sighs, "the cow is not being given enough importance in India. That is why I support the vigilantes. They have a mission. It's about saving India's soul. It's about Hindutva (Hinduness)."

26. The relevant extracts of the Human Rights Watch article "India: 'Cow Protection' Spurs Vigilante Violence" are as under:

"The mild admonitions from BJP leaders when Muslims and Dalits are lynched over cows sends a message that the BJP supports this violence. Even as BJP leaders failed to condemn attacks on Muslims and other minorities, they have announced new policies for cow welfare and made strong statements about the need to protect cows. Their policies and statements have facilitated abuses by cow protection groups in BJP-ruled states of Rajasthan, Haryana, Uttar Pradesh, Jharkhand, Gujarat, Madhya Pradesh, and Chhattisgarh".

27. The relevant extracts of the Joint submission of India , UN country team (UNCT) for the Universal Periodic Review of India 3<sup>rd</sup> Cycle 27<sup>th</sup> Session, April-May 2017 :

“Part 5- Religious Minorities Rights

Point no. 35 - Incidents of religious minorities being targeted during riots, such as in Muzzafarnagar, particularly during times preceding elections need to be addressed. Following incidents of violence arising out of allegations of cow slaughter, the Prime Minister in a statement, condemned these activities for trying to “poison social harmony.”

28. The article from the Caravan Journal titled as “In the Name of the Mother” dated: 1.09.2016 reveals the devastating style of functioning of these vigilante groups. The report is enclosed as Annexure – P . The relevant extracts from the article are as under:

“On 5 August, Times Now broadcasted a sting operation, showing interviews with five top leaders of the Vishva Hindu Parishad and the Bajrang Dal—both prominent factions of the Sangh Parivar. The footage showed the leaders admitting, and at times gloating over, the fact that their organisations fostered such vigilantism among their ranks, and that the Gau Rakshak Dal had the full support of the BJP government and the RSS. According to the report, apart from introducing tougher laws against cow

slaughter in 2011, the Modi government increased the annual grant to the Gauseva and Gauchar Vikas Board—a state-run organisation whose main objectives are “to coordinate with groups involved in preventing slaughter of cow and progeny” and to ensure “effective implementation of cow protection laws”—from Rs 1.5 crore to Rs 150 crore. Moreover, between 2011 and 2014, the State Government disbursed Rs. 75 lakh in cash rewards to 1,394 gau rakshaks. It went on to say that “to provide further motivation to the cow protection volunteers, Rs.3.75 lakh was given to the ‘top performers,’ which included recipients of the biennial Best Cow Protector award. A couple of days later, Surinder added me to a WhatsApp group called “Gau Bhagat. On 2 June, I skimmed through 500-odd messages on it. They mostly contained details about rallies, orders, patrols and achievements, apart from sundry jokes and nationalistic propaganda, with dubious arguments and statistics. There were also images, videos and songs hailing the cow mother. Most of the messages ended with “Jai Gau Mata Ki.” A few weeks thence, Surinder changed the name of the group to “Gau ma da ladlaa,” or beloved son of the cow mother. Recently, on 9 August, reacting to the Prime

minister's comments against gau rakshaks, one of the members posted a poem in Hindi:

"Ek arab ki umeedon ne tumko vahaan bithaaya  
tha Saare desh ke gau bhakton ne, milkar jor  
lagaya tha Abhi samay hai, maafi maang lo,  
varna desh ki gaddi se ab tumhein utaara  
jaayega, Patna toh tum haar chuke, ab UP haara  
jaayega"

29. The recent lynching of Junaid shocked the world where he was brutally killed. The relevant extracts of the fact finding report by 'Human Rights Law Network' into the Ballabgarh lynching incident dated 22.6.17 are as under:

"Someone from the crowd snatched Hashim`s skull cap, threw it on the floor and crushed it with his feet. After this they caught Hashim`s beard. They tried to stop them, they started beating them all. They started shouting, "Katalla hain! Maaro Maaro! Daadi rakhte hain! Gaddar hain, they are Muslims, anti-nationals and beef eaters. When asked about the role of passengers in the train, she said the other people in that coach also almost joined the attackers. Since Junaid was fasting, his brother Hashim asked for water from the crowd to break the fast but nobody offered him water. When Hashim asked a lady for a dupatta to cover his wounds, she refuted."

