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CASE ANALYSIS OF “AJIT MOHAN V. LEGISLATIVE ASSEMBLY NATIONAL CAPITAL TERRITORY OF DELHI”

AUTHORED BY - KANAV BHARGAVA & SAMARTH SHARMA

INTRODUCTION

The basic safeguards and freedoms provided in the Indian constitution known as ‘fundamental rights’ attempts to ensure that the citizens of India have their rights upheld. According to a parliamentary perspective, these Fundamental Rights provided under the Constitution of India have great sale for they are the basis upon which the entire freedom of a person is built and the rule of law, fairness and equity prevails. This abstract discusses the relevance of Fundamental Rights within the Indian scenario with respect to its emergence, the role it plays in the defense of democracy and its effects on the economy. Such many fundamental rights were enshrined in the government of India resulting. The Constitution commended in 1950 encompassed laws on Fundamental Rights that allow people to be protected against arbitrary suppression with respect to equality before law, freedom to speak, freedom not to be discriminated and freedom of life and personal liberty. These rights were influenced by India’s struggle for independence and the post-colonial need for reparations for the past injustices. Fundamental Rights are very important elements of the Democracy and protect its important aspects. In essence, they seek to realize, ‘**rule of law rather than the rule of men**’.

Until December 2021, India does not have roll out any Privacy Law. However, proposed “Personal Data Protection Bill” is most likely to pave way for privacy law in due course by introducing in parliament through Joint Parliamentary Committee during winter session. Therefore, so far, it is deemed to be a guiding line “Supreme Court Ruling of 2017” which asserted the Right To Privacy As A Fundamental Right.

According to the fundamental rights and laws that has been mentioned and explained in brief in front of the court in the case of *Ajit Mohan v. Legislative Assembly National Capital*

*Territory of Delhi*¹. To begin with, every citizen of India is guaranteed the fundamental right to the guaranteeing freedom of Speech and Expression according to ‘Article 19(1) (a)²’ of the Constitution of India. Some general statements that help explain the significance of this right are as follows: It covers also the right to reproduction of opinions and ideas in different ways. People have the right to give and receive any information using any media. This includes support to press freely. It provides room for free flow of thoughts and ideas. This right also entails the right to silence. It is not compulsory for anybody to utter or give views against their desire.

In the same vein, the ‘Article 21³’ of the Indian Constitution which stands for ‘Protection of Life and Personal Liberty’ states that No all person should be deprived and or violate any single person from his Life and or his Personal Liberty. The right to life, a basic human right, is a fundamental right that all citizens, people, and foreigners can exercise. In the Indian Constitution, Article 21⁴ is one of the most vital whereby it concerns the very core of the rights of the people – ‘Personal Liberty and Right to Life’. Article 21⁵, time has elapsed; it has undergone changes in its nature with particular reference to its interpretations over time and how its use has enhanced the protection of persons in India.

In this connection, the court mentioned some other Parliamentary privileges of which members of Parliament and their committees as well have special rights, immunities, and exemptions. These privileges are explained in article 105⁶ of the Indian Constitution, and Article 194⁷ of the Indian Constitution evokes both privileges to all Members of Legislative Assemblies of the states. Under these privileges, reasons of civil liability (but not criminal liability) is not attached to the members of Parliament with regard to any statement made or act done in the course of undertaking parliamentary duties.

The understanding of the people of Delhi and the case of Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi and the features of governance are determined respectively

¹ Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi, AIR 2021 SC 3346

² INDIA CONST. art. 19, § 1, cl. a.

