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To

10-5-22

M/s Nowfil, B. Tech., B.L., A. Mohamed Faisal, BSC., B.L.,

& Ahamad Ismail, B.SC. MBA., LLB,

Advocates, No. 172, 2nd floor, Near Karnataka Bank,

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Chennai-60001

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1. Apropos the notice issued by You dated 17-3-22 on behalf of Your Client Popular Front of India, having its office at No: 33 , 3rd Floor, Mookathal Street, Puraisaiwalkam, Chennai-7 represented by its Zonal Executive Council Member, Mr. Samsudeen, Chennai, Tamil Nadu, to me, as the Representative of the Sufi Islamic Board, I hereby give my points of rejoinder which are as infra:

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2. At the inception, I deny all the contentions of your client except those that are specifically admitted herein.
3. In response to your client's description contained in paragraphs 1 to 3, suffice it is to say that naked violence, communal disharmony et al are the hallmark of Your Client which goes against Your client's self styled proclamation of being an organization "to promote national integration, communal amity and social harmony and rule of law in the Country". Your client's contention that " It adopts only democratic agitations against the anti people policies of the Government and resorting to legal courses before the Courts of law at all levels, which are permitted by the Constitution of India as the fundamental rights of the citizens", is belied by the plethora of criminal cases filed ranging from murder to bomb making and proved against the cadres of Your client. Would your client care to reply as to how such violence fits in to the ethos of an organization which putatively is promoting "national integration, communal amity and social harmony and rule of law in the Country" and which adopts "only democratic agitations against the anti people policies of the Government and resorting to legal courses before the Courts of law at



all levels, which are permitted by the Constitution of India as the fundamental rights of the citizens”?

4. In response to your client's instruction at paragraph 4 of your notice, I wish to say that neither did I give any interview to the Hindu nor caused the news to be published or printed. However I did sent a representation to the DGP, Tamil Nadu Police and apprehending that permission may be given, I did approach the Honble High Court, Madras. The averments made in the High Court, Madras are true, privileged and comes within the confines of exception to defamation. Kindly advise Your client that to brow beat a bonafide citizen litigant is itself an offence of criminal intimidation.

5. Your client, at paragraph 5, has summarized the so called allegations levelled by me against his organization, the PFI, and my stout retorts are as under:

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A	<p>PFI of</p> <p>having links</p> <p>with</p> <p>Turkish</p> <p>Jihadist</p> <p>group Insan</p> <p>Hak Ve</p> <p>Hurriyetleri</p> <p>Ve Insani</p> <p>Yardum</p> <p>Vakfi</p> <p>popularly</p> <p>known as</p> <p>IHH, AI</p> <p>Qaeda linked</p> <p>Charity</p>	<p>In fact in 2020 this information was shared by my friend Mr. Abdullah Bozkurt who is a journalist of International repute now living in Sweden. This was given wide publicity by almost all TV, Print and Social Media in India.</p> <p>On 17-11-2020 Live debates were held in Republic TV (https://www.youtube.com/watch?v=2HwsopWYgFY), News Nation (https://www.youtube.com/watch?v=fbItzipXW0) Capital TV (https://www.youtube.com/watch?v=2n83JPYduz1).</p> <p>The online news media also carried this news.</p> <p>The PFI neither denied this nor sent any defamation notice to the Media house or person because the photographic evidences were beyond challenge. Having remained stoically silent from November 2020, the threatened defamation case has lost its legal virility.</p>
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B	<p>E.M. Abdul Rahman and P. Koya, two key leaders of PFI, were privately hosted in Istanbul in 2018 by IHH whose Turkish name stands for Foundation for Human Rights and Freedom and Humanitarian Relief.</p>	<p>The photographs of the meeting between IHH and PFI were made available to the Media by M. Abdullah Bozkurt who has been in the forefront of exposing the link between International terrorism and Erdogan, the President of Turkey. The same was broadcast by Visual Medial and in print media. Not a whimper from Your client was heard from 17-11-2020 when the photographs were carried by the Indian Press. Nor has Your client filed any defamation case against the Presspersons who hooted from roof tops about your Jihadi connections. Truth had silenced your client.</p>
C	<p>PFI was found to be</p>	<p>Syed Ismail Afaque who was arrested in January 2015 , had disclosed that he had sent PFI cadres</p>

