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Date: 14.09.2022

To,

1. Milan Sharma,

Reporter, India Today YouTube Channel

2. Dr. Soumya Swaminathan,

Chief Scientist, World Health Organization

3. Owner, Editor and Board of Directors of India Today Group

4. Susan Wojcicki

CEO of YouTube

5. Sundar Pichai

CEO of Google

6. Dr. Tedros Adhanom Ghebreyesus,

Director General of the World Health Organization

7. Satya Raghavan

Head of Entertainment Content at YouTube India

8. Sanjay Gupta

Country Head & VP, Google India

9. Sh. V.K. Paul

Member, NITI Aayog

Sub:- Wilful disregard and deliberate gross contempt of Hon'ble High Court's directions in **Nilesh Navalakha & Ors. Vs. Union of India 2021 SCC OnLine Bom 56**, and publishing an interview with false narrative and conspiracy theories to prejudice the witnesses of sub judice matters and court proceedings initiated against Bill Gates, Adar Poonawalla, Randeep Guleria and others where noticee no. 02 Dr. Soumya Swaminathan is co-accused and Hon'ble High Court has already issued notice to the Central Government i.e., Union of India and asked them to file reply regarding action being taken against main-stream media & social media platforms like You Tube, Facebook, Google etc. for suppressing death causing and other side effects of vaccines and misleading the people with false narratives of vaccine safety.

Ref: - (i) Order dated **26th August, 2022** passed by the Division Bench of Hon'ble Bombay High Court in the case of Shri. Dilip Lunawat vs. State of Maharashtra & Ors. in Civil Writ Petition (St) No. 2739 of 2022.

(ii) Reply given by ICMR on **8th August, 2022** that there is no scientific proof of long covid effects.

Under the authorization and instructions of my client **Mr. Mursalin Shaikh, Secretary General, Human Rights Security Council**. I, the undersigned, serve upon you the legal notice as under;

1. That the petitioner Shri. Dilip Lunawat on 29th January, 2022 have filed the Writ Petition (C) No. 5767 of 2022.

2. That the respondent in the said petition are

1. Serum Institute of India Pvt. Ltd., through Mr. Adar Poonawalla, CEO,
2. Mr. Bill Gates, Partner in manufacturing of Covishield vaccine at Serum Institute,
3. Union of India,
4. State of Maharashtra,
5. Ministry of Health & Family Welfare, Government of India,
6. Drug Controller General of India,
7. Dr. V.G. Somani, Drug Controller General of India,
8. Dr. Randeep Guleria, Director, AIIMS, New Delhi.

3. That the relevant prayers in the abovesaid Writ Petition filed by Shri. Dilip Lunawat reads thus;

- (i) *To hold that, the petitioner's daughter was given vaccine under deception, and false narratives by the state authorities that the vaccines are completely safe and if any serious or severe side effects occurs then the state authorities have define treatment, however when she suffered serious side effects then there was no treatment available and lastly she died due to side effects of vaccines as has been confirmed by the Government of India's AEFI Committee, therefore state authorities are responsible for causing her death by spreading false narratives and therefore, they are bound to compensate the petitioner in view of law laid by Hon'ble*

*Supreme Court and Hon'ble High Courts and more particularly in the case of **Registrar General, High Court of Meghalaya Vs. State of Meghalaya 2021 SCC OnLine Megh 130**;*

- (ii) To hold that the respondent state authorities are having callous criminal attitude as till date they have not changed their frequently asked questions and even on 15.12.2021 they are continuing their false narratives that they are having definite treatment for any side effects of vaccines;*
- (iii) To hold that as per law laid down by the Constitution Bench of Hon'ble Supreme Court in **Anita Khushwha's case (2016) 8 SCC 509**, the value of life of Indian citizen is not less than that of any person across the world either of America or of any country and therefore the Petitioner is entitled to the compensation in proportion to the compensation granted in other similar cases in United State, Singapore etc.*
- (iv) To hold that, in view of factual and legal position mentioned in the petition, the petitioner is entitled for an interim compensation of Rs. 1000 Crores as a deterrence to guilty and as succor to petitioner's family for loss of life of petitioner's daughter due to deliberate act of commission and omission on the part of respondents, with a liberty to the state authorities to recover it from the responsible officials and **Serum Institute, Pune** who is the manufacturer of Covishield Vaccine, as per law & ratio laid down in **Veena Sippy Vs. Mr. Narayan Dumbre & Ors. 2012 SCC OnLine Bom 339**;*

- (v) *Direct appropriate action by the Respondent No. 3 Union of India against all including main stream and social media like Google, YouTube, facebook etc. who are involved in the conspiracy of suppressing the correct data about death causing and other serious vaccine injuries and spreading false, misleading and one sided data to deprive the citizen to take informed decision and compel them to take vaccines;*
- (vi) *Direct the state authorities to take proper steps to stop further deaths of citizen and to publish the side effects of vaccines by following the rules of Universal Declaration on Bioethics & Human Rights, 2005 and as per law laid down in Master Haridan Kumar Vs. UOI 2019 SCC online Del 11929 and also as recently done by the Government of Japan;*
- (vii) *Declare that, the Petitioner's daughter Dr. Snehal Lunawat and other doctors as a Martyr who were given Covid vaccines through deception and coercion and who died due to side effects of vaccines.*
- (viii) *Open a dedicated research institute in India under the name of Dr. Snehal Lunawat.*
- (ix) *Pass any other order which this Hon'ble Court may deems fit and proper in the fact and circumstances of the case.*

4. That, the Division Bench of Hon'ble Bombay High Court on **26th August, 2022** passed the following order;

"1. Issue notice to the Respondents, returnable on 17th November 2022. Hamdast allowed.

