

Date: December 23, 2025

To,

**Smt. Rashmi Shukla**

The Director General of Police, Maharashtra  
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**Vilas Bhonsale**

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CC:

**National Commission for Minorities (NCM)**

Government of India, New Delhi  
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[secy-ncm@nic.in](mailto:secy-ncm@nic.in)

Respected Ma'am/Sir,

We, at Citizens for Justice and Peace (CJP), submit this second and urgent follow-up complaint in continuation of our detailed complaint dated November 25, 2025, concerning acts of communal vigilantism, religious profiling, forced identity verification, and public intimidation of Muslim street vendors by Raj Saraf, former office bearer of the Bharatiya Janata Yuva Morcha, at Malabar Hill, Mumbai.

We are constrained to approach you again because despite the gravity of the earlier complaint, no visible deterrent action appears to have been taken, and fresh incidents involving the same individual have since occurred at the same location, exhibiting not only repetition but clear escalation in both rhetoric and consequences. The cumulative effect of these incidents is the systematic conversion of public space into a site of religious policing, where Muslim citizens are repeatedly portrayed as illegal, dangerous, and undeserving of livelihood.

The complaint sent by CJP on November 25, 2025 has been annexed and attached to this complaint as Annexure A.

**A continuing course of conduct, not isolated episodes**

The incidents described below must be read together with the November 13, 2025 incident detailed in our earlier complaint. When seen cumulatively, they establish a continuing, deliberate, and aggravated course of conduct involving:

- Recurrent targeting of Muslim vendors by name, appearance, and presumed religious identity
- Escalating use of conspiratorial tropes such as “jihad,” “illegal Aadhaar,” and “national security threat”
- Open pressure on civic and police authorities to act against a religious group
- Direct and immediate material consequences, including removal of stalls, loss of livelihood, and police custody
- Persistent assumption of State authority by a private individual, without legal mandate

This pattern demonstrates knowledge, intent, and impunity, converting hate speech into administrative and police action on the ground.

### **Subsequent incidents requiring immediate legal intervention**

#### **Incident dated December 6, 2025**

**Location:** Malabar Hill, Mumbai

On December 6, 2025, Raj Saraf publicly accused Muslim hawkers operating in the Malabar Hill area of engaging in “land jihad.” He openly demanded that authorities take action against them. Following his public statements, the vendors’ stalls were removed and the vendors were handed over to the police.

This incident is documented in a video circulated widely on social media and accessed by CJP: <https://t.me/hindutvawatchin/3379>

The video has been downloaded CJP has been annexed and attached to this complaint as Annexure B.

The invocation of “land jihad” is not casual rhetoric. It is a loaded communal conspiracy theory, frequently used to suggest that Muslims are collectively engaged in covert territorial and demographic aggression. By deploying this phrase in a public market context, Saraf reframed lawful economic activity as a criminal and anti-national enterprise, thereby legitimising coercive action against an entire religious group.

#### **Incident dated December 17, 2025**

**Location:** Malabar Hill, Mumbai

On December 17, 2025, Saraf once again targeted Muslim hawkers in the same area, this time alleging—without evidence—that they possessed illegal Aadhaar cards and portraying them as a threat to national security. He further stated publicly that he wished to emulate the actions of the AIYPO in targeting what he described as “illegal Muslim immigration” into India.

As in earlier instances, these statements were followed by the removal of Muslim vendors’ stalls, directly linking hate speech with coercive administrative outcomes.

This incident is documented here: <https://t.me/hindutvawatchin/3449>

The allegation of “illegal Aadhaar” is particularly serious, as it imputes fraud, illegality, and foreignness without any due process. Such accusations, when made publicly by politically affiliated individuals, invite harassment, detention, and exclusion, and carry grave risks of vigilante violence.

The video has been downloaded CJP has been annexed and attached to this complaint as Annexure C.

### **Escalation, impunity, and institutional breakdown**

The repetition of these acts at the same location, by the same individual, over a short span of time, raises urgent questions about preventive policing and institutional accountability.

