

URGENT**Date: October 10, 2025**legal@support.youtube.com

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Sub: Urgent complaint for immediate takedown and channel suspension – incitement to violence, hate speech, anti-Dalit propaganda, and targeted harassment against the Chief Justice of India, Hon'ble Mr. Justice B.R. Gavai

Respected Legal Team at YouTube,

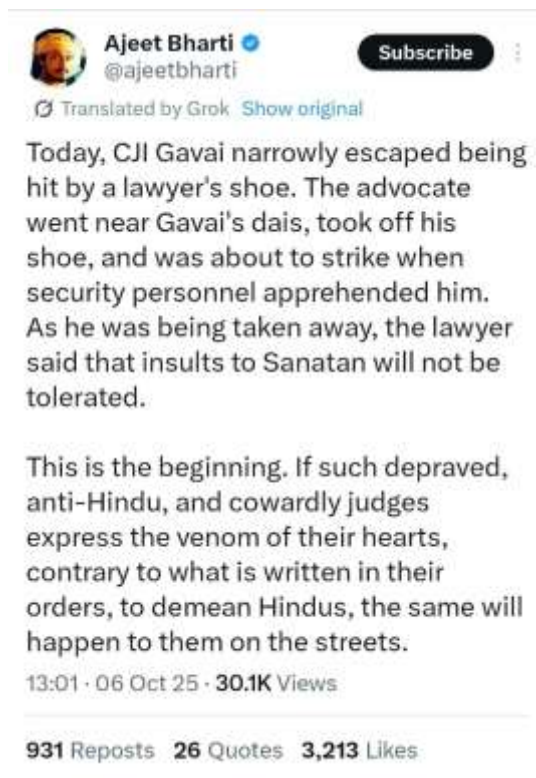
We at Citizens for Justice and Peace (CJP) Mumbai, a human rights movement dedicated to furthering the constitutional rights of all Indians, are compelled to lodge this urgent complaint regarding deeply disturbing content hosted on your platform. This complaint details the dissemination of profoundly offensive and criminal material that constitutes direct incitement to violence, targeted harassment, and virulent discriminatory and casteist hate speech against the serving Chief Justice of India (CJI), Hon'ble Mr. Justice B.R. Gavai.

Factual Background:

The nature of the content articulated herein transcends mere hateful commentary. It represents a direct and calculated assault on the dignity and personal safety of India's highest judicial functionary and, consequently, a grave threat to the independence of the Indian judiciary itself. The creator of these videos, Mr. Ajeet Bharti, is a person with known antecedents of disseminating hateful and divisive statements. His broader social media profile is already under the active surveillance and investigation of Indian law enforcement for similar offenses. Specifically, the Punjab Police have registered First Information Reports (FIRs) against numerous social media handles, prominently naming Mr. Bharti, for broadcasting casteist propaganda targeting CJI B.R. Gavai.

While these official investigations may pertain to different social media posts, they establish an undeniable pattern of malicious behaviour and shows the creator's propensity for generating content that is considered prima facie criminal under Indian law. This context is critical as the videos hosted on your platform are not isolated incidents but are part of a wider, documented campaign of hate by an individual whose activities are already subject to serious legal action by multiple state authorities. This established profile of spreading hate speech adds profound gravity to the content of the videos in this complaint and heightens the urgency for their immediate removal.

Further compounding the urgency of this complaint, on October 7, 2025, Mr. Ajeet Bharti, the creator and primary voice behind the [\[@ajeetbharti\]](#) YouTube channel, was formally questioned by the Noida Police. This questioning specifically pertained to his social media posts containing provocative remarks about a shoe-throwing incident targeting Chief Justice of India B.R. Gavai. While reports indicate he was not arrested but briefly detained for questioning and subsequently released after deleting the offending post, these direct police intervention signifies the criminal culpability recognised by the authorities regarding his content.



The Deleted Post by Ajeet Bharti

The criminal nature of the content in question is not a matter of our interpretation but is confirmed by direct police action. On October 8, 2025, police in the state of Punjab have officially booked the creator of these videos are in question, right-wing influencer Ajeet Bharti, in over a dozen First Information Reports (FIRs).

The official grounds for these criminal proceedings are his “casteist” and “provocative” remarks made on social media targeting Chief Justice of India B.R. Gavai. This explicit and official classification by a state law enforcement agency leaves no ambiguity about the discriminatory and illegal nature of the propaganda Mr. Bharti disseminates.

By continuing to host these videos, YouTube is actively facilitating the spread of content from an individual formally under investigation for caste-based offenses. This makes your platform a party to acts that threaten public order and the sanctity of judicial institutions, demanding your immediate and decisive intervention.

Detailed legal examination of the impugned videos:

This section meticulously examines the transcripts of both videos, providing explicit evidence of how they transgress YouTube's Community Guidelines and various Indian laws. The content herein is presented for the sake of unambiguity and to establish a clear cause of action.

FIRST VIDEO:

Date	Description
29.09.2025	Title: S2E2: CJI Gavai Vs Sleeping Hindus Sonam Wangchuk A Deep State Project Kaushlesh, Anupam, Ajeet
	YouTube Link: https://youtu.be/FoL8q6M7fIU?si=GCiPFTQGr4chSOnc

CJP has very carefully examined the transcript of this podcast, premiered on September 29, 2025, from the Ajeet Bharti's YouTube channel [[@ajeetbharti](#)]. Below are the portions of the discussion that include statements about CJI B.R. Gavai, along with their relevant timestamps and context, unequivocally establishing grounds for immediate action:

The discussion begins with a general statement about lawyers trying to please the judges, then quickly shifts to targeting CJI Gavai:

"This Gavai, you know, he is very scared of social media. Not just today, but ever since he took charge, saying, 'They should be dealt with an iron hand.' Go on, bring out your iron hand, we want to see what an iron hand looks like. We too will bring a diamond hand, a platinum hand." [00:00:16]

This statement, while seemingly challenging, initiates a campaign of threat laced with violence, intimidation, public defiance and ridicule against the Chief Justice. It attempts to portray the CJI as fearful and weak, setting a disparaging tone that weakens the respect for his office. This is the foundational remark that paves the way for further aggressive and violent remarks.

