



Date: May 12, 2026

To,

Shri Nikhil Gupta (IPS)

Additional Director General (Law & Order), Maharashtra

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Subject: Complaint seeking registration of FIR against BJP MLA Nitesh Narayan Rane for delivering a divisive hate speech, attempt to incite communal enmity, and calling for economic boycott of the Muslim community in Chandivali, Mumbai (Maharashtra) on May 3, 2026

Dear Sirs,

We, at Citizens for Justice and Peace (CJP), a human rights movement dedicated to furthering the constitutional rights of all Indians, are deeply concerned about the divisive communal rhetoric expressed by Nitesh Narayan Rane, BJP MLA and Cabinet Minister for Fisheries & Ports Development, during his speech delivered at a Hindu convention in Chandivali, Mumbai (Maharashtra) on May 3, 2026. At this event, Rane utilised dehumanising slurs, peddled malicious conspiracy theories, and issued a direct call for the economic boycott of the Muslim community. In his inflammatory speech, Rane referred to Muslims as "green snakes" and alleged a widespread conspiracy of "Jihad" in every aspect of life—including "Love Jihad," "Land Jihad," and "Corporate Jihad."

Rane openly encouraged social segregation and economic exclusion, an anti-Constitutional move that violates Articles 14, 15, and 21 of the Constitution. By instructing the audience to only provide jobs to Hindus and only purchase from Hindu-owned shops, he incites systemic discrimination. These dangerous narratives fuel communal hatred and further polarise Indian society. Rane's rhetoric, delivered in his capacity as a public figure, holds the potential to incite hatred and discord between religious communities. His words are not only a blatant violation of constitutional values

but also a direct threat to the communal harmony that is essential for the well-being of our diverse nation.

As an organisation promoting communal harmony, we are compelled to inquire whether appropriate action is being taken in accordance with the directives issued by the Hon'ble Supreme Court and the Bombay High Court. The Constitutional Courts have specifically ordered detailed investigations and prosecutions in relation to hate speech, and we urge the authorities to adhere to these directions, ensuring that such divisive rhetoric does not go unchecked.

In this context, we bring to your attention the disturbing video of Rane's speech, which seeks to justify extreme social and economic exclusion under the guise of religion. It is crucial that the police and authorities take stringent action to prevent further harm to the peace and harmony of our nation. Such unchecked hate-driven rhetoric threatens to shrink the secular fabric of our country.

Nitesh Rane's speech exhibits clear traits of hate speech, aimed specifically at the Muslim community. This speech propagates communal narratives designed to incite fear and promote division. The speech targets a specific religious group, portraying them as internal enemies or "snakes" that must be suppressed. In doing so, Rane's rhetoric falls squarely within the definition of hate speech, as per the Supreme Court's judgment in *Amish Devgan v. Union of India* (2021).

Rane's public influence and responsibility

As a sitting MLA, Nitesh Rane holds significant influence over the public, which magnifies the harm caused by his words. His position of power makes it especially irresponsible for him to engage in spreading such dangerous rhetoric. His remarks are not those of an ordinary individual but come from a person holding a constitutional office, who is expected to uphold values of inclusivity and equality. The Supreme Court, in its judgment, specifically warned against speech that exploits the influence of individuals in power to spread hatred. Rane's speech, therefore, exemplifies the kind of harmful rhetoric the Court cautioned against.

We urge the authorities to take swift action to investigate these remarks under the relevant provisions of the Bharatiya Nyaya Sanhita, 2023. The law provides for criminal consequences for hate speech, including the promotion of enmity and incitement to hatred. Immediate steps must be taken to hold him accountable, in line with the Supreme Court's ruling, to protect the dignity of individuals and uphold the unity of the country.

Transcript and English Translation of the Speech

Location: Chandivali, Mumbai, Maharashtra [Date: May 3, 2026]

"[They] should come to Maharashtra. This writhing of green snakes (referring to Muslims) must stop. That is why the saffron flag has been unfurled in Maharashtra, remember this. That is why the saffron flag has been unfurled."

"And therefore, while moving around as a Hindu, do so with self-confidence. Move with courage. If any green snake is writhing here, take guidance from Tai (referring to a female leader present) and then give me a call."

(Crowd chants "Jay Shri Ram") "Muley saheb, a very good program happened there today, now tell me what is next. Then it will be my turn."

"Why should we tolerate [this]? We live in a Hindu nation (Hindu Rashtra), don't we? We do not live in some Islamic nation or Christian nation. A country where 90% are Hindus, we call it a Hindu Rashtra. We call it a Hindu Rashtra."

