

SR NO-2671/24
03.10.2024

IN THE COURT OF THE HON'BLE **SPECIAL** JUDICIAL MAGISTRATE OFF FIRST CLASS FOR EXCISE AT NAMPALLY, HYDERABAD

C.C. No. OF 2024

BETWEEN:

Shri. Nagarjuna Akkineni,
S/o. Akkineni Nageswara Rao,
aged about 65 years, Occ: Actor/Business,
R/o. Plot No.959-A, Road No.48,
Jubilee Hills, Film Nagar Road,
Shaikpet, Hyderabad - 500033,
Telangana.

... **Complainant**

AND

Smt. Konda Surekha,
W/o. Konda Muralidhar Rao,
Aged about 59 years, Occ: Minister,
R/o. H. No. 1-2, Vanchanagiri Village,
Geesugonda Mandal, Warangal District, 506 330.

... **Accused**

1. DATE OF OFFENCE : 02.10.2024
2. PLACE OF OFFENCE : Bapu Ghat, Langar Houz
3. NAME OF POLICE STATION : P.S. Langar Houz
4. NATURE OF OFFENCE : U/s 356 B.N.S
5. WITNESSES : 1. Complainant
2. Yarlagadda Supriya,
D/o. Yarlagadda Surendra,
aged about 48 years,
R/o. Plot No.102/A, Chiranjeevi
Blood Bank, Jubilee Hills Check Post
Shaikpet, Hyderabad-500033.
3. Venkateshwar Metla,
C/o. M Narsimlu, aged about 60
years, R/o. Flat No.304, 3rd Floor,
6-3-596/77/10/3/A & B, Tirumala
Gardens, Road No.1, Rangaraju
Lane, Banjara Hills, Khairatabad,
Hyderabad - 500034

PRIVATE COMPLAINT FILED UNDER SEC. 222 R/W SEC. 223 of
B.N.S.S.

(Offences Punishable u/s. 356 B.N.S.)

May it please your Honour,

1. It is respectfully submitted that the complainant is not just a household name in Indian cinema but a ~~prominent figure~~ ^{Prominent Personality} in the Telugu film industry, with an esteemed career spanning nearly four decades. He has garnered widespread recognition as a leading actor, producer, television host, and studio owner. Having acted in over 90 films across Telugu, Hindi, and Tamil languages, the complainant has established an undeniable reputation.
2. It is respectfully submitted that the complainant was born on August 29, 1959, into the illustrious Akkineni family, renowned for its foundational role in shaping Telugu cinema. As the son of the legendary actor Akkineni Nageswara Rao, the complainant has inherited a rich cinematic legacy. However, through his own efforts and talent, he has carved out a distinct identity.
3. The complainant submits that his illustrious career has been recognized with numerous prestigious awards. He has been honored with nine Nandi Awards, the highest accolade in Telugu cinema, three Filmfare Awards South, and a National Film Award (Special Mention).
4. It is submitted that the complainant's influence extends far beyond cinema. His stature as a philanthropist, entrepreneur, and television personality has made him an admired public figure. As the host of Bigg Boss Telugu and an investor in various sectors such as sports and real estate, the complainant has demonstrated his multifaceted talents. His philanthropic endeavors, particularly through his active involvement in the Blue Cross of Hyderabad, an animal welfare organization co-founded by his wife Amala, underscore his dedication to social causes. His contributions to the Telugu film industry as a producer have further



enriched Indian cinema by fostering new talent and introducing innovative storytelling techniques, making him a pivotal figure in the entertainment landscape.

5. It is further submitted that the complainant's family, much like the complainant himself, enjoys immense reputation and respect in the eyes of the public. The complainant's son, Naga Chaitanya, is a successful and acclaimed actor in the Telugu film industry, continuing the family's proud legacy in cinema. The Akkineni family is widely regarded for its contributions to Indian cinema, with generations of actors commanding admiration and respect. Additionally, Naga Chaitanya's former spouse, Samantha, is a celebrated actress with a significant following and an impeccable reputation in her own right. Although their marriage, solemnized in the year 2017 and widely covered by the media, ended in a divorce due to personal differences in the year 2021, both individuals continue to be respected for their professional accomplishments and maintain a dignified public image. The family's stature in the public eye remains undiminished, further enhancing the complainant's standing as a revered figure in Indian cinema.
6. As such, it is submitted that the complainant and his family enjoys immense respect and admiration from his peers, fans, and the public at large. His impeccable reputation has been meticulously built over decades of dedication, passion, and excellence in the entertainment industry. The complainant's personal integrity and professional achievements have contributed to his standing as a revered public figure. Any attempt to tarnish this reputation through false or malicious allegations not only harms his professional legacy but also deeply affects his personal life and the high regard in which his family is held. Therefore, protecting his honor and preserving his reputation is of paramount importance.
7. It is submitted that the Accused, Smt. Konda Surekha, is a well-known political figure and currently serves as the Minister for Forests, Environment, and Endowments in the Government of Telangana. She

9. It i
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represents the Warangal East constituency in the Telangana Legislative Assembly and has previously held various portfolios in different political parties. With decades of experience in the political arena, she is a prominent member of the Indian National Congress, having served previously in the Bharat Rashtra Samithi (BRS). Her political career spans leadership roles across different constituencies in Telangana, making her a key public figure with significant influence in the state. As a public figure and representative of the people, she holds significant influence, and her statements carry considerable weight in the public domain.