Later, a participant suggests actions against CJI Gavai for his comments on the Hindu deity Vishnu:

"Otherwise, if Mr. Gavai knew that if I comment on the faith in Lord Vishnu, someone would spit on my face the moment I step out... What is the punishment in the IPC for spitting on Gavai's face? Hindus can't even do that." [00:00:40]

This comment directly instigates a form of public humiliation and assault (spitting on the face) against the CJI. By questioning the "punishment in the IPC for spitting on Gavai's face," the speaker explicitly invites contemplation of illegal acts and expresses frustration at the perceived inability of "Hindus" to engage in such acts without consequence. This clearly incites an act of public degradation and prepares the audience for more extreme forms of violence.

Following this, there is an explicit, unequivocal, and shocking incitement of extreme violence against CJI Gavai:

"But I am a complete Gandhian, I don't support violence at all. If I did, I would say that if Gavai ji bumps into someone somewhere, there must be Hindu lawyers in the court where he works, one Hindu lawyer should grab Gavai ji's head and smash it against the wall with such force that it breaks into two pieces." [00:06:42]

This is the most egregious statement in the video. It is a clear incitement to provoke and cause serious injury and harm. These words, on YouTube, constituting a direct, unequivocal, and explicit incitement to commit grievous bodily harm, potentially even leading to a killing, of the Chief Justice of India. The preceding disclaimer of being a "complete Gandhian" is hypocritical and simply a cloak to evade accountability for what is a clear call for extreme physical violence.

This statement is a direct breach of YouTube's Incitement to Violence Policy and Indian penal provisions related to criminal intimidation, incitement to violence, and possibly attempt to murder. The specificity of the act ("smash it against the wall with such force that it breaks into two pieces") leaves no room for ambiguous interpretation.

The conversation further alleges that the judiciary, including CJI Gavai, holds Hindu deities in lower regard than Allah, based on past judgments:

"That same judiciary has the audacity to comment on Lord Vishnu. This either means it considers Lord Vishnu inferior to Allah..." [00:08:04]

This statement attempts to cast the CJI and the judiciary as biased against one religion and favouring another, thereby creating religious discord and undermining public trust in a secular institution. This aligns with YouTube's Hate Speech Policy concerning religious groups and provisions of the Bharatiya Nyaya Sanhita, 2023 (BNS) related to promoting enmity between different groups on grounds of religion.

A suggestion is made to send images of Hindu deities to CJI Gavai's residence as a form of protest, followed by a provocative statement about his perceived reaction:

"Mr. Gavai's home address must be available. Images of Lord Vishnu should be sent to his house. Yes, absolutely. Roses were sent in 'Munna Bhai M.B.B.S.,' he showed a Gandhian way. Nowadays, they have another habit. They won't write comments in the judgment, but they will comment extensively. If you have the guts, write what you are saying in the judgment, then we will see what to do. He's a coward, isn't he? It's like saying, 'Thank you, sir, for showing us our impotence by making such remarks on our gods and then going off to enjoy your Diwali vacation, and then the winter vacation is coming, and you'll become Santa Claus for Christmas.'" [00:36:44]

This segment encourages organised harassment (doxing and sending materials to a private residence) against the CJI, which falls under YouTube's Harassment and Cyberbullying Policy. The language "He's a coward, isn't he?" is deliberately demeaning and aims to ridicule the CJI, further inciting contempt. The sarcasm about "showing us our impotence" and "going off to enjoy your Diwali vacation" trivialises serious judicial work and fuels public resentment.

The speakers then question the impartiality and integrity of the judiciary, including CJI Gavai, suggesting they are "compromised":

"When this kind of thing happens, we feel you are compromised. And you should be told so, but unfortunately, who will bell the cat? The lawyers in front of him are busy licking his boots, saying, 'No, Mr. Gavai, we have known you for 10 years, you are someone who goes to the temple.' The amount of inherent inferiority I have seen in Gavai, damn it, you have reached the topmost post, and you still have it." [00:21:17]

The accusation of being "compromised" directly attacks the integrity and impartiality of the CJI and the judiciary. This is highly defamatory and contemptuous of court. The statement, "The amount of inherent inferiority I have seen in Gavai, damn it, you have reached the topmost post, and you still have it," is a deeply personal and casteist attack. It suggests that despite reaching the highest judicial office, the CJI carries an "inherent inferiority," a phrase often weaponised to denigrate individuals from Scheduled Castes, implying they are inherently lesser regardless of their achievements. This is a direct violation of YouTube's Hate Speech Policy against caste-based discrimination and constitutes criminal defamation.

The discussion further includes accusations of CJI Gavai making light of serious issues and displaying a bias against Hindu sentiments:

"He was smiling there. That 'Guddu Pandit' fellow, that twerp, said something about Ambedkar's 72 degrees, and he was sitting there, thoroughly enjoying it, laughing. Yes, he was laughing somewhere. That same nest-like, rag-like turban on his head, damn it, and saying anything like '72 degrees.' No, we should corner them on their own pitch." [00:23:18]

This snippet deploys highly offensive and derogatory language ("Guddu Pandit," "twerp," "nest-like, rag-like turban") to mock and insult the CJI and others. This constitutes severe harassment and cyberbullying. The reference to "Ambedkar's 72 degrees" is a thinly veiled casteist slur, attempting to discredit the CJI's intellectual capabilities or background based on his perceived association with Dr. B.R. Ambedkar, a revered figure for Dalits. This is a direct attack on his identity and competence rooted in caste prejudice.