"We don't need anyone's certificate. Some of my journalist friends ask about incidents of religious conversion and 'Love Jihad' happening in the country. And my Hindutvawadi workers go there, oppose them, and stop them. Just now I was told that some people are even ready for Ghar Wapsi (re-conversion to Hinduism)."

"Sometimes I want to ask a question to the Hindu community here: have you ever heard of a Muslim voluntarily accepting Hindutva? Accepting the Hindu religion? Have you ever heard that?"

"Don't those people have poverty? Doesn't anyone in their house fall ill? Don't they have stomach aches? These worthless people do Jihad in everything. 'Love Jihad,' 'Land Jihad,' 'Halal Jihad,' 'Corporate Jihad'... they are born only for Jihad from the moment they wake up."

"From the first breath in the morning to the last breath, they do nothing but Jihad. Under 'Ghazwa-e-Hind,' these people want to make our nation an Islamic nation by 2047. For that, targeting Hindus day and night, doing Jihad, reducing the Hindu population by any means, and making this nation an Islamic nation—these are their plans."

"Only by coming together as Hindus can we thwart them; this is the message you should take from this Hindu convention. Otherwise, if we cannot stop their writhing, and if their numbers increase against us tomorrow, they won't even let you perform puja in your own home. Keep this in mind and understand this stance. Keep this perspective in front of your eyes."

"You won't be able to perform puja in your home. This saffron flag won't be able to fly here. You won't be able to apply the Tilak on your forehead. Mothers and sisters won't be able to apply vermilion (Sindoor) on their heads. These people are bringing this situation to our country."

"Look at what happened in Palghar. Those people didn't ask the caste. They didn't ask the name. [They said] 'Is he a Hindu? Shoot him.' That's all they saw. 'Is there vermilion on the mother's or sister's bead? Shoot them, finish them.' That's all they said."

"Look at that Nawanagar Virar Road. That worthless Jihadi says 'Read the Kalma' first. Because he didn't read the Kalma, they used a razor on him. That is why they used a razor."

"So, when we are dealing with them, buying from them, or giving them jobs—first, if someone is sitting at a shop, even if the shop's signboard says 'Jay Shri Ram,' sometimes Abdul is sitting inside. First tell him, 'Recite the Hanuman Chalisa for me first.' If you recite the Hanuman Chalisa only then will I buy from you, otherwise I won't, I will go to the next shop. See how they fall in line."

"Because all the money these people collect, they use every bit of it for Jihad—understand this and behave accordingly. They use it entirely for Jihad. They have no other work. Therefore, if jobs are to be given or purchases are to be made, it should only be for Hindus—this should be the stance of all of us. Otherwise, look at what happened in TCS Nashik. That Hida Khan, whoever she is, will be found somewhere; she won't go far."

[Time Stamp: 00:01 – 04:18]

Link: <https://t.me/hindutvawatchin/4399>

How elements in the speech delivered constitute Hate Speech

Dehumanisation through "Snake" imagery and malicious slurs: The speaker repeatedly employs the dehumanising term "green snakes" (*hara saanp*) to describe the Muslim community. By comparing a specific religious group to venomous reptiles that are "writhing," the speaker strips them of their human dignity and portrays them as a biological threat that needs to be "stopped" or crushed. Such animalistic comparisons are a classic precursor to communal violence, designed to provoke visceral disgust and justify aggression among the listeners.

Declaration of unconstitutional "Hindu Rashtra" and alienation: In his speech, the speaker makes a highly inflammatory and anti-constitutional claim: "We live in a Hindu nation (Hindu Rashtra), don't we? ... A country where 90% are Hindus, we call it a Hindu Rashtra." This statement fabricates a narrative that excludes and alienates non-Hindus. The allegation that India is exclusively a "Hindu Rashtra" is completely unfounded in law and contradicts the secular fabric of the Constitution. By presenting an unconstitutional majoritarian binary as truth, the speaker aims to create fear and division, portraying the minority community as an obstacle to the nation's identity.

Call for economic boycott and social apartheid: The speaker explicitly incites an economic boycott, instructing the crowd that "purchases should only be made for Hindus" and "jobs should only be given to Hindus." This is a direct attack on the right to livelihood and an attempt to enforce systemic financial strangulation of the minority community. By advocating for a state where economic transactions are dictated by religious identity, the speaker promotes a form of social apartheid that is fundamentally anti-democratic.

