

**Date: December 31, 2025**

**To,**

**National Commission for Minorities (NCM)**

Government of India, New Delhi

[chairman-ncm@nic.in](mailto:chairman-ncm@nic.in)

[secy-ncm@nic.in](mailto:secy-ncm@nic.in)

**CC:**

**Shri Kailash Makwana, IPS**

The Director General of Police

Madhya Pradesh

[dgpmp@mppolice.gov.in](mailto:dgpmp@mppolice.gov.in)

**Smt. Rashmi Shukla, IPS**

The Director General of Police, Maharashtra

State Police Headquarters, Mumbai

[dgpms.mumbai@mahapolice.gov.in](mailto:dgpms.mumbai@mahapolice.gov.in)

Respected Sir/Madam,

We, at Citizens for Justice and Peace (CJP), a constitutional rights organisation working nationally on issues of communal harmony, minority protection, and accountability for hate speech, hereby submit this comprehensive and standalone complaint against Kalicharan Maharaj (also known as Abhijit Dhananjay Sarag) for delivering repeated, public, and overtly incendiary hate speeches across multiple States between October 2024 and January 2025.

This complaint concerns three distinct public events held in Madhya Pradesh and Maharashtra, where Kalicharan Maharaj openly engaged in demonisation, exclusionary calls, conspiracy-mongering, and incitement against the Muslim community, portraying an entire religious group as disloyal, dangerous, and unfit to participate in India's civic, economic, and national life.

This complaint is being filed independently of, and in addition to, earlier complaints made by CJP against the same individual. A reference complaint dated August 9, 2024 (Nashik, Maharashtra) is annexed to this complaint to demonstrate continuity, recurrence, and escalation in both the content and intensity of Kalicharan Maharaj's hate speech.

The previous complaint sent by CJP against Kalicharan Maharaj, dated, August 9, 2024, is annexed and attached here as Annexure A.

### **Detailed description of incidents**

#### **A. Bhopal, Madhya Pradesh**

Date: January 8, 2025

Event: “Rising Madhya Pradesh” organised by News18

At a widely publicised event organised by a national media house, Kalicharan Maharaj delivered a speech containing explicit calls for exclusion of Muslims from public and economic life, accompanied by fabricated conspiracy theories and demographic fear-mongering.

During this speech, Kalicharan Maharaj:

- Called for the exclusion of Muslim vendors from the Kumbh Mela, a major religious and economic congregation, thereby advocating religious segregation of public spaces;
- Promoted fabricated conspiracies such as “spit jihad” and “urine jihad,” falsely portraying Muslims as deliberately contaminating food and public spaces;
- Asserted that Muslims do not belong in India, declaring that India is a nation meant exclusively for Hindus;
- Claimed that Muslim population growth itself constitutes violence against Hindus, reframing demographic presence as an act of aggression;
- Advocated for a population control law based on false claims that Muslims “keep having ten children”;
- Accused Muslims of plotting to destroy the Ram Mandir, imputing collective criminal intent;
- Invoked the conspiracy of “Ghazwa-e-Hind,” thereby portraying Indian Muslims as an internal enemy engaged in civilisational warfare.

Video reference: <https://t.me/hindutvawatchin/1250>

Video of the speech is downloaded by CJP, and has been annexed and attached here as Annexure B.

The language used was not metaphorical or symbolic. It was categorical, exclusionary, and absolutist, denying Muslims any legitimate claim to equal citizenship and actively encouraging their removal from shared civic spaces.

## **B. Nallasopara, Palghar District, Maharashtra**

Date: December 8, 2024

Event: Shri Devi Bhagwat Katha

At this religious discourse, Kalicharan Maharaj continued his pattern of historical falsification and moral panic, claiming:

- That Hindus are being systematically “beaten”;
- That 100,000 temples were destroyed by invaders;
- That 100,000 cows are slaughtered every day;

- That 40,000 Hindu women fall victim to “love jihad” every single day.

Video reference: <https://t.me/hindutvawatchin/3431>

Video of the speech is downloaded by CJP, and has been annexed and attached here as Annexure C.

These figures are demonstrably false, yet presented as fact, with the clear intent of generating anger, fear, and hostility towards Muslims.

### **C. Pune, Maharashtra**

Date: October 25, 2024

Event: Ganesh Janmotsav

At this religious gathering, Kalicharan Maharaj once again delivered fear-based propaganda targeting Muslims. He:

- Claimed that Muslims intend to convert India into a Sharia country within 15 years;
- Engaged in demographic alarmism, portraying Muslim population growth as an existential threat;
- Explicitly promoted cow vigilantism, legitimising extra-legal violence and enforcement by private individuals.

