

**BY COURIER / BY EMAIL**16<sup>th</sup> July, 2016

To,

1. Mr. Arnab Goswami  
President & Editor in Chief – TimesNow  
Times Global Broadcasting Co. Ltd.  
Trade House, 1<sup>st</sup> floor,  
Kamala Mills Compound  
Senapati Bapat Marg  
Lower Parel  
Mumbai – 400 013
2. Ms. Megha Prasad  
Bureau Chief – TimesNow  
Times Global Broadcasting Co. Ltd.  
Trade House, 1<sup>st</sup> floor,  
Kamala Mills Compound  
Senapati Bapat Marg  
Lower Parel  
Mumbai – 400 013
3. Mr. Avinash Kaul  
Chief Executive Officer – TimesNow  
Times Global Broadcasting Co. Ltd.  
Trade House, 1<sup>st</sup> floor,  
Kamala Mills Compound  
Senapati Bapat Marg  
Lower Parel  
Mumbai – 400 013
4. Mr. Sunil Lulla  
Chief Executive Officer – Times Global Broadcasting Co. Ltd.  
Trade House, 1<sup>st</sup> floor,  
Kamala Mills Compound  
Senapati Bapat Marg  
Lower Parel  
Mumbai – 400 013
5. Times Global Broadcasting Co. Ltd.  
Trade House, 1<sup>st</sup> floor,  
Kamala Mills Compound  
Senapati Bapat Marg  
Lower Parel  
Mumbai – 400 013

Sir/Madam,

Under instructions of my client Dr. Zakir Abdul Karim Naik, the President of Islamic Research Foundation having office at Zohra Manzil, 2 A/B, Ground Floor, 195/213 SVP Road, Dongri, Mumbai- 400009, I have to address this notice to each of you as under :-

1. You Addressee No. 1 are the President and Editor-in-Chief of news channel, Times Now, which is broadcasted on television having a wide coverage all over Mumbai, India and the world. You Addressee No.1 are also the Anchor of the show “The Newshour Debate” which is telecast live at “9 p.m. five days a week” on the TimesNow news channel. You Addressee No. 2 is the Bureau Chief of Times Now. You Addressee No. 3 is the Chief Executive Officer (CEO) of Times Now. You addressee No. 4 is the Chief Executive Officer (CEO) of Times Global Broadcasting Co. Ltd which owns the said TV channel, TimesNow and you Addressee No. 5 is the owner and employer of the TimesNow channel and its employees.

2. My client is a medical Doctor by profession who has completed his Bachelor of Medicine, Bachelor of Surgery (MBBS Graduation) from Mumbai in the year 1991. My client established the Islamic Research Foundation (IRF), a registered charitable public Trust in the year 1991 and is presently its President. Since last more than 20 years, beginning from the year 1993, my client has delivered over 2000 public talks all

over the world in countries, viz. U.S.A., Canada, England, Italy, France, Saudi Arabia, U.A.E., Kuwait, Qatar, Bahrain, Oman, Yemen, Egypt, Australia, New Zealand, South Africa, Botswana, Nigeria, Ghana, Gambia, Morocco, Algeria, Indonesia, Malaysia, Singapore, Brunenei, Thailand, Hong Kong, China, Japan, South Korea, Guyana, Trinidad, Mauritius, Sri Lanka, Maldives and many other countries, in addition to numerous public talks in India.

3. My client delivered his first international lecture on his tour to South Africa in the year 1994. My client is successfully participating in several symposia and dialogues with prominent personalities of various faiths which included historic public debate with Dr. William Campbell of U.S.A. on the topic “Quran and the Bible in the light of Science” which was held in Chicago, U.S.A., on 1<sup>st</sup> April, 2000. My client has also had inter-faith dialogue with prominent Hindu Guru Sri Sri Ravi Shankar on the topic “The Concept of God in Hinduism and Islam in the Light of Sacred Scriptures” which was held at the Palace Grounds, Bangalore, on 21<sup>st</sup> January, 2006. My client has been awarded the title “Deedat Plus” by the world famous orator on Islam and Comparative Religion Shaikh Ahmed Deedat who presented my client with a plaque in May, 2000 with the engraving “Awarded to Dr. Zakir Abdul Karim Naik for his achievement in the field of Da’wah and the study of Comparative Religion”. In the year 2001 my client started an Islamic International School. In the year 2009, my client was ranked No.82 in “List of 100 most Powerful Indians” published by the Indian Express Group.