The video also contains calls for direct action against judges:

"Until they are surrounded on the streets, until their accountability is fixed, because the government has become impotent in this matter. In this matter, it is either impotent, or there is some strategy. So far, we only see impotence, maybe some masterstroke will emerge later." [00:35:19]

"We are followers of Gandhi, we are not talking about killing. We are just saying, at least spit on him. Yes, at least ask. Yes, I mean, ask them on what basis are you saying these things? Mr. Gavai's home address must be available. Images of Lord Vishnu should be sent to his house. Yes, absolutely. Roses were sent in 'Munna Bhai M.B.B.S.,' he showed a Gandhian way. Nowadays, they have another habit. They won't write comments in the judgment, but they will comment extensively. If you have the guts, write what you are saying in the judgment, then we will see what to do. He's a coward, isn't he? Bouquets from Ferns N Petals should be sent. I will also request all the viewers, I am putting Mr. Gavai's official address on the screen. Send him small idols of Lord Vishnu, send bouquets. 'Get well, Gavai ji.' Petals might be a bit too expensive, just send marigold flowers, plastic flowers. Along with that, I am thinking of sending images of Ravana, Kansa, and Hiranyakashipu as well. Maybe these are the idols in his house because he is not well, his health is not good. Just for 'Get Well Soon,' just send a greeting: 'Thank you, Judge sir, for showing us our impotence by making such remarks on our gods and then going off to enjoy your Diwali vacation, and then the winter vacation is coming, and you'll become Santa Claus for Christmas.' This should happen." [00:36:34]

These segments amplify the calls for public action, ranging from "surrounding" judges on the streets to explicitly organising a hate-mail campaign to his home address, complete with "Mr. Gavai's official address on the screen." This is a clear case of organised harassment, doxing, and incitement to public disorder and intimidation against judicial officers. The sarcastic "Get well, Gavai ji" and comparison to "Ravana, Kansa, and Hiranyakashipu" are further attempts to humiliate and demonise the CJI, equating him with villains in Hindu mythology, thereby exacerbating the hate campaign. This directly violates YouTube's Harassment & Cyberbullying Policy and Incitement to Violence Policy.

SECOND VIDEO:

Date	Description
06.10.2025	Title: Shoe Attack on CJI Gavai: Leftsist Baying For Ajeet Bharti Blood Ajeet Bharti LIVE
	YouTube Link: https://www.youtube.com/live/Z2-5pY55D5I?si=OJ4fj-xDTzpTUIDS

CJP carefully reviewed the entire transcript of this YouTube live session streamed on **October 6, 2025**, from the Ajeet Bharti's YouTube channel [@ajeetbharti]. Below are the relevant portions of the discussion that include offensive, hateful, and abusive statements against CJI B.R. Gavai, with their context and respective timestamps, presented for the sake of unambiguity in this complaint.

The speaker begins the live session by openly expressing his contempt for CJI Gavai's character and judicial integrity, immediately stating his unequivocal support for the person who threw the shoe, framing it as a justified reaction to the CJI's alleged "anti-Hindu" sentiments.

"CJI Gavai is a despicable judge with anti-Hindu sentiment in his heart. Even if someone had hit him with a shoe, I would not have condemned it." [00:00:48]

This statement openly expresses contempt for the CJI and, critically, explicitly endorses an act of violence (shoe-throwing) against him. This is not merely a failure to condemn but an active justification of a criminal act, thus directly inciting violence. This directly violates YouTube's 'Violent or Graphic Content Policy' as the said content is intended to shock or disgust viewers, or content encouraging others to commit violent acts.

The speaker then recounts his own social media post, which he admits could be seen as incitement. He explicitly warns that the assault witnessed in the courtroom could be replicated on the streets if judges continue their alleged behaviour.

"If judges continue to make such anti-Hindu and hate-filled statements, then what happened inside their court today... the same can happen to them on the streets tomorrow." [00:01:30]

This statement is divisive, a direct threat to judicial officers, warning them of future violence ("can happen to them on the streets tomorrow"). It links judicial decisions to physical harm, which is a

clear attempt to intimidate the judiciary and falls under YouTube's Incitement to Violence Policy and Threats Policy.

Criticising CJI Gavai for not explicitly writing his controversial oral remarks in a court order, the speaker uses demeaning terms to describe him as a coward.

"These bastards are such cowards that they don't get the advice they give typed in the order... The Chief Justice of India shouldn't be such a coward (fattu)." [00:05:39]

The use of abusive and derogatory terms like "bastards" and "coward (fattu)" against the Chief Justice of India is a direct act of harassment and defamation. It aims to publicly humiliate and discredit the person holding the highest judicial office, infringing on YouTube's Harassment & Cyberbullying Policy.

The speaker attributes CJI Gavai's actions and statements to an inherent "Ambedkarite" ideology, which he claims fuels hatred against Hindus.

"This hatred is reserved only and only for Hindus, and his father was an Ambedkarite... He is a self-proclaimed Ambedkarite." [00:06:09]

This is a prime example of casteist hate speech. By attributing "hatred" to the CJI's "Ambedkarite" identity (a clear reference to his Dalit background and philosophical leanings), the speaker directly links his caste identity to alleged animosity towards a majority community. This is a deliberate attempt to demonise a protected group based on identity and violates YouTube's Hate Speech Policy specifically regarding caste.

While attacking CJI Gavai for his alleged comments, the speaker directly states that the CJI feels disdain for Hindus, suggesting he should admit it.

"You say that, yes, 'I consider Hindus objects of ridicule'." [00:07:59]

This statement falsely attributes prejudiced views to the CJI, which is defamatory and designed to incite anger and resentment among a large segment of the population against him.

The speaker mocks the CJI's background, calling him a liar for claiming to have grown up in a slum, given his father's political career.

"Your CJI is a liar, falsely claiming he grew up in a slum. His father has been an MLA since he was four years old." [01:04:07]

This is a personal attack aimed at discrediting the CJI's life story and perceived humility. While seemingly factual, it serves to jeopardise his credibility and standing through defamation and targeted harassment.