³ INDIA CONST. art. 21

⁴ INDIA CONST. art. 21

⁵ INDIA CONST. art. 21

⁶ INDIA CONST. art. 105

⁷ INDIA CONST. art. 194

in particular the governance structure of National Capital Territory of Delhi by article 239AA⁸ of the constitution. The recent SC ruling that interpreted Article 239AA⁹ was struck down with the issuance of the bill which sought to create the National Capital Civil Services Authority. Article 239AA¹⁰ was one of the constituent parts of the Constitution inserted through the 69th amendment in 1991. It gave Delhi the status of a Union territory under the union of India as was suggested by the S. Balakrishnan Committee. The provision makes a place for the Administrator of Delhi and a Legislative Assembly, outlining the scope of their powers and the restriction as well.

The *Ajit Mohan v. legislative assembly NCT of Delhi*¹¹ was one of the earliest judgment delivered by the supreme court on informational privacy. The three-Judges bench of the court and matter was about “whether giving evidence in front of a parliamentary or legislative sub-committee dissent affects a person’s privacy and freedom of speech guaranteed by the constitution” and decide on it.

ANALYSIS AND CRITICAL ANALYSIS

Explicating all of these provisions, understanding all of these laws and articles has led us to our case of “*Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi (2021)*”¹² where the Supreme Court of India observed that summoning an individual for giving testimony in the State Legislature Committee will not violate the individual looking to extend the constitutional provisions related to freedom of speech & expression, and privacy as well.

As an aftermath of communal riots in different locations of Delhi, the Government of National Capital Territory of Delhi which can also be referred to as “Delhi” founded the Committee on ‘Peace and Harmony’. The Committee came across allegations which claimed that during the riots Facebook was utilized to disseminate hate speech. Therefore, the Committee served a notice to Ajit Mohan, Vice President and Managing Director, Facebook India to appear for deposition as a witness.

⁸ INDIA CONST. art. 299AA

⁹ INDIA CONST. art. 299AA

¹⁰ INDIA CONST. art. 299AA

¹¹ *Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi*, AIR 2021 SC 3346

¹² *Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi*, AIR 2021 SC 3346

The Petitioners went to Court in a bid to have the Committee's summons set aside, and contended that their right to freedom of speech and expression, and right to privacy was being violated. The Committee went further and stated that the summons were issued to a person with the use of the Committee's parliamentary power to call a person and call upon him to give evidence of fact.

The petition was not able to convince the court hence it was dismissed and the court held that issuing of summons does not infringe upon the petitioners' freedom of speech and the right to privacy. The Court withholding determination as to whether that parliamentary privilege goes necessitating the attendance of a person to give evidence infringes upon the rights of freedom of expression and privacy within the walls of the legislature. It pointed out that this issue was awaiting determination by a bigger division of the Audience. The matter which was placed before the Court was primarily a law and order matter and it was confined to the task of how far the terms 'peace and harmony' could be stretched. The court rightly acknowledged the fact that the police are not the only defenders of peace and harmony in the state. The term has many connotations and even though the State functions in a power-log constrained approach, its active role of peace and harmony maintenance in the National Capital, for example, is of great significance. This inquisitorial and recommendatory function of the Committee is in conformity within the limits of good governance and the principle of good governance.

In the case of "*K.S. Puttaswamy v. Union of India (2017)*"¹³ where the landmark judgement was marked and recognized the right to privacy as a fundamental right under the Article 21¹⁴ of the Indian constitution. Where the court has ruled that privacy is an inseparable part of the right to life and personal liberty, and highlighting the freedom for people to decide what to do with their personal information. It established that while the right to privacy is a fundamental right, it is not an absolute and can be restricted under some certain circumstances, such as legitimate state interests provided. As in the Ajit Mohan case where both the cases highlighted the judicial role in safeguarding individual rights against state overreach and reinforcing the need to balance between the legislative authority and the personal freedoms that were provided to an individuals by the constitution of India. The right to privacy has been identified in the case of Puttaswamy case as a part of the fundamental right and enhances the legal framework within, which the judiciary assesses the limits the legislative inquires and the protection of an

