

HATE SPEECH CELL
ANNUAL REPORT 2025-26

KARWAN E MOHABBAT

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INTRODUCTION: CONTEXT & BACKGROUND

Karwan e Mohabbat was established in 2017, in response to the growing incidents of lynchings, hate crimes, and targeted violence against religious minorities and other marginalised and vulnerable communities in India. Over the years, the Karwan campaign had worked closely with survivors and families affected by targeted violence by providing legal support, financial assistance, mental health support and educational support to the victim families' children. The work of Karwan has always been guided by the belief that justice is not limited to courtrooms. Families affected by hate violence often require support for years as they cope with loss, pursue legal cases, and try to rebuild their families and dependents.

Through this work, Karwan developed a deeper understanding of the conditions that often precede hate violence. In case after case, *it became clear that violence rarely emerged without warning.*

Long before incidents of lynching, attacks of socio-economic boycotts took place, there were often sustained campaigns of hate speech, fake & misinformation, rumours, and public narratives frequently portrayed minorities as threats to religion, culture, national security, and social harmony. Over the time, repeated exposure to such messages helped create an atmosphere in which prejudice, exclusion and hostility became increasingly normalised. This recognition led to the establishment of the Karwan e Mohabbat Hate Speech Cell in 2025. While continuing its commitment to supporting survivors of hate crime, Karwan recognised the need to also address the conditions that help make such violence possible.

The year 2025-26 showed that hate speech is no longer something that happens only once in a while in India. It has become a regular part of political and social life. The rise in incidents across the country shows that hate speech is not just a matter of anger or prejudice. It is often used as a way to influence people, build support, and shape public opinion. [Centre for the Study of Organised Hate \(CSOH\)](#) recorded more than a thousand hate speech events in 2025 alone. That number matters not only because it is large, but because it shows how public discourse is changing. Hate speech today is more common, more organised, and more openly spoken than before. Many speeches that earlier would have stayed local now spread very quickly through social media and digital news platforms, reaching people across the country within hours.

THE CONCEPTION OF HATE SPEECH CELL

The Karwan e Mohabbat Hate Speech Cell was created with the understanding that if hate violence is to be challenged effectively, it is equally important to challenge the rhetoric narratives and public discourse that often comes before it. The creation of the Hate Speech Cell was also shaped by growing concerns about the changing nature of public opinion in India. Across political parties, religious gatherings, news debates, social media platforms, election gatherings, and even family WhatsApp groups hate speech was increasingly visible and in many cases it has been increasingly accepted. Speeches or statements that would once have attracted widespread criticism were often being repeated openly and amplified through social media and electronic media. The normalisation of such language raised important questions about accountability, democratic values, and the protection of the Muslim community, other religious minorities and marginalised communities. The Hate Speech Cell was therefore established as a dedicated initiative to challenge the normalisation of hate speech in today's India. It would do this by documenting, monitoring, analysing but most importantly by legally challenging the spread of hate speeches across the country.

The Hate Speech Cell's work is based on the objective that hate speech is not simply a matter of offensive language. It can contribute to discrimination, deepen social divisions, fuel mistrust between different communities and create conditions in which violence becomes easier to justify. Addressing hate speech is therefore an important part of preventing broader forms of social harm.

A central objective of the Cell is *strategic litigation*. The Cell identifies dangerous and influential instances of hate speech, files complaints before relevant authorities, pursues legal remedies when action is not taken, and seeks to strengthen accountability within existing legal frameworks. Through these efforts, the Cell aims not only to challenge individual incidents but also to encourage public institutions to fulfil their constitutional and legal responsibilities.

Election monitoring has emerged as another major area of work. Evidence from across different states shows that hate speech often rises during election periods. Political competition can create incentives for divisive narratives that seek to mobilise voters through fear, suspicion, and identity-based appeals. The HS Cell monitors such developments, documents incidents, supports legal interventions, and works with volunteers and local networks to track hate speech during election periods.

The Cell also places significant emphasis on legal education and public awareness. One outcome of this effort has been the development of the Hate Speech Manual, a practical resource designed for lawyers, activists, journalists, students, researchers, and community members. The Manual seeks to bridge the gap between legal provisions and lived realities by explaining both the law and the practical challenges involved in pursuing accountability for hate speech.

The work of the Hate Speech Cell is closely linked to the broader mission of Karwan e Mohabbat. The campaign's long engagement with survivors of lynching and hate violence provides important insights into how hateful narratives operate and how they affect communities over time. Lessons learned through supporting survivors often inform the Cell's approach to monitoring and intervention. Similarly, the documentation and legal work undertaken by the Cell contributes to a deeper understanding of the environments in which hate violence emerges.

The Cell's work is strengthened through collaborations with lawyers, researchers, journalists, grassroots volunteers, civil society organisations, and community leaders across different states. These partnerships help identify incidents, support documentation efforts, monitor local developments, and ensure that voices from affected communities remain central to the work. Collaborations with organisations documenting hate speech and defending constitutional rights have also helped strengthen the Cell's capacity to respond to emerging challenges.

Since 2025, the hate speech cell has gradually expanded its work from a small initiative into a dedicated program focused on accountability, documentation, research, legal intervention and public education. Hate speech continues to evolve, creating new discourses, finding new followers through political and religious events. Yet, the experiences of recent years have reinforced the importance of addressing hate not only when it results in violence but also when it first begins to take shape and space in public.

The Hate Speech Cell represents Karwan's efforts to engage with this challenge. It builds on the campaign's longstanding commitment to justice, dignity, equality, equity and solidarity with those affected by hate. By addressing hate crime, the Karwan seeks to respond not only to the consequences of hate but also to some of its earliest warning signs.

1. Our Collaborators

The growth of the Hate Speech Cell was not possible through legal interventions alone. From the beginning, it became clear that documenting, verifying and legally pursuing hate speeches across different states would require a much stronger and wider network of volunteers, organisations, researchers, lawyers, etc. Over the years the Hate Speech Cell gradually built these relationships, which became and played an important part.

One of the challenges in hate speech work is identifying and verifying incidents quickly before they disappear from public view. A large number of hate speech today circulates through social media platforms, local and national news media channels. Most of the speeches remain online only for a short time, while others are edited, deleted or circulated without context. This makes documentation difficult and time sensitive.

The Hate Speech Cell benefited from continuous engagement with the **Indian American Muslim Council (IAMC)** and **Hindus for Human Rights**. Throughout the year, both organisations remained involved in discussions around strategy, priorities, and future directions of the project. Their experience in advocacy, documentation, and public engagement provided useful perspectives at different stages of the work. Many of the challenges faced by the Cell were discussed collectively, allowing for reflection and course correction whenever necessary.

The **Centre for the Study of Organised Hate (CSOH)** also played an important role in strengthening the work of the Hate Speech Cell. Through its strong monitoring and documentation efforts, CSOH regularly shared information relating to online hate speech and emerging trends across different parts of the country. Their technical support helped the HS Cell identify hate speeches, verify videos, cross check information and establish authenticity before complaints are filed. This became particularly important in cases where online content was later removed or doctored. The collaboration helped strengthen both the speed and the quality of documentation. The relationship with CSOH extended beyond documentation. Regular discussions around emerging patterns of hate speech, developments during elections, and legal responses helped sharpen the overall direction of the work. These conversations often helped the Cell think through difficult cases and understand larger trends that were emerging nationally.

At the state level, partnerships became equally important. During preparations for the Bihar elections and subsequent legal interventions, **Janman** emerged as an important local partner. Their understanding of the local context, connections with communities, and assistance in

pursuing complaints proved valuable in strengthening the work in Bihar. Several interventions would have been far more difficult without local support and local knowledge. Also, the **Eva Foundation** and its network of volunteers helped the Cell remain connected to developments on the ground. Their presence in different communities often made it possible to identify incidents that would otherwise remain undocumented. Local information, particularly in rural areas and smaller towns, continues to be one of the biggest challenges in hate speech documentation, making such networks extremely important. The support and guidance received from **People's Union for Civil Liberties (PUCL)** members at different stages also contributed significantly to the work. Discussions around civil liberties, constitutional rights, and legal strategy helped strengthen the HS Cell's understanding of how hate speech intersects with broader questions of democratic accountability. The **Bharatiya Janata Kisan Morcha** also helped expand local outreach and build relationships in areas where the HS Cell previously had limited presence.

Diaspora in Action for Human Rights and Democracy (DAHRD) has been an important partner in the work of the Hate Speech cell. Their continuous support, guidance and intense discussions helped us to better understand the changing nature of hate speech and the legal and socioeconomic challenges around it. It has played a significant role in developing the hate speech manual by sharing their inputs at different stages of its developments. Their inputs and suggestions on legal strategy, international advocacy helped us in the improvement of both the manual and the overall direction of the hate speech cell's work throughout the year.

At the centre of all these efforts were the local volunteers of Karwan. Across Bihar, Assam, Jharkhand, Uttar Pradesh, Delhi, Haryana, Karnataka, and other states, volunteers continued to monitor speeches, collect information, verify incidents, support documentation, and connect the Cell with affected communities.

2. Advisory Group

Hate speech creates divisions where people once lived together with trust. It encourages citizens to see fellow citizens as enemies. It weakens social bonds and shifts public attention away from shared concerns towards fear and suspicion. When communities are repeatedly described as threats, it becomes easier to justify discrimination, exclusion, and sometimes violence against them. The concern is not only about individual speeches but about the larger environment they create. As these challenges became more complex, it became clear that the Hate Speech Cell needed wider support, deeper reflection, and a broader range of perspectives.

Legal interventions remain important, but law alone cannot fully address a problem that is social, political, technological, and cultural at the same time. Understanding these changes requires conversations across disciplines and experiences. It was with this understanding that the International Advisory Group was constituted in January 2026. The objective was not simply to create a formal advisory body but to build a space where people working on democracy, human rights, media, technology, law, social justice, and minority rights could collectively think through the challenges posed by hate speech. The group helps us reflect on larger developments, identify emerging concerns, and strengthen the long-term direction of the work.

The formation of the advisory group was supported by relationships that the Hate Speech Cell had already begun building with organisations such as the **Indian American Muslim Council (IAMC)**, **Diaspora in Action for Human Rights and Democracy (DAHRD)**, **Hindus for Human Rights (HHR)**, and the **Centre for the Study of Organized Hate (CSOH)**. These organisations have contributed in different ways through discussions, feedback, strategic thinking, and ongoing engagement with the work of the Cell.

The International Advisory Group brings together a diverse set of voices, including academics, lawyers, journalists, researchers, activists, and community leaders from India and abroad. Members include Deb Mukharji, Zoya Hasan, Rasheed Ahmed, Ashutosh Varshney, Amir Ullah Khan, Azam Khan, Indrajit Roy, Piergiuseppe Parisi, Joanna Perry, Mohsin Alam, John Dayal, Osama Manzer, Nizamuddin Ahmad Siddiqui, Suroor Mander, Ritumbra Manuvie, Sunita Viswanath, Raqib Hameed Naik, Prashant Bhushan, Vinay Lal, Aakar Patel, Hilal Ahmed, Kunal Purohit, Owaiz Kolia Mohammed, Mohan Dutta, Haroon Kasim and Harsh Mander.

One important outcome of these discussions has been the development of the **Hate Speech Discussion Series**. The idea emerged from a shared concern that conversations on hate speech often remain limited to immediate controversies while larger questions receive less attention. The discussion series seeks to create space for deeper engagement with issues such as elections, digital platforms, majoritarian politics, caste discrimination, communal polarisation, media narratives, and the impact of hate speech on everyday life.

The establishment of the International Advisory Group reflects a simple but important understanding: the challenge of hate speech is growing, and so must the efforts to respond to it. As hate speech becomes more organised, more visible, and more influential, it poses difficult

questions about the future of democracy, equality, diversity and social coexistence in India. The advisory group has become one of the spaces where these questions can be discussed openly, critically, and collectively, drawing on experiences from different regions and different parts of the world.

3. Objectives of the Hate Speech Cell

The Cell was envisioned as a multi-pronged intervention, combining grassroots monitoring, strategic legal action, electoral vigilance, and public legal education. Its core mandates include:

1. Assisting in the grassroots monitoring and documentation of hate speech through a nationwide network of volunteers;
2. Pursuing strategic litigation against egregious and dangerous hate speech;
3. Closely monitoring hate speech during national and state elections;
4. Systematic research on hate speech in India; and
5. Creating accessible and interactive legal education and knowledge resources to enable citizens to challenge hate speech.

Grassroots Monitoring and Documentation of Hate Speech

One of the first challenges in addressing hate speech is simply knowing where it is taking place. A significant amount of hate speech occurs in local political meetings, religious gatherings, district-level events, regional media, and social media spaces that rarely attract national attention. Many incidents go undocumented and disappear before any action can be taken.

For this reason, the Hate Speech Cell prioritised building a network of volunteers across different states. Volunteers help identify incidents, collect information, verify facts, and understand local contexts. This approach is particularly important in a country as large and diverse as India, where hate speech often appears in local languages and regional settings. Without grassroots documentation, many incidents would remain invisible. This objective is important because documentation is often the first step towards accountability. It helps create evidence, identify patterns, and ensure that incidents are not forgotten or ignored.

Strategic Litigation Against Dangerous Hate Speech

The second objective emerged from a concern that many serious instances of hate speech were going unchallenged. Public figures were often making inflammatory statements, spreading

hostility against communities, or using divisive rhetoric without facing meaningful consequences.

Strategic litigation was adopted as a way of responding to this challenge. The purpose is not only to pursue individual cases but also to test legal remedies, strengthen accountability mechanisms, and encourage public institutions to fulfil their responsibilities. Even in situations where convictions may be difficult, legal interventions help ensure that hate speech does not pass entirely without challenge.

In the current context, strategic litigation remains important because it creates a record of resistance against the normalisation of hate. It sends a message that public speech has consequences and that constitutional protections apply to all communities.

Monitoring Hate Speech During Elections

The decision to focus on elections emerged from the increasing hate speeches during election periods. Election campaigns create intense competition for public attention, and political actors frequently use identity-based narratives to mobilise support. The Hate Speech Cell observed this pattern during the Delhi Assembly elections and again during preparations for the Bihar Assembly elections. Similar trends have also been documented in other states. During election campaigns, discussions about employment, education, healthcare, agriculture, and governance are often pushed aside by narratives centred on religion, identity, fear, and division.

Monitoring elections is therefore important because election periods can have a lasting impact on public discourse. Narratives introduced during campaigns often continue long after voting has ended. By documenting and challenging hate speech during elections, the Cell seeks to protect democratic processes and encourage issue-based public debate.

Legal Education

The final objective emerged from a simple observation. Many people wanted to challenge hate speech but did not know where to begin. Lawyers, activists, journalists, students, and ordinary citizens often struggled to understand the legal framework, complaint procedures, and available remedies.

This gap became especially visible during field visits and interactions with community groups. People frequently asked basic questions about what constitutes hate speech, where complaints can be filed, what evidence is required, and what legal options are available when authorities

fail to act. The development of legal education resources, including the Hate Speech Manual, seeks to address this gap. Making legal knowledge accessible is important because accountability cannot depend only on lawyers and experts. Citizens themselves must be able to understand their rights and the available mechanisms for challenging hate speech.

Taken together, these four objectives reflect a broader understanding of how hate speech operates in contemporary India. Documentation helps make incidents visible. Litigation seeks accountability. Election monitoring focuses on moments when hate speech often intensifies. Legal education empowers citizens to respond. Each objective addresses a different part of the problem, but together they form a more comprehensive response to the growing challenge of hate speech in public life.

This report evaluates the HSC's work in light of these mandates, mapping both achievements and limitations, and situating them within the broader ecosystem of civil society efforts against hate speech.

STRATEGIC LITIGATION: INCEPTION & INTERVENTION

The debate on freedom of speech and hate speech has long remained fractured, including within progressive and democratic spaces. Yet, across international human rights law and in most constitutional democracies, there is now broad recognition that certain forms of speech inflict profound harm. Hate speech does not merely communicate ideas; it can assault the dignity, safety and equal citizenship of individuals and communities. It undermines the conditions necessary for people to live with respect, belonging and security.

Indian law has long recognised these dangers. Since the colonial period, legal provisions have existed to curb speech that promotes enmity and threatens public order. Today, these protections find expression in various provisions of the Bharatiya Nyaya Sanhita, 2023, including Sections 196, 197, 299, 302 and 353. These provisions criminalise forms of expression and conduct that have the potential to foment communal disharmony, incite hostility, and disturb public peace. However, the implementation of these laws has historically been fraught with challenges. Civil liberties advocates, human rights defenders and social movements have often expressed concern that these provisions were selectively invoked to suppress legitimate dissent and democratic expression, rather than to address genuine instances of hate speech. This scepticism was not without basis. For many years, the law appeared more readily available to regulate criticism of power than to confront organised campaigns of hatred directed against vulnerable communities.

The years following 2015 marked an important turning point. As hateful rhetoric increasingly entered mainstream public discourse as articulated by political actors, religious leaders, media personalities and other influential voices, the limitations of existing responses became starkly visible. The normalisation of public expressions of prejudice, exclusion and hostility demanded a rethinking of how these legal provisions could be understood and utilised. It became necessary to ask whether the same laws that had often been viewed with suspicion could instead be mobilised to protect constitutional values of equality, fraternity and human dignity.

It is within this context that strategic litigation emerged as an important intervention. Strategic, or impact litigation seeks not merely to resolve individual disputes but to advance broader social change. It uses carefully selected cases to test institutions, clarify legal principles, establish accountability and strengthen public understanding of rights.

Karwan had already accumulated substantial experience in providing legal support to survivors and families affected by hate crimes and lynchings. Building upon this work, an important

question emerged: could the legal framework governing hate speech be used proactively to challenge the growing architecture of organised hatred in public life?

The Hate Speech Cell was established to pursue this inquiry as there remained a *near absence of sustained litigation specifically directed at holding hate speakers accountable* through the existing legal framework.

Through strategic litigation, the Cell seeks to examine whether India's legal and institutional framework, including the police, prosecuting agencies, courts and other public institutions, is capable of responding effectively to the challenge of hate speech. Equally important, this work aims to create a precedent by creating a detailed public record of the present moment: a body of legal documentation that future generations may look back upon to understand how hatred was propagated, resisted and adjudicated in contemporary India.

While important documentation efforts by organisations such as India Hate Lab and the Centre for the Study of Organised Hate have significantly advanced public understanding of the scale of the problem, the Hate Speech Cell adopted a distinct role. It focused on identifying incidents that meet the threshold of hate speech under both domestic law and internationally recognised standards, including the Rabat Plan of Action. The objective was not only to seek legal remedies in individual cases, but also to expose recurring patterns of institutional inaction, selective enforcement and systemic failures within the criminal justice system.

This section of the report outlines the team, design and implementation of the Hate Speech Cell's strategic litigation initiative during the reporting year. It describes the rationale behind the intervention, the methodology adopted for identifying and pursuing cases, the dedicated team of lawyers and volunteers who sustained this work, and the legal strategies employed to seek accountability for hate speech. It also reflects on the opportunities and challenges encountered in engaging with the criminal justice system

Behind every case stands a small group of lawyers, researchers and volunteers who have chosen to persist in a difficult and often discouraging struggle. Their commitment has been central to sustaining this effort to challenge organised hatred through the rule of law.

THE DESIGN OF STRATEGIC LITIGATION

1. Selection of cases

The cases pursued by the Hate Speech Cell were not selected randomly. Rather, they were chosen through a careful and purposive process designed to build a representative body of litigation that reflects the many forms through which hate speech manifests across India. The selection of cases was guided by the following clearly articulated factors:

- a. **Dangerous Hate Speech:** Priority was accorded to the most egregious forms of hate speech, particularly instances involving explicit calls for violence, genocide, mass sexual violence, ethnic cleansing, social and economic boycotts, or other forms of incitement directed at vulnerable communities. Such speech carries the greatest potential to translate prejudice into organised harm.
- b. **Influential Hate Speech:** Cases were selected across different levels of influence, including nationally prominent figures, religious gurus as well as local leaders. Experience demonstrates that while nationally amplified hate speech shapes public discourse, local hate speech often produces immediate and devastating consequences for targeted communities living in conditions of heightened vulnerability.
- c. **Recurrence and Regularity:** Particular attention was given to individuals who repeatedly engage in hate speech. By identifying and challenging habitual offenders, the project seeks to address not isolated incidents but the sustained normalisation of hatred that gradually reshapes public culture and weakens democratic norms.
- d. **Hate Speech during elections:** Election periods often witness an intensification of communal polarisation and inflammatory rhetoric. Cases arising during electoral processes were prioritised because of the heightened risk that hate speech poses to democratic participation, social cohesion and the integrity of the electoral process itself.
- e. **Post-Facto Violence:** Lastly, we intended to also prioritise those cases where incidents of physical violence, communal unrest, or targeted attacks have occurred in the aftermath of the hate speech. Such cases underscore the direct and tangible consequences of unchecked incitement and strengthen the need for legal intervention.

