



- Fellow, Hoover Institute, Stanford University, CA, USA, 2014
- Fellow, US Department Of State, Bureau of Educational and Cultural Affairs, 2009

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Chambers: Mi'mar Legal, 2nd Floor, Corporate House, C-154, Lane 2 (Honda Lane) Rajbagh, Srinagar. J&K. 190008.
& SLJ Office, PW Building, 1st Floor, District Court Complex, Srinagar. J&K. 190001.

THROUGH SPEED POST/E-MAIL

REF No.: LOSRJ/LegalNotice/MehboobaMufti/37-2019

Dated: 06/07/2019

To

Mr. Arnab Goswami,
Editor-in-Chief, Republic TV,
Presentor/Anchor of the programme "Arnab Goswami on the Debate at 10",
Bombay Dyeing Compound,
Worli, Mumbai. 400018.
Phone: 022-45121223
E-mail: contact@republicworld.com

RE: Legal Notice issued on behalf of my client Ms. Mehbooba Mufti D/O Late Mufti Mohammad Sayeed and Former Chief Minister of the State of Jammu & Kashmir, against the defamatory, malicious and scandalous contents of your programme "Arnab Goswami on the Debate at 10" broadcasted on your channel Republic TV on July 5th, 2019 at 10 PM and highlighted with the hashtag "**#KashmirFightsTukdeGang**" and also published on your channel's official YouTube account "Republic World" which has over 1,225,000 subscribers, and which were published with the sole intention to cause harm to the reputation of my client.

SUB: LEGAL NOTICE DATED 06/07/2019.

Dear Mr. Goswami,

I have been instructed to state by my aforementioned client, Ms. Mehbooba Mufti D/O Late Mufti Mohammad Sayeed and Former Chief Minister of the State of Jammu & Kashmir:



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1. That my client was formerly the Chief Minister of the State of Jammu & Kashmir and at present is the President of Jammu and Kashmir People's Democratic Party (PDP). My client has always been honest in her dealings and has led a simplistic lifestyle. Her scrupulous honesty has reflected in her political career as well and she has never hesitated in speaking the truth; no matter how bitter it would seem to many. My client, following in the footsteps of her late father, Mr. Mufti Mohammad Sayeed, has worked tirelessly and with utmost honesty for the people of J&K. Mr. Mufti Mohammad Sayeed has always been regarded as the patron of the '*healing touch*' policy of the government towards the people of J&K and my client too has been working on similar lines. My client is credited as the first woman Chief Minister of the State of Jammu and Kashmir and is considered as a role model by many.
2. That you on July 5th, 2019 presented and broadcasted your prime time programme "*Arnab Goswami on the Debate at 10*" wherein you had invited multiple guests to debate over the topic highlighted through the hashtag "**#KashmirFightsTukdeGang**". The entire programme was also published on your channel's official YouTube account "*Republic World*", which has over 1,225,000 subscribers, on July 5th, 2019. The programme in question contained statements about various political persons of the State of J&K; however, a series of statements made by you were false, biased and targeted to malign the reputation of my client. The statements so made seemed to have been made with the sole intention to cause harm to the reputation of my client, as these are completely false, baseless and highly defamatory in nature.

The statements so made by you about my client in the said programme are reproduced here-in-below verbatim:



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“...aur Mehbooba Mufti jo hai who first class fly karti hai Mumbai mei, aur lavish shopping trips, you know, you know Sushil Pandit, itna spend karti hai, itna spend karti hai, jo logoun ne dekha hai! Itni...Aur jab aati hai to 5 Star Hotel mei, sara unke liya, pura...pura floor book hojata hai! Itna paisa kahan se ata hai. Ap log Kashmir ke logoun ka khoon kab tak chuseinge...”