The speaker further claims that the CJI's actions stem from an "innate hatred" for Hindus, which he believes is constantly present.

"When you make such casual remarks, it is not that casual. It is your inherent hatred; it is the innate hatred that you are carrying." [01:36:04]

This set the narrative of the CJI harboring "innate hatred," further demonising him and fueling a discriminatory narrative based on his identity, aligning with Hate Speech Policy violations.

In a highly derogatory and satirical segment, the speaker combines the CJI's judicial role with offensive caricatures related to his perceived Ambedkarite identity.

"The judge himself doesn't understand the dignity of his post and reaches court in the morning after drinking 'neel' (blue, often associated with Ambedkarite symbolism, used here derisively) and instead of giving orders, starts distributing 'Ambedkar Neel Vachanamrit' (Ambedkar's blue nectar-sermons, implying biased pronouncements)." [01:42:18]

This is a deeply offensive and casteist caricature. The reference to "drinking 'neel'" and "Ambedkar Neel Vachanamrit" is a derogatory and mocking association with Ambedkarite symbolism, implying that the CJI's judicial pronouncements are not based on law but on a biased caste ideology. This directly violates YouTube's Hate Speech Policy and constitutes criminal offense under the SC/ST Act due to its humiliating and caste-based abusive nature.

Continuing the abusive satirical portrayal, the speaker uses degrading and dehumanising language to describe the CJI's personal history and alleged fabrication of identity and struggle.

"He dried the leather of a dead cow in the scorching sun of the slum, smeared it with the blackness of the sewer, and while picking garbage, joined pieces of 'L' and 'V' (referencing Louis Vuitton, mocking his expensive shoes while linking it to a fabricated 'slum' past) to give it this appearance." [01:43:35]

This is an abhorrent and dehumanising casteist slur. It uses traditional derogatory imagery associated with "untouchability" (dead cow leather, sewer, picking garbage) to describe the CJI's background, juxtaposed with mocking references to luxury items ("L and V" for Louis Vuitton) to suggest hypocrisy or a fabricated identity. This is a clear attempt to humiliate, stigmatise, and degrade the CJI based on deeply entrenched caste prejudices. This is a severe violation of YouTube's Hate Speech Policy and a direct offense under the SC/ST Act.

The speaker asserts that the CJI's supposed "Dalit" identity is being falsely used to justify his actions and criticises attempts to claim such an identity while holding a high position.

"As for Dalit, no, brother... if the CJI himself comes one day and says, 'I am Dalit, and this is happening because of it,' then I will believe him... He became a Chief Justice, and he's still a Dalit? His father has been an MLA since he was four years old, and we call ourselves Dalit? What kind of talk is this?" [01:37:19]

This segment directly attacks the CJI's Dalit identity, attempting to invalidate or shame it by implying that a person holding such a high office cannot or should not claim Dalit identity. This is a form of casteist gaslighting and seeks to delegitimise the struggles and achievements of individuals from Scheduled Castes, particularly those who achieve high positions. It questions the very existence of caste discrimination for individuals in power, which is deeply problematic and constitutes hate speech.

While defending his tweet, the speaker reiterates his warning, specifically targeting what he calls "fallen, anti-Hindu, and cowardly judges," and justifying the protest by taking off a shoe.

"With such fallen, anti-Hindu, and cowardly judges, the same will happen on the streets... if they express the toxic sentiments of their hearts to belittle Hindus... I stand by my words that if some judge... keeps giving these kinds of anti-Hindu statements... then he should be opposed in this manner... A protest by taking off a shoe must happen against such people, period." [02:21:48] and [00:44:18]

This is a chilling repetition and reinforcement of the incitement to violence and harassment. By calling judges "fallen, anti-Hindu, and cowardly" and then advocating for specific violent acts ("protest by taking off a shoe must happen"), the speaker directly instigates public disorder and validates criminal behaviour. This is a clear violation of YouTube's Incitement to Violence Policy and directly contributes to a hostile and dangerous environment for judicial officers.

Repercussions of online hate speech: a precursor to real-world violence

The link between inciteful online hate speech & incitement and real-world violence is not a hypothetical concern. In the context of this complaint, it is a matter of demonstrable fact. The content broadcast by Ajeet Bharti on your platform has already had terrifying and tangible consequences, proving that his speech is not mere commentary but a direct catalyst for criminal action.

We present a clear timeline of events:

1. **September 29, 2025:** In the first impugned video, Ajeet Bharti's podcast broadcast a direct, unambiguous, and shocking call for physical violence against the Chief Justice of India. The speaker explicitly urged a specific group—lawyers—to commit a grievous assault, stating: **"one Hindu lawyer should grab Gavai ji's head and smash it against the wall with such force that it breaks into two pieces."**
2. **October 6, 2025:** A mere week after this violent incitement was amplified to thousands of viewers on YouTube, **a lawyer carried out a physical attack on the Chief Justice of India within the precincts of the Supreme Court.**

This sequence of events provides a stark and undeniable correlation between the specific incitement broadcast on your platform and the subsequent act of violence. It proves that the content hosted by YouTube is not harmless demagoguery but a dangerous and effective tool for provoking criminal acts against the highest functionaries of the Indian Republic.

This clear and worrying pattern—where dehumanising speech precedes physical atrocities—has a long and painful history in India, used for decades to target the nation's most vulnerable and marginalised communities. Caste-based slurs, social boycotts, and genocidal pogroms against Dalit and Adivasi communities have consistently been preceded by vicious propaganda campaigns that portray them as less than human and deserving of violence.

While our organisation has extensive first-hand experience documenting how hate writing and pamphlets preceded the anti-Muslim carnage in Gujarat in 2002, the core tactic remains the same. The targets change, but the methodology of vilification leading to violence is a consistent feature of extremist movements. At that time, the mode of communication was limited to pamphlets; now, the same hateful messages are circulated on a much wider, national scale, facilitated and amplified by social media platforms like YouTube.