Propagation of malicious conspiracy theories: The speaker utilises the "Jihad" suffix to criminalise ordinary existence, alleging the presence of "Love Jihad," "Land Jihad," "Halal Jihad," and "Corporate Jihad." He further invokes the "Ghazwa-e-Hind 2047" conspiracy to manufacture existential fear, claiming that Muslims are "born only for Jihad from the moment they wake up." These narratives serve no purpose other than to characterise an entire religious group as inherently criminal and conspiratorial, thereby justifying "pre-emptive" hostility and systemic persecution.

Intimidation and provocation of shopkeepers: The speaker encourages a "litmus test" for Muslim shopkeepers, demanding that the audience tell them: "Recite the Hanuman Chalisa for me first... only then will I buy from you." This is a deliberate act of religious intimidation designed to humiliate individuals in their places of work. It asserts aggressive majoritarian dominance over every day commercial interactions, reducing minority citizens to a subjugated status and inviting a breach of public peace.

Intimidation utilising political power: The speaker explicitly leverages his position and the influence of the state, stating that if any "snake is writhing," the audience should "give me a call." This is a clear threat implying that the state apparatus or his political office is aligned against the minority community and will support extra-judicial actions. By encouraging citizens to believe they

have the backing of a "Hindutva ideology" government for exclusionary acts, the speaker fosters a climate of impunity for vigilantism.

Violation of constitutional values

The Supreme Court ruling in *Amish Degan v. Union of India (2021)* provides the crucial distinction between the speech of a public figure and an ordinary citizen. As a sitting MLA, Rane's words carry the weight of his office and can influence large sections of the population. His role in disseminating dehumanising slurs, calling for economic boycotts, and manufacturing "Jihad" narratives cannot be overlooked. Such rhetoric directly threatens the communal harmony, equality, and fraternity essential for the country's well-being.

A clear case of hate speech

The speech delivered in Chandivali is a textbook example of hate speech. Through dehumanisation, calls for economic boycott, political intimidation, and the propagation of malicious conspiracies, the speaker incites fear and hostility. These statements violate the core principles of secularism and justice enshrined in the Indian Constitution and encourage discriminatory actions that threaten public harmony.

Failure to uphold duty of responsibility

Nitesh Rane's speech represents a direct violation of his duty as a public figure. The Supreme Court has emphasised that individuals with substantial influence must exercise heightened responsibility, as their words can stir public sentiments and foster division. Rane's rhetoric, filled with violent metaphors and calls for segregation, shows a blatant disregard for this responsibility and an intentional effort to deepen societal rifts.

Profile of Nitesh Rane

CJP, through a series of complaints dated March 7, March 18, and March 28, 2025, has raised serious objections to multiple speeches delivered by Nitesh Rane across Sindhudurg, Pune, and Ratnagiri districts. These complaints pertain to events such as the "Hindu Rashtra Adhiveshan" in Kundal (February 8, 2025), the "Shivjanmostav" event in Sawantwadi (February 19, 2025), a public felicitation at Nanijdham, Ratnagiri (February 20, 2025), and a religious gathering at Wagholi, Pune (February 5, 2025). CJP has alleged that across these events, Rane repeatedly invoked conspiratorial terms like "love jihad" and "land jihad," portrayed Muslims as a collective threat, and made statements that could incite hostility, social boycott, and fear among communities. The complaints emphasise that such rhetoric, especially from a sitting Cabinet Minister, is unsubstantiated, inflammatory, and violative of constitutional guarantees, and therefore warrant immediate registration of FIRs and prompt legal intervention by the concerned authorities.

FIRs and ongoing legal scrutiny against Nitesh Rane

Under the judicial oversight of the Bombay High Court in *Aftab Siddique & Ors. v. The State of Maharashtra (2024)*, a series of First Information Reports (FIRs) were formally documented

against BJP MLA and Cabinet Minister Nitesh Rane. These legal actions follow a consistent pattern of alleged hate speech and inflammatory remarks made across various regions of Maharashtra. The High Court's proceedings specifically highlighted four primary cases where the police were directed to take action for violations of the Indian Penal Code (IPC) involving the promotion of religious enmity and criminal intimidation.

Mankhurd Police Station (C.R. No. 152/2024): Registered against Nitesh Rane under Sections 153A (promoting enmity between groups), 503 (criminal intimidation), 504 (intentional insult), and 505 (statements conducing to public mischief) of the IPC. This case originated from speeches perceived as threatening to the Muslim community and inciting public disorder.

