

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) NO. ____ OF 2019

IN THE MATTER OF:

Petitioner

Versus

1. Union of India
Through the Secretary
Ministry of Home Affairs,
Secretariat, New Delhi
2. Union of India
Through the Secretary
Ministry of Law and Justice
Shastri Bhawan, New Delhi.
3. State of Andhra Pradesh
Through the Chief Secretary
Secretariat Hyderabad
(Andhra Pradesh)
4. State of Assam
Through the Chief
Secretary Secretariat
Dispur (Assam)
5. State of Bihar
Through the Chief
Secretary Secretariat
Patna (Bihar)
6. State of Chhattisgarh
Through the Chief

Secretary Secretariat
Raipur (Chhattisgarh)

7. State of Goa
Through the Chief
Secretary Secretariat
Panaji (Goa)
8. State of Gujarat
Through the Chief
Secretary Secretariat
Gandhi Nagar (Gujarat)
9. State of Haryana
Through the Chief
Secretary Secretariat
Chhattisgarh
10. State of Himachal Pradesh
Through the Chief Secretary
Secretariat Shimla (H.P)
11. State of Jammu & Kashmir
Through the Chief Secretary
Secretariat
Srinagar (J & K)
12. State of Jharkhand
Through the Chief Secretary
Secretariat
Ranchi (Jharkhand)
13. State of Karnataka
Through the Chief Secretary
Secretariat
Bangalore (Karnataka)
14. State of Kerala
Through its Chief Secretary
Secretariat
Thiruvananthapuram (Kerala)
15. The State of Madhya Pradesh
Through the Chief Secretary

Secretariat
Bhopal (M.P)

16. State of Maharashtra
Through the Chief Secretary
Secretariat
Mumbai (Maharashtra)
17. State of Manipur
Through the Chief Secretary
Secretariat
Imphal (Manipur)
18. State of Meghalaya
Through the Chief Secretary
Secretariat
Shilong (Meghalaya)
19. State of Mizoram
Through the Chief Secretary
Secretariat
Aizwal (Mizoram)
20. State of Nagaland
Through the Chief Secretary
Secretariat
Kohima (Nagaland)
21. State of Orissa
Through the Chief Secretary
Secretariat
Bhubneshwar(Orissa)
22. State of Punjab
Through the Chief Secretary
Secretariat
Chandigarh, Punjab
23. State of Rajasthan
Through the Chief Secretary
Secretariat
Jaipur (Rajasthan)
24. 4State of Sikkim

Through the Chief Secretary
Secretariat
Gangtok (Sikkim)

25. State of Tamil Nadu
Through the Chief Secretary
Secretariat
Chennai (Tamil Nadu)
 26. State of Tripura
Through the Chief Secretary
Secretariat
Agartala (Tripura)
 27. State of Uttarakhand
Through the Chief Secretary
Secretariat
Dehradun (Uttarakhand)
 28. State of Uttar Pradesh
Through the Chief Secretary
Secretariat
Lucknow (U.P.)
 29. State of West Bengal
Through the Chief Secretary
Secretariat
Kolkata (West Bengal)
 30. State of Telangana
Through the Chief Secretary
Secretariat
Hyderabad
 31. Union Territory of Chandigarh
Through the Home Secretary
U.T. (4th Floor) Secretariat, Sector-9, Chandigarh
 32. Election Commission of India
 33. Ministry of Information and Broadcasting
- ...RESPONDENTS

AND IN THE MATTER OF:-

PETITION UNDER ARTICLE 32 OF
THE CONSTITUTION OF INDIA FOR
ISSUANCE OF AN APPROPRIATE
WRIT/ORDER OR DIRECTION TO
THE RESPONDENTS.

TO

THE HON'BLE CHIEF JUSTICE OF INDIA AND
HIS HON'BLE COMPANION JUSTICES OF THE
HON'BLE SUPREME COURT OF INDIA.