2. Modus Operandi: The Process & Trajectory of Strategic Litigation

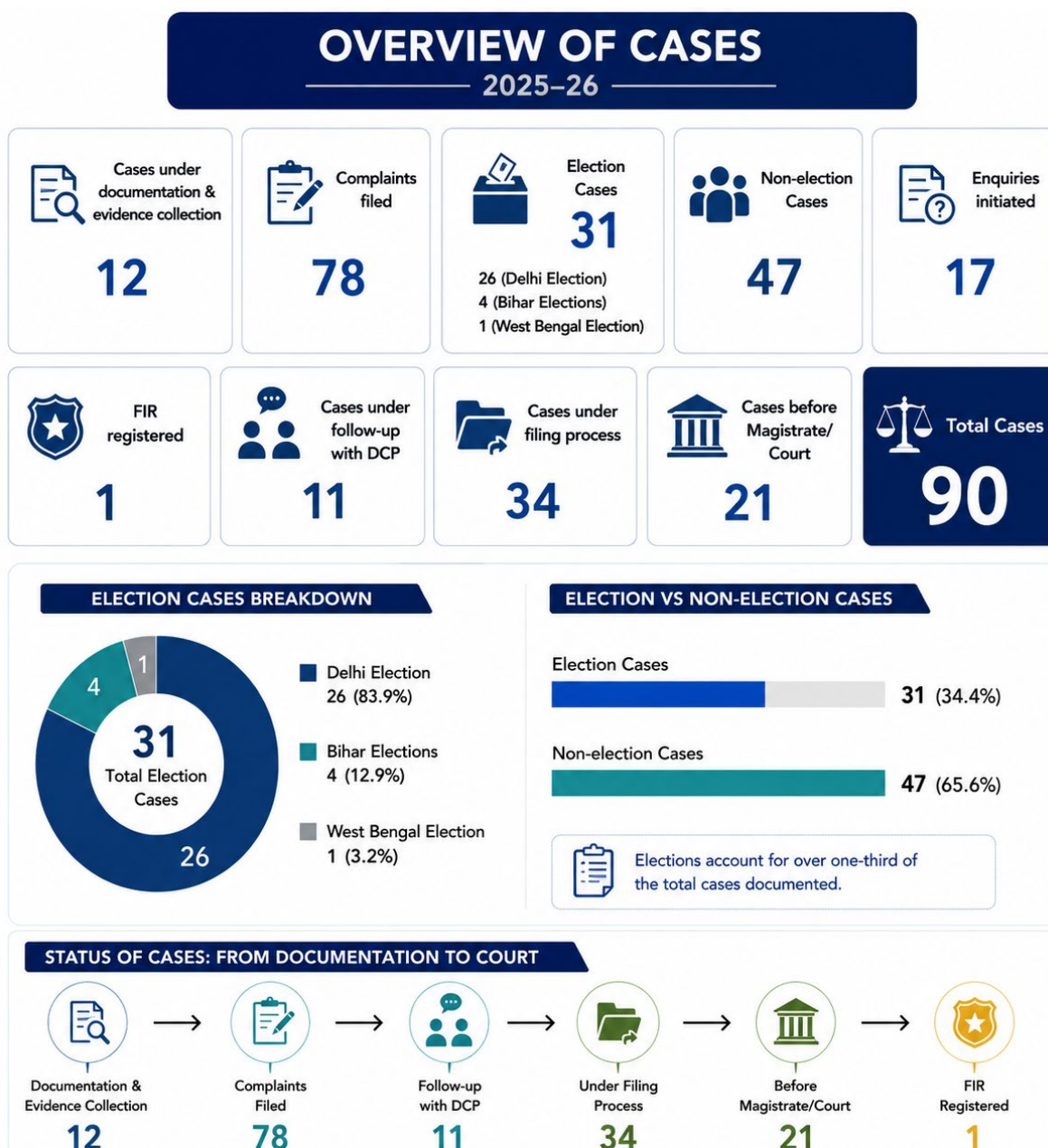
Every case pursued by the Cell follows a carefully designed process that combines rigorous documentation, legal intervention and sustained engagement with the criminal justice system.

- a. **Gathering & Verifying details of the incident:** The first stage involves the careful collection and verification of information relating to the hate speech incident. This includes identifying and securing audio-visual recordings of the speech, transcribing the content verbatim, and translating it into English where necessary. Simultaneously, the Cell undertakes preliminary research on the speaker, including their public role, political or organisational affiliations, history of prior hate speech or communal mobilisation, and any previous legal actions. At this stage, the objective is to assemble the minimum yet sufficient factual foundation required to initiate legal proceedings, while ensuring accuracy and evidentiary integrity.
- b. **Identifying the complainant:** Identifying individuals willing to act as complainants has emerged as one of the most significant challenges in pursuing hate speech litigation. The prevailing environment of fear, intimidation, and anticipated retaliation has made it exceedingly difficult for ordinary citizens to step forward. Volunteers and lawyers associated with the Hate Speech Cell operate within a deeply hostile and intimidating legal ecosystem, particularly when complaints are directed against powerful political or religious figures. As a result, all complaints filed thus far have been instituted in the names of Mr. Harsh Mander and Ms. Suroor Mander, who have assumed this responsibility to ensure that egregious hate speech does not go legally unchallenged.
- c. **Drafting complaints:** The Hate Speech Cell's lawyers prepare comprehensive complaints that clearly set out the factual narrative of the incident, invoke the appropriate statutory provisions, and cite relevant judicial precedents to foreclose misinterpretation or dilution of the allegations by the police. Particular attention is paid to anticipating common modes of institutional evasion, including misreading of facts or claims of insufficient evidence. To further strengthen the evidentiary basis, recordings of the hate speech are annexed in CD or pendrive format, thereby pre-empting any later assertion by law enforcement authorities that no verifiable evidence of the incident could be located.
- d. **Monitoring the enquiries & FIRs:** Following the submission of complaints, the Cell closely monitors whether the police initiate the legally required process. Under the

Bharatiya Nagarik Suraksha Sanhita, information relating to cognisable offences must ordinarily result in the registration of a First Information Report (FIR). Since offences relating to hate speech often fall within cognisable categories, the law imposes a clear obligation upon the police to act. In practice, however, reluctance to register FIRs in hate speech cases remains widespread. The Cell therefore undertakes systematic follow-up with police authorities, documenting responses, delays and instances of inaction. This stage often reveals the first indications of institutional resistance.

- e. **Escalation to Higher authorities:** In cases where no enquiry is initiated or where police responses are delayed or evasive, formal reminders are sent to senior police officials such as Deputy Commissioner of Police of the area and other competent authorities. Section 173(4) states that when a police officer refuses to record the information given as per sub-section (1), the complainant may send the substance of such information to the Superintendent of Police, who, if satisfied that the information discloses a cognizable offence, may direct investigation. These communications are intended both to prompt action and to create a documented trail of institutional inaction, which becomes critical in subsequent judicial proceedings.
- f. **Recourse to the Magistrate's Court:** Where police authorities continue to fail in discharging their legal obligations, the Hate Speech Cell proceeds to approach the jurisdictional Magistrate's Court to petition for the mandatory registration of First Information Reports (FIRs). Applications are filed seeking judicial directions for the mandatory registration of FIRs and the initiation of proper investigation.
- g. **Appearing & Arguing before the court:** The final stage involves appearing before the courts to argue these matters. Lawyers representing the Hate Speech Cell present detailed submissions addressing both the substance of the hate speech and the procedural failures of law enforcement agencies. Through these arguments, the Cell seeks not only relief in individual cases, but also to expose systemic patterns of non-compliance and institutional reluctance.

Overview: Key Statistics on Implementation & Intervention



The numbers in this section are the specific scope of the HS Cell's work. The 90 cases documented during 2025-26 do not represent the total number of hate speech incidents taking place across India. Instead, they represent a selected set of cases identified for strategic litigation after documentation, verification, legal assessment, and review. The purpose of this approach is not to record every instance of hate speech, which would be practically impossible, but to focus on speeches delivered by people whose influence, public reach, and social impact make them particularly significant for legal intervention and public accountability.

The focus of the Hate Speech Cell has largely been on speeches delivered by influential individuals such as senior politicians, elected representatives, religious leaders, social media influencers, and media personalities. These are people whose words reach thousands, and sometimes millions, of people. When such individuals make hateful statements, the impact is much greater than an ordinary social media post or local conversation. Their words often shape public opinion, influence political discussions, and sometimes even affect how communities view one another. During election campaigns, religious gatherings, social media discussions, news debates, and public meetings, activists/karwan volunteers repeatedly encountered hateful narratives that could not all be taken up for litigation. In many places, once a political leader, religious figure, or influencer makes a provocative statement, hundreds of his followers/supporters begin repeating the same message through videos, speeches, WhatsApp groups, local meetings, and social media platforms. A significant number of cases are also directed towards local actors who hold influence over the regional population, keeping the intervention holistic and strategic.

Each case follows its own trajectory depending on the nature of the speech, the identity and influence of the speaker, the availability of evidence, the response of law enforcement authorities, and the procedural hurdles encountered at different stages of the legal process. A total of 90 cases were taken up during the reporting period. Of these, 78 complaints were formally filed, while 12 cases remain under documentation and evidence collection. The portfolio includes both election-related and non-election matters. Election interventions accounted for 31 cases, comprising 26 cases from the Delhi Assembly Elections, 4 cases from the Bihar Assembly Elections, and 1 case from the West Bengal Assembly Elections. The remaining 47 cases concerned hate speech incidents outside electoral contexts.

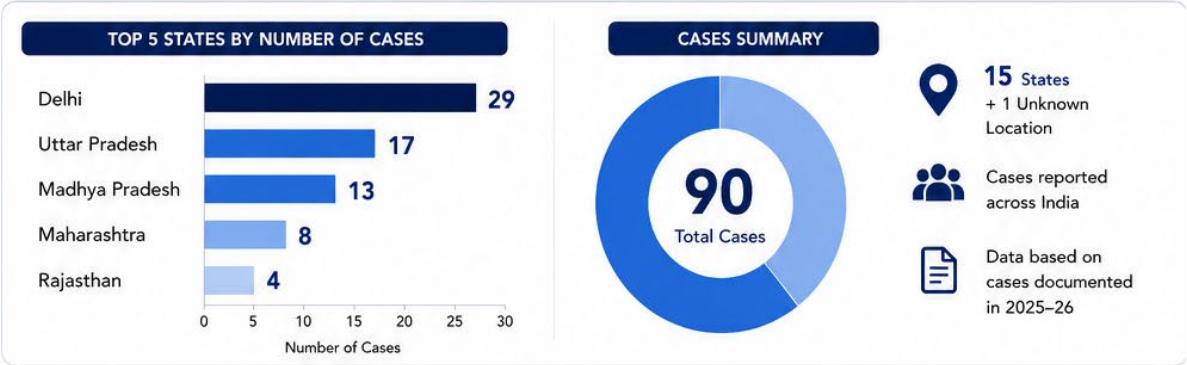
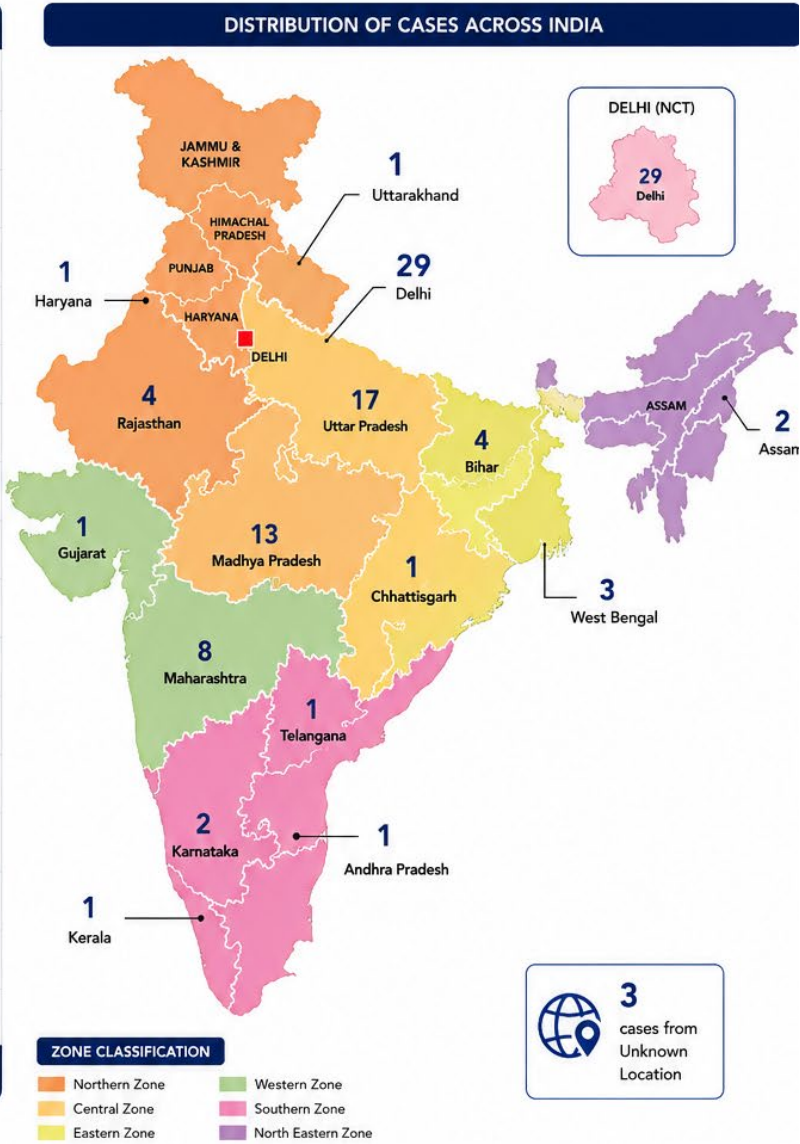
The figures also illustrate the varying stages of legal engagement. 17 cases resulted in police enquiries being initiated, while 11 cases are currently under follow-up with senior police authorities, including Deputy Commissioners of Police. 34 cases are in the process of filing or preparation for filing, and 21 matters are before Judicial Magistrates. During the reporting period, one case resulted in the registration of an FIR.

States Covered

CASES BY STATE / LOCATION

2025-26

State / Location	Number of Cases
Andhra Pradesh	1
Assam	2
Bihar	4
Chhattisgarh	1
Delhi	29
Gujarat	1
Haryana	1
Karnataka	2
Kerala	1
Madhya Pradesh	13
Maharashtra	8
Rajasthan	4
Telangana	1
Uttar Pradesh	17
Uttarakhand	1
West Bengal	3
Unknown Location	3
TOTAL	90



The geographical distribution of cases presented below should be understood as representative of the Hate Speech Cell's interventions rather than as an indicator of the actual prevalence of hate speech across different states. The figures primarily reflect where the Cell was able to identify, document, verify, and pursue cases during the reporting period. They are therefore shaped not only by the occurrence of hate speech but also by factors such as volunteer networks, language accessibility, documentation capacity, availability of evidence, and opportunities for legal intervention. Delhi recorded the highest number of interventions during the year, with 26 election-related complaints arising from the Delhi Assembly elections, in addition to 3 non-election cases. Uttar Pradesh followed with 17 cases, Madhya Pradesh with 13 cases, and Maharashtra with 8 cases. Many of these speeches were also linked to election campaigns, large public gatherings, and highly visible political events.

Rajasthan and Bihar accounted for 4 cases each, while West Bengal accounted for 3 cases. The Cell also intervened in 2 cases each in Assam and Karnataka. Andhra Pradesh, Chhattisgarh, Gujarat, Haryana, Kerala, Telangana, and Uttarakhand accounted for 1 case each.

The concentration of cases in Delhi, Uttar Pradesh, Madhya Pradesh, Rajasthan, Haryana, and Uttarakhand should not necessarily be interpreted as evidence that hate speech is more prevalent in these states than elsewhere. Rather, it partly reflects the organisational realities of the Hate Speech Cell. During the reporting period, the Cell's strongest documentation networks, legal support structures, and volunteer engagement were concentrated in northern and central India, making it easier to identify incidents, collect evidence, prepare transcripts, and pursue legal action.

Recognising these limitations, one of the key priorities for the coming year is to expand the Cell's reach beyond its current geographical concentration. This will involve building stronger partnerships with local organisations, lawyers, journalists, researchers, translators, and volunteers in regions where intervention has so far been limited.

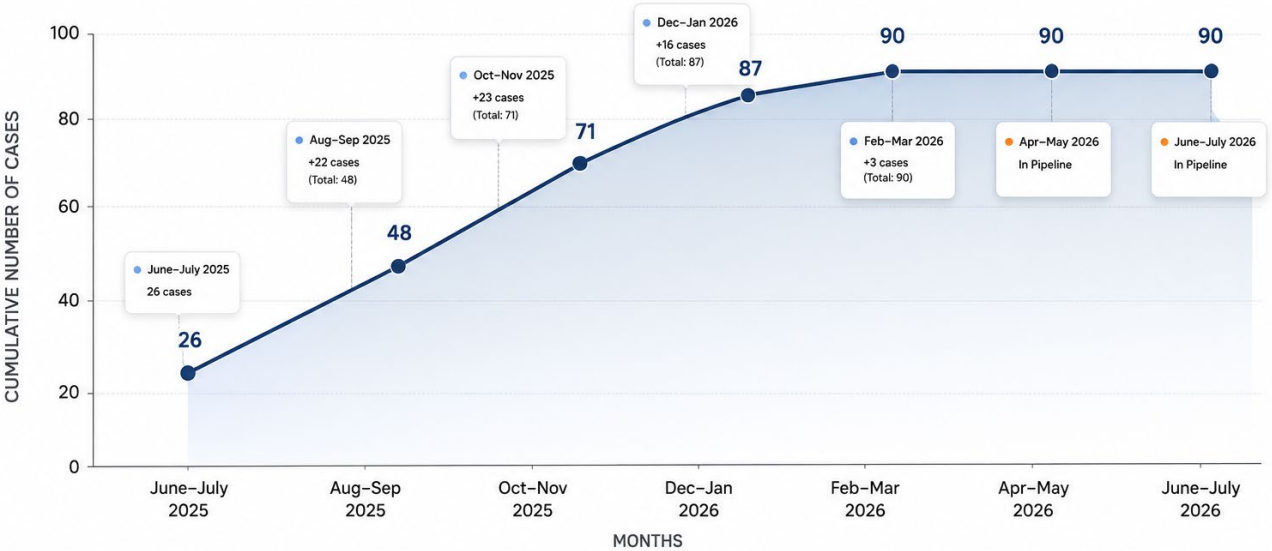
Monthly Docket of Cases Timeline

Months	Number of Cases
June-July 2025	26
Aug-Sep 2025	22
Oct-Nov 2025	23
Dec-Jan 2026	16
Feb-Mar 2026	3
Apr-May 2026	-
June-July 2026	-
Total	90

MONTHLY DOCKET OF CASES TIMELINE

Cumulative Number of Cases Over Time

 TOTAL CASES DOCKETED
90



**TOTAL CASES**
90
Across 14 Months
(June 2025 – July 2026)

**TREND**
Steady Increase
in Cases Over Time

**CURRENT STATUS**
90 Cases Docketed
(as of Feb-Mar 2026)

**PIPELINE**
Apr-May 2026 and
June-July 2026
In Pipeline

Note: Data represents cumulative number of cases docketed. Apr-May 2026 and June-July 2026 are in pipeline.

The graph shows how the number of cases taken up by the HS Cell grew during the reporting period. We began with 26 documented cases in Jun-Jul 2025. As the year progressed, more cases were identified, verified, and prepared for strategic litigation. This increased the total to 48 cases by Aug-Sep, 71 by Oct-Nov, 87 by Dec-Jan and finally 90 cases by Feb-Mar 2026.

