

## Complaint against Sector 12 Police Station for refusal to register an FIR regarding a barbaric act of sexual assault against a community dog at Punjab Engineering College

Meet Ashar <AsharM@petaindia.org>

Tue 13-08-2024 18:55

To:dgp-chd@nic.in <dgp-chd@nic.in>

Cc:dirah-chd@nic.in <dirah-chd@nic.in>;jdahus-chd@nic.in <jdahus-chd@nic.in>;dc-chd@nic.in <dc-chd@nic.in>;admr-chd@nic.in <admr-chd@nic.in>;Prachi Jain <support-awbi@gov.in>;Sujit Kumar Dutta <sk.dutta@nic.in>;pppgi-chd@nic.in <pppgi-chd@nic.in>;pssput-chd@nic.in <pssput-chd@nic.in>;dig-chd@nic.in <dig-chd@nic.in>;enquiry@rabdejeev.com <enquiry@rabdejeev.com>

 6 attachments (9 MB)

Annexure 1.mp4; Annexure 2.pdf; Annexure 3.pdf; Annexure 4.pdf; Annexure 5 Email complaint to SP Chandigarh.pdf; Annexure 6 - AWBI letter.pdf;

Dear Shri Yadav ji:

I am writing to you on behalf of People for the Ethical Treatment of Animals (PETA) India, the country's best known animal rights organisation and in the capacity of an honorary animal welfare representative of the Animal Welfare Board of India (AWBI), a statutory body of the Ministry of Fisheries, Animal Husbandry and Dairying, Government of India, to bring to your attention an extremely disturbing incident concerning a barbaric act of sexual assault against a community dog and an attempt to maim her. This happened on the campus of Punjab Engineering College (PEC), Sector 12, Chandigarh. I am writing to request that you pass directions to register a first information report (FIR) against the alleged offender in this regard.

The heinous act of sexual abuse was captured on video by a woman who happened to witness the event and promptly recorded it. The video evidence attached as **Annexure 1**, depicts a man, later identified as Mr Chandra Mohan, inserting his fingers into the dog's vagina – an act that is not only invasive but can also inflict severe pain and potential injury to the animal. Further, he is seen moving his face between the dog's hind legs and attempting to control the animal with the apparent intention of continuing his sexual assault.

Mohan, identified from the video, is a resident of Aravali Hostel, PEC, Sector 12, Chandigarh and works in the same college as a cook in the Himalaya Hostel for students.

This is extremely concerning for several reasons. Firstly, it is a grave violation of moral and ethical boundaries. Since animals are incapable of giving consent, any sexual act is inherently abusive and exploitative. Furthermore, because the anatomy of dogs is not built to endure such assault, the insertion of fingers can cause severe physical harm, such as a rupture of the vestibule.

The act also raises significant concerns about the safety of women on the PEC campus. While the college has reportedly terminated the perpetrator's employment, it is alarming that no legal action has been initiated. This lack of legal accountability not only undermines the severity of the incident but also poses a potential threat to the campus community. Immediate measures must be taken to ensure the safety and well-being of all students and staff. It is crucial that authorities register an FIR and investigate this matter thoroughly to prevent any future abuse of animals or humans on the campus.

**Research shows that people who commit acts of cruelty to animals are often repeat offenders who move on to hurting other animals, including humans. For example, Ameerul Islam, convicted of raping and murdering a Kerala law student, had a history of raping and killing dogs and goats. A study published in the *Journal of Emotional Abuse* found that 71% of abused women with companion animals who sought shelter at a safe home confirmed that their partner had threatened, injured, or killed animals. And a study published in the *Forensic Research & Criminology International Journal* stated, "Those who engage in animal cruelty were [three] times more likely to commit other crimes, including murder, rape, robbery, assault, harassment, threats, and drug/substance abuse."**

This incident was reported by Ms Meenakshi Malik, founder of animal welfare group and shelter Rab De Jeev, to the station house officer of Sector 12 Police Station and the college management seeking immediate action against Mohan. Her formal complaint to the police is documented in **Annexure 2**. The online acknowledgment

of her complaint is included as **Annexure 3**, and the college's official order suspending Mohan from his duties at the Himalaya Hostel is attached as **Annexure 4**.

An e-mail complaint was sent on 16 July to the superintendent of police, Chandigarh, which is attached as **Annexure 5**.

On 30 July, the AWBI issued a letter attached as **Annexure 6** to the deputy commissioner and joint director of animal husbandry in Chandigarh, urging them to initiate an inquiry and take strict legal action against the offender involved under relevant sections of The Prevention of Cruelty to Animals (PCA) Act, 1960, and the Bharatiya Nyaya Sanhita (BNS), 2023. The AWBI also requested that a report on the action taken be submitted within seven days of the letter's issuance.

The killing or maiming of any animal is a grave and serious offence per Section 325 of the BNS, 2023, which makes the act of killing, poisoning, maiming, or rendering useless of any animal punishable with imprisonment for a term that may extend to five years, a fine, or both. Attempting to commit a cognizable offence is punishable under Section 62 of BNS. The act of repeatedly fingering the dog's vagina could be considered as an offence of attempting to maim the dog since the insertion of fingers can cause severe physical harm, such as a rupture of the vestibule.

Also, Section 296(a) of the BNS states that whoever, to the annoyance of others, does any obscene act in any public place shall be punished with imprisonment for a term which may extend to three months, a fine, or both.

Furthermore, Section 11(1) of the PCA Act, 1960, defines acts that constitute cruelty to animals and makes the same punishable under the law. Section 11(1)(a) prohibits the beating, kicking, torturing or treating of any animal in a manner so as to subject them to unnecessary pain and suffering.

I also bring to your attention the judgement dated 7 May 2014 passed by the Hon'ble Supreme Court of India in SLP(C) No 11686 of 2007, titled *Animal Welfare Board of India v A Nagaraja and Ors*, wherein the court held that it's the duty of the government to enforce the PCA Act, 1960, and if the provisions of the act and the directions and declarations of the Supreme Court are not properly and effectively complied with, the government should see that disciplinary action is taken against erring officers so that the object and purpose of the act can be achieved.

This incident has sparked widespread outrage and concern, showing the urgent need for stringent measures to protect animals and ensure that acts of cruelty are met with appropriate legal and institutional responses. I appeal to you to recognise the severity of the individual's attempt to maim and sexually abuse the dog and take immediate action by passing directions to immediately register our complaint under sections 296(a) and 62 read with 325 of the BNS, 2023, and Section 11(1) of the PCA Act, 1960. It is imperative that an FIR be registered without delay to address this egregious act of cruelty considering the alarming and dangerous threat this individual poses to women and other students and staff on campus or otherwise.

Should you have any questions, I can be reached on 7045922028 or at [AsharM@petaindia.org](mailto:AsharM@petaindia.org).

Sincerely,

Meet Ashar  
Cruelty Case Division Legal Advisor and Manager, PETA India  
Lawyer and Animal Rights Advocate  
Honorary Animal Welfare Representative, AWBI – Government of India