Suspending a few accounts or deleting some content are measures that are merely small dents on these concerted, wide-ranging, politically driven campaigns. The systemic nature of this online racist, casteist, and misogynist abuse indicates that it is produced and circulated by organised groups, as endorsed by studies from academics like Professor Shakuntala Banaji of the London School of Economics. These creators are aware that even if one handle is banned, it is easy to set

up another anonymous account. The fact that they are able to have such a wide reach despite their content being violative of YouTube's community guidelines means they are able to thrive and mushroom into more and more accounts, creating an ecosystem where violence is normalised and, as proven here, eventually acted upon.

Violation of YouTube's Community Guidelines and Policies:

The content in both videos, meticulously detailed above, flagrantly violates several of YouTube's stated Community Guidelines and Policies. These guidelines are ostensibly designed to foster a safe, respectful, and inclusive environment for all users, prohibiting content that incites hatred, violence, or harassment. The **@ajeetbharti** channel, through these videos, demonstrates a complete disregard for these principles, necessitating robust and immediate action from YouTube.

1. Hate Speech Policy

YouTube's Hate Speech Policy explicitly prohibits content that promotes violence or incites hatred against individuals or groups based on protected attributes such as caste, religion, ethnicity, gender, sexual orientation, disability, or veteran status. The impugned videos are replete with such violations:

- The derogatory remarks and explicit calls for violence targeting CJI B.R. Gavai, particularly the chilling statement to "smash his head against the wall" [00:06:42] in the first video, are clear instances of promoting violence against an individual based on their perceived identity and actions.
- The repeated derogatory and casteist slurs (e.g., linking his actions to "Ambedkarite" ideology and "innate hatred" [00:06:09, 01:36:04], the dehumanising "neel" and "dead cow leather" caricatures [01:42:18, 01:43:35]) are direct attacks based on his caste, inciting hatred and discrimination against the Dalit community. This is a textbook example of hate speech targeting a protected group.
- The efforts to portray the CJI and the judiciary as biased against one religious community and favouring another [00:08:04] also fall under hate speech by attempting to sow religious discord and animosity.

2. Harassment and Cyberbullying Policy

YouTube's Harassment and Cyberbullying Policy strictly prohibit content that aims to maliciously insult, demean, or humiliate an individual, especially through repeated actions or coordinated efforts. Both videos are a sustained campaign of harassment against the CJI:

- The incessant use of demeaning terms such as "coward (fattu)" [00:05:39], "liar" [01:04:07], "despicable judge" [00:00:48], and "twerp" [00:23:18] constitutes severe verbal abuse and personal attacks, clearly violating this policy.
- The organised effort to send harassing materials to the CJI's home address, explicitly calling for his "official address on the screen" [00:36:34], is a flagrant act of doxing and coordinated harassment, designed to intimidate and distress.

- The creation of offensive caricatures, such as those related to his "Ambedkarite" identity and alleged fabricated background [01:42:18, 01:43:35], are highly insulting and dehumanising, further demonstrating a concerted effort to cyberbully.

3. Incitement to Violence Policy

This policy forbids content that encourages others to commit violent acts. The violations in this category are particularly egregious and dangerous:

- The explicit call for "one Hindu lawyer should grab Gavai ji's head and smash it against the wall with such force that it breaks into two pieces" [00:06:42] is a clear, unambiguous, and direct incitement to extreme physical violence, even murder.
- The endorsement of the "shoe attack" and the ominous warning that "what happened inside their court today... the same can happen to them on the streets tomorrow" [00:01:30] are direct threats and justifications for physical assault against judicial officers, normalising and encouraging criminal behaviour.
- The call to "surround" judges on the streets [00:35:19] and the repeated justification for "protest by taking off a shoe" [02:21:48] actively promotes public disorder and violence against public figures.

4. Public Figures Policy

While public figures are subject to public scrutiny and criticism, YouTube's policies do not permit content that targets them with threats, harassment, or incitement to violence. The content in these videos far exceeds legitimate criticism and delves into direct threats, dehumanising language, and calls for physical harm, which is strictly prohibited, regardless of the target's public status.

5. Integrity and Security Policy

These videos fundamentally violative of the integrity and security of the judicial system. By propagating baseless accusations of the CJI being "compromised" [00:21:17] and questioning the impartiality of the judiciary, the content erodes public trust in a critical democratic institution. Such narratives can lead to societal instability and a breakdown of the rule of law.

YouTube's stated commitment to fostering a safe and respectful community necessitates the immediate and permanent removal of these videos and decisive action against the channel responsible. The continued presence of such content on your platform not only exposes the Chief Justice to real and imminent danger but also sends a perilous message that incitement to violence and deeply rooted hate speech are tolerated, or even inadvertently amplified.

Violation of Indian Laws:

The content of these videos does not merely contravene YouTube's internal policies; it constitutes a clear and cognizable offense under various stringent Indian laws, particularly those designed to combat hate speech, protect marginalised communities, and uphold the dignity of constitutional offices.

1. Information Technology Rules and the Bharatiya Nyaya Sanhita, 2023 (BNS)

The **Information Technology (Guidelines for Intermediaries and Digital Media Ethics Code) Rules, 2021 (IT Rules, 2021)**, which are the latest legal framework governing social media intermediaries like YouTube in India, mandate strict due diligence obligations.

Rule 3(1)(b) unequivocally requires platforms like YouTube to exercise due diligence regarding any content that is “defamatory, obscene, pornographic, paedophilic, invasive of another’s privacy, including bodily privacy, insulting or harassing on the basis of gender, libellous, racially or ethnically objectionable, relating or encouraging money laundering or gambling, or otherwise inconsistent with or contrary to the laws of India.”

More specifically, Rule 3(1)(b)(viii) is directly applicable and states that an intermediary shall inform users not to host or share any information that:

“...threatens the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign States, or public order, or causes incitement to the commission of any cognisable offence or prevents investigation of any offence or is insulting other nation;”

The content hosted on your platform is in direct violation of this rule and constitutes several cognizable offenses under the Bharatiya Nyaya Sanhita, 2023 (BNS), India's new penal code.

