Justice and Empowerment of Minorities
An initiative of the Jamiat Ulama-i-Hind

Monthly Analytical Brief
September 2026

What September 2026 Shows About Hate Against Minorities and the State's Response to It

131 DOCUMENTED INCIDENTS

10 CONFIRMED FIR · 7.6%

3 CONFIRMED ARREST OF AN ACCUSED PERSON · 2.3%

Source: JEM monitoring database, September 2026 (n = 131 documented incidents).

INCIDENT PERIOD	DATA AS AT	PUBLISHED	REFERENCE
2026-09-01 – 2026-09-30	2026-10-01	October 2026	JEM-MAB-2026-09

Based on incidents independently documented by the JEM monitoring team.

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Figures 1 to 5 and Tables 1 and 2 follow the numbering of the source document. The other charts, tables and diagrams in this edition are unnumbered.

BEFORE THE FINDINGS

A note on the data

This monthly brief covers 131 incidents that our monitoring team identified and documented in September 2026. It is a record of what we could confirm. It is not a count of every act of hate that took place in India that month.

Some incidents are never reported. Some surface without a source we can trace. Some reach us only after we have closed the month. The real number for September is almost certainly higher than 131, and it may be much higher. Everything in this brief describes the cases we were able to document. It shows where we could look. It does not mark where the harm ends.

Reading the figures. 131 is a floor, not a ceiling. Every percentage is worked out against these 131 incidents, not against a guess at the true total. Figures for the last week of September are provisional. We were still adding records on 1 October, and the usual gap between an incident and its entry in our record was five days.

Who this brief is about. Of the 131 incidents, 117 (89.3%) were against Muslims, 13 (9.9%) against Christians and 1 (0.8%) against Sikhs. We stand with every one of these communities. Where a finding applies to one community only, we say so.

Whom the 131 incidents targeted



The 13 incidents against Christians are concentrated in West Bengal (8) and Madhya Pradesh (3); see Section Six.

Source: JEM monitoring database, September 2026.

Which incidents we counted. We counted an incident in September if it took place between 1 and 30 September 2026. Eleven other records entered this month carry earlier dates (ten from August, one from May) and belong to those months.

What we mean by a confirmed FIR or arrest. A confirmed FIR is a record whose legal status reads “FIR registered” (10 incidents). A confirmed arrest means we have confirmed that a person accused of the offence was arrested (3 incidents). Detentions for questioning, voluntary surrenders, and FIRs and arrests aimed at the communities that were attacked are counted separately in Section Four. “No action reported”, which is the status of 100 incidents, means no action against the accused has come to our notice. Where the State and the district in a record did not match (two records), we went by the district.

SECTION ONE

01 From 131 incidents to three arrests

In September 2026 we documented 131 incidents of hate and discrimination against Muslims and Christians in 20 States and Union territories, with four more online. A First Information Report was registered in 10 of them. In 3, a person accused of the offence was arrested. That gap is what this brief is about.

For most of these incidents, our record stops where the incident stops. In 100 of the 131 (76.3%) the status reads “No action reported”. There is no FIR and no arrest. There is nothing after the harm.

FIGURE 1 **From documented incident to confirmed arrest (September 2026, n = 131)**

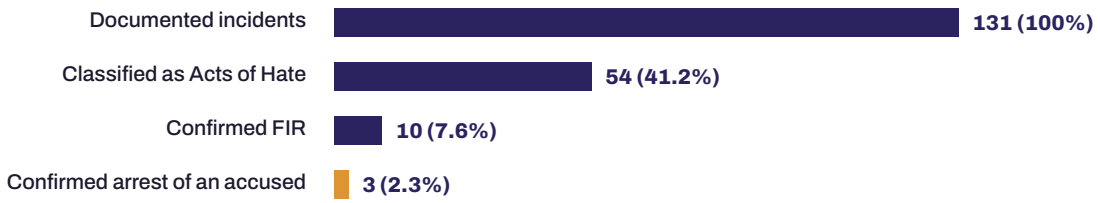


Figure 1. More than two in five of our 131 incidents were Acts of Hate. About 1 in 13 led to a confirmed FIR, and about 1 in 44 to a confirmed arrest. The other 128 incidents have no arrest on record.

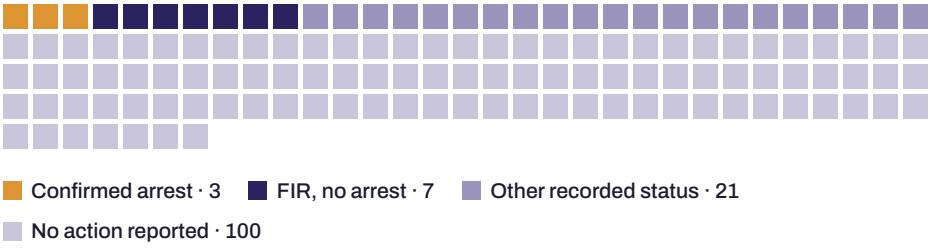
Source: JEM monitoring database, September 2026 (n = 131 documented incidents).

> *131 incidents documented. 54 Acts of Hate. 10 FIRs. 3 arrests. Not one of the 25 hate speeches made at public gatherings led to an FIR.*
>
> JUSTICE AND EMPOWERMENT OF MINORITIES

The ten FIRs cover a lynching in Tripura, a double murder in Bihar, the shooting of a schoolteacher in Bijnor, assaults in Lucknow, Kaushambi and Mandarmani, stone-pelting at a mosque and madrasa in Bhatkal, an armed raid on a Christian prayer meeting in Barrackpore, the bulk filing of voter-deletion forms in Godda and a social-media post about the Prophet in Ayodhya. Six of the ten are Acts of Violence. Only one is an Act of Hate, even though Acts of Hate are 54 of our 131 incidents. When the harm is a beating or a killing, the

system sometimes moves. When the harm is the speech that prepares the ground for it, the system almost never does.

One square per incident: what the record shows next



All three arrests are within the ten FIR cases. “Other recorded status” is the remainder after the FIRs and the “No action reported” records (131 − 10 − 100); the brief does not itemise it.

Source: JEM monitoring database, September 2026. Derived from counts stated in this brief.

Compared with August, the gap has grown. In August we documented 98 incidents. Ten had an FIR and five led to arrests. This month the FIR count is the same, 10, but we documented a third more incidents (33.7%). So the FIR share falls from 10.2% to 7.6%, and the arrest share from 5.1% to 2.3%. A bigger caseload does not mean hate rose by a third. It means we were able to document more of it.

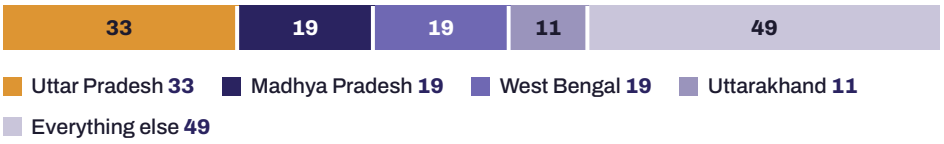
One caution on the FIR count. In four of the ten cases (Ayodhya, Barrackpore, Kaushambi and Bijnor) the reports speak of an assurance of action, a complaint, or a case “being registered”, and do not say outright that an FIR exists. We have kept them as reported.

SECTION TWO

02 A geography of concentration

Uttar Pradesh was again the most documented State, with 33 of the 131 cases (25.2%), though its share is far below August's 44.9%. Madhya Pradesh and West Bengal recorded 19 each, up from 5 and 7 in August. With Uttarakhand (11), these four jurisdictions account for 62.6% of everything we documented.

Four jurisdictions account for 62.6% of the record



82 of 131 incidents (62.6%) fall in the first four segments.

Source: JEM monitoring database, September 2026.

FIGURE 2 **State-wise distribution of documented incidents (n = 131, across 20 States and UTs plus online)**

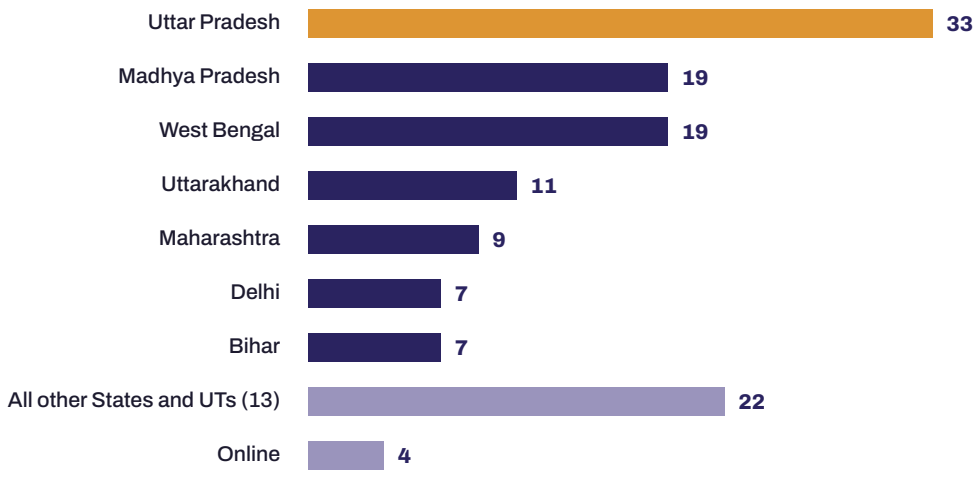


Figure 2. State-wise distribution of the 131 documented September incidents. The 13 other jurisdictions are Telangana, Jammu and Kashmir and Haryana (3 each), Karnataka, Odisha and Assam (2 each), and Rajasthan, Tripura, Jharkhand, Gujarat, Tamil Nadu, Punjab and Chhattisgarh (1 each). Four jurisdictions account for 62.6% of the 131.

Source: JEM monitoring database, September 2026.

