

**NEELA GOKHALE &
ILAM PARIDI**

ADVOCATES
SUPREME COURT OF INDIA

To
The Hon'ble Chief Justice
Delhi High Court
New Delhi- 110001.

Sub: Suo-Moto cognizance of the offence punishable under the Protection of Children from Sexual Offences Act, 2012, the Information and Technology Act, 2008 and the Indian Penal Code, 1860.

Respected Hon'ble Chief Justice,

1. This is in reference to the aforesaid subject. I am mindful that the Delhi Police and the administration is already occupied with regulation and enforcement of various measures being taken in the wake of the Covid-19 pandemic. However, the seriousness and gravity of the illegal activities of a large group of boys from Delhi, discussing ways and means to rape and sexual harass women, including minor and under-age girls *via* social media platforms, has compelled me to address the present letter to your Lordship, urging you to direct the appropriate authorities to register FIRs against the perpetrators and initiate investigation in the said matter, at the earliest.
2. It has been reliably learnt that a group of boys, allegedly from South Delhi, aged about 16-18 years of age, have created a group chat on Instagram, a social media platform, under the name and style of '*Bois locker room*'. The contents of the conversation and chats on the group, which have now emerged in public domain, are extremely shocking. The content is related to obscene and lewd comments on the private body parts of the women, with further threats and offers to leak morphed nude pictures and circulate them. Private photographs of women and girls were shared accompanied by foul and degrading comments in respect of the girls in the photos. Furthermore, the conversation between the members went to the extent of making plans to 'gang rape' the said minors.

A sample screenshot reveals that the boys have made statements, such as – “*We can rape her easily*” and “*I will come whenever you say. We will gang rape her*”, “*I will get more boys*” etc. [ANNEXURE 1]

3. These photographs have been taken without the consent of the depicted women/girls, and shared amongst the groups. The comments which follow the photographs are extremely objectionable and of highly pornographic nature. It shocks the conscience of any right-thinking member of society to see that school going boys are indulging in border line pedophilia and misogynistic behavior and are using social media platforms to perpetrate crimes against women and propagate rape culture.
4. The entire episode has come within public domain as someone from within the boys group itself, leaked screen shots of the conversation of the lewd chats and sent them to few girls who then posted the same on their profiles, with intention to call out the illegal and abominable activities of these boys. Since then, it is appalling to note that this incident is one of the top trending topic on twitter, accompanied by the hashtag #boyslockerroom. It is learnt from further content trending on the social media that members of the group have urged the co members to leave the said group, so as to avoid being traced and make another one, which reportedly has been taken down by the social media platform, however failing to act as a deterrent, as the perpetrators have gone ahead and reported to have made a new Instagram page ‘*Bois Locker Room 2.0*’ with the bio that ‘*Lets start this again, join this group with fake accounts so no one can expose u, message me the username of ur fake account*’. [ANNEXURE-2]
5. The chats on the new group, also in public domain, have threatened the girls who have reported the said activities that they will regret reporting the same to authorities and they will be taught a lesson by leaking their nude photos. After the said news came to be reported and shared on the social media by various users, starting from one Ms. Niska Nagpal, they started threatening the whistleblowers with death threats and rape threats and went on to pass comments like “*bada feminist banna hain na inko*”, *They’ll know, Kaheen muh dikhane layak nahi rahengi*” [Translation: They really want to be feminists, they’ll know. They will not be able to even show their face anywhere]. [ANNEXURE-3]. It is pertinent to state that as per Section 499, 503 and 507 of the

IPC, threatening a woman by any kind of anonymous, makes it punishable with an imprisonment of 2 years.

6. It is pertinent to state that as per the report published by the Quint on 04.05.2020, the South Delhi and Uttar Pradesh Police have told 'The Quint' that they are waiting for parents to come forward with a formal complaint. So, there's no case registered as of now. Also, according to The Mumbai Mirror, the transcripts of the chat – which ran over a 100 pages – revealed that the boys were body shaming the girls and used words like 'gang bang' and 'rape' Throughout the chat, girl students were reportedly referred to as 'trash'. The matter came to light when two mothers took it up with the school authorities, after their girl children refused to attend school. However, on account of inaction on part of the investigative authorities, no real punitive action came to be taken against the perpetrators of crimes.
7. The aforesaid activities of those involved in the group amount to commission of serious offences under various provisions of the Prevention of Children from sexual offences Act, 2012, including Section 13 dealing with Use of Child for pornographic purpose; Section 15 dealing with Punishment for storage of pornographic material involving child; as well as Sections 354 (A)(1)(iv), 499, 503, 507 and 509 of the IPC, and S. 66 (E) of the Information and Technology Act, 2008 [*Punishment for violation of privacy*]. It is necessary that urgent action be taken by the concerned police authorities and register FIR's against the perpetrators of the said offences.
8. It is submitted that while virtual platforms and technology have been a boon for enabling people to learn, share, and grow, few handful rogues cannot be permitted to dilute the credibility and utility of the social media platforms, to perpetuate and propagate their vile and abusive behavior. The mediums which were meant to lend voices even to the voiceless, cannot be permitted to offer its platform as a breeding ground for misogyny and extend all the offline sexism and objectification that prevails, online. Under the POCSO Act, the social media platforms are under obligation to report and provide information to the Special Juvenile Police Unit or the local police in regard to such content being posted and shared in its platform and the social media platform cannot stop at simply taking down the objectionable content. These unprecedented ways of violence against women online need to be nipped immediately as something as

simple as any chat have all the propensity to translate into sexual violence of great magnitude in no time at all. Experience has shown that actions such as victim blaming, locker room banter, rape jokes, etc. provides an impetus to rape, molestation and in some cases murder. If this incident is not taken serious note of then such normalization is likely to transform into degradation and explicit violence.