Video reference: <https://t.me/hindutvawatchin/3173>

Video of the speech is downloaded by CJP, and has been annexed and attached here as Annexure D.

The speech directly endorsed vigilantism and suggested that lawful institutions are either inadequate or unnecessary when dealing with Muslims — a message that normalises violence outside the rule of law.

### **Nature of the Speech: Why this is hate speech in law**

The speeches complained of are not religious preaching, political opinion, or social critique. They constitute hate speech in its clearest legal sense because they:

- Attribute collective guilt to an entire religious community;
- Deny Muslims their right to belong to the nation;
- Portray Muslims as conspirators and existential threats;
- Advocate exclusion from public spaces and economic activity;
- Legitimate vigilantism and extra-legal violence;
- Use false data deliberately to inflame passions.

The repeated invocation of conspiracies such as *love jihad*, *land jihad*, *spit jihad*, *Ghazwa-e-Hind*, and demographic warfare demonstrates ideological consistency and intent, not isolated exaggeration.

### **History of serial hate speech by Kalicharan Maharaj**

Kalicharan Maharaj is a known serial hate speaker, not a first-time offender. His documented history includes:

- Repeated delivery of anti-Muslim hate speeches across Maharashtra over several years;
- Registration of FIRs, including in Aurangabad Rural (2023) for hate speech;
- Complaints submitted by CJP to the National Commission for Minorities in May 2023;
- A detailed complaint filed by CJP on August 9, 2024 (Nashik) concerning incendiary speeches delivered in May 2024;
- Continued circulation of his speeches on social media platforms despite prior action.

Despite this history, Kalicharan Maharaj continues to appear at public events, often with institutional visibility, and continues to escalate the severity and explicitness of his rhetoric.

This demonstrates a systemic failure of deterrence, not merely individual misconduct.

### **Impact on public order, minority safety, and the constitutional fabric**

The repeated delivery of such speeches by Kalicharan Maharaj has grave and foreseeable consequences for public order, communal harmony, and the safety of religious minorities. These are not abstract or speculative harms; they are structural and cumulative, produced through sustained propaganda that portrays an entire community as dangerous, illegitimate, and hostile.

First, these speeches manufacture social panic. By repeatedly alleging conspiracies such as *love jihad*, *spit jihad*, *Ghazwa-e-Hind*, and demographic warfare, the speaker constructs a worldview in which ordinary Muslim citizens—street vendors, neighbours, worshippers—are perceived not as individuals but as covert enemies. This narrative transforms everyday coexistence into suspicion, and suspicion into hostility. In such an atmosphere, even routine interactions can escalate into confrontation, harassment, or violence.

Second, the speeches actively legitimise discrimination and exclusion. Calls to bar Muslims from religious congregations such as the Kumbh Mela, or to deny them participation in public and economic spaces, convert prejudice into an actionable social programme. When exclusionary ideas are articulated from a stage, applauded by audiences, and circulated online without consequence, they acquire social legitimacy. This leads to the normalisation of boycotts, denial of services, and segregation—forms of harm that rarely leave visible scars but deeply corrode constitutional citizenship.

Third, these speeches endanger minority safety by encouraging vigilante behaviour. The explicit endorsement of cow vigilantism and the repeated suggestion that State institutions are either complicit or ineffective invite private actors to “take matters into their own hands.” Indian jurisprudence has repeatedly recognised that hate speech does not require an explicit call to violence to be dangerous; it is enough that it creates an enabling environment where violence becomes socially acceptable or morally justified.

Fourth, the impact of such speech is exponentially amplified through digital circulation. The videos referenced herein have been widely shared on social media platforms, meaning that the audience is not limited to those physically present at the events. In the contemporary media ecosystem, a single speech can reach tens of thousands within hours, crossing district and State boundaries. This magnifies harm, intensifies fear among minorities far removed from the event location, and makes preventive policing more—not less—urgent.

Finally, such speeches strike at the core constitutional value of fraternity, explicitly articulated in the Preamble. Fraternity is not a rhetorical flourish; it is the social condition that enables equality and liberty to function. When a public figure repeatedly asserts that Muslims do not belong in India, the promise of fraternity is replaced by a hierarchy of belonging. The long-term consequence is the transformation of citizenship from a legal status into a conditional identity—granted or withdrawn based on religious conformity. This represents a profound constitutional injury.