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<p>involved in the 2011 bombings, the 2012 Pune Blasts and the Dllsuknagar attack.</p>	<p>to buy explosive which were used by IM to cause the Mumbai Blast. He also admitted that Saddam of PFI procured explosives for the Pune and Hyderabad Blasts. This was given wide publicity in the media. The Times of India, a reputed News Daily , also carried this article on 27-3-2015. Neither the PFI has issued any denial nor threatened legal action against the News Daily which reminds me of an adage that best personifies the PFI- stung by the scorpion the burglar had no choice but to remain silent! .</p> <p>https://timesofindia.indiatimes.com/india/popular-front-of-indias-role-in-2011-mumbai-2012-pune-2013-hyd-blasts-found-intel-agencies/articleshow/46710055.cms.</p>
<p>D PFI shared its ideology with the Muslim Brotherhood,</p>	<p>In 2015 the Popular Front leaders protested before the Egyptian Embassy in New Delhi over the death sentence given to the Qatar based international terrorist Yusuf Al-Qaradawi in absentia and the ousted President Morsi of</p>

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<p>an International terror organization banned in Egypt, Syria, Saudi Arabia and so on.</p>	<p>Muslim brotherhood.</p> <p>https://popularfrontindia.org/?q=tue-05192015-2015</p> <p>Your client is fully aware of the antecedents of Yusuf Al Qardawi, the mentor of Muslim brotherhood and Mr. Morsi, of the Egyptian Muslim Brotherhood.</p> <p>Your client is aware of the fact that Yusuf Al Qardawi supports terrorism in Kashmir. In 2009, Mr. al-Qaradawi had issued a fatwa, or religious edict, asserting that “the Kashmiris were properly fighting jihad against the Indian army.” The jihad was legitimate, he argued, since mujahideen groups sought to create an Islamic state. Therefore, the edict concluded, it was incumbent on all Muslims to help Kashmiris gain their “freedom from Indian aggression.”</p> <p>https://www.thehindu.com/news/mediator-in-talibanus-talks-backed-kashmir-jihad/article2755817.ece</p>
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<https://www.greaterkashmir.com/news/more/news/qaradawi-says-k-fight-is-jihad/>

Your client is aware of the role played by Yusuf Qardawi in killing Col Qaddafi and establishing a reign of terror in Libya Yusuf Al Qardawi who has also issued fatwa religious edict to Kill President Qaddafi of Libya.

<https://www.smh.com.au/world/cleric-issues-gaddafi-kill-fatwa-20110222-1b2vw.html>

But Qardawi was stopped in his stride by Lion hearted Dr. Bashar Assad who pulverized Jihadis in Syria supported by the former.

May I ask Your client as to why the PFI had protested in favour of Muslim Brotherhood terrorists like Yusuf Qardawi and Late Morsi if PFI were not sharing their ideology with the Muslim Brotherhood. Does Your organization consider the Muslim Brotherhood as of ill repute? Has my averment that PFI shares its ideology with the former lowered your reputation in the eyes of the Public? If yes then the PFI had defamed itself by protesting before the Egyptian Embassy in New Delhi over the

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		<p>death sentence given to the Qatar based international terrorist Yusuf Al-Qaradawi in absentia and the ousted President Morsi of Muslim brotherhood.</p> <p>Your client's association with Muslim Brotherhood shows it has no good reputation to brag about.</p>
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6. Your client has stated that "After reading the news item so may public personnel were contact me and asked about the news. Your news item caused damages to the good faith upon our organization among the general public" but I wonder whether Your client has any repute. I take umbrage at the expression 'Your news' because it was neither published by me nor did I caused it to be published. Besides your connections with International terror outfit like IHH, Yusuf Qardawi etc , the public are well aware about the NIA charge-sheet in which at least 47 members of the PFI and SDPI were arraigned as accused .
- <https://timesofindia.indiatimes.com/city/bengaluru/riots-case-nia-arrests-17-sdpi-pfi-functionaries/articleshow/79845905.cms> or the [2010 axe attack](#) on Professor T.J. Joseph, in Kerala's Idukki district in which Your cadres were convicted by the NIA Court, or even the fact

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that 21 PFI members were convicted by a special NIA court in Kerala for organizing a terror camp in Kannur in 2013.

[https://www.thenewsminute.com/article/21-pfi-activists-convicted-](https://www.thenewsminute.com/article/21-pfi-activists-convicted-organising-terror-camp-kerala-38004)

[organising-terror-camp-kerala-38004](https://www.thenewsminute.com/article/21-pfi-activists-convicted-organising-terror-camp-kerala-38004). Your client is well aware that the Public is not ignorant of Your 'activities' and the attendant ill repute. The pernicious activities of your client is been carried to living rooms of the public by the Media. The alleged defamatory contents made by me must be déjà vu/ deja entendu for them.