Georgetown University, U.S.A., has listed my client in the top 70 list of the most influential Muslims in the world in “The Muslim 500” for the years 2011, 2012, 2013, 2014, 2015 and 2016. The Custodian of the Two Holy Mosques King Salman bin Abdul Aziz Al-Saud presented my client with the prestigious King Faisal International Prize 2015 for ‘Service to Islam’ in Riyadh on 1<sup>st</sup> March, 2015. My client states that above prize is the most prestigious prize in the Muslim world similar to Nobel Prize. In the year 2013 Shaikh Mohammed bin Rashid Al Maktoum, Vice President & Prime Minister of UAE and Ruler of Dubai, presented the prestigious Dubai International Holy Qur’an Award’s ‘Islamic Personality of 2013’ Award and Citation to my client on 29<sup>th</sup> July, 2013. In the year 2013 King of Malaysia The Agong, Tuanku Abdul Halim Mu’dzam Shah presented to my client the highest award of Malaysia, the ‘Tokoh Ma’al Hijrah Distinguished International Personality Award for the year 2013. Ruler of Sharjah, Shaikh Dr. Sultan bin Mohammed Al Qasimi conferred on my client the ‘Sharjah Award for Voluntary work’ for the year 2013 for my client’s voluntary service for Islam. The President of the Republic of The Gambia Dr. Yahya Jammeh, conferred on my client the highest National Award in The Gambia “The Insignia of the Commander of the National Order of the Republic of The Gambia”. My client was also awarded and presented with an Honorary Doctorate – ‘Doctor of Humane Letters’ (Honoris Causa) by the Vice Chancellor of the University of The Gambia. Upto the year 2016, my client has received more than 14 million likes on his Facebook page. My client regularly appears on the various

international TV channels in over 150 countries and is regularly invited for TV and Radio interviews. My client has also authored many books on Islam and Comparative Religion. My client regularly appears on Peace TV Network which has accumulated over 100 millions viewership. Peace TV is launched in various languages including English, Urdu, Bangla and even Chinese.

4. My client was therefore shocked and surprised to see the television shows being telecast live on TimesNow Channel under the caption “The Newshour Debate” on 6<sup>th</sup> July, 2016 on the subject “Zakir Naik Responsible for Dhaka Attacks should be STOPPED” and in the “The Newshour Debate” telecasted live on 7<sup>th</sup> July, 2016 on the subject “Zakir Naik will get away from Political Support” as well as your subsequent shows telecast thereafter wherein the following defamatory comments/statements have been made by You addressee No. 1 which damaged the reputation of my client. You have made absolutely false and damaging statements against my client which are per-se defamatory and made with a view to malign and bring disrepute to him.

5. The following false and defamatory statements are made in the aforesaid “The Newshour Debate” telecast live on TimesNow Channel on 6<sup>th</sup> July, 2016 :

***(i) “He is not a scholar, No, No, No...he is not a scholar, no, no one second, he is not a scholar, he is not a scholar. He is Mr. Money bags. He makes lots of money. He makes some lot of money spreading hate”.***

(ii) *“...He is not a scholar, he is a supporter of Osama Bin Laden, he used the medium of television to build the case for Osama Bin Laden...”*

(iii) *“.....Zakir Naik is so dangerous, he is so dangerous, because he uses the television media...”*

(iv) *“... He is using the garb of Quran to defend violence, the ISIS has carried out the attack in Dhaka and this man is defending Osama Bin Laden and building a case for them...”*

(v) *“...He is an agent of terror”...*

(vi) *“...This debate is for protecting India from venomous people like Zakir Naik”...*