### **Detailed legal violations attracted by the speeches**

The speeches delivered by Kalicharan Maharaj attract multiple cognisable offences, both under the Bharatiya Nyaya Sanhita, 2023 (BNS) and under corresponding provisions of the Indian Penal Code, 1860 (IPC), and merit immediate registration of FIRs.

#### **Under the Bharatiya Nyaya Sanhita, 2023**

**Section 196 – Promoting enmity between different groups on grounds of religion:** By portraying Muslims as conspirators, infiltrators, and enemies of Hindus, and by framing their population growth and economic activity as acts of aggression, the speeches directly promote enmity between religious groups and are prejudicial to the maintenance of harmony.

**Section 197 – Imputations prejudicial to national integration:** Assertions that Muslims do not belong in India, that they are loyal to foreign or transnational causes, or that they seek to destroy national religious symbols such as the Ram Mandir, amount to imputations questioning their allegiance to the Constitution and the sovereignty of India.

**Section 351 – Criminal intimidation:** The speeches create fear and alarm among Muslims by depicting them as legitimate targets of social exclusion and vigilante action, thereby intimidating an entire community and inducing fear of harm to livelihood, dignity, and safety.

**Section 352 – Intentional insult with intent to provoke breach of peace:** The repeated use of demeaning stereotypes, exaggerated figures, and slurs against Muslims constitutes intentional insult designed to provoke anger, hostility, and potential breaches of public peace.

**Section 353 – Statements causing public alarm or incitement:** The circulation of demonstrably false information—such as claims of tens of thousands of daily victims of “love jihad” or mass destruction of temples and cows—is likely to cause alarm and incite sections of the public to commit offences against another community.

### **Under the Indian Penal Code, 1860**

The same acts attract offences under Sections 153A, 153B, 504, and 505, which criminalise promotion of enmity, assertions prejudicial to national integration, intentional insult, and statements conducing to public mischief.

It bears emphasis that the repetition of such speeches across locations and dates aggravates criminal liability. This is not a one-off lapse of speech but a continuing course of conduct, evidencing intent, knowledge, and disregard for the law.

### **Constitutional obligations, Supreme Court directions, and institutional accountability**

The failure to act decisively against repeated hate speech must be assessed in light of binding constitutional and judicial obligations imposed on law enforcement authorities.

The Hon’ble Supreme Court of India has, in a series of orders since 2022, unequivocally held that:

- Hate speech cannot be tolerated under the guise of free expression;
- Police authorities are duty-bound to act suo moto when hate speech offences occur, even in the absence of a formal complaint;
- Action must be taken irrespective of the religion, political affiliation, or social standing of the speaker;
- Preventive powers under criminal law must be exercised to avert foreseeable communal harm.

In particular, the Supreme Court has clarified that inaction in the face of hate speech amounts to dereliction of constitutional duty. Law enforcement authorities are not passive record-keepers; they are active custodians of constitutional values, entrusted with preserving secularism, equality, and public order.

Further, the principle of constitutional morality, as articulated by the Supreme Court in multiple judgments, requires State institutions to resist majoritarian impulses and social prejudice. Allowing serial hate speakers to repeatedly occupy public platforms without consequence signals institutional acquiescence and erodes public confidence in the neutrality of the State.

It is also relevant that police authorities possess ample preventive powers—including surveillance, recording of speeches, issuance of prohibitory orders, and initiation of preventive action—precisely to prevent the escalation of communal tensions. The continued recurrence of such speeches therefore raises serious questions about institutional will, consistency of enforcement, and accountability.

Finally, failure to act decisively at this stage risks normalising hate speech as a feature of public discourse, thereby lowering the threshold of what is considered acceptable speech. Once such normalisation sets in, the harm becomes far harder to reverse, and the State is forced into reactive crisis management rather than principled governance.

For these reasons, prompt, visible, and legally grounded action is not merely desirable—it is constitutionally mandatory. These speeches strike at the heart of constitutional secularism, equality before law, and fraternity. Failure to act decisively will only deepen impunity and normalise communal hatred in public life.

We urge urgent and transparent action.

**Yours sincerely,**

**Nandan Maluste**

President, Citizens for Justice and Peace

**Teesta Setalvad**

Secretary, Citizens for Justice and Peace

**Annexures:**

Annexure A – Reference Complaint dated August 9, 2024 (Nashik)

Annexure B- Video dated January 8, 2025 downloaded by CJP

Annexure C- Video dated December 8, 2024 downloaded by CJP

Annexure D- Video dated October 25, 2024 downloaded by CJP