

Date: July 31, 2026

To,

**Shri Nikhil Gupta (IPS)**

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

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Subject: Complaint seeking registration of FIR against BJP MLA Gopichand Padalkar and Dr. Dhavalsinh Mohite-Patil for delivering hate speech, promoting religious enmity, using derogatory slurs against the Muslim community, advocating extra-constitutional violence, and inciting communal hostility during the "Hindu Jan Akrosh Morcha" held at Georai, Beed, Maharashtra on June 19, 2026.

Dear Sir,

We, at Citizens for Justice and Peace (CJP), a human rights movement dedicated to furthering the constitutional rights of all Indians, write to seek the immediate registration of a First Information Report (FIR) against BJP MLA Gopichand Padalkar and Dr. Dhavalsinh Mohite-Patil for delivering inflammatory and communal speeches during the "Hindu Jan Akrosh Morcha" organised by Sakal Hindu Samaj at Georai, Beed district, Maharashtra, on June 19, 2026.

During the gathering, both speakers repeatedly targeted the Muslim community through false and inflammatory allegations, derogatory references, conspiracy theories, and open calls for discriminatory and violent action. The speeches portrayed Muslims as unlawful encroachers on public and temple lands, accused them of orchestrating fabricated conspiracies such as "Land Jihad", "Love Jihad", "Juice Jihad", and "Corporate Jihad", demanded demolition of mosques and other places of worship allegedly situated on government land, and called for erasing village names associated with Muslim rulers on the ground that they represented "remnants" of historical oppression.

The speaker Dr. Dhavalsinh Mohite-Patil stated that anyone looking at "our motherland or religion with an evil eye" would first have "their eyes gouged out" and "only then will we look at the

Constitution." He further asserted that because "these people" allegedly do not respect the Constitution, justice through constitutional means was impossible. Such statements openly advocate vigilantism, encourage extra-judicial violence, and undermine public confidence in constitutional institutions and lawful processes.

These speeches were delivered before a large public gathering by influential political figures holding significant public office and influence. The dissemination of such communal narratives by elected representatives carries a heightened capacity to inflame passions, reinforce prejudice, deepen social divisions, and disturb public order. Rather than constituting protected political expression, the speeches deliberately vilify an identifiable religious community, portray its members as demographic, cultural, and territorial threats, and encourage collective hostility against them.

The speeches therefore constitute a direct assault on the constitutional values of equality, fraternity, secularism, dignity, and the rule of law guaranteed under Articles 14, 15, 19, 21, 25 and the constitutional vision embodied in the Preamble. By constructing Muslims as enemies of society, questioning their legitimacy within the constitutional order, and calling for discriminatory state action and extra-legal violence, the speakers seek to normalise exclusion, hatred, and communal polarisation.

The Hon'ble Supreme Court has repeatedly recognised that hate speech delivered by persons occupying positions of influence carries a far greater potential to incite discrimination and violence. In *Amish Devgan v. Union of India*, (2021) 1 SCC 1, the Court held that speech which promotes hatred, discrimination, or hostility against protected groups falls outside constitutional protection and undermines fraternity and constitutional morality.

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: Georai, Beed, Maharashtra/Date: June 19, 2026]

*"When we visited that village, we found total encroachment. That mosque was built right on the road. Our request and challenge to the police administration is this: if any place of worship has been built on government land, it must first be demolished, and a bulldozer must be run over it!"*

*Over there, the land belongs to the Maruti (Hanuman) temple, and that land has been usurped. In that very place, there is four and a half acres of land belonging to Goddess Lakshmi, and that land has also been grabbed.*

*What are you waiting for? Revenue administration and police administration?*

*We wrote a letter to the Honorable Chief Minister and a letter to the Honorable Minister of the Rural Development Department, stating that Maharaj's (Chhatrapati Shivaji Maharaj) name cannot be associated with the Nijampur*

*Gram Panchayat. Since our government works on the ideals of Chhatrapati Shivaji Maharaj, the name of that Gram Panchayat was changed to Raigadwadi within 17 days!*

*And that is why I want to request you all. Why am I telling you this? Because in Beed district, there are villages that bear the signs of Mughal rule—Imampur, Aurangpur Kukda... Ah, even after Aurangzeb has passed, why is there still an Aurangpur Kukda here? Shahjahanpur, Umrud Khurd, Dari Shahjahanpur, Sultanpur...*

*Wipe out these names now! Find out what their original names were.*

*Over in Pakistan, two months ago, a provincial government took the stance that Lahore should be renamed Krishnanagar. I am not talking about here, but about Pakistan! The government there is saying that Lahore's original name was Krishnanagar, so change it back to Krishnanagar.*