The concentration shows below State level too. Ujjain is the most documented district, with 7 records (5.3%), six of them tied to a single road-widening project. Dehradun, Bhopal and North 24 Parganas have

5 each, and Ghaziabad, including Loni, has 4. Uttar Pradesh has also changed in character. In August its 44 cases looked like the national mix. In September, 17 of its 33 (51.5%) are Acts of Hate, against 41.2% across the country. The State's record is now more about speech than the rest of India's.

Two cautions apply to this map. A State's count shows where cases came to light and where we could verify them. It is not a ranking of where hate runs deepest, and the jump in Madhya Pradesh and West Bengal may partly reflect where our team was able to work. Even so, both States stand out for one kind of case. Eight of West Bengal's 19 records and 3 of Madhya Pradesh's concern Christian worshippers (Section Six).

The duty to protect people is written into the Constitution. Article 355 requires the Union to protect every State against internal disturbance. The State's duty to prevent mob violence before it happens comes from the Supreme Court's reading of Article 21 in *Tehseen S. Poonawalla v. Union of India* (2018) 9 SCC 501. The Court held that preventing foreseeable mob violence, and not merely recording it afterwards, is an obligation of the State, and it issued binding directions to that end.

SECTION THREE

03 Seven categories, one underlying pattern

We sort every incident into one of seven categories. Acts of Hate, which covers speech, slogans, threats and calls for violence, is the largest at 54 cases (41.2%). Acts of Violence follows with 23 (17.6%). Together they make up 58.8% of the month. Add Attacks on Religious Spaces (21 cases, 16.0%) and these three categories of direct hostility account for nearly three-quarters of what we recorded (74.8%).

FIGURE 3 **Distribution of documented incidents by category (n = 131)**

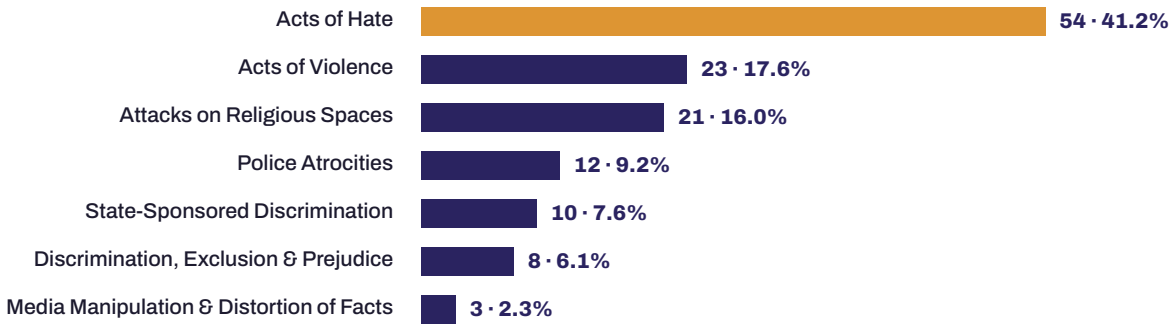


Figure 3. Distribution of the 131 documented incidents by category. The seventh category had no cases in our August report and has three in September.

Source: JEM monitoring database, September 2026. Categories follow the JEM incident taxonomy.

Hate speech as an early warning

Thirty-seven of the 54 Acts of Hate are speech: 25 hate speeches at public gatherings, 4 online, 4 calls to violence, 3 cases of communal sloganeering and 1 call for an economic boycott. Speech that sets one religious group against another falls under Section 196 of the Bharatiya Nyaya Sanhita, 2023. This section replaced Section 153A of the old Indian Penal Code on 1 July 2024 and now covers incitement through electronic communication. Speech that threatens a person falls under Section 351 BNS, on criminal intimidation. Where speech calls for a community to be killed or to lose its standing as citizens, Section 197(1)(c) BNS applies, along with Section 353(2) BNS on statements meant to create enmity or ill-will. On the limits of free speech, the governing authority is *Amish Devgan v. Union of India* (2021) 1 SCC 1. It holds that Article 19(1)(a) does not protect speech that is deliberately aimed at outraging religious feelings or at denying a group its equal standing as citizens.

The police do not need to wait for a complaint. On 21 October 2022, in *Shaheen Abdulla v. Union of India* (W.P.(C) 940/2022), the Supreme Court directed the Governments of Delhi, Uttar Pradesh and Uttarakhand to register cases on their own whenever such speech occurs, whatever the speaker's religion. On 28 April 2023 it extended the direction to every State and Union Territory and warned that delay would be treated as contempt. Our September record shows how far that direction has travelled. Of the 37 speech incidents, a confirmed FIR exists in one, a complaint without an FIR in two, and no action at all in 34. Not one of the 25 hate speeches at public gatherings produced an FIR.

Of 37 speech incidents, one produced an FIR



Confirmed FIR **1** Complaint, no FIR **2** No action at all **34**

0 of the 25 hate speeches made at public gatherings led to an FIR.

Source: JEM monitoring database, September 2026.

We also know who is speaking. Ten incidents involve sitting legislators, a Minister or a Chief Minister: Maharashtra Minister Nitesh Rane (3 incidents), Bhopal MLA Rameshwar Sharma (3), Uttarakhand Chief Minister Pushkar Singh Dhami (2), Loni MLA Nandkishore Gurjar (1) and Ahilyanagar MLA Sangram Jagtap (1). No FIR is recorded in any of the ten, and only one has a complaint. People outside office repeat the pattern. Pinki Chaudhary, national president of the Hindu Raksha Dal, appears in two speech incidents and a third in Meerut, where his group acted on his directive. The monk Madhuram Sharan Shiva appears twice, in Kanpur and Kanpur Dehat, urging Hindus to take up arms.

Speech also leads somewhere. In Loni, Ghaziabad, a mob of around 100 men gathered outside a women's skill centre on 9 September, calling it a madrasa, and came back on 10 and 12 September. On 13 September a mahapanchayat in the same town heard a legislator tell young men to cut throats over cow protection. On 14 September the administration demolished an under-construction house it said stood on cemetery land. Our record does not show that one event caused the next. It does show three incidents in six days in one locality, and not one FIR. When hate speech is treated as a minor offence to be dealt with later, its danger is missed. Read as a warning, it is one of the few signals the police and monitors get before an incident turns into a death.

Five events in six days, three of them mob visits

2026-09-09	**Gathering.** A mob of around 100 men outside a women's skill centre, calling it a madrasa.
2026-09-10	**Return.** The mob comes back.
2026-09-12	**Return.** The mob comes back again.
2026-09-13	**Mahapanchayat.** A legislator tells young men to cut throats over cow protection.
2026-09-14	**Demolition.** The administration demolishes an under-construction house it said stood on cemetery land.

Our record does not show that one event caused the next. FIRs recorded: none.

Source: JEM monitoring database, September 2026.

Violence, and the law written for it

Acts of Violence include mob assaults (9 incidents), individual assaults (5), murders (3), a lynching, attacks linked to cattle and to interfaith couples, and coercion over what people are made to say. Five people were killed in four incidents. They were Jalilur Rahman in Khowai, Tripura; Marina Khatoon and Jameel Akhtar in Motihari, Bihar; Naushad Ahmad in Bijnor, Uttar Pradesh; and five-year-old Sufiyan in Begusarai, Bihar. In Sufiyan's case no motive has been established and the family reports no known enmity. We include it because a Muslim child was killed and the circumstances demand a proper investigation. In four incidents Muslims were forced or pressed to chant "Jai Shri Ram" or "Bharat Mata Ki Jai", in Bhopal, on a train near Kalyan, in Lucknow and on the Shiv Khori pilgrimage route in Jammu and Kashmir. Six of the 23 incidents (26.1%) have a confirmed FIR, the highest rate in any category.

In its most serious form, a group killing is governed by Section 103(2) BNS. The old Penal Code had no such provision. It covers murder by five or more people on grounds of the victim's race, caste, community, sex, place of birth, language or personal belief, and it prescribes death or life imprisonment for every member of the group. Whether investigators use Section 103(2) or fall back on the ordinary murder provision in Section 103(1) is something anyone can check, and it tells us whether the law is being applied as it was written.

Religious spaces, discrimination, and the cases where the State is the actor

Of the 21 Attacks on Religious Spaces, 7 are demolitions of mosques or a cemetery by public authorities and 2 concern the sealing or non-recognition of madrasas. Six concern Christian worship, 2 are the

demolition or damage of a mazar in Karnal, and 4 are threats or attempted entry at mosques in Haridwar, Bijnor and Meerut and stone-pelting at a mosque and madrasa in Bhatkal. These cases engage Sections 298, 299 and 300 BNS, the guarantees of religious freedom in Articles 25 and 26 and, for madrasas, Article 30(1).

Five people killed in four incidents

INCIDENT	KILLED	STATUS
Khowai, Tripura (2026-09-02)	Jalilur Rahman	FIR; no arrests confirmed
Motihari, Bihar (2026-09-10)	Marina Khatoon, Jameel Akhtar	3 arrested the same night
Bijnor, Uttar Pradesh (2026-09-15)	Naushad Ahmad	Accused surrendered; FIR
Begusarai, Bihar	Sufiyan, aged five	No motive established; family reports no known enmity

Source: JEM monitoring database, September 2026.

Discrimination, Exclusion and Prejudice (8 cases, 6.1%) includes the boycott of 40 Muslim families in Hapas, Sikar, and of a family in Mukharai, Mathura. It includes a campaign in Bolpur demanding that Muslim-owned food businesses display their owners' religion, the forced resignation of a Muslim college vice-principal in Kolkata, and objections to the burqa and niqab in hospitals in Indore and Doda. These engage Article 15, which bars discrimination on grounds of religion, and Article 19(1)(g), the right to earn a living through trade.