- The explicit call for *“one Hindu lawyer should grab Gavai ji's head and smash it against the wall with such force that it breaks into two pieces”* is a clear instance of abetment and incitement (as defined under Section 45 of the BNS) to commit extremely serious cognisable offences, including Attempt to Murder (Section 109, BNS), voluntarily causing Grievous Hurt (Section 117, BNS), and Criminal Intimidation (Section 342, BNS).
- The repeated threats that what happened in court *“can happen to them on the streets tomorrow”* against judges, coupled with the glorification of violence, directly *“threatens... public order.”*
- Furthermore, the systematic spread of hatred and baseless allegations against the Chief Justice, the head of the judiciary, inherently threatens the very fabric of the nation. This act of undermining public faith in constitutional institutions falls under the ambit of Acts endangering sovereignty, unity and integrity of India, which is punishable under Section 152 of the Bharatiya Nyaya Sanhita, 2023.

Under Rule 4 of the IT Rules, 2021, a Significant Social Media Intermediary like YouTube is required to appoint a Chief Compliance Officer, a Nodal Contact Person for 24x7 coordination with law enforcement, and a Resident Grievance Officer, in addition to publishing periodic compliance reports. The continued presence of such illegal content, despite its having become the subject of multiple FIRs and police questioning, raises serious questions about YouTube's adherence to these due diligence requirements and its responsiveness to lawful government directions.

2. Violation of the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (SC/ST Act)

The content in these videos constitutes egregious and cognizable offenses under India's stringent Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 (SC/ST Act). This landmark legislation is specifically enacted to prevent atrocities and hate crimes, provide for special courts for the trial of such offenses, and ensure the relief and rehabilitation of victims from Scheduled Castes and Scheduled Tribes. The impugned videos directly violate several key provisions of this Act:

- **Section 3(1)(r) of the SC/ST Act states:** *"Whoever, not being a member of a Scheduled Caste or a Scheduled Tribe, intentionally insults or intimidates with intent to humiliate a member of a Scheduled Caste or a Scheduled Tribe in any place within public view shall be punishable with imprisonment for a term which shall not be less than six months but which may extend to five years and with fine."*
- **Section 3(1)(s) of the SC/ST Act states:** *"Whoever, not being a member of a Scheduled Caste or a Scheduled Tribe, abuses any member of a Scheduled Caste or a Scheduled Tribe by caste name in any place within public view shall be punishable with imprisonment for a term which shall not be less than six months but which may extend to five years and with fine."*

The remarks made against CJI Gavai are far from general criticism as they are systemically targeted at his Dalit identity, which is a protected category under the SC/ST Act. The derisive and demeaning insinuations regarding his "inherent inferiority", the mocking references to "Ambedkarite" ideology, and the profoundly offensive and dehumanising language equating his background with "dead cow leather" and "sewer" are unequivocal instances of intentional insults and intimidation with the explicit intent to humiliate a member of a Scheduled Caste. These statements, broadcast on a widely accessible public platform like YouTube, clearly occur "in any place within public view."

This judicial recognition highlights that the content explicitly perpetuates historical caste discrimination and attempts to dehumanise the dignity of a Scheduled Caste individual, even one holding the highest judicial office. By hosting this content, YouTube facilitates the commission of a caste-based atrocity, making the platform complicit in offenses under the SC/ST Act.

3. Hate Speech Laws under Indian Jurisprudence

Indian jurisprudence on hate speech, as developed by the Supreme Court of India, provides a clear framework that these videos flagrantly violate.

In *Pravasi Bhalai Sangathan v. Union of India*, 2014 11 SCC 477, the Supreme Court unambiguously stated that hate speech is an effort to marginalise individuals based on their membership to a group, that can have a social impact. Moreover, the Court stated that hate speech lays the groundwork for broad attacks on the vulnerable that can range from discrimination, to ostracism, deportation, violence, and even to genocide.

In the same case, the Supreme Court cited Canada (*Human Rights Commission*) v. Taylor, (1990) 3 SCR 892, stating, "Three main prescriptions must be followed while interpreting the word "hatred" as is used in legislative provisions prohibiting hate speech. First, courts must apply the

hate speech prohibition objectively. The question courts must ask is whether a reasonable person, aware of the context and circumstances, would view the expression as exposing the protected group to hatred. Second, the legislative term “hatred” or “hatred or contempt” must be interpreted as being restricted to those extreme manifestations of the emotion described by the words, “detestation” and “vilification”. This filters out expression which, while repugnant and offensive, does not incite the level of abhorrence, delegitimation and rejection that risks causing discrimination or other harmful effects. Third, tribunals must focus their analysis on the effect of the expression at issue, namely whether it is likely to expose the targeted person or group to hatred by others. The repugnancy of the ideas being expressed is not sufficient to justify restricting the expression, and whether or not the author of the expression intended to incite hatred or discriminatory treatment is irrelevant. The key is to determine the likely effect of the expression on its audience, keeping in mind the legislative objectives to reduce or eliminate discrimination.”

In the case of *Amish Deygan vs Union Of India 2021 1 SCC 1*, the Supreme Court quoted Benjamin Franklin, *“It remains difficult in law to draw the outmost bounds of freedom of speech and expression, the limit beyond which the right would fall foul and can be subordinated to other democratic values and public law considerations, so as to constitute a criminal offence. The difficulty arises in ascertaining the legitimate countervailing public duty, and in proportionality and reasonableness of the restriction which criminalises written or spoken words. Further, criminalisation of speech is often demarcated and delineated by the past and recent significant events affecting the nation including explanation of their causes. Therefore, constitutional and statutory treatment of ‘hate speech’ depends on the values sought to be promoted, perceived harm involved and the importance of these harms. 57 Consequently, a universal definition of ‘hate speech’ remains difficult, except for one commonality that ‘incitement to violence’ is punishable.”*

The court elaborated on the concept of Hate Speech by identifying three elements:

- **Content-based:** Open use of words and phrases generally considered to be offensive to a particular community and objectively offensive to the society.
- **Intent-based:** Speaker’s message to intend only to promote hatred, violence or resentment against a particular class or group.
- **Harm-based/ impact-based:** There is an element of harm to the victim which can be violent or such as loss of self-esteem, economic or social subordination, physical and mental stress, silencing of the victim and effective exclusion from the political arena.

