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06.05.2020

To

Registrar,
Section X,
Supreme Court of India,
New Delhi-110201.

Sub: WRIT PETITION (C) DIARY No. 10817/2020 FOUNDATION FOR
MEDIA PROFESSIONALS VS. U T OF J&K

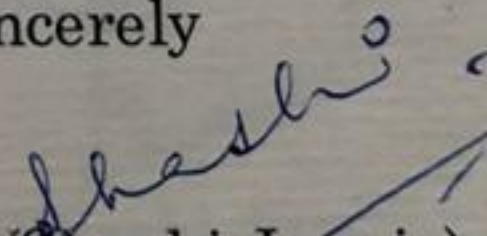
Sir,

Please find enclosed a Note in the captioned petition, necessitated due to the peculiar circumstances, with a request to place the same before the Hon'ble Justices of Hon'ble Supreme Court of India.

Thanking you

Encl: as above

Sincerely


(Shashi Juneja)

**IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) DIARY No. 10817/2020**

**IN THE MATTER OF:
FOUNDATION FOR MEDIA
PROFESSIONALS PETITIONER**

VERSUS

**UNION TERRITORY OF JAMMU
AND KASHMIR AND ANR. RESPONDENTS**

**NOTE PLACING ADDITIONAL FACTS ON
RECORD ON BEHALF OF RESPONDENT NO. 1
(UNION TERRITORY OF JAMMU AND
KASHMIR)**

Advocate for the Respondent :

**IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) DIARY No. 10817/2020**

**IN THE MATTER OF:
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Filed by

NEW DELHI
DATED: 06.05.2020

COUNSEL FOR UT OF J&K

**IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) DIARY No. 10817/2020**

IN THE MATTER OF:

FOUNDATION FOR MEDIA

PROFESSIONALS

.... PETITIONER

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**UNION TERRITORY OF JAMMU
AND KASHMIR AND ANR.**

.... RESPONDENTS

NOTE PLACING ADDITIONAL FACTS ON RECORD

MOST RESPECTFULLY SHOWETH:

1. That the answering Respondent has filed a common Reply to the present Writ Petition and to Private Schools Association, J&K vs. U T of J&K, Diary No. 10904/2020 and Soayib Qureshi vs. UT of J&K, Diary no. 10875/2020, and the Applications filed therein which form part of the record of the case.

2. It is submitted that this Hon'ble Court was pleased to hear arguments on 04.05.2020, from both sides in the aforesaid petitions through video conference and was further pleased to reserve order vide order dated 04.05.2020.

3. It is submitted that since the prayer in all these Petitions is for restoring the mobile internet speed to 4 G, the answering

Respondent craves leave of this Hon'ble Court, to place on record certain facts, by way of the present Note, which further highlights how the medium of internet has been and still is being used in a minacious manner from across the border for inter alia, infiltration from across LOC, indoctrination/incitement of gullible youth and for destabilizing the country, putting the sovereignty and security of the State at stake.

4. It is submitted that instances of terrorism in the last few days have shown an upswing as is submitted in the main affidavit. Since 26th April, 2020 11 instances have taken place in which 10 terrorists have been killed while 8 number of brave officers and jawan belonging to the security forces of our country have been martyred. This includes CRPF personnel who have died due to attacks on the Nakas set up for control of Covid-19 while in a fierce encounter with the terrorists in Handwara, 05 officers died including a Commanding Officer (Colonel) and a Major of the Army and a Sub Inspector of the Police. Details of terrorists' incidents from 26.04.2020 to 05.05.2020 are annexed herewith and marked as **Annexure R1/1**. (pg. 4)

5. It is submitted that the newly launched terrorist organization named The Resistance Front (TRF) has been flooding the social media with videos to extend terror threats, to incite the

youth/general public and to underline the support from across the border. The social media propaganda is annexed herewith and marked as **Annexure R1/2**. (pg. 5)

6. It is submitted that an article published in 'The Print', dated 27.4.2020 which is based upon the Pakistan Army's 'Green Book' that has essays written by Pakistan Army's serving officers and others, it has been highlighted that this 'Green Book' calls for information warfare on Kashmir, taking the war into non-kinetic domains information/cyber warfare and Electronic Warfare (EW). It also mentions that the response of non-state actors, an euphemism for terror groups created, financed and supported by Pakistan Army and its intelligence wing-ISI, could be 'unpredictable and unrestricted'. Copy of the said Article published in 'The Print' is annexed herewith and marked as **Annexure R1/3**. (pg.6)