30. Dadri's Akhlaq lynching was one of the most infamous cases of this lynching series. The relevant extracts of the fact finding report by 'Human Rights Law Network' into the Dadri lynching incident dated 28.9.15 are as under:

"The calf was reportedly missing since 16<sup>th</sup>September(12 days before the incident) if this would be a serious issue and in the backdrop of upcoming Bakrid on 25th September, it would have become a serious communal issue much before the day incident took place which didn't happen. Hence the "missing calf and beef theory" is being portrayed to give communal colour to the incident and try to save culprits of lynching Akhlaq."

31. The relevant extracts of the fact finding report by 'Human Rights Law Network' into the Ayub lynching death case , Ahmedabad by Gau Rakshak mob dated 13.09.2016 are as under:

"When Ayub and Sameer Shaikh were in an Innova car towards Ahmedabad with two calves, the gau rakshak mob chased them all of a sudden. It was reported that they pulled them out of the car and thrashed them up. The group rammed into their car near Honest T-junction near Karnavati club in Ahmedabad, pulled them out of the car and beat them up."

32. In continuance of their ugly vigilantism and selective attacks on minorities and dalits. The cow vigilante groups targeted the dalits involved in skinning a cow carcass for leather industry. They mercilessly beat and paraded the four victims, and flogged them publicly all the way to the police station. The relevant extracts of the fact finding report by 'Human Rights Law Network' into the Una Dalit lynching incident dated 11.07.2016 are as under:

"I told them that the cow was dead and that we were merely removing its skin. But they started abusing us and attacked us with iron pipes, sticks and a knife with which we were removing the skin of the carcass, Vashram said in his complaint. The purported video of the victims was circulated on social media..."

33. Article 48 of the Constitution of India mandates the state to prohibit the slaughter of cows and calves and other milch and draught cattle. On October 26, 2005, the Supreme Court of India, in a landmark judgment upheld the constitutional validity of anti-cow laws 24 out of 29 states in India currently have various Kerala, West Bengal, Arunachal Pradesh, Mizoram, Meghalaya, Nagaland, Tripura and Sikkim are the states where there are no restrictions on cow slaughter.

34. The laws governing cattle slaughter in India vary greatly from state to state. The "Preservation, protection and improvement of stock and prevention of animal diseases, veterinary training and

practice" is Entry 15 of the State List of the Seventh Schedule of the Constitution, meaning that State legislatures have exclusive powers to legislate the prevention of slaughter and preservation of cattle. Some States allow the slaughter of cattle with restrictions like a "fit-for-slaughter" certificate which may be issued depending on factors like age and gender of cattle, continued economic viability etc. Others completely ban cattle slaughter, while there is no restriction in a few states. On 26 May 2017, vide its notification the Ministry of Environment of Indian Central Government imposed a ban on the sale and purchase of cattle for slaughter at animal markets across India, under Prevention of Cruelty to Animals statutes, which has been stayed by the Hon'ble Supreme Court of India.

35. There seems to be a new wave of terrorism unleashed by the mobs of self-proclaimed *Gau Rakshak* (cow vigilantes) across the country. They identify the religion or caste first and look for the reason later. They kill first and count the victims later. They don't fear the law; they threaten authority at their will and remain confident to target people again.

**Situation now:**

36. Since 2014 with the coming to power of the present regime the extremist Hindu groups have led attacks across the country that has targeted Muslim and Dalit communities. These attacks have been carried out with the stated intention of protecting cows. Dalit

groups and Muslims are particularly vulnerable to such attacks, as they are frequently responsible for disposing cattle carcasses and skins. The perpetrators of these attacks, described as "vigilantism" by Human Rights Watch, have stated that they are protecting the rights of Hindus, and that the police do not adequately deal with cow slaughter. Scholar Radha Sarkar has argued that "cow vigilantism itself is not new in India, and violence over the protection of cows has occurred in the past. However, the frequency, impunity, and flagrance of the current instances of cow-related violence are unprecedented."

37. In 2015 Business Insider reported that vigilante attacks on trucks carrying cattle had increased in Maharashtra. In 2017, Bloomberg reported that according to the meat industry representatives, cow vigilantes have been stopping vehicles, extorting money and stealing valuable livestock.
38. Cow vigilante activity also increased during the run up to Bihar Legislative Assembly election, 2015. BJP leader Sushil Kumar Modi said the election was "a fight between those who eat beef and those who are against cow slaughter".
39. *The Economist* argues that cow vigilantism can sometimes be a profitable business. It pointed to an *Indian Express* investigation that found that vigilantes in Punjab charge cattle transporters 200 rupees (\$3) per cow in exchange for not harassing their trucks.