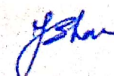
7. In response to your client's fulminations in paragraph 7, it is enough to say that the affidavit before the Honble High Court consists of unadulterated facts and no offence could be imputed in view of the bona aide intentions. The contents in the affidavit about Your client were already a subject of media debate and Your client in the face of uncontroverted facts, chose to remain silent and neither offered any defence nor took any offence. Further I request your to remind your client that even a perfectly legal organization can be banned under UAPA a la Zakir Naik's IRF and not to live under the delusion that an organization registered under an Act cannot be banned .

8. I wholly deny your client's contention in paragraph 8 that the case before the Honble High Court was untrue and the sole intention was

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to malign and defame the organization by making slanderous statements and harmed the reputation of the organization'. I am aware of perjury and would never make an untrue or malicious / scurrilous statement before any Honble Court. The averments are borne by hard facts and they are true. Besides they are privileged . The constitutional duties have inspired me to approach the Police and the Honble High Court with a view to stalling your client's terror ideology which is deceptively wrapped in the façade of patriotism and human rights. The contents which your client considers defamatory were in public domain and Your Client has rightly remained silent in view of the truth contained therein. I wonder what reputation is there for an organization whose members are convicted by courts, charge sheeted by investigating agencies, raided by ED , which shamelessly supports Yusuf Qardawi who issued fatwa to kill Col Qadafi and destroy the Socialist Republic of Syria and in turn is relied on by International Terrorist Al Massari to launch Jihad in India.

9. I deny the allegation that I am actuated by malice and speak the language of the ruling party. May I remind you that concerned citizens cutting across party lines have called for a ban on your client's organization. As recently as April 2022, a delegation of Congress



MLAs and MLCs met the Chief Minister of Karnataka seeking a ban on Your client's organization. <https://theprint.in/politics/karnataka-congress-leaders-meet-cm-bommai-demand-ban-on-sdpi-pfi/897926/>.

Would Your client also dub the Congress Party delegation as speaking the language of the ruling party? Way back in 2010 itself the then Kerala Chief Minister Comrade V S Achuthanandan said that Your Client, the Popular Front of India (PFI), was aiming to convert Kerala into a Muslim-majority state in the next 20 years. The then Home Minister Balakrishnan of the LDF Government said that PFI was trying to inflame communal passion and religious sentiments.

<https://www.deccanherald.com/content/83631/bid-convert-kerala-muslim-state.html>

10. In response to your clients dilemma that because of such allegations made by me, the people look at your client and his organization with an eye of suspicion for his association with PFI, I can only say that these are figments of Your client's wishful imagination that his organization has any iota of fame. I demand clinching evidence that Your Organization has any good repute. The behaviour of the people towards your organization is equally imaginary. Your client wants to create a myth that public are blissfully ignorant of the multiple convictions of cadres belonging to Your client, charge sheets filed

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against them for offences ranging from murder to terrorism and raids conducted against Your organization during the past decade some even during the congress regime. I emphatically state that Your client has nothing but ill repute for the saga of communal crimes like murder indulged by it.

11. I take serious note of the allegation by your client that my "activities clearly established that you are having back and call of the erring officials in the government sector agencies (sic)". In fact these statements are per se malafide and defamatory. In fact this a classic case of character assassination. That Your client's organization advocates secularism is a parody of sorts for the simple reason that your client supports Muslim brotherhood's rule in Egypt and oppose Secular Governments in Egypt , Syria, Algeria, Tunisia, Bangladesh etc.

12. Your client is trying to score some brownie points by claiming that there is no finding against the PFI by a Judicial forum. In S.C. No.2 of 2013 the Special Court for N.I.A. Cases, Ernakulam, convicted Your cadres. So much to prove your client's ardent patriotism and nationalism. The case was filed by the government which is not currently in power at the Centre.



13. Your client's denial of its association with the IHH is akin to Yusuf Qardawi denying any link with the Muslim Brotherhood. The leaders of Your client's organization met the IHH fully knowing about the antecedents and with a view to widening the ambit of Jihad. Ali Fuat Yilmazer, former head of the police intelligence department of Turkey specializing in extremist religious groups, testified in a Turkish court hearing on 16 August 2016 that "IHH campaigns are designed to provide assistance to jihadists engaged in terrorism worldwide and to provide medical assistance, finance, logistics and human resources to jihadists." He himself had provided detailed reports on the relations of the terrorist organization IHH with Erdoğan when he was Prime Minister.
14. Your client is well aware that the links of IHH and ISIS have also been established in a court case in Turkey, according to the testimony of a Turkish woman named Merve Dünder, wife of ISIS militant Mahmut Gazi Dünder, who testified in court that HRA provided logistical supplies to ISIS – controlled areas. She claimed that she "was distributing IHH supplies to those in need." Secret documents also stated that the "IHH" organization sent weapons to Islamist groups in Libya, using a ship to deliver humanitarian supplies.