¹³ K.S. Puttaswamy v. Union of India (2017), AIR 2018 SC (SUPP) 1841

¹⁴ INDIA CONST. art. 21

individual liberties in the digital age. This has been more classified and explained in the case of “*N. Ravi v. T.N. Legislative Assembly (2003)*¹⁵” where the case is concerning the balance between legislative privileges and the freedom of the press and speech and expression under the Indian constitution. The case arises when the Tamil Nadu Assembly attempted to imprison journalists from The Hindu and from Murasoli for publishing and printing critical content of the then Chief Minister, J. Jayalalithaa. The Supreme Court involved, and staying the arrests and emphasizing the necessity of protecting journalistic freedom as a fundamental right under the Article 19(1)(a)¹⁶ of the constitution. Where the court highlighted that legislatures bodies have privileges, and these should not be infringed upon the press ability to critique government actions. The case is particularly relevant to the Ajit Mohan case where they have similar issues of legislative authority and the individual rights are examined by the court. Both the cases involved the judiciary’s role in representing the boundaries of legislative privileges and protecting fundamental rights, particularly related to the context of vibrant democracy and reflects the need for clarity in the relationship between the legislative powers and the freedom of expression, in the era of the social media and digital platforms in public discourse.

In “*People's Union for Civil Liberties (PUCL) v. Union of India (1997)*¹⁷” where the supreme court held that unauthorized phone tapping violated the fundamental right to privacy, which is implicit in article 21¹⁸ of the constitution. Where the court emphasized that the right to privacy must be protected against the state actions and any infringement must adhere to the established legal procedures. Similarly in the Ajit Mohan case where both cases are relevant to the context of fundamental rights, concerning privacy, free speech and the role of state in regulating individual rights and where the supreme court has examined the Delhi Assembly’s authority to summon Facebook executives and vice-president regarding their role in Delhi riots, and balancing legislative privileges with the fundamental rights of individuals under the Article 19¹⁹ and Article 21²⁰ of the Indian constitution and highlight the judiciary role in protecting the individual rights against state overreach, particularly in the digital age where privacy and free speech are increasingly at risk in India. In PUCL judgement reinforces while the state regulatory powers, and must be exercised with the respect for the

¹⁵ N. Ravi v. T.N. Legislative Assembly (2003), 2003(9)SCALE464

¹⁶ INDIA CONST. art. 19, § 1, cl. a.

¹⁷ People's Union for Civil Liberties (PUCL) v. Union of India (1997), AIR1997SC568

¹⁸ INDIA CONST. art. 21

¹⁹ INDIA CONST. art. 19

²⁰ INDIA CONST. art. 21

individual rights, including privacy and free speech and expression. Similarly in “*Mohammad Hamim & Anr. v. Facebook India Online Services Pvt. Ltd. (2024)*²¹” case the highlights the significant issues surrounding hate speech and the responsibilities of social media platforms in regulatory framework established by the Information Technology Rules, 2021. In this case, the delhi high court declined to impose prior censorship on Facebook despite allegations of promoting hate speech against the Rohingya community. This case is relevant to the Ajit Mohan case where the Supreme Court examined the Delhi Assembly Authority to summon Facebook executives regarding their role in it. Both of the cases evolving landscape of digital rights and responsibilities in India and highlighting the judiciary role in navigating the free speech, legislative privileges and the regulatory obligations of the social media platforms. These cases contribute to the discourse how to effectively manage the hate speech and misinformation while protecting the fundamental rights of an individuals in present time.