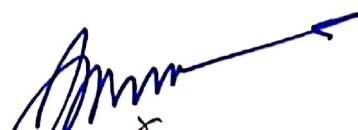
8. The Complainant submits using the public platform available to her as a public figure, the accused, while speaking to media on 02.10.2024, while attending Gandhi Jayanti Program at Bapu Ghat, Langar Houz, Hyderabad, made defamatory statements concerning the complainant and his family. The defamatory statement made by the accused is reproduced below along with its translation in English for the sake of convenience:

Original Statement in Telugu:

“నాగ చైతన్య డివోర్స్ 100% కే.సి.ర్ చేయబట్టే కే.టి.ర్ చేయబట్టే అయ్యింది. ఎందుకంటే ఎన్-కన్వెన్షన్ హాల్ ను కూలగొట్టద్దు అంటే సమంతను నా దగ్గరికి పంపాలే అని చెప్పి ఆయన డిమాండ్ చేసాడు. సమంత గారిని వెళ్ళమని చెప్పి నాగార్జున వాళ్ళు ఫోర్స్ చేసారు. సమంత నేను వెళ్ళను అనింది. వెళ్ళను అంటే చెపితే వింటే విను లేకపోతే వెళ్ళిపో అని విడాకులు ఇచ్చారు.”

Translation:

“Naga Chaitanya's divorce is 100% due to KCR --- KTR. The reason is that, he [KTR] demanded that Samantha be sent to him, for not to demolish the N-convention hall. Nagarjuna and his family pressured Samantha to go. Samantha said she would not go. When she said she would not go, they told her to listen to them or asked her leave, which led to the divorce”



9. It is respectfully submitted that the complainant was shocked to see clips of the defamatory statement being widely published and circulated on various social media platforms, including YouTube, Facebook, Twitter, and WhatsApp. The statement falsely claims and misleads the public into believing that the cause of the divorce between Naga Chaitanya (the complainant's son) and his ex-wife, Ms. Samantha, was linked to a purported illicit demand made by Shri K.T. Rama Rao (KTR). Specifically, the accused has insinuated, in a derogatory manner, that Shri K.T. Rama Rao requested a meeting with Ms. Samantha for inappropriate purposes, and further implied that the complainant supported these alleged interests of Shri K.T. Rama Rao in exchange for not demolishing the N-Convention Centre, owned by the complainant's family. It is alleged that the complainant and his family pressured Ms. Samantha to comply, which ultimately led to the divorce.

10. It is respectfully submitted that the aforementioned statement has been extensively reported by various news channels and newspapers on their websites and YouTube channels. The links to some of these reports/videos are provided below:

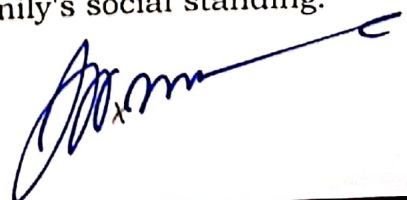
- 'KTR reason for Samantha, Chaitanya's divorce: Telangana Minister Konda Surekha,' reported by Siasat Daily, available at: <https://www.siasat.com/ktr-reason-for-samantha-chaitanyas-divorce-telangana-min-konda-surekha-3106331/>
- 'Huge Row Over Telangana Minister Linking Naga-Samantha Divorce to KTR,' reported by NDTV, available at: <https://www.ndtv.com/india-news/huge-row-over-telangana-minister-linking-naga-samantha-divorce-to-ktr-6700773>
- 'Minister Konda Surekha sensational comments about KTR and Samantha | Nagarjuna | N18S,' video published by News18 Telugu on YouTube, available at: <https://youtube.com/shorts/X-0efqjytfA?si=V5dvOPd6WF2phHWF>



- 'Minister Konda Surekha Sensational Comments on KTR | Samantha | Nagarjuna,' video published by TV5 News on YouTube, available at: <https://www.youtube.com/watch?v=C4qKOuDe9Uc>

It is respectfully submitted that the above list is only illustrative and not exhaustive.