THE HUMBLE PETITION OF
THE PETITIONER ABOVE
NAMED

MOST RESPECTFULLY SHOWETH:-

1. That the Petitioner is filing the present Public Interest Litigation as a concerned citizen over the loss of precious lives and damage to the public property across the country especially in cities of Delhi, Ahmedabad and states of Uttar Pradesh, Madhya Pradesh, Haryana, Rajasthan, Gujarat, Assam and other parts of our country. The Citizenship Amendment Bill was passed by both the houses of Parliament in the month of December, 2019 dated

10.12.2019 and 11.12.2019 respectively. After the enactment for the said bill was introduced the political persons belonging to various political parties across India started misguiding and spreading false rumors and hereby creating a sense of terror and concern in the minds of community belonging to Muslim people across the country. The political persons belonging to various political parties hatched a conspiracy against the government which has passed an Act named Citizenship Amendment Act, 2019 concerning the minorities in countries like Afghanistan, Bangladesh, Pakistan etc. The political persons with a vendetta against the government and its progressive approach have created an environment of hatred, fear, violence in various parts of the country for their vested political interest as a result of which around 50 precious lives have been lost in various parts of the country and public property worth hundreds of crores has been

destroyed. The negative environment of fear and violence has resulted not only in the loss of lives, damage to public property but also has caused huge economic loss across the country and has also bought a bad name to our country **which a gross violation of Article 111 of the Constitution of India** .

2. The petitioner has no personal interest in the present public interest litigation. The present writ petition is not guided by self-gain. But is in the interest of general citizens of our country and innocent persecuted minorities belonging to Afghanistan, Pakistan and Bangladesh. That the present petition under Article 32 of the Constitution of India is being filed by way of public interest litigation and the petitioner has no personal interest as far as any personal benefits are concerned.
3. That the petitioner declares that the facts pleaded in the petition have been verified by her personally and the same are based upon the documentary proofs obtained by the

petitioner from the various news paper articles published in the online internet. The petitioner has not approached to any authority with respect to the present issue.

4. That the petitioner is a highly spirited and law abiding citizen of the country.
5. That the petitioner is the citizen of India and a
6. That the Petitioner has no personal interest in the Public Interest Litigation but being citizen of India she has full faith in the Institution.
7. That the present petition has no legal nexus with any civil, criminal or revenue litigation. The Petitioner has not filed any civil, criminal or revenue matter on his behalf which may have any nexus with the PIL.

8. That there is no alternative or equally efficacious remedy left in the hands of the Petitioner under the above mentioned compelling circumstances, but to move before this Hon'ble Court.
9. That the petitioner is not a way fairer nor an interloper but a sensitive and sincere citizen of this country who takes keen interest in the safety of citizens of this country.
10. That on 10.12.2019 & 11.12.2019 the Citizenship Amendment Act, 2019 was comprehensively discussed and voted positively in Lok Sabha and Rajya Sabha of our country.
11. That on 12.12.2019 the Citizenship Amendment Act, 2019 received the consent of the President of India and was published for general information and the said amendment to the Act came into force across India except few tribal areas of states of Assam, Meghalaya, Mizoram and Tripura. A copy of Citizenship Amendment Act dated 12.12.2019

passed by both the houses of the Parliament is annexed herewith and marked as **ANNEXURE P-1 (Pages __ to __)**.

12. That on 13.12.2019, a news article appeared in a leading news magazine India Today titled "Politicizing Asylum-Citizenship Amendment Bill". In the said article without properly reading the news magazine wrote an extensive article which not only misinformed the exact scenario of citizenship amendment act but the article itself was provoking and false information across the country has not only been spread by politicians but also by various media houses who are hell bent to destroy the peace of country. It is must to not only stop these anti India campaigners but a strict should be taken against all those who spread false rumors and destabilize our nation and cause disturbance in its peace. A copy of news article appeared in a leading news magazine India Today dated 13.12.2019 is

annexed herewith and marked as **ANNEXURE P-2 (Pages to)**.

13. That on 13.12.2019 a news article appeared in a leading newspaper India Today with a news that "Two minor boys killed in police firing during a protest in Guwahati". In the said news it was mentioned that more than 50 protestors were injured and 2 minor boys were killed in police firing in a protest against Citizenship Amendment Act, 2019 in Guwahati, Assam. A copy of the news article dated 13.12.2019 published in India Today is annexed herewith and marked as **ANNEXURE P-3 (Pages to)**.

