

Ref No. DSK/KSN/2022-23/1

Date: 24.07.2022

BY EMAIL/SPEED-POST/COURIER

WITHOUT PREJUDICE

To,

- 1) Mr. Pawan Khara
24, Akbar Road,
New Delhi – 110001
Email: pawankhera4@gmail.com
- 2) Mr. Jairam Ramesh
C-1/9, Lodhi Garden,
Rajesh Pilot Marg,
New Delhi – 110003
Email: jairam@sansad.nic.in
- 3) Ms. Netta D'Souza
24, Akbar Road,
New Delhi – 110001
Email: dsouzanetta@gmail.com
- 4) Indian National Congress
Through its President
24, Akbar Road,
New Delhi – 110001
Email: president@ainc.in

**Subject: LEGAL NOTICE TO CEASE AND DESIST FROM DISSEMINATION OF
DEFAMATORY, DEROGATORY, FALSE AND MISLEADING
INFORMATION / ALLEGATIONS.**

Dear Sirs & Ma'am,

We write to you for and on behalf of our Client, Mrs Smriti Irani (“**Our Client**”). Our Client is a Minister in the Union Cabinet of India currently administrating the Ministries of Women and Child Development and Ministry of Minority Affairs.

Our Client has placed in our hands, certain *ex-facie* defamatory, malicious and blatantly false information and allegations which are being disseminated in public domain by and on behalf of the Addressees.

All of you have conspired with each other and with other unknown individuals/ organisations to launch a series of scathing and belligerent personal attacks against Our Client, with the oblique motive to malign, defame and injure Our Client and her family's reputation based on a series of blatant falsehoods and gross misrepresentations.

Accordingly, under the instructions of Our Client, we address the present legal notice to the Addressees as under:

1. Our Client, Mrs. Smriti Zubin Irani is a highly respected citizen of India and presently holds position with the Government of India.
2. On 23.07.2022, Our Client came across a press briefing in which it was alleged that:
 - a. While the Congress Party did not like to target family members, the allegations that followed amounted to acts of corruption committed by Our Client and her family members.
 - b. Her 18 year old daughter, Ms. Zoish Irani is "running" a bar in Goa by the name of 'Silly Souls Café & Bar'.
 - c. Ms. Zoish Irani has been served by a show cause notice issued by the Goa Excise Authorities, and this purportedly suggested corruption on the part of Our Client.
3. These allegations were made by the Addressees Nos. 1 to 3 through a press briefing organised by and at the behest of the Addressee No. 4 at 24, Akbar Road, New Delhi - 110001, published and circulated on various social media platforms across India, which is accessible on the internet from any part of the world.
4. Our Client's daughter, Ms. Zoish Irani has never been involved in "running" a bar in Goa.

5. She has never applied for any license for “running” any bar or for any business enterprise. Moreover, she has not been served with any show cause notice from Excise Department, Goa till date.
6. The Addressees have stooped to a new low, morally and ethically, by attacking Our Client’s 18 year old daughter who is in her 1st year at university and at the threshold of a new chapter of her life pursuing her professional aspirations. These aspirations of Our Client’s daughter are sought to be cruelly marred, jeopardised and prejudiced by the Addressees through their inhumane, insensitive and false narratives, as collateral damage.
7. Such baseless and false allegations have been published on the various social media platforms, some of which are as follows:

Sr. No	Allegation made by the Addressees	Platform / Publisher
a.	“.#स्मृति_ईरानी_चुप्पी_तोड़ो Congress Party Briefing by Shri Jairam Ramesh and Shri Pawan Khera at AICC HQ.” YouTube Video	https://www.youtube.com/watch?v=iwVBID4JSmI Date: 23.07.2022 Source: YouTube
b.	“स्मृति ईरानी के पारिवारिक भ्रष्टाचार की गाथा” Excerpts of the congress party briefing Instagram Account - INCINDIA	https://www.instagram.com/p/CgWVr8bp7xR/ Date: 23.07.2022 Source: Instagram
c.	“हम 'अखबार' भी चलाएं तो हो जाते है बदनाम...”	https://www.instagram.com/p/CgWQ11rJY4r/

	<p>वो 'बार' भी चलाएं तो चर्चा नहीं होता□□♂”</p> <p>Instagram Account - INCINDIA</p>	<p>Date: 23.07.2022</p> <p>Source: Instagram</p>
d.	<p>“Dear PM Modi, you talked so much about getting the country rid of corruption. Can you take an action on these incidents of corruption by a minister of your own cabinet?</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो”</p> <p>Instagram Account - INCINDIA</p>	<p>https://www.instagram.com/p/CgWKxYaJGt1/</p> <p>Date: 23.07.2022</p> <p>Source: Instagram</p>
e.	<p>“Story of the spineless.”</p> <p>Instagram Account - INCINDIA</p>	<p>https://www.instagram.com/p/CgWDupCp61r/</p> <p>Date: 23.07.2022</p> <p>Source: Instagram</p>
f.	<p>“LIVE: Congress Party Briefing by Shri @Jairam_Ramesh and Shri @Pawankhera at AICC HQ.</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो “</p> <p>Twitter handle - @INCIndia</p>	<p>https://twitter.com/INCIndia/status/1550731113542193153?s=20&t=W6IzYBylmAQS5XhpDzUKUg</p> <p>Date: 23.07.2022</p> <p>Source: Twitter</p>
g.	<p>“सत्ता के नशे में ये ऐसे चूर हैं, फर्जीवाड़ा कर भी कितने मगरूर हैं!</p>	<p>https://twitter.com/INCIndia/status/1550778387483856896?s=20&t=W6IzYBylmAQS5XhpDzUKUg</p>