7. It is submitted that the present Note is filed to substantiate the material which is already on record.

Kashmir: Terrorist incidents during the period of 26th April to 5th May

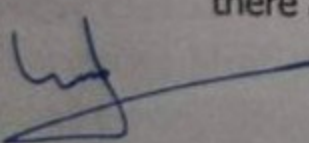
During the holy month of Ramazan, which started on April 25th, the terrorist activities have shown a spike. During the past 10 days, 11 terrorist initiated incidents were reported including 1 incident of firing attack on forces and 5 grenade attacks. Besides 5 encounters leading to elimination of 10 terrorists, 8 personnel of security forces were also martyred. 9 stone-pelting incidents were reported after fire-fight engagements and one event of civilians aggregating at the site after the encounter was also reported. Moreover there were 10 occasions of ceasefire violations in which 2 army personnel lost their life besides damage to property of civilians. Given below is the diary of events from April 26th to May 5th, 2020:

Date	Incident	Consequence
26-04-2020	Encounter at Gudder Kulgam	01 OGW killed
27-04-2020	Encounter at Lower Munda Qazigund Kulgam	03 terrorists killed 02 SF personnel injured
28-04-2020	Encounter at Melhoora Zainpora Shopian	03 terrorists killed 02 SF personnel injured 01 civilian injured
29-04-2020	Grenade attack on police deployment at Nowhatta Srinagar	04 CISF personnel injured 01 Police personnel injured
02-05-2020	Encounter at Dangarpora Pulwama	02 terrorist killed
02-05-2020	Encounter at Najar Mohalla Chanjimulla Handwara	02 terrorists killed 04 Army personnel martyred including two senior officers 01 Police SI killed 01 SF personnel injured
02-05-2020	Grenade attack upon CRPF at Tahab Pulwama	No damage caused
03-05-2020	Grenade attack upon SFs at Nowshera Srinagar.	The grenade did not explode
04-05-2020	Firing attack on CRPF at Wangam Kralgund Handwara Crossing	03 CRPF personnel killed 01 Civilian killed 01 CRPF personnel injured
04-05-2020	Grenade attack upon CISF Bunker at Grid Station Wagoora Nowgam Srinagar.	01 CISF personnel injured
05-05-2020	Grenade attack on police deployment at Pakharpora Budgam	01 CRPF personnel injured 01 Police personnel injured 04 civilians injured

Assessment for coming days: A series of inputs have come from multiple quarters suggesting possibility of infiltration across LoC. The terrorist outfit TRF has floated online warnings to carry on a spurt of attacks on security forces as well as select non-combatant targets. Terrorists of HM have also floated a hit list of soft targets who they are planning to eliminate in coming days. The month of Ramazan has especially been favourite with terrorists to further their nefarious designs; the anniversary of battle of Badr falling on May 11. There are reports of likelihood of grenade attacks intermittently to keep the pot boiling. Terrorists are also likely to continue attacking security forces deployed at check-points for Covid-19 containment and control related duties. It has also come to observation that anti-national elements have mobilized their cells to create wide-spread order disruption in the valley in coming days.

Social Media propaganda

1. During the holy month of Ramazan which started on April 25th, social media has seen a surge in activities of the terrorist organizations. Terrorist propaganda videos from HM, TRF, TMI are floating on Instant Messaging Applications. It seems the terrorist organizations are resorting to active psy-ops strategies by circulating new terrorist recruit pictures, propaganda items with radical content and a call to join Jihad (Al hind magazine of ISHP).
2. The terrorist organizations like TRP are using social media to float claims of attacks, owning of terrorist killed in encounters, messages about encounters, last call death throes audio to instill and glamorize the need for shahadat' for probable recruits.
3. Social media also witnessed emergence of new terror groups on Instant messaging applications. A new terror group namely '**Tehreek-i-Milat-i-Islami (TMI)**' has surfaced online. This group has propped-up in a manner similar to '**The Resistance Front (TRF)**' – it initially surfaced over social media and Instant Messaging (IM) applications – to widen its influence online, find potential targets and later get them recruited into their folds.
4. The recent month showed a bulge in radical content and terror activities and there are apprehensions of increase in terror recruitment.