2. AGP accepts notice for Respondent No.4. The learned Counsel accepts notice for Respondent No.2."

5. That, the pleadings of the above petition makes it clear that the conduct of you noticee no. 02-the co-accused Dr. Soumya Swaminathan and other members of WHO is sub judice before Hon'ble High Court. The relevant paras showing malafides and complexity of you noticee no. 02 in the petition are reproduced as under;

“Similar interviews are given by Respondent No. 8, Dr. Randeep Guleria Director of AIIMS, Delhi and others. They were asking everyone to take vaccines by stating that, the vaccines are completely safe.

Interview given by the Dr. Randeep Guleria is available on YouTube.

Link:- <https://fb.watch/7u26q6CL59/> ”

6. That the link given above i.e. in para 6 of the petition is actually the joint interview of Dr. Randeep Guleria, Dr. Soumya Swaminathan and Vismitha Gupta. The title of the said interview is “**WHO से कोविड-१९ पर अपने प्रश्न पूछिए - लाइव.**”

7. That there are ample proofs with my client that you noticee no. 02 Dr. Soumya Swaminathan is acting as an agent for vaccine mafia and pharma syndicate. You noticee no. 02 in order to serve your ulterior purposes of giving wrongful profits to your sponsorers like Bill Gates and others are running various ‘**conspiracy theories**’ and ‘**false narratives**’ to suppress the death causing and other side effects of vaccines. You are also trying to suppress and hide the tremendous good results of alternate medicines. You have and still trying to mislead the public at large that the Covid-19 vaccines are the safe and the only solution/ protection against the covid-19.

8. By way of your act of commission and omission many people succumbed to death and many faced with life time disabilities. For abovesaid offences we are

going to initiate appropriate action under section 115, 302, 420, 120(b), 34 etc. of Indian Penal Code.

9. Few evidences including stand of Government of India and State Governments proving malafides and non-credibility of the WHO and noticee no. 02 are as under;

9.1. WHO death logic of **47 lakh deaths** countered by Central Government.

Link: <https://www.bhaskar.com/opinion/news/column-of-bibek-debroy-and-aditya-sinha-serious-mistakes-of-who-should-also-be-debated-doubts-about-its-credibility-in-corona-era-129930668.html>

Title: बिबेक देबरॉय और आदित्य सिन्हा का कॉलम: डब्ल्यूएचओ की गंभीर भूलों पर भी बहस होनी चाहिए, कोरोना काल में इसकी विश्वसनीयता पर हुआ संदेह

9.2. Government filed affidavit before High Court that the data given by WHO regarding Ivermectin are flawed. High Court allowed use of Ivermectin as a treatment for covid-19

In additional affidavit filed by **Shri. Vikas S. N. Gaunekar as the Additional Secretary (Health), Government of Goa**, in the Case between **South Goa Association Vs. State of Goa PIL W.P. No. 1172 of 2021** in his affidavit dated **27th May, 2021** had made it clear that the WHO's directives are false, it is reads thus;

“22. I say that various studies conducted in different countries have shown that the said medicine has a positive effect on prevention and treatment/cure of patients. I say that the studies and reports are available on the website ivmmeta.com. I say that there are some reports which have found that the analysis by WHO on this medicine is flawed and that the mortality rate is actually much lower if the said medicine is used for early treatment as well as prophylaxis.”

Affidavit of Health Secretary of Goa.

Link:

https://drive.google.com/file/d/1aFayLTHqJSZuenoneB01kquZ_GOXhG0l/view?usp=sharing

In South Goa Advocates Association vs. State of Goa 2021 SCC OnLine

Bom 754 , it is ruled as under ;

“3...It is submitted that in fact WHO has issued an advisory against the use of Ivermactine for Covid related treatment.”

Link:https://drive.google.com/file/d/1W864B29p_K0DXA157V_SmdkYBtHaJZNQf/view?usp=sharing

In South Goa Advocates Association vs. State of Goa 2021 SCC OnLine

Bom 759 , it is ruled as under ;

13. As regards the use of Ivermectin, the issue raised by the petitioner in Writ Petition No.1216 of 2021 concerns mainly its prophylactic use. As for its therapeutic use, it is nobody's case that the medicine has not been included by ICMR for Covid-19 treatment protocol. Though the expert committee of the State, in its decision dated 13/05/2021, has recommended even prophylactic use of Ivermectin, from the affidavit filed by the State its the Additional Secretary (Health) what emerges is that the State has, for the present, decided that the medicine, i.e. Ivermectin, would be given to all suspected and symptomatic patients and provided in the kit to be supplied to positive patients in home isolation.