The steady rise in the graph reflects the consistent work of the team in documenting serious cases involving influential political leaders, public officials, religious figures, and other high-profile individuals. Since the Cell focuses only on strategic litigation, these 90 cases represent carefully selected matters with significant legal and public importance. They are only a small part of the much larger number of hate speeches made during the year. The increase is more noticeable in the first few months, when a large number of cases were documented and assessed. Towards the end of the reporting period, the pace slowed as greater attention was given to strengthening legal documentation, collecting evidence, and following up on cases that had already been taken up.

The graph remains unchanged after Feb-Mar 2026 because the cases from Apr-May 2026 and Jun-Jul 2026 are still in the pipeline. They are currently being reviewed and will be added to the docket once the documentation process is complete. Overall, the graph shows how the Cell's work steadily expanded over the year, with the cumulative docket reaching 90 strategic litigation cases.

MAJOR CASES PURSUED DURING THE YEAR

Constitutional Functionaries and Public Officials	
	Himanta Biswa Sarma has been the Chief Minister of Assam since 2021 and is a senior leader of the Bharatiya Janata Party (BJP). His speeches have repeatedly portrayed Muslims, particularly Bengali-speaking Muslims, as "infiltrators" and demographic threats, and have targeted the "Miya" community. During the election campaign, the official BJP Assam social media account also shared an AI-generated video showing him aiming a gun at men wearing skullcaps alongside slogans such as "No Mercy" and "Foreigner Free Assam". More recently, the Gauhati High Court issued notice on petitions seeking action over speeches alleged to have targeted the Muslim community.
	Pushkar Singh Dhami has been the Chief Minister of Uttarakhand since 2021 and is a senior leader of the Bharatiya Janata Party (BJP). He is one of the most frequent alleged hate speech speakers of the year. His speeches have repeatedly promoted narratives such as "Land Jihad", "Love Jihad", "Thook Jihad", and demographic change to portray Muslims as a threat. Following the report, Dhami publicly stated that if these remarks were considered hate speech, he would continue making them.
	Suwendu Adhikari is the Chief Minister of West Bengal Legislative Assembly and a senior leader of the Bharatiya Janata Party (BJP). His public speeches have frequently drawn criticism for using communal rhetoric targeting the Muslim community. He has made statements comparing India's actions to Israel's military operations in Gaza, called for similar action against Bangladesh, and

	advised Bengalis not to visit Muslim-majority areas of Kashmir. A hate speech complaint was also filed against him in 2021 after he allegedly referred to Mamata Banerjee as "Begum" and claimed that voting for her would turn West Bengal into a "mini Pakistan".
	Yogi Adityanath has been the Chief Minister of Uttar Pradesh since 2017 and is a senior leader of the Bharatiya Janata Party (BJP). According to documented data from the 2024 General Election campaign, he was the most frequent alleged hate speech speaker, with 74 documented speeches. His speeches have repeatedly portrayed Muslims as "infiltrators", supporters of Pakistan, demographic threats, and as seeking to impose Sharia law in India, reinforcing communal narratives during election campaigns.
	Sadhvi Pragya Singh Thakur is a former BJP Member of Parliament from Bhopal and a controversial public figure who was accused in the 2008 Malegaon bomb blast case. Several of her public speeches have contained strong communal rhetoric, including calls for Hindus to keep sharp weapons to "counter love jihad" and remarks urging people to "cut the heads of the enemy", widely understood as referring to Muslims. She has also repeatedly called on Hindus to protect their daughters from what she described as "love jihad", drawing criticism for promoting communal hostility and violence.
	Giriraj Singh is a senior Bharatiya Janata Party (BJP) leader, Union Minister for Textiles, and Member of Parliament from Begusarai, Bihar. He has repeatedly been at the centre of controversy for making communal remarks targeting Muslims and critics of the BJP. Over the years, he has portrayed political opponents as "pro-Pakistan", claimed that anti-CAA protest sites

	were breeding grounds for terrorism, and, ahead of the Bihar Assembly elections, referred to Muslim beneficiaries of government welfare schemes who did not support the BJP as "namak haram". His speeches have frequently drawn criticism for promoting communal polarisation and deepening religious divisions.
	Ashok Singhal is a senior Bharatiya Janata Party (BJP) leader and serves as the Minister for Health and Family Welfare and Irrigation in the Government of Assam. He has been criticised for making speeches that target the Muslim community, particularly Bengali-speaking Muslims or "Miyas". Among his controversial remarks, he called for Miyas not to be allowed to run shops during Hindu festivals and stated that he had "zero support" for the community, while urging people to minimise social and economic interactions with them. His speeches have drawn criticism for promoting communal exclusion and religious polarisation.
	Nitesh Rane is a Bharatiya Janata Party (BJP) leader and a Cabinet Minister in the Government of Maharashtra. He has repeatedly attracted controversy for speeches targeting the Muslim community. His public remarks have included calls to boycott Muslim street vendors, whom he described as "Jihadis" and "illegal Bangladeshi Rohingyas". He has also promoted narratives such as "Population Jihad" and accused Muslims of attempting to alter India's religious and historical identity. His speeches have drawn criticism for promoting communal hatred and deepening religious polarisation.



T. Raja Singh is a former Bharatiya Janata Party (BJP) MLA from Telangana and is one of the country's most controversial political figures because of his repeated inflammatory speeches targeting the Muslim community. Over the years, he has been booked in multiple cases related to alleged hate speech and communal incitement. His speeches have frequently included derogatory remarks about Muslims, calls for social exclusion, and statements widely criticised for promoting religious hatred and communal polarisation.



Sangeet Som is a former Bharatiya Janata Party (BJP) MLA from Uttar Pradesh and has been a prominent Hindutva leader. He has frequently been associated with inflammatory speeches targeting the Muslim community and has faced several cases alleging hate speech and communal incitement. His public remarks have often promoted communal polarisation, including calls for economic boycotts and narratives portraying Muslims as a threat to Hindus, making him one of the prominent figures associated with communal mobilisation in Uttar Pradesh.



Milind Ekbote is the founder of the Hindu Ekta Aghadi and a prominent Hindutva leader from Maharashtra. He has been associated with several cases involving communal mobilisation and has faced legal proceedings in connection with the 2018 Bhima Koregaon violence. His public speeches have frequently targeted religious minorities, Dalits, promoted communal hostility, and called for social and economic boycotts, drawing criticism for deepening religious polarisation.

Religious Gurus



Yati Narsinghanand is the head priest of the Dasna Devi Temple in Ghaziabad, Uttar Pradesh, and is one of the most controversial religious figures in India. He has repeatedly made public speeches targeting the Muslim community, including remarks widely criticised as calls for violence and genocide. Several criminal cases have been filed against him for alleged hate speech, and his speeches have become a major focus of legal complaints and public debate on communal incitement in India.



Madhuram Sharan Shiva is a Hindu religious preacher known for delivering public speeches at religious gatherings across northern India. Several of his speeches have attracted criticism for targeting the Muslim community through communal and inflammatory rhetoric. His remarks have often promoted narratives portraying Muslims as a threat to Hindus, contributing to religious polarisation and becoming the subject of legal complaints and public scrutiny.



Mahant Raju Das is the chief priest of the Hanuman Garhi Temple in Ayodhya and a prominent Hindu religious leader. He has repeatedly made public speeches containing communal rhetoric directed at the Muslim community, particularly around issues such as religious conversion, "love jihad", and the Ayodhya temple movement. His speeches have attracted criticism for promoting religious hostility and deepening communal polarisation.



Harsha Thakur is a Hindutva activist and public speaker known for delivering communal speeches at religious and political gatherings. Several of her public remarks have targeted the Muslim community through narratives around "love jihad", religious conversion, and demographic change. Her speeches have drawn criticism for promoting communal hostility and contributing to religious polarisation.

Local Influencers



Adv. Ashwini Kumar Upadhyaya is an advocate practising before the Supreme Court of India and a former Bharatiya Janata Party (BJP) spokesperson. He is known for filing several public interest litigations on issues relating to governance, education, and the Uniform Civil Code. He has also attracted controversy for speeches and public statements that have been criticised for promoting communal narratives against the Muslim community. In 2021, he came under legal scrutiny after a speech delivered at Jantar Mantar in Delhi, where slogans calling for violence against Muslims were raised during an event associated with him.



Naziya Elahi Khan is a lawyer, political commentator, and public speaker who has become a prominent voice in television debates and online discussions on issues relating to Muslims and Islam. She has repeatedly made statements portraying Muslims as a threat to national security, supported narratives around "love jihad", "land jihad", and demographic change, and questioned the loyalty of sections of the Muslim community. Her speeches and media appearances have drawn criticism for reinforcing anti-Muslim stereotypes and deepening

	communal polarisation, leading to multiple complaints alleging hate speech.
	Tannu Sharma is a Hindutva content creator and social media influencer known for posting videos and speeches containing communal narratives against the Muslim community. Her content frequently promotes conspiracy theories such as "love jihad", "land jihad", and demographic change, while portraying Muslims as a threat to Hindus and the nation. Through her large online following, these messages have reached wide audiences, leading to complaints alleging hate speech.
	Rishabh Ojha is a Hindutva social media influencer known for posting highly inflammatory content targeting the Muslim community. His videos have promoted extreme anti-Muslim rhetoric, including alleged calls for violence, forced conversion, and dehumanising language against Muslims. His online content has drawn widespread criticism and complaints for openly encouraging communal hatred and violence, highlighting the growing role of digital influencers in spreading hate speech.
	Lalit Sharma is a leader of the Hindu Raksha Dal and has been associated with several inflammatory speeches targeting the Muslim community. He has been accused of making public calls for retaliatory violence, issuing threats against Muslims, and promoting communal hatred during public gatherings. His speeches have led to multiple police complaints and FIRs, drawing criticism for inciting violence and deepening communal tensions.

Organisations/Social Media Platforms



Bajrang Dal is the youth wing of the Vishva Hindu Parishad (VHP) and one of the most prominent Hindutva organisations in India. It has frequently been linked to campaigns targeting the Muslim community, including calls for economic boycotts, opposition to interfaith relationships under the narrative of "love jihad", and mobilisation around religious processions and communal issues. Members of the organisation have been named in several cases involving communal violence, hate speech, and vigilantism, making Bajrang Dal a significant actor in the spread of communal polarisation in many parts of the country.



Vishva Hindu Parishad (VHP) is one of India's largest Hindu nationalist organisations, founded in 1964 to promote and protect Hindu interests. Over the years, it has played a central role in several campaigns centred on religious identity, including the Ram Janmabhoomi movement. The organisation has repeatedly been criticised for speeches and campaigns targeting the Muslim community, including narratives around "love jihad", religious conversion, and economic boycotts. Members and leaders associated with the VHP have frequently been linked to incidents of communal mobilisation and hate speech, making the organisation a significant actor in the spread of communal polarisation in India.



BJP4India is the official X (formerly Twitter) account of the Bharatiya Janata Party (BJP) and serves as one of the party's primary digital communication platforms. During elections and major political events, the account has frequently amplified speeches, campaign messages, and videos containing communal narratives targeting the Muslim community, including themes around "love jihad", demographic

	change, and alleged minority appeasement. Given its large following and nationwide reach, content shared through the account has played an important role in amplifying polarising narratives and extending their impact far beyond physical political rallies.
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DETAILED STATUS & RATIONALE BEHIND PURSUING HATE SPEECH CASES

The following section provides a detailed insight into the present status of the strategic litigation initiatives undertaken by HSC Lawyers and rationale behind pursuing these cases:-

I. Hate Speech Cases outside of election

1. Situ Baruah

The president of the Jatiya Sangrami Sena and a member of Bir Lachit Sena, stands out as a strong and influential leader among the Hindutva forces operating within the state of Assam. His rhetoric and actions have been particularly alarming, as there are several documented instances and experiences of people where he has openly threatened Muslim communities, explicitly demanding that they vacate their homes and localities. This case involves inflammatory speech circulated widely through social media within a sensitive district. The individual's statements carry the potential to incite hostility among local communities. Choosing this case allows us to scrutinize police responsiveness toward highly public digital hate speech in smaller towns.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Sehrish Jafri

Status: Vasant Vihar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Vasant Vihar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

2-3. Vishwa Hindu Parishad (VHP)

This case arose from a public event organised by the Vishva Hindu Parishad (VHP) on 12.08.2025 to mark Krishna Janmotsav and the organisation's foundation day, during which a speaker delivered an explicitly hateful and violent address targeting non-Hindu communities. At the event, the speaker called for a complete social and economic boycott of non-Hindus and issued direct threats of extreme violence, stating that if he ever came to power, he would demonstrate how to "cut and eliminate" non-Hindus from the country. The speech further escalated into demands for the removal of democratic

and constitutional rights, including a call for non-Hindus to be stripped of their voting rights, and for their properties to be seized by the government. Bringing such organizational hate speech under scrutiny helps assess state response to group-based mobilization.

During a Kanwar Yatra event by the Vishva Hindu Parishad (VHP), a speaker again targeted Christians and declared they would demolish every church in the villages, calling them illegal. He alleged that Christian missionaries are involved in religious conversion and are bribing officials to build churches. The Vishwa Hindu Parishad (VHP) is one of the most prominent and influential organizations associated with the wider Hindutva movement. The group has historically been, and remains, highly visible in public discourse, largely due to its consistent advocacy of a strong Hindu identity. In this context, the VHP has gained considerable attention for frequently and publicly articulating strong rhetoric and taking stances that are critically directed against minority communities specially against the Muslim community and Islam across India.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Siddharth Mishra & Adv. Sehrish Jafri

Status: Police complaints were filed at Vasant Vihar Police Station as well as Malviya Nagar Police Station. Reminders are being sent to the Deputy Commissioner of Police, seeking intervention and oversight for these complaints. The matter will be placed before Judicial Magistrate First Class, South District Courts, New Delhi in due course.

4. Vikas Chaturvedi

Vikas Chaturvedi, President of the Rashtriya Hindu Sher Sena, was identified by the Hate Speech Cell for strategic litigation based on the content of his speech and his local political influence in Sitapur, Uttar Pradesh. At a Vishwa Hindu Parishad (VHP) Foundation Day event, he made statements targeting Muslims, invoked the “love jihad” conspiracy theory, and framed Muslim men as threats to Hindu women. During the same speech, he urged members of the audience to “behead any jihadi who looks at your sister,” amounting to an explicit call for violence. Given his position within a Hindutva organisation and his influence at the local level, the case was selected to assess whether law enforcement authorities would act against politically connected individuals who make public calls for violence.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Samvedh Bagavadeshwar

Status: A complaint was filed at the Vasant Vihar Police Station on 15.11.2025, reminders were sent to the Deputy Commissioner of Police. Due to continued inaction, the matter is now placed before Judicial Magistrate First Class, Patiala District Court, New Delhi. The court has called for an Action Taken Report (ATR) from the Police, which will be taken up on the next date of hearing i.e. 29.10.2026

5. Ganesh Shinde

This case was selected for strategic litigation because the speech contained a direct and inflammatory call for collective action against places of worship belonging to a religious minority community. Addressing a gathering organised by the VHP and Bajrang Dal, Ganesh Shinde invoked the language of karseva while referring to what he alleged were “illegal” mosques. He further announced that Bajrang Dal units from across Pune would mobilise to undertake such action themselves if the authorities failed to act within a stipulated period, stating, “We will go there ourselves and do karseva; you know our history.” The Hate Speech Cell considered this to be a serious instance of dangerous hate speech because it combined communal targeting, mobilisation of organised groups, and an implicit threat of direct action against minorities.

Status: A Police Complaint was filed on 23.01.2026 by Adv. Kartik Rajpurohit at Hauz Khas Police Station. Reminders were duly sent to the Deputy Commissioner of Police. In light of continued inaction by the police, the matter was placed before the Jurisdiction Magistrate at Saket Court. The complaint will now be taken up by the court on 13.07.2026 for consideration.

6. Suman Kumar

Suman Kumar, a leader of the Hindu Jagran Manch, was identified by the Hate Speech Cell for strategic litigation due to the content of his speech and his local political influence in Alipurduar, West Bengal. At a public meeting organised by the Hindu Jagran Manch, he delivered a speech targeting Muslims and Christians, alleging organised conspiracies framed as “love jihad,” “land jihad,” “population jihad,” and “health jihad.” During the same address, he incited hostility and violence against

Christians by portraying religious conversions as a coordinated threat. The case was selected to examine whether law enforcement authorities would take action against politically connected local actors who use public platforms to spread communal hostility and incite violence against religious minorities.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Kartik Rajpurohit

Status: Vasant Vihar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Vasant Vihar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

7. Krishna Bhushan Pandey

Krishna Bhushan Pandey, a local Hindutva leader from Sonbhadra, Uttar Pradesh, was identified by the Hate Speech Cell for strategic litigation in order to address the role of local-level actors in spreading and normalising hate. At a Vishva Hindu Parishad (VHP) Foundation Day programme, he made statements alleging that “love jihad” and religious conversions were linked to human and organ trafficking, advancing demonstrably false conspiracy theories. During the same speech, he also promoted violence against individuals he accused of engaging in religious conversions. This case was selected to underscore the importance of pursuing legal action against local organisers and speakers who act as foot soldiers of hate and whose rhetoric often has immediate effects at the community level.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Siddharth Mishra

Status: A detailed police complaint was submitted before Hauz Khas Police Station by Advocate Siddharth Mishra. Despite the lapse of a reasonable period, no effective action was initiated by the police authorities. Consequently, reminders were issued to the concerned officials. In light of the continued inaction, the matter is now being escalated to the judicial stage. An application before the jurisdictional Magistrate was

drafted and is currently under filing, seeking appropriate directions in accordance with law.

8-9. Adesh Soni

Adesh Soni, a local Hindutva leader and social media influencer from Chhattisgarh, was identified by the Hate Speech Cell for strategic litigation due to the repeated and violent nature of his public statements. At a protest rally, he delivered a speech in which he declared that those associated with cow slaughter would be killed, amounting to an explicit threat of violence. During the same address, he alleged that most establishments serving meat in the region were mixing beef and thereby corrupting religious practices, a claim made without any factual basis and designed to inflame religious sentiments. This case was selected to address the role of local-level actors and vigilante figures who mobilise violence through public speech and social media influence. Although not a nationally prominent figure, Adesh Soni exercises influence at the local level and through digital platforms. His role as a cow vigilante figure amplifies the potential impact of his speech, particularly in regions where such rhetoric has historically led to mob violence.

At another gathering held on 18.09.2025 in Kawardha, Kabirdham district, Chhattisgarh, which was organised to demand that cows be accorded the status of “state mother”, Adesh Soni publicly declared that those allegedly involved in cow slaughter would be killed and stated that he and others were prepared to willingly go to jail for committing such acts of violence. During the same event, he, along with monk Jyotirmayanand Swami, characterised the state of Bihar as a “mini-Pakistan” and posed a provocative question as to whether Chhattisgarh should be allowed to become the same. This case highlights the continued use of cow-protection rhetoric as a vehicle for normalising violence and hate speech against religious minorities in public demonstrations.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeshwar

Status: A police complaint has been filed at the Hauz Khas Police Station. In the absence of meaningful police action, reminders are being issued and the matter will be placed before the jurisdictional magistrate in due course.