In “*Shreya Singhal v. Union of India (2015)*²²” held that responsibilities of inline intermediaries, stating that they are only liable to remove content upon receiving a court order. Where the supreme court struck down Section 66A of the Information Technology Act, 2000 for being unconstitutional as it violated the Article 19(1)(a)²³ of constitution (freedom of speech). And this principle is relevant to the Ajit Mohan case where the court asses the Delhi Assembly’s Inquiry into Facebook’ role on it. As to where the Assembly attempted to call Facebook's executives (vice-president), and brought in intermediaries and their relevance to content regulation on social media, and Shreya also, as did those concerned with free speech, established the power of the courts to nullify constitutional and other acts democratic processes. Shreya Singhal made it clear that such limitations must be narrowly construed, whereas Ajit Mohan called for these privileges to be reconciled with individual’s rights. This understands and explains why, in Ajit Mohan, Shreya Singhal has provided important legal rules which the Supreme Court uses in the case- especially protecting the freedom of speech and clarifying the role of agents in modern society. Similarly in “*A.K. Gopalan v. State of Madras (1950)*²⁴” where the Supreme Court held that the preventive detention laws, ruling that Article 21²⁵ right to personal liberty could be restricted without a fair trial, and allowing state power over individual freedoms. Both cases involve the judiciary role in protecting Fundamental rights

²¹ Mohammad Hamim & Anr. v. Facebook India Online Services Pvt. Ltd. (2024), W.P.(C) 1227/2024

²² Shreya Singhal v. Union of India (2015), AIR 2015 SUPREME COURT 1523

²³ INDIA CONST. art. 19, § 1, cl. a.

²⁴ A.K. Gopalan v. State of Madras (1950), AIR 1950 SC 27

²⁵ INDIA CONST. art. 21

against state actions upon an individuals. While Gopalan permitted state encroachment on personal liberty, where Ajit Mohan demonstrates towards safeguarding the individual rights from legislative to deceive. This highlights the critical judicial involvement as a guardian of fundamental rights in India, and showcasing the dynamic nature of constitutional interpretation and the struggles to uphold the personal liberties against the state powers over an individual rights.

In the context of the “*Subramanian Swamy v. Union of India (2016)*²⁶” where it interplay between legislative privileges and fundamental rights in India examining along with the Ajit Mohan case. The court upheld the criminal defamation laws, ruling that they impose restrictions in free speech under the Article 19(2)²⁷ of the constitution. And this principle of balancing rights equally applicable in Ajit Mohan, where the Delhi Assembly privileges under the article 194²⁸ of the constitution has to be reconciled with the fundamental rights of Facebook executives. Both of the cases has examined their respective boundaries in the case and analysis these two cases is valuable for understanding the jurisprudence on the limits of legislative powers in India over a state involvement in individuals fundamental rights and navigates the complex relationship between the legislative powers and privileges and constitutional freedoms. Similarly in the Supreme Court judgement that defines and speak about the Article 239AA²⁹ of the Indian Constitution in the case of “*NCT of Delhi v. Union of India (2018)*³⁰” where the Ajit Mohan case has relevance to the interplay between the legislative powers, privileges and fundamental rights in the National Capital Territory (NCT) of Delhi. They highlighted the need to balance the administrative role, the elected government’s powers and the legislative Assembly privileges, and the protection of the fundamental rights and the distribution of powers in the governance of the national capital.

In The issues encountered in Ajit Mohan pertain to the interpretation of Article 21³¹ as outlined in the judgement handed down by the Supreme Court in “*Maneka Gandhi v. Union of India (1978)*³²”. The court has stretched the meaning of personal liberty in article 21 and extends to the Delhi Assembly’s summons in Ajit Mohan which must also conform to the due process.

²⁶ Subramanian Swamy v. Union of India (2016), AIR 2016 SC 2728

²⁷ INDIA CONST. art. 19, § 2

²⁸ INDIA CONST. art. 194

²⁹ INDIA CONST. art. 239AA

³⁰ NCT of Delhi v. Union of India (2018), AIR ONLINE 2018 SC 1029

³¹ INDIA CONST. art. 21

³² Maneka Gandhi v. Union of India (1978), 1978 SCR (2) 621

The case has stated a relation between the Articles 14, 19 and 21 and referred as 'The Golden Triangle'. In both instances there is clash between the right to free speech guaranteed by the Article 19(1)(a)³³ of the Constitution. Maneka Gandhi acts as a raw foundation, which influenced the Supreme Court's view towards Ajit Mohan, especially while extending the rights of personal liberty and against the encroaching nature of fundamental rights by the legislature.