Link:https://drive.google.com/file/d/1_Vko9BIaSgQ8_RbA0vyn6QiUdMP8kZHv/view?usp=sharing

9.3. Sponsored tweet by noticee no. 02, Dr. Soumya Swaminathan against Ivermectin was deleted after notice from Indian Bar Association.

Title: DR. SOUMYA SWAMINATHAN DELETES HER CONTROVERSIAL TWEET

Link: <https://indianbarassociation.co.in/real-estate-attorney-bill-kuehling/>

9.4. Many more other data proving fraudulent activities of WHO are available at following website:-

(i). Awaken India Movement

Link:- <https://awakenindiamovement.com/>

(ii). Universal Health Organization

Link:- <https://uho.org.in/>

(iii). Indian Bar Association

Link:- <https://indianbarassociation.in/>

10. Despite this background you noticee no.1 called tainted & dishonest scientist Soumya Swaminathan (no.2) and published a stage managed interview to suppress the death causing side effects of covid-19 vaccines and to create prejudice in the mind of public at large. The said interview dated **02.09.2022** is titled as “**Soumya Swaminathan Interview: WHO Scientist Talks About Post COVID Effects, Variants & Booster Dose**” and available at

Link:- <https://youtu.be/vAz9-jIEfxQ>

11. That every word and narrative said by no. 2 Dr. Soumya Swaminathan in her interview on **02.09.2022** published by no. 1 **India Today** is out and out false as it is proved time and again to be against the real and scientific data.

12. That the senior most domain expert, epidemiologist Dr. Amitav Banerjee, MBBS, MD, who served in Indian Armed Forces from 1978 to 2005 and Chief of army staff Gold Medal winner, currently head of Community medicine at Dr. D.Y. Patil University Pune, in his recent article dated **9th September 2022** titled as **‘Vaccination: Rising Deaths and False Narrative;** have exposed the noticee no.2 Dr. Soumya Swaminathan, The article is available at following link:-

<https://empirediaries.com/2022/09/09/covid19-pandemic/>

The important para reads thus;

“Strangely, there is no mention of vaccination status against Covid-19. The WHO’s chief scientist Soumya Swaminathan, meanwhile, has been talking through the hat. She [tweeted](#), “We need to prepare for large increases in cardiovascular, neurological and mental health disorders in countries affected by the #SARSCoV2# pandemic.” For the chief scientist at the WHO, it’s a grave omission indeed not to consider the ill-effects of the experimental vaccine, however remote and unlikely that may be.

Such biased news reporting will make the reader attribute all complications to “long Covid,” which is increasingly being promoted as an emerging problem. And more disturbingly, it will brush under the carpet any complications due to the experimental vaccines as all adverse events following immunization (AEFI) would be conveniently covered under the blanket of “long Covid.”

...There are other red signals. Edward Dowd, author of the [book](#), “Cause Unknown: The Epidemic of Sudden Deaths in 2021 and 2022,” has been analyzing data on all mortality since March 2021 after hearing about many anecdotal accounts of vaccine injury.

He found a huge spike in sudden deaths spanning the fall of 2021 to early 2022 in the working age cohort corresponding to the vaccine mandate in the US for workers. People from 25 to 44 years of age experienced a dramatic 84% rise in excess mortality coinciding with mass vaccine mandates – 61,000 Americans died in the period from March 2021 to February 2022.

His findings were corroborated by studying insurance claims. Closer to home, a six-fold increase in heart attacks was observed in Mumbai in the year 2021 as observed by a critical-thinking data analyst from IIT Bombay.

Regrettably, in the ongoing pandemic, this approach has been found lacking on the part of the WHO, the CDC, and other haloed health research institutions. Eminence-based medicine has taken precedence over evidence-based medicine. Scientists, researchers, academicians and others surrendered the scientific approach and made a beeline for their one minute of fame in the era of 24×7 news channels.

In the early days of the pandemic, there was evidence that immunity after recovery from natural infection can perhaps last [indefinitely](#). Subsequently, while studies from Israel established that natural immunity is 13 times more robust

than vaccine-induced immunity, the WHO continued to ignore the evidence while recommending mass vaccination.

The global scientific consensus seems to be on the brink of another major act of omission now, or perhaps, commission. It is relentlessly promoting mass vaccination when most of the people in countries such as India have already experienced the natural infection and therefore are already well protected.

According to the evidence we have so far, vaccinating them wouldn't confer any additional benefit while will subject them to the risk of adverse events, howsoever remote the chances are. More importantly, it is missing out on the opportunity to resolve the dilemma of a sudden spike in deaths among young people across the world – whether they are due to the disease or the vaccine.

Those who have recovered from natural infection need not be vaccinated if we follow the science as well as apply common sense. It is the basic requirement of any experiment to have two different groups. In this case, we have the perfect opportunity to have a group of vaccinated people who have never suffered from the natural infection and the other group of unvaccinated people who have recovered from natural infection.