State-Sponsored Discrimination (10 cases) and Police Atrocities (12) are fewer in number, but they are different in kind, because the accused is the State itself. Across the whole record, 29 incidents (22.1%) name a State actor: the police in 10, district administrations in 8, State governments in 7 and municipal or development authorities in 4. Action against Muslim individuals, businesses and institutions engages Article 14 on equality and Article 21 on livelihood, which the Court recognised as part of the right to life in *Olga Tellis v. Bombay Municipal Corporation* (1985) 3 SCC 545.

29 incidents (22.1%) name a State actor



Source: JEM monitoring database, September 2026.

This month we saw a new cluster of seven records about identity and citizenship checks. They are “Operation Mukta” in Bengaluru; the voter-roll revision in Hyderabad, where 19.4 lakh names were reportedly marked for deletion, 40.7% of them Muslim names according to the report our record relies on; the Form 7 filings in Godda; 23 Bengali-speaking Muslim men detained in Bilaspur; midnight pickups of nine men and two children in West Bengal; a 66-year-old man held for nearly three months in Uttar Dinajpur; and the eviction of Rohingya families in Jammu. Article 21 protects people who are not citizens as well as those who are (*National Human Rights Commission v. State of Arunachal Pradesh* (1996) 1 SCC 742). The safeguards on arrest and detention in *D.K. Basu v. State of West Bengal* (1997) 1 SCC 416 apply to everyone, whatever the police suspect about their status.

Police inaction is also a legal wrong. In *Lalita Kumari v. Government of Uttar Pradesh* (2014) 2 SCC 1, a Constitution Bench held that registering an FIR on a complaint of a cognizable offence is not optional. Section 173 of the Bharatiya Nagarik Suraksha Sanhita, 2023 carries that duty forward. Section 173(3) allows a short preliminary inquiry of up to 14 days, with a senior officer’s permission, for offences punishable with three years or more but less than seven. It does not allow the police to refuse to register. A documented failure to register an FIR is a breach of a binding duty.

A seventh category: media and the distortion of facts

Three cases fall here. One is the AI-edited photographs of Muslim women circulated in Muzaffarnagar. Another is the use of religious identity and dress as viral content. The third is the order of the News Broadcasting and Digital Standards Authority of 11 September 2026, which fined Zee News ₹2 lakh and directed it to remove coverage of an Aligarh Muslim University protest, finding that the channel had misrepresented the protest by leaving out its context. That order is the only formal sanction in our entire September record. Manipulated images of women engage Section 79 BNS and, depending on what was done to them, the Information Technology Act, 2000.

The month’s only formal sanction

₹2 lakh

fine imposed on Zee News by the NBDSA, 2026-09-11, with removal of coverage of an Aligarh Muslim University protest

1

formal sanction in our entire September record

Source: JEM monitoring database, September 2026.

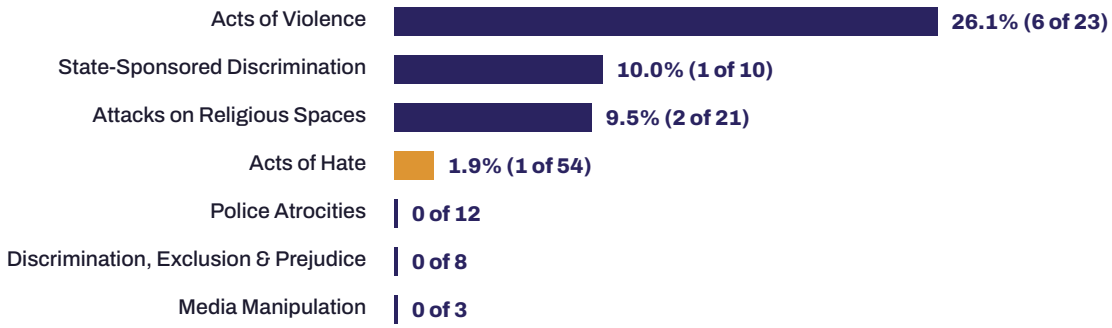
SECTION FOUR

04 The accountability gap, in our own record

Of the 131 incidents we documented, a confirmed FIR was registered in 10 (7.6%). A person accused of the offence was arrested in 3 (2.3%).

The FIR rate depends heavily on the kind of harm. Acts of Violence have the highest rate, 6 of 23 (26.1%). Attacks on Religious Spaces have 2 of 21 (9.5%) and State-Sponsored Discrimination 1 of 10. Acts of Hate have 1 of 54 (1.9%). Police Atrocities (12), Discrimination, Exclusion and Prejudice (8) and Media Manipulation (3) have none. By State, Uttar Pradesh has 4 FIRs in 33 incidents (12.1%) and West Bengal 2 in 19, with one each in Tripura, Jharkhand, Bihar and Karnataka. Madhya Pradesh (19 incidents), Uttarakhand (11), Maharashtra (9) and Delhi (7) have none.

The FIR rate depends on the kind of harm



Scale 0–30%. Acts of Hate are the largest category and have the lowest rate of any category that has an FIR.

Source: JEM monitoring database, September 2026.

Two other outcomes sit outside the table. In Bijnor, the man accused of shooting school teacher Naushad Ahmad surrendered at a police station. In Khoda, Ghaziabad, two youths were detained for questioning after a video showed a young man being beaten over a “love jihad” allegation. Our status field says “Arrest(s) made” for that case, but the report behind it describes a detention only, and we have no confirmed FIR or charge.

TABLE 1 Confirmed arrests of accused persons in the September record

CASE	ACTION RECORDED
Assault on a Muslim family by resort staff, Mandarmani, Purba Medinipur, West Bengal (5 September)	2 arrested (the resort manager and a security guard); produced before a court on 6 September
Killing of Marina Khatoon and Jameel Akhtar, Motihari, East Champaran, Bihar (10 September)	3 arrested the same night
Bulk filing of about 200 Form 7 applications against Muslim voters, Godda, Jharkhand (3 September)	1 arrested, a BJP booth-level agent; released on bail within hours

Table 1. Confirmed arrests of accused persons in the September record. Three incidents, six people.

Source: JEM monitoring database, September 2026.

Beyond arrests, our record shows an FIR but no arrest in the Khowai lynching, the Lucknow assault and the Bhatkal stone-pelting. In Kaushambi a case was "being registered" after the victim said police had initially done nothing. A Mumbai hospital received a show-cause notice after two women were turned away from a maternity ward for wearing burqas. A government medical college in Doda set up an inquiry committee. In Meerut, police stopped a Hindu Raksha Dal group from reaching a mosque. In Bijnor, a District Magistrate began an inquiry into a claim about a mosque. Outside the police and district administration, the National Commission for Minorities asked West Bengal for a report around 24 September, and the NBDSA fined a television channel. These are small steps, and we acknowledge them. They are not enough to answer the scale of what we recorded.

Where the State moved, it often moved against the people who were attacked

The percentages hide something we think matters more than any of them. In at least nine records, the action described in the report is an FIR or an arrest aimed at the affected communities, or at the people who reported on the incident. Eight of the nine are entered as "No action reported" and one is blank, because that field tracks action against the accused.

> **Moradabad (3 September):** an FIR under Sections 285 and 292 BNS against a Samajwadi Party district vice-president for offering namaz near his vehicle at a Circuit House, on a complaint that it obstructed visitors.

> **Shamli (16 September):** an FIR under Section 353(2) BNS against six people, among them Muslim journalists and a lawyer, over social-media posts about the Allahabad High Court's handling of the Ayush Malik case. This is the same provision that has not been used against any of the 25 public hate speeches.

West Bengal (19 September): an FIR by Bidhannagar cyber crime police over a news outlet's report of an MP's allegation that senior Muslim officers were kept away from the Union Home Minister's events. The FIR invokes provisions on enmity, outraging religious feelings, public mischief and defamation, and account data was sought from X.

Betul and Rewa, Madhya Pradesh (27 September): after Hindu groups raided Christian prayer meetings, an FIR against the organisers in Betul under the Madhya Pradesh Religious Freedom Act, and an FIR against two individuals in Rewa.

Sidhi, Madhya Pradesh (20 September): three people arrested for allegedly facilitating conversions at a prayer meeting that Bajrang Dal members and the police raided together.

Tirunelveli, Tamil Nadu (15 September): a biryani shop owner arrested over a banner showing Ganesha preparing biryani, after a complaint.

Ujjain, Madhya Pradesh (17 and 28 September): a Muslim youth reportedly arrested as a "suspect" during the mosque road-widening dispute, and 15 people arrested after the 28 September protest, with seven cases registered. The report we rely on does not say that all of those arrested were Muslim.

Put these nine records next to 10 FIRs for hate and violence and 3 incidents with arrests of the accused, and a pattern appears that the totals alone would hide. Five more records involve detention on suspicion of being a foreign national or of an offence. Three Muslim residents were taken into custody in Saidabad, Hyderabad, after chicken waste was found outside a Ganesh pandal. The rest are the identity-verification detentions in Bengaluru, Bilaspur and West Bengal described in Section Three.

The record has no counterweight on the other side. Ten incidents name the police as the accused. They include two Muslim women journalists allegedly detained and assaulted in Saket, Delhi, and an e-rickshaw driver allegedly beaten and refused registration of his complaint in North West Delhi. We have recorded no FIR, suspension or departmental action against any police officer in any of the ten. In August, the Chatra lynching was the one case where the State looked at its own conduct, with four personnel suspended. September has nothing like it.

FIRs and arrests: against the accused, and against those attacked or reporting



Source: JEM monitoring database, September 2026.

Where State conduct was examined, it was by courts and regulators. The Gauhati High Court observed that the Goalpara demolition appeared, prima facie, "illegal and unauthorised". A magistrate's court in Uttar Dinajpur granted bail to a 66-year-old man held for nearly three months and found his documents valid. A habeas corpus petition is before the Calcutta High Court. Courts have not always protected the affected communities. On 9 September the Madhya Pradesh High Court dismissed petitions against the Ujjain road widening, finding that the authorities had followed procedure. We respect that order, and in Section Six we set out what it leaves unanswered.