9. The aforesaid unfortunate incident is diabolical in nature and invites abhorrence of the collective, it shocks the judicial conscience and impels it to react keeping in view the collective conscience, cry of the community for justice and the intense indignation the manner in which the crime is committed. Hence, justice demands that there needs to be punishment meted out which befits the crime, so that it reflects public abhorrence of the crime and that too at the earliest point of time, in order to ensure that not only should the justice be done but it must also be seen to done.
10. Therefore, in the light of the aforesaid, we beseech your Lordships, to take *suo-moto* cognizance of the aforesaid incident and direct the concerned police authorities to register FIR against the perpetrators and initiate investigation in the matter. We have taken the liberty to write the present letter to you Sir, seeking suo moto cognizance, since as members of the society and especially as members of the legal fraternity, we are under an obligation not to remain silent spectators in matters of violent crime against women and leave it to the victims alone to fight a lonely battle, in face of such open threats issued to them on the same social media platform, which have further increased their vulnerability and left them exposed to further abuse.

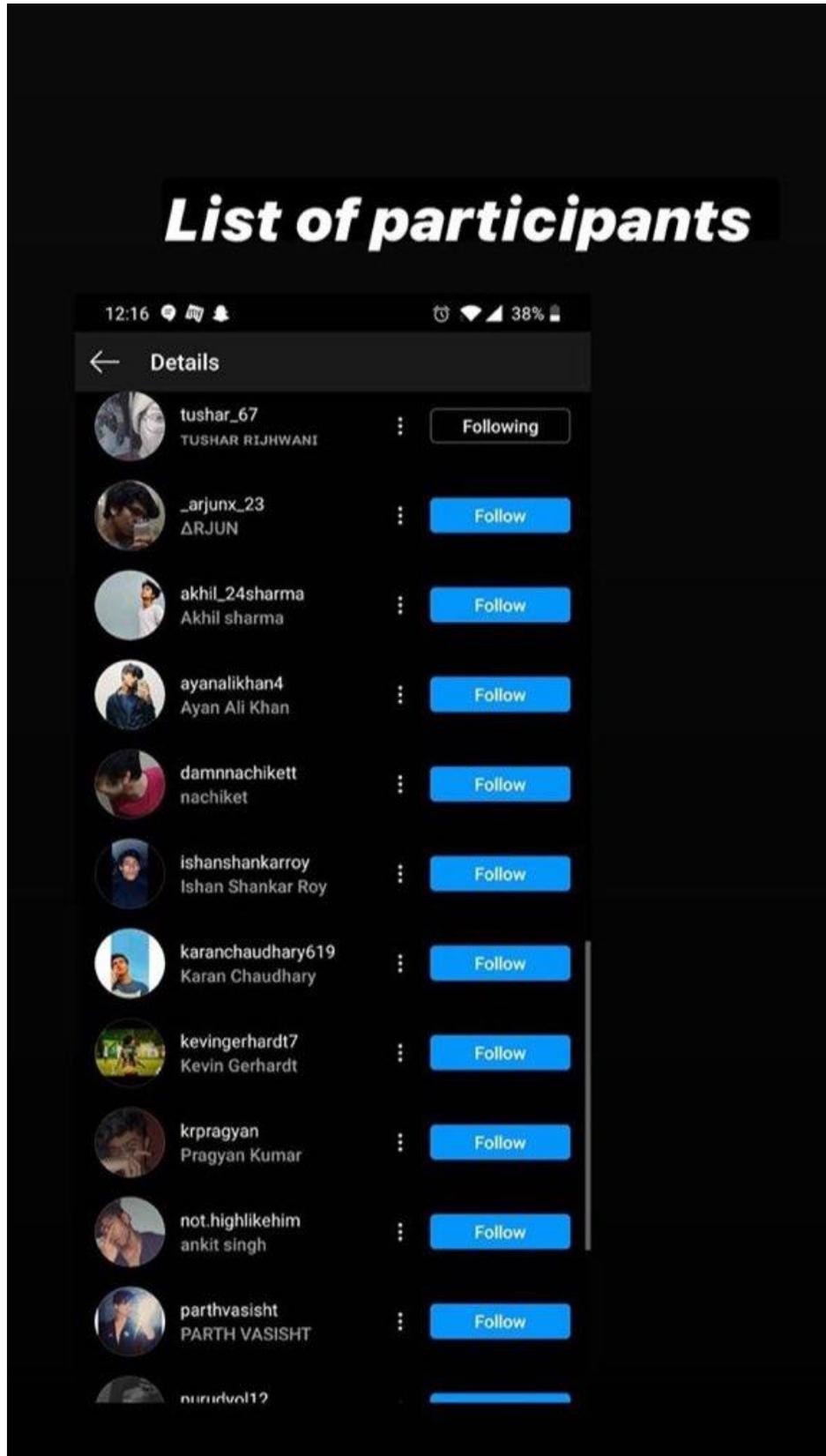
NEELA GOKHALE
Advocate

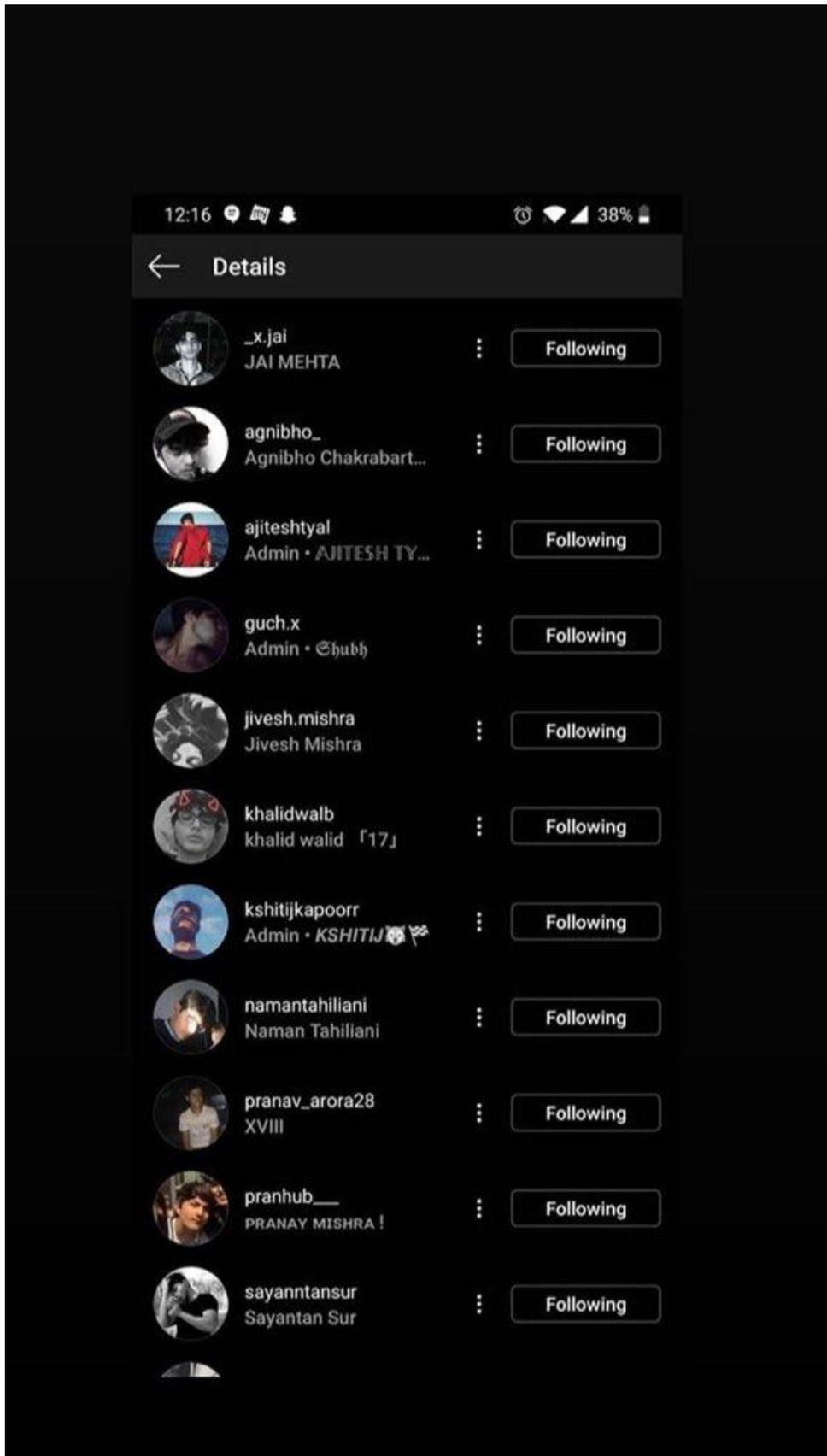
ILAM PARIDI
Advocate

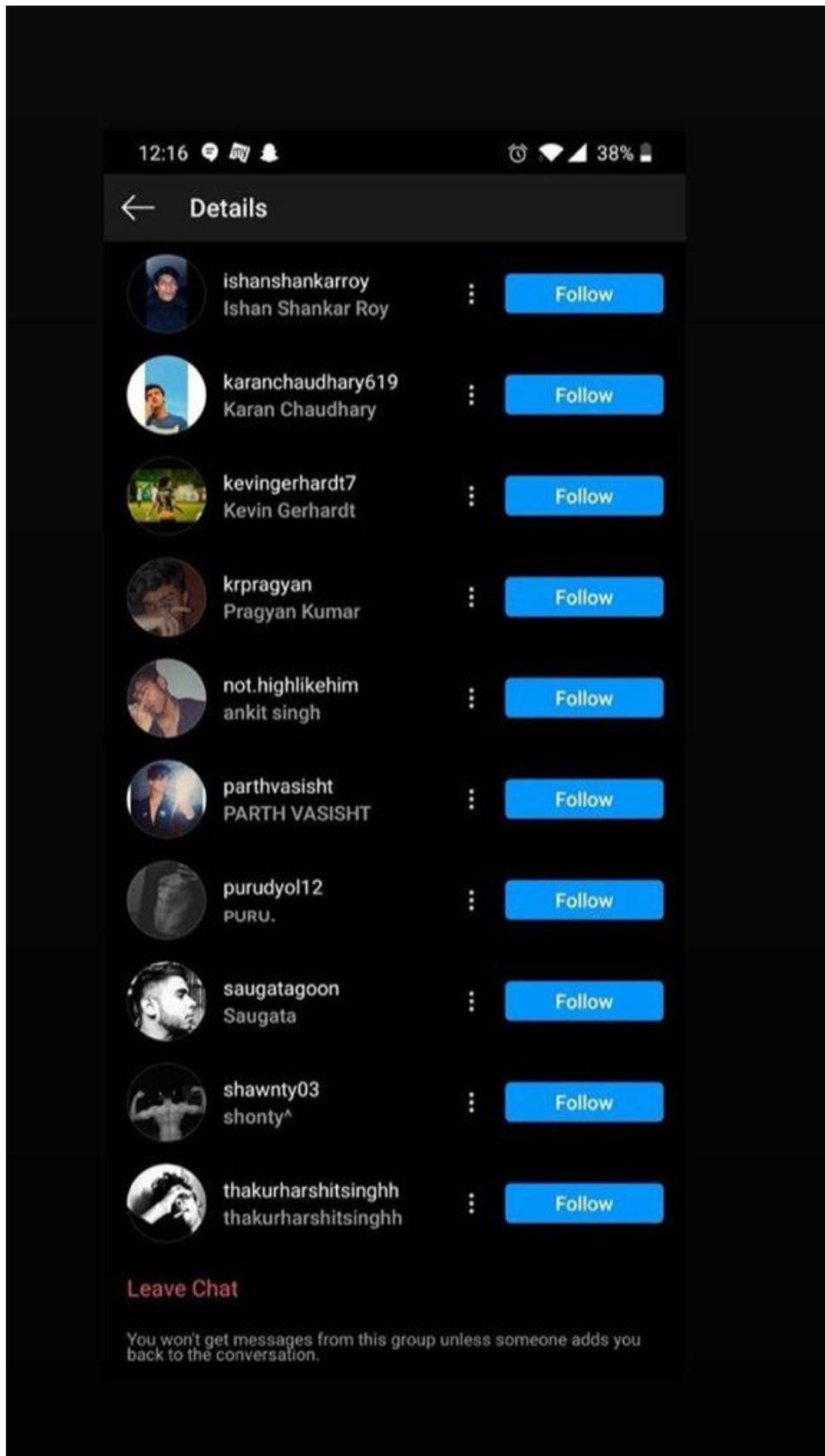
Encls.: Annexures 1-3.

ANNEXURE 1

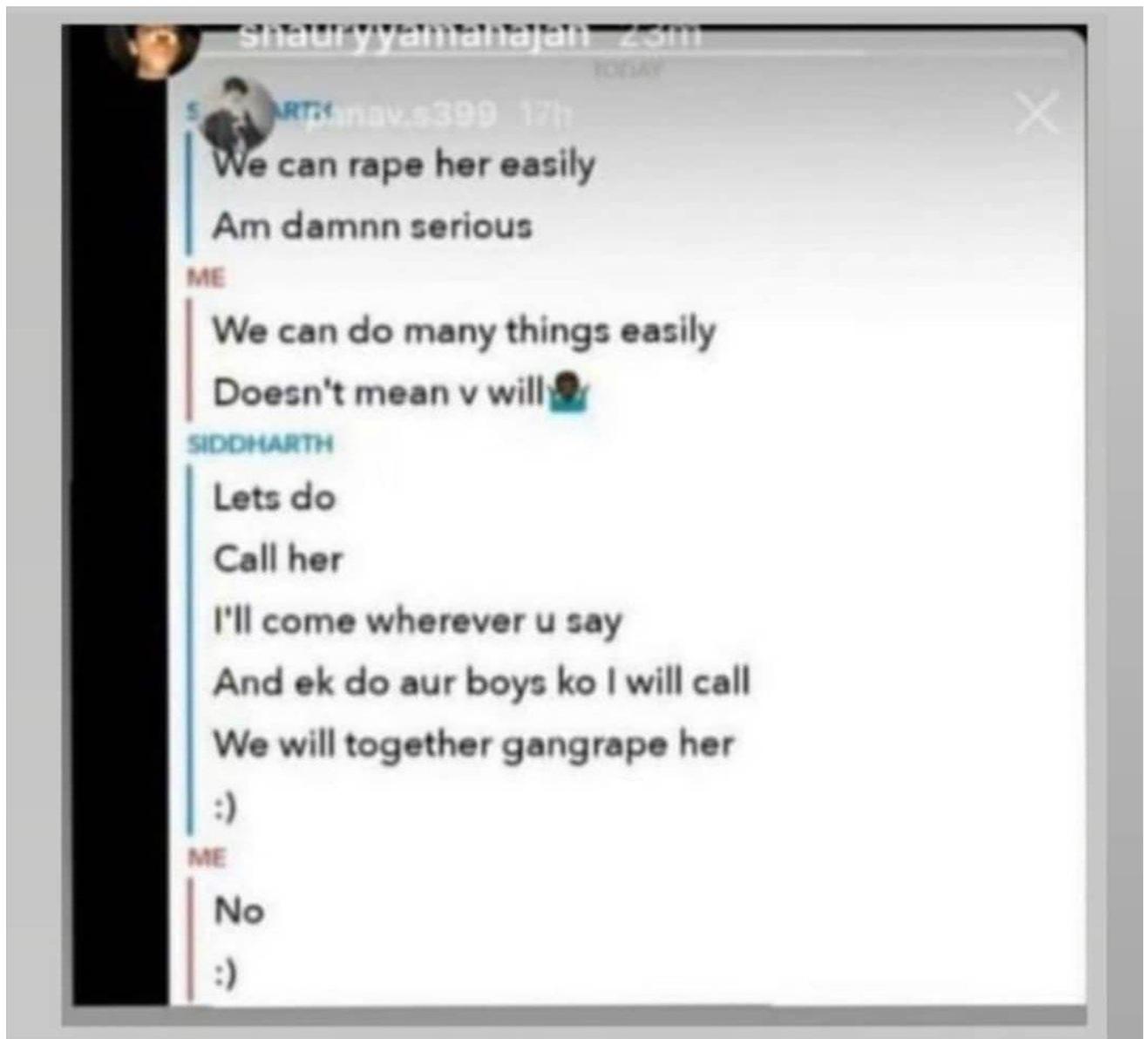
MEMBERS OF THE 'BOIS LOCKER ROOM'