These groups could have been followed forward in time to compare the short-term and long-term adverse events and provide hard evidence of the cause-and-effect relationship. On the other hand, it appears that there is a desperate

attempt to muddy the waters by eliminating the possibility of gathering this hard evidence.

The largest mass experiment in human history is being performed without a control group, reminding us of the public health quackery practised during ancient times – incredible stuff like the bloodletting that killed George Washington, the first president of the US.”

13. Even otherwise, the suggestions of WHO are not binding in India and should not be relied as they are null & void and non-est as per specific law laid down by the Constitution Bench of Hon’ble Supreme Court in **Mineral Development Ltd. vs. State of Bihar and Anr. (1960) 2 SCR 609, State of Punjab v. Davinder Pal Singh Bhullar (2011) 14 SCC 770, A.K. Kraipak & Ors vs. Union of India & Ors. AIR 1970 SC 150.**

14. The law is made very clear in India that the recommendation of anybody who is sponsored by the person like Bill Gates, the seller of vaccine companies and interested in his profit, should be treated as null & void and coram-non-judice.

15. The views of honest domain experts and epidemiologists across the world and in India are very clear and they exposes the malafides, falsity & dishonesty of the noticee no. 02 Dr. Soumya Swaminathan.

16. You noticee no.2 Dr. Soumya by your secret agenda for toxic philanthropist “Bill Gates”, have caused wrongful loss of thousands to lacs of crores of public money being wasted by Government of India. It is an offence **under section 109, 409, 120(b) & 34 of IPC.**

17. Under these circumstances it is expected from all the honest media houses that they should not have interviewed and/or published the unilateral false

narratives of dishonest and sponsored experts like noticee no.2 Dr. Soumya Swaminathan.

18. But you noticee no.1 joined the conspiracy and published the interview of tainted and dishonest expert Dr. Soumya Swaminathan i.e., noticee no.2.

Therefore, you notice no.1 is also liable for prosecution of all the offences under **Section 115, 302, 409, 420 etc. of IPC** in view of **Section 120(b), 34 of IPC & section 10 of Indian Evidence Act.**

19. Worth to mention here that around 18 European countries have banned Covishield (AstraZenec) vaccines for death causing side effects

Link: - <https://www.aljazeera.com/news/2021/3/15/which-countries-have-halted-use-of-astrazenecas-covid-vaccine>

But noticee no.2 Dr. Soumya Swaminathan & WHO have never published any caution to public at large. They just made a small note of side effects of Guillian Barre Syndrome (GBS).

20. That Hon'ble Supreme Court in the case of **Jacob Puliyel v. Union of India, 2022 SCC OnLine SC 533** had given specific directions for publication of data regarding side effects of vaccines. The Order reads thus;

“93[...] (viii) *We are also of the opinion that information relating to adverse effects following immunisation is crucial for creating awareness around vaccines and their efficacy, apart from being instrumental in further scientific studies around the pandemic. Recognising the imperative need for collection of requisite data of adverse events and wider participation in terms of reporting, the Union of India is directed to facilitate reporting of suspected adverse events by individuals and private doctors on an accessible virtual platform. **These reports shall be made publicly accessible, without compromising on protecting the confidentiality of the***

persons reporting, with all necessary steps to create awareness of the existence of such a platform and of the information required to navigate the platform to be undertaken by the Union of India at the earliest.”

21. Hon’ble Supreme Court on **29.08.2022** in the case of **Rachna Gangu Vs. Union of India 2022 SCC OnLine SC 1125** in a case of death of children due to Covishield vaccine has passed following order;

“1. It is submitted that 18-years-old daughter of the petitioner No. 1 received first dose of Covishield Covid-19 vaccine on 29.05.2021 and lost her life on 19.06.2021. On the other hand, 20-years-old daughter of the petitioner No. 2 received the first dose of Covishield Covid-19 vaccine on 18.06.2021 and she lost her life on 10.07.2021. It is submitted that after vaccination, the deceased girls suffered from severe Adverse Effects Following Immunization (‘AEFI’). The petitioners had made representations to the authorities concerned which had not been adequately replied. The only response to the petitioner No. 2 by the Senior Manager, Clinical Research and Pharmacovigilance Department, Serum Institute of India Pvt. Ltd., Pune had been that the Covid-19 infection was considered as the cause of Multisystem Inflammatory Syndrome; that Covishield does not contain SARSCoV-2 virus and cannot cause Covid-19 infection; and that vaccine is not known to cause Multisystem Inflammatory Syndrome.

2. The petitioners have prayed for the following reliefs: -

“1. Issue a writ of mandamus or any other appropriate writ, order or direction appointing an expert medical board, independent of the Government, to forthwith inquire

into and investigate into the deaths of the daughters of Petitioners No. 1 & 2, and to share the report of the autopsy and investigation with the petitioners in a time-bound manner;

2. Issue a writ of mandamus or any other appropriate writ, order or direction directing the above appointed expert medical board to prepare a protocol for early detection of and timely treatment for the AEFI due to the Covid-19 vaccine such as the ones that led to the deaths of the daughters of Petitioners No. 1 & 2; and

3. Issue a writ of mandamus or any other appropriate writ, order or direction directing the Respondents to grant significant monetary compensation to the Petitioners No. 1 & 2, which will be donated by the Petitioners to organizations working on social issues.”