All of this sits against a long judicial history. In *Tehseen S. Poonawalla v. Union of India* (2018) 9 SCC 501, a bench of Chief Justice Dipak Misra and Justices A.M. Khanwilkar and D.Y. Chandrachud directed every State to appoint a nodal officer of at least Superintendent of Police rank in each district to prevent vigilante violence, to register FIRs promptly on information about lynching, and to ensure fast-tracked trials. These directions bind all State authorities under Article 141. In July 2023 the Court ordered States to file year-wise data since 2018 on complaints received, FIRs registered and chargesheets filed. On 11 February 2025, in the National Federation of Indian Women petition, a bench of Justices B.R. Gavai and K. Vinod Chandran disposed of the litigation. It said again that the *Poonawalla* directions remain binding under Article 141, declined to lay down a uniform compensation scheme, and held that it could not monitor compliance in every State and Union Territory from Delhi. It left aggrieved persons to approach the High Courts. Against that history, September's 7.6% FIR rate and 2.3% arrest rate measure how far a binding order is being followed, now that the Supreme Court has stepped back from watching over it.

From a binding order to a stepped-back Court

2018	**Tehseen Poonawalla.** Every State to appoint a nodal officer of Superintendent of Police rank in each district, register FIRs promptly, and fast-track trials. Binding under Article 141.
2023-07	**Data order.** States to file year-wise data since 2018 on complaints, FIRs and chargesheets.
2025-02-11	**NFIW petition disposed of.** Poonawalla directions remain binding; no uniform compensation scheme; the Court cannot monitor every State from Delhi; aggrieved persons to approach the High Courts.
2026-09	**This brief.** A 7.6% FIR rate and a 2.3% arrest rate measure how far a binding order is followed now that the Court has stepped back.

Source: Tehseen S. Poonawalla v. Union of India (2018) 9 SCC 501; order of 2025-02-11.

SECTION FIVE

05 Reading September against the wider evidence

One month of data can only say so much. It means more when we set it beside August, beside what scholars have written about communal violence in India, and beside what independent monitors have recorded where official data is missing.

September against August

Eight measures, two months

MEASURE	AUGUST 2026	SEPTEMBER 2026
Documented incidents	**98**	**131**
States and UTs (plus online)	**17**	**20 (plus 4 online)**
Acts of Hate	**37 (37.8%)**	**54 (41.2%)**
Confirmed FIRs	**10 (10.2%)**	**10 (7.6%)**
Incidents with a confirmed arrest	**5 (5.1%)**	**3 (2.3%)**
Uttar Pradesh share	**44.9%**	**25.2%**
Incidents linked to a named organisation or party	**26 (26.5%)**	**45 (34.4%)**
Incidents with mainstream media coverage recorded	**19 (19.4%)**	**33 (25.2%)**

August's figures are those in our August brief, which counted verified incidents. September's count includes 17 incidents still waiting for a second source. The comparison is a guide, not a time series.

Source: JEM August and September briefs.

How repeated provocation is organised

The political scientist Paul Brass spent much of his career studying recurring Hindu-Muslim violence in the north Indian city of Aligarh. He concluded that where communal violence keeps coming back to the same place, it is rarely spontaneous. He described an institutionalised riot system with three phases. First comes a long period of preparation, in which people he called "fire tenders" keep tension alive through small provocations. Then a trigger is used to

bring a crowd together. Afterwards, responsibility is deliberately blurred so that no organiser has to answer for it.

Three phases, and where September's record fits

1	2	3
Preparation	**Trigger**	**Blurring**
A long period in which "fire tenders" keep tension alive through small provocations.	An event is used to bring a crowd together.	Responsibility is deliberately blurred so that no organiser answers for it.

In September's record. Preparation: between 21 and 29 September, groups announced or attempted to enter mosques and a mazar to recite the Hanuman Chalisa in three districts; six VHP foundation-day events produced six hate-speech records across four States. Blurring: in Karnal one account blames VHP and Bajrang Dal members for the mazar attack and another an unnamed Hindu nationalist group.

Source: Paul R. Brass, The Production of Hindu-Muslim Violence in Contemporary India (2003); JEM monitoring database.

September's record fits the preparation phase closely. Between 21 and 29 September, groups announced or attempted to enter mosques and a mazar to recite the Hanuman Chalisa in three districts. In Bijnor, Hindu Raksha Dal leaders warned they would dig up a mosque themselves if the administration did not. In Karnal, a mazar was hammered and the hymn recited. In Meerut, police stopped a Hindu Raksha Dal group. In the same month, six events marking the Vishwa Hindu Parishad's foundation day, in Barrackpore, Kasganj, Borivali, Dehri, Lalitpur and Mau, produced six separate records of hate speech across four States. The blurring of responsibility shows up in miniature in Karnal, where one account blames VHP and Bajrang Dal members for the attack on the mazar and another blames an unnamed Hindu nationalist group.

Ashutosh Varshney, writing around the same time as Brass, argued that towns with strong everyday ties between Hindus and Muslims, through business associations, trade unions and neighbourhood groups, recover faster from provocation and see less violence. September's boycotts go straight at those ties. They include 40 families in Hapas, Sikar; a campaign in Bolpur to make Muslim-owned food businesses display their owners' religion; a family in Mukharai, Mathura; and warnings to Muslim shopkeepers in Gurdaspur.

The researcher Susan Benesch has studied dangerous speech and asks five questions of any speech act. How influential is the speaker? How receptive is the audience? What does the content say? What is the

social and historical context? What medium carries it? By that test, most of September's speech incidents sit at the dangerous end. The speakers include Ministers, legislators and a Chief Minister. The audiences were gathered at religious festivals and organisational anniversaries. The content called for weapons, boycott or violence. And the context was one in which a "love jihad" claim was followed by violence or public humiliation in at least four cases this month.

Testing September's speech for danger

QUESTION	WHAT SEPTEMBER'S RECORD SHOWS
Who is the speaker, and how influential?	Ministers, legislators and a Chief Minister
How receptive is the audience?	Gathered at religious festivals and organisational anniversaries
What does the content say?	It called for weapons, boycott or violence
What is the social and historical context?	A "love jihad" claim was followed by violence or public humiliation in at least four cases this month
What medium carries it?	Public gatherings (25 incidents) and online (4); see Section Three

By this test, most of September's speech incidents sit at the dangerous end.

Source: Susan Benesch, Dangerous Speech: A Practical Guide (2021); JEM monitoring database.

What happens when official data goes missing

We say 131 is a floor because India's own official statistics have a documented gap, which we described in our August brief. The National Crime Records Bureau added sub-heads for mob lynching, hate crime and cow-related violence after the lynchings of 2015 and 2016. It collected the data and did not publish it. When *Crime in India 2017* appeared on 21 October 2019, those heads were missing. Independent trackers, including IndiaSpend and Human Rights Watch, filled the gap. We are doing the same. When the body responsible for a national count stops publishing one, the counting falls to whoever is willing to do it, with whatever resources they have. The 131 incidents in this brief are part of that work. We keep this record because no official one is kept.

SECTION SIX

06 Five cases, five mechanisms

Numbers show a pattern. They do not show how it works in a particular place, to a particular family. The five cases below show five different mechanisms at work in September: vigilante killing, demolition and the policing of protest, escalating speech by people in office, raids on private worship, and the "love jihad" accusation.

CASE ONE

Jalilur Rahman: a cattle trader lynched on an accusation of theft

Bagber, Khowai, Tripura, 2 September 2026

Jalilur Rahman (also reported as Jalil Rahman) was a 46-year-old Muslim cattle trader from Gilatali. At about 4:45 a.m. he was allegedly stopped by a mob in Bagber village, under Kalyanpur police station, as he was taking home two cattle he had bought from a local farmer. The mob reportedly called him a cattle thief and beat him to death. Police arrived and took him to a health facility, where doctors declared him brought dead. His family says the purchase was legitimate and is asking for accountability. The attackers are recorded as a mob with no confirmed organisational link.

Chatra (August) and Khowai (September)

RESPONSE	CHATRA · AUGUST	KHOWAI · SEPTEMBER
FIR	Naming 56 accused	Registered
Detentions	10	None recorded
Suspensions	4 personnel	None recorded

Source: JEM August and September briefs.

Police registered an FIR and began an investigation. No arrests were confirmed when we documented the case. In August, the Chatra lynching led to an FIR naming 56 accused, 10 detentions and four suspensions. Khowai has the FIR and, so far, nothing after it. If investigators find the mob acted on grounds of community, the killing falls under Section 103(2) BNS and not the ordinary murder provision, and we will be watching which section is applied. A man was killed for

carrying cattle he had paid for, on an accusation no court had examined.

KEY ISSUE

Vigilante justice, the presumption of innocence, and the State's duty under *Tehseen Poonawalla* to prevent lynching where cattle trade is the trigger.

CASE TWO

Ujjain: a road-widening project, two mosque demolitions and a protest met with tear gas

Ujjain, Madhya Pradesh, 1 to 28 September 2026

The Ujjain road-widening dispute became one of the month's most emotionally charged episodes for the Muslim community. On 1 September, Ujjain Municipal Corporation deployed JCBs to demolish portions of the nearly 150-year-old Madina Mosque, while parts of the Jamaat-e-Quraish Qasaban Mosque were also affected, citing road-widening works ahead of the 2028 Simhastha. Despite the administration's claim that legal notices had been issued, the demolitions triggered protests and deep distress among local residents. Visuals from the demolition reportedly showed Muslim youths crying as the mosque was being brought down, reflecting the anguish and helplessness felt by members of the community.