	#स्मृति_ईरानी_चुप्पी_तोड़ो” Twitter handle - @INCIndia	Date: 23.07.2022 Source: Twitter
h.	इस गैरकानूनी रेस्टोरेंट/बार को नोटिस देने वाले आबकारी आयुक्त के ट्रांसफर की तैयारी शुरू की जा चुकी है। क्या यह स्मृति ईरानी जी के हस्तक्षेप के बिना हो रहा है? क्या यह लाइसेंस उनके प्रभाव के बिना मिला? : श्री @Pawankhera “#स्मृति_ईरानी_चुप्पी_तोड़ो” Twitter handle - @INCIndia	https://twitter.com/INCIndia/status/1550767685906026496?s=20&t=W6IzYBylmAQS5XhpDzUKUg Date: 23.07.2022 Source: Twitter
i.	हैरानी की बात यह है कि आपके समर्थकों के बच्चे नमाज और हनुमान चालीसा की लड़ाई लड़ें और आपके बच्चे या तो विदेशों में पढ़ें या आपके 'आशीर्वाद' के सहारे इस तरह के गैरकानूनी काम करें : श्री @Pawankhera “ स्मृति_ईरानी_चुप्पी_तोड़ो” Twitter handle - @INCIndia	https://twitter.com/INCIndia/status/1550765158435258368?s=20&t=W6IzYBylmAQS5XhpDzUKUg Date: 23.07.2022 Source: Twitter
j.	गोवा में स्मृति ईरानी जी की बेटी द्वारा चलाए	https://twitter.com/INCIndia/

	<p>जा रहे एक 'रेस्टोरेट' पर फर्जी लाइसेंस लेने का आरोप है।</p> <p>वह लाइसेंस एक ऐसे व्यक्ति के नाम पर है, जिनका देहांत मई 2021 में हुआ और लाइसेंस जून 2022 में लिया गया : श्री @Pawankhera</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Twitter handle - @INCIndia</p>	<p>status/1550761910504603648?cxt=HHwWgICq7bjvtIUrAAAA</p> <p>Date: 23.07.2022</p> <p>Source: Twitter</p>
k.	<p>इन बार चलाने वालों को हम अखबार चलाने वालों से बड़ी दिक्कत है।</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Twitter handle - @INCIndia</p>	<p>https://twitter.com/INCIndia/status/1550755886905184256?s=20&t=J2-TnWsCVM9VVIZSM26rwg</p> <p>Date: 23.07.2022</p> <p>Source: Twitter</p>
1.	<p>बार' से सरोबार 'सरकार' को अखबार से क्यों बैर?</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Twitter handle - @INCIndia</p>	<p>https://twitter.com/INCIndia/status/1550752913735032832?s=20&t=J2-TnWsCVM9VVIZSM26rwg</p> <p>Date: 23.07.2022</p> <p>Source: Twitter</p>
1.	<p>"The Modi govt didn't spare the dead in their GST implementation. Their minister is not sparing the dead in her fraudulent illegal businesses.</p>	<p>https://twitter.com/INCIndia/status/1550750058865475584?cxt=HHwWgIC-ocu9r4UrAAAA</p>

	<p>#स्मृति_ईरानी_चुप्पी_तोड़ो”</p> <p>Twitter handle - @INCIndia</p>	<p>Date: 23.07.2022</p> <p>Source: Twitter</p>
m.	<p>“LIVE: Congress Party Briefing by Shri Jairam Ramesh and Shri Pawan Khera at AICC HQ.</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो”</p> <p>Facebook Page – Indian National Congress</p>	<p>https://fb.watch/erwu5nkd4M/</p> <p>Date: 23.07.2022</p> <p>Source: Facebook</p>
n.	<p>“The voice which is loud every time it attacks others on baseless BJP-made agendas is quiet on the fraud committed by her own family. Why?</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो”</p> <p>Facebook Page – Indian National Congress</p>	<p>https://www.facebook.com/photo/?fbid=614046733416182&set=pb.100044325824967.-2207520000..</p> <p>Date: 23.07.2022</p> <p>Source: Facebook</p>
o.	<p>सिर्फ अपनी सियासत चमकाने के लिए दूसरों पर कीचड़ उछालने वाली स्मृति ईरानी जी आज खामोश हैं!</p> <p>चुप्पी तोड़िए.. जवाब दीजिए।</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Facebook Page – Indian National Congress</p>	<p>https://www.facebook.com/photo?fbid=614046143416241&set=a.544066273747562</p> <p>Date: 23.07.2022</p> <p>Source: Facebook</p>