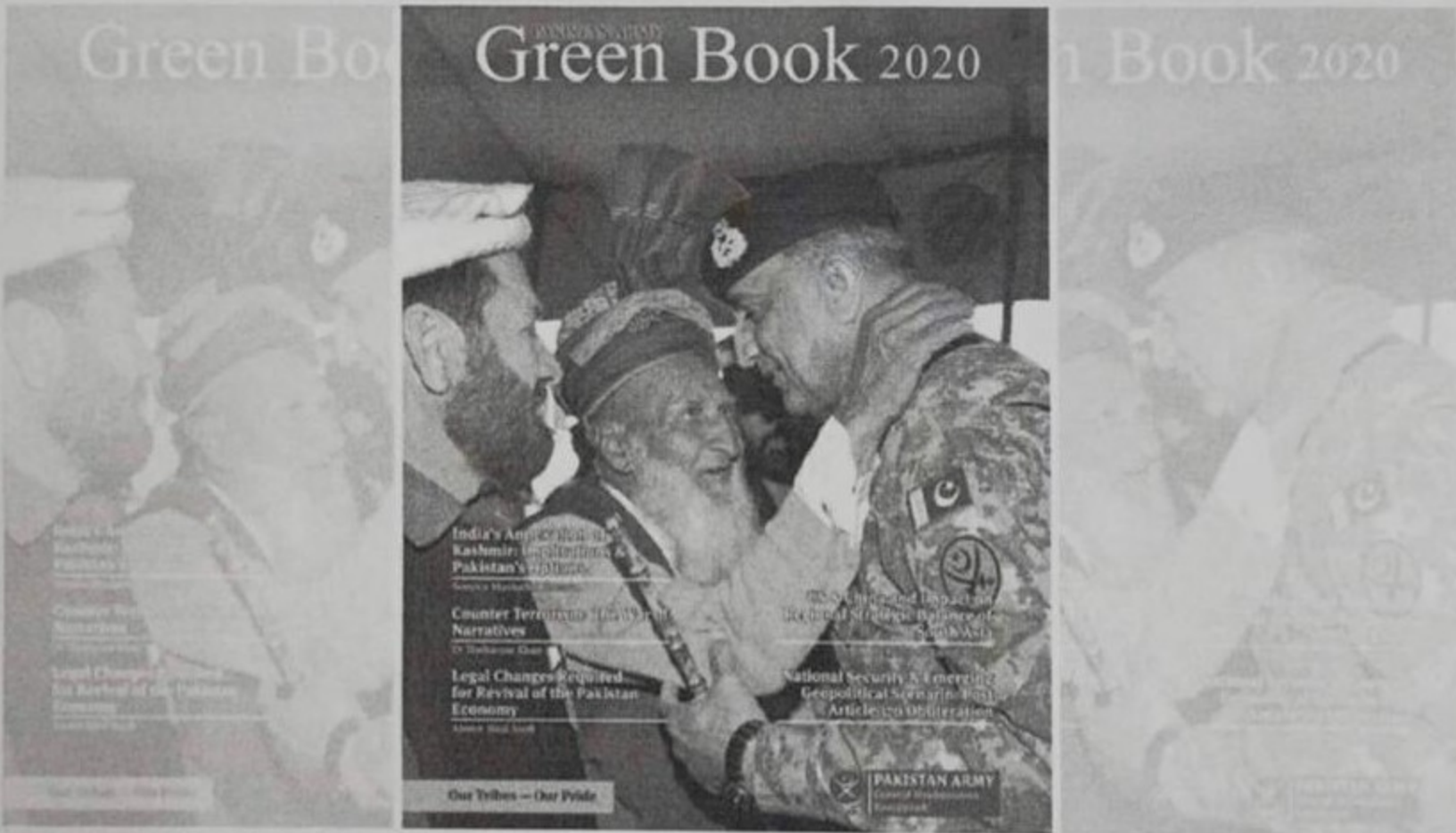


Balakot, Article 370 move changed geopolitics of region: Pakistan Army chief in 'Green Book'

Pakistan Army's 'Green Book' calls for information warfare on Kashmir, threatens to derail Afghan peace process to prop up J&K and slams blackout in Valley.

SNEHESH ALEX PHILIP

27 April, 2020 10:33 am IST



The Pakistan Army's Green Book | By special arrangement

Text Size: **A-** **A+**

New Delhi: The Balakot airstrike and the scrapping of Articles 370 and 35A by the Narendra Modi government are two significant events that will have a lasting imprint on the geopolitics of this region, Pakistan Army chief Gen Qamar Javed Bajwa has said in the "Green Book" of his force.

The Green Book 2020, the latest edition published by the Pakistan Army featuring essays by serving officers and others, focuses on the implications of these events from diverse perspectives and dimensions.