40. Many Indian states have been passing stricter laws. For example, in March 2015, Maharashtra passed stricter legislation with regards to cow slaughter. Cow vigilantes have also been emboldened by these laws, and attack Muslims suspected of smuggling cattle for slaughter.
41. Some Indian states have been accused of having laws that enable cow protection groups. In April 2017 the Supreme Court asked the governments of six states: Rajasthan, Maharashtra, Gujarat, Jharkhand, Karnataka and Uttar Pradesh; to respond to a plea asking for a ban against cow-protection related vigilantism, due to the violence perpetrated by these groups.
42. Many vigilantes believe their actions are approved by the government and Hindus of the country. For example, the vigilante group "Gau Rakshak Dal", formed in Haryana in 2012, believe it is acting on government mandate. The bans on beef "tacitly legitimize vigilante activity." Cow protection groups formed in Haryana in 2012 see themselves to now be "acting upon the mandate of the government." Such groups across the country have "[taken] it upon themselves to punish those they believe to be harming the cow." Such incidents of violence have occurred even in situations in which no illegal actions have occurred, such as in the handling of dead cattle. According to Sarkar, cow protection

groups have taken actions that they know to be illegal, because they believe that they have the support of the government.

43. In November 2016, the BJP-led Haryana government has decided to provide ID cards for cow vigilantes. However they were not issued despite collecting the details of vigilantes. Further the State of Gujarat passed a law making the slaughter of cows punishable with life imprisonment. But these laws are silent on the processes for carrying out legal business in livestock, of activities not banned by the law. Licensing systems and permits for buying and transporting cattle for dairying, livestock and animal husbandy etc., among others, are not accessible for those wanting to undertake these businesses legally, and there is little effort by the states, to make rules around these user friendly, and create awareness about how to obtain licenses and permits.
44. According to Human Rights Watch, many cow protection vigilante groups are allied with the BJP. According to BBC News, many cow-protection vigilantes attend training camps organized by Rashtriya Swayam Sevak Sangh, which is BJP's parent organization. It is reported in '*The Telegraph*' that BJP officials of justifying vigilantism and try to pressurize the police to charge the victims (or their family) for provoking the assault after the vigilante attacks.
45. The record suggests that in UP alone, since Modi government came to power at centre in May 2014, and until the end of 2015,

over 330 instances of communal tension over the alleged cow slaughter took place. The figure rose to extreme limit as of now. The Human Rights Watch report says that the attacks against Muslims and Dalits (formerly known as untouchables) have risen over rumors that they sold, bought or killed cows for beef.

46. The list of annexure in chronological order are as under:

1. The copy of the Photographs of lynching incidents across the country is hereby annexed as **Annexure – P1.**
2. The true copy of the Audio-Video representation in form of CD of the hate speeches and instigations as stated by the different political and spiritual leaders is hereby annexed as **Annexure – P2.**
3. The true copy of Audio-video representation in the form of CD of the lynching incidents across the country is hereby annexed as **Annexure – P3.**
4. The true copy of the media report dated 4.06.2014 published in The Indian Express titled "Muslim techie beaten to death in Pune, 7 men of Hindu outfit held "is hereby annexed as **Annexure – P4.**
5. The true copy of the Media article dated 1.10.2015 published in BBC titled "Why India man was lynched over beef rumours." is hereby annexed as **Annexure – P5.**

6. The true copy of the Media article dated 16.10.2015 published in BBC titled "Why India man lynched over beef rumours" is hereby annexed as **Annexure – P6.**
7. The true copy of the media report dated 19.10.2015 published in The Hindu titled "Tension in Kashmir after trucker dies" is hereby annexed as **Annexure – P7.**
8. The true copy of the news report dated 1.11.2015 published in The Hindu titled "Accused in lynching of man in Rajasthan still remains free" is hereby annexed as **Annexure – P8.**
9. The true copy of the Media report dated 6.11.2015 published in Kashmir Times titled "Kashmir is sitting on powder keg again" is hereby annexed as **Annexure – P9.**
10. The true copy of the news report dated 22.11.2015 published in Times of India titled "Stringent punishment for cow slaughter, eating beef , Haryana CM Manihar Lal Khattar says" is hereby annexed as **Annexure – P10.**
11. The true copy of the Media report dated 15.01.2016 published in The Indian Express titled "A Muslim couple on train beaten in MP over beef suspicion." is hereby annexed as **Annexure – P11.**
12. The true copy of the media report dated 5.03.2016

published in the Wire .com titled as "Former Judges, Jurists urge Supreme Court to Act against Hate Speech." is hereby annexed as **Annexure – P12.**

