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2821, Anand Bhuvan,
Veer Savarkar Path
RATNAGIRI
MAHARASHTRA - 415 612

Registered A.D.

To,

1. Shri. Digvijay Singh
General Secretary
Indian National Congress
11, Akbar Road, New Delhi
2. Indian National Congress
Through The President
Indian National Congress
Central Office, 11, Akbar Road,
New Delhi

Under instructions and authority from my client Shri. Bhiku Ramji @ Dada Idate of Dapoli in Ratnagiri District of Maharashtra State, I have to address you as under;

That you no. 2 are a registered Political Party, having its Central Office at 11, Akbar Road, New Delhi, whereas you no.1 are the General Secretary thereof. You no.1 have also worked as Chief Minister of Madhya Pradesh in past. As such, you no.1 are expected to be a responsible person in the society.

As you know and / or as you are expected to know, Rashtreey Swayansevak Sangh (RSS) is a nation based Association of Nationalistic Hindustani Persons. RSS has also been rendering multifareous yeoman services to Indian Society. RSS is also known for its National Integrity Spirit.

My client is permanent resident of Dapoli in Ratnagiri District of Maharashtra. He is a staunch follower of RSS and propogates RSS philosophy. He has been associated as Swayansevak with the Rashtriya

Swayansevak Sangh (RSS) for about last 50 years. My client has worked for 9 years as Sahakaryavah of RSS Maharashtra and as Karyavah for 7 years. He has also worked as Bauddhik Pramukh of Maharashtra, Gujrat and Goa for 11 years. Presently, he is working as the National Convener of Samajik Samarasata Manch.

My client has recently come to know from newspapers that you no.1 are making false and defamatory statements concerning RSS, either recklessly or intentionally or at the instance of you no.2 above. Recently, in your press conference, you no.1 made a statement that 'RSS is a Bomb making factory.' Your statement was totally false and was per se defamatory and the same was given wide publicity by the press. Even thereafter, you kept on making similar wild defamatory statements at various places before press and media.

My client further submits that you no.1 were thereafter interviewed by Shri Karan Thapar of CNN-IBN, and the same was a live telecast. Even at that time, You not only maintained that you did make the said statement, but you no.1 tried to justify the same allegation in your interview. You no.1 further added that you have evidences with you to prove your statements. However, till this time, neither my client nor any of the media persons are informed that you have ever refuted such statement having been made, or have tendered any of the so called evidences that you claim to possess to the Police, Press or to any investigating agency.

My client further submits that at all times when you made the defamatory statements referred to above, you carried your designation as All India General Secretary of Indian National Congress with you no.1. Even the same was made a part of the news item and was so displayed on TV. Indian National Congress was in the know of such statements having been made by you no.1. Still, neither you no.2 nor any office bearer or any responsible leader of your party has ever disowned these statement by clarifying that the same is individual opinion of you no.1, nor you no.2 have taken any appropriate action against you no.1. As such, please note that Indian National Congress is also a party to the making of this statement and therefore, is liable for its consequences.

My client contends that you both knew or had reason to believe that RSS is not even remotely concerned with any such activities like bomb making. Still, out of political and social vendetta and jealousy that these statements and imputations of above reference were made you, in concert. These imputations were made with an intention to harm reputation of RSS.

In any case, my client further contends that, you both were knowing or had reason to believe that these statements will harm the reputation of Rashtreeya Swayanasevak Sangh. Your statements have strongly hurt the feelings of my client and of all other Swayansevaks. As such, you both have committed offence of defamation, within the meaning of section 499 of IPC and you are liable to be convicted and to be sentenced for imprisonment and to pay fine, as per provisions of section 500 of IPC.

You no.1 claim that you had evidences to prove authorship of the so called bomb making factory, which is another offence within your knowledge. In that case, it was your bounden duty to inform and to submit all those evidences to police or to investigating agencies; but you have failed to discharge your statutory responsibility. As such, if your statement is true, it will mean that you no.1 have attempted to suppress information or evidence regarding commission of a heinous crime and have committed another criminal offence which you may please note.

As a staunch RSS worker and Swayanasevak, my client is deeply aggrieved by your baseless and false defamatory imputations. My client could have directly filed criminal prosecution in a court of law against both of you. However, being a swayanasevak and a senior citizen, my client intends to give you an opportunity to avoid facing prosecution by tendering written apology to RSS. As such, my client is serving you with this notice.

My client hereby calls on you both to tender immediate unconditional written apology to RSS and to my client for your baseless defamatory statements, with a similar statement by you to press and media. In case either of you fail to tender the apology within a period of 15 days from the receipt of this notice, please note that, my client will be constrained to file criminal case against both or either of you for having committed offence of

defamation and for any other offence that may appear to have been committed by you, in the Court of Judicial Magistrate First Class at Dapoli, where my client resides, and/or at other places, as he may be advised.

My client also hereby calls on you to note that my client hereby reserves right to claim damages and/or any other reliefs in a civil court of law, in addition to availing remedy of filing criminal prosecution against you both. Please note that in such case, you both will be jointly and/or severally liable for all the costs, including costs of this notice, and consequences thereof, which you may please note.

A copy hereof is retained by my client and two originals are being sent to you today by R.P.A.D. on this 29th day of August 2011.

Contents afore stated are true &
correct as per my instructions

Advocate
