

Date: July 28, 2026

To,

Shri Nikhil Gupta (IPS)

Additional Director General of Police (ADG) Law & Order, Maharashtra

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Shri Deven Bharti (IPS)

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Subject: Complaint seeking registration of FIR against speaker Pushpendra Kulshreshtha for delivering a divisive hate speech, promoting communal hostility, spreading conspiracy theories against the Muslim community, dismissing secularism, and inciting religious hatred and enmity at "Virat Hindu Sammelan" in Mumbai (Maharashtra) on June 27, 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 statements expressed by serial hate offender Pushpendra Kulshreshtha during his speech delivered at a large gathering titled "Virat Hindu Sammelan" in Mumbai, Maharashtra on June 27, 2026. At the event, Pushpendra Kulshreshtha made aggressive claims against Muslims and spread misleading conspiracy theories.

Pushpendra Kulshreshtha openly promoted narratives portraying Muslims as non-legitimate equal citizens while alleging that the idea of equal land rights between Hindus and Muslims is "a lie." Such statements violate the constitutional principles of equality, fraternity, secularism, and dignity enshrined under Articles 14, 15, and 21 of the Constitution of India. By portraying a religious community as historical aggressors and questioning their rights, the speaker fuels prejudice, suspicion, and hostility. These dangerous narratives deepen communal divisions and threaten social harmony. Kulshreshtha's rhetoric, delivered before a large public audience, possesses the potential to incite hatred and discord between religious communities. His words are not merely expressions of opinion but constitute a direct attack on the secular and pluralistic foundations of the Republic.

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 Kulshreshtha's speech, which seeks to dismiss secularism, propagate conspiracy theories, and incite communal sentiment. 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 erode the secular fabric of our country.

Pushpendra Kulshreshtha's speech exhibits clear traits of hate speech, aimed specifically at undermining communal peace and target specific communities. The speech propagates communal narratives designed to generate fear, suspicion, and hostility. In doing so, Kulshreshtha's rhetoric falls squarely within the definition of hate speech as recognised by the Supreme Court in *Amish Dergan v. Union of India* (2021) 1 SCC 1.

We urge the authorities to take forthwith action to investigate these remarks under the relevant provisions of the Bharatiya Nyaya Sanhita, 2023. The law provides 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 rulings, to protect the dignity of individuals and uphold communal harmony.

Transcript and English translation of the speech:

Location: Mumbai, Maharashtra

Event: Virat Hindu Sammelan

Date: June 27, 2026

"Whatever lie we tell, people accept it as the truth. We have told such big lies. And those who claim 24 hours a day to be working for Hindutva, they tell the biggest lies of all. Neither do they feel any shame, nor do they feel any obligation to even find out what they are actually saying. From morning till evening, using absurd and twisted words, making people applaud, they are simply running a business and doing nothing else.

In this country, in every lane, there are two Hindu organisations. Every man is fighting the battle of Hindutva. But out of 82 crore Hindus, the maximum number of silent tears are ours, and nobody is dying [fighting]. Because we...

But this has been going on relentlessly. 'As much as the land of Bharat belongs to Hindus, it equally belongs to Muslims'—was this remembered in 2026? Before this, was it not remembered?

Therefore, anything that you say out of your own mind has become the standard today. Hiding your own thieves, hiding the cunningness of your own thieves, and talking at length about others—whereas what they are doing, they have been doing for a thousand years and have never hidden it like you do. What we are doing and what we should be doing, nobody tells us. Different stories, different talks are going on.

'India is secular'—from morning till evening, those who define secularism, those who do the drama of 'all religions are equal'—they neither define religion nor anything else; they just create their own rote definition and promote it.

On the very first page... inside Banaras, the place which some people till recently, some supreme fools used to call the 'Gyanvapi Mosque'... 'Gyan' and 'Vyapi'—neither of these words has any relation to a mosque! Behind that very Gyanvapi, there is a 450-year-old Shivling, and that same Shivling was drawn on the very first page of the Constitution of India.

In that very Constitution, the images of Mother Sita, Laksbman, and Ram are drawn on page number 5. In that same Constitution, there is Jain philosophy, Buddhist philosophy, Subhash Chandra Bose, and the picture of Maharashtra's greatest hero, Chhatrapati Shivaji Maharaj. In total, 22 illustrations are included in it.

You neither know when they were included, nor do you know when they were removed. So when there is half-baked knowledge, you speak your incomplete thoughts in public, which people fail to understand. And when these illustrations were placed, at that time in the Constituent Assembly, not a single person was from RSS, Vishwa Hindu Parishad, or Bajrang Dal. They had no connection to these thoughts whatsoever. Everyone there was a Congressman.

Now this was created and put into effect. But nobody tried to ask: how did these pictures suddenly disappear from inside the Constitution after a few days? We never discussed this because we...

There was only one religion, there is only one religion, and there will only be one religion—its name is Sanatan! Sanatan is not dependent on any ritual or worship... And in the entire country, the offerings made at Hindu temples—the government does not take money from mazar, nor from gurdwaras, nor from churches, but in a secular state, the government takes the offerings of temples! I am saying this out of my own grief...

