

LEGAL NOTICE

‘WITHOUT PREJUDICE’

Date: 02.04.2024

To,

Smt Konda Surekha Garu

Hon’ble Minister for Forest and Environment, and Endowments,
Member of Telangana State Legislative Assembly from Warangal East,
Telangana State.

R/o Flat No.100, MLA, MP’s Colony, Road No. 10C,
Jubilee Hills, Vijaya Housing Co-operative Society,
Hyderabad, Telangana State – 500033
Email ID: kondasurekha1965@gmail.com

Also at:

H. No. 2-4-264, Ramnagar, Behind Old Bus Depot,
Hanamkonda, Warangal District,
Telangana State – 506001

Dear Ma’am,

Sub: Defamation notice for comments made by you against Sri Kalvakuntla Taraka Rama Rao, S/o Sri K Chandrashekar Rao, Member of Telangana State Legislative Assembly from Sircilla Constituency (“our client”).

On behalf of our client – Sri Kalvakuntla Taraka Rama Rao, S/o Sri K Chandrashekar Rao, Member of Telangana State Legislative Assembly from Sircilla Constituency, R/o H.No. 8-2-120/110/1/3, Nandinagar, Road No. 14, Banjara Hills, Hyderabad – 500034 (“our client”), and under the instructions of our client, we issue this legal notice as under:



1. Our client is an Indian politician and a Member of Telangana Legislative Assembly. He is a former Minister for Municipal Administration and Urban Development, Industries and Commerce, and Information Technology, Electronics and Communications of Telangana. He represents Sircilla assembly constituency in the Telangana Legislative Assembly, he is also the working president of the Bharat Rashtra Samithi.
2. Our client states that he is a law-abiding citizen of this country and a man of good repute. During his term as a Minister of Telangana State, he made immense contribution to the development of the State. He has led numerous delegations in partnering with multi-national corporations across the world inviting them to invest in the Telangana State. He has achieved various milestones as a Minister of Telangana State and has been a key contributor to the rapid development of the State.
3. Our client has an impeccable track record having earned tremendous goodwill, and is popularly known for his excellent leadership qualities across the Telangana State and India as well. He is also well known in various countries across the world for his tireless efforts towards bringing in foreign investments to Telangana State and for the overall progress and development of Telangana State.
4. Our client states that it has recently come to his attention that you are defaming our client by making false, slanderous and libelous statements, implying that our client is involved in an alleged “phone tapping” issue to which he is neither a part of nor aware of. Our client states that allegations made by you are misplaced without proofs and reeks of your *mala fide* intention to tarnish the reputation, image and goodwill of our client.
5. Our client states that the daily newspaper Deccan Chronicle on 02.04.2024, reported a comment made by you alleging that our client is involved in phone tapping and the



same is misplaced and without any proof whatsoever. Following is the excerpt from the said newspaper article:

“BRS working president K.T. Rama Rao had indulged in phone tapping and threatened film actresses, minister Konda Surekha alleged on Monday, adding to reports piling up against the BRS leadership in the mass phone-tapping operations prior to the Assembly elections. [...] She said Rama Rao and his father, former chief minister K. Chandrashekar Rao, would very soon be arrested for the scam, in the way his sister Kavitha who was sent to jail in the liquor scam.”

6. The said news is also being circulated by various media houses on internet and circulating the said press meet videos, some which are available as follows:
 - a. <https://www.youtube.com/watch?v=ju6f06z73bY>
 - b. <https://www.youtube.com/watch?v=7c067bs-4gU>
 - c. <https://www.greatandhra.com/politics/tehangana-news/ktr-threatened-film-actresses-through-phone-tapping-136845>
7. Our client states that being an Hon'ble and responsible Minister of Telangana State, it is appalling that such statements are being made by you against a fellow Member of the Legislative Assembly without any basis or proof whatsoever. The general public is bound to believe such statements when they are being made by you in the capacity of a Minister of State of Telangana, which will impact our client's goodwill and tarnish his reputation.
8. Our client further instructed us to strongly caution you that he shall not tolerate any such libelous and slanderous statements which are made only to tarnish the reputation of our client for your political and personal benefit and vendetta. By making such



defamatory and derogatory statements, our client states that you are leaving an impact on the larger public to believe in such false statements and bring disrepute to our client and his family. Your intentions are quite clear that these defamatory statements are made to further your political gains, at the cost of our client's reputation and goodwill.

