

Date: December 19, 2025

To,

Sh. Gyanesh Kumar

Chief Election Commissioner

Election Commission of India, New Delhi

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Shri S. Chockalingam

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State Election Commission, Maharashtra

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Subject: Complaint under the Model Code of Conduct and the Representation of the People Act, 1951 against BJP Mumbai President Ameet Satam for Communal and Hate-Based Remarks at Malad West, Mumbai (December 6, 2025)

Respected Sirs,

We, at Citizens for Justice and Peace (CJP), are submitting this complaint seeking urgent action against Ameet Satam, President of the Bharatiya Janata Party (BJP), Mumbai, for making communal, inflammatory, and hate-based remarks during the inauguration of a BJP office in Ward No. 47, Malad West, Mumbai, on December 6, 2025, at a time when the Model Code of Conduct (MCC) is in force in connection with the ongoing local body (BMC) electoral process.

At the said event, Satam delivered a speech alleging that “jihadis” had infiltrated the Goregaon Sports Club, accused Muslims of facilitating Rohingya and Bangladeshi migrants in acquiring land and documents, and propagated conspiracy narratives such as “vote jihad” and “land jihad.” He further invoked demographic fear by suggesting that Muslim presence threatens the social and electoral composition of the area.

These statements amount to hate speech, communal vilification, and a direct attempt to polarise the electorate on religious lines, in clear violation of the Model Code of Conduct, the Representation of the People Act, 1951, and constitutional guarantees.

Factual background

On December 6, 2025, during the public inauguration of a BJP office in Ward No. 47, Malad West, Ameet Satam made the following assertions (as recorded in publicly available video footage circulated widely online, including by Hindutva Watch):

- That “jihadis” had infiltrated the Goregaon Sports Club;
- That Muslims assist Rohingyas and Bangladeshis in illegally acquiring land and identity documents;
- That there exists a deliberate conspiracy of “vote jihad” and “land jihad”; and
- That demographic change caused by Muslims poses a threat to society and governance.

The speech was delivered in a public political setting, before party workers and residents, and was subsequently disseminated widely, amplifying its impact.

Link: <https://t.me/hindutvawatchin/3418>

The video of the speech has been downloaded by CJP and is marked and annexed hereto as **Annexure A**.

Nature of the violations

The impugned remarks are not isolated political criticism. They are religion-centric allegations that:

- Criminalise an entire religious community by association with terrorism (“jihadis”);
- Dehumanise Muslims by portraying them as conspirators and demographic threats;
- Create fear and suspicion against minority voters; and
- Seek to influence electoral behaviour through communal polarisation.

The use of phrases like “vote jihad” and “land jihad” has no legal or factual basis and functions solely as a dog-whistle narrative to consolidate votes through fear and hostility.

Legal violations

I. Violations of the Model Code of Conduct

The Model Code of Conduct (Part I – General Conduct) explicitly prohibits:

- Appeals to caste or communal feelings for securing votes;
- Aggravation of existing differences or creation of mutual hatred between religious communities; and
- Use of unverified or false allegations that may vitiate the electoral atmosphere.

Satam's remarks violate these prohibitions by:

- Using religious identity as the basis of political mobilisation;
- Painting Muslim citizens as infiltrators and conspirators; and
- Fostering mistrust and hostility during an electoral period.

The Election Commission has repeatedly held that communal dog-whistles and coded hate speech are as impermissible as explicit religious appeals.

II. Violations of the Representation of the People Act, 1951

The speech attracts the following statutory violations:

Section 123(3) – Appeal on grounds of religion- By invoking Muslims as a collective threat and contrasting them with the implied “law-abiding majority,” the speech amounts to an indirect but unmistakable appeal to religion.

Section 123(3A) – Promotion of enmity or hatred- The repeated references to “jihadis,” “Rohingyas,” “Bangladeshis,” and conspiracies of land and vote capture promote hatred and hostility between religious communities.

Section 125 – Promoting enmity in connection with elections- The speech seeks to generate fear of a religious minority during an election, squarely attracting the penal consequences under Section 125.

The Supreme Court in *Abhiram Singh v. C.D. Commachen* (2017) has unequivocally held that any appeal, direct or indirect, that brings religion into the electoral arena strikes at the root of secular democracy.

III. Constitutional violations

The impugned speech violates core constitutional principles:

- **Article 14** – Equality before law, by portraying Muslims as inherently suspect;
- **Article 15** – Prohibition of discrimination on grounds of religion;
- **Article 19(1)(a)** – Abuse of free speech, which does not protect hate speech;
- **Article 21** – Right to dignity, compromised through stigmatisation and fear-mongering;
- **Preamble** – Secularism and fraternity, undermined by communal narratives.

The Supreme Court has repeatedly held that speech which erodes dignity, equality, and fraternity cannot claim constitutional protection.

Impact on the electoral environment

Malad West and surrounding areas have a religiously diverse population. The remarks in question:

- Risk polarising voters along communal lines;
- Intimidate minority voters and discourage political participation;
- Normalise conspiracy theories as electoral tools; and
- Undermine public confidence in the fairness of the electoral process.

Such speech, if left unchecked, lowers the threshold of acceptable discourse and emboldens further communal targeting.

Prayer

In view of the above, we respectfully request that the Election Commission of India and the State Election Commission, Maharashtra:

1. Take immediate cognisance of this complaint and the video evidence.
2. Initiate proceedings against Ameet Satam for violations of the MCC.
3. Issue a show-cause notice and impose appropriate sanctions, including censure and restrictions on campaigning.
4. Direct law enforcement authorities to examine penal liability under Section 125 of the RPA, 1951.
5. Issue a general advisory to political parties against the use of communal conspiracy narratives such as “vote jihad” and “land jihad.”

Yours faithfully,

Nandan Maluste

President, Citizens for Justice and Peace

Teesta Setalvad

Secretary, Citizens for Justice and Peace

Annexure

Annexure A: Video clip of Ameet Satam delivering the speech