Ghatkopar Police Station (C.R. No. 521/2024): Registered against Nitesh Rane and Subhash Ahir under Sections 153A, 504, 506 (punishment for criminal intimidation), and 188 (disobedience to order duly promulgated by public servant) of the IPC. These charges relate to inflammatory addresses delivered in the Mumbai suburbs.

Kashimira Police Station (C.R. No. 259/2024): Registered against Nitesh Rane and Smt. Geeta Jain regarding the Mira-Bhayander incidents. The FIR invokes Sections 153A, 153B (imputations prejudicial to national integration), 143 (unlawful assembly), 504, and 506 of the IPC, alongside Section 37(1) read with Section 135 of the Maharashtra Police Act. These charges followed high-tension rallies and subsequent communal friction in the Mira Road area.

Malwani Police Station (C.R. No. 298/2024): Originally registered against Bhagwan Thakur, Nitesh Rane was subsequently added as an accused by the Malwani Police. The invoked sections include 153A, 504, and 506 of the IPC, centered on remarks made during public gatherings that targeted specific religious demographics.

Beyond these specific orders, Nitesh Narayan Rane's October 2024 election affidavit discloses a total of 38 FIRs registered against him, of which 20 pertain specifically to allegations of hate speech.

Recent Directions of the Supreme Court on preventing/prosecuting hate speakers in Maharashtra

As you must know, the issue of rampant hate speech being delivered and the inaction by law enforcement agencies has been highlighted before the Supreme Court multiple times since 2023. We would like to highlight that on February 3, 2023, the Supreme Court issued directions with respect to an event which was scheduled to be held in Mumbai on February 5, 2023 by the Sakal Hindu Samaj, another extremist fringe Hindutva group. The petitioner, Shaheen Abdullah, had contended that similar to its anti-Muslim speech during 'Hindu Jan Aakrosh Morcha' held in Mumbai on January 29, it can be apprehended that the same will be repeated during the February 5 meeting as well. The apex court had thus sought a video of the entire event to be scrutinised by the court at the next hearing. The court has also taken an undertaking from the government of Maharashtra that if permission for this event is granted "it will be subject to the condition that nobody will make any hate speech and in defiance of law or disturbing the public order."

The court also outlined directives with respect to taking preventive action in such cases:

“We also direct that the Officer(s), in case, permission is granted and, in case, the occasion arises for invoking the power under Section 151 of Cr.P.C. as aforesaid, it shall be the duty of the Officer(s) concerned to invoke the said power and to act as per the mandate of Section 151 of the Cr.P.C.”

Even in 2024 itself, while on January 17, the Supreme Court bench of Justices Sanjiv Khanna and Dipankar Datta had expressed their anguish at the petitioners being forced to approach the Supreme Court multiple times against individuals and organisations even after there being guidelines for tacking and taking action against hate speeches. During the said hearing, the Supreme Court issued an order directing the District Magistrate and Superintendent of Police at Yavatmal, Maharashtra and Raipur, Chhattisgarh to take ‘appropriate steps’ to ensure that no incitement to hate speech occurs at the rallies scheduled in the said districts in the coming few days of January. The said order was passed following the concerns raised by the petitioners over delivery of potential hate speeches at rallies planned by Hindu Janjagruti Samiti and Bharatiya Janata Party legislator T Raja Singh in the month of January.

The court had outlined directives with respect to taking preventive action in such cases:

“We would require the authorities to be conscious that no incitement to violence and hate speech are permissible. The concerned District Magistrates and Superintendent of Police of Yavatmal, Maharashtra and Raipur, Chhattisgarh will take necessary steps, as may be required. If necessary and deemed appropriate, police/ administration will install CCTV Cameras having recording facility, so as to ensure identification of the perpetrators in the event of any violence/hate speech.”

Circulars issued by DGP Maharashtra in February 2023 and May 2023 urging strict action on Hate Speech

In Circular No. DGP 20/ Petition No.940/ 2022/54.2023. issued by Dr Suhas Warke (Spl. Inspector General of Police (L&O) for The Director General of Police M.S., Mumbai), dated February 2, 2023, the Supreme Court order dated January 13, 2023 has been highlighted where the court had asked the police to ensure that as and when any speech which attracts offences such as Sections 153A, 153B and 295A and 505 of the IPC take place, suo moto action is taken if no complaint is forthcoming.

The circular had directed all Unit Commanders to follow the Supreme Court order.