13. The true copy of the Media report dated 21.03.2016 published in Indian Express titled "Two cattle traders hanged from tree, Gau raksha activist among 5 held ." is hereby annexed as **Annexure – P13.**

14. The Fact Finding Report on Balumath, Jharkhand conducted by Human Rights Law Network dated 27.03.2016 is hereby annexed as **Annexure – P14.**

15. The true copy of a Report titled "Religious Tolerance is deteriorating in India "by the US Commission on International Religious Freedom dated: May, 2016 is hereby annexed as **Annexure – P15.**

16. The true copy of the media report dated 1.06.2016 published in Times of India titled "Its beef, says report but sample not from Akhlaq house." is hereby annexed as **Annexure – P16.**

17. The true copy of the media report dated 28.06.2016 published in India.com titled "Muslim beef transporters beaten, forced to eat cow dung by Gau Rakshak Dal" is hereby annexed as **Annexure – P17.**

18. The true copy of the Media report dated 9.07.2016 published in The Indian Express titled "Dalit lynched by upper caste mob in Gujarat "is hereby annexed as **Annexure – P18.**
19. The true copy of the media report dated 13.07.2016 published in the Times of India titled "4 Dalits stripped, beaten up for skinning dead cow." is hereby annexed as **Annexure – P19.**
20. The true copy of the media report dated 14.07.2016 published in NDTV.com titled "In Dadri lynching case, victim Mohd Akhlaqs mother is hereby annexed as **Annexure-P20.**
21. The Fact Finding Report on Una, Gujarat lynching matter conducted by Human Rights Law Network dated 23.07.2016 is hereby annexed as **Annexure – P21.**
22. The true copy of the Media report dated: 27.07.2016 published in the Indian Express titled "Cow was killed by lion, not Dalit men flogged by gau Rakshak "is hereby annexed as **Annexure – P22.**
23. The true copy of the media report dated 28.07.2016 published in the Times of India titled " Its beef says report , but sample not from akhlaqs house ." is hereby annexed as **Annexure – P23**

24. The true copy of the media report dated 28.07.2016 published in Indian Express titled "Karnataka cow slaughter: Bajrang Dal men attacked Dalit house before calling cops, says probe." is hereby annexed as **Annexure – P24.**
25. The true copy of the news report dated 28.07.2016 published in India Today titled "Muslim women beaten over suspicion of carrying beef in Madhya Pradesh ." is hereby annexed as **Annexure – P25.**
26. The true copy of the media report dated 29.07.2016 published in India Today titled "Bajrang Dal behind attack on Muslim women over buffalo meat in Mandsaur" is hereby annexed as **Annexure – P26**
27. The true copy of the media report dated 13.08.2016 published in Press Trust of India titled "Modi's Remarks Against 'Gaurakshaks' an Insult: Praveen Togadia. " is hereby annexed as **Annexure – P27.**
28. The true copy of the news report dated 18.08.2016 published in Hindustan Times titled "Cow vigilantes kill BJP worker carrying cattle in vehicle" is hereby annexed as **Annexure – P28**
29. The true copy of the media report dated: 18.08.2016 published in India Today is hereby annexed as **Annexure – P29.**

30. The true copy of an Article dated: 1.09.2016 published in Caravan magazine titled "In the name of mother" is hereby annexed as **Annexure – P30.**
31. The true copy of the media report dated 11.09.2016 published in India Today is hereby annexed as **Annexure – P31.**
32. The true copy of the media report dated 17.09.2016 published in Indian Express titled "Man 'carrying calves' in car dies after accident and assault in Gujarat" is hereby annexed as **Annexure – P32.**
33. The Fact Finding Report on Ahmedabad, Gujarat lynching matter conducted by Human Rights Law Network dated 24.09.2016 is hereby annexed as **Annexure – P33.**
34. The Fact Finding Report on Dadri, Haryana lynching matter conducted by Human Rights Law Network dated 2.10.2016 is hereby annexed as **Annexure – P34.**
35. The true copy of the media report dated 7.10.2016 published in The Hindu titled "Hurt to see tricolour on coffin of Akhlaqs killer, says family." is hereby annexed as **Annexure – P35.**
36. The true copy of the Media report dated 12.10.2016 published in First post.com titled "Ranchi 22 year old arrested



over objectionable whats app message dies in police custody." is hereby annexed as **Annexure – 36.**

37. The true copy of a Report dated 3.11.2016 published by South Asia State Minorities Report 2016, Chapter 3 titled "Is the idea unravelling." is hereby annexed as **Annexure – P37.**