14. That on 15.12.2019 a news article appeared in a leading News Daily Business Standard titled "Three Killed in protest firing as CAB protest flare across the North East". In the said news article it was stated that several parts of the North East India continued to burn for a second day as people defied curfew to protest against Citizenship Amendment Bill,

2019, it was also mentioned in the news that the protest was done by all Assam's Students Union and peasants organizations KMSS. In the said article the loss of property, disconnection of internet and many other important facts about full blown violence were mentioned. A copy of the news Article dated 15.12.2019 published in News Daily Business Standard is annexed herewith and marked as **ANNEXURE P-4**.

15. That on 15.12.2019 a news article appeared in a leading news daily BBC news titled "Citizenship Act: Unrest erupts in Delhi". In the said article it was mentioned that violence happened in various parts of Delhi as a result of protest against an Anti-Muslim law. It was also mentioned in the Article that the countries like UK, US and Canada have issued advisories to their citizens while travelling North East India. The news article itself gave a wrong information by writing that the law was so divisive. The violence in the city of Delhi,

damage to properties was also mentioned in the said article. A copy of the news Article dated 15.12.2019 published in News Daily BBC is annexed herewith and marked as **ANNEXURE P-5**.

16. That on 15.12.2019 a news article appeared in a leading news channel and daily Reuters titled "Dozens injured as activists clash in Citizenship Law Protest". The said article stated that hundreds of activists protesting against a new Indian Citizenship Law were injured in New Delhi after a clash with police in a University named Jamia Millia Islamia University in South East Delhi. The said news article also mentioned that buses were burnt in the protest, police used batons to disperse the students protesting against the new law. The said article also mentioned that the protests has raged particularly in some North Eastern States such as Assam, Tripura, West Bengal etc. A copy of the news Article dated 15.12.2019 published in News Daily Reuters is

annexed herewith and marked as **ANNEXURE**

P-6.

17. That on 16.12.2019 a news article appeared on a leading newspaper Business Standard titled "Give Citizenship Act a chance, Amit Shah appeals to students". The said article mentioned that thousands of people were protesting at Jantar Mantar and Assam Bhawan to call an end to religious profiling. The said article also mentioned that the Prime Minister of India called the violent protest against the Citizenship Amendment Act as deeply distressing. The said article mentioned about the statement and appeal of the Home Minister of India for the students to give Citizenship Act a chance. A copy of the news Article dated 16.12.2019 published in News Daily Business Standard is annexed herewith and marked as **ANNEXURE P-7.**

18. That on 19.12.2019 a news article appeared on a leading newspaper Business Standard titled "Citizenship Act protest highlights:

Internet suspended in many parts of UP". In the said article it was mentioned that thousands of students, activists and opposition leaders hit the streets in the national capital defying heavy security, clamp down and prohibitory orders. In the said article it was also mentioned that the mobile internet services were suspended in various parts of Uttar Pradesh and Karnataka after two persons were killed in police firing in Mangaluru. The said article also mentioned about the violence in city of Ahmedabad. A copy of the news Article dated 16.12.2019 published in News Daily Business Standard is annexed herewith and marked as **ANNEXURE P-8.**

19. That on 20.12.2019 a news article was published in a leading newspaper The Indian Express titled "Citizenship Act protest live updates: two dead in Mangaluru, One in Lucknow as protest turn violent". In the said article it was mentioned that at least two

people were killed in Mangaluru and one in Lucknow as the Anti Citizenship Law protestors clashed with the police on Thursday. In the said article it was also mentioned that 20 police personnel were injured in Mangaluru. In the said article other details regarding violence, injury to protestors and police and action taken by government was mentioned. A copy of the news Article dated 20.12.2019 published in The Indian Express is annexed herewith and marked as **ANNEXURE P-9** (Pages __ to __).