In 10 years, the government formed a committee. My question was: why is money taken from Hindu temples in secular India? Are there not 10 honest people among Hindus who can manage the ₹10 lakh crore that comes annually to temples? If 10–15 lakh honest people are found and that money goes to them... Stand them at every crossroads and whoever has stolen even ₹1 to ₹200 crore from the Ram Temple should be shot dead publicly!"

[Time Stamp: 00:00 – 04:35]

Link: <https://t.me/hindutvawatchin/4795>

How elements in the speech delivered constitute Hate Speech

The speaker explicitly attacks the core democratic premise of equal rights, mocking the assertion that India belongs equally to Muslims and Hindus. Portraying Muslims' presence and rights as an unacceptable concession fosters discrimination and social exclusion. The speaker ridicules the constitutional mandate of secularism and the principle of *Sarva Dharma Sambhava* ("all religions are equal"), characterising them as "drama" and deceptive. This undermines public trust in the secular framework guaranteed by the Constitution of India.

Provocative claims on religious disputes (Gyanvapi Mosque):

By making aggressive assertions regarding the Gyanvapi Mosque, calling those who refer to it as a mosque "supreme fools," and making unsubstantiated claims regarding historical and constitutional depictions, the speaker deliberately inflames religious sentiments surrounding sensitive, ongoing legal and social disputes. The assertion that "there was only one religion, there is only one religion, and there will only be one religion—its name is Sanatan" explicitly denies the

validity and equal standing of other religious faiths in India, encouraging religious intolerance and majoritarian hegemony.

The speaker uses extreme language calling for public executions ("should be shot dead publicly"), which inflames public passions, creates an atmosphere of fear, and incites lawlessness and violence.

Violation of constitutional values:

The Supreme Court ruling in *Amish Deygan v. Union of India* (2021) provides the crucial distinction between the speech of a public figure and that of an ordinary citizen. As a public speaker addressing a large gathering, Pushpendra Kulshreshtha's words carry significant influence and can shape public opinion. His dissemination of divisive narratives, dismissal of secularism, and inflammatory rhetoric directly threaten communal harmony, equality, and fraternity guaranteed under Articles 14, 15, and 21 of the Constitution.

A clear case of hate speech

The speech delivered at the "Virat Hindu Sammelan" in Mumbai is a textbook example of hate speech. Through religious stereotyping, majoritarian alarmism, historical revisionism, rejection of secular principles, and violent rhetoric, the speaker incites hostility against minority communities. These statements violate the core constitutional principles of secularism, equality, and fraternity and encourage discriminatory attitudes that threaten public harmony.

Pushpendra Kulshreshtha's speech represents a direct violation of the heightened duty of responsibility expected from influential public figures. The Supreme Court has consistently emphasised that individuals with substantial influence must exercise restraint because their words can inflame passions and deepen social divisions. Kulshreshtha's remarks demonstrate a reckless disregard for these responsibilities and contribute to the normalisation of prejudice.

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 Mumbai, Maharashtra on June 27, 2026, constitutes a clear violation of the Bharatiya Nyaya Sanhita (BNS), 2023, through the promotion of exclusionary, divisive, and malicious communal narratives.

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, the speaker denies equal land rights to Muslims and attacks secular co-existence, fostering hostility and division between religious communities.

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

Making or publishing imputations that any class of persons cannot bear true faith and allegiance to the Constitution of India or uphold the sovereignty and integrity of India.

- The speaker attacks the constitutional framework, ridicules secularism, and questions the citizenship rights of minority groups, striking at the core secular framework of the Constitution.

Section 299 & Section 302 – Deliberate Acts to Insult Religion / Wounding Religious Feelings:

Section 299 penalises deliberate and malicious acts intended to outrage religious feelings; Section 302 penalises uttering words with deliberate intent to wound religious feelings.

- The speaker makes provocative claims regarding religious places (Gyanvapi Mosque) and asserts exclusive religious supremacy, insulting other religious identities.

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

Intentionally insulting and giving provocation to cause breach of public peace.

- The inflammatory language and violent calls ("should be shot dead publicly") are intended to incite provocation, disturb public peace, and encourage lawlessness.

Section 353 – False Information / Incitement to Offence:

Publishing or circulating statements with intent to cause fear/alarm or incite one community against another.

- The speaker spreads inflammatory narratives mocking secularism and equal rights, creating fear and inciting communal hostility.

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 Pushpendra Kulshreshtha at the "Virat Hindu Sammelan" in Mumbai, Maharashtra on June 27, 2026, as enclosed herewith, and register a case against the perpetrator, Pushpendra Kulshreshtha, 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 rejection of secularism, denial of equal rights, provocative claims on religious places, and explicit calls to violence—clearly necessitates immediate legal intervention to prevent further communal unrest. We also request to be informed whether the event was videotaped by police officials as per Supreme Court directions, and that authorities keep us updated on actions taken.

Sir, do note that we are sending this complaint by email and registered post, on which we urge you to register an FIR forthwith.

In anticipation,

Yours sincerely,

Nandan Maluste, *CJP President*

Teesta Setalvad, *CJP Secretary*

Annexures:

Annexure A – Video of event dated June 27, 2026 downloaded by CJP