IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL JURISDICTION

WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT: - MUMBAI

IMRAN KHAN PAL **...PETITIONER**

VERSUS

UNION OF INDIA & ANR. **...RESPONDENTS**

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		30.05.2019.	
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K.B. Bharadwaj

Advocates for the Petitioner

MZM Legal

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

WRIT PETITION NO. 2025

IMRAN KHAN PAL ...Petitioner

Versus

UNION OF INDIA AND ORS. ...Respondents

The Bench as per Roster (Along with Clause Number of Case Type under which the matter is covered.)	SUBJECT AND SUBSUBJECT (Select From the List)	SUBORDINATE COURT DETAILS. (wherever required)
THE CHIEF JUSTICE AND AND THE JUSTICE ADVAIT M SETHNA (I)		N.A.

K B Naradwaj

Advocates for Petitioner

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

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PROFORMA

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IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL JURISDICTION
WRIT PETITION (OS) NO. _____ OF 2026

IMRAN KHAN PAL **...PETITIONER**

VERSUS

UNION OF INDIA & ANR. **...RESPONDENTS**

SYNOPSIS

A. CHALLENGE IN BRIEF

The Petitioner invokes the extraordinary writ jurisdiction of this Hon'ble Court to challenge the arbitrary and unconstitutional Leave India Notice ("**LIN**") issued by the Foreigners Regional Registration Office, Mumbai ("**FRRO**" / "**Respondent No. 2**"), thereby violating Articles 14 and 21 of the Constitution of India, 1950. The LIN directs the Petitioner to leave India by 28.10.2026 without disclosing any reasons, supporting material, or specific statutory contravention. It was issued without inquiry, a show-cause notice, or any opportunity for the Petitioner to respond to the alleged violations. Even a cursory application of mind by Respondent No. 2 before issuing a measure of such gravity would have revealed the Petitioner's subsisting Overseas Citizen of India ("**OCI**") status and the undisputed facts relating to the underlying incident, namely, his unjust and brief detention by the police on 10.10.2026 near August Kranti Maidan at Nana Chowk.

The record will show that (i) no gathering was taking place when the Petitioner arrived; (ii) he neither entered any restricted or barricaded area nor disobeyed the police direction to leave; and (iii) he was apprehended only after the media surrounded him while he was returning to his nearby vehicle. The Petitioner has not breached either any provision of the Immigration and Foreigners Act or the Citizenship Act, which governs his rights and duties as a OCI and neither does the LIN

cite any specific breach. The Petitioner has resided peacefully in India since the age of two (2), has deep-rooted familial, marital, educational, and professional ties to the country, and has no criminal antecedents. By disregarding these material facts, the impugned LIN reflects patent non-application of mind and the arbitrary targeting of the Petitioner as a public figure.

Not only is the LIN manifestly disproportionate, if implemented, it would reduce the very principles of natural justice that the Respondents are duty bound to uphold, to nothing but a dead letter. Accordingly, the Petitioner thus seeks urgent ad-interim relief against the operation and implementation of the impugned LIN and final relief as to its quashing.

B. LIST OF DATES AND EVENTS

No.	Date	Particulars	Exhibit	Page No.
1.	15.12.2006	The Petitioner received OCI Card and the status of a OCI Card holder, prior to which he held a Person of Indian Origin Card, which was substituted by the OCI card.	**"A"**	62
2.	30.05.2019	The Petitioner attained a Passport of United States of America bearing No. 566979012.	**"B"**	63
3.	10.10.2026	The Petitioner came to know about protests being held at various locations across India and travelled towards the reported area along with his mother and sister when he observed that the area had been barricaded and police personnel had been deployed.		
4.	10.10.2026 @ 5:00 PM	Upon the Petitioner enquiring about the barricading the police personnel present at the location instructed the Petitioner to		

		leave the location, which he did and the police did not stop him. At 5:19 pm when the Petitioner was walking back to his vehicle, media persons suddenly recognized the Petitioner and started asking for his remarks. It is then that the police personnel suddenly apprehended him and placed him, along with his family in a police vehicle.		
5.	10.10.2026 @ 7:00 PM	Thereafter, the Petitioner and his family were taken to Yellow Gate Police Station and upon enquiring about his reasons of apprehension, he was informed by the officers that they had no instructions in that regard and that him and his family are free to leave.		
6.	10.10.2026 @ 23:30 PM	FIR bearing C.R. No. 0813 of 2026 under section 223, 126(2) 189(3), and 189(5) of BNS, 2023 was registered by the Gamdevi Police Station wherein the Petitioner is named as Accused No.11.		
7.	15.10.2026	The Petitioner received the Impugned Notice dated 14.10.2026.	"C"	64
8.		Hence this Writ Petition		

C. POINTS TO BE URGED

As per the Writ Petition

D. ACTS TO BE RELIED UPON

Constitution of India
Immigration and Foreigners Act, 2025
Citizenship Act, 1955

E. AUTHORITIES TO BE RELIED UPON

To be submitted at the time of the hearing.

Dated this 17th day of October 2026

K Bharadwaj

MZM LEGAL

ADVOCATES FOR THE PETITIONER



IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

WRIT PETITION NO. ___OF 2026

DISTRICT: MUMBAI.

IN THE MATTER OF ARTICLE 226 R/W 227 OF THE CONSTITUTION OF INDIA, 1950

AND

9

IN THE MATTER OF THE ILLEGAL ISSUANCE OF LEAVE INDIA NOTICE DATED 14 OCTOBER 2026 ISSUED BY THE FOREIGNERS REGIONAL REGISTRATION OFFICER, MUMBAI.

AND

IN THE MATTER OF MECHANICAL SUSPENSION OF CONSTITUTIONAL RIGHTS INCLUDING UNDER ARTICLES 14 AND 21.

IMRAN KHAN PAL)

Aged about 44 years, Occupation:)

Actor & filmmaker, holding)

United States of America Passport)

No. (55597012) and OCI)

Certificate of Registration No.)



(085019), currently residing at)
Clefepete building 9th Floor,)
Carter Road Bandra West,)
Mumbai) **... PETITIONER**

-VERSUS-

UNION OF INDIA)
through the Joint Secretary,)
Ministry of Law & Justice,)
Aayakar Bhavan, Maharshi Karve)
Road, Marine Lines – 400020) **... RESPONDENT NO. 1**

OFFICE OF THE)
FOREIGNERS REGIONAL)
REGISTRATION OFFICER,)
MUMBAI)
Having address at 78/1, Badruddin)
Tayabji Marg, behind St Xavier)
College, Dhobi Talao, Chhatrapati)
Shivaji Terminus Area Fort)
Mumbai, Maharashtra-400001) **... RESPONDENT NO. 2**



9

TO

THE HON'BLE CHIEF JUSTICE AND OTHER HON'BLE JUDGES OF THE HIGH COURT OF JUDICATURE AT BOMBAY

HUMBLE PETITON OF THE PETITIONER ABOVENAMED UNDER ARTICLE 226 R/W 227 OF THE CONSTITUTION OF INDIA, 1950.

MOST RESPECTFULLY SHEWETH:

THE PARTIES

The Petitioner

1. The Petitioner herein is a law-abiding citizen. The Petitioner was born in and thereby became a citizen of the United States of America. He came to India at the age of two, and has, since then, lived almost his entire life in India. He completed his schooling in India, works in India, and presently resides with his mother at the address mentioned in the cause title. He was married in India. He has a child who was



Petitioner's American passport bearing no. 566979012 dated 30.05.2019 is annexed hereto and marked as **Exhibit "B".**

The Respondents

4. Respondent No. 1 is the Union of India, through the Joint Secretary, Ministry of Law and Justice. Respondent No. 1 exercises superintendence and control over Respondent No. 2 as relevant to the present matter.

5. Respondent No. 2 is the office of the Foreigners Regional Registration Officer, Mumbai ("**FRRO**"). Respondent No. 2 is an office under the Bureau of Immigration constituted under Section 5 of the Immigration and Foreigners Act, 2025 ("**IFA**"). Respondent No. 2 has issued the impugned Leave India Notice bearing O.W. No. FRRO/BOI/MUM/REG/2026-4250 dated 14.10.2026 (the "**Impugned Notice**" / "**LIN**").

6. Both Respondent Nos. 1 and 2 qualify as "the State" within the ambit of Article 12 of the Constitution of India, 1950.

NOTARY AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO 45056 EXPIRY DATE 07.03.2030 GOVT. OF INDIA

born in Mumbai and is an Indian. Petitioner is as an Overseas Citizen of India ("**OCI**") Cardholder for about two decades.

2. The Petitioner is associated with the Indian film and entertainment industry as an Actor and also as a film maker through his production house. The Petitioner has earned recognition and established his professional standing solely on the dint of his hard work and sincerity as an Actor. The Petitioner also hails from a family having deep-roots in India.

3. The Petitioner has been registered as an OCI since 2006 under Section 7A(1) of the Citizenship Act, 1955 and has duly complied with his statutory obligations, including the payment of applicable taxes. The Petitioner has led a law-abiding life and has maintained a clean record throughout his personal and professional life. Prior to the OCI, the Petitioner held a PIO card (Person of Indian Origin) until it was discontinued. The Petitioner's established residence, family ties, professional engagements and compliance with applicable laws are relevant circumstances demonstrating his bona fides and roots in India. A copy of the Petitioner's OCI card dated 15.12.2006 is annexed herewith and marked as **Exhibit "A"**. A copy of the

EXHIBIT-A

9

NOTARY GOVT. OF INDIA
AARTI KULKARNI
MUMBAI
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EXPIRY DATE
07.03.2030

SUBJECT OF CHALLENGE

7. The Petition challenges the unconstitutional, illegal, arbitrary, unreasoned and wholly misconceived LIN issued by Respondent No. 2 directing **the Petitioner to leave India on or before 28.10.2026** ("**Impugned Notice**" / "**LIN**"). The Impugned Notice / LIN cites the purported contravention of uncited provisions of the IFA and the Rules and Orders made thereunder. A copy of the LIN issued to the Petitioner by the Respondent No. 2 is annexed herewith and marked as **Exhibit "C"**.

8. The Impugned Notice / LIN which came to be issued in the circumstances more particularly set out below, is manifestly illegal, unconstitutional, arbitrary and even otherwise bad in law, for the reasons more particularly set out below.

BRIEF FACTS

9. The Impugned Notice / LIN does not elaborate upon the fact(s) and/or circumstances which necessitated its issuance. The Petitioner however believes that this is in some way connected with the arbitrary and unjust detention of the Petitioner on 10.10.2026 and/or pursuant



to the large scale media coverage of his presence in the vicinity of the area around August Kranti Maidan, in connection with the protests being organized in the city on the day.

10. Before doing so, the Petitioner wishes to clarify, at the outset, that he has no association, affiliation or connection whatsoever with any organization or institution involved in organizing or mobilising the protest against the incumbent Chief Election Commissioner ("**CEC**") in Mumbai.

11. On 10.10.2026, various student bodies & associations organized protests at various locations across India. The Petitioner came to know about the proposed protests through news reports and social media platforms.

12. On 10.10.2026, the Petitioner, being curious about what was happening on the ground as far as student protesters were concerned, and wanting to see this for himself travelled with his family via the Bandra-Worli Sea Link at around 4:30 p.m. At approximately 5:00 p.m., the Petitioner reached the vicinity of Nana Chowk, Mumbai when he observed that the road leading to August Kranti Maidan had

NOTARY GOVT. OF AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45088 EXPIRY DATE 07.03.2030

been barricaded and that a substantial number of police personnel had been deployed there. He accordingly parked his car several meters away from the barricading and went on to enquire with the police personnel as to the cause of the closure, since apart from police personnel and members of the media, no protesters were present at the location.

13. The police personnel present at the location instructed the Petitioner to leave, as the area was restricted at the time under Orders of the Commissioner of Police. The Petitioner's curiosity ended and he immediately complied with the said directions and proceeded towards his parked vehicle. The police made no further enquires with the Petitioner nor followed him to his vehicle at the time.

14. Whilst the Petitioner was walking towards his vehicle, members of the media recognized him and approached him to seek his views regarding the proposed protest. At this time as well, the Petitioner said nothing objectionable. What he said has been duly recorded and the transcript of his interview with news agency – ANI [Available at: https://x.com/ANI/status/2108899460537291053?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E2108899460537

291053%7Ctwgr%5E87aeb9e988eae c2ddcde3986eb3cdee2cb50284c%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.indiatvnews.com%2Fentertainment%2Fnews%2Fimran-khan-joins-protest-at-mumbai-s-august-kranti-maidan-detained-by-police-aamir-khan-2026-10-10-1056632]

More particularly, Petitioner stated:

> *"I don't have demands. I am here as a citizen, as a person who lives in this city. I am here to see why the freedom of movement is being restricted, why people's voices are being oppressed and suppressed. That's why I am here...meri koi aukaat nahi hai ki main logo se kuch demand karu or na hi mein kisi organization ka hissa hu..."*

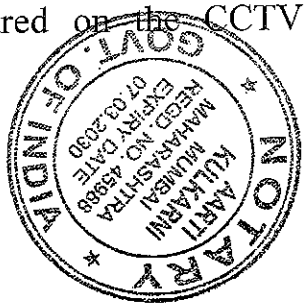
The Petitioner remarked that he was concerned for the students and individuals present there.

15. At approximately 5:19 p.m., while the Petitioner was speaking to the media, police personnel suddenly and in an unprovoked manner apprehended him and placed him, along with his family, in a police vehicle. The Petitioner and his family were thereafter driven around for more than an hour and a half without being informed of the reason for their detention or the destination to which they were being taken.

16. At approximately 7:00 p.m., the Petitioner and his family were taken to Yellow Gate Police Station, Mumbai, where more than 50 police personnel, including senior officers, were present. Upon enquiring about the reasons for his being apprehended, the Petitioner was informed by the senior officers present that they had no instructions in that regard. The Petitioner was subsequently informed that he and his family were free to leave the police station, whereupon they walked out of the premises.

17. After leaving the police station, the Petitioner and his family attempted to hire a cab. However, certain police personnel followed them and intimidated the cab driver, as a result of which the driver refused to take their booking. The Petitioner and his family members were consequently compelled to continue on foot towards *Bhendi Bazar*, crossing the flyover along the way. Thereafter, they managed to arrange transportation and returned home.

18. The Petitioner respectfully states that the foregoing circumstances, including his immediate compliance with the directions of the police personnel and his refraining from entering the barricaded area, stand independently corroborated by footage captured on the CCTV



cameras installed in the vicinity. The contemporaneous record would further establish that no actual acts of protesting were taking place at the location when the Petitioner arrived. At no point did the Petitioner instigate or address any gathering, mobilize any crowd, or engage in any act connected with the proposed protest. The objective electronic record thus conclusively belies any suggestion that the Petitioner was present at the location as a participant, organizer or instigator. The Petitioner relies upon the photographs and relevant social media material, as applicable, in support of his account of the events of 10.10.2026, which he craves leave to produce.

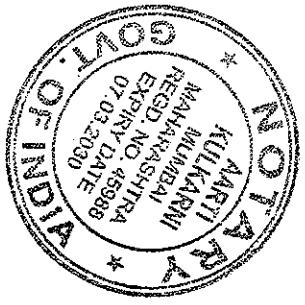
19. To the utter shock of the Petitioner he recently learnt about the registration of an FIR bearing CR No. 0813 of 2026 dated 10.10.2026 under sections 223, 126(2), 189(2), 189(3), 189(5) of the Bharatiya Nyaya Sanhita 2023 registered by the Gamdevi Police Station ("**FIR**"). The only allegation, which is commonly applied to all accused is they had gathered at 3.30 pm at the August Kranti Maidan, and began inciting a crowd of 350 to 400 people (which the Petitioner, based on what he witnessed at the place where he was present, appears to be not factually correct) being in violation of subject offences under the BNS and the order of the Commissioner of Police



issued vide Notification dated 26.08.2025 issued by the Maharashtra Government Gazette. The contemporaneous records will confirm and demonstrate that the Petitioner left through the Bandra Worli Sea Link along with his family only after 4.30 pm to reach Nana Chowk at 5.30 PM. The Petitioner craves leave of this Hon'ble Court to produce and reply upon the copy of the FIR at the time of the hearing, if necessary. A copy of the Notification dated 26.08.2025 issued in the Maharashtra Government Gazette is annexed hereto and marked as **Exhibit "D"**.

20. However, having regard to the nature of the Petitioner's public standing, the media coverage of the Petitioner's presence became widely reported and circulated on social media, and such reporting garnered considerable views. Notably, apart from the remarks made to the media on site on 10.10.2026, as reproduced above, the Petitioner has made no statements in the press or on his social media account.

21. The Petitioner has however learnt that certain political leaders have, on their social media accounts, stated that they had addressed complaints to the police officials seeking registration of FIR,



particularly against the Petitioner, also actively advocated for his expulsion from India.