*We do not want the remnants of those who inflicted injustice and atrocities upon us and attacked our religion.*

*Land Jihad, Love Jihad, Juice Jihad—you see all of this in the media—Corporate Jihad. Our educated daughters working in big companies are also being targeted. People might think this is just random talk, but it is not. This is a matter that goes beyond politics. Understand this clearly, Hindus!*

*Look at the situation in the country today. In Jammu and Kashmir, where Muslims were once a small percentage, now only a small percentage of Hindus remain. Look at the situation in Northeast India—Manipur is in constant conflict. Why? Because large-scale religious conversions took place there. Meghalaya, Manipur, Arunachal Pradesh, Sikkim—look at all these states, they have mostly converted. Look at the situation in Kerala, look at the situation in Tamil Nadu.*

*When our government came to power in West Bengal, all the trains were packed. Where did they go? The people from West Bengal were Bangladeshis; some went back to Bangladesh, and where did the others go? Karnataka! Where did some go? Telangana! Where did some go? Andhra Pradesh! Why did they go there? Because there is a Congress government there.*

*Look at those reports, I am not just making this up. They know that they will find support there. Who? The Bangladeshi people. Oh brothers..."*

**Dr Dhavalsinh Mohite-Patil [Time Stamp: 3:33 - 4:52]**

*"...is what we get to see.*

*For the sake of a few votes from these people, some political leaders act like puppets, wagging their tails before them (Landi). I want to challenge all those leaders: if you want an role model, look to our leader Mr. Padalkar! If you want an role model, look to our Sangram Bhaiya!*

*If Hindus stand united, then the Hindu community will stand by you. Because it is written in our religion: 'Dharmo Rakshati Rakshitah' (He who protects Dharma is protected by Dharma).*

*The highest place belongs to our mother and father. After that, if anyone looks at our motherland or our religion with an evil eye in the future, we will gouge their eyes out first, and only then will we look at the Constitution!*

*Because if these people do not respect our Constitution... if these people (Landi) do not respect our Constitution, then it becomes very difficult to get justice through the medium of the Constitution and that is why staying united is the need of the hour today. Gathering together and building the strength of Hindus is the need of the hour today.*

*So as I leave, let me say one sentence..."*

**Dr Dhavalsinh Mohite-Patil [Time Stamp: 3:33 - 4:52]**

**Link:** <https://t.me/hindutvawatchin/4762>

### **How the speeches constitute hate speech:**

#### **I. Deliberate targeting of Muslims through false allegations and communal stereotyping**

Throughout his speech, BJP MLA Gopichand Padalkar repeatedly portrays Muslims as unlawful encroachers upon temple properties, public roads, and government land. Without producing any evidence, he asserts that mosques have been illegally constructed over public property and temple lands and publicly challenges the police administration to demolish such places of worship using bulldozers. This rhetoric identifies an entire religious community with criminality and illegality and seeks to legitimise collective punitive action against it.

He further invokes widely circulated but unsubstantiated conspiracy theories such as "Land Jihad," "Love Jihad," "Juice Jihad," and "Corporate Jihad", presenting Muslims as participants in an organised conspiracy to capture land, exploit Hindu women, infiltrate businesses, and undermine Hindu society. These expressions have repeatedly been used in communal mobilisation campaigns to stigmatise Muslims as existential threats. Their invocation before a public gathering serves no legitimate political purpose but instead encourages suspicion, fear, and hostility against an identifiable religious community.

The speaker also makes inflammatory assertions regarding demographic changes in Jammu and Kashmir, Kerala, Tamil Nadu, and the North-East, and falsely links Bangladeshi migration to political parties governing other States. These allegations collectively reinforce the narrative that Muslims and migrants constitute a coordinated demographic and political threat requiring collective resistance. Such rhetoric deliberately amplifies communal anxieties and fosters social exclusion.

#### **II. Calls for discriminatory and extra-legal action against religious places and Muslim identity**

The speeches repeatedly encourage discriminatory state action directed specifically against Muslim religious and cultural identity.

Padalkar publicly demands demolition of mosques allegedly situated upon government land and repeatedly urges the administration to use bulldozers to remove such structures. While framed as an appeal concerning encroachments, the speech selectively targets mosques and Muslim religious sites without any reference to lawful adjudication, judicial determination, or due process. The repeated emphasis upon bulldozer action mirrors a broader pattern of communal rhetoric in which demolition is advocated as a punitive measure against a particular religious community.