10. CT Ravi

C.T. Ravi, a senior Bharatiya Janata Party leader, former National General Secretary of the party, and a four-time legislator from Chikmagalur, Karnataka, was identified by the Hate Speech Cell for strategic litigation due to the gravity of the speech and the speaker's position as an influential elected representative. During a Ganesh Visarjan procession in Maddur, he made statements threatening Muslims with "beheading" if they asserted themselves, described them as outsiders, and stated that Hindus could break their legs and heads. He further engaged the crowd by asking what should be done if Muslims built "illegal mosques" and displayed strength, eliciting chants calling for them to be "cut." This case was selected to assess whether hate speech laws are applied consistently when the speaker is a powerful political figure holding elected office.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Chandni Sharma

Status: Vasant Vihar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Vasant Vihar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

11. Shivananda Sattigeri

Shivananda Sattigeri, the State Convenor of the VHP–Bajrang Dal, was identified by the Hate Speech Cell for strategic litigation due to the violent content of his speech and his role as a locally influential Hindutva organiser in Raichur, Karnataka. At a Ganpati Visarjan event, he made statements threatening to chop off the hands of anyone who, in his words, touched Hindu society, temples, or cows. During the same address, he invoked the "love jihad" narrative, alleged forced Christian conversions, and issued threats against those who file legal cases against Hindu leaders, stating that they would be beaten and sent to Pakistan. He further claimed that the police and the army were "all Hindus" and suggested institutional alignment with the Rashtriya Swayamsevak Sangh, thereby reinforcing a sense of impunity. This case was selected to address the

role of local organisers who mobilise violence and intimidate communities and complainants at the ground level.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Chandni Sharma

Status: Vasant Vihar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Vasant Vihar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

12. Satish Kumar

Satish Kumar, the National President of the Gau Raksha Dal, was identified by the Hate Speech Cell for strategic litigation due to the extreme violence explicitly advocated in his public speech. At a Hindu Dharam Sabha organised by Yuva Shakti Manch in Jaipur, Rajasthan, he urged cow vigilantes to shoot and kill individuals allegedly involved in cow slaughter, stating that the killing of 10 to 50 butchers across the country would deter any future targeting of cows. He further called for the beheading of anyone found butchering cows and publicly declared that he would provide legal support to those who carried out such killings. This case was selected in line with the Hate Speech Cell's primary objective of pursuing legal action against speeches that openly advocate murder and vigilante violence.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Kartik Rajpurohit

Status: A detailed police complaint was submitted before Hauz Khas Police Station by Advocate Kartik Rajpurohit. Despite the lapse of a reasonable period, no effective action was initiated by the police authorities. Consequently, reminders were issued to the concerned officials. An application before the jurisdictional Magistrate was drafted and is currently under filing, seeking appropriate directions in accordance with law. Subsequently, police officials informed the complainant that the complaint has been transferred to the competent authorities in Jaipur, where the incident is stated to have

occurred. The matter is presently under follow-up for further action by the concerned police authorities.

13-14. Sadhvi Pragya

Sadhvi Pragya Singh Thakur, a former Member of Parliament from Bhopal, Madhya Pradesh, and a senior leader of the Bharatiya Janata Party, was identified by the Hate Speech Cell for strategic litigation based on multiple incidents of public speech targeting religious minorities. At a Shashtra Pujan and procession organised by the VHP–Durga Vahini–Matru Shakti, she urged Hindus to form groups to verify the religious identities of individuals selling prasad near temples during Navratri and to assault those found to be non-Hindu. During the same address, she referred to Muslims as “jihadis,” stated that they could never regard Hindu women as sisters, and called upon Hindus to exclude non-Hindus from their homes. The presence of firearms, swords, and other weapons at the event heightened the risk associated with these statements. This case was pursued to assess whether hate speech laws are applied consistently to influential political figures whose speeches directly encourage discrimination and violence.

Sadhvi Pragya Singh Thakur, a former Member of Parliament from the Bharatiya Janata Party (BJP), delivered another inflammatory and violent speech at a religious event organised on the occasion of Diwali, during which she targeted interfaith marriages and explicitly incited violence against Hindu women who marry outside their faith. In her address, she urged parents to “break the legs” of daughters who choose to marry “*vidharmis*” (non-Hindus), portraying such marriages as acts of betrayal of religion and family. She repeatedly justified physical violence within families, asserting that strict discipline was necessary to preserve “Hindu values,” and instructed parents not to hesitate in using physical punishment against their children “for their own good. Strategically, pursuing this case is critical as it involves a former constitutional officeholder openly advocating violence against women and legitimising honour-based abuse in the name of religion, thereby testing the enforcement of hate speech and incitement laws against politically influential figures.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Sehrish Jafri & Adv. Siddharth Mishra

Status: A complaint was filed at the Hauz Khas Police Station by Advocates Sehrish Jafri and Siddharth Mishra on 15.11.2025 & 04.12.2025. Reminders were sent thereafter. Due to continued inaction, the matter is now placed before the Judicial Magistrate First Class, Saket Court at New Delhi. The matter has been kept for consideration on the question of territorial jurisdiction. The next date for hearing is 02.07.2026.

15. Harsha Thakur

Harsha Thakur, a local Hindutva influencer from Nashik, Maharashtra, was identified by the Hate Speech Cell for strategic litigation due to the severity, frequency, and public reach of her speeches. At a public event, she openly called for the social boycott of Muslims and repeatedly used derogatory slurs while referring to Muslims as “jihadis.” She propagated the “love jihad” conspiracy theory, used dehumanising language to describe Muslims, and threatened violence against Muslims who attended Garba events or otherwise asserted their presence in public spaces. These statements were not isolated remarks but formed part of a broader pattern of incendiary speech delivered through public platforms and amplified through her online presence. Given her influence at the local level and the direct impact such rhetoric has on everyday social relations and safety, the case was pursued to challenge the normalisation of intimidation and exclusion of Muslims.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Gaurav Kumar

Status: Malviya Nagar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Malviya Nagar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

16. Lawkush Ojha

Lawkush Ojha, BJP Block President of Bhanwapur in Domariyaganj, Uttar Pradesh, was identified by the Hate Speech Cell for strategic litigation due to the severity,

recurrence, and local influence of his statements. At a public fruit distribution event organized by former BJP MLA Raghvendra Pratap Singh, Ojha cited Singh's threat to "chop Muslims like vegetables" if cattle slaughter was not stopped and declared that BJP and Hindu Yuva Vahini members would take violent action against anyone attempting it. These remarks were not isolated but part of a broader pattern of inflammatory rhetoric among local actors that contributes to fear, hostility, and potential communal unrest in the area. Given his leadership position and the platform provided by the BJP at the block level, Ojha's statements have the capacity to influence local followers and normalize violent attitudes towards vulnerable communities.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Tamanna

Status: A police complaint has been filed at Vasant Vihar Police Station by Advocate Tamanna on 15.11.2025, and reminders to the Police officials have been sent. An application before the jurisdictional Magistrate was drafted and is currently under filing, seeking appropriate directions in accordance with law. 17-25. Tannu Sharma

Tannu Sharma, a local leader of the Bajrang Dal and Chief Convenor of the Malwa division in Indore, Madhya Pradesh, has been flagged by the Hate Speech Cell for strategic litigation due to the severity, recurrence, and broad influence of his rhetoric. Sharma has repeatedly called for the beheading of Muslims during Garba events across MP, reinforcing violent communal narratives through multiple public incidents. At a Dandiya Raas event, he likened Muslims to "demons," described them in dehumanizing physical terms, propagated the "love jihad" conspiracy theory, and urged women to emulate Kalka Mata in carrying out violence against Muslims. He further circulated false allegations, including that Muslim children were being trained to attack Hindus and that the "I love Mohammed" campaign was a tool of anti-Hindu hostility. These statements form part of a persistent pattern of incendiary hate speech, amplified through his leadership position, which has the potential to incite immediate violence and reinforce fear in local communities. Given his prominent role in the Bajrang Dal, Sharma's rhetoric holds significant influence over followers, making intervention critical.

Complainant/Petitioner: Harsh Mander & Suroor Mander

HSC Lawyer: Sehrish Jafri, Siddharth Mishra, Kartik Rajpurohit, Sanjukta, and Tamanna, Advs

*Status: Police complaints were filed at Vasant Vihar, Hauz Khas, and Vasant Kunj Police Stations by Advocates Sehrish Jafri, Siddharth Mishra, Kartik Rajpurohit, Sanjukta, and Tamanna. Reminders were sent and magistrate proceedings are awaited to ensure accountability. **Following the complaint, the Vasant Vihar Police transferred the matter to the Indore Police for appropriate investigation, given the location of the alleged incidents. The Indore Police have since initiated preliminary steps in the matter and have directed that the complainant's statement be formally recorded to enable further action against Mr. Tannu Sharma in accordance with law.***

26-32. T. Raja Singh

T. Raja Singh, a legislator from Bhilwara, Rajasthan, is among the most notorious hate speakers in India, with a long-standing record of incendiary rhetoric targeting minority communities. At multiple events, he openly incited violence, urging Hindus to kill individuals labeled as “love jihadis” or pastors allegedly involved in religious conversion, asserting that such acts were preferable to relying on law enforcement. He propagated the “love jihad” conspiracy theory, advised parents to poison daughters who could not be “recovered,” and called on the Chief Minister to announce bounties for killing those accused of “love jihad,” religious conversion, or being Rohingya or Bangladeshi settlers. Singh also advocated shooting multiple “mullas” to instill fear, demonstrating the extreme gravity of his hate speech. These statements are part of a recurring and persistent pattern of inflammatory public speech that exploits his political position to amplify communal tension and legitimize violence. Given his national and regional influence, Singh’s rhetoric has a direct and severe impact on vulnerable communities, making strategic litigation critical.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Sanjukta, Siddharth Mishra, Kartik Rajpurohit, and Tamanna

Status: Police complaints were filed at Vasant Vihar, Hauz Khas, and Vasant Kunj Police Stations by Advocates Sanjukta, Siddharth Mishra, Kartik Rajpurohit, and Tamanna. Reminders have been sent to higher authorities. An application for

registration of FIR under Section 175 (3) BNSS was drafted and is currently under filing, seeking appropriate directions.

33-35. Madhuram Sharan Shiva

Madhuram Sharan Shiva, a far-right monk and leader of the armed monk group Shiva Shakti Akhada in Kanpur, Uttar Pradesh, has been identified by the Hate Speech Cell for strategic litigation due to the severity, recurrence, and local influence of his statements. At multiple events, Shiva urged attendees to arm and train their sons to “take shastra” and “kill the jihadis” in order to protect dharma, framing violent preparation as necessary for the continuation of religious events. These remarks form part of a broader, persistent pattern of anti-Muslim and anti-Christian rhetoric delivered across Uttar Pradesh, reflecting both the high gravity of his hate speech and its potential to incite physical violence. Through his leadership of a militant monk group and association with the Vishva Hindu Parishad, Shiva wields considerable influence in mobilizing followers, making local communities particularly vulnerable to intimidation and targeted attacks.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Samvedh & Adv. Tamanna

Status: Police complaints have been filed at Vasant Kunj Police Station. Reminders are being sent to higher authorities. The matter will be now placed before Judicial Magistrate First Class, South District Courts, New Delhi.

36-37. Nitesh Rane

Nitesh Rane, BJP MLA from Thane, Maharashtra, has been flagged by the Hate Speech Cell for strategic litigation due to the severity, recurrence, and public influence of his statements. At public gatherings, Rane propagated the “love jihad” conspiracy theory, demonized Muslims, and issued explicit violent threats, declaring that anyone engaging in “love jihad” would be left “unable to love again.” He further urged police to “crack down on jihadis,” mocked Muslims with statements such as “This is not your abba’s Pakistan,” and suggested demeaning acts like “breeding pigs” to intimidate the community. These remarks are part of a recurring pattern of incendiary rhetoric by a high-profile elected representative, demonstrating both the gravity of hate speech and the influence such statements wield in normalizing hostility and fear. Pursuing this case

also serves the broader strategic purpose of assessing whether law enforcement applies hate-speech laws consistently to influential political figures.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Siddharth Mishra & Adv. Sehrish Jafri

Status: Police complaints was filed at Hauz Khas Police Station by Advocate Siddharth Mishra on 04.12.2025. Reminders were sent thereafter. An application for registration of FIR under Section 175 (3) BNSS was drafted and is currently under filing, seeking appropriate directions.

38. Milind Ekbote

Milind Ekbote, a long-time far-right leader in Beed, Maharashtra, and president of Dharmaveer Sambhaji Maharaj Pratishthan and Samasta Hindu Aghadi, has repeatedly used public platforms to incite communal hostility and threaten minority communities. At a Jan Akrosh Morcha organized by Sakal Hindu Samaj, he, alongside Sangram Babu and BJP MLA Gopichand Padalkar, delivered speeches targeting Muslims and Christians, propagating conspiracies such as “love jihad” and “land jihad.” Ekbote explicitly threatened butchers with violence and death, using inflammatory language and asserting that Muslims chant “Har ghar me Afzal paida hoga,” a claim aimed at stoking fear and communal tension locally. These statements are not isolated incidents but part of a broader pattern of recurring, provocative, and dangerous rhetoric that leverages his organizational influence to legitimize hostility toward minorities. Given his history as a repeat offender, pursuing this case is strategically important to test whether accountability mechanisms hold for actors who consistently mobilize hatred.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Sehrish Jafri

Status: Malviya Nagar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Malviya Nagar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

39-40. Mahant Raju Das (Multiple Incidents)

Mahant Raju Das, priest of Ayodhya's Hanuman Garhi Temple, has been identified by the Hate Speech Cell for strategic litigation due to the extreme gravity, recurrence, and violent nature of his rhetoric. At various events, Das openly incited physical violence against those who oppose Sanatan Dharma, explicitly threatening to stab, mutilate, or gouge the eyes of dissenters. He further dehumanized Muslims, referring to them disparagingly, asserting that those who follow Mohammad's teachings constitute a separate organization called Islam, and propagated fear about demographic changes, claiming Muslim families have "three wives and seventy-three children" compared to Hindus. These statements reflect a sustained pattern of hate advocacy that leverages his religious authority to mobilize followers and normalize extreme intolerance, making the rhetoric particularly dangerous at the local level. Pursuing this case is critical to testing systemic response to the most virulent forms of communal hate speech.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Tamanna

Status: Police complaint was filed at Hauz Khas Police Station by Advocate Tamanna, reminders were duly sent. The matter is now placed before Judicial Magistrate First Class, South District Courts, New Delhi. The matter will now be taken up for consideration on 13.07.2026.

Another police complaint was filed at Vasant Vihar Police Station by Advocate Tamanna, reminders were duly sent to the Deputy commissioner of police. In light of continued inaction, the matter was placed before the Judicial Magistrate first class, Patiala Court, New Delhi. The Court has now called for an Action Taken Report (ATR) from the police, which will be taken up for consideration on 01.12.2026.

41-44. Yati Narsinghanand Giri (Multiple Incidents)

Yati Narsinghanand Giri, a far-right monk based in Ghaziabad, Uttar Pradesh, has been flagged by the Hate Speech Cell for strategic litigation due to the extreme severity, recurrence, and national reach of his incendiary rhetoric. In multiple public speeches, Giri has openly advocated violence against Muslims, describing Islam as an "Adharm," propagating fear of a demographic takeover, and predicting catastrophic outcomes for

Hindus, including mass killings, forced conversions, displacement, and sexual enslavement of women. He has urged Hindu women to bear ten children to counter a perceived threat from Muslims, while labeling Islam a “*cancer*” set on global domination. His statements not only dehumanize an entire community but also normalize threats of extreme violence, creating an environment of fear and potential mobilization toward physical harm. Given his influence as a nationally notorious hate-monger, pursuing this case is critical to testing the system’s response to the most dangerous forms of hate advocacy.

Complainant/Petitioner: Harsh Mander & Suroor Mander

HSC Lawyer: Adv. Chandni Sharma, Adv. Tamanna, Adv. Kartik Rajpurohit & Adv. Sehrish Jafri

Status: Police complaints were filed at Hauz Khas Police Station & Vasant Kunj Police Station by Advocates Tamanna, Kartik Rajpurohit & Sehrish Jafri on 15.11.2025, & 04.12.2025. Reminders were sent thereafter, seeking accountability and progress of the police complaints. However, in light of inaction, the matter was placed before the jurisdictional magistrate at Karkardooma Court under Section 175 (3) BNSS. Another application under Section 175(3) BNSS has been placed before the Patiala District Court at New Delhi seeking directions to the police to register an FIR against Yati Narsinghananda.

45. Dinesh Patil

Dinesh Patil is the National President of the Bharatiya Bajrang Dal and founder of the Akhil Aryavart Sangh- Antarashtriya Bajrang Dal, has emerged as one of the most belligerent and openly communal Hindutva figures in the country. At an event organised by the Akhil Aryavart Sangh- Anatarrashtriya Bajrang Dal, he invoked issues related to population growth and demographic change, directly targeting and stigmatising muslims. The rhetoric employed contributes to the normalisation of demographic fear-mongering and collective blame, which has the potential to incite discrimination and social exclusion. Strategically, pursuing this case is important, given the influential profile of the speaker and the recurrence of such narratives as a proxy for communal targeting.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Kartik Rajpurohit

Status: Police Complaint has been filed on 04.12.2025 by Adv. Kartik Rajpurohit at Hauz Khas Police Station. Reminders were sent to the Deputy Commissioner of Police. In light of continued inaction by the police, the matter was placed before the Jurisdiction Magistrate at Saket Court. The complaint will now be taken up by the court on 13.07.2026 for consideration.

46. Puneet Vashisht

Puneet Vashisht, identified as a leader of the VHP–Bajrang Dal, is accused of delivering an inflammatory and violent speech at a *Mahapanchayat* convened against the alleged religious conversion of a girl at a mosque. During this gathering, he invoked religious texts to assert that they mandate the killing of individuals accused of cow slaughter, thereby directly justifying lethal violence in the name of religion. He further alleged that Muslims have a singular objective: to capture property, target Hindu women, and increase their population, framing the entire community as a collective threat. In his speech, he described Muslims as “demons” identifiable by beards and caps, explicitly invoking religious imagery to argue that it is necessary to kill “demons”. Strategically, pursuing this case is vital because it involves direct threats, justifications for killing, and normalises both mob violence and brutality, making it a critical test case for addressing impunity.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Sehrish Jafri

Status: Police Complaint has been filed by Adv. Sehrish Jafri at Hauz Khas Police Station. Reminders were sent thereafter. Reminders were sent thereafter. An application for registration of FIR under Section 175 (3) BNSS was drafted and is currently under filing, seeking appropriate directions.

47. Gau Raksha Dal Speaker

This case arises from a Gau Raksha Dal Sammelan at which speakers delivered openly violent, eliminationist, and communal speeches targeting religious minorities and invoking calls for extreme violence. At the event, one speaker declared, “Until a few

are beheaded, this (cattle slaughter) will continue in the country,” explicitly advocating beheading as a means of enforcing cow protection and directly inciting lethal violence against those he claimed slaughter cattle and eat beef.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Sehrish Jafri

Status: The matter is under documentation and verification. The Hate Speech Cell is in the process of tracing the source of the video, verifying the authenticity of the recording, and identifying relevant details regarding the date, location and circumstances of the incident. Further legal action will be determined upon completion of the verification process.

48. Mohit Bajrangi

Mohit Bajrangi, a disciple of Yati Narsinghanand Saraswati at the Dasna Devi Temple, delivered a dangerous speech at a religious gathering, declaring that until “every mosque is bombed” and “every Quran and madrasa are burned” in India and worldwide, there is “no future for Bhagwat.” He stated that they are working under Yati Narsinghanand Saraswati and will not stop until this is achieved. He referred to Islam as a “disease,” “filth,” and a “cancer,” and described Muslims as “mentally deranged people” who gain power by killing “women and children.” He called Islam a “threat to humanity,” alleged that it “sells women in the market,” and claimed that India cannot develop as long as Islam exists.

HSC Lawyer: Adv Imran

Status: The Hate Speech Cell coordinated with the state team in Uttar Pradesh to document the incident and filed a complaint against Mohit Bajrangi in the appropriate jurisdiction, namely Noida, where the incident occurred.

49. Multiple Speakers

At a Virat Hindu Sammelan, several far-right speakers delivered speeches inciting hostility and violence against Muslims and Christians. Rhiddhima Sharma openly called for retaliatory violence, urging supporters to kill “100 of them” in response to one killing and promoting the “love jihad” narrative. Thakur Ram Singh accused Christians of forced conversions and justified violence, stating that if persuasion fails,

“weapons must be used.” Another speaker urged attendees to “silently deal with” Muslims who interact with Hindu women. Cow-vigilantes Daksh Chaudhary and Prakash Singh also spread anti-Muslim conspiracy theories and issued threats of violence, including calls for beheading those who allegedly target Hindu women or temples. Other speakers used dehumanising language for Muslims and rejected ideals of communal harmony, while Vijay Hindu called for enforced displays of Hindu nationalist loyalty. Khusbu Pandey glorified the 1989 Bhagalpur massacre of Muslims, used dehumanising rhetoric, and brandished a sword while urging attendees to arm themselves.

HSC Lawyer: Adv Imran

Status: The Hate Speech Cell coordinated with the state team in Uttar Pradesh to document the incident and filed a complaint against Mohit Bajrangi in the appropriate jurisdiction, namely Rae Bareilly, Uttar Pradesh, where the incident occurred.