38. The Fact Finding Report on Alwar, Rajasthan lynching matter conducted by Human Rights Law Network dated 8.04.2017 is hereby annexed as **Annexure – P38.**

39. The true copy of the media report dated 24.01.2017 published in First Post.com titled " Ranchi: 22-year-old arrested over 'objectionable' Whatsapp message dies in police custody" is hereby annexed as **Annexure – P39.**

40. The true copy of the media report dated 10.03.2017 published in the Times of India titled "Bangla guard lynched in Tripura." is hereby annexed as **Annexure – P40.**

41. The true copy of the media report dated 22.3.2017 published in the Indian Express titled "Beef rumours: Dadri averted, police watched mob beat us, say Jaipur hotel owner, manager." is hereby annexed as **Annexure – P41.**

42. The Fact Finding Report on Jaipur, Rajasthan lynching

matter conducted by Human Rights Law Network dated 22.03.2017 is hereby annexed as **Annexure – P42.**

43. The true copy of the media report dated 16.04.2017 published in Hindustan Times titled "Tension in Muzaffarpur village after lynching of man for hitting goat." is hereby annexed as **Annexure – P43.**

44. The true copy of the media report dated 16.04.2017 published in the New York Times titled "Anatomy of lynching" is hereby annexed as **Annexure – P44.**

45. The true copy of the media report dated 22.04.2017 published in the Times of India titled "Cow vigilantism in J&K: 9-year-old girl attacked; four accused arrested." is hereby annexed as **Annexure – P45.**

46. The true copy of a Human Rights Watch Report dated 27.04.2017 titled "India: Cow protection spurs vigilante violence" is hereby annexed as **Annexure – P46.**

47. The true copy of the media report dated 28.04.2017 published in Indian Express titled "PFA man arrested for leading Kalkaji assault on men transporting buffaloes." is hereby annexed as **Annexure – P47.**

48. The true copy of the media report dated 30.04.2017 published in Hindustan Times titled "Mob lynches two suspected cow thieves in Assam." is hereby annexed as **Annexure – P48.**

49. The true copy of the media report dated 30.04.2017 published in India Times titled "Bihar Man Blinded In One Eye After He Was Attacked For Honking At A Cow Roaming On The Highway." is hereby annexed as **Annexure – P49.**

50. The true copy of the media report dated: 03.05.2017 published in Times of India titled "Months after murder Pehlus killer fall free." is hereby annexed as **Annexure – P50.**

51. The Fact Finding Report on Nagaon, Assam lynching matter conducted by Human Rights Law Network dated 06.05.2017 is hereby annexed as **Annexure – P51.**

52. The true copy of the media report dated 20.05. 2017 published in the Indian Express titled "Seven lynched by mob in Jharkhand over the kidnap rumours." is hereby annexed as **Annexure – P52.**

53. The true copy of the media report dated 22.05. 2017 published in the Hindustan Times titled "Mob lynches men in Jamshedpur, thrashes grandmother who tried to save them." is hereby annexed as **Annexure – P53.**

54. The true copy of the media report dated 28.05.2017 published in India Today titled "Cow vigilantes attack two youths for allegedly possessing beef in Washim district." is hereby annexed as **Annexure – P54.**

55. The true copy of the media report dated 29.05.2017 published in Indian Express titled "Cow vigilantes thrash meat traders on suspicion of possessing beef." is hereby annexed as **Annexure – P55.**
56. The true copy of the media report dated 30.05.2017 published in The Hindu titled "IIT Madras scholar beaten up for beef eating." is hereby annexed as **Annexure – P56.**
57. The true copy of the media report dated 30.05.2017 published in Hindustan Times titled "Mob lynches Muslim man in UP's Bulandshahar, son blames Hindu Yuva Vahini" , is hereby annexed as **Annexure – P57.**
58. The true copy of the media report dated 5.06.2017 published in Kashmir Times titled "India: Who 'loves' Mob Violence? Unfolding Hindu Rashtra in Slow Motion", is hereby annexed as **Annexure – P58.**
59. The true copy of the media report dated 13.06.2017 published in India Times titled "Gau Rakshaks In Rajasthan Thrash Tamil Nadu Govt Staff transporting Cows For Breeding", is hereby annexed as **Annexure – P59.**
60. The true copy of the media report dated 23.06.2017 published in Indian Express , titled "DSP Mohammad Ayub lynched outside Kashmir's Jamia Masjid: What has happened so far" is hereby annexed as **Annexure – P60.**