The speaker also urges the removal of village names associated with Muslim rulers, describing them as symbols of oppression that must be "wiped out." By demanding the erasure of place names associated with Muslim history solely because of their religious or historical association, the

speech promotes exclusionary nationalism and encourages hostility towards the cultural and historical identity of Indian Muslims.

### **III. Use of derogatory slurs and dehumanising language**

Dr. Dhavalsinh Mohite-Patil repeatedly uses the derogatory expression "Landi" while referring to Muslims during his speech. The repeated use of abusive language directed at an identifiable religious community strips its members of dignity and reinforces prejudice before a public audience.

Hate speech frequently operates through demeaning and dehumanising language intended to portray targeted communities as undeserving of equal respect and constitutional protection. The repeated use of communal slurs in the present speech serves precisely this purpose by reducing Muslims to objects of ridicule and contempt while encouraging listeners to view them as outsiders and adversaries rather than equal citizens.

### **IV. Explicit advocacy of violence and rejection of constitutional governance**

The most problematic portion of the speech occurs when Dr. Mohite-Patil declares:

*"If anyone casts an evil eye on our motherland or our religion, we will gouge out their eyes first, and only then will we look at the Constitution."*

This statement is an unambiguous call for vigilante violence. Rather than encouraging lawful action through constitutional institutions, it openly advocates inflicting physical violence before recognising constitutional authority. Such rhetoric directly encourages individuals to substitute personal vengeance for legal process and legitimises extra-judicial violence against perceived opponents.

The speaker further claims that because "these people" allegedly do not respect the Constitution, justice cannot be secured through constitutional mechanisms. This assertion seeks to delegitimise constitutional governance itself and encourages listeners to abandon lawful institutions in favour of collective retaliation. Such speech undermines public confidence in the rule of law and promotes lawlessness.

### **V. Promotion of religious polarisation and majoritarian mobilisation**

Both speakers repeatedly appeal to religious identity as the primary basis for political mobilisation. References urging Hindus to unite against perceived threats posed by Muslims, combined with repeated allegations of conspiracies and demographic aggression, create a narrative of permanent conflict between religious communities.

The speeches seek to transform ordinary political discourse into communal mobilisation by presenting Muslims collectively as adversaries whose presence, institutions, and historical associations must be resisted, removed, or suppressed. Such rhetoric is intended to deepen divisions between communities rather than address any legitimate public issue.

### **VI. Public office, heightened responsibility, and the law on hate speech**

The impugned speeches were delivered by public figures occupying positions of political influence before a substantial public gathering. Their words therefore carry significantly greater persuasive force than those of an ordinary individual. The Supreme Court in Amish Devgan v. Union of India (2021) 1 SCC 1 recognised that speech by influential persons capable of generating hostility against protected groups attracts heightened scrutiny because of its potential to incite discrimination, hatred, and violence.

**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, *Shabeen 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 the Bharatiya Nyaya Sanhita, 2023 (BNS)**

The speeches delivered by BJP MLA Gopichand Padalkar and Dr. Dhavalsinh Mohite-Patil during the "Hindu Jan Akrosh Morcha" organised by Sakal Hindu Samaj at Georai, Beed, Maharashtra, on June 19, 2026, disclose the commission of several cognisable offences under the Bharatiya Nyaya Sanhita, 2023.

#### **Section 196 – Promoting Enmity Between Different Groups on Grounds of Religion**

Section 196 criminalises promoting enmity or hatred between different religious groups and acts prejudicial to the maintenance of harmony.

- BJP MLA Gopichand Padalkar repeatedly portrayed Muslims as unlawful encroachers upon temple lands and government property and demanded that mosques allegedly situated on such land be demolished using bulldozers.
- He further propagated inflammatory conspiracy theories including "Land Jihad," "Love Jihad," "Juice Jihad," and "Corporate Jihad," portraying Muslims as part of a coordinated campaign against Hindus.
- He also alleged that demographic changes across several States were the result of organised Muslim expansion and Bangladeshi infiltration, encouraging suspicion and hostility towards an identifiable religious community.
- The speeches collectively portray Muslims as a threat to Hindu society and are clearly intended to promote enmity and hatred between religious communities.

#### **Section 197(1) – Imputations Prejudicial to National Integration**

Section 197(1) penalises making or publishing imputations that any class of persons cannot bear true faith and allegiance to the Constitution of India or are unworthy of equal constitutional protection.