22. Thereafter, on 15.10.2026 he received the Impugned Notice dated 14.10.2026 of the Respondent No.2, which on the face of it is disproportionate, unsupported and wholly arbitrary. The limited text of the Impugned Notice, which does not record his OCI status, is reproduced hereunder *in toto*:

> *" LEAVE INDIA NOTICE*
>
> *It has come to the notice of the undersigned, that you, Imran Khan Pal, Passport/TD No. 566979012, a United States of America national have contravened the provisions of the Immigration and Foreigners Act, 2025 and the Rules and Orders made thereunder.*
>
> *Therefore, in the exercise of the powers conferred under Section (7) SubSection (2), Clause (c) read with Section (29) of the Immigration and Foreigners Act, 2025 (XII of 2025), the undersigned, being the Foreigners Regional Registration Officer, Mumbai and Civil Authority, in pursuance of the MHA, Govt. of India's Notification Nos. S. 0. 3990 (E) File No. 25022/42/2025-Imm(1) dated 01.09.2025 order that,* ***you shall not remain in India and shall depart from India on or before 28.10.2026****.*
>
> *Non-compliance of this order will render you liable for prosecution under the relevant sections of the Immigration and Foreigners Act, 2025."*

23. The Petitioner states that the issuance of the LIN was publicly celebrated by the very political leaders who had sought coercive

action and his deportation on social media accounts. The extraordinary haste with which the LIN has been issued, within five days of the complaint said to have been made, strongly indicates that it was issued not upon an independent, objective and lawful assessment, but as a purely responsive measure and/or reaction and/or for extraneous reasons. During this interregnum, the Petitioner was served with no notice or summons, informed of no allegation, and afforded no opportunity whatsoever to explain his position.

24. More fundamentally, the LIN conspicuously ignores and makes no reference to the Petitioner's subsisting OCI status, thereby circumventing the statutory safeguards under the Citizenship Act, 1955, and proceeds to inflict the drastic consequence of expulsion without considering the complete and undisputed facts. An order of such grave civil consequence, passed in manifest breach of natural justice and without application of mind, is *ex facie* arbitrary, illegal, unconstitutional and legally unsustainable. It therefore warrants immediate judicial intervention and an immediate interdict, as well. The LIN deserves to be quashed and set aside.

25. Hence, the present Petition.

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GROUNDS

A. That the Impugned Notice is *ex facie* arbitrary, illegal and in contravention of the provisions of the Immigration and Foreigners Act, 2025, as well as of the rights accorded to the Petitioner as an Overseas Citizen of India, under the Constitution or the Citizenship Act, 1955.

B. That it is settled law that the power to remove an individual from India cannot be exercised without giving such individual notice and an opportunity to respond. The Impugned Notice directs the Petitioner to leave Indian without any opportunity to show cause or be heard and, for that reason alone, deserves to be set aside.

C. That the Impugned Notice is bad in law, and *ex facie* arbitrary and capricious. It articulates no cognisable reason for expelling the Petitioner from India. The only purported reason given is that the Petitioner has "*contravened the provisions of the Immigration and Foreigners Act, 2025, and the Rules and Orders made thereunder*." The Impugned Notice fails to identify a single such provision, rule or order that has been allegedly contravened.



D. That the Impugned Notice is vitiated by *mala fides*. The Impugned Notice appears to have been, *inter alia*, prompted by certain political functionaries, claiming that the Petitioner is a foreigner who participated in a political event in India and will have to leave India. It is well settled that the power under any statute must be exercised bona fidely and for a lawful purpose, and not for any collateral or colourable purpose. The attempt to exercise the power under the Immigration and Foreigners Act, 2025 to expel the Petitioner, seemingly at the demand of a political functionary is arbitrary and mala fide, and warrants interference by this Hon'ble Court.

E. That the chronology admits of no other inference. This is borne out by the fact that, on the evening of 10.10.2026, a political functionary, who holds no office under the Immigration and Foreigners Act, 2025, publicly demanded the Petitioner's deportation on the social media platform namely X (formerly known as Twitter). The FIR was registered at 23:30 hours on the same night. On 12.10.2026, the same functionary again demanded the Petitioner's arrest and deportation and announced the action that was to follow. On 14.10.2026, four days after the FIR, with no

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intervening act of the Petitioner and no notice to him, the Impugned Notice was issued. The same functionary then publicly claimed that action had been taken within five days of his raising the issue, and posted a copy of the Impugned Notice on social media with the Petitioner's passport number unredacted.

F. That, in any event, the aforesaid facts also indicate that the Impugned Notice is a colourable exercise of power, and/or based on extraneous considerations and/or for extraneous reasons.

G. That it is settled law that a notice alleging contravention of the Act or the Rules must, at the very least, identify the breach committed by an individual and disclose the material on which the authority has concluded that the individual is in breach. This Hon'ble Court has repeatedly held so. In the present case, the Impugned Notice does not even identify the provision said to have been breached. In the circumstances, the Impugned Notice is no valid notice at all in the eyes of law, is unsustainable, and deserves to be quashed.

H. That an individual lawfully in India cannot be expelled without being informed of the reasons for such expulsion and being afforded

NOTARY GOVT. OF INDIA AARTI KULKARNI MUMBAI MAHARASHTRA REGD NO. 45586 EXPIRY DATE 07.03.2030

an opportunity of being heard. The Petitioner has been afforded neither.

I. That the Authority in question cannot have absolute or unguided power, regardless of whether such power is exercised over a citizen or otherwise.

J. That the only operative recital in the Impugned Notice (viz. that the Petitioner has "contravened the provisions of the Immigration and Foreigners Act, 2025 and the Rules and Orders made thereunder"), merely reproduces the words of Section 29. Merely recanting and mechanically reproducing the words of a statutory provision is not sufficient in law and cannot be countenanced.

K. That the Petitioner, who has lived in India for forty-two years, is apparently sought to be expelled solely because an FIR has been registered. The FIR is at the stage of investigation. The offences alleged under Sections 223, 126(2), 189(2), 189(3) and 189(5) of the Bharatiya Nyaya Sanhita, 2023 are all bailable, and none carries a punishment exceeding two years. No charge-sheet has been filed, no court has taken cognizance, and no charge has been framed. Even if a charge-sheet were to be filed, the Court may decline to take

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cognizance. If it takes cognizance, the Petitioner may be discharged. If charges are framed, he may be acquitted. To expel the Petitioner at the very threshold of that process is to visit the ultimate consequence upon a mere allegation and to condemn him, in effect, on the mere recording by the police of an intimation of the commission of an offence.

L. That the provisions invoked against the Petitioner and/or in the manner done, do not properly apply to the Petitioner, an OCI card holder whose registration subsists. Parliament has enacted a complete and self-contained code for Overseas Citizens of India in Sections 7A to 7D of the Citizenship Act, 1955. That code governs who may be registered (Section 7A) and the rights the Cardholder enjoys (Section 7B). It governs how the status may be renounced (Section 7C). Critically, it fixes the grounds on which, and the manner in which, the status may be taken away (Section 7D): on a specified ground, and only after a reasonable opportunity of being heard. Among the rights conferred under Section 7B is a multiple-entry lifelong visa to visit India for any purpose. An Overseas Citizen of India Cardholder is therefore not an ordinary foreigner of the kind the Immigration and Foreigners Act, 2025 contemplates,



whose presence in India rests on a time-bound visa. He belongs to a distinct statutory class. His right to enter and remain in India flows from, and/or is under, a different legal regime and should properly be ended only under it. The requirement of specified grounds and a hearing are therefore imperative. Reference to the general powers under Sections 7 and 29 of the Immigration and Foreigners Act, 2025 instead of Sections 7A to 7D of the Citizenship Act, 1955 is therefore impermissible and/or (in any event) uncalled for. The Impugned Notice, issued while his registration subsists and in complete disregard of Section 7D, is without jurisdiction and void *ab initio*. The remaining grounds are without prejudice to the foregoing.

M. That, the impugned notice is devoid of reasons and does not disclose and/or ignores undisputed and material facts, presumably based on an unproven FIR.

N. That the Impugned Notice does not consider that on being informed by the police that August Kranti Maidan was closed, the Petitioner immediately turned back and proceeded towards his car. He was detained only because members of the media had gathered around

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him. Every movement of the Petitioner is captured in the CCTV footage of the spot, which is easily accessible to the Respondents and on which they have conspicuously chosen not to rely.

O. That a bare perusal of the impugned Notice reveals that it does not specify the specific provision of the IFA, or of the rules or orders framed thereunder, that the Petitioner is alleged to have contravened. The impugned Notice merely states that the Petitioner has *"contravened the provisions of the Immigration and Foreigners Act, 2025 and the Rules and Orders made thereunder"*. The Notice does not disclose the act or conduct of the Petitioner that constitutes such contravention. The provisions referred to in the second paragraph of the impugned Notice are Section 7(2)(c), Section 29 and MHA Notification S.O. 3990(E) dated 01.09.2025. It is submitted that these provisions only empower the authority to act and do not by themselves, *ipso facto*, impose any obligation on the Petitioner which he could have contravened. Even the exercise of such powers by the Respondent No. 2 is capricious, as dealt with in the succeeding paragraphs. It is therefore submitted that the impugned Notice has been issued presumably on the basis of the FIR

registered on 10.10.2026, which is unproven and is still under investigation.

P. That the impugned Notice is devoid of any reasons and is conclusive in nature, without having recorded adequate consideration of material facts and circumstances relevant to the matter, without even providing a reasonable opportunity to be heard to the Petitioner. It is a settled principle of law that recording reasons is an essential facet of the principles of natural justice. Pertinently, the impugned Notice omits the most material fact relevant to determining whether the Petitioner has contravened any provision of the IFA -that the Petitioner is an Overseas Citizen of India Cardholder, registered under Section 7A of the Citizenship Act, 1955 since 15.12.2006. The impugned Notice refers to the Petitioner merely as a *"United States of America national"*. The Petitioner's OCI status is undisputed and is borne out by the Respondents' own records. It is this status that primarily governs the rights available to the Petitioner and the procedure by which his right of residence in India can be curtailed. The omission of such a material fact demonstrates complete non-application of mind on the part of the Respondent No.

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2, and the impugned Notice is liable to be quashed and set aside on this ground alone.

Q. That assuming without admitting that the alleged contravention arises out of the allegations made in the FIR, the same admittedly does not include offences under the IFA. All the offences alleged in the FIR, namely under Sections 223, 126(2), 189(2), 189(3) and 189(5) of the Bharatiya Nyaya Sanhita, 2023, are bailable offences, and none of them is an offence or contravention under the IFA. The FIR is at the stage of investigation; no charge-sheet has been filed and no court has taken cognizance of any offence against the Petitioner.

R. That an FIR is a mere allegation and the Petitioner is presumed innocent until proven guilty. The Respondent No.2 cannot act on suspicion, conjecture or unproven allegations, much less treat the mere registration of an FIR as conclusive proof of a contravention of the IFA to order the harshest penalty against the Petitioner, that too in exercise of arbitrary power.

I. THE IMPUGNED LIN CIRCUMVENTS THE STATUTORY PROTECTION OF THE PETITIONER'S OCI STATUS

S. That the Petitioner is registered as an OCI Cardholder under Section 7A of the Citizenship Act, 1955, and is not an ordinary foreigner on a time-bound visa. OCI registration confers a lifelong, multiple-entry right of entry into and residence in India, together with the rights notified under Section 7B(1) thereof. Section 7B(2) excludes only a limited set of rights, which are those under Article 16, eligibility for high constitutional offices, registration as a voter, membership of a legislature, and appointment to public services. None of these exclusions restricts the Petitioner's presence at a public place.

T. That the expression "Overseas Citizen of India" is not an empty label. By the Citizenship (Amendment) Act, 2015, Parliament abolished the Person of Indian Origin scheme and merged it into the OCI scheme, thereby creating a single, distinct and privileged class of persons of Indian origin who share an enduring bond with India. The Legislature, in its wisdom, consciously chose this nomenclature. It placed the grant, rights and cancellation of OCI



status in a self-contained code under Sections 7A to 7D of the Citizenship Act, 1955, instead of leaving them to the general law governing foreigners. An OCI Cardholder therefore cannot be equated with a tourist or a holder of a visa.

U. That Section 7D of the Citizenship Act, 1955 exhaustively enumerates the grounds on which OCI registration may be cancelled. Moreover, the scheme thereunder includes procedural safeguards for exercise of the said power as it mandates that no such order shall be passed unless the cardholder has been given a reasonable opportunity of being heard.

V. That the impugned LIN, by directing the Petitioner to leave India, without even granting him an opportunity to respond to the Notice, either by way of writing or a personal hearing, renders the Petitioner's lifelong right of residence and his OCI status illusory.

W. That assuming without admitting that it would be the case of the Respondents that the IFA does not set out any procedure for exercise of its power, it is submitted that it is trite law that even if a statue does not provide for a procedure for exercise of power, such a



procedure can be introduced into the spirit of the statute itself, to effectuate the Constitution of India in letter as well as in spirit.

II. NO CONTRAVENTION OF ANY PROVISION OF THE IFA

X. That the impugned LIN is issued under Section 7(2)(c) read with Section 29 of the IFA which empowers the Central Government to direct the removal of a foreigner only upon the existence of one of two foundational facts –(i) The first is a contravention of the provisions of the IFA or of any rule or order made thereunder and (ii) the second is an adverse security report. Neither exists in the present case, and neither is recorded in the impugned LIN. A power conditioned on the existence of a foundational fact cannot be exercised in its absence.

Y. That Section 20 of the IFA defines what constitutes a contravention of the Act. It is confined to contravening, attempting to contravene, abetting or doing any act preparatory to the contravention of the provisions of the IFA, or of any rule, order or direction made or given thereunder, or failing to comply with a direction issued pursuant to such order. Under Section 2(l) of the IFA, an "order"

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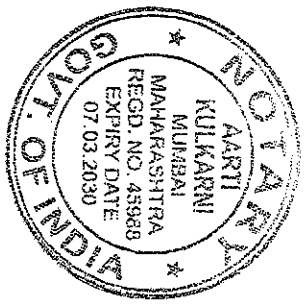
means instructions issued under the provisions of the IFA or the rules made thereunder.

Z. That without prejudice to the above, and assuming that there is a connection between the Impugned Notice and the Public Meetings, Agitations and Processions Rules, 2025, notified on 26.08.2025 by the Commissioner of Police, Mumbai under the Maharashtra Police Act, 1951 (the "**Notification**"), it is submitted that the said Notification is not an order under the IFA. Its breach, even if alleged and proved, cannot constitute a contravention within the meaning of Section 20, for the reasons set out below.

AA. That notwithstanding the fact that the impugned LIN fails to specify the particular provision of the IFA, or of any rules or orders framed thereunder that the Petitioner is alleged to have violated, and even if the allegations in the FIR are taken at their highest, they may at best give rise to a presumable violation of Section 11 of the IFA, which has no relation to engaging in protests, rallying or being present at such locations. Even so, the impugned LIN does not identify any such statutory contravention or set out the specific circumstances



warranting its issuance. For ready reference, Section 11 of the IFA is reproduced below:

> *"**11. Visit to Protected or Restricted area or Prohibited places.**— No foreigner shall enter or stay in Protected area or Restricted area or Prohibited place without a special permit or permission granted by such authority as may be specified by an order published in the Official Gazette in this behalf and subject to such conditions as specified therein."*

BB. That under Sections 2(p), 2(q) and 2(s) of the IFA, a *"Prohibited place", "Protected area"* and *"Restricted area"* are each such place or area as the Central Government may, *by order*, specify in that behalf.

CC. That Section 15, Chapter V of the Immigration and Foreigners Order, 2025 notified vide Noti. No. S.O. 3216(E), dt. 18-6-2026 adopts the meaning of "prohibited place" under Section 2(8) of the Official Secrets Act, 1923, the relevant part of which reads as follows:

> *"(8) prohibited place means— ... (c) any place belonging to or used for the purpose of Government which is for the time being **declared by the Central Government, by notification in the Official Gazette, to be a prohibited place** for the purposes of this Act ...; (d) any railway, road, way or channel, or other means of communication by land or water ... which is for the time being **declared by the Central Government, by notification in the Official Gazette, to be a prohibited place** for the purposes of this Act ..."*

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DD. That a bare perusal of the aforesaid provisions makes it evident that a place can be designated a "prohibited place" only upon the issuance of a notification by the Central Government. No such notification has been brought on record to demonstrate that Nana Chowk or August Kranti Maidan in the city of Mumbai has been so designated. In the absence of any such notification, the essential statutory precondition for invoking Section 11 of the IFA remains unfulfilled. Its invocation against the Petitioner to justify the exercise of power under Section 29 would therefore be legally untenable and devoid of any sustainable basis.

EE. That no order under Section 7(2)(f)(vii) or (viii) of the IFA, prohibiting the Petitioner from associating with persons of a specified description or from engaging in activities of a specified description, has ever been made. Nor is there any violation of the conditions attached to the Petitioner's OCI registration. MHA Notification S.O. 1050(E) dated 04.03.2021 requires an OCI Cardholder to obtain special permission only for research, missionary or tabligh activities, mountaineering, journalistic activities, engagement with foreign diplomatic missions, and visits



to protected, restricted or prohibited areas (as notified by Central government).

III. THE IMPUGNED NOTICE IS IN THE TEETH OF ARTICLE 14 OF THE CONSTITUTION OF INDIA, 1950

FF. That the right to equality is the very essence of the constitutional philosophy enshrined in the Constitution of India, 1950. The guarantee of equality before the law and equal protection of the laws is indispensable to ensure that every individual is treated fairly, impartially and without any arbitrary or discriminatory exercise of power. Such a guarantee cannot be sacrificed at the altar of administrative discretion, executive expediency or arbitrary decision-making. Article 14 of the Constitution of India reads as follows:

> *"Article 14: The State shall not deny to **any person** equality before the law or the equal protection of the laws within the territory of India."*

GG. That the protection guaranteed under Article 14 extends to the Petitioner irrespective of his citizenship status, inasmuch as the provision expressly employs the words "any person" and not "any citizen". It is a settled principle of constitutional law that this

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guarantee is available to every person within the territory of India. The Petitioner is therefore constitutionally entitled to seek redress against any arbitrary, unreasonable or discriminatory State action.