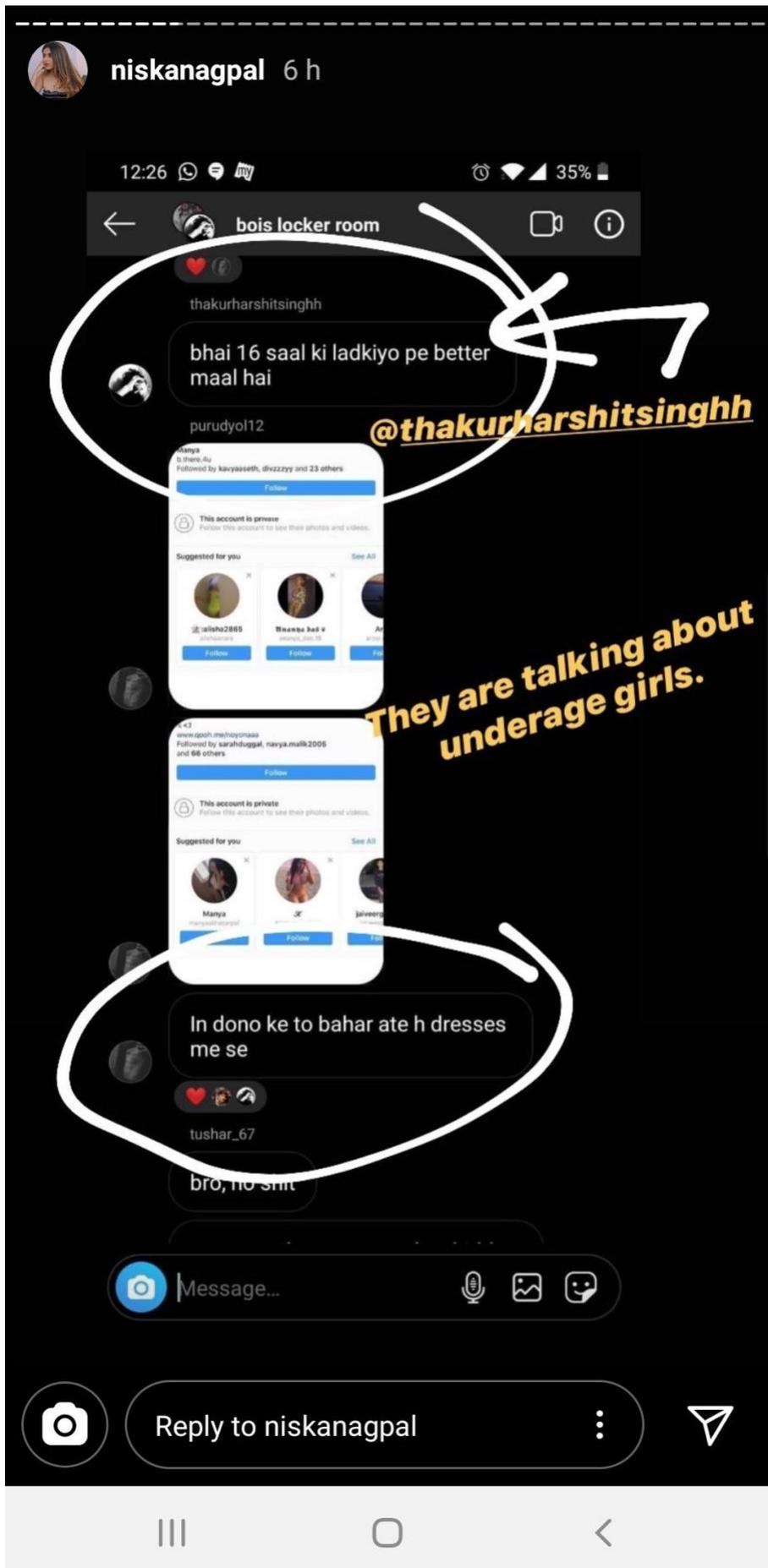


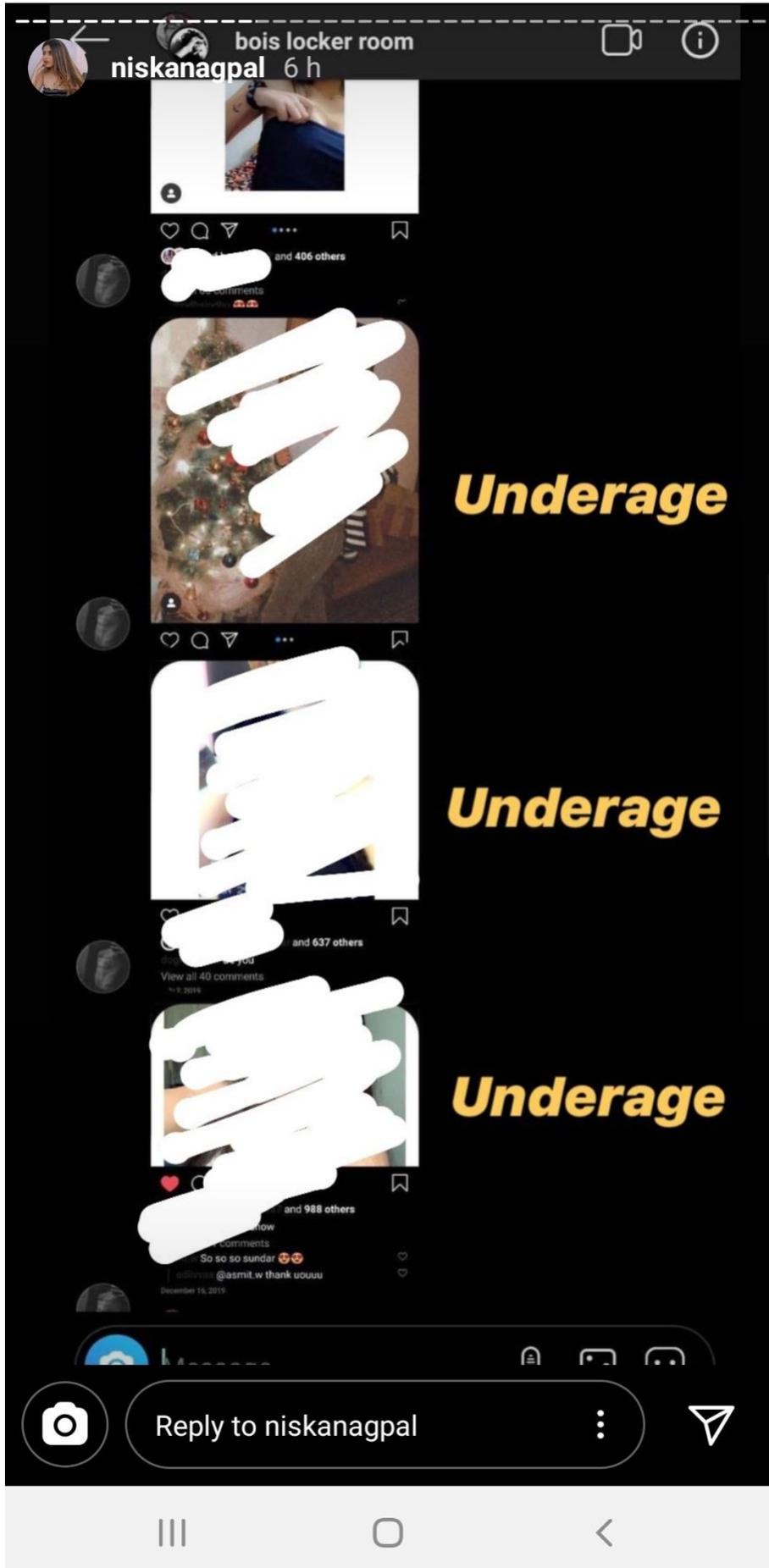