20. That on 20.12.2019 a news article was published in a leading newspaper Business Today titled "CAA Protest Live: Car torched near Delhi Gate; police uses force to disperse protestors. In the said article it was reported that violent protest rocked several cities in Uttar Pradesh after clash between protestors and police in Gorakhpur, Ferozabad and Bahraich. It was also said in the article that the protest against Citizenship Amendment

Act has escalated across the country. A copy of the news Article dated 20.12.2019 published in newspaper Business Today is annexed herewith and marked as **ANNEXURE P-10.**

21. That on 21.12.2019, a news article appeared in a leading newspaper The Hindu titled "Puducherry Chief Minister slammed for opposing Citizenship Amendment Act". In the said article it was mentioned that the Chief Minister was criticized by the opposition for a statement on Citizenship amendment act. In the said article it was said Chief Minister should prove his humaneness by according reservation to 50,000 migrants scheduled caste people residing in Puducherry without any social security benefits for last 54 years. It was also stated in the article that the CM has violated the oath of office as a result of a statement it is sad that a person of a status of a Chief Minister is openly creating an environment of confusion and rebellion by his

statement against the citizenship Amendment Act. The Chief Minister not only broke the law but also broke the code of conduct of his office. Besides CM Puducherry there are many politicians across the country who are creating a sense of fear and uncertainty in the minds of Muslim brothers and sisters, people belonging to scheduled caste and schedule tribes. Some of these politicians are out of power and jobless and are taking out their frustration by creating disturbance in the country and it is only Hon'ble Supreme Court of India which can stop these rogue elements from destroying our country. A copy of news article appeared in a leading newspaper The Hindu dated 21.12.2019 is annexed herewith and marked as **ANNEXURE P-11 (Pages to)**.

22. That on 21.12.2019 a news article appeared in a leading news daily India Today titled "Anti CAA Protest: 8 die as violence grips India; women, children detained in Delhi. In the said

article violence across the city of Delhi was reported and it was also mentioned that 8 people have died across the country against the Citizenship Amendment Act. In the said news article reports of violence across India was mentioned. A copy of the news Article dated 21.12.2019 published in India Today is annexed herewith and marked as **ANNEXURE P-12 (Pages to)**.

23. That on 21.12.2019 a news article published in a leading news daily Japan Today titled "Six dead in deadliest day of Indian Citizenship law protests". In the said article it was mentioned that six people and dozens were injured in protest against Citizenship Amendment Act on Friday itself in India. The said article in detail explained the violence across the country by protestors protesting against Citizenship Amendment Act. A copy of the news Article dated 21.12.2019 published in News Daily Japan Today is annexed herewith and marked as **ANNEXURE P-13**.

24. That on 21.12.2019, a news article appeared in a leading newspaper The Hindu titled "Puducherry Chief Minister slammed for opposing Citizenship Amendment Act". In the said article it was mentioned that the Chief Minister was criticized by the opposition for a statement on Citizenship amendment act. In the said article it was said Chief Minister should prove his humaneness by according reservation to 50,000 migrants scheduled caste people residing in Puducherry without any social security benefits for last 54 years. It was also stated in the article that the CM has violated the oath of office as a result of a statement it is sad that a person of a status of a Chief Minister is openly creating an environment of confusion and rebellion by his statement against the citizenship Amendment Act. The Chief Minister not only broke the law but also broke the code of conduct of his office. Besides CM Puducherry there are many politicians across the country who are creating

a sense of fear and uncertainty in the minds of Muslim brothers and sisters, people belonging to scheduled caste and schedule tribes. Some of these politicians are out of power and jobless and are taking out their frustration by creating disturbance in the country and it is only Hon'ble Supreme Court of India which can stop these rogue elements from destroying our country. A copy of news article appeared in a leading newspaper The Hindu dated 21.12.2019 is annexed herewith and marked as **ANNEXURE P-14**.