HH. That the equalising principle evolved as an anathema to arbitrariness through the celebrated ruling of the Hon'ble Supreme Court in *E.P. Royappa v. State of Tamil Nadu*, (1974) 4 SCC 3. The Apex Court there held that State action reeking of arbitrariness strikes at the very heart of Article 14. The principle was further extended in *Ajay Hasia v. Khalid Mujib Sehravardi*, (1981) 1 SCC 722.

II. That the impugned LIN is manifestly arbitrary, unreasonable, unjust and unsustainable in law. A bare perusal of its contents reveals that it is vague, generic and non-speaking in nature, inasmuch as it fails to disclose any specific ground, circumstance or activity that necessitated its issuance against the Petitioner. The only purported basis discernible from the LIN is an alleged violation of the provisions of the IFA and the rules and orders made thereunder. A bare reproduction of the language of Section 29 is no substitute for reasons.

JJ. That such vague and unsubstantiated assertions fail to afford the Petitioner any meaningful understanding of the basis on which the impugned LIN has been issued. It is settled law that the validity of an order must be judged by the reasons stated in the order itself, and those reasons cannot be supplemented by fresh reasons in the form of affidavits or otherwise: *Mohinder Singh Gill v. Chief Election Commissioner*, (1978) 1 SCC 405. The Respondents cannot now invoke the FIR, or any other material, to fill the void in the impugned LIN.

KK. That the non-application of mind is writ large on the face of the impugned LIN. It describes the Petitioner merely as a "*United States of America national*" and entirely ignores his OCI registration. It describes the IFA as "*XII of 2025*", although the IFA is Act No. 13 of 2025. It is a printed, template-style notice in which only the Petitioner's particulars have been filled in. An order of such grave consequence, passed in such mechanical a manner, strikes at the very heart of Article 14.

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IV. THE IMPUGNED LIN FAILS TO SATISFY THE RIGOURS OF ARTICLE 21 OF THE CONSTITUTION OF INDIA, 1950

LL. That the Hon'ble Supreme Court in *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248, held that the procedure contemplated under Article 21 must be fair, just and reasonable, and not arbitrary, fanciful or oppressive. The rule of *audi alteram partem*, which embodies the fundamental principle that no person shall be condemned unheard, is an essential safeguard against arbitrary State action and an integral facet of the procedural guarantee under Article 21, even if such safeguards are not expressly stated in the statute.

MM. That the protection of Article 21 is not confined to citizens. The provision expressly stipulates that "no person shall be deprived of his life or personal liberty except according to procedure established by law". The Petitioner is therefore constitutionally entitled to insist that any State action affecting his personal liberty and continued residence in India adheres to a fair, just and reasonable procedure.

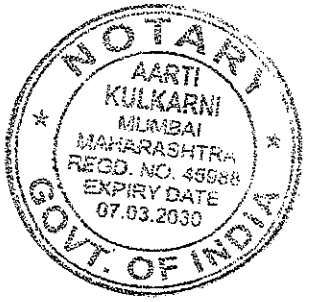


NN. That the Petitioner cannot be expelled from India by a mere stroke of the pen without a reasonable and effective opportunity of being

heard. This requirement assumes even greater significance in the present case, since the Petitioner has resided in India for the last 42 years and lives here with his family and child. He is gainfully employed in India and earns his livelihood here. These are material circumstances that ought to have been considered before any coercive action affecting his continued stay was taken.

OO. That the Respondents, in the interest of fairness and in adherence to the principles of natural justice, ought to have issued a show-cause notice to the Petitioner setting out the grounds for the proposed action. They ought then to have afforded him an effective opportunity to furnish his explanation before passing the impugned LIN. No such notice was issued. The impugned LIN was passed within four days of the FIR, without the Petitioner being asked a single question. This failure has deprived the Petitioner of any meaningful opportunity to address the allegations forming the basis of the LIN, in violation of Articles 14 and 21.

PP. That it has been time and again held by various High Court's and the Supreme Court that that even in matters concerning the



expulsion of foreign nationals, the principles of natural justice apply and where the statute prescribes no procedure, a basic procedure must be read into it, and no person can be expelled without an opportunity of being heard, especially prior to issuance of a Leave India Notice. Moreover, Courts have also clarified that no statute debars any person from mere presence at, or participation in, a rally or protest.

V. THE IMPUGNED NOTICE IS NOT AN OUTCOME OF INDEPENDENT APPLICATION OF MIND BUT A MECHANICAL RESPONSE AND/OR REACTION TO A COMPLAINT AND/OR AN FIR

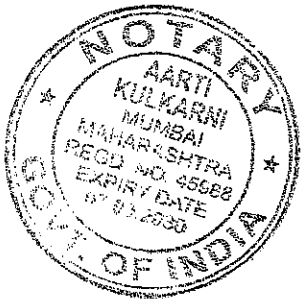
QQ. That the sequence of events leaves no manner of doubt that the impugned LIN is not the outcome of any independent statutory satisfaction or independent application of mind. On the evening of 10.10.2026, a certain political functionary, publicly demanded on X (formerly Twitter) that the Petitioner be deported immediately. He also wrote to the Joint Commissioner of Police and spoke with Gamdevi Police Station. The FIR was registered at 11:30 PM that very night. On 12.10.2026, he publicly demanded the Petitioner's



arrest and deportation and announced in advance the police action that was to follow. On 14.10.2026, the impugned LIN was issued. The same political leader then publicly claimed that action had been taken within five days of his raising the issue and went on to leak a copy of the Impugned LIN on his social media account, without redacting the personal sensitive information of the Petitioner-being his passport number. The petitioner craves leave to rely upon and produce copies of the said publications as and when necessitated.

RR. That the Respondents thus have appeared to have acted at the behest of , and on the timetable, of a political functionary who holds no office under the IFA, which has been admitted by the said person himself and is apparent due to the fact that there was no other intervening circumstance or act by the Petitioner.

SS. That a statutory power exercised at the behest of a third person, or for a purpose other than the legislative intent, is vitiated by malice in law and constitutes an arbitrary exercise of power. The power of removal under Section 29 exists to safeguard the sovereignty and security of the nation. It cannot be converted into an instrument for



punishing a public figure for his mere presence near a protest site, or for silencing him for voicing a concern about restrictions on the free movement of the people of this city.

TT. That the arbitrary expulsion, without reasons or hearing and on the basis of a demonstrably false FIR, of a natural-born citizen of the United States of America who has lived in India since infancy carries consequences far beyond the Petitioner. It would undermine the confidence of the Indian diaspora in the United States, one of the largest bodies of OCI Cardholders, in the certainty of the OCI regime. It would also invite legitimate concern from a friendly foreign State whose national has been removed without due process. Adherence to the rule of law in matters of residence and immigration is integral to India's standing among nations and cannot be sacrificed at the altar of personal vendetta.

VI. THE IMPUGNED NOTICE IS GROSSLY DISPROPORTIONATE AND CAUSES IRREPARABLE PREJUDICE TO THE PETITIONER



UU. That assuming for the sake of argument without admitting, that allegations against the Petitioner are true, the consequence imposed by the impugned LIN is wholly disproportionate. The Petitioner has been a resident of India for over four decades. His alleged conduct is a brief presence near a site from which he was turned away, after which he was released the same evening. For this, he is sought to be uprooted from India altogether, without any lesser measure even being considered. Such action fails the triple test of proportionality laid down and reaffirmed by the Supreme Court, time and again.

VV. That the principles of proportionality dictate that (i) the measures adopted must be rationally connected to the objective. (ii) the means should impair "as little as possible" the right or freedom in question and (iii) there must be a proportionality between the effects of the measures which are responsible for limiting the Charter right or freedom, and the objective which has been identified as of *"sufficient importance"*. The more deleterious effects of a measure, the more important the objective must be if the measure is to be reasonable and demonstrably justified in a free and democratic society. The exercise which, therefore, to be taken is to find out as

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to whether the limitation of constitutional rights is for a purpose that is reasonable and necessary in a democratic society and such an exercise involves ultimately an assessment based on proportionality i.e. balancing of different interests, which the Respondents in the humble submission of the Petitioner, has failed to do.

WW. That the Petitioner will suffer grave and irreparable prejudice if the impugned LIN is not stayed. He will be separated from his parents and children and deprived of his home and livelihood in India. He will be exposed to blacklisting and denial of re-entry and will bear the stigma of expulsion without any finding of wrongdoing. Non-compliance would expose him to prosecution under Section 23(b) of the IFA, while compliance by 28.10.2026 would render the present Petition infructuous. Since no security concern, urgency or public interest is disclosed, the balance of convenience lies entirely in favour of the Petitioner.



26. In light of the above, the Petitioner submits that he has made out a strong prima facie case for the grant of ad-interim relief. The impugned Notice does not disclose any provision of the IFA

alleged to have been contravened and is devoid of reasons. It has been issued without any show-cause notice or opportunity of hearing, and in complete disregard of the Petitioner's undisputed status as an OCI. The only material on which the impugned Notice is presumably based is an unproven FIR registered on 10.10.2026.

27. It is submitted that the impugned Notice directs the Petitioner to leave India on or before 28.10.2026. If ad-interim relief is not granted, the Petitioner, who has resided in India since the age of about two years, will be compelled to leave the country, his home, his family and his livelihood. Such loss cannot be compensated in terms of money or otherwise, and the present Petition itself would be rendered infructuous. On the other hand, the Respondents have not disclosed any security concern or urgency in the impugned Notice, and no prejudice whatsoever will be caused to them if the impugned Notice is stayed pending the hearing and final disposal of the present Petition. The balance of convenience is therefore entirely in favor of the Petitioner. The Petitioner has no alternate efficacious remedy under the law.



28. The Respondent No. 2 has its offices within the territorial jurisdiction of this Hon'ble Court. Hence, the cause of action underlying the present Petition has also arisen within the territorial jurisdiction of this Hon'ble Court. Thus, the Petitioner submits that this Hon'ble Court has the territorial jurisdiction to adjudicate the present Petition.

29. The Petitioner has not filed any other appeal, application, revision or petition either in this Hon'ble Court or in the Hon'ble Supreme Court of India touching the subject matter of this Petition.

30. The Petitioner states that the instant petition is not barred by limitation.

31. The Petitioner will rely upon documents as identified above; a list whereof is annexed hereto.

32. The Petitioner has paid the requisite Court Fees on the Petition.

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33. The Petitioner craves leave to add, alter, amend and/or modify of any of the contentions, averments or grounds raised in the present Petition.

34. In light of the above facts and circumstances, the Petitioner humbly prays that this Hon'ble Court may be pleased to allow the present Petition as per the following:

A. To issue a writ of certiorari, or a writ in the nature of certiorari, or any other appropriate writ, order or direction under Article 226 of the Constitution of India, quashing and setting aside the impugned Leave India Notice bearing O.W. No. FRRO/BOI/MUM/REG/2026-4250 dated 14.10.2026 issued by the Respondent No. 2;

B. Pass such further or other order(s), as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case and in the interests of justice, equity and fair play.

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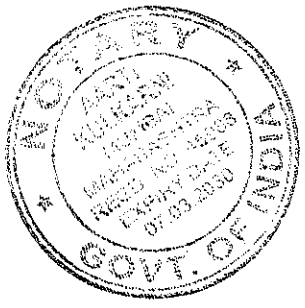
35. In light of the above-mentioned facts and circumstances, pending the hearing and final adjudication of the present Petition, the Petitioner humbly prays that the Hon'ble Court be pleased to:

A. Direct the Respondent No. 2 to produce and make an adequate disclosure of the records and proceedings that led to the issuance of the impugned Leave India Notice bearing O.W. No. FRRO/BOI/MUM/REG/2026-4250 dated 14.10.2026, including all material relied upon therein.

B. Stay the operation, implementation and effect of the impugned Leave India Notice dated 14.10.2026, and restrain the Respondents, their officers, servants and agents from taking any coercive steps against the Petitioner pursuant thereto including but not limited to the removal or deportation from India, blacklisting, or any action in relation the Petitioner's registration as an Overseas Citizen of India Cardholder;

C. grant ad-interim relief in terms of prayer clause 35(A) & (B) above;



D. Pass any other order(s) as this Hon'ble Court may deem fit and proper under the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY

DATE:

PLACE: MUMBAI

APPLICANT

MZM LEGAL LLP

ADVOCATE FOR THE APPLICANT

VERIFICATION

I, Mr. Imran Khan Pal, Aged about 44 years, holding USA Passport No. (55597012) and OCI Certificate of Registration No. (085019), currently residing at Clefepete building 9th Floor, Carter Road Bandra West, Mumbai - 400050 do hereby state and solemnly declare that whatever is stated in the paragraphs No. 1 to 25 is true and correct to the best of my knowledge and from paragraphs No. 26 to 35 is based upon the information and advice and I believe the same to be true.

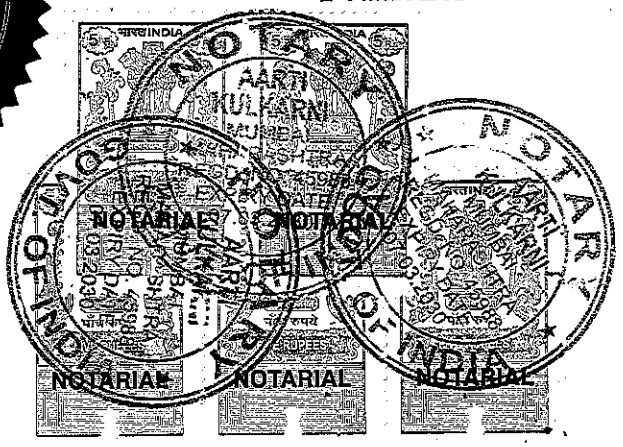
Solemnly declared at Mumbai)

Dated this 17th day of October 2026)

NOTARY GOVT. OF INDIA AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030

Imran Khan Pal

Petitioner



Explained by
KJ Sharadwal
Advocates for the Petitioner

MZM Legal LLP

Level Six, Sixth Floor, One Forbes,

Dr. VB Gandhi Marg, Kala Ghoda,

Fort, Mumbai- 400001

BEFORE ME
Kulkarni
AARTI KULKARNI
NOTARY (GOVT. OF INDIA)
HIGH COURT, MUMBAI
702 Shree CHSL Paranjape A Scheme Road No. 1,
Opp. Parleshwar Post Office Subhas Road,
Vile Parle (East), Mumbai - 400 057.

NOTED & REGISTERED
Sr. No. 416 Page No. 46
Dated 17/10/2026

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IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

WRIT PETITION (OS) NO. _____OF 2026

DISTRICT: - MUMBAI

IMRAN KHAN PAL)
Aged about 44 years, holding USA Passport No.)
(55597012) and OCI Certificate of Registration)
No. (085019), currently residing at Clefepete)
building 9th Floor, Carter Road Bandra West,)
Mumbai **... PETITIONER**

VERSUS

1. UNION OF INDIA)
Through the Secretary, Ministry of Home Affairs)
(MHA), North Block, Central Secretariat, New)
Delhi - 110001. **... RESPONDENT NO. 1**

2. FOREIGNERS REGIONAL REGISTRATION OFFICER (FRRO))
78/1, Badruddin Tayabji Marg,)
behind st.xevier collage, Dhobi Talao,)
Chhatrapati Shivaji Terminus Area Fort Mumbai,)
Maharashtra-400001) **... RESPONDENT NO. 2**

To,

The Prothonotary & Senior Master

High Court (Original Side),

Bombay.

Sir,

I, Imran Khan Pal, Aged about 44 years holding USA Passport No. (55597012) and OCI Certificate of Registration No. (085019), currently residing at Clefepete building 9th Floor, Carter Road Bandra West, Mumbai, above named, do hereby appoint MZM Legal, Advocates, High Court, Mumbai, to act, appear and plead on our behalf in the above matter.

In witness whereof we have hereto and hereunto set and subscribed our hands to this writing at Mumbai, this day of October 2026.

Adv. Mahesh Ahire
MAH/646/2015

Rohit

ACCEPTED:

K Bharadwaj
Kshemendra Bharadwaj
D/3799/2024

MAH/2644/2026
Vayayarti S

Imran Khan Pal
Petitioner
[Imran Khan]

MZM LEGAL

Advocates,
Level 6, One Forbes,
Dr. V. B. Gandhi Marg,
Kalaghoda, Mumbai, 400001, India
Tel: +91 22 22643333/6666
lawyers@mzmlegal.com
Advocate Code: I-1778
OS Registration No: ~~10245~~/2008
10249
MAH/10/LF/2017

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL JURISDICTION

WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT:- MUMBAI

MEMORANDUM OF ADDRESS

Imran Khan Pal

Currently residing at Clefepete building, 9th Floor, Carter Road, Bandra West, Mumbai

or

MZM LEGAL

Level 6, One Forbes, Dr. V.B.Gandhi Marg,

Kalaghoda, Mumbai 400001.