3. Though, ordinarily we would have considered relegating the petitioners to the appropriate regular remedies because the matter might involve determination of certain basic questions of fact so as to bring it within the four-corners of a case of medical negligence but, having regard to the post-mortem report filed with the additional documents, the submissions that the Government has not responded to the petitioners’ representations, and the nature of reliefs claimed, it appears appropriate to call upon the respondents to reply.

4. Hence, issue notice.”

22. Hon’ble Kerala High Court in the case of Sayeeda Vs. Union of India 2022 SCC OnLine Ker 4514 on 1st Sept,2022 have passed the following order;

V.G. ARUN, J.— *The documents on record prima facie shows that the petitioner's husband died due to adverse events following immunization. This writ petition is filed seeking the following reliefs;*

“i) Set aside Exhibit P9 issued by the 5th respondent in response to Exhibit P8.

ii) Issue a writ in the nature of mandamus or any other writ, direction or order directing the respondents to grant ex gratia compensation offered to families of deceased who have succumbed to Covid 19 to the petitioner and her children.”

2. When the matter was taken up on previous occasion, learned ASG was directed to get instructions as to whether the Government of India has formulated any policy for compensating the victims of adverse events, following Covid- 19 vaccination. Learned ASG submitted that no such policy has so far been formulated.

3. Sitting in this jurisdiction, I have come across at least three cases where pleadings are to the effect that the person who had undergone Covid-19 immunization vaccination had succumbed to the after effects of vaccination. Therefore, even if the numbers are very few, there are instances where persons are suspected to have succumbed to the after effects of immunization. In such circumstances, respondents 2 and 8 are bound to formulate a policy for identifying such cases and compensating the dependants of the victim. The second respondent is hence directed to formulate policy/guidelines for identifying cases of death due to the after effects of Covid-19 vaccination and for compensating the

dependants of the victim. The needful in this regard shall be done as expeditiously as possible and at any rate, within three months.

4. Post after three months.”

23. The Japan Government had also made declaration on their website

“Consent to vaccination

Although we encourage all citizens to receive the COVID-19 vaccination, it is not compulsory or mandatory. Vaccination will be given only with the consent of the person to be vaccinated after the information provided. Please get vaccinated of your own decision, understanding both the effectiveness in preventing infectious diseases and the risk of side effects. No vaccination will be given without consent. Please do not force anyone in your workplace or those who around you to be vaccinated, and do not discriminate against those who have not been vaccinated.”

24. But WHO and their dishonest Scientist like Dr. Soumya Swaminathan (no. 2) are trying their level best to spread misinformation by dishonest concealment, twisting and suppression of material facts.

25. This proves that the WHO (**notice no.6 Dr. Tedros**) and their dishonest scientists are not concerned with the safety & protection of people across the world but they are working for the welfare of the vaccine companies only.

26. As a part of criminal conspiracy of vaccine mafia, the noticee no.2 Dr. Soumya is, delivering interviews and tainted, media houses are publishing their false narratives and conspiracy theories.

27. In **Raman Lal Vs. State of Rajasthan 2000 SCC OnLine Raj 226**, it is ruled as under;

“D] Conspiracy – I.P.C. Sec. 120 (B) – Apex court made it clear that an inference of conspiracy has to be drawn on the basis of circumstantial evidence only because it becomes difficult to get direct evidence on such issue – The offence can only be proved largely from the inference drawn from acts or illegal omission committed by them in furtherance of a common design – Once such a conspiracy is proved, act of one conspirator becomes the act of the others – A Co-conspirator who joins subsequently and commits overt acts in furtherance of the conspiracy must also be held liable – Proceeding against accused cannot be quashed.”

28. Section 10 of the Indian Evidence act reads thus;

“Things said or done by conspirator in reference to common design. — Where there is reasonable ground to believe that two or more persons have conspired together to commit an offence or an actionable wrong, anything said, done or written by any one of such persons in reference to their common intention, after the time when such intention was first entertained by any one of them, is a relevant fact as against each of the persons believed to be so conspiring, as well for the purpose of proving the existence of the conspiracy as for the purpose of showing that any such person was a party to it.”

29. OFFENCE OF CONTEMPT OF SUPREME COURT & HIGH COURT: -

29.1. That, the Hon'ble Bombay High Court has issued notice to the head of vaccine mafia & pharma syndicate Shri. Bill Gates and his aide Adar Poonawalla etc. on **26th August, 2022.**

29.2. The question of false narratives by pharma mafia, social media and mainstream media regarding suppression death causing side effects of vaccines and misleading people that vaccines are completely safe is Sub-Judice before Hon'ble Bombay High Court.