25. In all the above mentioned articles, it can be clearly seen that the innocent citizens of this country are being misguided to do violence, damage property and create unrest in the country by the political parties out of power having vendetta against the country as well as against the Central Government of India. The new Citizenship Amendment Act, 2019 clearly and vocally speaks about the minorities of Afghanistan, Pakistan, Bangladesh who are

being brutalized, killed, converted by the majority community of those countries. The Act gives protection to minorities of these three countries which include Hindus, Sikhs, Buddhist, Jain, Parsi & Christian community. It is the prime duty of our country to save these minority communities of Afghanistan, Pakistan, Bangladesh from being brutalized, killed, converted, raped by the majority community of these countries. With an aim to save the above mentioned innocent minorities, the citizenship amendment Act has been passed.

26. That it is difficult to understand as to how the Muslim community of our country India shall be affected negatively by way of this amendment. There is a continuous conspiracy by few political parties to create unrest in the country by putting fear in the minds of Muslim brothers and sisters of India that they shall be thrown out from the country by the Government using new Citizenship

Amendment Act. The false rumors and fear has resulted in serious violence, deaths of innocent people, destruction of public property, loss of business and has brought ignominy to our country which is only because of wrong interpretation of new Citizenship Amendment Act.

27. It is stated that till now the false rumors and fear caused by the vendetta politics has resulted into the loss of more than 50 lives, destruction of property worth hundreds of crores across the country and if not stopped full blown civil war and communal riots will happen in the country and thousands of life shall be lost in the process and irreparable loss will happen to the economy and image of this country. Hence the Present Writ Petition.

Therefore, at this stage the interference of this Hon'ble Court is necessary in the interest of general Public. Hence the present Writ Petition for kind consideration of this Hon'ble Court on the following amongst other:

GROUNDS

- A. Because in all the above mentioned articles, it can be clearly seen that the innocent citizens of this country are being misguided to do violence, damage property and create unrest in the country by the political parties out of power having vendetta against the country as well as against the Central Government of India.

- B. Because the new Citizenship Amendment Act, 2019 clearly and vocally speaks about the minorities of Afghanistan, Pakistan, Bangladesh who are being brutalized, killed, converted by the majority community of those countries. The Act gives protection to minorities of these three countries which include Hindus, Sikhs, Buddhist, Jain, Parsi & Christian community.

- C. Because it is the prime duty of our country to save these minority communities of Afghanistan, Pakistan, Bangladesh from being

brutalized, killed, converted, raped by the majority community of these countries. With an aim to save the above mentioned innocent minorities, the citizenship amendment Act has been passed.

- D. Because it is difficult to understand as to how the Muslim community of our country India shall be effected negatively by way of this amendment. There is a continuous conspiracy by few political parties to create unrest in the country by putting fear in the minds of Muslim brothers and sisters of India that they shall be thrown out from the country by the Government using new Citizenship Amendment Act.
- E. Because the false rumors and fear has resulted in serious violence, deaths of innocent people, destruction of public property, loss of business and has brought ignominy to our country which is only because of wrong interpretation of new Citizenship Amendment Act.

- F. Because till now the false rumors and fear caused by the vendetta politics has resulted into the loss of more than 50 lives, destruction of property worth hundreds of crores across the country and if not stopped full blown civil war and communal riots will happen in the country and thousands of life shall be lost in the process and irreparable loss will happen to the economy and image of this country.
- G. Because the new Citizenship Amendment Act, 2019 saves the persecuted minorities of Hindus, Sikhs, Parsi, Jain, Buddhists, Christians as these minorities are being continuously brutalized, harassed, humiliated, killed by Muslim majority population of Bangladesh, Pakistan & Afghanistan. An act brought to save innocent minorities in no way can be termed as unconstitutional and implementation of the said Act with force across the country is the need of hour.
- H. Because the minorities covered in new Citizenship Amendment Act, 2019 have no

other place whatsoever, to go so as to save themselves from rapes, brutalization, harassment, humiliation, illegal and forced marriages, forth conversion into Islam.