61. The true copy of the media report dated 25.06.2017 published in Indian Express titled "Faridabad lynching :acted promptly was not informed on time says Government Railway police" , is hereby annexed as **Annexure – P61.**
62. The true copy of the media report dated 26.06.2017 published in The Hindu titled "Junaid murder: Gloom descends on Khandawli ", is hereby annexed as **Annexure – P62.**
63. The true copy of the media report dated 26.06.2017 published in Times Now.com titled "Three Muslim youth lynched in West Bengal over suspicion of cow theft", is hereby annexed as **Annexure – P63.**
64. The true copy of the media report dated 26.06.2017 published in The Telegraph titled "Govt breaks silence on lynching" is hereby annexed as **Annexure – P64.**
65. The true copy of the media report dated 26.06.2017 published in The Indian Express titled "Three Muslim youth urgently summoned over phone the night they were killed." is hereby annexed as **Annexure – P65.**
66. The true copy of the media report dated 27.06.2017 published in Indian Express titled "On Eid, fear grips Junaid village: Kuch mat bolo, chup chaap sab sun lo. " is hereby annexed as **Annexure – P66.**

67. The true copy of the media report dated 27.06.2017 published in Indian Express titled "Junaid's murder" is hereby annexed as **Annexure – P67.**

68. The true copy of the media report dated 27.06.2017 published in Hindustan Times titled "Jharkhand mob lynching shows colonial forms of violence flourish in modern India." is hereby annexed as **Annexure – P68.**

69. The true copy of the media report dated 28.6.2017 published in ABP News .com titled "Dairy owner thrashed in Jharkhand, house set ablaze after dead cow found" is hereby annexed as **Annexure – P69.**

70. The true copy of the media report dated 28.06.2017 published in NDTV.com titled "Man Thrashed, House Set On Fire By mob In Jharkhand Over Dead Cow" is hereby annexed as **Annexure – P70.**

71. The true copy of the media report dated 29.06.2017 published in India Today titled "Modi warns gau-rakshaks, man accused of carrying beef killed hours later in Jharkhand" is hereby annexed as **Annexure – P71.**

72. The true copy of the media report dated 30.06 2017 published in Hindustan Times titled "Man accused of carrying beef beaten to death by 100-strong mob in Jharkhand" is hereby annexed as **Annexure – P72.**

73. The true copy of the media report dated 6.7.2017 published in Al-Jazeera titled "What is behind Indias epidemic of mob lynching?" is hereby annexed as **Annexure – P73.**
74. The true copy of the media report dated 7.7.2017 published in Hindustan Times titled "Gau Rakshaks followed Jharkhand trader for hours before lynching him | A blow by blow account by police" is hereby annexed as **Annexure – P74.**
75. The Fact Finding Report on Ramgarh, Jharkhand lynching matter conducted by Human Rights Law Network dated 08.07.2017 is hereby annexed as **Annexure –P75.**
76. The true copy of the media report dated 9.07.2017 published in Hindustan Times titled "Two weeks after Junaid's lynching, no one from his village has boarded a train." is hereby annexed as **Annexure – P76.**
77. The true copy of a report dated 12.07.2017 published in South Asian citizens wire titled "India: In the Name of Cow: Lynching and More Lynching's: Ram Puniyani" is hereby annexed as **Annexure – P77.**
78. The true copy of the media report dated 13.07.2017 published in India Today titled "Mob lynching India's shocking war within, a challenge Narendra Modi must confront" is hereby annexed as **Annexure – P78.**

79. The true copy of the media report dated 13.07.2017 published in The Times of India titled "Family attacked and robbed by group of youths on Shikohabad-Kasganj passenger train is hereby annexed as **Annexure – P79.**
80. The Fact Finding Report on Junaid, Ballabgarh lynching matter conducted by Human Rights Law Network dated 14.07.2017 is hereby annexed as **Annexure –P80.**
81. The Fact Finding Report on Jamshedpur lynching matter conducted by Human Rights Law Network dated 16.07.2017 is hereby annexed as **Annexure –P81.**
82. The true copy of the media report dated 19.07.2017 published in Hindustan Times titled "Alwar lynching: Pehlu Khan, killed by cow vigilante, was no cattle smuggler" is hereby annexed as **Annexure – P82.**
83. The true copy of the media report dated 2.08.2017 published in India Today titled "Jharkhand: Man stripped, thrashed for being in love with women of other religion" is hereby annexed as **Annexure – P83.**
84. The true copy of the report dated 4.08.2017 published in The Hindu titled "Three men were attacked over beef rumours" is hereby annexed as **Annexure – P84.**
85. The true copy of the report dated Nil of August, 2017



published by Public Policy research Centre titled "Is the media selective in covering atrocities on dalits and minorities?" is hereby annexed as **Annexure – P85.**