p.	<p>The government would take no action. The godi media would not talk about this.</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Facebook Page – Indian National Congress</p>	<p>https://www.facebook.com/photo?fbid=614045103416345&set=a.544066273747562</p> <p>Date: 23.07.2022 Source: Facebook</p>
q.	<p>सत्ता के नशे में ये ऐसे चूर हैं, फर्जीवाड़ा कर भी कितने मगरूर हैं!</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो</p> <p>Facebook Page – Indian National Congress</p>	<p>https://www.facebook.com/photo/?fbid=614044723416383&set=pb.100044325824967.-2207520000..</p> <p>Date: 23.07.2022 Source: Facebook</p>
r.	<p>“The Modi govt didn't spare the dead in their GST implementation. Their minister is not sparing the dead in her fraudulent illegal businesses.</p> <p>#स्मृति_ईरानी_चुप्पी_तोड़ो”</p> <p>Facebook Page – Indian National Congress</p>	<p>https://www.facebook.com/photo/?fbid=614044273416428&set=pb.100044325824967.-2207520000..</p> <p>Date: 23.07.2022 Source: Facebook</p>
s.	<p>एक मरे हुए व्यक्ति के नाम का दुरुपयोग कर अपनी तिजोरियां भरने से ज्यादा बेशर्मी और क्या होगी!</p> <p>इनकी वाहि्यात और दोहरी मानसिकता आज पूरा देश देख रहा है।</p>	<p>https://www.facebook.com/photo/?fbid=614043840083138&set=pb.100044325824967.-2207520000..</p> <p>Date: 23.07.2022</p>

	#स्मृति_ईरानी_चुप्पी_तोड़ो Facebook Page – Indian National Congress	Source: Facebook
t.	Story of the spineless. #स्मृति_ईरानी_चुप्पी_तोड़ो Facebook Page – Indian National Congress	https://www.facebook.com/photo/?fbid=614040890083433&set=pb.100044325824967.-2207520000.. Date: 23.07.2022 Source: Facebook
u.	झूठ से सच तक का सफर... #स्मृति_ईरानी_चुप्पी_तोड़ो Facebook Page – Indian National Congress	https://www.facebook.com/photo/?fbid=614040546750134&set=pb.100044325824967.-2207520000.. Date: 23.07.2022 Source: Facebook

The contents of all the above videos, posts and tweets (listed from row no. ‘a’ to ‘u’ above) are herein after collectively referred to as the “Allegations”

8. The falsities of the Allegations and infringing statements is writ large from the fact that the purported Show Cause Notice issued by the Excise Commissioner of Goa flashed by the Addressee No. 1 in the above said press conference alluding to have been issued against Our Client’s daughter is factually incorrect from a bare perusal of the said document.
9. These Allegations are sought to be sensationalized and magnified by a series of innuendos and suggestive statements which not only hurt Our Client and her daughter’s reputation but are equally an attempt at outraging their modesty.

10. The insistence of Addressees to invoke value systems of Our Client with a reference to her 'sanskar' is an effort to make Our Client and her young daughter social outcastes by proclaiming that by the act of 'running' a bar Our Client and her young daughter are women of disrepute.
11. The Allegations made by the Addressees against Our Client contain *ex-facie* false, baseless and unsubstantiated information which is being published and disseminated publicly, without any verification by you, the Addressees and yet, being accessed by members of the public at large, all around the world. This is a part of a larger conspiracy to garner political mileage by sensationalizing falsities, misrepresentations and false narratives; and obviously is with a motive to injure the reputation, goodwill, social and political standing as also the character of Our Client.
12. Our Client is distressed that these allegations have been made with the knowledge of their falsity, or at least in careless disregard of the truth.
13. The false allegations were intended to hurt the reputation of Our Client as a minister and a person in public life, and also to outrage her modesty and that of her daughter. These are serious offences under the Indian Penal Code and also a tort making the Addressees liable to penal damages.
14. In the circumstances as mentioned hereinabove, we hereby call upon Addressees to:
 - a. tender a written unconditional and unequivocal apology forthwith to Our Client and not later than Twenty Four (24) Hours from the receipt of this Notice, which should be widely disseminated in print media and on social media;
 - b. unconditionally withdraw the Allegations with immediate effect and cause to remove all such false information from all platform(s) such as www.YouTube.com, www.Twitter.com, www.Facebook.com,

- www.Instagram.com, disseminating the Allegations, including but not limited to the Allegations;
- c. cease and desist from disseminating any content whatsoever, arising out of or in any connection with the Allegations and / or similar content thereto in respect of Our Client and her daughter, Ms. Zoish Irani;
 - d. ensure that all the record of the Allegations is permanently deleted and the same is never disseminated / re-circulated in future;
15. In case of failure of Addressees to do the acts mentioned in the preceding paragraph no. 14, Our Client would be constrained to initiate appropriate civil and criminal proceedings against the Addressees for such illegal acts, which shall be solely at the costs and consequences of the Addressees.
16. The present notice has been issued without prejudice to all rights and contentions of Our Client.

Yours sincerely,



Kirat Singh Nagra

Partner