From the first demolition to the protest

2026-09-01	**Madina Mosque.** JCBs demolish portions of the nearly 150-year-old Madina Mosque; parts of the Jamaat-e-Quraish Qasaban Mosque also affected.
2026-09-09	**High Court.** Madhya Pradesh High Court dismisses petitions against removal of part of the Shahi Masjid for the 15-metre road.
2026-09-17	**An arrest.** A Muslim youth reportedly arrested as a "suspect" while opposition gathers.
2026-09-28	**Shahi Masjid.** A portion demolished amid heavy police deployment, bulldozers and riot-control vehicles; protesters met with lathi-charge and tear gas. The Times of India reported 15 arrests and seven cases.

Source: JEM monitoring database, September 2026.

The confrontation escalated later in the month. On 9 September, the Madhya Pradesh High Court dismissed petitions challenging the removal of part of the Shahi Masjid for the proposed 15-metre road. On 28 September, a portion of the Shahi Masjid was demolished amid heavy police deployment, bulldozers and riot-control vehicles,

creating an atmosphere of fear and chaos in the surrounding Muslim community. As protesters gathered, allegations of stone-pelting were recorded; police reportedly responded with lathi-charge, mild force and tear gas. The *Times of India* reported 15 arrests and seven cases. A Muslim youth had also reportedly been arrested as a "suspect" on 17 September while opposition to the demolition was gathering; allegations that he was singled out to portray the protest as unlawful remain to be independently verified.

This is the clearest case this month where a court backed the State's action. We respect the court's finding that procedure was followed. That finding settles the question of notice. It does not settle the questions we are asking. Why do places of worship carry so much of a public-works programme? Were other alignments considered? And why was a peaceful protest against the loss of a mosque met with tear gas and arrests? Article 19(1)(b) protects peaceful assembly, and places of worship are protected by Articles 25 and 26.

> **KEY ISSUE**
>
> Demolition of Muslim religious structures in the name of public infrastructure, the emotional and communal impact of the action, judicial approval of the administrative process, and the use of heavy police and riot-control measures during protests.

CASE THREE

Rameshwar Sharma: three statements in fifteen days

Bhopal, Madhya Pradesh, 6 to 21 September 2026

BJP MLA Rameshwar Sharma appears in three of our incidents. At a Matki Phod programme in Bhopal on 6 September he reportedly said that when "the one with the Sudarshan Chakra" came to earth the Mathura Eidgah would be demolished and a grand temple built, and he asked the crowd whether that should happen. At another Matki Phod programme, in Karond, he said a missile fired from Karond Square should land in Qazi Camp, a Muslim-majority locality of Bhopal. After the criticism he said he had meant a place of that name in Islamabad. On 21 September, speaking about Muslim men attending Garba events, he reportedly said, "Bring your sisters and daughters too, our boys are also ready." This was widely read as a rape threat against Muslim women.

Three statements, a climb from the symbolic to the sexual

1	2	3
Bhopal · 2026-09-06	**Karond · date not stated**	**Garba remarks · 2026-09-21**
Matki Phod programme: the Mathura Eidgah would be demolished and a grand temple built.	Matki Phod programme: a missile from Karond Square should land in Qazi Camp, a Muslim-majority locality.	On Garba: “Bring your sisters and daughters too, our boys are also ready.”

FIRs recorded for any of the three: none. A complaint was filed over the second. Provisions engaged: Sections 196, 299, 351 and 79 BNS.

Source: JEM monitoring database, September 2026.

The statements move from a call to demolish a mosque, to a missile aimed at a neighbourhood, to a sexual threat against a community’s women. A complaint was filed over the second statement. No FIR is recorded for any of the three. They engage Sections 196, 299 and 351 BNS and, for the last, Section 79 BNS on words meant to insult the modesty of a woman. They also fall squarely under the *Shaheen Abdulla* directions, which require the police to register cases on their own, without waiting for a complaint. Every MLA takes an oath under Article 188 to bear true faith and allegiance to the Constitution.

> **KEY ISSUE**
>
> Hate speech by a sitting legislator, a climb from the symbolic to the sexual, and a duty to act that was not carried out.

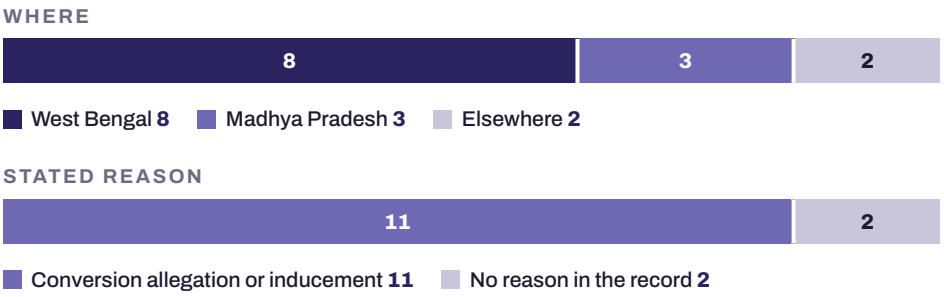
CASE FOUR

Private prayer, public raid: Barrackpore and the Christian meetings

Billa Depot, Barrackpore, North 24 Parganas, West Bengal, 19 September 2026

At about 2 p.m. a mob of 50 to 60 people, reportedly drunk and carrying iron bars and other weapons, stormed a private home in Billa Depot where eight believers were holding a prayer meeting. The attackers ransacked the house, looted household goods, tore up Bibles and destroyed hymn books. Three women, including Arpita Sardar, were beaten, insulted and dragged out before being taken to the police station. A crowd reported to be Bajrang Dal members then surrounded the police station, which delayed the women’s release. The survivors said they were refused copies of their complaint and medical reports. Our record lists the case as “FIR registered”, but the report behind it describes an official complaint and medical examinations.

13 incidents against Christians



The two with no stated reason are Billa Depot and Khejuri.

Source: JEM monitoring database, September 2026.

It is one of 13 incidents against Christians this month, 8 of them in West Bengal and 3 in Madhya Pradesh. Eleven of the 13 turn on an allegation of religious conversion or inducement. In the other two, Billa Depot and Khejuri, the record gives no reason. Prayer meetings were interrupted or raided in Belegachi, Mamudpur, Dharmatala in Kolkata, Kalna, Janakpuri in Delhi, Betul, Rewa and Sidhi. A guest house was raided in Tamluk. In Dehradun a Bajrang Dal leader stopped promoters of a Christian event and called them “Punjab ka Virus”. In Khejuri, more than 50 men reportedly entered a church during Sunday service and beat the pastor and a worshipper, and only a complaint was filed. Where the State did act, it acted against the worshippers (Section Four). Article 25 guarantees the freedom to profess, practise and propagate religion. Sections 298, 299 and 300 BNS protect places of worship and religious gatherings. The first offence in each of these cases is the disruption of a prayer meeting, whatever allegation follows.

> **KEY ISSUE**
>
> Conversion allegations used as an excuse to raid private worship, and a complaint turned against the worshippers.

CASE FIVE

“Love jihad”: an accusation that licenses violence

Bijnor, Ghaziabad, Ujjain and Ratlam, 1 to 28 September 2026

On 15 September, Naushad Ahmad, a government schoolteacher, was shot near the gate of Primary School Saupuri in Bijnor as he walked home after classes. He was taken to a private hospital and referred to AIIMS Rishikesh, where he died at about 5 p.m. The accused, 30-year-old Gaurav Rathi, surrendered at a police station. He reportedly said he had shot Naushad three times and accused him of involvement in

"love jihad". Police say the motive has not been established and are looking at that claim alongside a possible property or financial dispute.

Eight records; four are accusations against a person

2026-09-01 **Khoda, Ghaziabad.** A young man beaten with sticks.

2026-09-13 **Kharsod Khurd, Ujjain.** Two Muslim youths stopped, questioned about their religion and paraded in public.

2026-09-15 **Bijnor.** Naushad Ahmad, a government schoolteacher, shot dead.

2026-09-28 **Dhodar, Ratlam.** A Muslim man allegedly caught at a railway station with a Hindu woman and paraded by VHP-Bajrang Dal members and police personnel together.

In the other four records, the phrase is a talking point at a speech or protest, including one by a Chief Minister.

Source: JEM monitoring database, September 2026.

The phrase appears in eight of our records. In four it is an accusation against a person. A young man was beaten with sticks in Khoda, Ghaziabad (1 September). Two Muslim youths were stopped, questioned about their religion and paraded in public in Kharsod Khurd, Ujjain (13 September). Naushad Ahmad was killed in Bijnor. And in Dhodar, Ratlam (28 September), a Muslim man was allegedly caught at a railway station with a Hindu woman and paraded by VHP-Bajrang Dal members and police personnel together while slogans were chanted. In the other four, the phrase is a talking point at a speech or protest, including one by a Chief Minister. Allegations about interfaith relationships also lie behind the assault and forced apology of a Muslim youth in Sonapur, Kamrup, and the village boycotts in Sikar and Mathura. Adults have the right to choose their partner and their faith. The Supreme Court has said so in *Shafin Jahan v. Asokan K.M.* (2018) 16 SCC 368 and *Lata Singh v. State of U.P.* (2006) 5 SCC 475. In *Shakti Vahini v. Union of India* (2018) 7 SCC 192 it directed the police to protect couples from vigilante groups.