+91 22-22643333/6666

Advocates for the Petitioner

MZM Legal

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL JURISDICTION

WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT: - MUMBAI

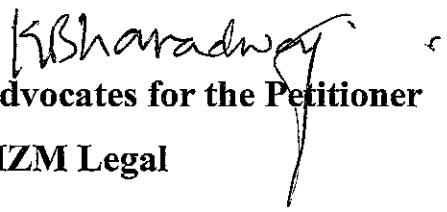
IMRAN KHAN PAL **...PETITIONER**

VERSUS

UNION OF INDIA & ANR. **...RESPONDENTS**

LIST OF DOCUMENTS

SNo.	Exhibit	Particulars	Page Nos.
1.	"A"	Copy of the Petitioner's Overseas Citizen of India ("**OCI**") Certificate of Registration bearing No. 085019 dated 15.12.2006.	62
2.	"B"	Copy of Petitioner holding USA Passport No. 566979012 dated 30.05.2019.	63
3.	"C"	Copy of Leave India Notice dated 14.10.2026 issued to the Petitioner by Respondent No. 2.	64
4.	"D"	Copy of Notification dated 26.08.2025 issued in the Maharashtra Government Gazette.	65-97

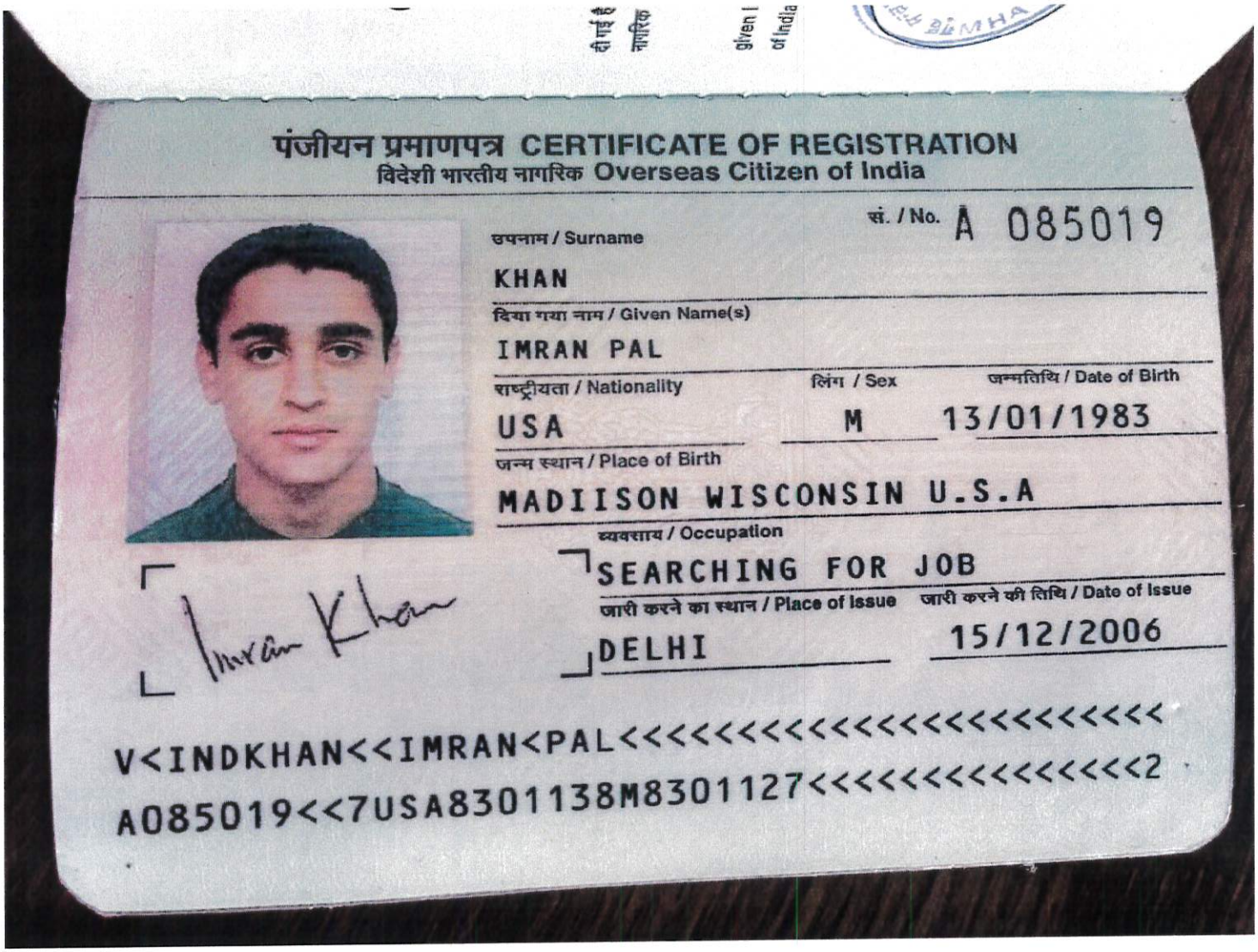


Advocates for the Petitioner

MZM Legal

NOTARY AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030 GOVT. OF INDIA

EXHIBIT – A



पंजीयन प्रमाणपत्र CERTIFICATE OF REGISTRATION
विदेशी भारतीय नागरिक Overseas Citizen of India

सं. / No. A 085019

उपनाम / Surname
KHAN

दिया गया नाम / Given Name(s)
IMRAN PAL

राष्ट्रीयता / Nationality
USA

लिंग / Sex
M

जन्मतिथि / Date of Birth
13/01/1983

जन्म स्थान / Place of Birth
MADIISON WISCONSIN U.S.A

व्यवसाय / Occupation
SEARCHING FOR JOB

जारी करने का स्थान / Place of issue
DELHI

जारी करने की तिथि / Date of Issue
15/12/2006

V<INDKHAN<<IMRAN<PAL<<<<<<<<<<<<<<<<<<<<<<<<
A085019<<7USA8301138M8301127<<<<<<<<<<<<<<2

TRUE COPY

NOTARY AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030 GOVT. OF INDIA

NOTARY AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030 GOVT. OF INDIA

EXHIBIT - B



TRUE COPY

EXHIBIT -C

Office of the Foreigners Regional Registration Officer, Mumbai

O.W. No. FRRO/BOI/MUM/REG/2026-4250 ***Date: 14/10/2026***

LEAVE INDIA NOTICE

It has come to the notice of the undersigned, that you, ***Imran Khan Pal***, Passport/TD No. **566979012**, a **United States of America** national have contravened the provisions of the Immigration and Foreigners Act, 2025 and the Rules and Orders made thereunder.

Therefore, in the exercise of the powers conferred under Section (7) Sub-Section (2), Clause (c) read with Section (29) of the Immigration and Foreigners Act, 2025 (XII of 2025), the undersigned, being the Foreigners Regional Registration Officer, Mumbai and Civil Authority, in pursuance of the MHA, Govt. of India's Notification Nos. S.O. 3990 (E) File No. 25022/42/2025-Imm(1) dated 01.09.2025 order that, you shall not remain in India and shall depart from India on or before **28.10.2026**.

Non-compliance of this order will render you liable for prosecution under the relevant sections of the Immigration and Foreigners Act, 2025.

FRRO, Mumbai 14/10

To,
Imran Khan Pal
Passport / TD No: **566979012**
Nationality: **United States of America**
Address in India: **24 Pali Hill, Nargiss Dutt Road, Bandra West, Mumbai(City), Maharashtra - 400050**

Copy to:
1. The Commissioner of Police, Mumbai

TRUE COPY

NOTARY GOVT. OF INDIA AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030

17/10/2026

EXHIBIT - D

RNI No. MAHBIL /2009/35527

NOTARY GOVT. OF INDIA AARTI KULKARNI MUMBAI MAHARASHTRA REGD. NO. 45988 EXPIRY DATE 07.03.2030

सत्यमेव जयते

महाराष्ट्र शासन राजपत्र

असाधारण भाग चार-क

वर्ष ११, अंक ३०] मंगळवार, ऑगस्ट २६, २०२५/भाद्रपद ४, शके १९४७ [पृष्ठे ३३, किंमत : रुपये ९.००

असाधारण क्रमांक ४५

प्राधिकृत प्रकाशन

महाराष्ट्र शासनाव्यतिरिक्त इतर वैधानिक प्राधिकाऱ्यांनी तयार केलेले

(भाग एक, एक-अ व एक-ल यांमध्ये प्रसिद्ध केलेले वैधानिक नियम व आदेश यांव्यतिरिक्त इतर)

वैधानिक नियम व आदेश; यात भारत सरकार, उच्च न्यायालय, पोलीस आयुक्त, आयुक्त (राज्य उत्पादन शुल्क), जिल्हादंडाधिकारी व निवडणूक आयोग, निवडणूक न्यायाधिकरण, निवडणूक निर्णय अधिकारी व निवडणूक आयोगाखालील इतर प्राधिकारी यांनी तयार केलेले वैधानिक नियम व आदेश यांचा समावेश होतो.

पोलीस आयुक्त, बृहन्मुंबई

क्रॉफर्ड मार्केट समोर, मुंबई ४०० ००१, दिनांक २६ ऑगस्ट २०२५.

अधिसूचना

महाराष्ट्र पोलीस अधिनियम.

क्रमांक पोउआ/अभियान/३०३५/२०२५.—ज्याअर्थी, महाराष्ट्र पोलीस अधिनियम (१९५१ चा २२) याच्या कलम ३३ च्या पोट-कलम (१) चे खंड (ओ) आणि पोट-कलम (६) चे परंतुक याद्वारे प्रदान केलेल्या अधिकारांचा आणि याबाबतीत त्यास समर्थ करणाऱ्या इतर सर्व अधिकारांचा वापर करून, पोलीस आयुक्त, बृहन्मुंबई शासनाची पूर्व मंजुरी मिळाविल्यानंतर आणि असे नियम तात्काळ अंमलात आणणे आवश्यक व्हावे अशी परिस्थिती अस्तित्वात असल्याबद्दल खात्री पटल्यावर, याद्वारे, पुढील नियम करीत आहे :—

१. संक्षिप्त नाव, विस्तार व प्रयुक्ती.- (१) या नियमांस, जाहीर सभा, आंदोलने व मिरवणुका (अपर पोलीस आयुक्त, दक्षिण विभाग, मुंबई यांच्या अधिकार क्षेत्रात) नियम, २०२५, असे म्हणावे.

(२) ते, अपर पोलीस आयुक्त, दक्षिण विभाग, मुंबई यांच्या प्रादेशिक अधिकार क्षेत्राला लागू असतील.

(३) ते, अपर पोलीस आयुक्त, दक्षिण विभाग, मुंबई यांच्या अधिकार क्षेत्रात आयोजित करण्यात येणाऱ्या, -मग ते कोणत्याही नावाने संबोधले जात असो,- अशा सर्व जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे आंदोलन, मेळावे व मिरवणुका यांना लागू असतील:

परंतु, या नियमांच्या तरतुदी, शासकीय कार्यक्रम, पारंपरिक किंवा धार्मिक मिरवणुका, क्रीडा विषयक उपक्रम, शैक्षणिक जागृती कार्यक्रम, विवाह, अंत्यविधी, बदिस्त सभागृहातील कार्यक्रम आणि तत्सम उपक्रम यांना लागू असणार नाहीत.

२. व्याख्या.- (१) या नियमांमध्ये, संदर्भानुसार दुसरा अर्थ आवश्यक नसेल तर,-

(एक) "अधिनियम" याचा अर्थ, महाराष्ट्र पोलीस अधिनियम (१९५१ चा २२), असा आहे;

(दोन) "आंदोलन" याचा अर्थ, कोणत्याही राजकीय किंवा सामाजिक कारणासाठी किंवा सिद्धांतासाठी कोणत्याही व्यक्तीने किंवा व्यक्तींच्या गटाने जनतेसमोर युक्तिवाद, वादविवाद, सतत आग्रह किंवा जोरदार युक्तिवाद करून मार्गदर्शन करण्याची कृती किंवा प्रक्रिया, असा आहे;

TRUE COPY

(तीन) "पोलीस आयुक्त" याचा अर्थ, अधिनियमाच्या कलम ७ च्या खंड (अ) अन्वये पोलीस आयुक्त म्हणून नियुक्त केलेला पोलीस अधिकारी, असा आहे;

(चार) "निदर्शने" याचा अर्थ, कोणत्याही सामाजिक, राजकीय किंवा सार्वजनिक धोरणात्मक मुद्द्यांकडे लक्ष वेधण्याच्या प्रयोजनांसाठी विचार व मते व्यक्त करण्याच्या किंवा त्यांच्या भावना, मते, श्रद्धा सार्वजनिकरित्या व्यक्त करण्याच्या किंवा धरणे आंदोलन करण्याच्या दृष्टीने, मार्ग, रस्ते, चौक, पदपथ किंवा रहदारीसाठी रचना केलेल्या इतर क्षेत्रांवर (पादचाऱ्यांसाठी, वाहनांसाठी किंवा अन्यथा) आयोजित केलेली संघटित केलेली जन चळवळ, असा आहे, आणि त्यात, उपरोक्त प्रयोजनासाठी अशा लोकांच्या सामुदायिक संमेलनाचा देखील समावेश होतो;

(पाच) "पदनिर्देशित अधिकारी' याचा अर्थ, विनिर्देशित क्षेत्रावर अधिकारिता असलेल्या संबंधित पोलीस ठाण्याचा वरिष्ठ पोलीस निरीक्षक आणि या नियमांच्या प्रभावी अंमलबजावणीसाठी पोलीस आयुक्त, बृहन्मुंबई हे, या बाबतीत नियुक्त करतील असा कोणताही अधिकारी, असा आहे;

(सहा) "धरणे" याचा अर्थ, मागणी मान्य होईपर्यंत संबंधित प्राधिकाऱ्याच्या दारात बसून किंवा गर्दी करून आणि आमरण उपोषण, बेकायदा प्रवेश, बैठे आंदोलन, इत्यादी विविध मार्गांचा वापर करून सक्तीने अनुपालन करवून घेण्याची किंवा न्याय मिळविण्याची पध्दती, असा आहे;

(सात) "मोर्चा" याचा अर्थ, एखादा विशिष्ट विचार, मागणी, हितसंबंध, मुद्दा किंवा राजकीय पक्ष यास पाठिंबा देण्यासाठी आयोजित केलेली मोठी जाहीर सभा किंवा पदयात्रा (अनेक लोकांनी आयोजित केलेली पदयात्रा), असा आहे;

(आठ) "बृहन्मुंबई महानगरपालिका" याचा अर्थ, मुंबई महानगरपालिका अधिनियम (१८८८ चा ३) अन्वये घटित केलेली बृहन्मुंबई महानगरपालिका, असा आहे;

(नऊ) "गोंगाट करणारे उपकरण" याचा अर्थ, ध्वनिक्षेपक, लाऊडहेलर, मेगाफोन, प्रवर्धक (ॲम्प्लिफायर), विद्युत किंवा इलेक्ट्रॉनिक किंवा डिजिटल ध्वनिमुद्रक आणि परवानगी असलेल्या डेसिबलपेक्षा अधिक आवाजाचे कोणतेही पारंपरिक उपकरण, असा आहे, आणि त्यात त्यांचा समावेश होतो;

(दहा) "धरणे आंदोलन" याचा अर्थ, ज्या कार्यक्रमामध्ये एखादी व्यक्ती किंवा अधिक व्यक्ती, फलक(बॅनर), घोषणा, पत्रक किंवा इतर माध्यमांचा वापर करून सार्वजनिक ठिकाणी राजकीय, आर्थिक व सामाजिक स्वरूपाच्या सामाजिकदृष्ट्या महत्त्वाच्या विविध मुद्द्यांवर विचार व मते व्यक्त करतात, परंतु ज्यामध्ये कोणतीही भाषणे किंवा सार्वजनिक अभिभाषणे केली जात नाहीत, असा कार्यक्रम, असा आहे;

(अकरा) "जाहीर सभा" याचा अर्थ, सार्वजनिक हिताच्या बाबींवर किंवा विविध महत्त्वाच्या सामाजिक, राजकीय किंवा आर्थिक बाबींवर चर्चा करण्याच्या प्रयोजनासाठी किंवा त्यांचे विचार व्यक्त करण्याच्या प्रयोजनासाठी कोणतीही सभा, संमेलन किंवा जन सभा, -मग ती निषेध किंवा आंदोलन किंवा मोर्चा, धरणे आंदोलन किंवा अन्यथा असो किंवा नसो, असा आहे; आणि त्यात त्यांचा समावेश होतो; परंतु, जेथे सर्वसामान्य जनतेला प्रवेशाचा करण्याचा किंवा कोणत्याही सद्भावपूर्वक धार्मिक सेवांचा हक्क नसतो अशा खाजगी जागेवर होणाऱ्या कोणत्याही जनसभेचा समावेश असणार नाही;

(बारा) "सार्वजनिक मिरवणूक" याचा अर्थ, सार्वजनिक ठिकाणी पादचाऱ्यांचा (पूर्णत: किंवा अंशत:) आणि सर्व प्रकारच्या वाहनांचा समावेश असलेला मोर्चा, धरणे आंदोलन किंवा मिरवणूक असा आहे आणि त्यात, त्यांचा समावेश होतो, परंतु त्यात सद्भावपूर्वक अंत्यविधी किंवा इतर धार्मिक मिरवणूक यांचा समावेश असणार नाही;

(तेरा) "रस्त्यावरील मेळावा" याचा अर्थ, कोणत्याही समस्येकडे लक्ष वेधण्याच्या प्रयोजनांसाठी किंवा जाहीर सभेसाठी पदपथावर अथवा रस्त्याच्या (मार्ग) रहदारी क्षेत्रावर, तरुपथावर, बहिर्दृश्य ठिकाणी किंवा चौकात लोकांच्या गटाची (एकतर मोटार वाहने, सायकली किंवा तीन चाकी सायकली यांसह किंवा त्याशिवाय) संघटित केलेली जन चळवळ, असा आहे आणि त्यात त्यांचा समावेश होतो.