50. Kishan Prajapat

VHP–Bajrang Dal National Coordinator Kishan Prajapat delivered an anti-Muslim and anti-Christian speech, referring to them as “Mlecchas.” He urged Hindus to “stop, warn, and attack” any “Mulla, Maulvi, Father, and Pastor” who allegedly harass them, alleging that they do not understand without being attacked. He peddled the conspiracy theory of “love jihad” and called for violence against “Mullas” who he alleged were indulging in it, urging women to “cut off their hands, gouge out their eyes,” and declaring that “they won’t get cut into 35 pieces; we will cut them into 70 pieces.”

Complainant: Harsh Mander

HSC Lawyer: Adv Gaurav

Status: The Hate Speech Cell coordinated with the state team in Uttar Pradesh to document the incident and filed a complaint against Mohit Bajrangi in the appropriate jurisdiction, where the incident occurred.

51. Mahant Raju Das

At a Virat Hindu Sammelan, Mahant Raju Das delivered an anti-Muslim speech, referring to Allah as “suar” (pig), branding JNU students as “vidharmi,” and calling for them to be “set on fire.” He promoted the anti-Muslim conspiracy theory of “love jihad,” claiming that 400 Hindu girls had been converted, and alleged that Hindu

children were being “cut into pieces” or forced to become “*topiwala*.” He vilified Muslims by invoking halala and khatna, urged Hindus to become *kattar* (radical), and fearmongered over alleged demographic change by warning that Hindus would be wiped out within six generations unless they became “stones against stone-pelters.”

HSC Lawyer: Adv Imran

Status: The Hate Speech Cell coordinated with the state team in Uttar Pradesh to document the incident and filed a complaint against Mahant Raju Das in the appropriate jurisdiction, namely Shikarpur, Uttar Pradesh, where the incident occurred.

52. Lalit Sharma

On 09.03.2026, Mr. Lalit Sharma – a member of the Hindu Raksha Dal – stated at a gathering held in Uttam Nagar that this time, they would not allow Muslims to celebrate Eid, even if it meant having to “play Holi with blood”. Sharma declared, “Neither will Eid be celebrated this time, nor will we allow prayers to be offered. Even if we have to play Holi with blood, we will certainly play Holi this Eid.” He added, “The Hindu Raksha Dal has entered the fray; this time, we will set their [the Muslims’] minds straight.” The developments follow an incident of violence between two families that took place on March 4 in JJ Colony, Uttam Nagar. The unfortunate killing of 26-year-old Tarun Kumar following an inter-family dispute on the occasion of Holi over a water balloon is being used as a communal trigger by people like Mr. Lalit Sharma to openly make calls for violence and hatred against the muslim community in the area.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv Sehrish Jafri

Status: A police complaint has been filed at the Uttam Nagar Police Station. In the absence of meaningful police action, reminders are being issued and the matter will be placed before the jurisdictional magistrate in due course.

53. Vishal Goyal

This case was selected for strategic litigation because it involved a prominent far-right social media influencer whose speeches and online content reach a substantial audience.

A New Year speech by Vishal Goyal featured abusive and cuss-laden language, including violent threats against those accused of targeting Hindu women, vows to stop cow slaughter and “land jihad,” and calls for the expulsion of groups he derogatorily labels as Babar’s descendants, ending with a call to establish a Hindu nation and slogans urging followers to strengthen Sanatan Dharma.

Complainant: Suroor Mander

HSC Lawyer: Adv Sehrish Jafri

Status: A police complaint was filed on 22 January 2026. Following the failure of the police authorities to initiate appropriate action, reminders were duly issued to the concerned officials. An application under Section 175(3) of the Bharatiya Nagarik Suraksha Sanhita, 2023 has been drafted and is presently under the filing process before the jurisdictional Magistrate seeking appropriate directions in accordance with law.

54. Sangeet Som

Sangeet Singh Som, a former Member of the Legislative Assembly and a prominent figure within Hindu nationalist circles, has long occupied a position of influence in communal and political discourse. Statements made by such individuals possess a far greater capacity to normalise prejudice and legitimise exclusionary narratives. In the speech under consideration, the speaker began by referring to the persecution of Hindus in Bangladesh, a subject of legitimate public concern. However, the speech then shifted from discussing alleged human rights violations to constructing a narrative of betrayal and disloyalty directed at specific individuals and, by implication, broader sections of the Muslim community. Actor Shah Rukh Khan was singled out and repeatedly described as a “traitor” and “anti-national”, with allegations that his professional associations amounted to support for countries hostile to India.

Complainant: Suroor Mander

HSC Lawyer: Adv Sehrish Jafri

Status: A police complaint has been filed at the Vasant Vihar Police Station. In the absence of meaningful police action, reminders are being issued and the matter will be placed before the jurisdictional magistrate in due course.

55. Rishabh Ojha

Rishabh Ojha is a far-right Hindutva influence, having a substantial following on social media. In his post, Rishabh Ojha called on Hindu organizations to carry out extreme vigilante violence against Muslims, repeatedly referring to them as “jihadis” and “terrorists,” and openly advocates murder, kidnapping, and torture as a source of “fun” and “satisfaction.” It glorifies revenge killings, promotes collective punishment, and claims such violence will continue until India becomes a “Hindu nation.” The speaker justifies violence by invoking alleged atrocities in Kashmir and West Bengal, threatens that killings “will not stop,” and encourages others to participate, framing mass violence and religious persecution as legitimate and pleasurable acts.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeshwar

Status: Malviya Nagar Police Station. The Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Malviya Nagar Police Station. In anticipation of inaction, reminders to the concerned authorities and an application under Section 175(3) BNSS are also being drafted and are in the process of being placed before the Judicial Magistrate First Class, South District Courts, New Delhi.

56. PC George

P.C. George is a senior political leader and former seven-term Member of the Legislative Assembly from Kerala whose statements carry influence beyond the immediate audience before which they are delivered. In his speech, The speaker claims that “love jihad” has caused the loss of over 400 children, portraying interfaith relationships as an organized Muslim conspiracy, with Meenachil Taluk allegedly targeted. He links Muslims to “love jihad,” “narcotic jihad,” drug trafficking, and explosives, and uses a 14-year-old girl’s suicide to stoke fear. Muslims are depicted as exploiting Christian girls, while Christian families are urged to marry daughters by 22 to prevent them from being “trapped.” He further calls for Hindu and Christian communities to unite against Muslims, presenting them as a collective threat to Kerala and India. The case also holds strategic importance because it represents one of the Hate Speech Cell’s interventions in Kerala.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeshwar

Status: The matter is presently under documentation and complaint preparation. The Hate Speech Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Malviya Nagar Police Station.

57. Raghvendra Pratap Singh

The case was pursued as an instance of dangerous hate speech involving both communal incitement and threats directed at a religious minority. Raghvendra Pratap Singh called for the forced conversion of Muslim girls to Hinduism, proposing a “10 for 2” demand, saying at least ten conversions are required in response to two girls who allegedly left, while encouraging marriages with promises of jobs and support amid religious slogans. The speech escalates into explicit threats, warning Muslims of a “heavy price” and issuing intimidating remarks to community religious leaders, framing the message as coercive and collective punishment.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeshwar

Status: The matter is presently under documentation and complaint preparation. The Hate Speech Cell is in the process of finalising the transcription and translation of the impugned speech. A detailed police complaint is being prepared for submission before Malviya Nagar Police Station.

II. Hate Speech Cases during elections

Delhi Election 2025

58. Nazia Elahi Khan

Harsh Mander vs. Nazia Elahi Khan, before Judicial Magistrate First Class, Rohini Court

Nazia Elahi Khan, a political spokesperson for the Bharatiya Janata Party, has been identified by the Hate Speech Cell for strategic litigation due to her repeated pattern of

incendiary statements targeting the Muslim community, particularly during the Delhi elections. On 05.01.2025, at an event organized by “Chetna” in Rohini, Delhi, Khan made highly provocative and derogatory remarks that vilified Muslims by linking the community to polygamy, temporary marriages, coercion, and violence. She urged Hindus, especially women, to be wary of relationships with Muslim men, citing Bollywood actor Shah Rukh Khan’s marriage to Gauri Khan to insinuate that Muslim men use interfaith relationships to dominate or convert Hindu women, while disparaging ordinary Muslim men as “street vendors, lemon sellers, or puncture repairmen.” The statements were deliberately framed to incite fear, spread enmity, and undermine communal harmony, disturbing societal peace. Khan has a documented history of similar remarks, including provocative speeches in Karnataka and Kolkata, for which FIRs were registered, demonstrating a recurring pattern rather than isolated incidents. Despite the repeated occurrence, she has neither apologized nor distanced herself from such rhetoric. As a public figure representing a political party, her statements carry significant influence, making strategic litigation critical to uphold the rule of law, ensure accountability, and prevent the normalization of hate speech.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Gaurav Kumar, Siddharth Mishra, Sehrish Jafri & Kartik Rajpurohit, Advs.

Status: A complaint was filed with the Rohini South Police Station, followed by reminders to the DCP, but no action has yet been taken; the matter is now ongoing before the Judicial Magistrate First Class under sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023. The next date for hearing is 02.12.2026.

59. Ramesh Bidhuri

Harsh Mander vs. Ramesh Bidhuri, before Judicial Magistrate First Class, Saket Court

Ramesh Bidhuri, a BJP politician and former Member of Parliament, has been identified by the Hate Speech Cell for strategic litigation due to his repeated use of public platforms to deliver inflammatory and derogatory remarks targeting the Muslim community, particularly during the Delhi elections. On 21.02.2025, at a campaign rally in Transit Camp, Govindpuri, Delhi, Bidhuri made statements mocking Muslims as

inherently polygamous, lawless, and antagonistic toward the Prime Minister, referencing the “*Triple Talaq*” law to deride their community practices and suggesting that Muslims were anxious about political developments. These remarks not only vilify a specific religious group but also portray them as disloyal citizens, promoting disharmony and hostility, and disrupting public tranquility. This incident forms part of a broader pattern of hate speech, exemplified by his earlier communal slurs on 21.09.2023 against MP Danish Ali, whom he referred to as a “*Mullah aatankwadi*,” “*ugravaadi*,” and “*katwa*,” demonstrating recurring targeted rhetoric. Strategic litigation in this case is critical to uphold the consistent application of hate speech laws to influential elected representatives, to prevent normalization of communal vilification, and to protect minority communities from fear, insecurity, and alienation.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Gaurav Kumar & Sehrish Jafri, Advs.

Status: Complaints have been filed with the Govindpuri Police Station and reminders sent to the DCP, South East District, but no action was taken; the matter was then placed before the Judicial Magistrate First Class under sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023. In its status report before the magistrate, the police stated that they had visited the site of the alleged incident but were unable to find evidence of the speech. Notably, a video recording of the speech had already been submitted to the police in CD format. However, the authorities stated that the original video had been taken down from its source on Facebook. On behalf of the Hate Speech Cell, Advocate Gaurav & Siddharth filed a detailed reply before the court highlighting the obligations of intermediaries under the Information Technology Act to preserve digital evidence. The reply also expressed dissatisfaction with the limited steps taken by the investigating authorities to secure and examine available evidence.

Following detailed arguments, the Magistrate directed the Investigating Officer to be present on the next date of hearing to provide a response and to account for the steps taken in the investigation. The next date of hearing is 08.08.2026.

60. Sanjay Nirupam

*Harsh Mander vs. Sanjay Nirupam & Anr., Judicial Magistrate First Class,
Saket Court*

Sanjay Nirupam, deputy leader and spokesperson of Shiv Sena, gave a highly provocative and communally charged statement on 04.04.2025 i.e. during Delhi elections at a press conference. He launched a scathing public attack on Muslims and Muslim political leaders, issuing statements that explicitly invoked the threat of mass violence by drawing a comparison to the Jallianwala Bagh massacre in response to protests by Muslims against CAA & Waqf amendment act. He stated, *“If you come out on the streets, jump into manholes or gutters — this law will not change. If you create a Shaheen Bagh, it can soon turn into a Jallianwala Bagh.”* The invocation of Jallianwala Bagh, a site of colonial-era mass killing, operates as a thinly veiled threat of state or mob violence against a specific religious community. Strategically, pursuing this case is crucial because it involves a senior political figure using historically loaded imagery to threaten a minority community for exercising democratic protest rights, tests the boundary between political speech and criminal intimidation, and addresses the dangerous normalisation of violence-coded language against Muslims in electoral and legislative discourse.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeeswar

Status: A complaint was filed on 16.04.2025 at the Hauz Khas Police Station on behalf of Mr. Harsh Mander. However, in light of continued inaction, the matter is now before the Judicial Magistrate First Class Saket under sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023. The next date of hearing is 13.07.2026.

61-64. Ravinder Singh Negi

Harsh Mander vs. Ravinder Singh Negi, before Judicial Magistrate First Class, Karkardooma Court

Paranjay Guha Thakurta vs. Ravinder Singh Negi, before Judicial Magistrate First Class, Karkardooma Court

Paranjay Guha Thakurta vs. Ravinder Singh Negi, before Judicial Magistrate First Class, Karkardooma Court

Ravinder Singh Negi, a Bharatiya Janata Party (BJP) leader, has been identified for strategic litigation due to his repeated delivery of provocative and communally charged

statements targeting Muslims during public election campaigns in Delhi. On 29.11.2024, at Patparganj, Delhi, Negi confronted street vendors, asking their names and immediately singling out those who were Muslim. He publicly accused Muslim vendors of adulterating food, engaging in dishonest practices, and occupying public spaces illegitimately, instructing them to display symbols of their Hindu identity to gain trust. His statements painted an entire religious community as dishonest and encroaching, inciting fear and potential hostility in a public space. This incident is part of a broader pattern of hate speech, including earlier statements on 12.03.2024 at Patparganj where he directed vendors to label themselves as Hindu, vilified other communities, and warned of supposed threats from them. These remarks clearly promote enmity, ill-will, and distrust between religious groups, and constitute offences under sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Gaurav Kumar, Siddharth Mishra, Sehrish Jafri & Kartik Rajpurohit, Advs.

Status: Despite complaints filed with the Mandawali Police Station and reminders sent to the DCP, East Delhi, no action has been initiated against Negi. The matter is now under filing to be placed before the Judicial Magistrate First Class (JMFC), Karkardooma.

65-66. Nishikant Dubey

Harsh Mander vs. Nishikant Dubey, before Judicial Magistrate First Class, Saket Court

Nishikant Dubey, a Bharatiya Janata Party leader, has repeatedly made provocative and communally charged statements targeting Muslims, particularly in the context of election-related discourse. On 20.04.2025, he responded to former Chief Election Commissioner SY Quraishi's post on social media platform X regarding the Waqf Amendment Act, stating that Quraishi was "not an Election Commissioner but a Muslim Commissioner" and linking the Muslim community to alleged voter manipulation and historical grievances. His statements also propagated narratives of demographic change, suggesting Muslim infiltration and portraying the community as a threat to national integrity. Dubey's statements constitute prima facie offences under

Sections 196 and 197 of the Bharatiya Nyaya Sanhita (BNS), 2023, as they incite enmity on the basis of religion, delegitimize dissent, and vilify a minority community. Complaints were filed with the Hauz Khas Police Station on 24.04.2025, and reminders were sent to the DCP, Hauz Khas, but no action has been taken.

These incidents are part of a broader pattern of hate speech by Dubey, including repeated allegations of demographic manipulation by Muslims in Jharkhand and other states between 2022–2024. Despite these occurrences, he has neither distanced himself from his remarks nor apologized.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Chandni Sharma and Samvedh Bagavadeeswar, Advs.

Status: Despite complaints filed with the Hauz khas Police Station and reminders sent to the DCP, no action has been initiated against Negi. The matter is now placed before the Judicial Magistrate First Class (JMFC), Saket.

67-68. Ashwini Kumar Upadhyay

Ashok Kumar Sharma vs. Ashwini Kumar Upadhyay, before Judicial Magistrate First Class, Karkardooma Court

Ashok Kumar Sharma vs. Ashwini Kumar Upadhyay, before Judicial Magistrate First Class, Saket Court

Ashwini Kumar Upadhyay, a public figure and lawyer, has repeatedly made provocative and communally charged statements targeting Muslims, particularly during election periods and public events. On 25.12.2024, during an event related to the Delhi Legislative Assembly elections, he claimed that “Hindus are extinct” in multiple districts and alleged a “drug jihad” affecting Hindu youth, deliberately framing the Muslim community as an existential threat. His statements also evoked historical displacements and painted minorities as a hostile force. Complaints were filed with the Mandawali Police Station on 29.04.2025, and reminders were sent to the DCP, East District, but no action has been taken. This pattern of hate speech is consistent with previous statements, including:

20.08.2021 – Arrested for organising anti-Muslim slogans at a protest in Delhi's Jantar Mantar.

26.05.2023 – Spread false claims about Muslim population growth and demographic threat to Hindus via TV debates, PILs, and public speeches.

The remarks made by Upadhyay on 25.12.2024 constitute prima facie offences under Sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023, as they promote enmity between religious groups, make imputations prejudicial to national integration, and pose a threat to public peace.

Complainant/Petitioner: Ashok Sharma

HSC Lawyer: Siddharth Mishra, Gaurav Kumar, Sehrish Jafri & Samvedh Bagavadeeswar, Advs.

Status: Despite complaints filed with the Mandawali Police Station as well as Vasant Vihar Police Station, and reminders sent to the DCP, no action has been initiated against him. The matter is now in the filing process, to be placed before the Judicial Magistrate First Class (JMFC), Karkardooma & Saket, emphasizing the need for judicial intervention to prevent the normalization of hate speech.

69-70. Himanta Biswa Sarma

Harsh Mander vs. Shri Himanta Biswa Sarma, before Judicial Magistrate First Class, Karkardooma Court

Harsh Mander vs. Shri Himanta Biswa Sarma, before Judicial Magistrate First Class, Karkardooma Court

Himanta Biswa Sarma, Chief Minister of Assam and a senior Bharatiya Janata Party leader, has repeatedly made provocative and communally charged statements targeting the Muslim community, including during the 02.02.2025 election rally at Babarpur, Delhi, where he falsely portrayed Muslims as undeserving beneficiaries of public resources and contrasted this with state support for Hindu priests, while vilifying religious education in madrasas. His remarks, invoking historical and demographic narratives, were delivered in a public forum with the potential to incite fear, hatred, and communal tension. Despite complaints filed with the Bhajanpura Police Station on

29.04.2025 and reminders sent to the DCP, North-East District, no action has been taken. These statements constitute prima facie offences under Sections 196, 197, 198, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023. This incident forms part of a broader pattern of hate speech by Sarma, including repeated statements on “*mini Bangladesh*,” “*land jihad*,” and “*love jihad*,” and despite these occurrences, he has neither distanced himself from the remarks nor apologized.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Gaurav Kumar

Status: Despite complaints filed with the Bhajanpura Police Station, and reminders sent to the DCP, no action has been initiated against him. The matter was placed before the Judicial Magistrate First Class (JMFC), Karkardooma. The court directed the complainant to withdraw the said application and directed the complainant to approach the MP/MLA court.

71. Jagjit Singh Goldy

Joe Thomas Athialy vs. Jagjit Singh Goldy, Judicial Magistrate First Class, Rohini Court

Jagjit Singh Goldy, a political figure campaigning in the 2025 Delhi Assembly elections, made highly provocative and communally charged statements during an election rally at Shakurpur constituency on 01.02.2025, targeting the Muslim community through repeated references to “*tukde-tukde gang*,” “*thook jihad*,” and alleged land encroachments. His speech, which praised Bajrang Dal activists for protecting Hindus while vilifying Muslims, framed a specific religious group as a threat to public order and national unity.

Complainant/Petitioner: Joe Thomas Athialy

HSC Lawyer: Siddharth Mishra, Gaurav Kumar, Sehrish Jafri & Kartik Rajpurohit, Adv.

Status: Complaints were filed with the Subhash Place Police Station on 29.05.2025, and reminders were sent to the DCP, Guru Harkrishan Marg, but no action has been taken. These statements constitute prima facie offences under Sections 196, 197, and

198 of the Bharatiya Nyaya Sanhita (BNS), 2023, as they deliberately incite enmity on the basis of religion and undermine communal harmony. The matter is now under filing process and will be placed before the Judicial Magistrate First Class (JMFC).