The said prayer clause reads thus:

“v) Direct appropriate action by the Respondent No. 3 Union of India against all including main stream and social media like Google, YouTube, facebook etc. who are involved in the conspiracy of suppressing the correct data about death causing and other serious vaccine injuries and spreading false, misleading and one sided data to deprive the citizen to take informed decision and compel them to take vaccines;

*vi) Direct the state authorities to take proper steps to stop further deaths of citizen and to publish the side effects of vaccines by following the rules of Universal Declaration on Bioethics & Human Rights, 2005 and as per law laid down in **Master Haridan Kumar Vs. UOI 2019 SCC online Del 11929** and also as recently done by the Government of Japan;*

29.3. After perceiving adverse atmosphere, you noticee no.1 & 2 hatched the conspiracy and published an interview on **02nd September, 2022** with same false narratives & conspiracy theories. The interview is available on following **link:**

<https://youtu.be/vAz9-jIEfxQ>

Link title: Soumya Swaminathan Interview: WHO Scientist Talks About Post COVID Effects, Variants & Booster Dose.

29.4. That it is settled law laid down by Hon'ble Supreme Court & Hon'ble Bombay High Court that any publication intended to prejudice a Sub-Judice case is an offence of contempt.

29.5. That in **Nilesh Navalakha & Ors. Vs. Union of India 2021 SCC OnLine Bom 56** it is ruled as under;

“Nothing is more incumbent upon courts of justice, than to preserve their proceedings from being misrepresented; nor is there anything of more pernicious consequence, than to prejudice the minds of the public against persons concerned as parties in causes before the cause is finally heard’. The learned Lord Chancellor characterized contempt as of three kinds, namely, scandalizing the court, abusing parties in court, prejudicing mankind against parties and the court before the cause is heard.

Salmon, L.J., further pointed out that ‘no one should imagine that he is safe from committal for contempt of court if, knowing or having good reason to believe that criminal proceedings are imminent, he chooses to publish matters calculated to prejudice a fair trial

*But to constitute contempt of court, in the words of Lord Russel, C.J., ‘the applicant must show that something has been published which either is clearly intended, or at least is calculated, to prejudice a trial which is pending’. (See *The Queen v. Payne*, [1896] 1 Q.B. 577). In *The Queen v. Gray*, [1900] 2 Q.B. 36, the phrase ‘contempt of court’ is defined’ as, inter alia, ‘something done calculated to obstruct or interfere with the due course of justice or the lawful process of the courts’.*

In Halsbury's Laws of England, 3rd Edn. Vol. 8, it is stated at p. 8, 'It is sufficient if it is clear that the comment tends to prejudice the trial of the action'. Adverting to the third category of contempt described by Lord Hardwicke, L.C., the learned author says at p. 8 thus:

'The effect of such misrepresentations may be not only to deter persons from coming forward to give evidence on one side, but to induce witnesses to give evidence on the other side alone, to prejudice the minds of jurors, or to cause the parties to discontinue or compromise, or to deter other persons with good causes of action from coming to the court.'

27. The said view has been accepted and followed also in India : see State v. Biswanath Mohapatra, ILR 1955 Cut 305 and Ganesh Shankar Vidyarthi case, AIR 1929 All 81.

*29. On the said authorities it is settled law that a person will be guilty of contempt of court if the act done by him is intended or calculated or likely to interfere with the course of justice. ****

(underlining for emphasis by us)

240. In P.C. Sen, In re, reported in AIR 1970 SC 1821, the Supreme Court was seized of an appeal carried from an order of the Calcutta High Court by none other than the Chief Minister of West Bengal, whereby he was held guilty of contempt and his conduct was disapproved. On the law of contempt, this is what the Court held:

"8. The law relating to contempt of Court is well settled. Any act done or writing published which is calculated to bring a court or a Judge into contempt, or to lower his authority, or to interfere with the due course of justice or the lawful process of the Court,

*is a contempt of Court; R.V. Gray [[1900] 2 Q.B. 36]. Contempt by speech or writing may be by scandalising the Court itself, or by abusing parties to actions, or by prejudicing mankind in favour of or against a party before the cause is heard. It is incumbent upon Courts of justice to preserve their proceedings from being misrepresented, for prejudicing the minds of the public against persons concerned as parties in causes before the cause is finally heard has pernicious consequences. Speeches or writings misrepresenting the proceedings of the Court or prejudicing the public for or against a party or involving reflections on parties to a proceeding amount to contempt. To make a speech tending to influence the result of a pending trial, whether civil or criminal is a grave contempt. Comments on pending proceedings, if emanating from the parties or their lawyers, are generally a more serious contempt than those coming from independent sources. The question in all cases of comment on pending proceedings is not whether the publication does interfere, but whether it tends to interfere, with the due course of justice. The question is not so much of the intention of the contemner as whether it is calculated to interfere with the administration of justice. As observed by the Judicial Committee in *Devi Prasad Sharma v. King-Emperor*, (1942-43) 70 IA 216 at p. 224:*

“...the test applied by the ... Board which heard the reference was whether the words complained of were in the circumstances calculated to obstruct or interfere with the course of justice and the due administration of the law.”

If, therefore, the speech which was broadcast by the Chief Minister was calculated to interfere with the course of justice, it was liable to be declared a contempt of the Court even assuming

that he had not intended thereby to interfere with the due course of justice.”