3. That the aforementioned defamatory and false statements made by you on your prime time programme have been widely seen, circulated, and shared on other social networking sites and web portals. Your statements project my client as a dishonest person who has made a fortune by deceitful means and is now spending it extravagantly. Right at the onset my client outrightly denies these brazen allegations. My client has had an impeccable political career and never ever has faced any criticism where she has been projected as a dishonest person. Your statements on the said programme are full of lies and even while speaking you are not coherent and it clearly seems that you are making up these statements. Furthermore, the failure on part of both you and your channel as a whole to support these claims with any proof shows the malicious intent behind these statements and further proves that your allegations against my client are baseless.
4. That taking these statements in context of the entire programme it seems that you have tried to compare my client's scrupulous honesty, hard-work and sacrifices for the people of Kashmir as well as her political ideology and approach with the actions and ideologies of those who are her total opposites. Thus, it is evident that you have published these statements with the intent to tarnish the image of my client. You have out of pure malice tried to connect a main stream politician of the state of J&K with other politicians who have a different stand on Kashmir. You have stooped so low that you have labelled my client a 'bloodsucker' of Kashmiri people. This not only harms the reputation of my client



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but also undoes everything that my client has worked for all her life. It is pertinent to mention that your statements hamper the political career of my client.

5. That my client was the ninth Chief Minister of the State of Jammu and Kashmir and was duly elected by the citizens of this country through an efficient and fair electoral process of this democratic nation. The baseless, false and fabricated statements published by you have already been widely circulated and has caused irreparable loss to the reputation of my client who is a renowned public figure.
6. That through the said false, defamatory and mala fide statements you have tried to project my client as a dishonest person who has looted the Kashmiri people and have thus caused irreparable damage to my client's image and reputation as well as to the reputation and standing of the party which she leads.
7. That the failure on your part to support the claims made in your programme with any proof shows your malicious intent and further proves that the allegations against my client are baseless and concocted. These are very serious charges for a person like my client who enjoys immense respect, goodwill and fame in her constituency, state and country. The intentional and full of malice programme presented by you is highly disparaging to the public and political image of my client and hampers her prospects in the public and political sphere.
8. That your statements are an evil attempt at tarnishing my client's image and reputation, which she has tried to build over decades of hard work and honest dedication towards the people of J&K. Your statements with respect to my client in the said programme are outright lies, brazen concoctions and a motivation that goes beyond the attempts at destroying our client's reputation.



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That as explained in the facts and circumstances hereinabove, the incorrect and grave allegations raised by you against my client amount to criminal defamation under Section 499 of the Ranbir Penal Code as well as Indian Penal Code, and is punishable under the penal laws of both J&K and India under Section 500. It is, thus, apparent that you have committed an offense of defamation for which you are liable to make good and compensate my client for the damages to her reputation that she has already suffered and which is continuous in nature. My client empathetically denies any such allegations and the onus lies on you to prove otherwise. Furthermore, you will be held liable for any monetary and legal damages which my client seeks before a court of law.

I, on behalf of my client call upon you and Republic TV to immediately:

- i. Issue an unconditional public apology to my client through print, electronic and social media for the incorrect statements made and allegations levelled against her and by broadcasting the said public apology on Republic TV with the same prominence and frequency as the impugned statements within three (3) days from the receipt of this legal notice.
- ii. Send a written assurance to my office, through a letter or e-mail, within three (3) days from the receipt of this legal notice that both you and your channel will desist from any further defamation of my client and will also ensure that you will apologize for the previous defamatory statements.
- iii. Withdraw and delete the said programme from the "Republic World" official YouTube Channel immediately.
- iv. Refrain from repeating any such acts on any public platform whether through your channel or social media or in any other form.

By this legal notice you are further informed, in clear terms, that upon your failure to comply with the aforementioned directions within three (3) days from the receipt of this notice, my client will be constrained to initiate both civil and

SHEIKH RIZWAN JAVEED



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criminal actions against you and your channel in accordance with law. In such a situation you are cautioned that the entire legal recourse that my client may initiate against you shall be entirely at your own risk and cost.

Copy of the instant legal notice is retained in my office for future actions and references.

Sincerely yours,

Sheikh Rizwan Javeed,

Advocate.