

RAJESH KHANNA
M.A.LLB
Advocate
Pb. Haryana High Court,
Chamber No. 322
New Courts, Jalandhar

Phone: Resi: - 2231977
(M) 94170-30977
Resi: - 'ASHA', 1009
Mohalla Gobindgarh
JALANDHAR-144001

Dated: 17/04/2022

To

Mr. Raghav Chadha
~~E~~ Vice Chairman- Delhi Jal Board,
Member of Parliament Rajya Sabha,
National Spokesperson, National Executive Member
Aam Adami Party, Rajinder Nagar, Delhi-
And R/o 473, Block Double Storey,
New Rajinder Nagar, New Delhi-11060

Subject: - Legal Notice U/s 499/500 of IPC.

Sir,

Under the instructions of my client Mr. Ashok Sareen, State Vice President, Bhartiya Janta Yuva Morcha, (Youth wing of BJP), 13/10, Central Town, Jalandhar, I do hereby serve you with the following legal notice:-

1. That my client a well reputed and well educated persons having qualification of B.A. LL.B. and devoted and is the active member of BJP and remained as General Secretary of BJP Youth Wing, Jalandhar and at present is State Vice President, Bhartiya Janta Yuva Morcha, (Youth wing of BJP).
2. That my client received a severe shock of his life on 16-04-2022 by going through your press conference which was displayed on your official social media facebook account in which, you have stated that 'Bhartiya Janta Party matlab Bharat Ki Zahil Party' and further stated that 'BJP Gundon ki, Lafangon ki party ban gayi hai' and apart from this you have further stated plenty of derogatory and defamatory words regarding B.J.P.
3. That my client who is devoted BJP worker which is known for its discipline, honesty and nationalism has received deep shock and the reputation of the party and its activists has also tarnished by you with pre-meditated mind and it has also hurt the sentiments of my client.
4. That the press conference was circulated in Jalandhar and in various parts of India several enquiries were made from my client by the persons of the locality and by his colleagues.
5. That by mentioning the name of BJP in the above press conference which you have made falsely and maliciously concerning the said organizations you have successfully lowered the reputation and created ill will against them in the minds of the persons of the society by leveling a very serious false allegation against the organizations. The above said utterance on your part is derogatory, defamatory and tantamount to the character assassination of the entire BJP.

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6. That after the said press conference/utterances, the persons of the society particularly of the locality of my client have began holding him in low esteem.
7. That the above stated remarks are defamatory and misleading. It is a pre-meditated plan and with due consultation and in criminal conspiracy the character was assassinated by you intentionally and it has caused mental agony and harassment to my client.
8. That through said utterance and by using illegal, provocative words intentionally, knowingly and mischievously having reason to believe that such imputation will harm the reputation you have tried to create and promote feeling of enmity and ill-will against BJP.
9. That so you are liable to compensate my client for defamation for mental harassment and for mental agony suffered by him and you further are liable to be prosecuted U/s 499/500 of IPC. *& under other various provisions of law.*

You are called upon through this legal notice to tender written apology to my client and to entire BJP Organization within 3 days from the receipt of this legal notice, failing which, I have instruction to file civil and criminal complaint against you in that event you will be held responsible for all costs and charges incurred by my client.

Copy Kept



Rajesh Khanna
Advocate Jalandhar