(२) या नियमांत वापरलेले परंतु, त्यात व्याख्या न केलेले शब्द व शब्दप्रयोग यांना, सार्वजनिक मालमत्तेच्या नुकसानीस प्रतिबंध अधिनियम, १९८४ (१९८४ चा ३), मोटार वाहन अधिनियम, १९८८ (१९८८ चा ५०), महाराष्ट्र मालमत्तेच्या विरुपणास प्रतिबंध करण्याकरिता अधिनियम, १९९५ (१९९५ चा महा. ८), भारतीय न्याय संहिता, २०२३ (२०२३ चा ४५) किंवा, यथास्थिति, भारतीय नागरिक सुरक्षा संहिता, २०२३ (२०२३ चा ४६) यांमध्ये अनुक्रमे जे अर्थ नेमून दिलेले असतील, तेच अर्थ

असतील.

३. ठिकाणाची निश्चिती.- (१) रहिवाशांना, रहदारीला कमीत कमी अडथळा होण्याचे आणि विनियमित केलेल्या रीतीने निदर्शकांसाठी पुरेशी जागा उपलब्ध होण्याचे तत्व विचारात घेऊन, या नियमांमध्ये विनिर्दिष्ट केलेल्या कालावधीत धरणे, आंदोलने, संमेलने, सभा, निषेध, धरणे आंदोलने, मोर्चा, मिरवणुका, एकत्र जमणे, मेळावे, उपोषण किंवा इतर कोणत्याही स्वरूपाचा निषेध करण्यासाठी पुढील ठिकाण हे "विनिर्देशित केलेले क्षेत्र" म्हणून विनिर्दिष्ट केले आहे:-

" यासोबत जोडलेल्या अनुसूचीमध्ये अधिक तपशीलवारपणे वर्णन केलेले, आझाद मैदान पोलीस ठाण्याच्या प्रादेशिक अधिकारक्षेत्रातील आझाद मैदान (भाग), मुंबई महानगरपालिकेच्या मुख्य कार्यालयासमोर."

(२) वर नमूद केलेल्या विनिर्देशित क्षेत्राखेरीज, अतिरिक्त पोलीस आयुक्त, दक्षिण विभाग, मुंबई यांच्या क्षेत्रात कोणत्याही सार्वजनिक सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींना मुभा असणार नाही.

(३) विनिर्देशित केलेल्या क्षेत्रातील कोणतीही जाहीर सभा, संमेलने, मोर्चा, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींमध्ये सहभागी होणाऱ्या कोणत्याही व्यक्तीला, पोलीस कोठडीत असलेली व्यक्ती म्हणून समजले जाणार नाही.

४. पदनिर्देशित अधिकाऱ्याची परवानगी.- (१) विनिर्देशित क्षेत्रात जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादी आयोजित किंवा आमंत्रित करू इच्छिणारी कोणतीही व्यक्ती, संघ किंवा संघटना, त्यासाठी अशी परवानगी मिळावी म्हणून, किमान सात दिवस अगोदर, **नमुना ब** मधील हमीपत्रासह, **नमुना अ** मध्ये नमूद केलेल्या पदनिर्देशित अधिकाऱ्याकडे अर्ज करील.

(२) पदनिर्देशित अधिकारी, विनंती अर्ज प्राप्त झाल्यावर त्याची तपासणी करील आणि प्रस्तावित जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे व मिरवणुका, इत्यादींसाठी परवानगी द्यावी किंवा कसे याचा निर्णय घेईल. विनंती विचारात घेण्यात येईल आणि त्यानंतर एकतर, परवानगी

देण्यात येईल किंवा नाकारण्याची कारणे नमूद करून परवानगी नाकारण्यात येईल.

(३) पदनिर्देशित अधिकारी, पोट-नियम (२) अन्वये कोणतीही परवानगी देण्यापूर्वी, अशी खात्री करील की,-

(क) प्रस्तावित जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका इत्यादी, केंद्र सरकारने, राज्य शासनाने किंवा स्थानिक प्रशासनाने आयोजित केलेल्या इतर कार्यक्रमांशी किंवा पूर्वी परवानगी दिलेल्या सभा, मिरवणुका किंवा धरणे आंदोलने यांच्याशी एकरूप होणार नाहीत किंवा त्यांच्यामध्ये हस्तक्षेप करणारी नाहीत;

(ख) प्रस्तावित जाहीर सभा, संमेलने, मोर्चा, आंदोलने, निदर्शने, धरणे, मेळावे आणि मिरवणुका, इत्यादी अपेक्षित वेळेत व ठिकाणी आयोजित केल्यामुळे वाहनांच्या किंवा पादचाऱ्यांच्या वाहतुकीसाठी लक्षणीय समस्या निर्माण होणार नाहीत.

(४) प्रस्तावित जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादी नियोजित वेळेत, ठिकाणी आणि स्वरूपात आयोजित केल्यामुळे, इतरांचे हक्क धोक्यात येणार नाहीत.

(५) बृहन्मुंबई महानगरपालिका, विनिर्देशित क्षेत्रामध्ये निषेध करणाऱ्यांसाठी वैद्यकीय सेवा, प्रसाधनगृहे, मुतारी व पिण्याचे पाणी पूरवील.

(६) अर्ज विचारात घेण्याची प्रक्रिया:-

(क) अशी परवानगी मागणारा अर्ज प्राप्त झाल्यानंतर, पदनिर्देशित अधिकारी, तो अर्ज,सूचना मिळाल्यापासून तीन दिवसांच्या आत त्यांचे आक्षेप, कोणतेही असल्यास, मागविण्यासाठी बृहन्मुंबई महानगरपालिका, अग्निसुरक्षा अधिकारी, इत्यादींसह सर्व संबंधित प्राधिकाऱ्यांकडे पाठवू शकेल.

(ख) "प्रथम येणाऱ्यास प्रथम प्राधान्य" या तत्त्वानुसार परवानगी देण्यात येईल. पदनिर्देशित अधिकारी, सभा परस्परव्याप्त होण्याचे टाळता यावे म्हणून जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींच्या तारखा, वेळ, ठिकाण आणि आयोजक यांच्या तपशील असलेली एक दिनदर्शिका ठेवील.

(ग) पदनिर्देशित अधिकाऱ्याने दिलेल्या प्रत्येक परवानगीमध्ये, विनिर्दिष्ट व अनिवार्य अटी व



शर्तींचा समावेश असेल. पदनिर्देशित अधिकाऱ्याला, सार्वजनिक सुरक्षा, शांतता व प्रशांततेच्या हितार्थ त्याला योग्य वाटेल त्याप्रमाणे अशा कोणत्याही विनंतीवर कोणत्याही आणखी शर्ती समाविष्ट करण्याचे स्वातंत्र्य असेल.

(घ) पदनिर्देशित अधिकारी, राज्य विधिमंडळाची अधिवेशने, अतिमहत्त्वाच्या व्यक्ती किंवा महत्त्वाच्या व्यक्ती यांचे दौरे, प्रजासत्ताक दिन, स्वातंत्र्य दिन, महत्त्वाचे शासकीय कार्यक्रम, शासकीय उत्सवाचे दिवस व नवीन वर्ष साजरे करणे, इत्यादी कालावधीत आणि वेळोवेळी विनिर्दिष्ट करण्यात येतील अशा इतर दिवशी परवानगी देण्यास नकार देऊ शकेल.

(ङ) पदनिर्देशित अधिकाऱ्याला महत्त्वाच्या व्यक्तींच्या सुरक्षेची निकड किंवा इतर कोणतीही गुप्तवार्ता माहिती यांसारख्या अनपेक्षित व आकस्मिक प्रसंगी परवानगी रद्द करण्याचे स्वातंत्र्य असेल. असे रद्द करण्याची कारणे लेखी स्वरूपात नोंदविण्यात येतील आणि आयोजकांना कळविण्यात येतील.

(च) आंदोलनांस एका वेळी फक्त एका दिवसासाठी आणि केवळ शासकीय कामकाजाच्या दिवशी परवानगी देण्यात येईल. शनिवार, रविवार व शासकीय किंवा सार्वजनिक सुट्टीच्या दिवशी कोणत्याही परवानग्या देण्यात येणार नाहीत.

(छ) पदनिर्देशित अधिकाऱ्याला, ज्या व्यक्तीला (व्यक्तींना) किंवा व्यक्तींच्या ज्या संघाला अशी परवानगी देण्यात आली आहे, त्यांचे नाव किंवा नावे विनिर्दिष्ट करण्याचे स्वातंत्र्य असेल.

(ज) जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींशी संबंधित असलेल्या सर्व बाबींवरील पदनिर्देशित अधिकाऱ्याचा निर्णय, अंतिम असेल आणि तो आयोजकांवर बंधनकारक असेल.

५. निदर्शकांच्या वाहनांना प्रवेश व वाहनतळ.- सार्वजनिक सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींशी संबंधित असलेल्या ठिकाणी निदर्शकांची वाहने व वाहनतळे यासंबंधात पुढील शर्ती लागू असतील:-

(क) वाहनतळासाठी (जर अशी जागा उपलब्ध असेल तर) वाहतूक पोलीसांशी विचारविनिमय

करून परवानगी देता येईल.

(ख) ट्रॅक्टर्स, ट्रॉलीज, बैलगाड्या, सायकल रिक्षा किंवा हातगाड्या, मालवाहतुकीची किंवा जड वाहने यांना परवानगी असणार नाही.

(ग) घोडे, हत्ती, उंट, गुरे, कोंबड्या इत्यादींसारखे प्राणी किंवा पक्षी, इत्यादींना सार्वजनिक सभा, संमेलने, मोर्चे, निदर्शने, आंदोलने, धरणे, मेळावे, मिरवणुका, इत्यादींमध्ये परवानगी असणार नाही.

६. निदर्शकांच्या एकूण संख्येवर निर्बंध घालणे.- (१) विनिर्देशित क्षेत्रामध्ये परवानगी दिलेल्या निदर्शकांची संख्या, पाच हजार इतकी असेल.

(२) योग्य वेळेच्या उपलब्धतेच्या अधीन राहून, एकाच दिवशी वेगवेगळी निदर्शने करण्यास परवानगी देता येईल.

(३) नमुना अ नुसार हमीपत्रात नमूद केलेल्या संख्येपेक्षा अधिक संख्येने निदर्शक आणणारा कोणताही आयोजक, या नियमांन्वये दिलेल्या परवानगीचे उल्लंघन करण्याचा जाणीवपूर्वक प्रयत्न करीत असल्याचे मानण्यात येईल. असे आयोजक व असे निदर्शक कठोर कायदेशीर कारवाईस आणि याबाबतीत कायद्यानुसार परवानगी असलेल्या परिणामांना जबाबदार असतील आणि पदनिर्देशित अधिकाऱ्याला, अशा आयोजकांनी किंवा निदर्शकांनी भविष्यात केलेला कोणताही अर्ज नाकारण्याचे स्वातंत्र्य देखील असेल.

७. विनिर्देशित केलेल्या क्षेत्राच्या दिशेने आणि क्षेत्राकडून मोर्चा नेला जाणार नाही.- विनिर्देशित क्षेत्राच्या दिशेने आणि क्षेत्राकडून मोर्चा नेण्यास परवानगी असणार नाही. आयोजकाने याची खात्री केली पाहिजे की, निषेध करणारे किंवा निदर्शक, नियमित रहदारी व पादचाऱ्यांची ये-जा यांस अडथळा न येता आणि कोणत्याही प्रकारची निदर्शने, घोषणाबाजी किंवा अन्यथा कोणत्याही प्रकारची अशांतता निर्माण न करता केवळ विनिर्देशित केलेल्या क्षेत्रातून शांतपणे एकत्र येतील तसेच पांगतील.

८. ध्वनिक्षेपक व गोंगाट करणाऱ्या इतर उपकरणांचा वापर.- (१) पदनिर्देशित अधिकाऱ्याकडून विनिर्दिष्ट परवानगी घेतल्याशिवाय, जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादी ठिकाणी ध्वनिक्षेपक, सार्वजनिक प्रचार यंत्रणा किंवा गोंगाट करणारी उपकरणे

यांचा वापर करण्यात येणार नाही.

(२) जर पदनिर्देशित अधिकाऱ्याने अशी परवानगी दिली असेल त्याबाबतीत, ध्वनिक्षेपकांस किंवा गोंगाट करणाऱ्या उपकरणांना पर्यावरण संरक्षण अधिनियम, १९८६ (१९८६ चा २९) अन्वये केलेल्या ध्वनी प्रदूषण (विनियमन व नियंत्रण) नियम, २०२० नुसार परवानगी दिलेल्या डेसिबल मर्यादेच्या आतच परवानगी असेल.

९. तंबू व तात्पुरत्या संरचना उभारण्यास निर्बंध.- निदर्शकांना, विनिर्देशित क्षेत्रामध्ये तात्पुरत्या कालावधीसाठी देखील तंबू व तात्पुरत्या संरचना उभारण्यास परवानगी देण्यात येणार नाही. तथापि, अपवादात्मक परिस्थितीमध्ये, पदनिर्देशित अधिकारी, पदनिर्देशित अधिकाऱ्याने, वेळोवेळी, निर्देशित केल्याप्रमाणे तंबू टाकण्याच्या आणि बांधण्याच्या मानकांचे कडक अनुपालन करण्यास अधीन राहून, तात्पुरते तंबू किंवा व्यासपीठ उभारण्याची परवानगी देऊ शकेल.

१०. वेळेवरील निर्बंध.- या नियमाखालील सर्व परवानग्या, फक्त सकाळी ९.०० ते सायंकाळी ६.०० याच वेळेसाठी देण्यात येतील. विनिर्देशित क्षेत्र, सायंकाळी ६.०० पासून सकाळी ९.०० पर्यंत रिकामे करण्यात येईल सायंकाळी ६.०० नंतर आणि सकाळी ९.०० पूर्वी कोणतीही व्यक्ती विनिर्देशित क्षेत्रामध्ये आढळल्यास, ती, अंमलात असलेल्या व लागू असलेल्या कायद्यान्वये अनुज्ञेय असेल अशा मर्यादेपर्यंत द्रव्यदंडाच्या आणि/ किंवा कारावासाच्या शिक्षेसाठी पात्र असेल.

११. मनाई.- कोणत्याही जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींदरम्यान पुढील कृत्यांना सक्त मनाई असेल:-

(क) सहभागी व्यक्तींना, लाठ्या, अग्निशस्त्रे, भाले, तलवारी किंवा आक्रमणकारी हत्यार म्हणून वापरता येऊ शकतील अशा कोणत्याही वस्तू बाळगता येणार नाहीत.

(ख) विनिर्देशित क्षेत्रामध्ये कोणताही वायू, शस्त्रे, स्फोटक पदार्थ, विषारी पदार्थ, ज्वलनशील पदार्थ आणि / किंवा वाहन आणण्यास परवानगी असणार नाही;

(ग) सहभागी व्यक्तींना, काठ्यांना लावलेले झेंडे व फलक (बॅनर) बाळगता येतील, परंतु ते केवळ प्रदर्शनासाठी असतील. आयोजकांनी याची खात्री केली पाहिजे की, झेंडे किंवा फलकांचा (बॅनरचा) आकार नऊ फूट x सहा फुटांपेक्षा अधिक असणार नाही आणि फलकांसाठी किंवा झेंड्यांसाठी

वापरलेली कोणतीही काठी, दोन फूटांपेक्षा अधिक लांबीची असणार नाही. कार्यक्रमात, इतर व्यक्तींच्या किंवा समुदायाच्या भावना दुखावतील असे आक्षेपार्ह घोषणा फलक किंवा फलक (बॅनर) यांचे प्रदर्शन केले जाणार नाही.

(घ) शिवीगाळ करणे किंवा चिथावणीखोर भाषणे करणे, आक्षेपार्ह चलचित्रण किंवा ध्वनीमुद्रण करणे आणि ते समाज माध्यमातून किंवा इतर कोणत्याही प्रकारे प्रसारित करणे यांसारख्या कोणत्याही कृत्यांना परवानगी दिली जाणार नाही. कोणतीही सहभागी व्यक्ती, धर्म, वंश, स्थान, जन्म, निवासस्थान, भाषा, इत्यादी कारणांवरून जमावाच्या भावना भडकवण्याचा किंवा त्यांना चिथावणी देण्याचा किंवा वेगवेगळ्या गटांमध्ये शत्रुत्व वाढविण्याचा संभव असलेल्या कोणत्याही भाषेचा वापर करणार नाही किंवा अशा गटांमध्ये सलोखा राखण्यास कोणत्याही रीतीने बाधा होईल अथवा सार्वजनिक शांतता व प्रशांतता बिघडेल अशी कोणतीही कृती करणार नाही.