<https://moderntokyonews.com/2021/07/01/ex-isis-brides-further-link-ihh-aid-organization-to-terrorists/>

15. Your Client knows that Russia revealed the irrefutable involvement of the "IHH" organization in terrorist activities, according to intelligence documents submitted to the UN Security Council on February 10, 2016, Russian Ambassador Vitaly Churkin, the then-permanent representative to the UN, wrote to the UN Security Council furnishing the license plate numbers of trucks dispatched to Syria by the IHH loaded with arms and supplies bound for jihadist groups including the Nusra Front. <https://www.dw.com/en/russia-claims-turkish-ngos-are-main-supplier-of-extremists-in-syria/a-19159685> . This was given wide publicity by both the Indian and International Media. Being an ally of Terror gangs in Syria, Your client and its ilk SDPI carried out large scale protests against Russia both in Tamil Nadu and India. <https://twitter.com/Nabha18208960/status/969993484873551873>.

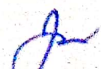
16. Your client is fully aware that the IHH's Qatari paymaster, Eid Charity, is also the subject of controversy over its links to terrorist groups. <https://ihh.org.tr/en/news/ihh-qatar-charity-strategic-cooperation-agreement-2503>. Its founder, Abdulrahman al-Nuaimi,



was designated a global terrorist by the US Treasury on December 18, 2013. The Treasury Department stated that al-Nuaimi provides significant financial support to Al-Qaeda in Iraq, Somalia, and Yemen and acts as an interlocutor between Al-Qaeda leaders in Iraq and Qatar-based donors. On September 23, 2014, the UN Security Council's Al-Qaeda Sanctions Committee also added his name to its list of individuals and entities subject to targeted financial sanctions, a travel ban, and an arms embargo. Several other Eid Charity officials were also accused of sponsoring terrorism.

17. Your client knows that Al-Nuaimi worked closely with Ali bin Abdallah Al-Suwaidi, another Qatari national and the general manager of the Eid Charity Organization. In June 2017, Al-Suwaidi was designated as terrorist financier in a joint list drawn up by Saudi Arabia, Egypt, the United Arab Emirates, and Bahrain.

18. On 7th of April at 11.15 pm the Sufi Islamic Board received a Tweet on its Official Twitter Handle stating "For siding with Hindutva-Brahman supremacist fascism against Muslims ie Hijabi Muslim school girls & Popular Front of India etc the @sufiboard exposed themselves as munafiq kaffirs". Along with this Tweet, some other Tweets were also tagged to PFI and its state units. In one of the tagged tweets there is a copy of a letter/statement attached with the heading



"Letter to the Popular Front of India. Disregard Bans and re-organise into a Revolutionary Army... in the coming civil war"

19. Your client is aware that the letter which was sent to your client, it is said that Jihad against the Indian regime is the right of all Muslims on Earth and it is positive to see Muslims in India mobilising under The Popular Front of India. The letter continues: " as such, Muslims in India have the Islamically legitimate right to carry out insurgency, sabotage and and espionage against the officials of the of the Indian regime involved in the oppression and as well as soldiers and Police officers enforcing oppression."

20. In this letter it is also said that already the "Sufi Islamic Board (Shaukat Ali) has criticized Popular Front of India for radicalizing the Muslims. it is the fascist BJP / RSS Hindutva Brahmin supremacist policies which are alienating the Muslims and if groups like Sufi Islamic board do not fall in line behind the project to protect the Muslims of India from prosecution and potential genocide they should be dismissed as munafiq(hypocrites) / Kafir(non muslims) which the treacherous Shaukat Ali (Advisor, International Affairs, Sufi Islamic

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Board) has clearly shown to be'... "To achieve in house cleaning must also be done (Euphemism for killing opponents)...if war should erupt and if they and the enemies of Islam and Muslims either militarily or through propaganda they can be treated as HarbiWarriors / munafik / kafir and can be engaged militarily along with other forces engaged in the operation of Muslims."... "You should investigate and implement to the best of your capacity new high tech advances in drone, ,cryptocurrency and 3D printing etc to provide you with a an advantage in the battle field".