In the same case, the Apex court also cited Andre Sellars from his essay ‘Defining Hate Speech’ where he examined the concept of hate speech in different democratic jurisdictions and formulated common traits in defining ‘hate speech’. He says:

- Hate speech targets a group, or an individual as a member of the group
- One should be able to objectively identify the speech as an insult or threat to the members of the targeted group, including stigmatising the targeted group by ascribing to it qualities widely disregarded as undesirable
- Speech should cause harm, which can be physical harm such as violence or incitement and true threats of violence

- Speech should have no redeeming purpose, which means that ‘the speech primarily carries no meaning other than hatred towards a particular group.

In the case of *State of Karnataka and anr vs. Dr Pravinbhai Togadia* (2004) 4 SCC 684, the Supreme Court held, “Communal harmony should not be made to suffer and be made dependent upon the will of an individual or a group of individuals whatever be their religion bit of a minority or that of the majority... the valuable and cherished right of freedom of expression and speech may at times have to be subjected to reasonable subordination to social interests needs and necessities to preserve the very core of democratic life preservation of public order and rule of law. At some such grave situation at least the decision as to the need and necessity to take private reactions must be left to the discretion of those entrusted with the duty of maintaining law and order and interposition of courts...”

The content of the complained videos, with their explicit calls for violence, grossly derogatory remarks, dehumanising caricatures, and attempts to instigate hatred against the Chief Justice of India based on his perceived caste identity and judicial actions, clearly satisfies all three elements (content-based, intent-based, harm-based) for hate speech as established by the Supreme Court of India in *Amish Devgan*. The language used is objectively offensive, intends to promote hatred and violence against the CJI and, by extension, the Dalit community, and has the potential to cause significant harm, including incitement to real-world violence. The content also directly violates the principles of communal harmony and public order elucidated in *Pravasi Bhalai Sangathan and Dr. Pravinbhai Togadia*.

4. Targeting the highest post of the judiciary:

The continuous dissemination of derogatory and inciting content against the Chief Justice of India is not merely an attack on an individual, but a direct and insidious assault on the very foundation of India's constitutional democracy: the independent judiciary. The Chief Justice of India occupies the apex position of the third pillar of the state, serving as the guardian of the Constitution and the ultimate arbiter of justice. Targeting such an office with calls for violence, public humiliation, and casteist propaganda represents a profound threat to the rule of law and the stability of the nation.

- **Threatening judicial independence:** The threats of physical violence ("smash his head against the wall"), the warnings of public attacks ("same can happen to them on the streets tomorrow"), and the relentless personal abuse ("coward (fattu)") are direct attempts to intimidate the Chief Justice and, by extension, the entire judiciary. This creates an environment where judges may fear delivering unpopular judgments, thus compromising their independence and impartiality.
- **Scandalising the court and public trust:** The malicious accusations of the CJI being "compromised", biased, and acting out of "innate hatred" are calculated to "scandalise the court." Such allegations, especially when coupled with casteist slurs and calls for violence, severely erode public confidence in the integrity and fairness of the judicial system. When the highest judicial officer is subjected to such vitriol, it fosters a dangerous narrative that the institution itself is corrupt or illegitimate, leading to anarchy and disrespect for legal processes.

- **Incitement to public disorder against constitutional authorities:** Encouraging public gatherings to "surround" judges and justifying physical assaults like "shoe attacks" against them is a direct incitement to public disorder and violence against constitutional functionaries. This is a severe threat to public peace and security, particularly in a diverse and populous nation like India where respect for institutions is paramount. The judiciary, through figures like Supreme Court Judge Augustine Masih, are actively working to build bridges through initiatives like the inauguration of 73 mediation centres in Gujarat, highlighting their commitment to peaceful dispute resolution. The content on your platform directly contradicts and sabotages such efforts by propagating violence and division.
- **Violation of constitutional dignity:** The office of the Chief Justice of India embodies the dignity and authority of the Supreme Court. The derogatory, abusive, and casteist language used against CJI Gavai directly attacks this constitutional dignity. It is essential for democratic functioning that high constitutional offices are protected from such malicious and inflammatory attacks, which are designed to denigrate the institution through the individual.

The sheer volume and intensity of the targeted abuse, combined with explicit calls for violence and caste-based discrimination against the Chief Justice of India, present an unprecedented challenge to the rule of law. YouTube's immediate intervention is critical to uphold its own policies and to prevent further damage to India's democratic institutions.

International Human Rights Law and Corporate Responsibility:

As per United Nations Secretary-General António Guterres, June 2019, "Addressing hate speech does not mean limiting or prohibiting freedom of speech. It means keeping hate speech from escalating into more something more dangerous, particularly incitement to discrimination, hostility and violence, which is prohibited under international law." Under the International Human Rights Law, there is no formal definition of 'hate speech' but most UN instruments refer to 'incitement to discrimination, hostility or violence'. Prohibition of Hate Speech under International Law:

- 1) Universal Declaration of Human Rights provides equal protection to all against any discrimination in violation of the Declaration and against any incitement to such discrimination. (art. 7)
- 2) The International Convention on the Elimination of all Forms of Racial Discrimination (CERD), adopted by the UN General Assembly in 1965, prohibits "propaganda" and "dissemination of ideas" in relation to racial superiority and racial discrimination, including from public authorities or public institutions (art. 4).
- 3) International covenant on Civil and Political Rights provides that any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law. [art. 20(2)].
- 4) The Convention on the Prevention and Punishment of the Crime of Genocide (or Genocide Convention) – punishes direct and public incitement to commit genocide. (art. 3).