(ड.) सहभागी झालेली कोणतीही व्यक्ती, आत्मदहनाचा प्रयत्न करणार नाही किंवा आत्महत्या करण्याचा प्रयत्न करणार नाही किंवा उपोषण करणार नाही अथवा ज्यामुळे, एकतर अशा सहभागी झालेल्या व्यक्तीच्या किंवा इतर कोणाच्याही जीवाला किंवा अवयवांना धोका निर्माण होईल असे कोणतेही पाऊल उचलणार नाही.

(च) सहभागी झालेली कोणतीही व्यक्ती, सार्वजनिक मालमत्तेचे नुकसान होईल, सरकारी कर्मचाऱ्यावर हल्ला करण्यात येईल, जाळपोळ, इत्यादी करण्यात येईल अशी कोणतीही कृती करणार नाही. जर असे कोणतेही नुकसान झाल्यास, त्याच्या दुरुस्तीचा व पुनःस्थापनेचा खर्च प्रचलित कायदेशीर तरतुदींनुसार अशा आयोजकांकडून किंवा सहभागी व्यक्तींकडून वसूल करण्यात येईल.

(छ) सहभागी झालेली कोणतीही व्यक्ती, विनिर्देशित क्षेत्रात कोणतीही कागदपत्रे, पुस्तके, पुतळा, इत्यादी जाळणार नाही.

(ज) सहभागी झालेली कोणतीही व्यक्ती, विनिर्देशित क्षेत्रात कोणतेही अन्न शिजवणार नाही किंवा केरकचरा टाकणार नाही.

(झ) विनिर्देशित क्षेत्रात जमलेल्या किंवा सहभागी झालेल्या सर्व व्यक्ती, संध्याकाळी ६:०० वाजेपर्यंत ती जागा शांततेत रिकामी करतील.



(ज) विनिर्देशित क्षेत्रामधील मिरवणुकीच्या बाबतीत, पदनिर्देशित अधिकाऱ्याला ज्या मार्गावरून व ज्या वेळी अशी मिरवणूक जाईल तो मार्ग व ती वेळ यासंबंधातील अशा शर्ती व निर्बंध आणि त्याला लादणे योग्य वाटेल अशा इतर शर्ती लादण्याचे स्वातंत्र्य असेल.

(ट) सहभागी झालेली कोणतीही व्यक्ती, वाहतूक मार्गावर व पदपथावर जमणार नाही किंवा तो अडवणार नाही.

१२. आयोजकाची जबाबदारी.- (क) या नियमांच्या तरतुदींन्वये ज्याला परवानगी देण्यात आलेली आहे अशी प्रत्येक व्यक्ती किंवा संघ, पदनिर्देशित अधिकारी याबाबतीत लादील अशा, परवानगीमध्ये विनिर्दिष्ट केलेल्या सर्व शर्तींचे यथोचित पालन करण्यास जबाबदार असेल. ज्या अटी व शर्तींवर उक्त परवानगी देण्यात आली आहे, त्या अटी व शर्तींपैकी कोणत्याही अटींचा व शर्तींचा भंग किंवा उल्लंघन झाल्यास, ज्या व्यक्तीला किंवा संघाला परवानगी देण्यात आली असेल आणि जी व्यक्ती जमावाची सदस्य होती अशी प्रत्येक व्यक्ती किंवा संघटना या अधिनियमाच्या आणि भारतीय न्याय संहिता, २०२३ (२०२३ चा ४५) याच्या संबंधित तरतुदींअन्वये त्यांच्याविरुद्ध कारवाई करण्यास पात्र असतील.

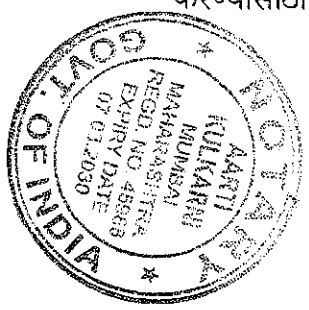
(ख) आयोजक, सार्वजनिक प्राधिकरणाशी समन्वय साधून काम करील आणि प्राधिकाऱ्यांना सर्व परिस्थितीत सहकार्य करील.

(ग) वर नमूद केल्याप्रमाणे, आयोजक विनिर्देशित क्षेत्रातील सहभागी व्यक्तींची कमाल संख्या, नमुना अ मध्ये नमूद केलेल्या सहभागी व्यक्तींच्या संख्येपेक्षा अधिक असणार नाही याची खात्री करील.

(घ) कार्यक्रमाचे आयोजक, व्यवस्थापक, व्यवस्थापकाचे सहायक आणि सुव्यवस्था राखणाऱ्या व्यक्ती, संपूर्ण कार्यक्रमादरम्यान विनिर्देशित क्षेत्रात उपस्थित राहतील.

(ङ) आयोजकास, ज्या व्यक्ती त्यांच्या मागण्यांचे निवेदन सादर करण्यासाठी उपलब्ध असलेल्या संबंधित शासकीय प्राधिकाऱ्यांकडे किंवा कार्यालयात घेऊन जाऊ शकतील अशा जास्तीत जास्त पाच व्यक्तींचे प्रतिनिधिमंडळ तयार करता येईल.

(च) जर निदर्शकांनी, या नियमांच्या तरतुदींचे उल्लंघन केले आणि आयोजकांच्या सूचनांचे पालन केले नाही तर, आयोजक, एकतर कार्यक्रम बंद केल्याचे घोषित करील किंवा सुव्यवस्था पूर्ववत करण्यासाठी पोलीस कर्मचाऱ्यांकडे किंवा स्थानिक शासनाच्या प्रतिनिधीकडे जाईल.



(छ) जर कार्यक्रमाचे निदर्शक, पोलीस कर्मचाऱ्यांनी किंवा स्थानिक शासनाच्या प्रतिनिधीने या नियमांच्या आवश्यकतांचे अनुपालन करण्याबाबत दिलेल्या सूचनांचे पालन करीत नसतील तर, पोलीस कर्मचारी किंवा स्थानिक शासनाचा प्रतिनिधी, कार्यक्रम बंद करण्यात आल्याचे घोषित करील, किंवा त्यात सहभागी झालेल्या व्यक्तींना कार्यक्रमाचे विनिर्देशित क्षेत्र सोडून जाण्याची मागणी करील आणि त्यानंतर, निदर्शकांविरुद्ध लागू असलेल्या अधिनियमान्वये अनुज्ञेय असेल अशी कायदेशीर कारवाई करील.

१३. पदनिर्देशित अधिकाऱ्याचे अधिकार.- पदनिर्देशित अधिकाऱ्याच्या निर्देशानुसार, कोणत्याही पोलीस अधिकाऱ्यास, या नियमांच्या नियम ४ च्या तरतुदींनुसार, ज्यांना परवानगी देण्यात आलेली नाही किंवा ज्यामध्ये अशा प्रकारे देण्यात आलेल्या परवानगीमध्ये विनिर्दिष्ट केलेल्या कोणत्याही शर्तींचे उल्लंघन होत आहे, अथवा या नियमांनुसार दिलेल्या आदेशाचे किंवा अशा आदेशात विनिर्दिष्ट केलेल्या कोणत्याही शर्तींचे उल्लंघन करून, किंवा इतर कोणत्याही कायद्याचे उल्लंघन करून बोलावण्यात आलेली किंवा घेण्यात येत असलेली अशी कोणतीही जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादी थांबविता येतील आणि अशी मिरवणूक पांगवण्याचा आदेश देता येईल. अशा प्रसंगी, पदनिर्देशित अधिकाऱ्यास, सहभागी व्यक्तींना विनिर्देशित क्षेत्रातून आणि अन्य सभोवतालच्या क्षेत्रांतून बाहेर काढण्यासाठी आवश्यक बळाचा वापर करता येईल.

१४. कार्यक्रमानंतरच्या उपाययोजना.- सार्वजनिक सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादी समाप्त झाल्यानंतर सर्व संबंधित शासकीय अभिकरणे पुढील उपाययोजनांची सुनिश्चिती करतील:-

(क) स्वच्छता मोहीम हाती घेणे आणि लवकरात लवकर पूर्ववत करणे:

(ख) पर्यावरणाचे किंवा सार्वजनिक मालमत्तेचे नुकसान झाल्यास, आयोजकाकडून प्रचलित कायदेशीर तरतुदींनुसार, नुकसान भरपाई वसूल करणे; आणि

(ग) वरीलप्रमाणे कोणतेही उल्लंघन झाल्याच्या बाबतीत, सार्वजनिक मालमत्तेच्या नुकसानीस प्रतिबंध अधिनियम, १९८४ (१९८४ चा ३) अन्वये असलेली मात्र त्यापुरती सीमित नसलेली आवश्यक कायदेशीर कारवाई सुरू करण्यात येईल.

अनुसूची

(नियम ३ पहा)

आझाद मैदानातील विनिर्देशित केलेल्या क्षेत्राचे स्थान

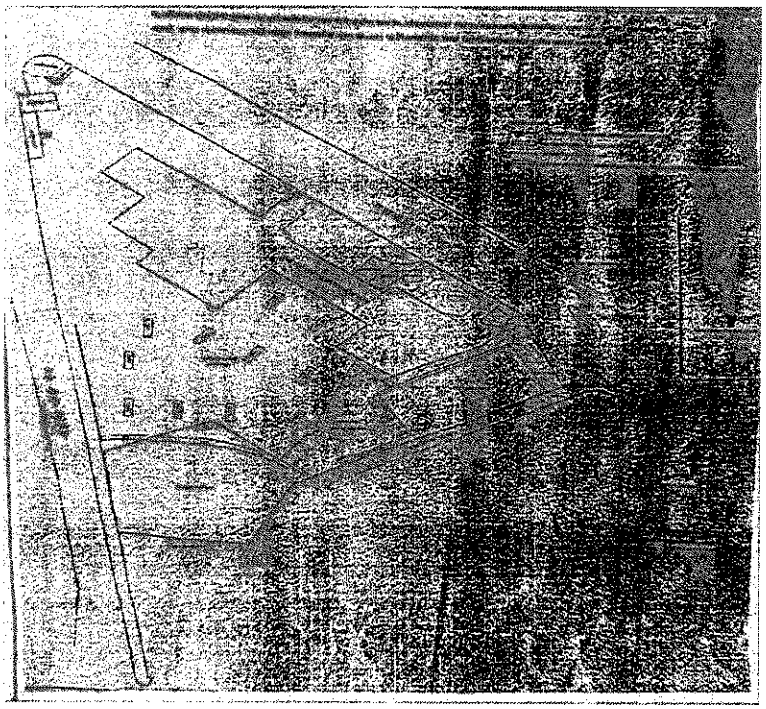
आझाद मैदानावर नेमून दिलेले क्षेत्र :

क. पश्चिम दिशेला : मुंबई जिमखान्याचे मैदान ;

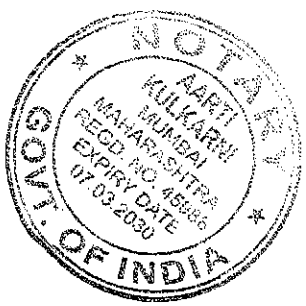
ख. पूर्व दिशेला : बृहन्मुंबई महानगरपालिका;

ग. दक्षिण दिशेला : हजारीमल सोमाणी मार्ग;

घ. उत्तर दिशेला : मेट्रो रेल्वे प्रकल्प क्षेत्र.



अक्षवृत्त :- १८.९३९४२८° रेखावृत्त :- ७२.८३२६७७°



नमुना अ

(नियम ४ (१) पहा)

जाहीर सभा / मिरवणूक / धरणे / निदर्शन, इत्यादीसाठी परवानगी मिळण्याचा अर्ज.

१. अर्जदाराचे संपूर्ण नाव .....

२. अर्जदाराचा पत्ता .....

३. ..... च्या वतीने केलेला अर्ज (स्वत: किंवा संघटना)

४. जाहीर सभा आणि / किंवा सार्वजनिक मिरवणूक, इत्यादीकरिता हवी आहे किंवा कसे.

५. ..... (वाजता) सुरू होईल .....(वाजता) समाप्त होईल.

६. सभा असल्यास, सभेचे ठिकाण.....

७. मिरवणूक असल्यास, एकत्र जमण्याच्या ठिकाणाचे, मार्गाचे व सभा विसर्जित होण्याच्या ठिकाणाचे वर्णन.....

८. सभेत / मिरवणुकीत सहभागी होणाऱ्या व्यक्तींची व वाहनांची कमाल संख्या.....

९. सभेत / मिरवणुकीत, बँड, ध्वनिक्षेपक, फलक (बॅनर), घोषणाफलक, निशाणी किंवा ध्वज वापरण्याची इच्छा असल्यास, त्याचा तपशील.....

१०. सभा / मिरवणूक आयोजित करणाऱ्या व आयोजित करण्यास सहाय्य करणाऱ्या व्यक्तींची नावे.....

११. जाहीर सभेचे / मिरवणुकीचे कारण.....

१२. संबंधित शासकीय विभाग (कोणतेही असल्यास)

दिनांक:- .....

.....

(अर्जदाराची स्वाक्षरी)

नमुना ब

(नियम ४ (१) पहा)

आयोजकाचे हमीपत्र

कार्यक्रमाचा दिनांक.....
जाहीर सभा, संमेलने, मोर्चे, आंदोलने, निदर्शने, धरणे, मेळावे, मिरवणुका, इत्यादींचे स्थळ.....
वेळ.....तास ते..... तासापर्यंत.....
सहभागी होणाऱ्यांची संख्या.....
स्वयंसेवकांची संख्या.....

मी, ...(आयोजकांचे नाव व पदनाम)..... (संघटनेचे नाव) या संघटनेचा आयोजक याद्वारे, असे हमीपत्र देतो की, ... या दिवशी धरणे / निदर्शने करण्यासाठी प्रतिनिधी म्हणून संघटनेने मला प्राधिकृत केले आहे. मी अशी हमी देतो की, मी, महाराष्ट्र पोलीस अधिनियम (१९५१ चा २२), जाहीर सभा, आंदोलने व मिरवणुका (अपर पोलीस आयुक्त, दक्षिण विभाग, मुंबई यांच्या अधिकार क्षेत्रांत) नियम, २०२५ आणि पुढील अटी व शर्ती यांचे पालन करील :-

१. मी, कर्तव्यावर असलेल्या कोणत्याही पोलीस अधिकाऱ्याने मागणी केल्यावर, त्यास दाखवण्यासाठी दिलेली परवानगीची मूळ प्रत सोबत बाळगील.

२. मी, जिच्याशी पोलीस संपर्क करू शकतील अशा, ... जबाबदार व्यक्तीची (आयोजकाने प्रतिनियुक्त केलेल्या संपर्क व्यक्तीचे नाव, पदनाम व दूरध्वनी क्रमांक) प्रतिनियुक्ती करील.

३. मी, नागरी/स्थानिक स्वराज्य संस्थांशी विचारविनिमय करून, पिण्याचे पाणी (टँकरद्वारे पुरवठा करून) व प्रथमोपचार / वैद्यकीय मदत यांची देखील सभा स्थळी आणि धरणे / निदर्शन कालावधीत



पर्याप्त व्यवस्था करील.

४. मी व इतर आयोजक याची खात्री करतील की, धरणे, निदर्शने, इत्यादी सुव्यवस्थितरीतीने करण्यात येईल आणि वाहतुकीच्या सामान्य ओघामध्ये अडथळा आणणार नाही आणि वाहनतळ व वाहतुकीच्या नियमांचे पालन करण्यात येईल.

५. मी व इतर व्यक्ती, धरणे, निदर्शने, इत्यादींमध्ये सहभागी होणाऱ्यांची मर्यादा, माझ्या निवेदनात विनिर्दिष्ट केलेल्या संख्येपर्यंतच मर्यादित ठेवील आणि कोणत्याही परिस्थितीत त्यात वाढ होऊ देणार नाही.

६. मी, व इतर आयोजक याची खात्री करतील की, पोलिसांना सहाय्य करण्यासाठी पुरेशा संख्येतील स्वयंसेवकांना त्या स्थळी व त्या स्थळाभोवती तैनात करण्यात येईल आणि तसेच संपर्काच्या तपशीलासह स्वयंसेवकांची यादी आगाऊ स्वरुपात पोलिसांना पुरवील.

७. मी व इतर आयोजक याची खात्री करतील की, धरणे, निदर्शन, सभा, इत्यादी, विहित ठिकाणी / स्थळीच घेण्यात येईल.

८. मी व इतर आयोजक याची खात्री करतील की, धरणे, निदर्शन, इत्यादी विहित कालावधीत, म्हणजेच सकाळी ९:३० ते सायंकाळी ५:३०. या वेळेत घेण्यात येईल.

९. मी व इतर आयोजक, ध्वजांसाठी / फलकांसाठी २ फुटांपेक्षा अधिक लांबीची काठी वापरणार नाही. ध्वजाचा / फलकाचा आकार ९ फूट × ६ फूट किंवा त्यापेक्षा कमी असे असेल. सहभाग घेणाऱ्या व्यक्ती, काठीवरील ध्वज / फलक, इत्यादी केवळ प्रदर्शनाच्या हेतूनेच जवळ बाळगतील.