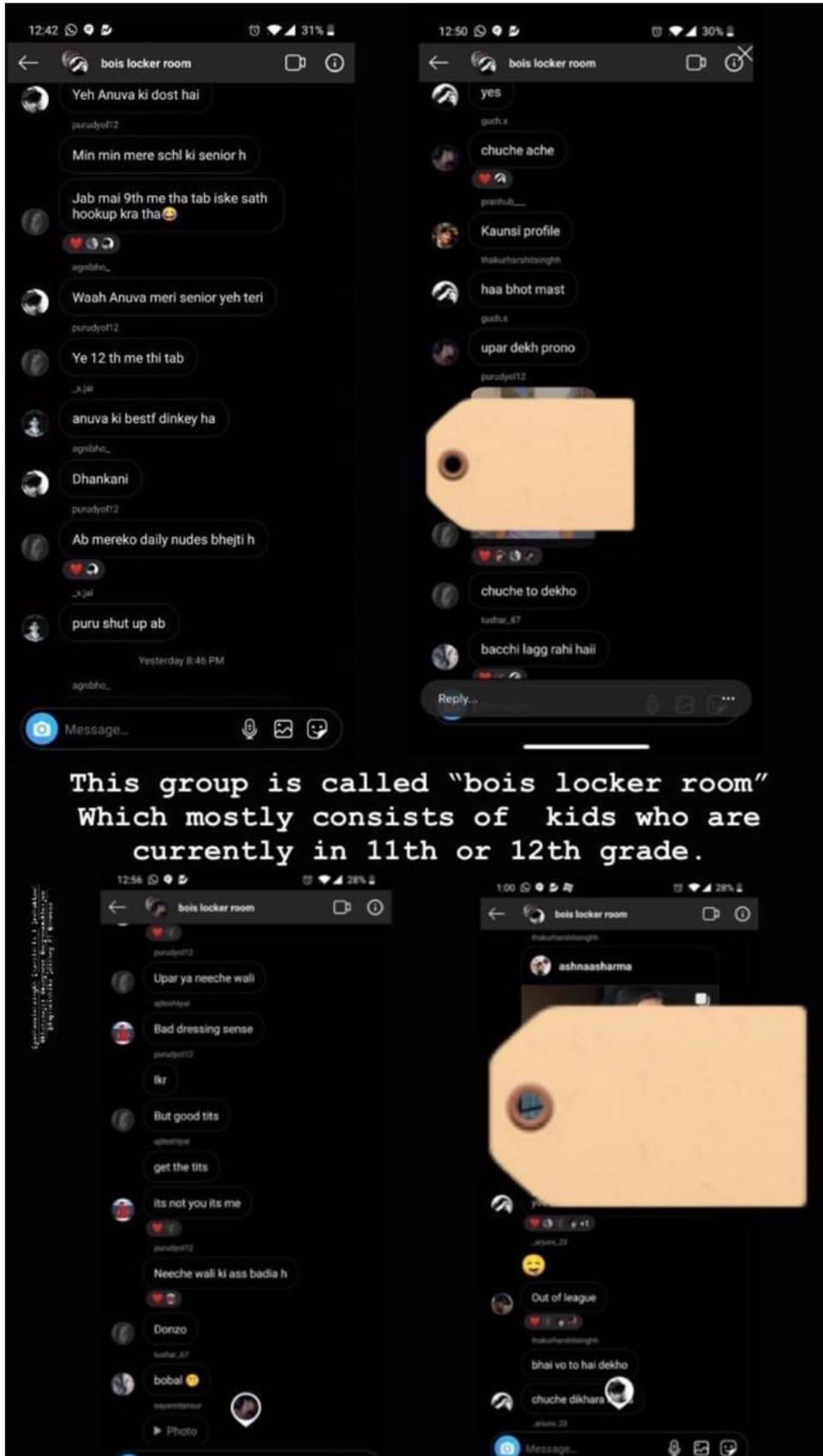


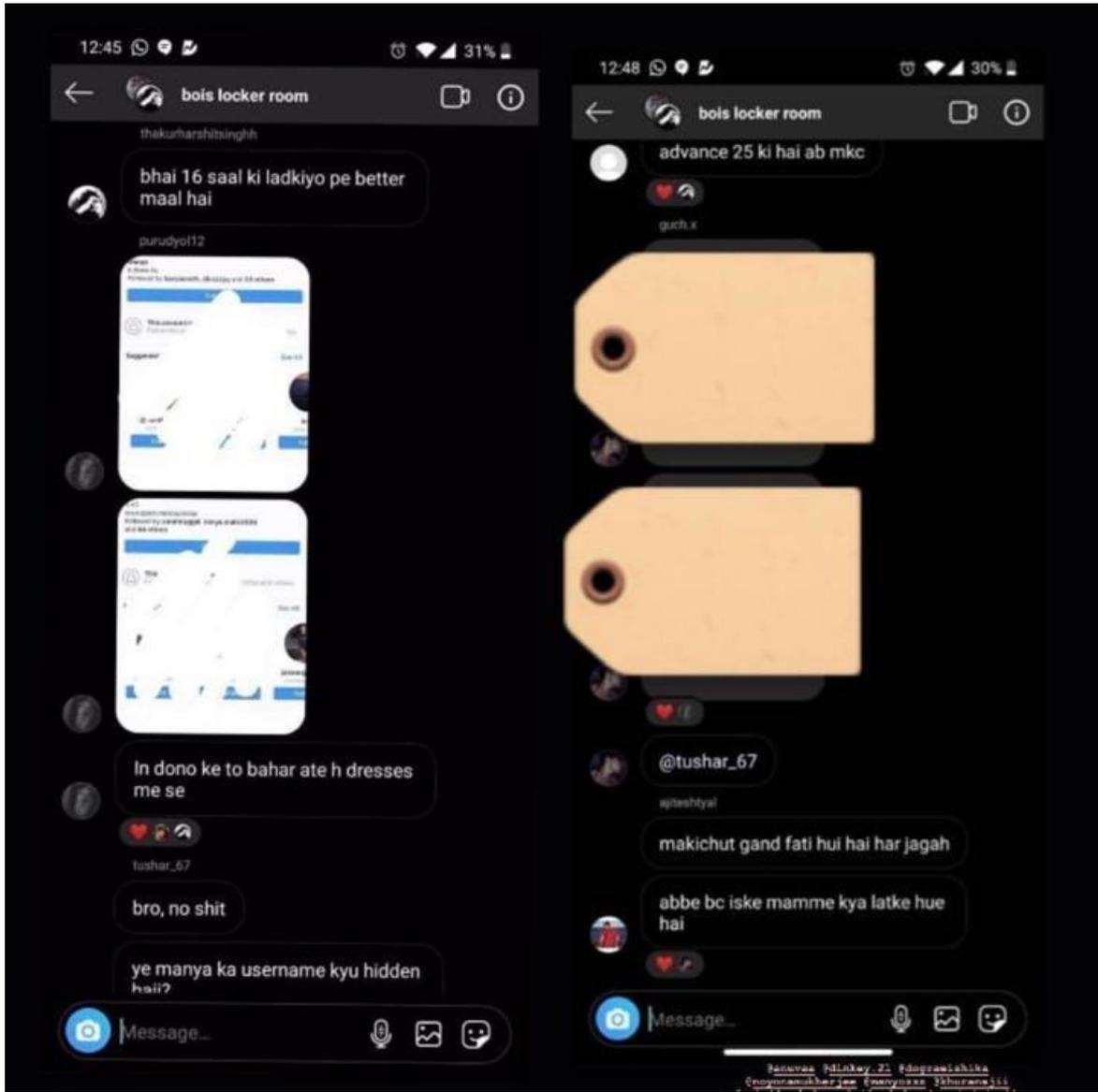
