



IN THE HON'BLE METROPOLITAN MAGISTRATE'S 65th COURT
AT ANDHERI, MUMBAI
CRIMINAL COMPLAINT NO. _____ OF 2020

Mr. Ali Kaashif Khan D. ...

...Complainant

V/S

Ms. Kangana Ranaut

...Accused

COMPLAINT FOR THE OFFENCE
PUNISHABLE UNDER SECTIONS 121,
121A, 124A, 153A, 153B, 295A, 298 AND 505
OF THE INDIAN PENAL CODE.

MOST RESPECTFULLY SHEWETH:

It is hereby submitted on behalf of the Complainant (myself) above named, as under:

1

2. I say that I have always been raising my voice with legal actions in my personal capacity as much as well possible against anything wrong, illicit which is being committed in our country in order to maintain the brotherhood, unity, integrity and

peace prevail amongst everyone and the values of Constitution of India be practiced throughout the country.

3. I say that due to my sheer hardwork and service in the social working and legal fraternity, I have got impeccable respect and reputation in the society and people of all sects, be it Hindu, Muslim, Sikh, Christian, others give me immense esteem and honor.
4. I say that the accused being infamous Bollywood actress Ms. Kangana Ranaut is highly influential, powerful person with millions of followers, admirers as well as haters worldwide, need not mention her subsisting top notch Political contacts.
5. I say that I have already filed a private complaint in the Andheri Magistrate 66th Court against Ms. Kangana Ranaut and her sister Mrs. Rangoli Chandel dated 27/07/2020 for indulging in unlawful, illegal and criminal acts willingly by maliciously Spreading / Promoting Enmity between different groups on the grounds of religion and doing acts prejudicial to maintenance of harmony in the country by way of mischievously and spitefully posting frivolous, derogatory and defamatory posts with intent to outrage religious feelings of a class by insulting its religion or religious feelings / sentiments more specifically against Islam, Muslims, the said case is now pending further adjudication.
6. I say that since the time of Actor Sushant Singh Rajputs alleged suicide / death, there has been tremendous chaos in the Bollywood industry from several accusations to the topic of nepotism and all being vehemently majorly done by the controversial actress Kangana Ranaut to satisfy her ego and propaganda against several actors, which she has been time and again doing since the allegations made out by her against Actor Hrithik Roshan, Aditya Pancholi, etc. but the same is being shamelessly continued by her now taking undue advantage of the sad demise of Actor Sushant Singh Rajput.
7. I say that the accused has stooped cheap low and have started attacking the State Government of Maharashtra and its political party Shivsena by allegedly indirectly levelling them as accused behind the death of the Actor Sushant, thereby calling and concluding it a murder. Hereto annexed and marked as EXHIBIT A is the copy of the tweet made by the accused on her twitter account towards derogatory remarks against Mumbai Police on Actor Sushant Singh Rajput's death which is also reproduced below as:

(i) "Liking derogatory tweets about people who are fighting against the murderers of Sushant, instead of condemning public teasing and bullying like this @CPMumbaiPolice is encouraging it, @MumbaiPolice has hit all time low ... SHAME !!"

(dated: 01/09/2020)

8. I say that the accused has now crossed all her limits by even questioning the credibility, calibre, hardwork, dedication of the Maharashtra and Mumbai Police by yet again wrongfully putting allegations on them levelling them as well behind the sad demise of the late actor stating that they are allegedly supporting the self claimed murder / death of the said late actor.
9. I say that the accused has now stepped above the law and have called the economic capital of India and its pride i.e. the MUMBAI city as 'PAKISTAN OCCUPIED KASHMIR' using her verified twitter handler @KanganaTeam on 03/08/2020; The accused using her power, fans, followers have been continuously tarnishing the image and reputation of the country and its part, thereby have now started calling and levelling it with our enemy country for her personal benefits and gains. The accused has been shamelessly promoting enmity amongst our country people for her political gain and for the same she has not even spared the country and its part being the MUMBAI City from where she has grown and became a superstar , thus it won't be wrong to call her as a traitor who have been 'eating and spitting in the same plate.' She has even further called the Home minister of the Maharashtra state Mr. Anil Deshmukh as 'TALIBAN.' Hereto annexed and marked as ANNEXURE B COLLY are the tweets / statements made by the accused against the Mumbai city and sitting government of Maharashtra which are also reproduced below as:

(ii) Sanjay Raut Shiv Sena leader has given me an open threat and asked me not to come back to Mumbai, after Aazadi graffitis in Mumbai streets and now open threats, why Mumbai is feeling like Pakistan occupied Kashmir?

(dated: 03/09/2020)

(iii) He is taking his own calls on my democratic rights, from POK to Taliban in one day 😊

(dated: 04/09/2020)

(iv) Kangana has no right to stay in Mumbai, we will make sure she can't enter Mumbai, we will beat her to death with stones and rods just how we lynched Palghar Sadhus. How you promoted yourself from POK to Taliban just in one day is commendable 😊

(dated: 04/09/2020)

(v) Talibani 😊

(dated: 04/09/2020)

10. It is pertinent to note that the said malicious tweets have defamed our country, its police, authorized government bodies, executive machineries all being established by the laws in India and have created serious ruckus in the country which has not just hurt my feelings but also have hurt the emotions and feelings of the MUMBAI POLICE, its retired officers, Mumbaikars, Maharashtrians and all the fellow Countrymen. The accused has been continuously creating fear and panic in the minds of the country people, more specifically Mumbaikars by indirectly and directly terming it as terrorist spot / hub.

