

SEP 19 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Kashmir Khalistan Referendum Front "KKRF"
 a non profit organization;
 Ms. TFK; an individual¹
 Mr. SMS, an individual²
 for themselves and
 their detained, disappeared, tortured and deceased
 relatives, left presently unnamed

Plaintiffs,

v.

 Narendra MODI,
 a national of India and
 Prime Minister of India

 Amit SHAH,
 a national of India
 and Union Home Minister of India

 Kanwal Jeet Singh DHILLON
 Lt. General of Indian Army,
 Commander of Indian Forces in Indian occupied
 Kashmir

Defendants

19 CV 3532

Civ. No. _____

COMPLAINT

CLASS ACTION

JURY TRIAL DEMANDED

The Plaintiffs, allege the following:

I. PRELIMINARY STATEMENT

^{1 & 2} The Plaintiffs "TFK" and "SMS" are natural persons, individuals and residents of the United States who are withholding their complete names at this stage of the proceedings owing to well-founded fear of retaliation from the state and non-state actors against their family members residing in India. Acting under the acronyms, the Plaintiffs affirm their statements and narrative provided in this complaint and plaintiffs will be available for in person and in camera appearance before the court to testify, if and when required by this court.

1. On August 5, 2019, the Indian government, headed by the defendant Narendra Modi with the active cooperation of the defendant Amit Shah illegally, unilaterally and in violation of international law annexed the region of Jammu and Kashmir which had been under the occupation of India since 1947.
2. Since then, through defendant Kanwal Jeet Singh Dhillon, defendants Modi and Shah have enforced a complete and violent clamp down³ which includes, curfew, complete communication lock down, depravity of basic necessities to the inhabitants, illegal detentions, enforced disappearances, torture and extra judicial killings⁴.
3. September 14, 2019 news published by the Associated Press reports the situation in Kashmir under defendants' control, as:

“Dar’s account of violence and intimidation by Indian soldiers was not unusual. In more than 50 interviews, residents in a dozen villages in Kashmir told The Associated Press that the military had raided their homes since India’s government imposed a security crackdown in the region on Aug. 5. They said the soldiers inflicted beatings and electric shocks, forced them to eat dirt or drink filthy water, poisoned their food supplies or killed livestock, and threatened to take away and marry their female relatives. Thousands of young men have been arrested”.

See AP Sept 14 report “*Kashmiris allege night terror by Indian troops in crackdown*” at:

<https://www.apnews.com/52b06a124a5a4469984793d3c208733d>

³ See August 15th report by The Economist “In its struggle to subdue Kashmir, India is stripping it of liberties” <https://www.economist.com/asia/2019/08/15/in-its-struggle-to-subdue-kashmir-india-is-stripping-it-of-liberties>

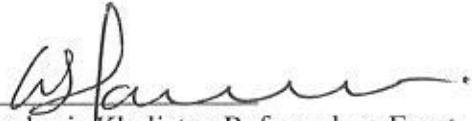
⁴ See AFP report dated Sept 10, 2019 “Kashmir families allege brutality by Indian forces” <https://news.yahoo.com/kashmir-families-allege-brutality-indian-forces-085243984.html>

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants Modi, Shah and Dhillon, as follows:

- a. For compensatory damages in the amount of one hundred (100) million dollars.;
- b. For punitive and exemplary damages in an amount to be proven at trial;
- c. For such other, further, or different relief as this honorable Court may deem to be just, proper, fitting, and equitable.

Submitted on: September 19, 2019.



Plaintiff - Kashmir Khalistan Referendum Front (KKRF) through its coordinator
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