(vii) *“... I cannot tolerate people who carry an Indian passport and have no loyalty to this country, to this country’s belief, to this country’s sovereignty and to this country’s secularism...”*

(viii) *“...Kafeel Ahmad responsible for the 2007 Glasgow Airport attack, the man who plotted the 2007 London bombings is inspired by Zakir Naik, Iqbal Bhatkal, Raahil Bhatkal of the Indian Mujahidden are inspired by Zakir Naik...”*

(ix) *“...Zakir Naik is the person inciting the people to carry out murder, acts of terrorism...”*

(x) *“Now he is really a rich man and the source of his wealth is the hate he spreads through the medium called TV...”*

(xi) *“I will tell you the things he says, why don’t you listen now? He is a man he says 9/11 is an inside job, Osama bin Laden is an innocent man, then he makes comments against Christians.”*

6. The following defamatory statements are made by you No. 1 in the aforesaid “The Newshour Debate” telecast live on Times Now on 7<sup>th</sup> July, 2016:

(i) *“You need a testimony of a terrorist to act against a man like Zakir Naik, he has used television to broadcast messages of hate, you want a terrorist to give an interview saying i was inspired by Zakir Naik to act against him? thats not even funny Tariq Fateh is into the debate....Tariq Fateh, tariw fateh!”*

(ii) *“ISIS flag are raised on routine basis in everyday, what is the guarantee that those people who raised the ISIS flags are not inspired by Zakir Naik.”*

(iii) *“...Zakir Naik is in support of Osama Bin Laden...”*

(iv) *“...Put him in jail if require because he is the trader of hate...”*

7. The following defamatory statements are made in the aforesaid “The Newshour Debate” telecast live on Times Now on 8<sup>th</sup> July, 2016:

(i) **“And the demand ban on Zakir Naik, ban on his activities, the ban on his financing, the ban on his channel, the ban on this so called organisation that he runs, the ban on his freedom in India is up for debate tonight..... This antinational fanatic called Zakir Naik? ”**

(ii) **“ Every Muslim should be a terrorist, those are the words tonight, and let me complete “Every Muslim should be a terrorist, the thing is if he is terrorising terrorist, he is following Islam” every Muslim should be a terrorist were his words”**

(iii) **“ I think people, these fanatics, these antinational elements like Zakir Naik they misuse Indian democracy, Indian Institutions, Indian generosity, Indian law, Indian sprit. Zakir Naik would not be allowed to operate in the United Kingdom, he is not allowed to enter the United Kingdom. In Australia he would have been thrown out, because the Australian Prime Minister advocated a red card system to ban hate preachers from entering the country, right. In France he would not be allowed to operate for a single day, because France banned four Islamic scholars from attending a conference in Paris on the grounds of public order. In Denmark this man would have been thrown out, persona grata view, because Denmark could contemplate drawing up a list of Islamic preachers who**

**propagate anti democratic ideas and even Malaysia which is a predominantly Muslim country, Atiqur Rahman even Malaysia did not allow Zakir Naik to give a talk there”.....the fact of the matter is in April this year Zakir Naik was prevent from giving a talk in Malaysia which is a predominantly Muslim country, because there was a fear he could hurt religious sensitivities.....”**

**(iv) “I am saying Ahmed Ayaz, that this man is an inspiration for terrorist, you want me to make it more clear, he is a global inspiration for terrorist.”**

**(v) “ He inspires terrorism.....you are mixing up Islam and terrorism.”**

**(vi) “.....I am not denigrating Islam, I think Zakir Naik is denigrating Islam. You should have the courage to say that on the television... Zakir Naik is denigrating Islam.”**

**(vii) “...You should say lock up this fellow, Zakir Naik is nothing, I am telling you today disown Zakir Naik , disown Zakir Naik, disown Zakir Naik, he is bringing a disgrace to your religion. He is using your religion.”**