KEY ISSUE

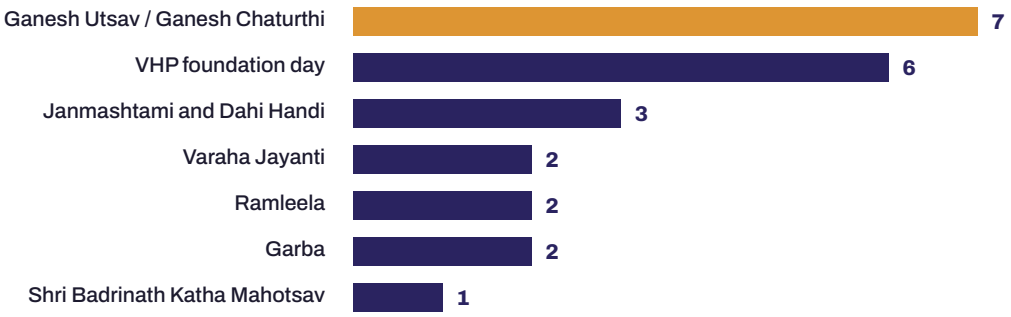
A conspiracy story that works as a licence to attack, and police taking part in a vigilante display.

SECTION SEVEN

07 The festival season as a concentration

Twenty-three of our 131 September incidents (17.6%) were directly tied to a festival, a religious observance or an organisational anniversary. They took many forms. We counted at least seven mechanisms running through the same festival calendar: speech from festival platforms, calls to take up arms, provocation outside mosques, stone-pelting during a procession, food-based enforcement, exclusion from festival spaces, and campaigns over loudspeakers and religious sites.

23 incidents tied to a festival, observance or anniversary (17.6% of 131)

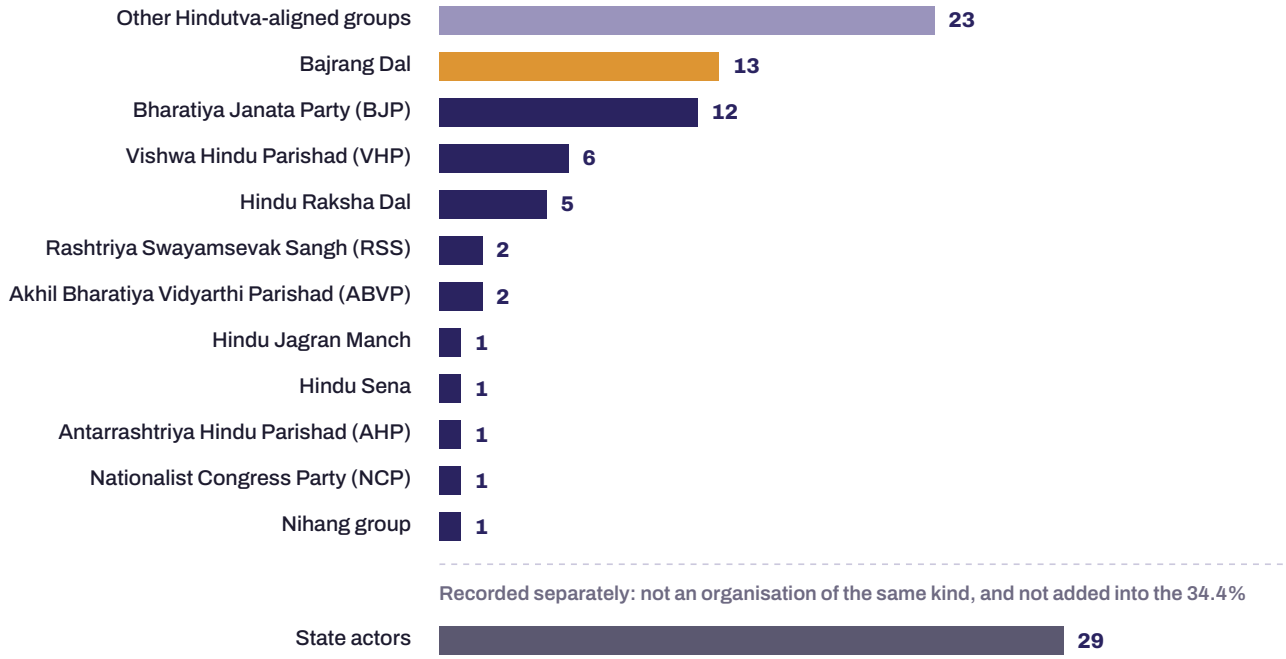


Twenty of the 23 are Acts of Hate. Three more hate-speech incidents took place at Hindutva events that were not festivals; none produced an FIR.

Source: JEM monitoring database, September 2026.

The 23 break down as six VHP foundation-day (Sthapna Diwas) events, seven linked to Ganesh Utsav or Ganesh Chaturthi, three to Janmashtami and Dahi Handi, two each to Varaha Jayanti, Ramleela and Garba, and one to the Shri Badrinath Katha Mahotsav. Twenty of the 23 are Acts of Hate. The other three show the State at work inside the same calendar. In Agar Malwa the municipality razed three meat shops on Ganesh Chaturthi. In Saidabad, Hyderabad, three Muslim residents were taken into custody after chicken waste was found outside a Ganesh pandal. In Bhatkal, stones were thrown at a mosque and madrasa during a Ganesh immersion procession. In Tirunelveli, a shop owner was arrested over a banner showing Ganesha preparing biryani. Three more hate-speech incidents took place at Hindutva events that were not festivals: a mahapanchayat in Loni, an event of the Antarrashtriya Hindu Parishad and Rashtriya Bajrang Dal in Lakhimpur Kheri, and a BJP booth-level meeting in Domariaganj. None of the three produced an FIR.

FIGURE 4 **Named organisational affiliation, where the incident record identifies one (n = 131)**



The eleven named organisations and parties total 45 cases, which is 34.4% of incidents with a named organisational link. A further 23 (17.6%) are recorded only as "other Hindutva-aligned groups". State actors are recorded separately because they are not organisations of the same kind, and their 29 cases (22.1%) are not added into the 34.4%. In 32 incidents (24.4%) no affiliation is recorded or it is entered as not known or not specified, and two records name an individual or a media outlet.

Figure 4. Named affiliation, where the incident record identifies one. Of the 12 BJP incidents, 11 are speeches by party leaders or MLAs and one involves a booth-level agent.

Source: JEM monitoring database, September 2026. Affiliation is recorded only where the incident record names it.

No single organisation dominates this cluster. The VHP's foundation-day events account for six of the 23, but the speakers range from VHP district officials to a monk urging Hindus to take up arms at Ganesh Utsav in Kanpur and Kanpur Dehat, a Maharashtra Minister at Dongri in Mumbai, an MLA dancing with a saffron flag outside a mosque in Ahilyanagar, and the Uttarakhand Chief Minister at a religious festival in Chamoli. That spread is itself a problem for accountability. A loose network of speakers is harder to hold responsible than one named group. But the State's duty to register FIRs and investigate under Section 173 BNSS is independent and does not depend on naming an organisation. Processions and gatherings are held under permissions issued by the administration, so the State has a way to act before an incident and not only after it. No record in our dataset notes a permission being conditioned on, or withdrawn over, speech.

We record affiliation only where the incident record names it. We do not infer it from what we assume a perpetrator believes.

SECTION EIGHT

08 Administrative demolitions and the “bulldozer justice” standard

In September we recorded demolition or sealing action against Muslim places of worship, a cemetery, homes, shops and educational institutions in at least ten places: the Madina and Qasaban mosques and the Shahi Masjid in Ujjain, a mosque inside the Collectorate complex in Saharanpur, a cemetery in Kanpur, the Madina Mosque in Shalimar Bagh, Delhi, an under-construction mosque in Faridabad, 73 houses in Goalpara, a house in Loni, three meat shops in Agar Malwa, and madrasas in Bajpur and Haldwani.

Demolition or sealing action in at least ten places

PLACE	ACTION AGAINST
Ujjain	Madina and Qasaban mosques; Shahi Masjid
Saharanpur	Mosque inside the Collectorate complex
Kanpur	A cemetery
Shalimar Bagh, Delhi	Madina Mosque
Faridabad	Under-construction mosque
Goalpara	73 houses
Loni	A house
Agar Malwa	Three meat shops
Bajpur and Haldwani	Madrasas

Source: JEM monitoring database, September 2026.

There is a clear and binding legal standard for such action. On 13 November 2024, a two-judge Supreme Court bench of Justices B.R. Gavai and K.V. Viswanathan held, in *In Re: Directions in the Matter of Demolition of Structures* (2024 INSC 866), that the executive “cannot become a judge” and punish a person by demolishing their property because they are an accused, or even a convict, in a criminal case. The judgment set mandatory conditions across India: a show-cause notice of at least 15 days, grounds given in writing, a personal hearing before a designated authority, a reasoned final order, time to challenge it, a digital record of the process on a public portal, and personal

accountability for officials who do not comply. It made two exceptions: unauthorised structures in public places such as roads, streets and footpaths, and cases where a court has itself ordered demolition.

What the Supreme Court requires before a demolition

1 · Show-cause notice At least 15 days.	**2 · Grounds in writing** Given to the person affected.	**3 · Personal hearing** Before a designated authority.	**4 · Reasoned final order** Issued after the hearing.
5 · Time to challenge Time to challenge the order.	**6 · Public digital record** Of the process, on a public portal.	**7 · Official accountability** Personal accountability for officials who do not comply.	**Two exceptions** Unauthorised structures in public places such as roads, streets and footpaths; cases where a court has itself ordered demolition.

Source: In Re: Directions in the Matter of Demolition of Structures, 2024 INSC 866 (Gavai and Viswanathan JJ).

Our cases fall into two groups, and the difference matters. Saharanpur and Ujjain are close to or inside the exceptions. In Saharanpur the City Magistrate declared the mosque illegal on 16 July, the district court rejected the committee's appeal on 2 September, and it was demolished on 5 September. The committee says the land was waqf land and the mosque is more than a century old. In Ujjain the demolitions were part of a road-widening project and the High Court found that procedure had been followed. Whether a structure counts as an encroachment on a public way will be argued in each such case, and we believe the communities affected deserve a fair hearing on that question.