29.6. It has to be borne in mind that an offending act, though not influencing the Judge's mind, may affect the conduct of parties to the proceeding which is likely to affect the course of true justice [**Awadh Narain Singh v. Jwala Prasad, AIR 1956 Pat 321 (DB)**].

29.7. The law of contempt throws a ring of protection around the entire course of litigation. Party, witness, Judge or counsel are all integral parts of that process. Anything which tends to impair the legitimate freedom of any these cannot but result in obstructing the course of justice. [**H. Syama Sunder Rao Vs. Union of India 2006 SCC OnLine Del 1392**]

29.8. A person can be convicted of Contempt of Court for interfering with the course of justice when it is shown:

(a) that something has been published which is either clearly intended or at least is calculated to prejudice a trial which is pending;

(b) that the offending article was published with the knowledge of the pending cause or with the knowledge that the cause was imminent; and

(c) that the matter published tended substantially to interfere with the due course of justice or was calculated to create prejudice in the public mind.

[please see :- Gaini Ram Vs. Ramnath Dutt AIR 1955 Raj 123 (DB)]

29.9. Hence you notice no.1 & 2 have committed offences of Civil Contempt of binding precedents of Hon'ble Bombay High Court and also committed criminal contempt by creating false narratives causing prejudice to the fair trial and therefore you are guilty of offences under **section 2(B), (C), 12 of**

Contempt of Courts Act 1971 read with Article. 129, 215 of the Constitution of India.

29.10. You are also guilty of offences under **section 52, 192, 193, 120(b) & 34** etc. of **IPC** for creating false evidences with intention to be used in court proceedings.

29.11. Section **52, 192 & 193 of Indian Penal Code** reads thus;

“Section 52 in The Indian Penal Code

52. Good faith - Nothing is said to be done or believed in “good faith” which is done or believed without due care and attention.

Section 192 in The Indian Penal Code

192. Fabricating false evidence - Whoever causes any circumstance to exist or 1 [makes any false entry in any book or record, or electronic record or makes any document or electronic record containing a false statement,] intending that such circumstance, false entry or false statement may appear in evidence in a judicial proceeding, or in a proceeding taken by law before a public servant as such, or before an arbitrator, and that such circumstance, false entry or false statement, so appearing in evidence, may cause any person who in such proceeding is to form an opinion upon the evidence, to entertain an erroneous opinion touching any point material to the result of such proceeding is said “to fabricate false evidence”

Section 193 in The Indian Penal Code

193. Punishment for false evidence - Whoever intentionally gives false evidence in any of a judicial proceeding, or fabricates false evidence for the purpose of being used in any stage of a judicial proceeding, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall

also be liable to fine; and whoever intentionally gives or fabricates false evidence in any other case, shall be punished with imprisonment of either description for a term which may extend to three years, and shall also be liable to fine.”

30. The other offences attracted against you notice are as under:-

Section 115 of Indian Penal Code reads thus,

“115. Abetment of offence punishable with death or imprisonment for life.—*if offence not committed.—Whoever abets the commission of an offence punishable with death or 1 [imprisonment for life], shall, if that offence be not committed in consequence of the abetment, and no express provision is made by this Code for the punishment of such abetment, be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine; if act causing harm be done in consequence.—and if any act for which the abettor is liable in consequence of the abetment, and which causes hurt to any person, is done, the abettor shall be liable to imprisonment of either description for a term which may extend to fourteen years, and shall also be liable to fine.”*

Section 302 of Indian Penal Code reads thus,

“302. Punishment for murder - *Whoever commits murder shall be punished with death or 1 [imprisonment for life], and shall also be liable to fine.”*

Section 52 of Indian Penal Code, reads thus,

*“52. **“Good faith”**.—Nothing is said to be done or believed in “good faith” which is done or believed without due care and attention.”*

Section 409 of Indian Penal Code reads thus.

*“409. **Criminal breach of trust by public servant, or by banker, merchant or agent**.—Whoever, being in any manner entrusted with property, or with any dominion over property in his capacity of a public servant or in the way of his business as a banker, merchant, factor, broker, attorney or agent, commits criminal breach of trust in respect of that property, shall be punished with 1 [imprisonment for life], or with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine.”*

Section 420 of Indian Penal Code reads thus,

*“420. **Cheating and dishonestly inducing delivery of property**.—Whoever cheats and thereby dishonestly induces the person deceived to deliver any property to any person, or to make, alter or destroy the whole or any part of a valuable security, or anything which is signed or sealed, and which is capable of being converted into a valuable security, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine.”*

Section 471 of Indian Penal Code reads thus,

*“471. **Using as genuine a forged 1[document or electronic record]**.—Whoever fraudulently or dishonestly uses as genuine any 1[document or electronic record] which he*

knows or has reason to believe to be a forged 1[document or electronic record], shall be punished in the same manner as if he had forged such 1[document or electronic record].”

Section 474 of Indian Penal Code reads thus,

“474. Having possession of document described in section 466 or 467, knowing it to be forged and intending to use it as genuine.—1[Whoever has in his possession any document or electronic record, knowing the same to be forged and intending that the same shall fraudulently or dishonestly be used as genuine, shall, if the document or electronic record is one of the description mentioned in section 466 of this Code], be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine; and if the document is one of the description mentioned in section 467, shall be punished with 2[imprisonment for life], or with imprisonment of either description, for a term which may extend to seven years, and shall also be liable to fine.”