**(viii) “ ... Today when I am saying, here is a man who us using a mix of television, big money, supporting terrorist to promote bigotry and divide our country as justice Markahande Katju says suddenly you say you are anti Muslims. What kind of logic is that? You should disown this man Zakir Naik.”**

**(ix)“..... is he an Islamic scholar? Is Zakir Naik an Islamic scholar? Answer my question?..... then by saying so and I say this to your face today you are making him a definitive authority on religion and legitimising his worked interpretation of the Qur’an, you are supporting people like him.”**

**(x)“...The time is up, this is not the time to entertain Zakir Naik, it is time to put him behind bars.....”**



8. The following defamatory statements are made in the aforesaid “The Newshour Debate” telecast live on Times Now on 12<sup>th</sup> July, 2016:

**(i) “...And my question to you sir is, I saw your statement and I was horrified on Zakir Naik, I mean you actually came out in the open and supported this terror inspirer, this terror preacher you came out in the open and did it I mean how low will you fall for a few Votes.....”**

**(ii) “And who is going to vote for you when you support someone inspired by Osama bin Laden? I saw you.. no no your talking on a time when 21 people in Kerala, 21 people in Kerala have gone missing and join the ISIS and two, who as per their parents use to visit Zakir Naik. At a time when you should be looking into where they are, why so many extremist are being inspired by Zakir Naik, I think personally that it is utterly shameful that you actually come out and defended him.”**

**(iii) ...” I am telling you that Zakir Naik is supporter of Osama bin Laden you tell me, you tell me why you are supporting Zakir Naik? You tell me why you are supporting Zakir Naik? He is inspiring people to join the ISIS, why are you supporting him.”**

**(iv) “..Yes he is, he is a supporter of terrorist; he is a supporter of terrorist.”**

**(v)...” who Zakir Naik jaise anti-national aadmi ke saath associate bhi hosakte hai, who race mai hai ek dusre ke saath, tasleem rehmani.”**

**(vi) ...” than Zakir Naik is, Zakir Naik is, Zakir Naik is...why are you supporting him? Why are you supporting a man who supports suicide bombings?...Are you for Osama Bin Laden? Are you for suicide bombing? Are you for inspiring people to**

**join the ISIS? What rubbish are you talking about, do you even realise..... You are giving a person, who is a terror supporter political credibility and I think saba is absolutely correct.”**

**(vii) “The same people inspired by Zakir Naik will come back to this country and attack people on our soil and you will be responsible Gaurav Bhatia for that terrorism, because you are providing the justification for that terrorism.”**

**(viii) “... of the heinous and regressive thoughts of Zakir Naik. He is against, what this country stands for and please Tasleem Rehmani desh ke bare mai sochiyeh I thank you all for joining on debate number one on the newshour tonight..”**

9. The following defamatory statements are made in the aforesaid “The Newshour Debate” telecast live on Times Now on 14<sup>th</sup> July, 2016:

**(i)“questioning in connection with the Aurangabad arms haul case?....there was no evidence found against him, but a certain Feroz Deshmukh who used to work in the Islamic Research Foundation was arrested for his role.....This is the same Feroz Ahmed, let me connect the dots who is out on bail, who allegedly made Abu Jundal, who went on to the play a role in the 26/11 attacks and where did the meeting happened? the meeting happened in the office of the Islamic Research Foundation, who runs the Islamic Research Foundation? is Zakir Naik, which means there was a meeting with 26/11 master mind in the Islamic Research Foundation office....”**

**(ii) “Why was the IRF office, why was the IRF office a meeting point for a Lashkar-e-Taibah operative like Abu Jundal?.....no I am not saying, I am very clear, the Mumbai police.. Why are you are getting hassle?.. I am not making allegation, I am saying simply, Vikram Singh can come into the debate.”**

**(iii) “I am repeating myself and I am saying it again, that Zakir Naik has reportedly said that suicide attacks... I am saying that he is an inspiration for terrorists... I am saying he derides other religions. I am saying he is a part of a network of Salafist preachers who have spread hatred... “**