11. It is respectfully submitted that all the allegations made by the accused in the defamatory statement are entirely incorrect, baseless, and false. The defamatory claims were made without any veracity or truth. The accused deliberately spread these allegations with the sole intention of damaging the complainant's personal, professional and his family reputation, fully aware of their falsity.
12. It is respectfully submitted that immediately after the defamatory statement was made by the accused, the complainant received numerous phone calls from family members, friends, colleagues, and others, who were concerned and sought clarification. The statement was made with the malicious intent of conveying falsehoods to the public at large, intending to cause harm to the complainant and his family reputation for political gain and sensationalism.
13. It is respectfully submitted that the main purpose of spreading such false, libelous, and defamatory content by the accused was to tarnish the complainant and his family image and reputation. This act was carried out without any verification, highlighting the malicious intent of the accused to harm the complainant's stature in society and to cause sensationalism.
14. It is respectfully submitted that by making and spreading these defamatory remarks, the accused, has significantly damaged the complainant's reputation. This has led to a flurry of queries from friends, relatives, and colleagues who expressed shock and concern over the false allegations. The defamatory content has led to widespread gossip, negatively affecting the complainant and his family's social standing.



15. It is submitted that owing to the large number of people enquiring the complainant about the same, the complainant was compelled to make a public statement on his 'X' (formerly Twitter) profile, condemning the comments made by the accused and requesting her to withdraw the same immediately.
16. It is respectfully submitted that among the many people who inquired, two individuals, Ms. Yarlagadda Supriya and Mr. Venkateshwar Metla, contacted the complainant on 03.10.2024, expressing their distress over the defamatory news. The complainant was forced to explain the falsity of the accusations in great detail, following which their apprehensions and anxieties were dispelled. The baseless claims have caused a severe negative impact on the complainant's mental well-being and social standing.
17. It is respectfully submitted that the complainant, who is widely respected in society, has suffered disrepute and emotional distress due to the false and defamatory statements spread by the accused. Such false allegations constitute an act of criminal defamation, causing harm to both personal and professional aspects of the complainant's life and his entire family.
18. The above actions of the accused constitute a criminal offence in the law and the accused are liable to be punished under section 356 of B.N.S.

LIMITATION:

The complaint is well within the limitation as the statement was made by the accused on 02.10.2024 against the complainant and the enquiries regarding such statement were made on 03.10.2024.

JURISDICTION:

The complainant was apprised and had come to know of the said defamatory statement made by the accused on 02.10.2024 through social media and through various individuals. The accused made the statement at



Bapu Ghat, Langar Houz which falls within the jurisdiction of P.S. Langar

Houz and hence, is within the jurisdiction of this Hon'ble Court. The accused

present case is an elected M.L.A for the state of Telangana and also in serving as a cabinet minister. Hence, this Hon'ble court has jurisdiction to entertain the present complaint

PRAYER: cabinet minister. Hence, this Hon'ble court has jurisdiction to entertain the present complaint

Therefore, it is humbly prayed that this Hon'ble Court may be pleased to take cognizance of the case for offences punishable under Section 356 of B.N.S. and punish the accused as per Law in the interest of justice and in the circumstances of the case.

Place: Hyderabad

Dated: 03.10.2024



COMPLAINANT

COUNSEL FOR THE COMPLAINANT

LIST OF DOCUMENTS

Sl No	Date of Document	Description of Document	Remarks
1.	02.10.2024	Copy of the transcript of the statement made by the accused on 02.10.2024 along with translation in English	Photocopy
2.	02.10.2024	Copy of the video of the statement made by the accused on 02.10.2024 in Pen Drive	Pen Drive
3.	02.10.2024	Copy of the Article titled "KTR reason for Samantha, Chaitanya's divorce: Telangana min Konda Surekha", Reported by Siasat Daily Newspaper, available at: https://www.siasat.com/ktr-reason-for-samantha-chaitanyas-divorce-telangana-min-konda-surekha-3106331/	Photocopy
4.	02.10.2024	Copy of the Article titled "Huge Row Over Telangana Minister Linking Naga-Samantha Divorce to KTR", Reported by NDTV Newspaper, available at: https://www.ndtv.com/india-news/huge-row-over-telangana-minister-linking-naga-samantha-divorce-to-ktr-6700773	Photocopy
5.	02.10.2024	Copy of the screenshot of the video titled "Minister Konda Surekha sensational Comments about KTR and Samantha Nagarjuna N18S", Video published by News18Telugu on YouTube, available at: https://youtube.com/shorts/X-0efqjytfA?si=V5dvOPd6WF2phHWF	Photocopy
6.	02.10.2024	Copy of the screenshot of the video titled "Minister Konda Surekha Sensational Comments on KTR Samantha Nagarjuna TV5 News", video published by TV5 News on YouTube, available at: https://www.youtube.com/watch?v=C4qKOuDe9Uc	
7.	02.10.2024	Copy of the screenshot Statement made by Shri Nagarjuna Akkineni on his 'X' Profile at: https://twitter.com/iamnagarjuna/status/1841446247242035233	Photocopy
8.		Aadhar Card of Shri Nagarjuna Akkineni (Complainant)	Photocopy
9.		Aadhar Card of Ms. Yarlagadda Supriya (Witness No.1)	Photocopy
10.		Aadhar Card of Mr. Venkateshwar Metla (Witness No.2)	Photocopy


COMPLAINANT