11. It is imperative to also note that the accused has no respect for the law of the land; she has been time and again vehemently with malafide intentions and ulterior motives creating the hatred atmosphere in the country amongst the Hindus and the Muslims, thereby causing serious threat to the integrity of the country. Hereto annexed and marked as ANNEXURE C COLLY are the tweets / statements made by the accused causing disharmony amongst Hindus-Muslims in the country which are also reproduced below as:

(vi) शर्म नहीं आती, अकबर और दवूद पे कितनी फ़िल्में बनाई है? कितनी बड़ी बड़ी फ़िल्में बनाई गयी हैं, ये मिला मराठाओं को अपने खून के बलिदान के बदले? इनमें से एक भी फ़िल्म शायद मेन्स्ट्रीम हिंदी नहीं है या फिर रिलीज़ नहीं हुई किसी ने तो कभी सुना भी नहीं इनके बारे में।

(dated: 04/09/2020)

(vii) इनकी औकात नहीं है, इंडस्ट्री के सौ सालों में एक भी फ़िल्म मराठा प्राइड पे बनाई हो, मैंने इस्लाम डॉमिनेट इंडस्ट्री में अपनी जान और करियर को दाओ पे लगाया, शिवाजी महाराज और रानी लक्ष्मीबाई पे फ़िल्म बनाई, आज महाराष्ट्र के इन ठेकेदारों से पूछो किया क्या है महाराष्ट्र के लिए?

(dated: 04/09/2020)

12. It is further also categorically stated that recently a private complaint under section 156(3) of CRPC was been filed against the accused before the Magistrate Court at Bandra, Mumbai for creating and atmosphere of hate in the country by defaming the Bollywood industry. After which the learned magistrate court ordered necessary action and Investigation vide order dated 16/10/2020. Hereto annexed and marked as ANNEXURE D is the order of the said magistrate court at Bandra, Mumbai against the accused.

13. It is already known from the above evident prima facie facts that the accused has no respect for the varied communities of India, law of the land, authorized government bodies further even shamelessly she has prominently even made fun of the JUDICIARY, as after the above said order of the learned magistrate court at Bandra, Mumbai she has promptly yet again tweeted on her twitter account with a malicious, defamatory tweet against the Judiciary by cheap act of calling and terming the judiciary as "PAPPU SENA" thereby even amounting to CRIMINAL CONTEMPT OF COURT. Hereto annexed and marked as EXHIBIT E is the copy of the defamatory tweet made against the judiciary for passing order.

(viii) *Who all are fasting on Navratris? Pictures clicked from today's celebrations as I am also fasting, meanwhile another FIR filed against me, Pappu sena in Maharashtra seems to be obsessing over me, don't miss me so much I will be there soon Red heart #Navratri*

(dated: 17/10/2020)

14. I say that the accused and her sister have always been into controversy due to her unnecessary repeated social media attacks on Actor Hrithik Roshan to garner cheap publicity for herself. Actress Kangana Ranaut is already known for speaking utter crap by provoking respectable people of the country for which even Actor Aditya Pancholi and her wife Zarina Wahab have filed defamation case against her in Andheri Magistrate Court.

15. I say that she has stooped even low by misusing her fanbase, fame, power, influence through her social media accounts and have been creating hatred, enmity amongst authorized legally constituted government bodies and also prevailing religions in India through her abovesaid tweets /statements with an aim and intent to garner cheap publicity, personal gains and benefit by taking undue advantage of the grave situations prevailing in India.

16. I say that after the several illicit tweet made by the accused no.1, I immediately filed a Police complaint before the Andheri Police Station on 04/09/2020 and requested the concerned police to forthwith register FIR against the accused; the concerned police station even took my statement within few days but till date no action has been taken against the accused despite the offences being serious in nature. Hereto annexed and marked as ANNEXURE F is the copy of the Police complaint filed against the accused.
17. It is pertinent to note that every Indian Citizen has got the right to Freedom of Speech and not Freedom of 'Hate Speech'; we have all got limitations to use the right to freedom of speech and expression, yet several people including the present accused have been spreading hate, breaking the brotherhood, integrity of the country through their time and again provoking hate speeches disrupting peace in the country.
18. Thus the said prima facie evident criminal acts have rendered the accused liable for prosecution under the provisions of the Indian Penal Code, 1860 and thus, in the light of the afore said premises and in great anticipation I have filed this present complaint before this Hon'ble Court for the offences under sections 121, 121A, 124A, 153A, 153B, 295A, 298 AND 505 of the Indian penal code, 1860.
19. I say that correspondence address comes under the jurisdiction of Andheri Police Station, which is within the jurisdiction of this Hon'ble Court and thus this court has power / Jurisdiction to entertain and try this present case.
20. I crave leave to add, amend, alter, delete, rectify or modify the present complaint with prior permission of this Hon'ble Court.
21. Hence I am filling the present Complaint before this Hon'ble Court on the grounds which are without prejudice to one another as follows:-

Hence the complainant prays as under:

- i. That this Honorable Court may graciously be pleased to take cognizance of the present case and ISSUE PROCESS against both the Accused for the offences under sections 121, 121A, 124A, 153A, 153B, 295A, 298 AND 505 of the Indian penal code in the interest of justice.

- ii. That both the above accused be tried for the offences mentioned above in the present case.
- iii. Any other Acts and sections be levied against all the accused, as the Hon'ble Court finds fit.
- iv. Interim or ad-interim relief, if any.
- v. Any further order in favor of Complainant in the interest of justice.

AND FOR THIS ACT OF KINDNESS THE COMPLAINANT SHALL BE OBLIGED TO THIS HONOURABLE COURT FOREVER.

THIS 22nd DAY OF October 2020

Complainant