86. The true copy of a Report prepared by MISAAL, a sister organisation of Petitioner No.2 related to the lynching incidents in the State of Haryana is hereby annexed as **Annexure – P86.**

87. The true copy of a Report prepared by MISAAL, a sister organisation of Petitioner No.2 related to the lynching incidents in the State of Jharkhand is hereby annexed as **Annexure – P87.**

88. The true copy of a Report prepared by MISAAL, a project under Petitioner No.2 related to the lynching incidents in the State of Uttar Pradesh is hereby annexed as **Annexure – P88.**

#### **Grounds:**

The petitioners have preferred the present Writ Petition, inter alia on the following grounds:

- I. Because there is a sudden rise in the incident mob lynching in the name of faith and caste especially in the name of cow or beef eating and there is no control of the administration i.e. union and the states to put a check on these types of violent incidents.

- II. Because there have been numerous incidents in which they have allegedly assaulted, harassed, threatened, and extorted money from Muslims and Dalits. Dalits, so-called "untouchables," are equally vulnerable as they traditionally carry out jobs to dispose of cattle carcasses and skin them for commercial purposes, according to the research work of the petitioners there are 46 reported incidents of lynching in most of the cases the victims were killed due to the brutality of these vigilante groups and 124 injured as per Reuters report, between 2010 and June 2017 in cow-related violence.
- III. Because in a civilised democratic society like ours no individual or any group should be allowed to take law into their hands.
- IV. Because as per Human Rights Watch report the Cow vigilante group network is affiliated with about 50 groups across the country and they have over 10,000 volunteers presence in nearly every state. Lynching has become a part of their strategy to punish or to terrorize the so-called perpetrators of crime.
- V. Because the incidents that have happened are not isolated or unconnected. The conspiracy invariably begins at the top where politically senior persons and senior religious leaders

have instigated their followers to attack and kill Muslims, dalits and beef eaters. Despite having appropriate provisions in law to act against the instigators no action has been taken against them which give them freehand to further spoil the harmonious atmosphere of the country.

- VI. Because the incidents of lynching are a part of organized hate campaign against the minorities and dalits, most cases the allegation of beef eating was fabricated and the hysteria that now surrounds the cow in India has been engineered to gain political mileage.
- VII. Because in any case **“no person has the right to take the law into his own hands”** and execute any other citizen of the country.
- VIII. Because a just-concluded civil society fact finding of cow related lynching violence resulting in deaths and rape (July 2017) shows that legal proceedings in most cases is not satisfactory: in many cases, victims have had cross cases registered against them, in some, those are the only cases registered; elsewhere, police inaction against vigilantes in a case of lynching resulting in death, led to the accused lynching another person to death. Where cases are ongoing against those responsible for mob lynchings, investigations are slow and fraught, and in many cases the accused have

obtained bail, and are now threatening victim families and the witnesses. In the vast majority of cases victim families have not been provided any compensation or other financial recompense.

IX. Because as per various report and investigations it was revealed that these violent cow vigilant groups are being funded by the particular political party and its non political wings. Their policies and statements have facilitated abuses by cow protection groups in BJP-ruled states of Rajasthan, Haryana, Uttar Pradesh, Jharkhand, Gujarat, Madhya Pradesh, Chhattisgarh and others.

X. Because the Caravan Journal titled as "In the Name of the Mother" dated: 1.09.2016 reveals the devastating style of functioning of these vigilante groups. According to the report, the Modi government increased the annual grant to the Gau Seva and Gauchar Vikas Board - a state-run organization whose main objectives are "to coordinate with groups involved in preventing slaughter of cow and progeny" and to ensure "effective implementation of cow protection laws" - from Rs 1.5 crore to Rs 150 crore. Moreover, between 2011 and 2014, the State Government disbursed Rs. 75 lakh in cash rewards to 1,394 gau rakshaks. The disbursement of such heavy amount of money have encourage them to work in autocratic style.