- I. Because the Anti-India stand takers want Muslim Community to be added in the said act which is surprising as it is from the majority of Muslim Community of Pakistan, Bangladesh and Afghanistan these minorities are being saved and bringing Muslims from Pakistan, Bangladesh and Afghanistan will add to more chaos and destruction in our country.
- J. Because the Petitioner is filing the present Public Interest Litigation as a concerned citizen over the loss of precious lives and damage to the public property across the country especially in cities of Delhi, Ahmedabad and states of Uttar Pradesh, Madhya Pradesh, Haryana, Rajasthan, Gujarat, Assam and other parts of our country.

- K. Because the Citizenship Amendment Bill was passed by both the houses of Parliament in the month of December, 2019 dated 10.12.2019 and 11.12.2019 respectively and was also approved by the President of India and the same is legal and constitutional.
- L. Because it is only the Hon'ble Supreme Court of India which can clarify the confusion and fear which is being created by the Anti-India Political Parties as the citizens of this country value the orders, views, judgments passed by this Hon'ble Court and intervention in the present issue is must seeing the volatile circumstances present in the country today.
- M. Because this Hon'ble Supreme Court of India has already issued notice in the petitions where the Citizenship Amendment Act is being called unconstitutional, thus petition seeking direction for Citizenship Amendment Act to be declared as constitutional is must to be heard and taken cognizance of by this Hon'ble Court in the interest of justice.

- N. Because after the enactment for the said bill was introduced the political persons belonging to various out of power political parties across India started misguiding and spreading false rumors and hereby creating a sense of terror and concern in the minds of community belonging to Muslim people across the country.
- O. Because the political persons belonging to various out of power political parties have hatched a conspiracy against the government who has passed an Act named Citizenship Amendment Act, 2019 concerning the minorities in countries like Afghanistan, Bangladesh, Pakistan.
- P. Because the political persons with a vendetta against the government and its progressive approach have created an environment of hatred, fear, violence in various parts of the country for their vested political interest as a result of which around 50 precious lives have been lost in various parts of the country and

public property worth hundreds of crores has been destroyed. The negative environment of fear and violence has resulted not only in the loss of lives, damage to public property but also has caused huge economic loss across the country and has also bought a bad name to our country.

Q. Because on 12.12.2019, the Government of India introduced an amendment to the Citizenship Act, 1955 by way of an amendment on 12.12.2019 and soon after the Act was passed various political parties which are against the Central Government after hatching a conspiracy started creating an environment of fear, uncertainty, violence, hatred across the country. The Political parties against the Central Government have spread false rumors across the country regarding the Muslim brothers and sisters of our country that they will be thrown out from the country hereby creating an environment of fear and restlessness as a result of which violence has

spread across the country in which more than 50 people have lost their lives and property worth hundreds of crores has been damaged and business worth thousand crores has taken a hit in the various parts of country in past few days.

- R. Because the incidents of false rumors and fear was spread first from the city of Delhi where the ruling party of Delhi through its MLAs created an environment of fear, false rumors, violence in various parts of city of Delhi. The other political party leaders having vendetta against the Central Government provoked the students of Jamia Millia Islamia University to create disturbance in the city of Delhi as a result of which parts of South Delhi including Jamia Nagar, New Friends Colony, Okhla and other parts of South East Delhi were disturbed because of full blown fight between police and students.
- S. Because be it abusing the Hon'ble Supreme Court Judges after Yakub Memon's hanging or

hanging of Afzal Guru by part of the students of Jamia Millia Islamia University and Jawahar Lal Nehru University to full blown fight with police after Citizenship Amendment Act was passed, Anti-India stand has become fashion of many students belonging to these institutions who otherwise are famous for the achievement of their legendry students. The students of Jamia Millia Islamia University were provoked to an extent by various political parties that the city of Delhi came to an halt for two days after a full blown fight happened between the students and police officials in which lot of students and police officials were injured and property worth crores was destroyed in the violence. It is must that such Anti-India activities which promote violence, hatred, destruction of properties, loss of precious lives needs to be immediately restricted and checked by the intervention of this Hon'ble Court.