The Circular No. DGP/20/Petition No. 940-2022/54/2023 issued by Dr Suhas Warke (Spl. Inspector General of Police (L&O) for The Director General of Police M.S., Mumbai), dated April 3, 2023, entails “measures to be taken to maintain law and order due to agitations, *morchas*, speeches etc.”

It gives detailed instructions on what steps are to be taken when any *morchas* are to be held:

2. All the Unit Commanders should hold a meeting with the concerned organisers before such a *morcha* and fix the route of the *morcha* with appropriate terms and condition. A combined meeting of all social groups should be taken to convey clearly to all that they should maintain peace and keep law and order during the *morcha*. Preventive action against Anti-social elements should be taken. Those elements who help in maintaining peace and harmony should be encouraged. Audio

Video recording of the *morcha* should be done. Police Head Quarters should ensure adequate supply of equipment's, like Lathi, Helmets, etc. to police men deployed for *morcha bandobast*. If any law-and-order situation arises, offences should be registered immediately and arrest should be made. Intelligence machinery should be activated to collect advance information about *morcha*, agitation and efforts should be made to pre-empt any communal incidents.

Action taken against hate speakers and offenders

Sir, it is also important to note that the Hon'ble Supreme Court of India, in Writ Petition (Civil) No. 940/2022, *Shaheen Abdulla vs. Union of India & Ors.*, mandated the police authorities in the States of Uttar Pradesh, Uttarakhand and UT of NCT of Delhi to take suo moto action against those indulging in hate speeches as provided under the Indian Penal Code. Moreover, the state authorities have also been asked to issue directions to their subordinates in this regard that without looking at the religion of the accused, action has to be taken. In its order, the Supreme Court bench comprising Justices KM Joseph and BV Nagarathna had said the following:

"Respondents (states) shall ensure that immediately, as and when any speech or any action takes place which attracts offences such as Section 153A, 153B, 295A and 506 of IPC etc, without any complaint being filed suo moto action be taken to register cases and proceed against the offenders in accordance with law. Respondents will issue directions to the subordinates so that appropriate action can be taken at the earliest. We further make it clear that such action be taken irrespective of the religion of the maker of the speech, so that the secular character of Bharat as envisaged by the Preamble is preserved."

The apex court has, thus, again outlined already codified statutory duties of a police officer which makes it mandatory for them to take action under section 151 of CrPC in case there is apprehension of hate speech. Sir, given the well-orchestrated and numerous instances of hate speech and actual hate crimes being committed, the minority community in various parts of India already feels insecure and threatened. Furthermore, this was spoken at a public event and this speech has reached not only the audience at the event but also all those who may have seen these videos on their mobile phones, by the medium of social media. How large and wide the reach of social media can be, we are sure you must be aware. The consequences of such an inflammatory speech could have been worse.

Laws violated by the Hate Speech

Under Bharatiya Nyaya Sanhita, 2023 (BNS)

The speech delivered in Chandivali, Mumbai, Maharashtra on May 3, 2026, constitutes a clear violation of the Bharatiya Nyaya Sanhita (BNS), 2023, through the promotion of violent, exclusionary, and malicious narratives. The speaker's deliberate use of dehumanising metaphors, economic boycotts, and conspiracy theories is intended to provoke enmity between communities and incite a communal divide.

Section 196 – Promoting Enmity Between Groups

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

- In the speech delivered, the speaker refers to the Muslim community as "green snakes" and describes their presence as a "writhing" that must be stopped. The unconstitutional claim that the region is an exclusive "Hindu Rashtra" fosters division and hostility.
- By asserting that "these people are bringing this situation to our country" and labeling them as "worthless jihadis," the speaker creates an atmosphere of mistrust and fear, directly breaching the law against promoting enmity.

Section 197 (1) – Imputations Against Allegiance to the Constitution

Whoever, by words either spoken or written or by signs or by visible representations or through electronic communication or otherwise, — (a) makes or publishes any imputation that any class of persons cannot, by reason of their being members of any religious, racial, language or regional group or caste or community, bear true faith and allegiance to the Constitution of India as by law established or uphold the sovereignty and integrity of India.

- The speech claims that under "Ghazwa-e-Hind," the minority community intends to make India an "Islamic nation by 2047." This implies that the community cannot bear true faith to the Constitution, violating Section 197.
- The speaker's portrayal of the nation as an exclusive "Hindu Rashtra" where others are seen as "targeting Hindus day and night" attacks the core secular tenets and pluralistic nature of the Constitution.

Section 299 & Section 302 – Malicious Act to Insult a Religion / Wounding Religious Feelings

Section 299: Deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs.