Similarly in landmark case of "*R. Rajagopal v. State of Tamil Nadu (1994)*³⁴" that established key principles regarding the freedom of press and right to privacy in India. The Supreme Court has ruled that freedom of press has the right to publish information that is for the public interest and welfare of the public and provided it is done responsibly, without any malice and the press freedom is implicit in Article 19(1)(a)³⁵ of the Constitution. They both have involved between the individuals rights and the right to information to the public. Where Rajagopal has seen that the necessity of protecting freedom of press while ensuring the individuals rights are not infringed upon. the need to guarantee one's individual freedom while respecting the freedoms of the press. Consequently, the Court's decision in each case highlights the corresponding emphasis on the burdens of citizenship whereby the press can be exercised in the service of journalism but not conflict individual rights and contributing to the discourse on evolving the nature of these rights in a democratic society.

CASE COMMENT

The Supreme Court's decision in "*Ajit Mohan v. Legislative Assembly National Capital Territory of Delhi*" where it addresses critical surrounding legislative authority, role of social media platforms in public interests, and the individual rights. The case has been arose from the Delhi Assembly's summons to Ajit Mohan, the Vice President of Facebook, amongst investigations into the allegations role in facilitating the hate speech during the February 2020 riots in Delhi. The court upheld the assembly's power to summon the individuals, highlighting the fact that these kinds of investigations are necessary to keep the peace in the community and preserve public order. It did, however, also acknowledge the necessity of defending individual

³³ INDIA CONST. art. 19, § 1, cl. a.

³⁴ R. Rajagopal v. State of Tamil Nadu (1994), AIR 1995 SC 264

³⁵ INDIA CONST. art. 19, § 1, cl. a.

rights, notably those related to privacy and free speech. The court has clarified that “*while the Assembly has the authority to compel attendance, individuals could refuse to answer questions that encroach upon areas strictly reserved for law enforcement, such as police powers.*” This shade ruling reflects a balancing act between the legislative privileges and powers and constitutional rights, acknowledging the importance of the social media companies while protecting the freedom of fundamental rights to an individuals. The case reveals the ongoing tensions in Indian democracy with regard to the legislative process and regulation of the digital platform. It creates apprehensions regarding the scope of parliamentary inquiries and their impact upon individual liberties.

Ultimately, this ruling sets a benchmark for future judgments which would involve encroachments upon legislative powers and the extent of personal freedoms, thus re-justifying the very existence of the courts in settling conflicts between the sedate arm of the state, on the one hand, and the individual on the other.

CONCLUSION AND SUGGESTIONS

The Supreme Court's decision in the case of **Ajit Mohan v. Legislative Assembly N.C.T. of Delhi** highlights the essential balance between legislative power and individual rights in a democracy. While the court recognized the right of the legislative assembly to conduct inquiries, it also stressed the necessity of safeguarding personal freedoms, including free speech and privacy. This ruling is important in shaping the ongoing dialogue regarding the accountability of social media platforms and their impact on public safety. To better navigate this balance, lawmakers must establish explicit guidelines that delineate the boundaries of legislative inquiries, ensuring that they do not violate constitutional rights. Furthermore, there should be a framework developed for social media companies that mandate transparency and accountability in their operations, especially concerning content moderation and user safety. Implementing regular training programs for legislators focused on constitutional rights and digital literacy could promote a more informed approach to governance in our increasingly digital society. Additionally, creating independent oversight bodies to review legislative inquiries could help prevent potential abuses of power while enhancing accountability. Fostering a collaborative environment where legislative bodies, social media platforms, and civil society can engage constructively will be vital in addressing the complexities of modern

governance and protecting individual liberties in a digital age.

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