5) The Rome Statute of the International Criminal Court adopted in 1998 also holds “criminally responsible and liable for punishment” those who “directly and publicly incites others to commit genocide” (art. 25).

The prohibition of hate, discrimination, hostility or violence is also reflected in the 1969 American Convention on Human Rights (ACHR). Most importantly, under the United Nations Guiding Principles on Business and Human Rights, Business enterprises have responsibility to respect human rights, address adverse human rights impacts with which they are involved and provide for their remediation. As per the Guidelines, business enterprises should carry out human rights due diligence (HRDD) in order to identify, prevent, mitigate and account for how they address their adverse human rights impact. Under the HRDD process, they should assess actual and potential human rights impacts, integrate and act upon the findings, track responses and communicate how impacts are addressed.

Realising the potential significant effects on citizens’ rights and freedoms with the proliferation of fake news and hateful content prevalent on social media, the European Parliament and EU Member States have reached consensus on the Digital Services Act (DSA) which establishes accountability standards for online platforms and protects European users from hate speech, disinformation and other harmful content. Under this law, the social media platforms will have to add new procedures for faster removal of content deemed harmful and would be liable if the platforms do not remove any illegal content they detect or brought to their attention despite being aware of such acts. Though this move is in the pipeline it is still relevant, YouTube surely cannot adhere to one set of standards in India and another in Europe?

Keeping in mind the gravity of the issue, it is expected from YouTube, with a large global reach and millions of users, that such content that violates its policies and which is evidently illegal, is regulated and to ensure that there are certain algorithms or any other method to embargo such content from being published in the first place. Misuse of Social media platforms has become a common practice. It is the moral and social obligation of platforms like YouTube to take concrete steps to ensure that its platform is used for the purpose it was meant for in the first place instead of becoming a breeding ground for targeted harassment, hateful content and abuse. Among various media platforms, social media has emerged as the strongest. Therefore, there is an urgent need to ensure responsible usage of the same. In fact, self-regulation should be seen as a moral and ethical practice.

We believe, as a social media platform, YouTube owes it to its users to be a responsible company fulfilling its purpose. We hope that you consider this matter seriously in the light of the environment in our country and take some serious measures to implement better technology in order to remove such abusive, communal and illegal content, at the earliest.

We strongly urge you to take concrete steps in order to stop such abuse on your platform as the same has the potential to incite crime in real time and in all possibility can convert into targeted violence towards the Dalit Community. This will give a sense of security to the minority community and also strengthen the values of fraternity and secularism that our Constitution of India upholds. We urge and expect urgent action in this regard. We also anticipate and expect a detailed response on this complaint from the YouTube platform failing which we shall initiate alternate remedies.

Prayer for immediate and decisive action:

Therefore, in light of the given evidence of widespread violations of YouTube's Community Guidelines and Policies, coupled with clear infringements of Indian law, including criminal statutes, and considering the active police investigations and the profound threat to the Chief Justice of India and the Indian judiciary, we, Citizens for Justice and Peace (CJP), hereby respectfully and emphatically pray to YouTube (Google LLC) to:

1. **IMMEDIATELY REMOVE AND PERMANENTLY DELETE** both videos from the YouTube platform:

- "S2E2: CJI Gavai Vs Sleeping Hindus | Sonam Wangchuk A Deep State Project | Kaushlesh, Anupam, Ajeet"

(Link: <https://youtu.be/FoL8q6M7fIU?si=GCiPFTQGr4chSOnc>)

- "Shoe Attack on CJI Gavai: Leftsist Baying For Ajeet Bharti Blood | Ajeet Bharti LIVE"

(Link: <https://www.youtube.com/live/Z2-5pY55D5I?si=OJ4fj-xDTzpTUIDS>)

These videos constitute egregious and ongoing violations of your policies on Hate Speech, Harassment & Cyberbullying, and Incitement to Violence, and are prima facie illegal under Indian law, including the Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989.

2. **PERMANENTLY SUSPEND AND DEPLATFORM** the YouTube channel **[@ajeetbharti]** with immediate effect. The channel's repeated and deliberate dissemination of content inciting violence, spreading virulent hate speech, promoting anti-Dalit propaganda, and directly targeting the Chief Justice of India demonstrates a clear pattern of abuse and a systematic disregard for your platform's safety policies and legal obligations.

3. **IMPLEMENT ROBUST AND ADVANCED CONTENT MODERATION SYSTEMS AND ALGORITHMIC SAFEGUARDS** to proactively identify, prevent, and immediately remove similar harmful, discriminatory, and illegal content from being published or remaining on your platform. This is particularly crucial concerning incitement to violence against judicial officers, hate speech targeting individuals based on their identity, and attacks on constitutional institutions.

4. **INITIATE A COMPREHENSIVE INTERNAL INVESTIGATION** into the **[@ajeetbharti]** channel's content history and its adherence to your policies, taking all necessary actions to ensure such malicious content does not reappear or find new avenues on your platform.

5. **PROVIDE A DETAILED AND COMPREHENSIVE RESPONSE** to this formal complaint within 72 hours, confirming the specific actions taken with respect to the aforementioned videos and channel, and outlining the concrete measures being implemented to prevent recurrence of such serious violations. This response should also address YouTube's compliance with Indian IT Rules, 2021, especially in light of the ongoing police actions.

Your failure to act decisively and promptly on this matter will be viewed as a grave dereliction of your duties as a significant social media intermediary and as tacit complicity in the dissemination of criminal hate speech and incitement to violence against the highest judicial office in India. We emphasise that such inaction will compel us to pursue all available alternate legal remedies against Google LLC/YouTube, both in India and internationally.

Yours sincerely,

Nandan Malsute (President)

Teesta Setalvad (Secretary)