**(iv) “Will you take responsibility today if there is an attack in India of the ISIS and that person says the like in Bangladesh we were inspired by Dr Zakir Naik? You know the problem with you is Mr. Pathan till the act of terrorism does not impact individuals you feel it would happen to.....you need t be realist about what’s happening in this country and you are only brain washed and you are brain washing people.**

**10.** The following defamatory statements are made in the aforesaid “The Newshour Debate” telecast live on Times Now on 15th July, 2016:

**i) “..This is the hate, This Salafi Wahabisim is what is destroying kasmiriyat and destroying Kashmir and creating trouble in Kashmir, we have to take on people like Zakir Naik we take them head on..”**

**(ii) “I would only say this . I don’t want an opportunist who makes money by inspiring terrorist to say that I represent Islam.”**

**iii) “The concept of Islamic supremacy is the same that ISIS speaks and Zakir Naik speaks, now Mr Bashir.”**

**11** My client states that the statements so pronounced and made by you are not only false but also make a scathing remark on my client’s character

thereby proving that the sole motive is to defame my client and to malign and lower his reputation in the eyes of general public.

- 12 Besides making the aforesaid false, defamatory and damaging insinuations against my client, you have deliberately and with malicious intention of defaming my client and creating enmity and hatred between religious communities, quoted and/ shown only a part of my client's speeches, that to totally out of context and also some of which were picked up from doctored speeches of my client which are available on You Tube/Internet.
- 13 My client states that your television news channel is carrying out a media trial influencing people at large as well as the investigating authorities who are reportedly carrying out a probe under the directions of the Maharashtra Government. My client has till date not received any notice from any such authority and/or from the Government with regard to the said probe.
- 14 My client states that without verifying facts and without having any positive and/or cogent evidence in support, you have recklessly and callously, with deliberate and malicious intention made and published on the television the aforesaid false, defamatory and damaging remarks against my client, which have severely harmed my client's impeccable reputation.

- 15 My client states that it was expected that as an organization of repute and being a wide broadcasted television news channel, you should have verified the correct facts from my client before embarking upon such unprofessional and irresponsible statements which is nothing but an attempt to intentionally defame my client. The statements made by you on television have damaged and tarnished my client's impeccable reputation and image in the eyes of the general public who are made to believe the false allegations carried out by you. My client further states that the damage to his reputation caused solely on account of your irresponsible statements has caused grave and irreparable damage to my client's image in the world which cannot be measured in terms of money.
- 16 My client states that it is you who is willfully without any authority carrying out a media trial and influencing the minds of the public and authority to the detriment of my client's interest and are malign statement without verifying records. The statements so made by you publically, is misleading and contain falsehood and half truths. You have intentionally maligned my client's reputation. You on your television channel have started a hate campaign against my client without having knowledge of the truth which you have deliberately hidden.
- 17 Kindly note that even 'The Daily Star' a newspaper in Bangladesh, whose story the Indian media had picked up and started a media trial

against my Client, has denied having stated that my Client had inspired any terrorist to kill innocent people and even corrected its report that my Client was banned by Malaysia. However, you have acted in the most reckless and malicious manner and have continued this defamatory tirade against him.

18 The above statements made by you have not only defamed and maligned my client but have also hurt his religious sentiments. You have deliberately and with malicious intention insulted and outraged my client's religious feelings. Moreover you have also hurt the religious sentiments of the Muslim community which reveres Dr. Naik and holds him in high esteem.

19 By making the aforesaid defamatory and inflammatory statements you are promoting disharmony and feelings of hatred, enmity and ill-will between different religious groups and thereby destroying the secular fabric of our country. Moreover your statements are prejudicial to the maintenance of peace and harmony between different religious communities and they undoubtedly disturb public tranquility.

20 You Addressee No.2 have, deliberately and with malicious common intention, also been making absolutely false and defamatory statements against my client on your TV channel TimesNow, inter-alia falsely portraying him to be supporting "a breed of toxic International preachers" besides aiding and abetting Addressee No. 1 by assisting him in his above programmes of News Hour.