CHAT ON SNAPCHAT BY THE SAME MEMBER



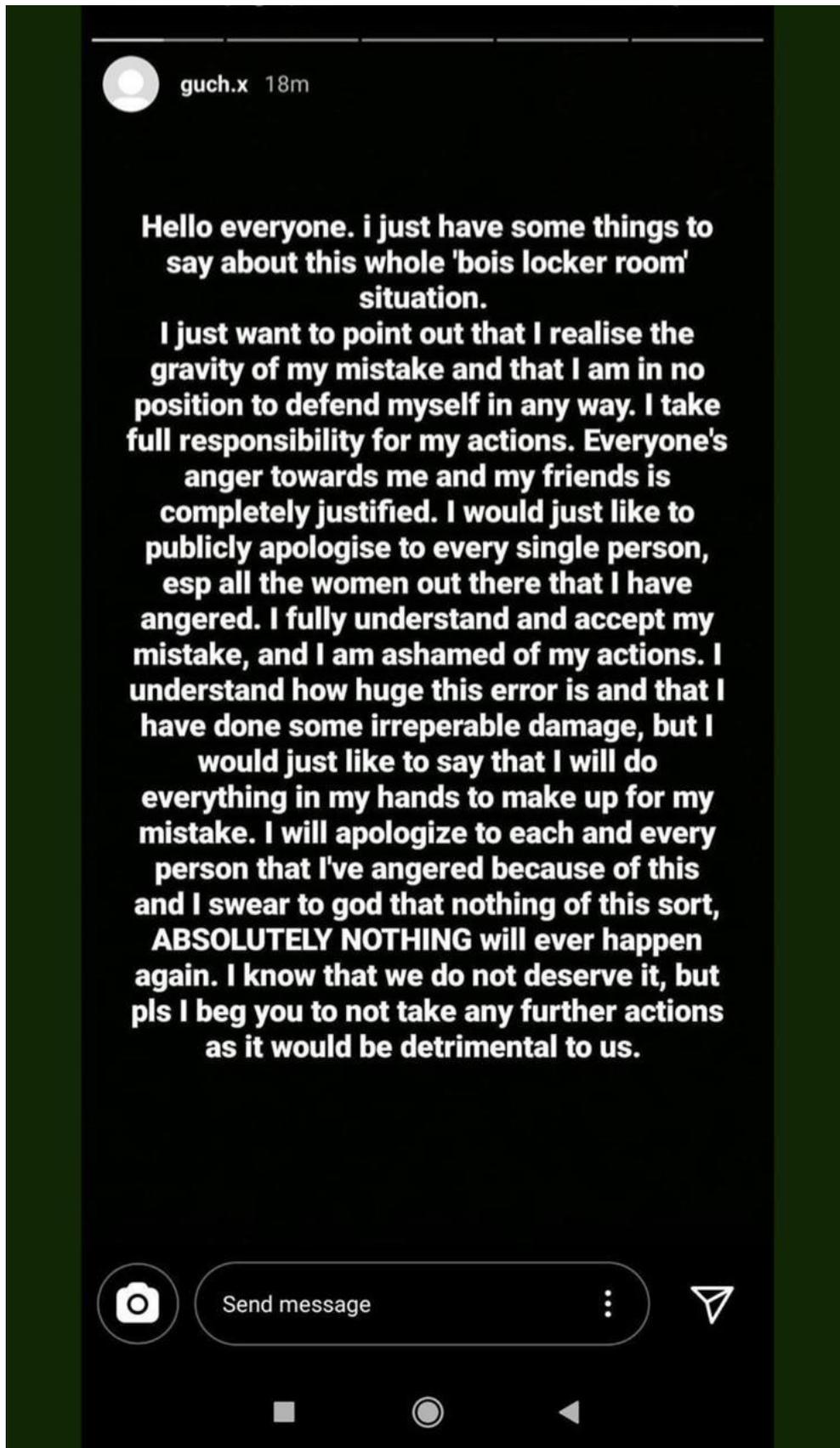








CONFESSIONS



ANNEXURE 2



ANNEXURE 3