T. Because the vendetta against the country and Central Government has not stopped till the limits of Delhi but various political parties who are not in power and are jobless have started a full blown violent situation in various parts of the country including states like Assam, Haryana, Maharashtra, Telangana, Uttar Pradesh, Delhi and other parts of the country. The Act of violence has been provoked by various out of power political parties across the country just for their vested interest to destabilize the stable government and peace and harmony of our country. The vested interest of out of power political parties has been blinded them to such an extent that the innocent citizens of our country are being provoked to adopt violence and destroy peace and harmony of our country. The minority community of Muslim brothers and sisters are being misguided to do violence against the state by creating a fear in their minds that they shall be thrown out of the country by the

Central Government using the Citizenship Amendment Act, 2019.

- U. Because the matter of fact is that the Citizenship Amendment Act, 2019 has nothing to do with the Muslim brothers and sisters of our country who are born here or have become citizens of this country by legal means. The Citizenship Amendment Act, 2019 concerns the minority persons like Hindus, Sikhs, Jain, Buddhists, Parsi or Christian community belonging to the countries of Afghanistan, Bangladesh, Pakistan. The Citizenship Amendment Act, 2019 has been passed with an aim to help and secure the lives of abovementioned minorities in countries like Pakistan, Bangladesh, Afghanistan as in those countries Muslims are in majority and the minorities are being killed, raped, troubled, converted to Islam in these Muslim dominated countries. The aim of Central Government to pass the present amendment in Citizenship Act, 2019 is to help

the minorities which are being brutalized in Afghanistan, Bangladesh, Pakistan. The present Citizenship Amendment Act, 2019 has nothing to do with the Muslim citizens of India but the out of power political parties are creating and spreading false news, rumors regarding the Citizenship Amendment Act, 2019 to such an extent that in the past few days various parts of our country have witnessed violence and destruction to such an extent that more than 50 lives have been lost and property worth hundreds of crores has been destroyed and if not stopped the whole country will burn due to civil war which will happen as a result of vendetta politics and misguidance.

- V. Because the clarification regarding the constitutionality of the new Citizenship Amendment Act, 2019 needs to be informed specifically to the general public of our country so that the Anti-India campaigners do not

succeed in burning our country and destroying the peace of our country.

W. Because it is only the Supreme Court of India which can help in clarification of the present situation and it is only the Apex Court of our nation which will be heard by the confused citizens of this country who are being misguided and are being scared by the Anti-India campaigners who have connived with the out of power political parties to destroy peace and harmony of this country.

28. That the Petitioner has not filed any similar petition before any High Court or this Hon'ble Court for the same relief except the present Writ Petition.

PRAYER

In the facts and circumstances of the case it is therefore most respectfully prayed that this Hon'ble court may be pleased to:-

a) Issue an appropriate writ or order declaring the Citizenship Amendment Act No.47 of 2019

as constitutional in accordance to Constitution of India;

- b) Issue an appropriate writ or order or direction directing the Respondent No.1 to Respondent No.____ to implement the Citizenship Amendment Act no. 47 of 2019 in their respective states aggressively;
- c) *Issue an appropriate writ or order or direction directing the Respondent No.1 to publicize extensively through newspapers, electronic media and other means of advertisement regarding the Citizenship Amendment Act, 2019 and clarify that it is not against the spirit of constitution of India and in no sense against any citizen of India;*
- d) Issue an appropriate writ or order directing the Respondent Election Commission of India to identify and take strict action against the political parties spreading false rumors and violence in the country;
- e) *Issue an appropriate writ or order directing the Respondent Ministry of Information &*

Broadcasting to take strict legal action against those newspaper and media houses who are spreading false information and rumors;

- f) *Issue an appropriate writ or order directing the Respondents to publicize extensively with a wide reach by way of hoardings and free booklets in Hindi, English and Regional Languages to make the public understand that Citizenship Amendment Act is relevant only for Hindu, Sikh, Jain, Buddhist, Parsi and Christian foreigners, who have migrated from Pakistan, Bangladesh, and Afghanistan into India up to 31.12.2014, on account of persecution faced by them due to their religion;*
- g) *Issue an appropriate writ or order directing the Respondents to take stern legal action against those disturbing the peace and harmony;*
- h) *Pass any such other further order or orders as this Hon'ble Court may deem fit and proper in the circumstances of the case;*

And

FOR THIS ACT OF KINDNESS THE PETITIONER AS
IN DUTY BOUND SHALL EVER PRAY.