72-74. Pushkar Singh Dhami

Vijayan Mallothra Joseph vs. Pushkar Singh Dhami, before Judicial Magistrate First Class, Saket Court

Vijayan Mallothra Joseph vs. Pushkar Singh Dhami, before Judicial Magistrate First Class, Saket Court

Pushkar Singh Dhami, Chief Minister of Uttarakhand and a senior Bharatiya Janata Party leader, made highly provocative and communally charged statements during multiple election rallies in Delhi on 01.02.2025 and 02.02.2025, targeting the Muslim community through references to “land jihad,” alleged food adulteration, and encroachments by minority communities. His speeches, including those at RK Puram and other constituencies, contrasted the so-called protection of Hindu interests with vilification of Muslims, framing them as a threat to social order and the “original form of Devbhoomi.” Complaints were filed with the Hauz Khas Police Station on 24.04.2025, and reminders were sent to the DCP, South Delhi District, but no action has been taken. These statements constitute prima facie offences under Sections 196, 197, and 299 of the Bharatiya Nyaya Sanhita (BNS), 2023, as they are designed to incite enmity on the basis of religion and pose a clear and present danger to public tranquillity.

Complainant/Petitioner: Vijayan Mallothra Joseph

HSC Lawyer: Siddharth Mishra, Gaurav Kumar, Sehrish Jafri & Samvedh Bagavadeeswar, Advs.

Status: Despite complaints filed with the Hauz khas Police Station and reminders sent to the DCP, no action has been initiated against Negi. The matter is now under filing process and will be placed before the Judicial Magistrate First Class (JMFC), Saket in due course.

75-76. Narayan Dutta Sharma

*John Dayal vs. Narayan Dutta Sharma, before Judicial Magistrate First Class,
Karkardooma Court*

Narayan Dutta Sharma, a political figure campaigning during the 2025 Delhi Assembly elections, delivered highly provocative and communally charged statements at a religious gathering in Sarita Vihar on 25.01.2025, directly targeting the Muslim community. His rhetoric framed the demolition of the Babri Masjid and construction of the Ram Mandir as a symbolic victory for Hindus, suggesting that only Hindus who support this ideology are deserving of political representation. He urged voters to support the lotus symbol based on religious identity, portraying non-supporters as unfaithful or disloyal, while repeatedly invoking religious sentiments to delegitimize opposition candidates.

Complainant/Petitioner: John Dayal

HSC Lawyer: Siddharth Mishra, Gaurav Kumar, Sehrish Jafri & Samvedh Bagavadeeswar, Advs.

Status: Complaints were filed with the Mandawali Police Station on 25.04.2025, and reminders were sent to the DCP, East Delhi, but no action has been taken. These statements constitute prima facie offences under Sections 196 and 197 of the Bharatiya Nyaya Sanhita (BNS), 2023, as they deliberately incite enmity on the basis of religion, undermine secularism, and threaten communal harmony. The matter is now placed before the Judicial Magistrate First Class (JMFC), pending consideration.

77-78. VHP-Bajrang Dal

*Harsh Mander vs. VHP/Bajrang Dal, before Judicial Magistrate First Class,
Tis Hazari*

In this case, legal action was initiated to challenge a highly provocative and militarised public rally organised by the Vishwa Hindu Parishad (VHP) and Bajrang Dal in the Paschim Vihar constituency of Delhi on 19 January 2025, at a time when the city was approaching the Delhi Assembly elections. The rally, described as a *Shashtra Deeksha* ceremony, involved participants publicly taking an oath to accept India as a “Hindu Rashtra” and to dedicate their body, mind, and wealth to the objectives of the Bajrang

Dal, including the wielding of weapons. Video evidence showed attendees holding weapons while reciting a pledge that framed India as an exclusively Hindu nation and called for its defence against alleged “internal and external threats.” The oath explicitly stated: *“From today, I accept with purity of thought, word and speech that India is a Hindu nation and protecting it from internal and external threats is the first objective of my life... I will do the work of Bajrang Dal with honesty, selflessness and with all my body, mind and wealth.”*

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Gaurav Kumar

Status: Recognising the grave implications of this speech for communal harmony, constitutional values, and public safety, particularly in an election period, a police complaint on behalf of Mr. Harsh Mander was first submitted on 02.05.2025 to the Station House Officer, Police Station Paschim Vihar. When no action was taken, a formal reminder dated 13.05.2025 was sent to the Deputy Commissioner of Police, Paschim Vihar. Faced with this continued inaction, the complainant pursued judicial intervention by filing an application under Section 175(3) of the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023 before Judicial Magistrate First Class, Tis Hazari, seeking directions from the court to compel the police to perform their statutory duty. An Action Taken Report (ATR) has been called from the police by the court.

Alongside the cases directly pursued by the Hate Speech Cell, a number of complaints arising from the 2025 Delhi Legislative Assembly elections were filed with the support of independent volunteers who were willing to pursue the matter before the courts.

79-81. Yogi Adityanath

Three complaints were filed before Karol Bagh Police Station, Mangolpuri Police Station and Rajendra Nagar Police Station in relation to inflammatory speeches delivered by Yogi Adityanath on 23.01.2025 and 28.01.2025 during the Delhi Legislative Assembly election campaign. Reminders were duly issued by the Hate Speech Cell. However, no substantive police action followed. The matters were subsequently handed over to the respective volunteer complainants for further intervention.

Complainant/Petitioner: Gautam Mody, Jagdeep Chokhar

82. Kapil Khanna

A complaint was filed in relation to an inflammatory speech delivered by Kapil Khanna, President of the Vishwa Hindu Parishad, on 15.12.2024. The speech invoked long-standing communal mobilisation around the disputed religious sites at Mathura and Kashi and sought to revive narratives that have historically contributed to communal polarisation. The matter was subsequently handed over to the volunteer complainant to pursue further legal remedies.

Complainant/Petitioner: Gita Kriplani

83. Kanhaiya Mittal

This case was selected for strategic litigation because it involved the use of overtly communal rhetoric during an election campaign by a highly influential public figure with significant reach among Hindu nationalist audiences. The speaker asserted that Muslims vote collectively and urged Hindus to respond by similarly uniting as a religious voting bloc. By framing electoral choices through the lens of religious identity, the speech sought to transform a political contest into a communal one. A complaint was filed at the Vinod Nagar Police Station by the volunteers. The case was thereafter handed over to the respective complainant to seek further intervention.

Complainant/Petitioner: Venugopal

84. Anurag Singh Thakur

This case involved a senior national political leader using an election platform to disseminate rhetoric that portrayed an already vulnerable refugee community as a threat to the rights, resources and welfare of local residents. During the Delhi Legislative Assembly election campaign, Anurag Singh Thakur repeatedly referred to Rohingya Muslims and alleged Bangladeshi migrants as beneficiaries of resources that rightfully belonged to Indian citizens.

Complainant/Petitioner: Navrekha Sharma

Bihar Election 2026

85. Bhagwati Shukla

Bhagwati Shukla, the National President of the Rashtriya Sanatan Sena, leads an organization widely known for its work and rhetoric specifically directed against the Muslim community. According to reports from Karwan volunteers, Mr. Bhagwati Shukla has a history of speaking with offensive language about both Dalits and Muslims. However, because of the heated political climate in Bihar he has focused heavily on the Muslim population. He is actively encouraging and influencing Hindu youth by using inflammatory and harmful accusations against Muslims, such as calling them "beef eaters" and spreading the polarizing idea of "love jihadi." This case was pursued with particular urgency because the impugned statements and narratives were disseminated through social media platforms during a politically sensitive period leading up to the Bihar elections.

Complainant/Petitioner: Suroor Mander

HSC Lawyer: Adv. Samvedh Bagavadeeswar

Status: Vasant Vihar Police Station. Complaint filed on 15.11.2025; reminders were issued and the matter is now placed before the jurisdictional magistrate at the Patiala District Court.

86. Giriraj Singh

This case was pursued strategically because the impugned statements were made by a sitting Union Minister and Member of Parliament during an active election campaign in Bihar, a context in which political speech carries exceptional influence and heightened consequences. At a poll rally in Arwal, Bihar, Singh suggested that citizens who accept government welfare schemes, implicitly referencing Muslim beneficiaries of Prime Minister Narendra Modi's programs, have a moral obligation to vote for the ruling party. While the remarks did not involve explicit calls for physical violence, they constituted politically charged, exclusionary rhetoric that reinforces social divisions and pressures a vulnerable community to conform politically under threat of marginalization. This case is strategically important not only because of the recurring pattern of communalized messaging by a high-profile elected representative but also to

assess whether law enforcement applies hate-speech laws consistently to influential politicians.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeeswar

Status: A police complaint has been filed at Hauz Khas Police Station by Advocate Sehrish Jafri on 15.11.2025, with reminders sent to the Deputy Commissioner of Police in light of inaction. The matter is now placed before the jurisdictional Magistrate at Saket Court, New Delhi. The matter has been kept for consideration for the next date of hearing i.e. 13.07.2026.

87. BJP4INDIA (BJP4India is the official social media handle of the Bharatiya Janata Party)

This case was pursued strategically because the impugned content originated from the official social media handles of a major national political party during the Delhi election period, giving the messaging an institutional character and wide reach. In December 2025, multiple posts circulated from the BJP4India accounts reinforced Islamophobic and exclusionary narratives through coded language, derogatory references to Muslim-majority localities, and visual framing that portrayed religious minorities, particularly Muslims, as threats to public order and national cohesion. Such content aligns with a broader documented pattern in which party-affiliated digital platforms amplify polarising rhetoric, target dissenters such as journalists and protesters, and promote a Hindu nationalist worldview. This case addresses the use of official political party social media platforms to circulate exclusionary and Islamophobic narratives during an election period

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv Sehrish Jafri

Status: A police complaint was filed on 23 January 2026. Following the failure of the police authorities to initiate appropriate action, reminders were duly issued to the concerned officials. An application under Section 175(3) of the Bharatiya Nagarik Suraksha Sanhita, 2023 has been drafted and is presently under the filing process

before the jurisdictional Magistrate seeking appropriate directions in accordance with law.

88. Ashok Singhal

On 14.11.2025, Ashok Singhal, Assam's Minister of Health & Family Welfare and Irrigation, posted a celebratory message on X referencing "Gobi farming" alongside an image of a cauliflower field to mark the NDA's electoral success in Bihar. The post was widely criticised for invoking a disturbing historical association with the 1989 Bhagalpur massacre, during which large numbers of Muslims were killed, as cauliflower imagery has since been used as a dog whistle linked to that violence. Coming from a sitting cabinet minister, the post was perceived as trivialising past communal violence and signalling hostility towards the Muslim community, thereby contributing to a climate of fear, historical erasure, and communal polarisation. For communities in Bihar, especially Muslims, the symbolism used in the post was not abstract or distant history but a lived memory tied to mass violence, displacement, and long-standing impunity.

Complainant/Petitioner: Harsh Mander

HSC Lawyer: Adv. Sehrish Jafri

Status: Formal complaint has been filed with the Hauz Khas Police Station on behalf of Mr. Harsh Mander in relation to the aforesaid incident. Reminders were sent to the concerned senior police authorities, and in the event of continued inaction, the matter will now be placed before the competent court for appropriate directions and relief.

West Bengal Election 2026

89. Suvendhu Adhikari

Suvendu Adhikari, then Leader of the Opposition in West Bengal and a prominent political figure, stated that residents would first have to separate themselves from what he described as “Jihadi Fundamentalists” before roads and development could be built. He further called for the display of Hindu religious symbols across the village, advocated the use of loudspeakers at temples, and made statements suggesting that Muslims must convert to Hinduism.

Complainant: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeeswar

Status: A police complaint was filed before Malviya Nagar Police Station. Reminders are presently being issued to the concerned authorities and the matter remains under active follow-up.

Assam Election 2026

90. Himanta Biswa Sarma

The complaint arose from a speech delivered by Sarma on 27 January 2026 in Digboi, Assam, in which he repeatedly referred to Bengali-speaking Muslims as “Miyas,” openly stated that BJP workers had been instructed to file complaints against them, encouraged the filing of large numbers of voter-roll objections, and urged supporters to “trouble” members of the community so that they would leave Assam. The speech further linked the targeted community to conspiracy narratives such as “love jihad” and portrayed them as outsiders whose continued presence should be resisted. On 20 April 2026, the Magistrate dismissed the application at the first hearing, holding that no offence was disclosed within the territorial jurisdiction of the court. The Hate Speech Cell subsequently challenged this order by filing a criminal revision petition before the District & Sessions Court.

On 26 May 2026, the Court of the Additional Sessions Judge, Saket Courts, issued notice to Assam Chief Minister Himanta Biswa Sarma and the Delhi Police on the revision petition and called for their response. The court took note of the submissions concerning Zero FIR and the territorial jurisdiction of courts in cases involving

electronic dissemination of hate speech. The matter has been listed on 15.07.2026 for further hearing and remains pending before the Sessions Court.

Complainant: Harsh Mander

HSC Lawyer: Adv. Samvedh Bagavadeeswar

Alongside the cases already initiated during elections, documentation is currently underway in relation to 18 incidents arising from the Assam elections, while 51 instances of potentially unlawful hate speech delivered during the West Bengal elections are presently being documented, translated, and assessed for possible legal intervention. In addition to criminal complaints, the Hate Speech Cell is exploring the use of election law remedies in appropriate cases. As a pilot intervention, the Cell aims to initiate at least one election petition during each major election cycle where evidence indicates that candidates or campaigners have engaged in speech that may amount to corrupt electoral practice or otherwise violate the legal framework governing elections.

CHALLENGES AND BARRIERS IN PURSUING STRATEGIC LITIGATION

Many of the challenges encountered by the Hate Speech Cell are not unique to hate speech litigation. They highlight deeper structural weaknesses within systems of policing and criminal justice in India that have long been identified in debates on police reform, access to justice and institutional accountability. Delays in complaint registration, opaque procedures, excessive discretion, weak supervision and judicial backlogs are problems that affect many across the country.

At the same time, the nature of hate speech as an offence introduces additional layers of complexity. Unlike many conventional crimes, hate speech often requires interpretation of language, context, intent, audience, social impact and political circumstances. Decisions regarding whether a particular speech crosses the threshold from protected expression to unlawful incitement are often contested and inherently prone to subjective judgment. The experience of the Hate Speech Cell demonstrates how existing structural deficiencies in the criminal justice system intersect with the distinctive challenges of documenting, prosecuting and securing accountability for hate speech.

- *Challenges in finding Petitioners/Complainants*

One of the first challenges arises even before any legal proceedings begin: finding complainants. In most cases, very few people were willing to become petitioners in hate speech cases. Many feared political retaliation, prolonged litigation, harassment, and did not want to expose themselves and their families to such risks. The Hate Speech Cell consistently tried to identify local complainants during its field visits and encouraged individuals to pursue these cases themselves, but this has often proved difficult. As a result, all the complaints had to be filed by members of the Hate Speech Cell, Suroor Mander and Harsh Mander.

- *Challenges at the Documentation Stage*

Much of the hate speech documented by the Cell is disseminated through social media platforms. Yet these same platforms, which often enable the rapid circulation of inflammatory content, also become the primary custodians of evidence. Videos are frequently deleted, removed, altered or rendered inaccessible within a short period of time. This creates a narrow window within which evidence must be identified, verified, downloaded and securely preserved. The responsibility for safeguarding this material often falls not upon investigative authorities but upon civil society actors seeking accountability.

- *Transcription and Translation*

Speeches are often made in regional languages, local dialects, or a fluid combination of multiple languages. Their meaning frequently depends not only on the words used but also on tone, context, cultural references and coded expressions that may not be readily apparent to an outsider. Existing technologies & LLMs remain unreliable for legal purposes for many Indian languages. Automated systems frequently struggle with poor-quality recordings, dialect variations, colloquial words, and context-specific expressions. A single mistranscribed phrase can alter the meaning of a statement and affect its legal interpretation. For this reason, every recording requires painstaking manual review by members of the team. Much of this labour remains invisible, yet it forms the foundation upon which every subsequent legal intervention rests.

- *Police Inaction and Administrative Barriers*

This challenge of tracking complaints has been repeatedly encountered in the course of our work. In many instances, complaints submitted to police stations receive no acknowledgement. Complainants are not informed whether the complaint has been received, entered into official records or acted upon. Ideally, every complaint should generate a unique registration number and a clear mechanism through which the complainant can monitor progress. In practice, this often does not occur. The resulting information gap leaves complainants in a state of uncertainty. Even where complaint numbers are assigned, existing digital platforms frequently fail to provide meaningful updates. Volunteers attempting to follow up on complaints telephonically from the police often encounter dismissive or hostile responses. At times, complaints have been returned without explanation and required to be resubmitted, creating further delay.

- *Preliminary Enquiries and the Problem of Discretion*

The introduction of preliminary enquiries under the Bharatiya Nagarik Suraksha Sanhita (BNSS) has added another layer of complexity. The BNSS now permits police authorities to conduct a preliminary assessment before deciding whether to register a First Information Report in cases where the punishment is of 3 years or more but less than seven years. Our Hate Speech cases fall within this category of crime. Such discretion becomes particularly problematic in hate speech cases. Determining whether speech crosses the line into unlawful incitement can be subjective. In effect, investigating officers are often required to make complex judgments about constitutional values, communal relations and the limits of

permissible expression. Where politically influential individuals are involved, the risk of selective application becomes even more pronounced.

Although the BNSS prescribes a strict fourteen-day timeline for conducting such enquiries, this requirement is rarely adhered to in practice. In several cases pursued by the Hate Speech Cell, complaints filed in January remained under enquiry until June or beyond. These prolonged and opaque enquiries effectively delay accountability while providing little opportunity for complainants to challenge procedural non-compliance.

- *Delays in Escalation & Supervisory*

Complaints and reminders addressed to senior officials often go unanswered despite repeated follow-up. The introduction of preliminary enquiries has further extended timelines because escalation can generally occur only after the police have been afforded an opportunity to complete the enquiry process. Representations submitted to senior officials often go unanswered despite repeated follow-up, even where there exists a documented record of repeated inaction by subordinate officers.

- *Filing Process*

Strategic litigation against hate speech is inherently resource-intensive. Cases frequently arise across multiple districts and jurisdictions, requiring extensive travel and coordination. Beyond legal drafting and court appearances, substantial effort is required simply to navigate filing procedures, comply with the local court's requirements and ensure that matters are properly listed before judicial officers. The logistical demands to move a case through the filing stage are intensive and require repeated follow-ups and visits to the courts across districts and jurisdictions.

- *Judicial Response and Structural Limitation*

Hate speech litigation also exposes a structural limitation within the criminal justice system itself. Criminal law in India is designed around the State as the principal actor. The police investigate, the prosecution conducts the case and the judiciary adjudicates. The role of the complainant or the victim is necessarily limited. When investigating agencies demonstrate reluctance to act, citizens possess few avenues through which they can enforce accountability. In such circumstances, meaningful intervention often depends upon the willingness of individual judges.

Once proceedings commence before the judge, courts commonly seek Action Taken Reports from the concerned police station before considering the substance or merits of the complaint. Existing backlogs at the courts mean that the first hearing may be scheduled several months after filing. In some cases, the interval between the original complaint and the first meaningful judicial consideration extends beyond half a year. The consequences of such delays are particularly severe in hate speech cases. Hate speech often derives its power from immediacy, its capacity to mobilise hostility and legitimise violence in the present. When legal responses are delayed by months or years, the harmful effects of the speech already disperse through society, diminishing the immediate value of an intervention.

IMPACT AND OUTCOMES - PATTERNS EMERGING FROM STRATEGIC LITIGATION

The impact of Strategic Litigation cannot be assessed solely through FIRs or convictions. The Hate Speech Cell was conceived not only as a mechanism for pursuing individual cases but also as an intervention designed to test institutions, generate knowledge and strengthen jurisprudence around hate speech. Viewed through this lens, the initiative has led to the following outcomes:

- *Documentation Outcomes*
 - The Hate Speech Cell has been able to create a robust internal knowledge base for hate speech litigation. The team has developed a detailed understanding of the evidentiary, procedural and legal requirements necessary to initiate and pursue complaints. The documentation process has helped in identifying bottlenecks and implementing solutions to improve the design and structure to pursue hate speech litigation in a systematic manner. A replicable template of how this design can be pursued across states and across jurisdictions in India can now be shared and help the team in training volunteers as well as common citizens who are willing to pursue complaints against hate speech. The archive of the Hate Speech cell can also serve as an important resource and repository for future interventions.
- *Legal & Institutional Outcomes*
 - The project has generated important insights into how different institutions respond to hate speech complaints and how emerging jurisprudence is taking shape across courts.
 - Although the project has encountered significant resistance and delay, it has nevertheless succeeded in securing critical forms of institutional engagement. Through the complaints filed by the Hate Speech Cell, police authorities were compelled to examine multiple incidents of hate speech that would have escaped legal scrutiny altogether. For perhaps the first time in many of these jurisdictions, police officials were required to examine detailed complaints alleging hate speech through the lens of constitution, criminal law, Supreme Court precedents and international standards. This process itself contributed to building institutional awareness regarding the legal framework governing hate speech.