Section 302: Uttering words, etc., with deliberate intent to wound religious feelings of any person.

- The speaker maliciously targets the Islamic faith by assigning the suffix "Jihad" to various socio-economic activities ("Love Jihad," "Land Jihad," "Halal Jihad," "Corporate Jihad").
- The demand that individuals like "Abdul" must "Recite the Hanuman Chalisa" as a prerequisite for business is designed to insult and humiliate the community based on their religious identity.

Section 352 – Intentional Insult with Intent to Provoke Breach of Peace

Whoever intentionally insults in any manner, and thereby gives provocation to any person, intending or knowing it to be likely that such provocation will cause him to break the public peace, or to commit any other offence.

- The speech is designed to provoke fear by suggesting that "if their numbers increase... they won't even let you perform puja in your own home."
- The inflammatory language—including the directive to "take guidance" and "give me a call" regarding "writhing snakes"—could easily provoke a physical clash or communal enmity, disturbing public order.

Section 353 – False Information with Intent to Incite

(1) Whoever makes, publishes or circulates any statement, false information, rumour, or report—
(b) with intent to cause, or which is likely to cause, fear or alarm to the public... (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.

- The speaker spreads the inflammatory and unsubstantiated claim that "all the money these people collect, they use every bit of it for Jihad." This is intentionally spread to create alarm and induce the public to commit economic or social offenses against a specific community.
- The call for an economic boycott ("purchases... should only be for Hindus") is intended to incite communal dominance and alarm within the public, leading to social unrest.

The inflammatory and divisive speech delivered by Nitesh Rane amounts to insightful hate speech. Through the use of dehumanising labels, false historical/future narratives (Ghazwa-e-Hind 2047), and direct calls for discriminatory economic practices, the speaker has committed multiple punishable offenses under the Bharatiya Nyaya Sanhita (BNS), 2023.

These acts are prejudicial to the maintenance of harmony and are intended to wound the religious feelings of a specific class of citizens while undermining the sovereignty of the Indian Constitution.

Judicial precedents against Hate Speech:

In *Firoz Iqbal Khan vs Union of India [W. P (Civ.) No. 956 of 2020]*, the Supreme Court had held, "the edifice of a democratic society committed to the rule of law under a regime of constitutional rights, values and duties is founded on the co-existence of communities. India is a melting pot of civilisations, cultures, religions and languages. Any attempt to vilify a religious community must be viewed with grave disfavour by this Court as the custodian of constitutional values." (Para 11).

In *Pravasi Bhalai Sangathan v. Union of India, (Ref: AIR 2014 SC 1591)*, the Supreme Court has 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. Therefore, the aforementioned news items are tantamount to the perpetration of genocide, and must be considered to be in violation of Article 21 of the Constitution." (Para 7).

On April 28, 2023, the division bench of Justice KM Joseph and BV Nagarathna in *Ashwini Kumar Upadhyay v. Union of India [W.P. (C) No. 943 of 2021]*, extended its order and directed all States/UTs to register Suo moto FIR against Hate Speech irrespective of religion. The court added that when

any speech or any action takes place which attracts offences such as Section 153A, 153B and 295A and 505 of the IPC etc., suo moto action will be taken to register cases even if no complaint is forthcoming and proceed against the offenders in accordance with law.

In view of the above, we urge you to take cognizance of the speech delivered by Nitesh Rane in Chandivali, Mumbai on May 3, 2026, as enclosed herewith, and register a case against the perpetrator, Nitesh Rane, as well as the organisers of the event, under the relevant sections of the Bharatiya Nyaya Sanhita (BNS), 2023 for cognizable offences.

The inflammatory content—including the dehumanisation of the minority community as "green snakes," the incitement of economic boycotts, and the spreading of conspiracy theories regarding "Ghazwa-e-Hind" and "Jihad"—clearly necessitates immediate legal intervention to prevent further communal unrest. We also wish for you to inform us whether the said event was videotaped by police officials, as per the orders of the Supreme Court of India. Additionally, we request that the Saki Naka/Chandivali police authorities keep us informed of developments and actions taken in this case, based on the applicable sections, as this would go a long way in rebuilding faith and confidence in the rule of law in general, and the police-citizen relationship in particular.

Sir, do note that we are sending this complaint, by email and registered post, on which we urge you to register an FIR if one has not been filed yet.

In anticipation,

Yours sincerely,

Nandan Maluste, CJP President

Teesta Setalvad, CJP Secretary

Annexures:

Annexure A - Video of event dated May 3, 2026 downloaded by CJP