When a private individual repeatedly:

- Declares members of a religious community “illegal” or “anti-national”
- Publicly demands police action
- Successfully triggers removal of livelihoods and police intervention

—without facing restraint or prosecution, it creates a parallel system of authority, where hate speech effectively substitutes for lawful process.

This not only emboldens the perpetrator but also signals to the public that communal intimidation is permissible, thereby encouraging imitation and escalation elsewhere.

### **Severe impact on livelihood, dignity, and public order**

Street vendors represent one of the most economically vulnerable groups in urban India. Repeated eviction, humiliation, and police action based on religious suspicion directly threaten their right to livelihood, dignity, and physical safety.

Markets are shared civic spaces. When such spaces are repeatedly transformed into zones of religious surveillance and exclusion, they cease to function as neutral economic sites and instead become theatres of majoritarian dominance. This has a chilling effect not only on Muslim vendors but on inter-community relations, fostering fear, resentment, and withdrawal.

Mumbai’s history of communal violence makes such developments particularly dangerous. Public branding of Muslims as “security threats” in crowded urban spaces has the potential to spark panic, retaliatory conduct, or spontaneous violence, thereby endangering public peace.

### **Economic exclusion as a tool of communal punishment**

It is important to underscore that street vendors are among the most economically precarious workers in urban India. By repeatedly instigating the removal of Muslim vendors’ stalls, Saraf’s actions amount to targeted economic punishment based purely on religious identity.

Such acts function as a form of collective penalty, where Muslim citizens are made to understand that their right to livelihood is contingent upon political approval and communal conformity. This is not merely discriminatory — it is structural exclusion, enforced through intimidation and public spectacle.

The Supreme Court has repeatedly recognised that the right to livelihood is an integral part of Article 21, and that economic deprivation imposed arbitrarily and discriminatorily strikes at human dignity.

### **Legal violations (aggravated by repetition and continuity)**

The acts of Saraf, read cumulatively, attract serious offences under the Bharatiya Nyaya Sanhita, 2023, including:

- **Section 196** – Promoting enmity between groups on grounds of religion
- **Section 197** – Imputations prejudicial to national integration
- **Section 297** – Statements conducing to public mischief
- **Section 351** – Criminal intimidation
- **Section 124** – Assumption of public authority
- **Section 335** – Wrongful restraint and coercion

The recurrence of these acts satisfies the legal threshold for continuing offences, warranting stricter scrutiny and decisive action.

Constitutionally, these incidents constitute serial violations of Articles 14, 15(1), 19(1)(g), 21, and 25, and directly undermine the principles of secularism, fraternity, and equality of citizenship enshrined in the Preamble.

### **Reliefs sought**

In light of the continuing and aggravated nature of these violations, we respectfully seek:

#### **Before the Maharashtra Police**

1. Immediate registration of a comprehensive FIR covering the incidents of November 13, December 6, and December 17, 2025.
2. Application of provisions relating to continuing and repeated offences.
3. Examination of whether any police or civic officials acted upon unlawful verbal directions arising from hate speech.
4. Issuance of clear preventive directions prohibiting any individual from conducting identity checks or directing action against vendors.
5. Assurance of protection, non-discrimination, and restoration of livelihood for affected Muslim vendors.

**Before the National Commission for Minorities**

1. Expansion of the scope of inquiry to include all subsequent incidents.
2. Summoning of Raj Saraf for explanation regarding repeated communal targeting.
3. Calling for a detailed compliance and status report from Mumbai Police.
4. Issuance of strong national advisories against communal profiling and economic exclusion of minorities in public markets.

These events collectively demonstrate how unchecked hate speech metastasises into material harm, eroding constitutional guarantees in everyday life. Failure to intervene decisively at this stage will not only deny justice to the affected vendors but will normalise religious vigilantism as an acceptable mode of governance.

We therefore urge immediate, firm, and visible action.

Yours sincerely,

**Nandan Maluste**

President, Citizens for Justice and Peace

**Teesta Setalvad**

Secretary, Citizens for Justice and Peace

**Annexures:**

Annexure A- Previous complaint dated November 25, 2025

Annexure B – Video dated December 6, 2025

Annexure C – Video dated December 17, 2025