- During the reporting period, one First Information Report (FIR) was registered and preliminary enquiries were initiated in seventeen cases. While many of these proceedings remain ongoing, their initiation itself represents an important outcome in a context where complaints relating to hate speech are frequently ignored or dismissed at the threshold stage.
- The experience before the judiciary has been uneven, but equally important. Some judges demonstrated an awareness of the growing challenge posed by hate speech and appeared receptive to legal interventions seeking accountability against it.
- In certain instances, judges were already familiar with the hateful conduct of particular individuals accused of delivering hate speech and engaged seriously with the complaints placed before them.
- Some courts displayed a willingness to engage with evolving hate speech jurisprudence. The Hate Speech Cell submitted compilations of relevant constitutional and criminal law judgements to assist the courts in navigating an area of law that remains relatively underdeveloped.
- At the same time, some complaints were dismissed without meaningful engagement with the merits of the complaints. Courts also differed in their understanding of territorial jurisdiction for hate speech incidents. Certain judicial officers directed matters involving elected representatives to special MP/MLA courts, while others entertained the complaints themselves. Some courts accepted jurisdiction where the complainant resided, while others recognised that digital dissemination of hate speech creates jurisdiction wherever the offending content is accessible. These differing approaches reflect an area of law that remains unsettled and continues to evolve.
- In some proceedings, courts sought to examine the bona fides of the complainant rather than the substance of the allegations themselves. Questions were raised regarding the complainant's motives, political views or organisational affiliations.
- In this sense, the litigation has contributed to identifying and testing unresolved legal issues that will shape the future trajectory of hate speech enforcement in India.

- *Community & Public Awareness Outcomes*

- Beyond the courtroom, the project has helped sustain public attention on the challenge of hate speech and the question of institutional accountability. One of the major interventions of the Hate Speech Cell during the reporting period was the [complaint filed by Harsh Mander against Assam Chief Minister Himanta Biswa Sarma](#). The complaint was based on speeches delivered by Sarma in Assam during January 2026. In one of the speeches at Digboi, he allegedly said that four to five lakh "Miya" voters would be removed from the electoral rolls during the Special Intensive Revision (SIR). In another speech, he reportedly encouraged people to "trouble Miyas". The complaint argued that these remarks specifically targeted Bengali-speaking Muslims in Assam, promoted hostility against the community, and had the potential to increase discrimination and social tensions. The complaint attracted wide public attention and became one of the most discussed hate speech cases of the year. It was reported by national newspapers, regional media, digital news platforms, and several independent YouTube channels. The case also generated public discussion on the responsibility of constitutional authorities and the limits of political speech, particularly when statements are directed at a vulnerable minority community. During the proceedings, the Delhi court issued notice while hearing the plea seeking registration of an FIR against Himanta Biswa Sarma.
- The filing of the complaint also encouraged wider public participation. Following Harsh Mander's intervention, several concerned citizens came forward to file similar complaints and publicly question the speeches. The case demonstrated how a legal intervention by one individual can encourage others to use constitutional and legal processes to challenge hate speech.
- [Himanta Biswa Sarma strongly reacted to the complaint and publicly stated that he would file "100 FIRs" against Harsh Mander](#). He also accused Mander of interfering in the NRC process in Assam and claimed that he had enough material to initiate multiple legal cases against him. These statements received significant media attention and further increased public discussion around the complaint. The case remained under legal follow-up throughout the reporting period and became one of the most prominent interventions undertaken by the Hate Speech Cell. It received sustained media attention, encouraged wider

public engagement, and highlighted the growing importance of using legal remedies to challenge hate speech by senior public officials.

- The issuance of notice in the revision petition to the Assam Chief Minister Shri Himanta Biswa Sarma by the Saket Court generated significant media coverage. Similarly, proceedings before the Supreme Court by a group of twelve activists, including Mr. Harsh Mander, seeking stronger regulation of hate speech by constitutional authorities, also highlighted the issue within national public discourse. Such coverage of the litigation helped in ensuring that the questions of accountability does not get lost within public discourse.
- *Action Research Outcomes*
 - Perhaps the most enduring contribution of the project lies in its role as a form of action research. Each case has generated insights into how laws governing hate speech operate in practice. The cumulative body of complaints, court filings, judicial orders and institutional responses generated through this initiative constitutes a significant contribution to the emerging jurisprudence on hate speech in India. These interventions help expand the body of knowledge available to future litigants, researchers, judges and policymakers.

Strategic litigation has therefore functioned as much more than a legal exercise. It has been a process of witnessing, documenting and resisting the normalisation of hate in public life. Even where legal remedies remain elusive, these interventions ensure that acts of hatred do not pass uncontested and that institutional failures do not remain invisible. The experience of the Hate Speech Cell demonstrates that the greatest challenge is often not the absence of law, but the reluctance of institutions to apply it with consistency.

POPULAR LEGAL EDUCATION FOR LEGALLY CHALLENGING HATE SPEECH

One of the central objectives behind establishing the Hate Speech Cell has been to democratise legal knowledge and make the law accessible to ordinary citizens seeking to challenge hate speech. While strategic litigation remains an important aspect of our work, long-term accountability requires broader public understanding of the legal tools available to respond to hate speech. Many individuals and communities directly affected by hateful and discriminatory speech are often unfamiliar with the relevant legal provisions, procedural requirements, or institutional mechanisms available to them. The result is that even where legal remedies exist, they frequently remain inaccessible in practice.

To address this gap, the Hate Speech Cell has been developing an interactive legal education resource titled the Citizens' Toolkit Against Hate Speech. The objective of this project is to translate complex legal frameworks into practical, accessible guidance that can be used by activists, students, journalists, lawyers, community organisations, and concerned citizens.

The Toolkit has been designed through a two-stage methodology. First, it seeks to provide a clear understanding of the substantive law governing hate speech in India. Secondly, it maps the procedural pathways through which these legal protections can be activated in practice. The substantive section draws upon extensive legal research undertaken by the Hate Speech Cell and situates Indian law within both constitutional and international human rights frameworks. It explains the legal provisions relating to hate speech under the Bharatiya Nyaya Sanhita, the Representation of the People Act, the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, the Information Technology Act, and relevant electoral regulations. It also summarises key judicial decisions that have shaped the interpretation of hate speech laws.

The procedural section is designed as a practical guide for action. It provides step-by-step guidance on documenting incidents, preserving evidence, filing complaints before police authorities, approaching the Election Commission during election periods, escalating cases where authorities fail to act, and navigating court procedures. Importantly, this section is informed not only by legal doctrine but also by the Hate Speech Cell's own experience pursuing complaints and strategic litigation across multiple states. The objective is not to present an idealised account of the law, but rather a realistic guide that reflects the obstacles frequently encountered in practice.

This section translates legal principles into step-by-step processes, explaining:

- How to identify relevant legal provisions based on the nature of the hate speech;
- How and where to file complaints (police stations, Election Commission, courts);
- What documentation and evidence are required;
- How to draft complaints to avoid misinterpretation or dilution by authorities; and
- What escalation mechanisms are available when institutions fail to act.

During this reporting period, the Citizens' Toolkit Against Hate Speech underwent substantial development and revision. The project progressed from the initial stage of finalising its structure and outline to extensive legal research, drafting, and compilation of the manual. Alongside the substantive legal sections, continuous updates were made to the procedural components of the manual based on lessons emerging from the Hate Speech Cell's ongoing litigation and complaint work.

One major addition concerns the requirement of government sanction before prosecution under hate speech provisions of the Bharatiya Nyaya Sanhita. Our experience has shown that the sanction requirement often functions as a significant barrier to accountability, particularly in politically sensitive cases. The revised manual now explains how the sanction process operates, how delays and refusals affect prosecutions, and what limited legal remedies remain available when sanction is withheld.

A second major area of development has been the inclusion of dedicated material on caste-based hate speech. One important gap in our work so far is how hate speech should be understood and defined when seen through the lived experiences of Dalit communities and other marginalised groups such as women, Christians, persons with disabilities, and others. Most legal definitions treat hate speech in abstract terms and do not adequately reflect histories of caste oppression, gendered violence, religious discrimination, or social exclusion. As a result, the real harm caused by everyday-slurs is often neutralised. Addressing this gap is necessary to ensure that our legal analysis, documentation, and responses to hate speech are rooted in social reality and speak directly to the experiences of those most affected.

Caste Hate Speech: Normalisation of anti-Dalit language

Discussion on hate speech in India often focuses on religion, communal violence and religious polarization. These are important concerns that frequently overshadow another deeply rooted form of hate speech that affects millions of people every day i.e. caste based hate speech. Unlike many other forms of hate speech, anti Dalit language is often so normalised that it is

rarely recognised as hate speech. It exists in everyday conversations, jokes, insults, political speeches, social media comments, workplaces, schools, colleges, public institutions, etc. Because it has been present for generations, many people no longer see it as a form of violence. For many Dalits, caste hate speech is not an occasional experience. It is woven into everyday life. Casteist slurs, derogatory references, and humiliating remarks continue to be used openly in many parts of the country. Such language is often dismissed as humour, local culture, political banter, or ordinary speech. In reality, these words carry a long history of exclusion, humiliation, and violence. They reinforce the idea that some people are naturally superior while others are expected to remain in low positions. The harm is not only emotional, it constantly reminds Dalits of the social hierarchy that caste seeks to maintain. One of the reasons caste hate speech remains underreported and under discussion is because it has become normalised. Society often reacts strongly when hate speech targets religious communities, but caste based abuse frequently passes without public scrutiny. Many people who would condemn communal hate speech do not recognise casteist language as equally harmful. This invisibilization allows caste prejudice to continue in plain sight. The language is so familiar that most of the time it escapes attention.

During the Bihar Assembly election field visits, volunteers, activists, journalists, students, and local community members repeatedly pointed to the continuing importance of caste in political mobilisation. Political discussions in many districts remained deeply shaped by caste identities, caste loyalties, and caste calculations. Yet much of the national conversation around elections focused almost entirely on religious polarisation, communal narratives, and party competition. Even sections of the liberal media that were actively documenting communal hate speech paid relatively little attention to the caste based prejudice and casteist language continued to shape political discourse. Local activists, students observed that caste-based remarks were often treated as everyday language rather than hate speech. Stereotypes about Dalit communities, comments questioning their capabilities, and narratives portraying reservations as unfair privileges frequently appeared in political discussions, social media conversations, and local debates. Because such statements have become normalised, they rarely generate the same level of public outrage as other forms of hate speech. In many cases, they are not reported, documented, or challenged. This normalisation creates a dangerous situation. Caste based hate speech becomes invisible not because it has disappeared, but because society has accepted it. The absence of public attention should not be mistaken for the absence of harm. Language plays an important role in sustaining social hierarchies. Repeated exposure to casteist

stereotypes helps legitimise discrimination and exclusion. It shapes how people view Dalits, how institutions respond to Dalit grievances, and how society understands inequality itself.

The response of institutions has often reflected this broader social reality. Although legal protections exist, caste-based verbal abuse is frequently treated as a minor issue compared to physical violence. Complaints may be ignored, minimised, or reduced to personal disputes. Because of this, many Dalits feel that the everyday forms of humiliation they experience are rarely taken seriously. Public debates tend to focus on extreme incidents of violence, while the language that helps sustain caste hierarchies receives far less attention. The challenge is not only to document caste hate speech but also to recognise it. So long as casteist language is viewed as normal, harmless, or culturally acceptable, it will continue to shape social attitudes and reinforce unequal power relations. The persistence of caste hate speech shows us that discrimination is not maintained only through laws, institutions, or acts of violence. It is also reproduced through everyday words, everyday conversations, and everyday silences.

The Hate Speech Cell intends to further develop its research on how hate speech should be understood through the perspectives of Dalit communities, women, religious minorities, persons with disabilities, and other marginalised groups. Building a more grounded understanding of harm is essential if legal responses to hate speech are to remain connected to social realities.

The manual concludes with an appendix section that serves as a practical resource for users. This section includes the full text of relevant legal provisions, sample complaint formats and templates that citizens can adapt for their own use, and a compilation of relevant international legal standards and principles that inform the regulation of hate speech.

The first draft of the Hate Speech Manual has now been completed and is currently undergoing detailed internal review. Following this process, the draft will be shared with the advisory board for expert feedback and refinement before public release. Once finalised, the manual is intended to serve as a practical resource for citizens seeking to understand, document, and legally challenge hate speech, while also contributing to a broader culture of constitutional literacy and democratic accountability.

MONITORING DURING ELECTIONS

The Hate Speech cell has found that election periods are the most important moments for monitoring hate speech in India. Across different states and different elections, the same pattern emerges. As political competition increases, public speeches become sharper and toxic, social media activity grows, and attempts to mobilise and divide through identity based narratives increase and become more visible. Election related hate speeches are important, because they shape the opinion of the masses. A speech delivered before a local crowd travels with lightning speed across villages, blocks, districts and states through news channels, social media platforms, etc. The impact extends far beyond the original audience. Narratives presented during election campaigns continue influencing public discussions, opinions after elections have ended.

Why Elections Required Special Monitoring

The objective to closely monitor elections emerged from repeated observations of the changing nature and patterns of violence. Political parties and their leaders compete intensely for public attention and in many cases divisive rhetoric is used to create strong emotional responses among people. Monitoring the election is important because hate speech during political campaigns does not only affect electoral outcomes, it also shapes relationships between different communities, deepens existing divisions, and normalises discriminatory narratives.

In a few states the HS Cell observed that communal and caste based narratives introduced during election campaigns continued to influence public discussions even after elections had concluded. For this reason, elections are not simply political events. They are also periods when public discourse can undergo significant change. Monitoring hate speech during these moments helps identify emerging trends, patterns and provides an opportunity to document narratives before they become normalised.

Key Findings

- Dominant narratives

In India the languages differ from state to state but the hate speeches rely on the same set of themes. Claim about demographic change, migration, religious conversion, interfaith relationships, citizenship, population, threats to culture & religion, etc. In some places religious minorities are portrayed as taking away jobs or resources. In some places, they are presented as threats to local traditions or national interests. The notable thing is that these narratives often

reappear across different elections and regions. They may be framed differently depending on local politics but the underlying/hidden message is largely the same, which is creating fear and suspicion around religious minority communities.

- Targeted communities

The communities targeted through hate speech vary as per the local political contexts. In 2025-26, muslims continued to be among the most frequently targeted groups in election campaigning speeches. In several states, they were portrayed as demographic threats, beneficiaries of unfair advantages, or threats to public safety and national interests.

The Hate Speech Cell also observed instances of caste-based hate speech targeting Dalits, particularly during local political discussions and election campaigns. In some regions, Christians, migrants, and other marginalised groups were also targeted through rumours, misinformation, and discriminatory narratives. The form may differ, but the common feature is the portrayal of certain communities as outsiders, threats, or obstacles to the interests of the majority population.

- Forms of hate speech used

Not all hate speech appears in the form of direct insults or explicit calls for violence. Much of what was documented during election periods relied on doing whistling, indirect language, coded messages, stereotypes, conspiracy theories, and repeated suggestions that particular communities posed a danger.

Public speeches, campaign rallies, news debates, social media photos/videos, WhatsApp messages, posters, songs, and digital content all played a role in spreading these narratives. In many cases, the most effective forms of hate speech are those that appear ordinary, making them easier to circulate without attracting immediate criticism. Election campaigns increasingly involve both offline and online spaces, allowing the same message to reach audiences through multiple channels at the same time.

- Regional Language Hate Speech

One of the most important findings of the HS Cell's monitoring efforts has been the significant role played by regional languages. A large number of hate speech does not appear in english or hindi. It is delivered in local languages, dialects and cultural forms that are most of the time overlooked by national media and the larger monitoring, recent news, volunteers, documented

speeches slogans, songs, reels, and other online stuff in several regional languages. Many of these incidents never reached national attention despite having a significant impact on local communities.

Regional language hate speeches carry local references, cultural symbols and historical grievances that make it effective. Because it is closely tied to local contexts, it can spread quickly within communities while remaining largely invisible outside them. These findings show that understanding hate speech during elections requires looking beyond nation headlines and major political speeches. Most influential rhetoric continues to emerge from local contexts, regional languages, and everyday political conversations that rarely receive wider attention.

HATE SPEECH RESEARCH

Karwan e Mohabbat's research team released a study titled India's Hate Speech Epidemic and its Failures of Justice, which was made possible through the generous financial support of Diaspora in Action for Human Rights and Democracy (DAHRD), which examines the rise of hate speech in India by mapping its scale, dominant themes, principal actors, and the diverse platforms through which it circulates, including election campaigns, religious gatherings, television studios, and social media. It explores the political, ideological, and commercial interests that sustain its proliferation, analysing the incentives for parties aligned with the Hindu Right, the role of media and digital platforms, and the influence of self-styled religious leaders in amplifying polarising narratives. The study further assesses the consequences of hate speech, linking it to targeted violence, deepening social segregation, the normalisation of fear, and the erosion of India's constitutional commitment to secular democracy. It concludes with a critical examination of the legal framework governing hate speech across electoral, religious, broadcast, print, and digital domains, evaluating patterns of enforcement, selective application, and alleged impunity, while reflecting on the risks of expanding state power to regulate speech and exploring institutional, legal, and civic strategies to counter its harmful impact.

PUBLIC DISCUSSIONS AGAINST HATE SPEECH

Building Community

The legal and social challenges posed by hate speech cannot be addressed through litigation alone. They require sustained dialogue, collective learning, and the development of shared frameworks for understanding and responding to emerging forms of discrimination and incitement.

Beyond individual cases and litigation, the Cell has sought to create spaces where lawyers, researchers, activists, journalists, students, and community members can collectively engage with the legal, social, and political dimensions of hate speech. Through its documentation, strategic litigation, and discussion forums, the Cell has gradually built a network of lawyers and volunteers who are not only equipped with legal knowledge but are also sensitised to the lived realities of communities targeted by hate speech.

As part of this effort, the Hate Speech Cell convened an in-person conference on Hate Crime and Hate Speech Law on 5 February 2026 at Jawahar Bhawan, New Delhi. The meeting brought together senior advocates, lawyers, activists, researchers, academicians, and legislators to deliberate on the feasibility and contours of a possible legal framework addressing the growing incidence of hate crimes in India. A significant portion of the discussion focused on the relationship between hate speech and hate crimes. While participants recognised that hateful expression and acts of violence are distinct legal categories, there was broad agreement that hate speech frequently creates the social conditions in which violence becomes normalised, justified, and ultimately enabled. Participants highlighted that the consequences of hate speech extend beyond physical attacks and often manifest in forms of social exclusion, economic boycotts, forced displacement, discrimination, and everyday intimidation directed at vulnerable communities. The discussion acknowledged that Indian criminal law already contains provisions dealing with incitement, preparation, and attempts to commit offences, while international standards such as the Rabat Plan of Action offer structured guidance for assessing factors such as intent, context, speaker influence, content, reach, and likelihood of harm.

There was also a shared concern that any future legislation addressing hate crimes or incitement must avoid overly broad or vague restrictions on expression. Participants emphasised the importance of precise drafting, clear legal thresholds, and robust procedural safeguards to ensure that efforts to address hate speech do not undermine legitimate freedoms of expression.

Overall, the conference reinforced the need for deeper engagement with the relationship between hate speech and violence.

Hate Speech Discussion Series

Due to the efforts of the International Advisory Group, the **Hate Speech Discussion series** was also incubated during this reporting year. The series was conceived as a forum for bringing together members of the advisory board, practitioners, researchers, and civil society organisations to examine a range of themes, including:

1. Content, scale, perpetrators and consequences of hate speech in India today.
2. Who profits from hate speech - political parties, religious hardliners and social media giants.
3. Hate speech, freedom of speech and the law: contrasting positions and dilemmas of practice of India and the US, including also holding social media corporations accountable.
4. Learnings from the experience of Strategic Litigation against hate speech in India.