Goalpara, Loni, Kanpur, Faridabad and Agar Malwa are harder to place within any exception. In Goalpara, notices were issued on 5 September giving residents 24 hours, and 73 houses were demolished in the early hours of 7 September. The Gauhati High Court judge asked what "imminent danger" justified action on private land and observed that it appeared, prima facie, to be "illegal and unauthorised". In Kanpur the development authority says notice was served under the Uttar Pradesh Town Planning and Development Act, 1973. A cemetery committee member says it arrived a day before the demolition and that the matter was pending before the High Court and a civil court. In Loni the family says no notice was served. In

Faridabad, women who confronted officials during the demolition of an under-construction mosque were reportedly assaulted and had their clothes torn, and no FIR or proceeding against officials has been reported. In Agar Malwa, bulldozers razed three meat shops on Ganesh Chaturthi and proceedings began to cancel the traders’ licences, on the strength of a festival-closure directive. A closure directive is not a ground for demolition. The notice-and-hearing framework applies in full.

Two cases in our record come close to the fact pattern the Supreme Court set out to prohibit: Goalpara, where residents had 24 hours’ notice, and Agar Malwa, where a festival directive was the reason. Both follow the sequence we saw in August in Baheri, where informal pressure over food came first and formal State action against the same trader followed.

Madrasas: regulation and sealing

Reviewed after the system changed

452	179	30	17
madrasas registered under the earlier framework were reviewed	(39.6%) reported as no longer operating	recognised under the new framework	sealed across the State; 3 others stopped operating

Two were sealed in Haldwani on 2026-09-05 and one in Bajpur on 2026-09-02.

Source: JEM monitoring database, September 2026.

In Uttarakhand, 452 madrasas registered under the earlier framework were reviewed after the system changed. Of them, 179 (39.6%) are reported as no longer operating and only 30 have so far been recognised under the new framework. Across the State, 17 madrasas have been sealed and 3 others have stopped operating. Two were sealed in Haldwani on 5 September and one in Bajpur on 2 September. In Bajpur the operator says the registration process was under way and that he had submitted his documents and fee receipt. These facts alone do not prove that the closures were driven by religious discrimination, and we do not need them to. We are asking for fairness. Article 30(1) protects the right of minorities to establish and run educational institutions, and *T.M.A. Pai Foundation v. State of Karnataka* (2002) 8 SCC 481 accepts that recognition standards may be regulated without destroying that right. In *Anjum Kadari v. Union of India* (5 November 2024) the Supreme Court upheld the State’s power to regulate madrasa education. Regulation is lawful. Sealing a madrasa before its registration has been decided is a different thing, and we ask whether that is how these institutions are being treated.

SECTION NINE

09 Media coverage of the documented incidents

Only 33 of the 131 incidents we documented (25.2%) were recorded as covered by mainstream media. Alternative media covered slightly more, 38 cases (29.0%). These figures describe coverage recorded in our own database. They are not a count of every outlet in India. Our media fields capture only the sources we identified while documenting, two cases have a blank media field, and the two categories overlap, so they cannot be added together. The other 96 incidents (73.3%) have no mainstream coverage recorded.

FIGURE 5 **Recorded media coverage in the two tracked categories (n = 131)**

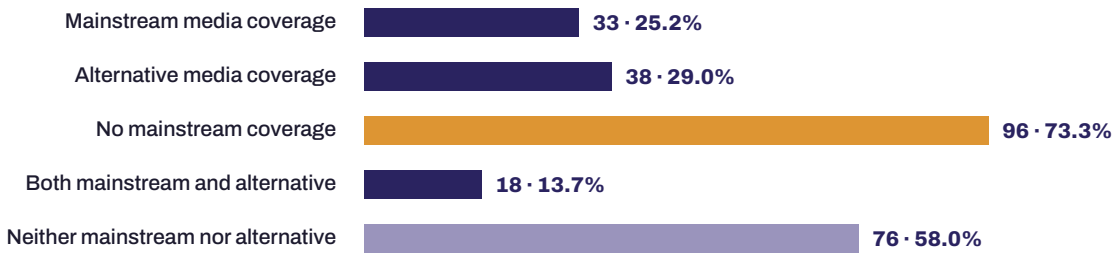


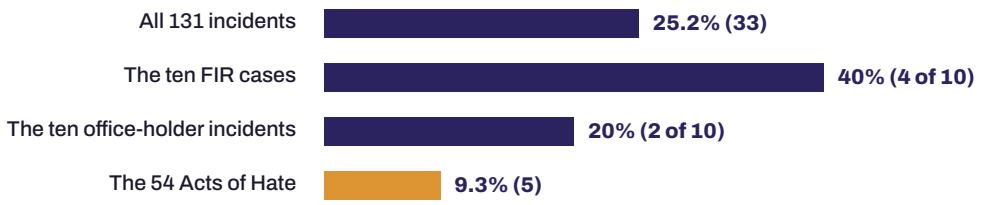
Figure 5. Recorded media coverage in the two tracked categories, out of 131 documented incidents. The categories are not mutually exclusive and cannot be added together. Two cases have a blank media field.

Source: JEM monitoring database, September 2026. Counts reflect sources identified during documentation, not an exhaustive survey of Indian media.

The gap is widest where it matters most. Of the 54 Acts of Hate, only 5 (9.3%) had mainstream coverage recorded. Of the ten incidents involving legislators, a Minister or a Chief Minister, only two did, both involving Rameshwar Sharma. For eight of the ten, we recorded neither mainstream nor alternative coverage. Four of the ten FIR cases had mainstream coverage and six did not.

Even with these limits, the pattern is plain. The incidents that hurt vulnerable communities most at the local level are the ones least likely to get national attention, and speech by people holding public office passed largely unreported. That is why we keep this record. It is not a replacement for journalism. It is a record that stays in place whether or not a national camera crew ever arrives.

Share of incidents with mainstream coverage recorded



Scale 0–50%. For eight of the ten office-holder incidents, neither mainstream nor alternative coverage was recorded; both covered incidents involved Rameshwar Sharma.

Source: JEM monitoring database, September 2026.

SECTION TEN

10 Consolidated legal framework

The provisions below come up again and again in this brief, so we have gathered them here. All statutory citations are to the Bharatiya Nyaya Sanhita, 2023, the Bharatiya Nagarik Suraksha Sanhita, 2023, and the Bharatiya Sakshya Adhiniyam, 2023, the three codes that came into force on 1 July 2024 and apply to offences committed on or after that date.

Which provisions answer which kind of incident

KIND OF INCIDENT	CONSTITUTION	STATUTE	BINDING PRECEDENT
Hate speech	19(1)(a)	BNS 196, 197(1)(c), 351, 353(2)	Amish Devgan; Shaheen Abdulla
Group killing, lynching	21, 355	BNS 103(2)	Tehseen Poonawalla
Attacks on religious spaces	25–26, 30(1)	BNS 298, 299, 300	T.M.A. Pai (madrasas)
Demolition	14, 21	—	In Re: Demolition (2024); Olga Tellis
Failure to register an FIR	—	BNSS 173	Lalita Kumari
Discrimination, boycotts	15, 19(1)(g)	—	—
Detention, citizenship checks	21, 22(2)	—	D.K. Basu; NHRC v. Arunachal
Interfaith couples, vigilantes	—	—	Shafin Jahan; Lata Singh; Shakti Vahini

Source: Compiled from Sections Three to Eight and Section Ten of this brief.

Constitutional provisions

PROVISION	WHAT IT PROTECTS
Article 14	equality before the law and equal protection of the laws
Article 15	prohibition of discrimination on grounds of religion, race, caste, sex or place of birth
Article 19(1)(a)	freedom of speech and expression, subject to reasonable restrictions under Article 19(2)
Article 19(1)(b)	the right to assemble peaceably and without arms

PROVISION	WHAT IT PROTECTS
Article 19(1)(g)	freedom to practise any profession or carry on any occupation, trade or business
Article 21	protection of life and personal liberty, held to include the right to shelter, livelihood and dignity, and available to non-citizens
Article 22(2)	production of a person arrested or detained before a magistrate within 24 hours
Articles 25 to 26	freedom of conscience and religious practice; the right of religious denominations to manage their own affairs
Article 30(1)	the right of religious and linguistic minorities to establish and administer educational institutions
Article 141	Supreme Court law is binding on all courts and authorities in India
Article 188	oath or affirmation of members of a State Legislature to bear true faith and allegiance to the Constitution
Article 355	the Union's duty to protect States against internal disturbance

TABLE 2 **Key statutory provisions (BNS 2023, with prior IPC reference)**

OFFENCE	BNS SECTION	PRIOR IPC SECTION
Murder	103(1)	302
Murder by group of five or more, on identity grounds	103(2)	No direct antecedent
Culpable homicide not amounting to murder	105	304
Voluntarily causing hurt	115	323
Insulting the modesty of a woman by word or gesture	79	509
Unlawful assembly	189	141 to 149
Rioting	191	146 to 147
Criminal intimidation	351	503, 506
Promoting enmity between groups	196	153A
Assertions prejudicial to national integration	197	153B
Defiling a place of worship to insult religion	298	295
Deliberate or malicious acts to outrage religious feelings	299	295A
Disturbing a religious assembly	300	296
Statements promoting enmity or ill-will between groups	353(2)	505(2)

OFFENCE	BNS SECTION	PRIOR IPC SECTION
Obstruction in a public way	285	283
Public nuisance	292	290
FIR registration on a cognizable offence (BNSS)	173 (BNSS)	154 (CrPC)

Table 2. Key statutory provisions (BNS 2023, with prior IPC reference). Other statutes engaged: the Representation of the People Act, 1950 (Section 31, false declarations in electoral-roll proceedings); the Madhya Pradesh Freedom of Religion Act, 2021; the Information Technology Act, 2000; and the Immigration and Foreigners Act, 2025.

Source: Bharatiya Nyaya Sanhita, 2023; Bharatiya Nagarik Suraksha Sanhita, 2023.

