

Date: 31.12.2019

To,

IG Navin Kumar Singh, IPS
Jharkhand Police Headquarter,
Dhurwa, Ranchi-834004
Jharkhand

Subject: **Legal Notice**

Sir,

Under instructions from my client Sh. Rahul Solanki, S/o Sh. Brahamjeet Singh R/o 1052/2 Sanjay Enclave, Faridabad, Haryana-121005 working as Assistant Commandant 222 BN, CRPF, hereinafter referred to as my client, I am serving you with the following notice in unequivocal terms:-

1. That my client's company (Golf/222 CRPF) was deployed in Jharkhand Assembly Election 2019 and was part of Ad-hoc 304 BN of CRPF , which was specifically formed for Jharkhand Assembly Election.
2. In First two Phases his Company (Golf/222) was deployed in Madhyamik Vidyalaya Khukhukalah under PS Naudiha Bazar , Palamu and Tonto Police Camp , Chaibasa , respectively

3. That on 08/12/2019 after second phase of election, for operational requirements, his company (Golf/222) took brief night halt at KHELGAON SPORTS COMPLEX, RANCHI.
4. That During Election Duty, the prime responsibility of making administrative and logistic arrangements for CAPFs is of State civil authorities and State Police but the administrative and logistic arrangements done by Ranchi Police & civil administration were highly pathetic and deplorable. The Jawans, due to lack of basic facilities, had to do open defecation. For drinking and cooking, water was given to the Jawans through water-canon. Further, water provided to the Jawans had a foul smell and was reddish in colour. Since, the Jawans were highly tired and hungry and they had no other option, but to use that dirty water provided for drinking and cooking.
5. That on 09/12/2019, during Morning Marker Parade his company (Golf/222) Jawans complained him that they were given "Animal Like Treatment" by civil authorities. There was no arrangement for drinking & cooking water and other basic necessities. That knowingly civil authorities affected "the dignity and honour" of the Jawans.
6. That it is very important to note that on the same day at around 6:00 AM a fratricide incident happened in the same complex in which a Company Commander and a Constable of 4th BN of Chhattisgarh Armed Force got killed.

7. That as the commanding officer, it was my client's duty to pacify his Jawans and to inform the higher authorities about the ill treatment meted out to his Jawans.
8. That my client projected the grievances of his Jawans to the higher authorities.
9. That on 10/12/2019, my client's duty was changed and he was directed to report back at unit Head-Quarter (Bijapur, Chhattisgarh) with immediate effect after handing over the charge to an Inspector rank subordinate officer.
10. That on 11/12/2019, a news report was published at online news portal with headline ***“crpf-officer-complaining-of-chaos-was-removed-from-election-duty”***.
11. That you the Noticee had concealed the true facts and reality of the incident that happened on 08/12/2019 and without investigating into the matter gave false report to media houses. You had disclosed my client's personal information while he was on duty. You defamed my client by giving false report of the incident. You had also jeopardized the security of 80 CRPF Jawans by disclosing their Commander's details.
12. That information given by you to the media houses was false, baseless and malicious and upon perusal of the various news

- Articles, the following glaring factual infirmities, inter alia , can be noticed:

1. You falsely represented the media about your investigation of incident dated 08/12/2019 which in fact was never conducted.
 2. You falsely represented that my client requested for hotel and left his Jawans in the middle.
 3. As a senior police officer, it is expected that you are aware of military's security doctrine that "targeting the Commander is equivalent to targeting the Troops". You jeopardized the security of 80 CRPF Jawans by disclosing their Commander's personal details like his Name, Hotel details including Room Number.
 4. The disclosure of these personal details was not only violate the right to privacy of an individual but also highly irrelevant with matter in issue. Your act shows the malicious intent of the addressee to malign the reputation of my client.
13. That by giving false report to the Election Commission and media houses you not only compromised the safety, security and reputation of CRPF troops but also attacked the core principles enshrined in Article 324 of Constitution of India i.e. mandate of the Election Commission of India of conducting free and fair Election. By giving false report to the Election

Commission you had attempted to subvert the free, fair and secure electoral process.

14. That due to your false report, CRPF had to change many Company Commanders at a very short notice which have immense financial and security implications.
15. That your false reporting caused huge financial loss (in lakhs) to the exchequer of Government of India which is ultimately the taxpayers money.
16. That from a perusal of the aforesaid facts, it is evident that a patently false and baseless information, which is divorced from true and correct facts, has been given by you the Noticee. My client has reasons to believe and apprehends that the said report has been published at your instruction to malign the image of my client. You were fully aware of the facts and yet you gave false information to the media which has adversely affected my client's image and goodwill amongst the member of society. The said news report seeks to portray and does in fact portray a false and incorrect impression about my client in the minds of the battalion, senior officers, family & relatives.
17. The publication of the said report article has caused an irreparable injury and loss of reputation to my client. Pursuant to the publication of the news report my client has been contacted by several persons, inquiring about the same. My client has been questioned on his promise and

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dedication towards his Job. He suffered immense harm to his goodwill, reputation and standing before his department, needless to mention immense mental torture caused by such rhetoric.

You the Noticee are hereby called upon to immediately tender an unconditional apology in writing to my client and also publish true and correct facts, upon failure of which my client will initiate appropriate proceedings for defamation, mental harassment, compromising the safety and security of CRPF Jawans, causing loss to government exchequer and giving false information to the Election Commission of India. Needless to mention that any such proceeding, if initiated, shall be solely at your risk, cost and consequences.

Due to your callous approach, and gross negligence committed by you the Noticee my client and his family had suffered irreparable loss of reputation and facing mental agony.

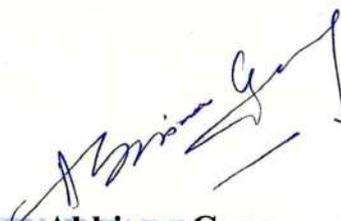
I therefore, by this Legal Notice call upon you the Noticee to make unconditional public apology and take back your false statement failing which, I have clear instructions from my client to initiate appropriate legal proceeding, civil as well as criminal, against you.

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A copy of this notice has been retained in my office for future reference and record.



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