21. Your client is fully aware that Al Massari fled Saudi Arabia for London. The press release from a March 2004 BBC radio interview with al-Masari indicates al-Masari told the BBC interviewer that assassinating British Prime Minister Tony Blair would be "legitimate" since Prime Minister Blair commands the British army, which is currently deployed in Iraq. The press release also states that "[i]n the wake of 9/11 Al Massari confirmed he had helped Osama Bin Laden establish an office in London in 1994" and that al-Masari uses the CDLR web-site "to justify violent attacks" (BBC 7 Mar 2004). In the wake of 9/11 Al Massari confirmed he had helped Osama Bin Laden establish an office in London in 1994. In December 2001 he told the Five Live Report: "They came and said we want to do political work,

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we want to have an office like you. We said you're welcome."Can you give us help? Absolutely. And within one week they were up and running so he [Osama Bin Laden] gave a phone call to thank for the support."The Five Live Report asked Al Massari why he had helped Bin Laden.He responded: "It's the same cause. It's the same ideas."Asked whether he would help him again Al Massari replied: "Yeah, if we can help anything, why not?"https://www.bbc.co.uk/pressoffice/pressreleases/stories/2004/03_march/07/fivelive_report.shtml

22. Your client is aware that the US Citizenship and Immigration Services cites a report that a satellite phone used by Osama bin Laden to orchestrate the 1998 U.S. Embassy bombings in Kenya and Tanzania belonged to Al Massari An October 2002 Australian press report, cited by the USCIS, states that a suspected al Qaeda member, who had been wanted by Saudi security forces "for belonging to the London-based militant Islamic group, the Committee for the Defence of Legitimate Rights (CDLR) whose leader, Professor Muhammad Al-Massari, publicly endorsed the political aims of bin Laden," was deported from Australia. According to the U.S. Department of State's report on human rights in Saudi Arabia in 1997, "Al-Masari sympathized with the terrorists who carried out of two fatal terrorist

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bombings of American military facilities in 1995 and 1996 and sympathy for the perpetrators" (U.S. DOS 30 Jan 1998).

<https://www.uscis.gov/archive/ric-query-saudi-arabia-16-june-2004>.

23. As an organization which promotes "national integration, communal amity and social harmony and rule of law in the Country", Your client is fully aware that Al Massari's call for jihad, insurgency, sabotage, espionage, against India is unlawful activity as defined under UAPA 2(o) which is punishable under section 13 of UAPA. As an organization standing for "communal harmony", Your client is aware He has also committed sedition as he has brought hatred or contempt, disaffection towards the Government of India. He has promoted enmity between different groups on grounds of religion punishable under Section 153A IPC . He has incited others to commit terrorist activity like use of drone, 3D printing(counterfeiting) , killing army and police officers punishable and cyber terror, under section 15 of UAPA and 66F IT Act respectively. By supporting the Taliban, especially the Haqqani Network, he has shown support to an organization banned by the UNSC.

24. As a "law abiding Organization", Your Client knows that Al Massari has deliberately circulated this statement with intent to cause mutiny

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in the Defence forces and to create fear or alarm in the public or to induce others to commit offences against the State to incite the misguided elements among the Muslims to commit offence against the Hindus which is punishable under section 505 IPC.

25. Your client which believes in human rights is also aware that the statement also criminally intimidates the members of Sufi Islamic Board and me for performing their constitutional duty of fighting disruptive and terrorist forces, Yet Your client remained silent which amounts to agreement with Al Massari, The Letter itself shows that there is a nexus between the Popular Front of India and Terrorists Organizations of the World and together they want to spoil the National Fabric of our Nation. The tweets were also tagged to Your client PFI but so far the PFI has not come forward disapproving the tweet which shows an undeniable nexus and decimates your client's contention that it stands for "national integration, communal amity and social harmony and rule of law in the Country .

26. Like birds of a same feather flying together, Al Massari has chosen to address PFI not any other organization in India to launch a Jihad against the Government. From Al Massari's clarion call to PFI to launch Jihad, any reasonable mind can come to conclusion that PFI is

being held in high esteem by like minded terrorists and that it has no good repute. From a conspectus of the above, it is clear as daylight that the PFI harbours ill will to communal harmony and wants to bring Global jihad in India in order to convert India into another Syria which I, along with others like minded people cutting along all lines, promise to foil your sinister ideals.

27. I reiterate that since Your client has no repute but ill repute, there is no question of defamation and as such there is no question of submitting unqualified and unconditional apology and payment of damage. The threat of criminal and civil trial is a criminal intimidation to me made with a view to preventing me from carrying out my Constitutional duties. Any legal misadventures by Your client, I assure you, will be stoutly resisted mulcting you for malicious prosecution .

Yours truly,