DRAWN BY:
VINEET DHANDA
ADVOCATE

Filed by

Drawn on:

Filed on:

[DR. J.P.DHANDA]
Advocate for the petitioner

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) NO. OF 2019

IN THE MATTER OF:

Puneet DhandaPetitioner

VERSUS

Union of India &Ors.Respondents

[PAPER BOOK]

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DR. J.P.DHANDA
ADVOCATE FOR THE PETITIONER

IN THE SUPREME COURT OF INDIA

CIVIL ORIGINAL JURISDICTION

WRIT PETITION (C) NO. OF 2019

IN THE MATTER OF:

Puneet Kaur Dhanda

.....Petitioner

VERSUS

Union of India &Ors.

.....Respondents

AFFIDAVIT

do hereby solemnly affirm and
declare as under:

1. That I am the Petitioner in the abovementioned matter and I am fully conversant with the facts and circumstances of the matter and as such I am competent to swear the present affidavit.
2. I have instructed the drafting of the petition. That the accompanying Writ Petition (Pages ____ to ____), List of dates and events (Pages ____ to ____) and application(s) have been drafted by the counsel on my instructions. The contents of the same have been read over and explained to me in my language and the same are true and correct to the best of my knowledge and no part of it is false and nothing material has been concealed there from.
3. That the petitioner stated that there is no personal gain, private motive or oblique reason in filing the Public Interest litigation.
4. That all the annexures to the accompanying Public Interest Litigation are true copies.

DEPONENT

VERIFICATION:

Verified a _____ n thisday of December 2019, that the contents of the above affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.

DEPONENT

PROFORMA FOR FIRST LISTING

SECTION:

PIL

The case pertains to : (Please tick/check the correct box)

- | | | |
|-------------------------------------|---|-----------------------|
| Central Act | : | Constitution of India |
| Section | : | 32 |
| Central Rule | : | N/A |
| Rule No(s) | : | N/A |
| State Act | : | N/A |
| Section | : | N/A |
| State Rule | : | N/A |
| Rule No(s) | : | N/A |
| Impugned Interim Order | : | N/A |
| Impugned Final Order/Decree | : | N/A |
| High Court | : | N/A |
| Name of Judges | : | N/A |
| Tribunal/Authority | : | N/A |
| 1. Nature of matter | | Civil |
| 2. (a) Petitioner/appellant No.1 | : | Puneet Kaur Dhanda |
| (b) e-mail ID | : | N/A |
| (c) Mobile phone number | : | N/A |
| 3. (a) Respondent No.1 | : | Union of India &Ors. |
| (b) e-mail ID | : | N/A |
| (c) Mobile phone number | : | N/A |
| 4. (a) Main category classification | : | 08 |
| (b) Sub classification | : | 817 |
| 5. Not to be listed before | : | N/A |

6. a) Similar/disposed of matter with citation; if any & case details : No similar dispose matter
b) Similar pending matter with citation. : No similar matter is pending
7. Criminal Matters : N/A
- (a) Whether accused/convict has surrendered : Yes No
- (b) FIR No. N/A Date: N/A
- (c) Police Station : N/A
- (d) Sentence Awarded : N.A.
- (e) Period of Sentence : N.A.
Undergone including period of detention/custody undergone.
8. Land Acquisition Matters : N/A
- (a) Date of Section 4 notification : N/A
- (b) Date of Section 6 notification : N/A
- (c) Date of Section 17 notification : N/A
9. Tax Matters : N/A
10. Special Category (first petitioner/appellant only): N/A
- Senior citizen > 65 years : SC/ST : Woman/child
Disabled : Legal Aid case : In Custody
11. Vehicle Number (in case of Motor Accident Claim Matters): N/A
12. Decided case with citation : N/A

Date:

AOR for petitioner (s)/appellant(s)
Dr. J.P. DHANDA
Registration: No.: 1119
Email id: jpdhanda7@gmail.com