१०. मी, व इतर आयोजक याची खात्री करतील की, धरणे, निदर्शने, इत्यादींमध्ये सहभागी होणाऱ्या व्यक्ती, आक्रमणकारी हत्यार म्हणून वापरले जाण्याचा संभाव असतील अशा लाठ्या, अग्निशस्त्रे, भाले, तलवारी व इतर वस्तू जवळ बाळगणार नाहीत. मी याची खात्री करील की, सहभागी होणारी कोणतीही व्यक्ती, ज्यामुळे मानवी जीवितास किंवा त्याच्या सुरक्षिततेस धोका निर्माण होईल अथवा सार्वजनिक शांतता भंग होईल किंवा दंगा उसळेल असे कोणतेही नकली अग्निशस्त्र किंवा इतर कोणतेही अग्निशस्त्र जवळ बाळगणार नाहीत.

११. मी, व इतर आयोजक, याची खात्री करतील की, सहभागी झालेली कोणतीही व्यक्ती,



चिथावणीखोर भाषणे करणार नाही किंवा जमावाच्या भावना भडकवणारी किंवा त्यांना चिथावणी देणारी किंवा विविध गटांमध्ये धर्म, वंश, स्थान किंवा जन्म, निवास, भाषा, इत्यादी कारणावरून शत्रुत्व निर्माण करणारी किंवा तसा संभव असणारी भाषा वापरणार नाही अथवा अशा गटांमधील सलोखा राखण्यास बाधक ठरणारी किंवा सार्वजनिक प्रशांतता बिघडविणारी अशी कोणतीही कृती कोणत्याही रीतीने करणार नाही.

१२. मी, व इतर आयोजक याची खात्री करतील की, धरणे, निदर्शने, इत्यादींमध्ये सहभागी होणाऱ्या व्यक्ती, पोलीस आयुक्त, मुंबई यांनी किंवा कर्तव्यावर असलेल्या इतर कोणत्याही पोलीस अधिकाऱ्याने, मेळावा किंवा धरणे / निदर्शने, इत्यादीच्या कोणत्याही टप्प्यावर दिलेल्या सर्व कायदेशीर निदेशांचे तात्काळ अनुपालन करतील.

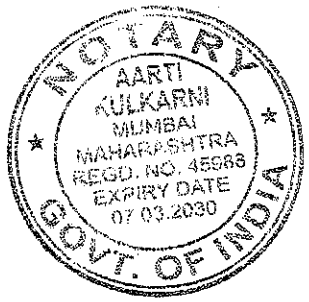
१३. मी, व इतर आयोजक याची खात्री करतील की, सहभागी होणारी कोणतीही व्यक्ती, सार्वजनिक मालमत्तेचे नुकसान होईल, शासकीय कर्मचाऱ्यांवर हल्ला करण्यात येईल किंवा शासकीय कर्मचाऱ्यांच्या कर्तव्यात अडथळा निर्माण होईल, जाळपोळ, इत्यादी होईल अशा रीतीने कोणतीही कृती करणार नाही किंवा इतर कायद्याचे उल्लंघन होईल अशी कोणतीही गोष्ट करणार नाही.

१४. मी, व इतर आयोजक अशी खात्री करतील की, सहभागी होणारी कोणतीही व्यक्ती, ज्यामुळे कोणत्याही धर्माचा किंवा कोणत्याही वर्गातील व्यक्तींचा अपमान होईल या उद्देशाने कोणतेही प्रार्थनास्थळ किंवा व्यक्तींच्या कोणत्याही वर्गाने पवित्र मानलेली कोणतीही वस्तू नष्ट करणार नाही, तिचे नुकसान करणार किंवा ती अपवित्र करणार नाही.

१५. मी, व इतर आयोजक, धरण्याच्या, निदर्शनाच्या विहित ठिकाणावरून कूच करण्याच्या अविर्भावात जाणार नाही. या कालावधीत, मी व इतर आयोजक, पोलिसांच्या सूचनांचे / निदेशांचे अनुपालन करू.

१६. मी, व इतर आयोजक, कोणत्याही प्रकारची कागदपत्रे, पुस्तके व प्रतिमा जाळणार नाही आणि अन्न शिजवण्यास, कचरा करण्यास घोषणा फलक, फलक, प्लास्टिक कचरा फेकण्यास प्रोत्साहन देणार नाही.

१७. मी, व इतर आयोजक, याची खात्री करतील की, विनिर्दिष्ट परवानगीशिवाय, धरणे, निदर्शन



स्थळी ध्वनिक्षेपकाचा किंवा जनसंबोधन यंत्रणेचा वापर करण्यात येणार नाही आणि ज्यासाठी पदनिर्देशित अधिकाऱ्याने परवानगी दिलेली असेल अशा सकाळी ९:३० ते सायंकाळी ५:३० या वेळेतच केवळ ध्वनिक्षेपक वापरण्यात येईल.

१८. मी, व इतर आयोजक अशी खात्री करतील की, ट्रॅक्टर, ढकलगाडी (ट्रॉली), बैलगाडी, सायकल-रिक्षा, हातगाडी यांसह कोणतीही वाहने किंवा पक्षी, घोडे, हत्ती, उंट, कोंबड्या, इत्यादींसारखे प्राणी धरणे, निदर्शने, इत्यादी ठिकाणी आणली जाणार नाहीत.

१९. मी, अनुयायांना नियंत्रणाखाली ठेवण्यास जबाबदार असेल, त्यात निष्फळ ठरल्यास, माझ्यासह इतर आयोजकांवर विद्यमान कायद्याच्या तरतुदींन्वये खटला दाखल करण्यात येईल.

२०. मी व इतर आयोजक, हमीपत्रातील मार्गदर्शक तत्वांचे अनुपालन करतील आणि पोलीसांना, सर्व परिस्थितीत सहकार्य करतील.

दिनांक .....
ठिकाण .....

.....
(स्वाक्षरी)

..... (मोठ्या वर्णात नाव)
..... (पदनाम)
..... (संघटनेचे नाव)

भ्रमणध्वनी क्रमांक. .....
इतर कोणताही दूरध्वनी क्रमांक. .....

पोलीस आयुक्त,
बृहन्मुंबई.

THE COMMISSIONER OF POLICE, BRIHAN MUMBAI

Opposite Crawford Market, Mumbai 400 001, dated the 26th August 2025.

NOTIFICATION

MAHARASHTRA POLICE ACT.

No. पोउआ/अभियान/३०३५/२०२५.—Whereas, the Commissioner of Brihan Mumbai in exercise of the powers conferred by clause (o) of sub-section (*1*) and the proviso to sub-section (*6*) of section 33 of the Maharashtra Police Act and of all other powers enabling him in that behalf, being satisfied that circumstances exist which render it necessary that such rules be brought into force at once hereby makes the following rules, namely :—

1. *Short title, extent and application.*—

(i) These rules may be called the Public meetings, agitations and processions Rules, 2025.

(ii) It extends within the territorial jurisdiction of Additional Commissioner of Police, South Region, Mumbai.

(iii) It shall apply to all Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions, by

whatever name called to be conducted within the jurisdiction of Additional Commissioner of Police, South Region, Mumbai :

Provided that the provisions of these rules shall not apply to Government functions, Traditional or Religious processions, Sports activities, Educational awareness programs, Marriages, funerals, Indoor functions and such similar activites.

2. *Definitions.*—In these rules, unless the context otherwise requires,—

(i) "Act" means the Maharashtra Police Act (XXII of 1951);

(ii) "agitation" means the act or process to stir up any individual or group of individuals with respect to any political or social cause or theory before the public by initiating argument, debate, persistent urging or arguing



forcefully.

(iii) "Commissioner of Police" means the police officer appointed as the Commissioner of Police under clause (*a*) of section 7 of the Act;

(iv) "Demonstration" means organized movement of people on the roads, streets, squares, pavements, or other territories designed for traffic, (pedestrian, vehicular or otherwise) in order to express ideas and opinions for the purposes of drawing attention to any social, political or public policy issues or for acquiring public expression of their moods, opinions, beliefs or for a Picket, and shall also include a mass gathering of such people for the aforesaid purpose;

(v) "Designated Officer" means the Senior Police Inspector of concerned police station having jurisdiction over the designated area and any other officer as the Commissioner of Police, Brihan Mumbai may appoint in that behalf, for the effective implementation of the these rules;

(vi) "Dharna", means the practice of compelling compliance or exacting justice by sitting or crowding at the doorstep of concerned authority until the demand is granted and using various means such as fasting until death, trespassing, causing a sit-in-protest, etc.;

(vii) "Municipal Corporation of Brihan Mumbai" means the Municipal Corporation of Brihan Mumbai constituted under the Mumbai Municipal Corporation Act (III of 1888) ;

(viii) "Morcha" means large public meeting or march (organized walk by many people), organized to support a particular idea, demand, interest, issue or political party;

(ix) "Noisy Instrument" means and includes loudspeakers,

loudhailers, megaphones, amplifiers, electrical or electronic or digital recorders and any traditional instrument which exceeds the permitted decibel;

(x) "Picket" means an event during which a person or persons are expressing ideas and opinions regarding various socially significant issues of political, economic and social nature in a public place, using posters, slogans, banners or other means, but during which no speeches or public addresses are made;

(xi) "Public Meeting" means and includes any meeting, gathering, or assembly of persons, whether in the form of protest or Agitation or Morcha, Picket or otherwise for the purpose of the discussion or for the purpose of the expression of views of matters of Public Interest or various significant social, political or economic matters; but shall not include any assembly of persons on private premises to which the public in general have no right of entry or any *bonafide* religious services;

(xii) "Public Procession" means and includes a Morcha, Picket or procession in a public place comprising pedestrians (wholly or in part) and vehicles of all descriptions, but shall not include a bona fide funeral or other religious procession;

(xiii) "Street Rally" means and includes an organized mass movement of a group of people (or either with or within motor vehicles, bicycles or tricycles) on pedestrian or traffic area of a street (road), boulevard, prospect or square for the purposes of drawing attention to any problems or for Public Meeting.

3. *Identification of Place.-* (*1*) The following place is specified as the "Designated Area" for conducting Dharnas, Agitations, Gatherings,

Meetings, Protests, Pickets, Morchas, Processions, assemblies, rallies, hunger strikes or any other form of protests during the designated period specified in those rules, considering the principle of minimum disturbance to the residents, traffic and adequate space for the protestors in a regulated manner.

"Azad Maidan Ground (Part), more particularly described in the Schedule appended hereto, opposite Mumbai Municipal Corporation's main office, within the Territorial Jurisdiction of Azad Maidan Police Station.

(2) No Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc. shall be allowed in area of Additional Commissioner of Police, South Region, Mumbai except at the above mentioned designated area.

(3) Any person participation in any Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc. Designated area shall not be considered as a person in police custody.

4. *Permission from Designated Officer.- (1)* Any person, association or organization which desires to organize or convene a meeting or Procession, hold Dharna at the Designated Area shall make an application to the Designated Officer in FORM-A, at least seven days in advance, seeking such permission therefor.

*(2)*The Designated Officer shall on receipt of an application examine the request and take a decision as to whether permission for the proposed Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc. shall be granted or not. The request will be considered and thereafter either allowed by issuing permission in accordance with Form–B or be rejected after recording reasons therefor.

(3) The Designated Officer before granting any permission under sub-rule (2) shall ascertain that:-

(*a*) the proposed Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc. shall not consider or interfere with other events organized by the Central Government, State Government or Local Government, or previously permitted meetings, processions, or pickets;

(*b*) the organization of the proposed Demonstration, Procession, Public Meeting, etc. in the expected time and location shall not cause significant problems for vehicular or pedestrian movement.

(*4*) The organization of the proposed Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc. in the planned time, location, and form shall not endanger the rights of others.

(*5*) The Municipal Corporation of Brihan Mumbai shall provide medical services, toilets, urinals, and drinking water to the protestors in the Designated Area.

(*vi*) Procedure for Considering the Application:

(a) Upon receipt of the Application seeking permission, the Designated Officer may forward the same to all the concerned authorities, including Municipal Corporation of Brihan Mumbai , the Fire Safety Officer, etc., calling for their Objection, if any, within three days of receipt of the intimation.

(b) The permission shall be granted on "First-cum-First-Serve" basis. The Designated Officer shall maintain a calendar with the details of the date, time, place and organizer of the Protest, Demonstration or Public Meeting, etc., so as to avoid overlapping of meetings.

(c) Every permission granted by the Designated Officer shall include specific and imposing obligatory terms and conditions. The Designated Officer shall be at liberty to include any further conditions upon any such request as he

deems fit in the interests of public safety, peace and tranquility.

(d) The Designated Officer may refuse to grant permission during Sessions of the State Legislature, VVIP or VIP movements, Republic Day, Independence Day, important Government functions, official festival days and New Year Day celebrations, etc. and on such other dates as may be specfied from time to time.

(e) The Designated Officer shall be at liberty to revoke the permission in case of unforeseen and sudden developments such as VIP Security requirements or any other intelligence inputs. The reasons for such revocation shall be recorded in writing and conveyed to the organizers.

(f) Agitations shall be allowed only for one day at a time and on Government working days only. No permissions shall be granted on Saturdays, Sundays and Government or Public Holidays.

(g) The Designated Officer shall be at liberty to specify the name or names of the person(s) or association of persons to whom such permissions is issued.

(h) The decision of the Designated Officer shall be final and binding on the organizer on all matters concerning the protests or demonstrations, etc.

5. *Vehicle entry and parking for protesters.*-The following conditions shall apply as regards the vehicles and parking for the protestors at the places of protest, demonstration, public meeting, etc.:-

(a) Parking of vehicles (if such space is available) may be allowed in consultation with the traffic police;

(b) No tractors, trolleys, bullock-carts, cycle-rickshaws or hand driven carts, goods carrier or heavy vehicles shall be allowed;

(c) No animals or birds like horses, elephants, camels, cattle,

chickens, etc. shall be allowed in a rally, protest, agitation etc.

6. *Restricting total number of protestors.*- (*1*) The maximum number of protestors permitted at the Designated Area shall be five thousand persons.

(*2*) multiple protests in a day may be allowed subject to availability of suitable timings;

(*3*) any organizer bringing in protestors in numbers in excess to those stated in the Undertaking as per Form A shall be seen as a deliberate attempt to violate the permission granted under these rules. Such Organizer and such protestors will be liable for strict legal action and consequences as permissible under the law. The Designated Officer may also be at liberty to reject any application made by such organizer or protestors in the future.

7. *No march towards and from the Designated Area.*- No march towards and from the Designated Area shall be allowed. The organizer shall ensure that the protestors or demonstrators congregate as well as disperse peacefully from the Designated Area only smoothly without disrupting regular traffic and pedestrian movement and without any demonstrations, sloganeering or otherwise raising any unrest of any nature whatsoever.

8. Use of loudspeakers and other Noisy Instruments.-

(a) No loudspeaker, public address system or Noisy Instrument shall be used at the venue of the rally, dharna, demonstration, public meeting etc. without specific permission from the Designated Officer.

(b) In case such permission is granted by the Designated Officer, the loud speakers or Noisy Instruments shall be permitted only within the permitted decibel as per the Noise Pollution (Regulation and Control) Rules, 2020 framed under the Environment Protection Act, 1986.

9. *Restriction on pitching tents and temporary structures.*- The protestors shall not be allowed to put up tents or temporary structures at the Designated Area for even a temporary period. However, in exceptional circumstances, the Designated Officer may permit the setting up of temporary tent or stage subject to strict compliance with removal and installation norms as directed by designated officer from time to time.

10. *Time Restriction.*- All permissions under these rules shall be granted for such hours between 9.00 a.m. to 6.00 p.m. only. The Designated Area shall remain vacant from 6.00 p.m. to 9.00 a.m. Any person in the Designated Area after 6:00 PM and before 9:00 AM shall be subjected to fines and/or imprisonment to such an extent as permissible under the applicable laws in force.

11. *Prohibitions.*- The following activities shall be strictly prohibited during any Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc., namely:-

(a) the participants shall not carry lathis, fire arms, spears, swords or any other articles which can be used as a weapon of offence;

(b) No gas, weapon, explosive substance, poisonous substance, flammable substance and/or vehicle shall be allowed inside the Designated Area;

(c) The participants may carry flags and banners with sticks but purely for display purposes. It shall be ensured by the organizer(s) that the dimensions of the flags or banners shall not be greater than nine feet x six feet and no stick used in the banners or flags shall be more than two feet in length. Objectionable placards or banners shall not be displayed in the program which may hurt the sentiments of other persons or community.

(d) No activity such as abusive or provocative speeches, making offensive video or audio recordings and broadcasting it through

social media or otherwise, shall not be allowed. No participants shall use any language likely to inflame passions of the crowd or incite them or promote enmity between different groups on ground of religion, race, place, birth, residence, language etc. or act in any manner prejudicial to the maintenance of harmony between such groups or may disturb public peace and tranquility.

(e) No participant shall attempt self-immolation or attempt to commit suicide or go on a hunger strike or take any steps whereby the life and limb of either such participant or anyone else is threatened or put in danger.

(f) No participant shall act in any manner which may result in damage to public property, assault on government servant, arson, etc. In case of any such damage the cost of repair and restoration thereof shall be recovered from such Organizer or Participants as per prevalent legal provisions.

(g) No participant shall burn any documents, books, effigy, etc., in the Designated Area.

(h) No participant shall cook any foods or litter in the Designated Area.

(i) All persons gathered or participated at Designated Area shall vacate said ground peacefully by 6:00 pm.

(j) In the case of *a procession within the Designated Area*, the Designated Officer shall be at liberty to impose such additional conditions and restrictions with regards to the route and times at which such procession may pass and such other conditions as it may think fit to impose.

(k) No participant shall gather or block carriage way and pedestrian pathway.