Section 120(B) of Indian Penal Code reads thus,

“120B. Punishment of criminal conspiracy.—(1) Whoever is a party to a criminal conspiracy to commit an offence punishable with death, 1 [imprisonment for life] or rigorous imprisonment for a term of two years or upwards, shall, where no express provision is made in this Code for the punishment of such a conspiracy, be punished in the same manner as if he had abetted such offence. (2) Whoever is a party to a criminal conspiracy other than a criminal conspiracy to commit an offence punishable as aforesaid

shall be punished with imprisonment of either description for a term not exceeding six months, or with fine or with both.”

Section 109 of Indian Penal Code reads thus,

“109. Punishment of abetment if the act abetted is committed in consequence and where no express provision is made for its punishment.—*Whoever abets any offence shall, if the act abetted is committed in consequence of the abetment, and no express provision is made by this Code for the punishment of such abetment, be punished with the punishment provided for the offence.”*

Section 34 of Indian Penal Code reads thus,

“34. Acts done by several persons in furtherance of common intention.—*When a criminal act is done by several persons in furtherance of the common intention of all, each of such persons is liable for that act in the same manner as if it were done by him alone”*

Section 304 of Indian Penal Code reads thus,

“304. Punishment for culpable homicide not amounting to murder.—*Whoever commits culpable homicide not amounting to murder, shall be punished with 1 [imprisonment for life], or imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine, if the act by which the death is caused is done with the intention of causing death, or of causing such bodily injury as is likely to cause death; or with imprisonment of either description for a term which*

may extend to ten years, or with fine, or with both, if the act is done with the knowledge that it is likely to cause death, but without any intention to cause death, or to cause such bodily injury as is likely to cause death.”

31. That you **noticee no. 4 & 5** You Tube & Google are deleting the videos which are showing the true and correct data of vaccine deaths and other side effects.

You also deleted the videos where true reporting of Court proceedings are given in the interview.

For example, the interview of Adv. Nilesh Ojha published by Q-vive & Anarehy for freedom the following link was deleted by you.

Link:

i) <https://www.youtube.com/watch?v=-QC9cFndJAE>

ii) <https://youtu.be/YBZCO0oUqaQ>

32. This shows the underhand dealing between YouTube & Google (**no.4 & 5**) with vaccine mafia in suppressing the truth and spreading misinformation and disinformation and pushing the public at large to risk their life.

33. Hence you people are ‘**guilty of offences of mass – murders and genocide.**’

34. Your act is in direct contempt of binding precedents of Hon’ble Supreme Court & High Court.

35. That you notice no. 9 Sh. V.K. Paul in your interview published in ‘Times of India’ on March 2021 also made a false and misleading statement that ‘Covishield is a completely safe.’ The link of article is as below :

Link:

<https://twitter.com/Teensthack/status/1374923958856818691?t=4z8AfSRWilLuaz7Pv1IH-Q&s=08>

Hence, in view of section 120(B) of IPC, you no. 9 is also liable for prosecution alongwith main accused and the main conspirators.

36. Hence you are hereby called upon to;

(i) Forthwith remove the videos of tainted & dishonest scientist Dr. Soumya Swaminathan and any other person who are suppressing death causing side effects of vaccines and running false narratives and conspiracy theories to give wrongful benefit to vaccine companies;

(ii) Publish apology in all mainstream media and social media;

(iii) Publish true facts by calling honest experts like

(a) Dr. Sanjay Rai, Epidemiologist, AIIMS, New Delhi

(b) Dr. Jay Prakash Muliya, Member, NTAGI, Government of India, New Delhi

(c) Dr. Arvind Kushwaha, MBBS M.D, Epidemiologist, AIIMS, Nagpur

(d) Dr. Amitav Banerjee, M.B.B.S MD, Epidemiologist, Head Community Medicine DY Patil University Pune.

(e) Dr. Amar Singh Azad, M.B.B.S. M.D (Pediatrics), M.D (Medicine), Retd. Senior Medical Officer (SMO)

(f) Dr. Bhamnu Prakash, Neurosurgeon, MBBS, MS, MCh. NS, PGIMER

(g) Prof. Bhaskaran Raman, Professor IIT, Mumbai

(h) Dr. Abhay Chedda, BHMS, CCAH, FCAH.

(iv) Stop Committing contempt of Supreme Court & High Court guidelines and stop censoring the honest opinions of experts and public regarding death causing and serious side effects of vaccines.

37. Take a note that the present notice is being issued by reserving other rights and is independent of legal actions under criminal, civil or contempt jurisdictions of the courts of law.

38. Present notice is being given only with a view to stop you from committing aggravated offences and to save & protect the life of large population and to protect Government & public money being misutilized for unauthorized purposes.

Sincerely



Adv. Abhishek Mishra

Copy To:

1) All Main Stream & Social media platforms with request to forth with stop such 'false narratives' & 'conspiracy theories' and to publish the correct information.