21 You addressee Nos. 3, 4 & 5 being the CEO's of TimesNow and Times Global Broadcasting Co. Ltd and the owner and employer of Tv channel TimesNow, have deliberately and with malicious intention permitted Addressee Nos. 1 & 2 to telecast the above television programmes wherein my client has been defamed and the religious feelings of my client as well as the Muslim community were insulted and outraged. You addressee Nos. 3, 4 & 5 are therefore equally responsible and accountable for the aforesaid offensive and unlawful acts of Addressee Nos. 1 & 2 besides being personally liable for the same, having permitted them to commit the aforesaid illegal acts on your television channel. Each of you is thus jointly and severally liable for your aforesaid illegal acts which inter-alia constitute offences punishable u/s 153-A, 295-A and 500 r/w 34 of IPC. My client will undoubtedly initiate appropriate criminal proceedings against each of you for having committed the aforesaid offences.

22 My client states that various organizations have openly supported my client's work and maintained that he is being isolated and vilified and have condemned the act of media as they are conducting a media trial. The following organizations amongst others support my client:-

- (i) Indian Union Muslim League, (ii) Jamat Islami Hind, (iii) Jamiat e Ulama, (iv) Jamiatul Ulema, Mumbai (v) Mumbai Aman Committee, (vi) Jamiat Ahle Hadis, (vii) All India Milli Council, (viii) All India

Quraish Jamat, (ix) Khar Masjid Trust, (x) Movement for Human Welfare (MHW), (xi) Bharat Mukti Morcha, (xii) Awami Vikas Party Bharat Mukti Party, (xiii) Kokan Vikas Manch, (xiv) SDPI, (xv) Association for Protection of Civil Rights (APCR), (xvi) All India Samaji Rifahi Council, (xvii) Purvanchal Janhit Forum, (xviii) Iqra Education (xix) Alhira Education Foundation (xx) BAMCEF.

21. My client therefore states that your act of deliberately and intentionally making the aforesaid defamatory and damaging statements against my client on the television channel, clearly discloses your deliberate and malicious intention to defame my client. My client states that the statements made by you in your news channel as above clearly establish that you have intent to harm the reputation of my client and lower him in the estimation of others and to further malign his character and his impeccable reputation in the Society. My client calls upon you to forthwith furnish in writing your source of information and any credible evidence on the basis of which the aforesaid false and defamatory statements were made by you.

22. My client states that even after the above said dates, you on “The Newshour Debate” telecast live on TimesNow have continued to make false and defamatory statements against my client thereby



tarnishing and damaging my client's reputation in the eyes of the general public. Your vilification against my Client thus continues.

23. My client is not in a position to ascertain the actual monetary damages suffered by him for your wrongful action. However, my client for the present estimates that the damage suffered by him is estimated at an amount not less than Rs.500 crores.

24. In the circumstances, I am instructed by my client to call upon and require you, which I hereby do, to forthwith do the following :-

- a) furnish in writing your source of information and any evidence on the basis of which the aforesaid false and defamatory statements were made by you.
- b) withdraw the defamatory statements made by you in your programme "The Newshour Debate" telecast live on TimesNow.
- c) tender unconditional apology on your programme "The Newshour Debate" telecast live on TimesNow as well as on your website.
- d) to pay to my client or to me on his behalf as his Advocates a sum of Rs.500 crores as and by way of damages for the harm caused to my client's reputation and mental trauma and agony suffered by him which are attributable solely on account of your irresponsible and deliberate and intentional act of defaming and maligning my client;

25. You are further called upon to forthwith refrain yourselves and to cease and desist from making/publishing hereafter any such false, defamatory imputations against my client in any manner whatsoever.

26. In the event if you fail to comply with the aforesaid, my client has peremptorily instructed me to initiate appropriate civil and criminal proceedings or both against each of you in a competent court of law which shall be at your own peril as to all costs and consequences thereof, of which note.

**MUBIN SOLKAR**  
Advocate.