Binding judicial precedent

PRECEDENT	HOLDING
Lalita Kumari v. Government of Uttar Pradesh, (2014) 2 SCC 1	mandatory FIR registration on receipt of information disclosing a cognizable offence
Tehseen S. Poonawalla v. Union of India, (2018) 9 SCC 501	preventive, remedial and punitive directions on mob lynching and cow vigilantism, binding under Article 141
Shaheen Abdulla v. Union of India, W.P.(C) 940/2022 (orders of 21 October 2022 and 28 April 2023)	registration of cases on hate speech without waiting for a complaint, extended to all States and Union Territories; delay treated as contempt
Amish Devgan v. Union of India, (2021) 1 SCC 1	limits of Article 19(1)(a) protection for speech intended to outrage religious feelings
Olga Tellis v. Bombay Municipal Corporation, (1985) 3 SCC 545	the right to livelihood as part of the right to life under Article 21
In Re: Directions in the Matter of Demolition of Structures, 2024 INSC 866	mandatory notice, hearing, reasoned order and official accountability before any demolition connected to an accused or convicted person, with stated exceptions for public places and court-ordered demolition
D.K. Basu v. State of West Bengal, (1997) 1 SCC 416	safeguards on arrest and detention
National Human Rights Commission v. State of Arunachal Pradesh, (1996) 1 SCC 742	Article 21 protection extends to non-citizens
T.M.A. Pai Foundation v. State of Karnataka, (2002) 8 SCC 481	minority educational institutions and permissible regulation
Shafin Jahan v. Asokan K.M., (2018) 16 SCC 368, *Lata Singh v. State of U.P.*, (2006) 5 SCC 475, and *Shakti Vahini v. Union of India*, (2018) 7 SCC 192	the right of adults to choose a partner and a faith, and the duty of the police to protect them

SECTION ELEVEN

11 What we are asking for

What follows comes straight from the gaps we have set out in this brief. We have grouped our requests by the people best placed to close each gap.

POLICE AND DISTRICT ADMINISTRATIONS

1. We ask for FIRs to be registered on their own motion for every public speech that engages Sections 196, 197, 299 or 353(2) BNS, as the *Shaheen Abdulla* directions require, whoever the speaker. Where no FIR is registered in a case involving a sitting legislator, Minister or Chief Minister, the reasons should be recorded in writing.
2. We ask for strict and verifiable compliance with *Lalita Kumari:* every complaint that disclosed a cognizable offence should lead to an FIR under Section 173 BNSS, with any preliminary inquiry under Section 173(3) finished within 14 days and justified in writing.
3. We ask for the *Tehseen Poonawalla* nodal-officer system to be put to work in Uttar Pradesh, Madhya Pradesh, West Bengal and Uttarakhand, with monthly public reports on FIRs and chargesheets in hate-crime and mob-violence cases.
4. In every group killing, we ask investigators to consider and record whether Section 103(2) BNS applies, as in the Khowai lynching, and not to default to Section 103(1). Where an FIR exists but no one has been arrested, we ask for a public report on progress.
5. We ask that the disruption of private worship be treated as the first offence in the sequence. A complaint by a vigilante group alleging conversion should not, on its own, be enough to arrest or charge worshippers.
6. We ask for independent inquiry and public reporting on every incident where the police are the accused, and on joint action by police and vigilantes as in Ratlam and Sidhi. Detained persons must be produced before a magistrate within 24 hours under Article 22(2), and claims of citizenship must be checked against documents before anyone is detained or removed.

MUNICIPAL AND DEMOLITION AUTHORITIES

7 We ask that no demolition or sealing order against a Muslim-owned business, home, or place of worship or education be issued without documented compliance with the notice, hearing and reasoned-order requirements of the November 2024 judgment, including the 15-day minimum notice.

8 We ask that the digital demolition-tracking portal the Court required be kept up and made public in every district where we recorded demolitions this month.

9 Festival-closure directives and vigilante pressure over food must never be used as grounds for demolition or for cancelling licences, as happened in Agar Malwa.

10 Where a demolition is followed by protest, we ask that the rules on proportionate use of force be followed and that injuries to protesters be recorded, as in Ujjain and Faridabad.

STATE GOVERNMENTS

11 We ask for consolidated quarterly hate-crime data by district, offence category and outcome, including FIRs registered, FIRs against members of the affected communities, and arrests.

12 In Uttarakhand, we ask for the criteria for madrasa recognition to be published and for institutions with registration pending to be given a fair chance to complete it before they are sealed.

13 We ask for guidance to the police on private worship and the State's conversion law, so that the law is not turned against believers.

14 We ask for victim compensation and rehabilitation, in line with *Tehseen Poonawalla*, for the victims and families in the lynching, murder and demolition cases in this brief.

ELECTION AUTHORITIES

15 We ask for an audit of bulk Form 7 deletion applications, as in Godda, and for action under Section 31 of the Representation of the People Act, 1950 where the filings are false.

16 We ask for disaggregated data on names marked for deletion in the voter-roll revision, so that claims of unequal impact, as in Hyderabad, can be checked.

NATIONAL HUMAN RIGHTS INSTITUTIONS AND THE COURTS

17 We call on the National Human Rights Commission to take suo motu cognizance of the Khowai lynching and of the demolition pattern in this brief, and we ask the National Commission for Minorities to publish the outcome of its inquiry into West Bengal.

18 The Supreme Court disposed of the National Federation of Indian Women compliance petition in February 2025 and sent aggrieved persons to the High Courts. Consolidated, district-wise compliance data of the kind we gather should therefore be placed before the relevant High Courts and State Human Rights Commissions. The 25 public hate speeches with no FIR should also go before whichever forum is monitoring the *Shaheen Abdulla* directions.

MEDIA AND CIVIL SOCIETY

19 We will keep expanding independent, source-verified documentation, which is still the only systematic record of cases that get little coverage elsewhere.

20 We will record organisational affiliation only where the incident record names it, so that our findings stay credible and usable in legal proceedings.

21 Because 73.3% of the incidents had no mainstream coverage, we ask regional and district-level journalists, especially in Uttar Pradesh, Madhya Pradesh, West Bengal and Uttarakhand, to work with us. A low count in a State may mean little reporting, not few incidents. We also stand with journalists and outlets facing FIRs over their reporting, as in Shamli and West Bengal.

SECTION TWELVE

12 Conclusion: a gap that persists until it is measured

September 2026 shows a cycle we know well: communal rhetoric, religious vigilantism, social intimidation and official action meeting across 131 incidents in 20 States and Union Territories and online. Uttar Pradesh is still the most documented State, but it no longer accounts for nearly half of what we recorded, and Madhya Pradesh and West Bengal have risen to match it.

The most important finding this month is not one case, however serious. It is the distance between how much hate we documented and how little the State did about it. Acts of Hate are 41.2% of our incidents. The confirmed-FIR rate is 7.6% and the confirmed-arrest rate is 2.3%. Not one of the 25 hate speeches made at public gatherings led to an FIR. Ten incidents involve sitting legislators, a Minister or a Chief Minister. And where the police did act, our record shows them acting at least as often against the communities that were attacked as against the people accused of attacking them. All of this sits against a binding judicial mandate: *Tehseen Poonawalla*, reinforced for speech in *Shaheen Abdulla* and for demolitions in the November 2024 guidelines. On the record we have been able to assemble, that mandate has not been carried out.

One qualification should travel with every number above. 131 is a floor, not a ceiling. It is what our team could independently document in one month with the sources and methods open to an independent monitor, and 17 of those incidents are still waiting for a second source. We are not saying that only 131 incidents happened. An incident with no legal response and no mainstream coverage has still happened. It becomes invisible to the systems meant to hold people accountable unless someone writes it down carefully. That is why we do this, and why we will do it again next month.

SECTION THIRTEEN

13 A note on sources

The incident-level record for this brief is the JEM monitoring database for September 2026, where each incident carries its primary and corroborating sources. Researchers can request those sources from us. The scholarly and comparative material in this brief draws on the following works and reports:

Paul R. Brass, *The Production of Hindu-Muslim Violence in Contemporary India* (Seattle: University of Washington Press, 2003).

Ashutosh Varshney, *Ethnic Conflict and Civic Life: Hindus and Muslims in India* (Yale University Press, 2002).

Susan Benesch, *Dangerous Speech: A Practical Guide* (Dangerous Speech Project, 2021).

Human Rights Watch, *Violent Cow Protection in India: Vigilante Groups Attack Minorities* (2019).

IndiaSpend, cow-related violence database, 2010 to 25 June 2017, and Hate Crime Watch, 2009 to 2018. National Crime Records Bureau, *Crime in India 2017* (published 21 October 2019), together with the Ministry of Home Affairs statement of October 2019 on crime heads collected but withheld.

Supreme Court of India: *Shaheen Abdulla v. Union of India*, orders of 21 October 2022 and 28 April 2023; *In Re: Directions in the Matter of Demolition of Structures*, judgment of 13 November 2024; *Anjum Kadari v. Union of India*, judgment of 5 November 2024; and the order of 11 February 2025 in the National Federation of Indian Women petition on compliance with *Tehseen S. Poonawalla*.

News Broadcasting and Digital Standards Authority, order of 11 September 2026 concerning Zee News.

HOW TO CITE THIS BRIEF

Justice and Empowerment of Minorities, *131 Incidents, 10 FIRs, 3 Arrests: What September 2026 Shows About Hate Against Minorities and the State's Response to It*, Monthly Analytical Brief, October 2026, JEM-MAB-2026-09.

Justice and Empowerment of Minorities
An initiative of the Jamiat Ulama-i-Hind

Monthly Analytical Brief • September 2026

What September 2026 Shows About Hate Against Minorities and the State's Response to It

REFERENCE
JEM-MAB-2026-09

PUBLISHED
October 2026

ONLINE
jem.org.in