9. Our client states that you are indulging in vendetta politics and misusing your power as a Minister of Telangana State to deceive general public that our client is involved in an offence that he is neither aware of nor related to. Our client intends to state in a categorical and clear manner that, he has no relation to the said news or offence, and various media houses are making false and baseless conclusions that he is guilty of such offence and subjecting him to trial by media. He vehemently denies being part of or related to the offence in any manner whatsoever. As such, with a malicious and perverse intent, you are furthering such false news that is being circulated by spiteful media houses to tarnish the reputation of our client and his family.
10. Our client states that you are indulging in malicious and vindictive ways and methods to damage our client's reputation that was built by genuine contribution to the State of Telangana. Our client further states that indulging in such acts and making such unsubstantiated comments are aberrant, uncharacteristic and unexpected of a Minister of State of Telangana, as they are bound to have a severe impact on the perception of general public towards our client and damage our client's reputation.
11. Our client states that there are various media houses and social media accounts who are linking our client to the issue of phone tapping, wherein it is alleged that certain police officials have indulged in illegal phone tapping of various people. While the investigation is under way, there have been several reports and news articles being circulated online and offline, falsely associating our client to the said case and implicating that he has orchestrated the alleged phone tapping, while he had no



knowledge of or any connection with, in whatsoever manner. When such statements are made by an Hon'ble Minister of Telangana State, you are providing ammunition to the fake news that is being circulated by such media houses, who are making farce and baseless allegations, with the sole and oblique motive to defame, belittle and malign the credibility, reputation and goodwill of our client. Our client states that as a responsible and Hon'ble Minister of Telangana State, you should refrain from making frail and unsubstantiated statements without any proofs or basis whatsoever.

12. Our client states that various Youtube channels and media houses are continuously running stories naming and framing our client in the said phone tapping issue without any proof whatsoever and concluding that he is guilty of phone tapping. Our client states that you are acting in a co-ordinated manner conspiring against our client with the sole motive and intent to assassinate the character of our client without holding any proofs whatsoever in this regard. These unfounded allegations and acts of sensationalism have brought disrepute to our client and his family.
13. Our client states that you, along with other interested parties, collectively initiated a smear campaign against our client with the malicious intent to mislead and misdirect the people at large to a great misconception, which is severely affecting him and his family members.
14. Our client states that your prime motive is to destroy the confidence and trust of lakhs of public in our client by damaging his reputation, through all kinds of publicity with vested political agenda, by levelling frivolous and false allegations against our client.
15. Our client states that as a consequence of this vitriolic campaign, our client has been subjected to scandalous attacks with the sole motive of injuring his reputation. You,




along with media houses, have conspired to malign our client's reputation based on false information, assumptions, lies and frivolous allegations.

16. Our client states by implicating our client in a case to which he has no relation to whatsoever, you, along with media houses, are insinuating our client to trial by media by misleading and deceiving the general public. This public campaign effects the views of the general public and is damaging our client's reputation.
17. Our client states that from the day these allegations were published and circulated, our client has been suffering considerable embarrassment and loss of reputation. Such defamatory contents and allegations have resulted in endless defamation and damage to his reputation. In the most perfidious manner, you have provided ammunition to the spiteful media houses who have created an untrue defamation campaign, with the sole motive to ensure that the foot prints of such campaign in the digital and print media in a sustained manner, so as to build a false propaganda against our client for political and other reasons and vendetta. You have distorted the facts and misleading public at large for your personal and political benefits.
18. Therefore, in these circumstances, you are hereby called upon to do the following:
 - i. To immediately withdraw your statements made against our client Sri Kalvakuntla Taraka Rama Rao while addressing media persons at Congress office in Warangal City on 01.04.2024.
 - ii. To tender an unconditional public apology to our client Sri Kalvakuntla Taraka Rama Rao for tarnishing his reputation by your malicious and defamatory acts.
 - iii. To refrain from engaging in any further malicious or frivolous defamatory acts, directly or indirectly, against Sri Kalvakuntla Taraka Rama Rao.



19. Should you fail comply with our client's demands as stated in paragraph 18 above within a period of 7 (seven) days from the date of receipt of this notice, our client will be constrained to initiate necessary and appropriate legal action against you, as required under both civil and criminal law, while reserving his right to seek appropriate damages.


Advocate