- XI. Because the recent lynching of Junaid during his ride in local train to Ballabgarh where he was brutally killed and two of his brothers seriously injured shocked the world and it was revealed from the testimonies of the injured and eye witnesses that the incident was a clear hate crime against the Muslim. The video of Junaid's body after the postmortem clearly indicates the extent of hate against the community.
- XII. Because the Muslim festival of "Bakr Eid" is approaching in the first week of September 2017, and it is strongly presumed that there may be repetition of number of Dadri-like incidents (Akhlaq lynching case), where innocent persons are attacked by mobs accusing them wrongly of slaughtering cows and consuming beef.
- XIII. Because these vigilante groups infringe the Article 19(1) (g) of the Constitution of India as the Dalits attacked in regard to Una incident were involved in traditional profession of skinning the already dead cow for livelihood. Further, the Traders of livestock who carry valid licenses are also feeling threatened due to multiple attacks.
- XIV. Because the ugly vigilantism and selective attacks on minorities and dalits is also affecting the leather industry badly as they are also targeting the dalits involved in skinning a cow carcass for leather industry, hence effecting the supply of leather in proportion to its demand.

- XV. Because the extremist Hindu groups have led vigilante mob attacks across the country to enforce "Nationalism." Senior ruling party leaders, including elected officials and leaders of various groups who claim to promote Hindu rights, have instigated hate crimes. Self-appointed cow protectors are increasingly conducting raids and attacks, claiming the police don't take adequate action against those slaughtering cows.
- XVI. Because the members of these vigilante groups are so intolerant that when the Prime minister's commented against gau rakshaks and their vandalism and barbarism then these groups even reacted badly against the condemnation of their by the Prime Minister.
- XVII. Because the cow protection group spread the videos of their acts on Social Media thus causing tension between different communities and castes.
- XVIII. Because the said vigilante groups also collect donations from public which are used to perpetrate violence and atrocities on the people belonging to Muslims and Dalits.
- XIX. Because the petitioners seeks the registration of an FIR against the people involved in hate crimes mentioned in the chart prepared by the petitioners, just and proper investigation and prosecution by a SIT consisting of officers from outside the state where the incident has taken place.

Petitioner states that no meaningful action has been taken against the persons.

- XX. Because the petition is far more comprehensive than the earlier petition filed by Martin Macwan filed Writ Petition (C) No. 768 of 2016 seeking certain reliefs in respect of the lynching and assaults. In terms of the coverage of 46 instances as well as numerous instances of instigation by political and religious leaders. Hence it is prayed that this petition may also be admitted and heard along with the abovementioned Writ Petition.
- XXI. Because the Petitioners have not filed any other Petition/Petitions with similar or same reliefs before any Court, including this Hon'ble Court or any other Court.
- XXII. Because this Hon'ble Court has adequate territorial jurisdiction to issue directions, orders and writs given the cause of action in whole and in part arises within the territories in which it exercises jurisdiction.
- XXIII. Because the Petitioners have no other equally efficacious alternative remedy and therefore, the Petitioners are approaching this Hon'ble Court by filing the present petition. The facts warrant interference of this Hon'ble Court under Article 32 of the Constitution of India.

## Prayers

The Petitioners are seeking issuance of writ of mandamus or any other appropriate writ, order or direction of this Hon'ble Court:

- a) For a writ of mandamus or any other appropriate writ, order or direction to the CBI (Respondent No. 38) monitored by this Hon'ble Court to investigate and prosecute in respect of the matters at Serial Nos. 1, 4, 5, 6, 7, 8, 9, 10, 12, 16, 17, 20, 21, 22, 24, 25, 26, 29 and 31 of Chart B at paragraph 16 of this Petition in respect of the 19 instances of vigilantism, lynching, assaults, murder, rape and the like;
- b) For an order directing the CBI to investigate and prosecute in respect of the hate crimes as set out in Chart - A paragraph 11 of the Petition in respect of offences committed, inter alia, under sections 153 A & B, 295 A, 298 & 505 IPC;
- c) For an order directing the concerned states to pay substantial compensation to the victim survivors and their families and to rehabilitate them generously in terms of government employment, land, education, medical treatment and other benefits;
- d) For an order directing the DGPs of all the state governments and the SPs of all districts in India to ensure that no act of vigilantism takes place within their jurisdictions and



particularly to ensure that the holy festival of Bakri Eid passes off peacefully.

- e) To pass any other order which this Hon'ble Court deems fit and appropriate in the matter.

**AND FOR THIS ACT OF KINDNESS, THE PETITIONERS AS IN DUTY BOUND SHALL EVER BE GRATEFUL.**

**Satya Mitra**  
**(Advocate for the Petitioners)**

**Place: New Delhi**

**Drafted by: Advocate Tariq Adeeb**

**Date: 19.08.2017**