The discussion series consists of a series of three-hour long discussions, scheduled either fortnightly or on a monthly basis. Each session is designed to begin with presentations that would set the context for discussion. These presentations are to be delivered by one or more of the following organizations: IAMC, HfHR, DAHRD, CSOH, and Karwan e Mohabbat (which functions as a collective campaign rather than a formal organisation). The intention is to conclude each session with a set of key takeaways and possible action points. These could include directions for further research, potential litigation strategies, or advocacy initiatives. All sessions are being recorded and will be later edited for wider public access. At the end of the seminar series, a consolidated summary, along with a practical toolkit and a call for future action, will be prepared and shared.

The first session, titled ***“Content, Scale, Perpetrators and Consequences of Hate Speech in India Today,”*** was successfully conducted on 3 April 2026. The discussion featured presentations by Raqib Naik (CSOH) and Omair Khan (Karwan e Mohabbat), moderated by Dr. Harsh Mander, with critical responses from Kunal Purohit and Dr. Indrajit Roy. The session explored the contemporary landscape of hate speech in India, emerging trends in documentation, and the social consequences of sustained campaigns of hate and exclusion.

The second session, “*Hate Speech, Freedom of Speech and the Law*,” was held on 22 May 2026. The session brought together Advocate Shahrukh Alam and legal scholar Nizamuddin Siddique as lead presenters, moderated by Dr. Harsh Mander, with a critical response from legal scholar Mohsin Alam. Discussions focused on competing approaches to regulating hate speech, constitutional protections for free expression, comparative legal frameworks, and the practical challenges involved in balancing equality, dignity, and freedom of speech.

Ye Daagh Daagh Ujala Discussion Series

Discussion 1: Rising Hate Speech in India

As part of the Hate Speech Discussion Series, Karwan e Mohabbat organised a discussion titled Rising Hate Speech in India. The discussion brought together Harsh Mander, Raqib Naik the Executive Director of Centre for Study of Organized Hate, Prof. Zoya Hasan, Political Scientist and Historian, Rohit Chopra, Professor at Santa Clara University who have long engaged with questions of democracy, minority rights, social justice, and public accountability.

The discussion titled *Rising Hate Speech in India*. The speakers reflected on how hate speech has moved beyond isolated incidents and increasingly become a part of political campaigns, media discussions, religious gatherings, and digital platforms. They discussed the ways in which repeated hateful narratives can shape public opinion, deepen divisions between communities, and normalise prejudice in everyday life. The conversation also explored the relationship between hate speech and democratic institutions. The speakers reflected on the responsibilities of political leaders, media organisations, civil society groups, and citizens in responding to the spread of hate. Particular attention was given to the ways in which hate speech affects minority communities and the challenges involved in ensuring accountability.

Drawing from both Indian and international experiences, the discussion highlighted the importance of defending democratic values, protecting constitutional principles, and creating spaces for dialogue and coexistence in an increasingly polarised environment. The session provided an opportunity for participants to reflect on the broader social and political implications of hate speech and the need for collective responses to this growing challenge.

Discussion 2: Do We Need a Hate Speech Law?

The second discussion titled Do We Need a Hate Speech Law? The discussion featured Harsh Mander in conversation with Shahrukh Alam and Nizamuddin Ahmed Siddiqui. The session

brought together perspectives from law, research, and human rights work to reflect on one of the most difficult questions facing societies today: can hate speech be effectively addressed through legal measures, and what are the limits of relying on law alone?

The discussion began with the recognition that hate speech has become increasingly visible in public life. From election rallies and news debates to social media platforms and religious gatherings, hateful narratives have found new ways of reaching large audiences. The speakers reflected on how such speech affects communities, particularly minorities, and how repeated exposure to hateful language can slowly make prejudice, exclusion, and discrimination appear normal. A major focus of the conversation was the role of law. The speakers discussed why many people demand stronger legal action against hate speech and why accountability remains important in a democratic society. At the same time, they also explored some difficult concerns. Who should decide what constitutes hate speech? Can governments always be trusted to use such powers fairly? What happens when laws meant to protect vulnerable communities are selectively enforced or misused? These were some of the questions that shaped the discussion.

The conversation also looked beyond courtrooms and legal provisions. The speakers argued that hate speech is not only a legal problem but also a social and political one. They reflected on how hateful narratives are produced, how they circulate through society, and how they often draw strength from existing inequalities and prejudices. Laws may punish some forms of hate speech, but they cannot by themselves remove the fears, stereotypes, and hostility that allow such speech to find an audience. Throughout the discussion, there was a shared concern about the growing normalisation of hate speech. The speakers reflected on how this gradual acceptance can affect public life, weaken social trust, and make communities feel increasingly insecure. The discussion offered participants an opportunity to think about both the possibilities and limitations of legal responses to hate speech. While law remains an important tool for accountability, the conversation highlighted that addressing hate speech ultimately requires broader efforts involving education, public awareness, democratic engagement, and a commitment to protecting the dignity and equality of all citizens. Rather than providing easy answers, the discussion encouraged deeper reflection on the challenges of responding to hate in a society that is becoming increasingly polarised.

Taken together, these initiatives reflect the Hate Speech Cell's understanding that combating hate speech requires more than legal intervention alone. By building both legal capacity and public awareness, the Hate Speech Cell seeks to strengthen long-term responses to hate speech and foster solidarity.

WAY FORWARD - HATE SPEECH CELLS PLANS IN THE COMING YEAR

The first year of Hate Speech Cell has demonstrated both the possibilities and limitations of our work for addressing hate speech comprehensively. The coming year will therefore focus on consolidating these learnings, strengthening existing interventions, and expanding the range of legal, educational and social responses available to challenge hate speech.

The Hate Speech Cell seeks to strengthen and expand its work for each objective and its mandate in the following manner:

1. Strengthening Strategic Litigation

The primary focus of the coming year will be to deepen and strengthen the litigation work already underway. Having intervened in over 90 instances of hate speech. A significant number of matters pursued during the reporting period have encountered barriers, including refusal to register FIRs, delays in enquiries, dismissal of complaints at the courts as well. Thus, a significant effort will be dedicated to pursuing these cases diligently and taking them to their logical conclusions. A substantial portion of the cell's litigation efforts during 2026-27 will also involve pursuing appeals, revisions and other legal remedies against adverse orders in these cases.

At the same time, the cell will continue to identify and pursue fresh instances of particularly dangerous hate speech as well as influential hate speech. Priority will be given to speeches that have the potential to contribute to discriminate, exclude, create hostility and electoral polarisation, as well as speeches delivered by highly influential political leaders, religious figures, influencers and media influencers whose statements reach large audiences and shape public discourse.

2. Election Monitoring and Electoral Accountability

Elections remain one of the most significant sites for the production and circulation of hate speech. The cell therefore intends to continue its election monitoring programme across majors states and elections taking place in 2026-2027.

This work will involve systematic monitoring, documentation, transcription, translation, legal assessment and complaint filing. Alongside the cases already initiated during elections, documentation is currently underway in relation to 18 incidents arising from the Assam elections, while 51 instances of potentially unlawful hate speech delivered during the West Bengal elections are presently being documented, translated, and assessed for possible legal intervention. In addition to criminal complaints, the Hate Speech Cell is exploring the use of

election law remedies in appropriate cases. As a pilot intervention, the Cell aims to initiate at least one election petition during each major election cycle where evidence indicates that candidates or campaigners have engaged in speech that may amount to corrupt electoral practice or otherwise violate the legal framework governing elections.

3. Expanding Legal Interventions Against Hate Speech in News Media

An important area of focus in the coming year will be the use of existing domestic regulatory frameworks to challenge hate speech disseminated through television news channels, print media, and digital news platforms. For print media, the cell intends to explore complaints before the Press Council of India i.e. the relevant self-regulatory and statutory mechanisms. For television news, interventions will focus on available grievance redressal mechanisms, including broadcasters' internal ombuds processes such as the News Broadcasting & Digital Standards Authority (NBDSA).

The cell will also examine the use of parallel legal remedies in the form of criminal complaints under the Bharatiya Nyaya Sanhita, 2023 and other relevant statutes to hold the hosts, the news channels and other responsible actors accountable in the process

4. Challenging Hate Speech on Social Media Platforms

The growing role of social media platforms in amplifying hate speech presents a distinct challenge that requires a dedicated strategy. Going forward, the Hate Speech Cell intends to strengthen its understanding of the regulatory framework governing social media intermediaries in India and develop specialised strategies for addressing hateful content online. This process will be informed by internal training, comparative research, and engagement with members of the advisory group who have experience working on platform accountability and digital regulation in other jurisdictions.

Building on these learnings, the Cell intends to make systematic use of the grievance redressal mechanisms available on social media platforms to seek the removal of content that violates platform policies relating to hate speech and incitement. Where internal platform processes prove ineffective, the Cell will explore escalation mechanisms available under Indian law, including complaints before relevant authorities such as the Ministry of Electronics and Information Technology (MeitY) and the Ministry of Information and Broadcasting (MIB), as well as other available regulatory remedies.

Alongside these platform-based and regulatory interventions, the Cell will continue to examine the scope of criminal and civil legal remedies in appropriate cases. This includes exploring

strategies to secure the preservation of digital evidence, obtain relevant platform records where legally permissible, and assess circumstances in which intermediaries may bear legal responsibility for facilitating or continuing to host unlawful content despite notice and opportunity to act.

5. Popular Legal Education and Citizen-Led Accountability

The objective of the Hate Speech Cell through the Hate Speech Manual is not merely to produce a legal resource but to enable ordinary citizens, community organisations, students, activists and lawyers to independently challenge hate speech using existing legal mechanisms.

The coming year will therefore focus on transforming the knowledge generated through strategic litigation into a practical and interactive interface that can be used by individuals themselves. The long-term objective is to build citizen-led platforms capable of documenting incidents, filing complaints and sending reminders to the police without requiring direct intervention from the Hate Speech Cell.

6. Expanding Public Discussions, Research, Networks, and Awareness

The Hate Speech Cell will continue organising seminars, workshops, discussion series, and public conversations aimed at building greater awareness about the nature, consequences, and regulation of hate speech. These efforts aim to not only disseminate legal knowledge but to encourage deeper public engagement with questions of equality, free speech, accountability and constitutional values. The cell intends to bring together lawyers, academics, journalists, scholars, activists, students, policymakers and communities in order to calculate constructive dialogue on these issues. A key lesson from the first year has been that effective documentation and intervention require strong local networks. The Cell therefore intends to expand its network of volunteers, lawyers, researchers, translators, journalists, and community organisations across different states.

The Hate Speech Cell's work in the coming year will therefore continue to combine strategic litigation with research, popular legal education, public engagement, and partnership-building. Together, these efforts seek to strengthen accountability, expand access to justice, and contribute to a public culture that is more resistant to hatred, discrimination, and exclusion.

OUR REFLECTIONS & OBSERVATIONS

The year 2025-26 showed that hate speech is no longer something that happens only once in a while in India. It has become a regular part of political and social life. The rise in incidents across the country shows that hate speech is not just a matter of anger or prejudice. It is often used as a way to influence people, build support, and shape public opinion. Centre for the Study of Organised Hate (CSOH) recorded more than a thousand hate speech events in 2025 alone. That number matters not only because it is large, but because it shows how public discourse is changing. Hate speech today is more common, more organised, and more openly spoken than before. Many speeches that earlier would have stayed local now spread very quickly through social media and digital news platforms, reaching people across the country within hours.

The experience of the Hate Speech Cell during this reporting period shows many of these wider trends. Through election monitoring, strategic litigation, field visits, volunteers' experiences, and documentation work, the HS Cell observed that hate speech mostly increases during moments of political importance, especially elections, religious events, religious festivals, public controversies, and periods of social tension. Many of the speeches documented during the year were not random or isolated remarks. They often appeared at moments when political leaders, religious gurus, influencers or organised groups were trying to influence public opinion, gather support, or create a sense of division between communities. A common feature of many speeches documented by the HS Cell was the portrayal of minorities as a threat to the nation, so-called culture etc. Different speakers used different languages, but the message was same. Minority communities were presented as threats to religion, culture, national security, local traditions, or even economic growth and opportunities. In many cases, these claims were not supported by evidence, yet they were repeated frequently in public meetings, election rallies, religious gatherings, TV news debates, and social media videos. Over time, such repeated messages can create fear and suspicion, even among people who may have little direct interaction with the communities being targeted. [Bihar Field visit notes, Bihar, 2025 October]

One of the most concerning developments observed during the year was the growing normalisation of hate speech. Fifteen or twenty years ago, openly calling for discrimination against an entire community or making inflammatory and derogatory comments against religious minorities would often attract widespread criticism. Such statements would generally be seen as unacceptable by majority community. Today, the situation appears different. Similar remarks are often delivered from public stages, election platforms, religious events, television studios, and social media channels without much concern about consequences. In many cases,

hate speech no longer generates the shock it once did. Public attention moves quickly from one controversy to another. A speech may attract criticism for a few days and then disappear from public discussion. Some speakers continue making similar statements repeatedly, knowing that the chances of facing serious consequences remain limited. This has created a situation where hate speech is increasingly treated as a normal part of political and public debate rather than as something that threatens social harmony.

The impact of this normalisation can be seen beyond politics. Hate speech affects everyday relationships between people. It influences how communities see one another and how social problems are understood. When people repeatedly hear that a particular community is dangerous, disloyal, or responsible for society's problems, these ideas can slowly become part of everyday thinking. Neighbours, friends, colleagues begin to look at each other with suspicion. Mistrust grows between communities. Rumours become easier to believe because they fit existing fears and prejudices. Gradually, repeated exposure to such narratives can make discrimination appear ordinary and exclusion seem acceptable. People may begin to see unequal treatment of certain communities as justified or necessary. In this way, hate speech does not simply reflect prejudice that already exists. It can actively deepen divisions, strengthen stereotypes, and shape public attitudes in ways that become difficult to reverse.

The Economics of Hate

One thing that became increasingly clear during the reporting period was that hate speech is not spreading only because people believe in it. It is also spreading because there are systems that reward it. During field visits in Bihar in October 2025, volunteers repeatedly observed how political speeches delivered at local rallies would quickly appear on social media, often reaching far larger audiences than the people who had actually attended the event. In many places, people were discussing clips they had seen online rather than speeches they had personally heard. Social media platforms are designed to keep people watching, clicking, sharing, and reacting. The longer people stay on an app, the more advertisements they see, and the more money the platform earns. Because of this, content that creates strong emotions often performs better than ordinary content. Anger, fear, outrage, and controversy attract attention. A speech that targets a community or makes a shocking claim is often shared more widely than a speech discussing employment, education, healthcare, or local development.

Prof. Pushpendra during the Bihar visit said that clips from political rallies were often edited into short videos and circulated through WhatsApp groups, Facebook pages, YouTube

channels, and other platforms. In many cases, the most provocative part of a speech was the section that travelled the furthest. People rarely shared long discussions about public policy. Instead, short clips containing communal allegations, inflammatory statements, or attacks on particular communities often received the most attention. This has created incentives for many different actors. Influencers gain followers by posting controversial content. Content creators earn money when their videos receive large numbers of views. Political leaders receive publicity when their statements generate debate and media coverage. Television channels frequently replay controversial speeches because they attract viewers and increase engagement. Even people with relatively small online audiences can rapidly increase their visibility by posting divisive content. A retired Indian Air Force soldier from Bihar observed that some local political meetings appeared to be organised with social media audiences in mind as much as the people physically attending. Speeches were delivered before a few hundred people, but cameras and mobile phones were constantly recording. It often seemed that the real audience was not the crowd standing in front of the stage but the thousands of people who would later watch the videos online.

In this environment, outrage has become valuable. The more people react, argue, share, or express anger, the more visible the content becomes. Social media platforms benefit because engagement increases. Influencers benefit because their audience grows. Political actors benefit because their message reaches more people. News channels benefit because controversy attracts viewers. Each of these actors may have different goals, but they all gain something from content that keeps public attention focused on conflict and division. Hate speech today is not only a social or political issue. It has also become part of an Indian economy where visibility itself has value. The more provocative a statement is, the more likely it is to be circulated, debated, and amplified. This helps explain why certain narratives continue to appear again and again across rallies, television debates, and social media platforms, even when they contribute little to meaningful public discussion

Indian Elections: Peak Periods of Hate Speech

One of the clearest findings emerging from the work of the Hate Speech Cell is the close relationship between elections and hate speech. Election periods create intense competition for attention. Political actors seek to distinguish themselves from opponents, energise supporters, and influence undecided voters. Under such conditions, hate speech often becomes a tool for rapid mobilisation because it generates strong emotional responses and receives extensive media coverage.

The Delhi Assembly elections provided a particularly revealing example. The Hate Speech Cell documented multiple cases in which election campaigning relied upon communal narratives rather than policy-schemes discussions. Several speeches portrayed Muslims as demographic threats, questioned their loyalty, linked them to criminality, or suggested that state resources were being unfairly distributed in their favour. The repetition of such words across different speeches shows that these were not isolated remarks but part of a broader pattern of political communication. The importance of these speeches lies not only in their content but also in their timing. They happen during an election period when politicians were actively competing for public support. In these times, hate speech serves a dual purpose. First, it mobilises supporters by appealing to religious identity. Second, it shifts public discussion away from governance issues to communal hatred. The large number of complaints pursued by the Hate Speech Cell during and after the Delhi elections indicates the extent to which communal rhetoric became intertwined with electoral mobilisation.

The preparations undertaken for the Bihar Assembly elections opened up similar issues. Through visits during the first phase of the Hate Speech project to all thirty-eight districts and extensive engagement with Karwan Volunteers, locals, journalists, activists, political party representatives, students etc. and visit before the election the Hate Speech Cell found out that growing speeches regarding the use of communal narratives during the election cycle. Bihar presents a unique political landscape where caste, class, and community identities interact in complex ways. Yet even within this environment, there were concerns that religious polarisation could increasingly be used to reshape electoral debates. The expansion of social media has further increased these risks, allowing rumours, misinformation, and communal narratives to travel rapidly across districts. Similar patterns were visible beyond Delhi and Bihar. In Assam, election-related rhetoric hates speeches frequently intersected with debates concerning citizenship, migration, belonging, and demographic change. These themes have become central features of political discourse in the state and often create conditions in which minority communities are portrayed as demographic and political threats. Several of the strategic litigation matters pursued during the reporting period emerged from such narratives. In West Bengal, communal speeches continued to appear alongside broader political contestation. Religious identity increasingly featured in political campaigns, public speeches, and digital mobilisation efforts. The state's long history of political competition has created an environment in which communal narratives can become powerful electoral tools during periods of heightened political activity. In Kerala and Tamil Nadu, the scale of election-related hate

speech remained lower than that observed in several northern states. Nevertheless, monitoring organisations documented attempts by various actors to introduce religious polarisation into public discourse. Digital platforms played a particularly important role in these efforts. Even where communal mobilisation did not dominate mainstream electoral politics, social media¹ networks enabled divisive narratives to circulate widely and influence public conversations.

Taken together, these developments show that hate speech during elections is not an isolated phenomenon confined to particular regions or political contests. Instead, it has become part of a broader political culture in which identity-based mobilisation increasingly overshadows policy-based debate. It is the weapon-of-choice of the BJP during elections. The specific forms of hate speech vary across states, reflecting local histories and political realities. Yet, the underlying objective remains remarkably consistent- to create fear, deepen divisions, consolidate support, and influence electoral outcomes.

Beyond Law: The Challenge Ahead

The experiences of 2025-26 shows us that hate speech cannot be addressed through legal intervention alone. Criminal complaints, court proceedings, and strategic litigation remain essential tools for accountability. But, the continuation of hate speech despite existing legal provisions points to a deeper problem. Hate speech survives because it is socially tolerated, politically useful, digitally amplified, and economically rewarding. Addressing it therefore requires more than punishment after the fact. It requires stronger democratic institutions, responsible political leadership, greater platform accountability, public education, independent media, and sustained efforts to rebuild trust across communities.

The challenge confronting India today is not merely the regulation of hateful speech. It is the defence of a democratic culture in which equality, dignity, and citizenship remain stronger than fear, prejudice, and division.

¹ <https://academic.oup.com/edited-volume/60551/chapter-abstract/523644749?redirectedFrom=fulltext>