- Dr. Dhavalsinh Mohite-Patil stated that "if these people do not respect our Constitution, it becomes very difficult to get justice through the Constitution." This sweeping allegation was directed against the Muslim community, attributing collective disrespect for the Constitution to an entire religious group.
- By portraying Muslims as inherently unwilling to respect the Constitution and suggesting that constitutional processes are ineffective when dealing with them, the speech seeks to delegitimise an entire community's place within the constitutional framework and undermines national integration.

### **Section 299 – Deliberate and Malicious Acts Intended to Outrage Religious Feelings**

Section 299 penalises deliberate and malicious acts intended to outrage the religious feelings of any class of citizens.

- The speeches singled out mosques for demolition and repeatedly portrayed Muslim religious institutions as illegal encroachments deserving destruction.
- The call to demolish places of worship before any lawful adjudication, coupled with demands to erase village names associated with Muslim history solely because of their religious association, constitutes a deliberate attack upon the religious identity and sentiments of the Muslim community.
- These statements are calculated to outrage religious feelings and deepen communal antagonism.

### **Section 302 – Uttering Words with Deliberate Intent to Wound Religious Feelings**

Section 302 criminalises uttering words or making statements with deliberate intent to wound the religious feelings of any person or class of persons.

- Dr. Dhavalsinh Mohite-Patil repeatedly used the derogatory slur "Landi" while referring to Muslims during his speech.
- The repeated use of abusive and demeaning expressions directed at an identifiable religious community was intended to humiliate, insult, and degrade Muslims on account of their religious identity.
- Such language falls squarely within the prohibition contained in Section 302.

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

Section 352 penalises intentional insults or provocation likely to cause a breach of public peace.

- Dr. Mohite-Patil stated:  
*"We will gouge their eyes out first, and only then will we look at the Constitution."*
- This statement is an explicit exhortation to resort to violence instead of constitutional processes and is capable of provoking immediate public disorder.

- Similarly, repeated public demands for bulldozing mosques and portraying Muslims as enemies of Hindu society were intended to inflame communal passions and disturb public tranquillity.

### **Section 353 – Statements Conducive to Public Mischief**

Section 353 criminalises making, publishing, or circulating statements intended to create fear or alarm among the public or incite one community against another.

- BJP MLA Gopichand Padalkar repeatedly disseminated unverified and inflammatory allegations regarding "Land Jihad," "Love Jihad," "Juice Jihad," "Corporate Jihad," demographic conspiracies, and Bangladeshi infiltration linked to political parties governing various States.
- These statements were presented as factual assertions despite lacking any evidentiary basis and were calculated to generate fear, suspicion, and hostility against Muslims.
- By portraying an entire religious community as an organised threat to land, religion, women, and national security, the speeches are likely to incite communal tension and public disorder, thereby attracting liability under Section 353.

Accordingly, the speeches disclose prima facie offences under Sections 196, 197(1), 299, 302, 352, and 353 of the Bharatiya Nyaya Sanhita, 2023, warranting the immediate registration of an FIR and a prompt, impartial investigation in accordance with the binding directions of the Hon'ble Supreme Court on hate speech and communal incitement.

### **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.

**Prayer:**

In view of the foregoing, we respectfully urge you to take immediate cognizance of the hate speeches delivered by BJP MLA Gopichand Padalkar and Dr. Dhavalsinh Mohite-Patil during the "Hindu Jan Akrosh Morcha" organised by Sakal Hindu Samaj at Georai, Beed, Maharashtra, on June 19, 2026, as enclosed herewith, and to forthwith register a FIR against both speakers, as well as the organisers of the event, under the appropriate provisions of the Bharatiya Nyaya Sanhita, 2023, and any other applicable laws governing hate speech, incitement to violence, promotion of religious enmity, and offences against public tranquillity.

We further request you to inform us whether the event was videographed by the police authorities in compliance with the directions issued by the Hon'ble Supreme Court in *Shaheen Abdullah v. Union of India & Ors.*, and to preserve all audio-visual recordings, photographs, social media uploads, and other electronic evidence relating to the event. We also request that we be informed of the action taken on this complaint, including the registration of the FIR, the progress of the investigation, and any subsequent proceedings initiated against the accused persons.

We are submitting this complaint through email as well as Registered Post. We therefore request that the complaint be treated as information disclosing cognisable offences under Section 173 of the Bharatiya Nagarik Suraksha Sanhita, 2023, and that an FIR be registered forthwith in accordance with law.

In anticipation,

**Yours sincerely,**

**Nandan Maluste, *CJP President***

**Teesta Setalvad, *CJP Secretary***

**Annexures:**

Annexure A – Video of event dated June 19, 2026 downloaded by CJP