12. *Responsibility of Organizer(s).-*

(a) Every person or association to whom permission is issued

under the provisions of these rules shall be responsible for the due observance of all the conditions specified in the permission as the Designated Officer may impose on that behalf. In event of breach or violation of any of the terms and conditions on which the said permission has been granted, every such person or association to whom the permission has been granted and who was member of the assembly would be liable for action being initiated against them under the relevant provisions of the Act and the Bhartiya Nyaya Sanhita, 2023 (45 of 2023).

(b) The Organizer shall work in coordination with the public authority and cooperate with the authorities under all circumstances.

(c) As stated aforesaid, the organizer shall ensure that the maximum number of participants in the Designated Area shall not exceed the number of participants mentioned in Form A.

(d) The Organizer of the event, manager, assistants to the manager and persons for maintaining order shall be present in the Designated Area throughout the event.

(e) The Organizer may form a delegation of maximum upto five persons, who may be taken to concerned available Government Authority for submission of memorandum of their demands.

(f) If the protestors infringe the provisions of these Rules and do not obey the instructions of the Organizer, the Organizer shall either declare the event to be closed, or turn to an employee of the police or representative of the local Government to restore order.

(g) If the protestors of the event do not obey the instructions given by an employee of the police or representative of

the local government regarding compliance with the requirements of these Rules, the member of the police or representative of local Government shall declare the event to be closed, or shall demand that participants thereof to leave the Designated Area of the event and shall thereafter proceed to initiate such legal action against the protesters as may be permissible under the applicable Laws.

13. *Powers of the Designated Officer.*- Any police officer, upon the directions of the Designated Officer may stop any procession for which no permission has been issued under the provisions of rule 4 of these Rules or which contravenes any of the conditions specified in the permission so issued, or which has been convened or is taking place in contravention of an Order made under these rules or any of the conditions specified in such Order, or which contravenes any other Law, and may order such procession to disperse. In such event, the Designated Officer may use necessary force to vacate the participants from the Designated Area and other surrounding areas.

14. *Post-Event Measures.*- After the Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies and Processions etc., all concerned Government agencies shall ensure the following measures.-

(a) Undertake cleaning work and restore normalcy at the earliest;

(b) Recover compensation towards damage to environment or the public property, if any, from the organizer as per prevalent legal provisions; and

(c) in case of any violation as above, necessary legal action shall be initiated including but not limited under the Prevention of Damage to Public Property Act, 1984 (3 of 1984).

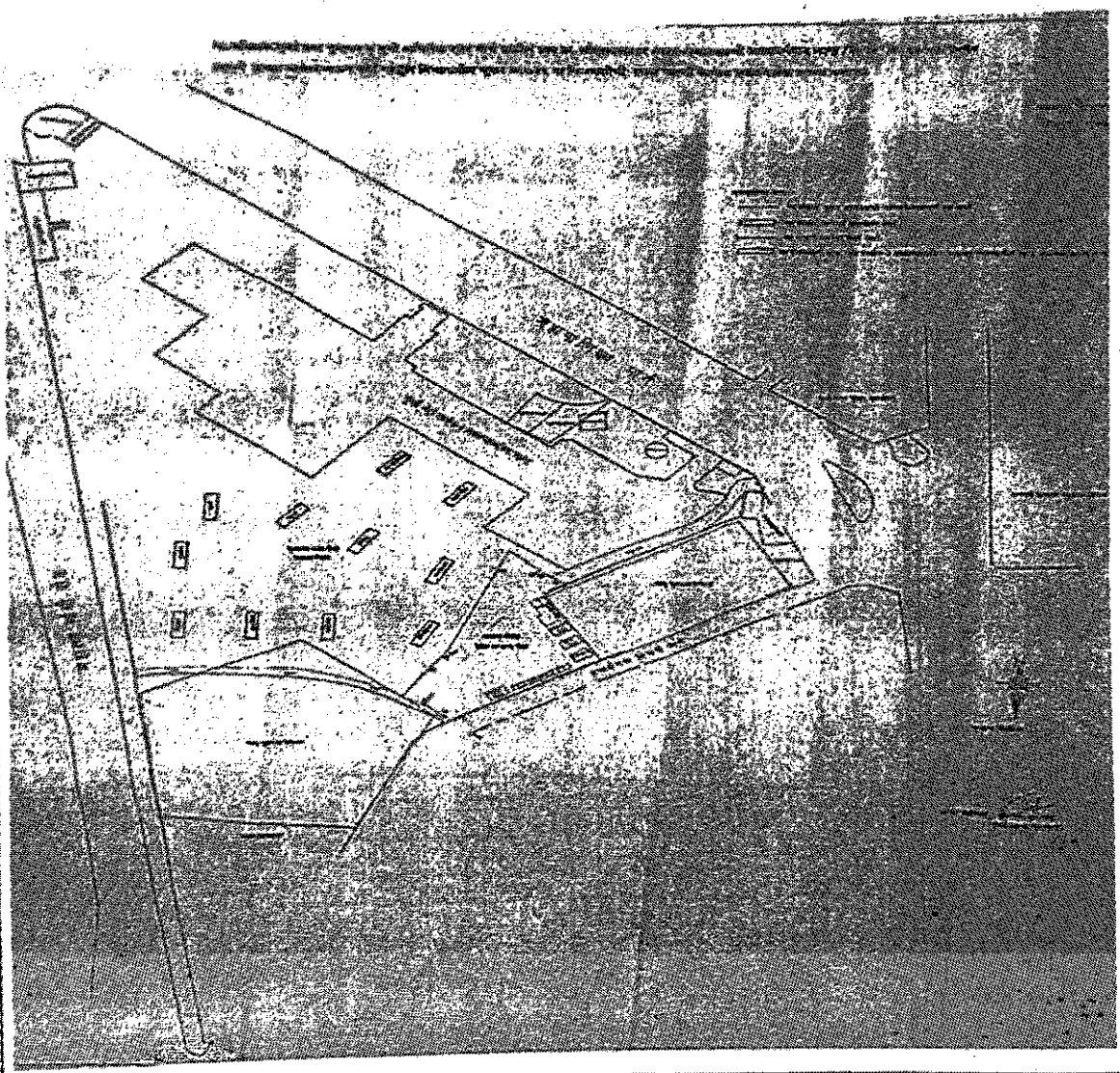
SCHEDULE

(See rule 3)

LOCATION OF DESIGNATED AREA AT AZAD MAIDAN

Allotted area of Azad Maidan Ground :

A. **To the West direction: Ground of Bombay Gymkhana;**
B. **To the East direction: Municipal Corporation of Greater Mumbai.**
C. **To the South direction: Hajarimal somani marg.**
D. **To the North direction: Metro Railway Project Area.**



Latitude:- 18.939428° **Longitude:- 72.832677**

FORM A

(See rule 4(1))

APPLICATION FOR PERMISSION TO HOLD PUBLIC MEETING / PROCESSION/ DHARNA / DEMONSTRATION, ETC.

1. Full Name of Applicant .....

2. Address of Applicant .....

3. Application made on behalf of: (self or organization) .....

4. Whether for public meeting and/or public procession, etc.

5. Commencing at (time) ..... ending at (time) .....

6. If meeting, location of meeting .....

7. If procession, description of place of assembly, route, and place of dispersal .....

8. Maximum number of persons and vehicles participating in meeting/ procession .....

9. Details of any Band, Loudspeaker, Banner, Placard, Emblem or Flag wished to be used during meeting/ procession .....

10. Names of persons who will organize and assist to organize meetings/ procession .....

11. Reasons for public meeting/procession.....

12.concerned Goverment Department (if any)

Date) .....

.....

(Signature of Applicant)

_____

FORM B
(See rule 4(1))

UNDERTAKING BY THE ORGANIZER

Date of Programme ——————————

Venue of Public Meetings, Gatherings, Morchas, Agitations, Demonstrations, Dharnas, Rallies, Processions, etc. ——————————

Time w.e.f. —————— Hours To ..... Hours ——————

No. of Participants ——————————

No. of Volunteers ——————————

I , ... (Name and designation of the Organizer) of the .....(Name of the Organization) do hereby undertake that I have been authorized by the Organization as representative to organize the dharna /demonstration to be held on —————————— I undertake that I shall abide by the Maharashtra Police Act (XXII of 1951), the Public Meetings, Agitations and Processions (within jurisdiction of Additional Commissioner of Police, South Region, Mumbai) Rules, 2025 and the following terms and condition, namely:-

1. I shall carry the permission granted in original to be shown to any police officer on duty on demand.
2. I shall depute a responsible person with whom the police can liaise ——————————
——————————(Name designation and telephone number of the liaison person deputed by the organizer)
3. I shall make adequate arrangements for drinking water (by providing tankers) and First Aid /medical Aid in consultations with the civic/local bodies at the site and also during the dharna/demonstration.

4. I and other organizers shall ensure that the dharna, demonstration, etc., will be in orderly manner and not cause impediment to the normal flow of traffic and also follow the parking and traffic rules.

5. I, and others shall keep the limit of gathering of participants in dharna, demonstration, etc., upto the number specified in my application ONLY and will not exceed the same under any circumstances.

6. I, and other organizers shall ensure that the sufficient number of volunteers shall be deployed at and around the venue to assist the police and also provided the list of volunteers with contact details to the police in advance.

7. I, and other organizers shall ensure that dharna, demonstration, meeting, etc., shall only be held at prescribed place/venue.

8. I, and other organizers shall ensure that the dharna, demonstration, etc., will be held in prescribed time period i. e. 9.30 am to 5.30 pm.

9. I, and other organizers shall not use the stick for flags/banners etc. more than 2 feet in length. The dimension of flags/banners shall be 9 ft. X 6 ft. or smaller. The participants may carry flags, banners etc. on sticks purely for display purposes.

10. I, and other organizers shall ensure that the participants in the dharna, demonstration, etc., will not carry lathis, firearms, spears, swords and other articles which likely to be used as a weapon of offence. I shall ensure that no participant is carrying any imitation firearms or any other firearm which may cause danger to human life or safety or disturbance of public tranquility or a riot.

11. I, and other organizers shall ensure that no participant shall make provocative speeches or use language calculated or likely to inflame passions of the crowd or incite them or promote enmity between different groups or ground of religion, race place or birth, residence language etc. or act in any manner which is prejudicial to the maintenance of harmony between such groups or disturb the public tranquility.

12. I, and other organizers shall ensure that participants of the dharna, demonstration, etc., shall immediately comply with all lawful directions given to them by Commissioner of Police, Mumbai or any other Police Officer on duty at any stage of the rally or dharna/demonstration, etc.

13. I, and other organizers shall ensure that no participant shall act in a manner as to result in damage to public property, assault on Government servant or obstruction of duty of Government servant, arson, etc. or any other thing which is in transgression of law.

14. I, and other organizers shall ensure that no participant destroys, damages or defiles any place of worship or any object held sacred by any class of persons with the intention of thereby insulting any religion or any class of persons.

15. I, and other organizers shall not move in the shape of march from the prescribed place of dharna, demonstration. During this, I and other organizers shall abide the instructions/directions of the police.

16. I, and other organizers shall not burn any kind of documents, books and effigy and shall not indulge in cooking, littering, throwing of placards, banners and plastic waste.

17. I, and other organizers shall ensure that no loudspeakers or public address system shall be used at the venue of the dharna, demonstration without specific permission and loudspeakers shall be used only between 9.30 a.m. to 5.30 pm for which permission has been granted by the Designated Officer.

18. I, and other organizers shall ensure that no vehicle including tractors, trolleys, bullock-carts, cycle-rickshaws, hand driven carts, or animals or birds like horses, elephants, camels, chickens etc. are brought in the dharna, demonstration, etc.

19. I shall be responsible to keep the followers under control, failing which I along with other organizers shall be prosecuted under the existing provisions of law.

20. I and other organizers shall abide the guidelines of undertaking and co-operate the police in all circumstances.

Date .....

Place .....

_____

(Signature)

_____ (Name in CAPITAL LETTERS)

_____ (Designation)

..... (Name of the Organization)

Mob. No. _____

Any other Telephone No. _____

Commissioner of Police
Brihan Mumbai.



ON BEHALF OF GOVERNMENT PRINTING, STATIONERY AND PUBLICATION, PRINTED AND PUBLISHED BY DIRECTOR, RUPENDRA DINESH MORE, PRINTED AT GOVERNMENT CENTRAL PRESS, 21-A, NETAJI SUBHASH ROAD, CHARNI ROAD, MUMBAI 400 004 AND PUBLISHED AT DIRECTORATE OF GOVERNMENT PRINTING, STATIONERY AND PUBLICATIONS, 21-A, NETAJI SUBHASH ROAD, CHARNI ROAD, MUMBAI 400 004. EDITOR : DIRECTOR, RUPENDRA DINESH MORE.



IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT: - MUMBAI

IMRAN KHAN PAL **...Petitioner**

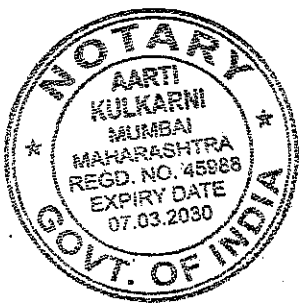
Versus

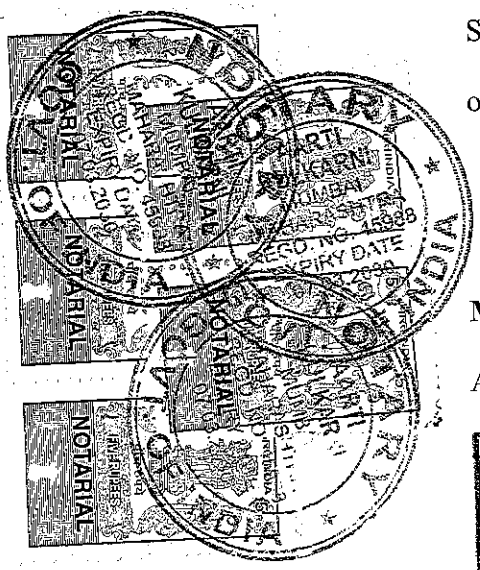
UNION OF INDIA & ANR. **...Respondents**

AFFIDAVIT IN SUPPORT

I, Imran Khan Pal, do hereby affirm and state as follows:

1. I say that I am conversant with the facts of the present Petition, from the files and records of the Petitioner, and am able to depose to the same.
2. The present Petition is filed for the reliefs more particularly stated therein. For the sake of brevity, I repeat, reiterate, maintain and confirm averments in the Petition as if these form part of this present affidavit.
3. I crave leave that the Writ Petition be deemed incorporated in this Affidavit.
4. I say and submit that in the circumstances of the present case, the reliefs as prayed in the present Petition, be granted.





Solemnly declared at Mumbai)

on this 17th day of October 2026)

Imran Khan Pal

Deponent

MZM LEGAL

ADVOCATES FOR THE PETITIONER

NOTED & REGISTERED
Sr. No. 417 Page No. 46
Dated 17/10/2026

Before me,

BEFORE ME

AARTI KULKARNI
NOTARY (GOVT. OF INDIA)
HIGH COURT, MUMBAI
702 Shree CHSL Paranjape A Scheme Road No. 1,
Opp. Parleshwar Post Office Subhas Road,
Vile Parle (East), Mumbai - 400 057.

IN THE HIGH COURT OF

JUDICATURE AT BOMBAY

ORDINARY ORIGINAL

CIVIL JURISDICTION

WRIT PETITION (OS) NO.

_____ OF 2026

Imran Khan Pal

...Petitioner

Versus

Union of India and Anr.

...Respondents

AFFIDAVIT- IN - SUPPORT

This 15th day of October 2026

MZM LEGAL

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Kalaghoda, Mumbai 400001
Tel: +91 22 22643333/6666
lawyers@mzmlegal.com
Advocate Code: I-1778
OS Registration No: 10245/2008

M Z M L E G A L

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL JURISDICTION
WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT: - MUMBAI

Imran Khan Pal ...Petitioner

Versus

Union of India & Anr. ...Respondents

ADVOCATE'S CERTIFICATE

TO,
THE PROTHONOTARY & SENIOR MASTER,
HIGH COURT (ORIGINAL SIDE), BOMBAY

I, Parvez Memon, Advocate for the Petitioner, do hereby certify and state that the issues involved in the present Writ Petition are required to be entertained by the Hon'ble Division Bench mainly because in the aforesaid Writ Petition, the Petitioner is seeking to issue certain directions under Article 226 and Article 227 of the Constitution of India, 1950, on several grounds and more particularly described in the Writ Petition and as such, contemplated under the amended Rule 636(I) of the Bombay High Court Original Side Rules. The aforesaid Writ Petition is required to be placed before the Division Bench as the issues involved in this Writ Petition can be adjudicated by the Division Bench.

MZM LEGAL

Mumbai

Dated this 17 day of October 2026

MZM Legal

Advocates for the Petitioner

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL JURISDICTION

WRIT PETITION (OS) NO. _____ OF 2026

DISTRICT: - MUMBAI

Imran Khan Pal ...Petitioner

Versus

Union of India and Anr. ...Respondents

WRIT PETITION

Dated this 7 day of October 2026

Advocates for the Petitioner

MZM Legal LLP
Level 6, One Forbes, Dr. V.B.Gandhi Marg,
Kalaghoda, Mumbai 400001.
Email: lawyers@mzmlegal.com;

MAH/10-LF/2017