
LEGAL NOTICE: Private Complaint about lack of UCoC and ToU mechanism at English Wikikpedia

Sarbajit Roy <sroy.mb@gmail.com>

Mon, Dec 9, 2024 at 1:26 PM

To: "legal@wikimedia.org" <legal@wikimedia.org>

Cc: u4c@lists.wikimedia.org, namedefend@gmail.com, Rajinder Dalvi <rajinder.dalvi@gmail.com>, ca@wikimedia.org, toby.namedefend@cyberlawpractice.com



To:
Stephen LaPorte
General Counsel
Wikimedia Foundation

9 December, 2024

Sir

LEGAL NOTICE / PRESS RELEASE

Please see the appended emails exchanged between our law firm and yourselves. Despite the passage of 7 business days your specialised internal enforcement team has not reverted despite their assurance to do so.

We, at Hindu Raksha Dal, are not prepared to wait indefinitely for your "volunteers" to take their own sweet time to take up our matters. We shall not tolerate for a moment longer the lies and defamations about us being spread by your registered users from the social media pages of your various websites and in different languages including Russian language.

Kindly either delete all references to the following entities from all your websites **within 5 working days**, or else within the same time period provide us the particulars of your Resident Grievance Officer for India who shall process our complaints under India's Intermediary/Digital Media

law(s) against the following users whose details for service of summons may kindly be provided to us by yourselves without delay.

Entities under Hindustan Republican Army whose names and other related comments/discussions and articles are to be expunged completely from every publicly accessible WMF computer resource.

1. Hindu Raksha Dal
2. Hindu News
3. India Against Corruption
4. Hindustan Republican Association

Your **Registered Users** whose particulars are being requested by us for their prosecution

1. User:Liz (English Wikipedia administrator)
2. User:Robertsy (English Wikipedia administrator)
3. User:ZZuuzz (English Wikipedia administrator)
4. User:Ratnahastin (English Wikipedia registered user, formerly known as User:Sikandar khan67)
5. User:Singora (English Wikipedia registered user, blocked as a confirmed sockmaster, currently active under aliases such as User#4, User:HeLaJackson, User:DrMees, and User:MalluMalleus, as confirmed by administrator User:Drmies using Checkuser tools)

Should we not hear from you within 5 working days agreeing to the above courteous and legal course suggested, I am instructed by my Chief Organiser, Dr. R S Dalvi to communicate that it shall be open thereafter to the cadres of Hindu Raksha Dal / Hindustan Republican Army etc. to individually take such direct actions as they seem fit against your employees (including your employees at your proxy organisation "The Centre for Internet & Security"), local chapter members ie local WMF fund grantees whenever they are found to be in India, for the insults being heaped on Hindustan eco-system organisations and members from your websites. **NB:** Dr. Dalvi had already sent a list of a few such employees to you earlier from his own email ID.

A copy of this notice will be posted on the Hindu Raksha Dal website <<https://www.hindurakshadal.org/>> under the Press Releases section so you can confirm its authenticity and our motivations.

yours sincerely

sd/-

(Er. Sarbajit Roy)

for Hindu Raksha Dal / India Against Corruption

Units of Hindustan Republican Army (estd. 1924)

On 2024-12-01 14:42, u4c-bounces@lists.wikimedia.org wrote:

- > Your mail to 'u4c@lists.wikimedia.org' with the subject
- >
- > Private Complaint about lack of UCoC and ToU mechanism at English Wikipedia
- >
- > Is being held until the list moderator can review it for approval.
- >
- > The message is being held because:
- >
- > The message is not from a list member
- >
- > Either the message will get posted to the list, or you will receive
- > notification of the moderator's decision.

On Sun, Dec 1, 2024 at 2:42 PM <toby.namedefend@cyberlawpractice.com> wrote:

To:
The Universal Code of Conduct Enforcement Committee
Wikimedia Foundation Inc.

BY EMAIL

URGENT

Date: December 1, 2024

Dear Committee Members,

We represent the **Hindu Raksha Dal**, a private organization affiliated with the **Hindu Samaj of India** (established in 1849), a well-known and historic association of Hindu religionists in India.

We have been authorized by the Chief Organizer, Dr. Rajendra Singh Dalvi (residing in Germany), and Organizer, Dr. Sarbajit Roy (residing in India), to submit this formal complaint via email. This communication is also cc'ed to them and other relevant Wikimedia.org email addresses.

This complaint aims to bring to the attention of the Global UCoC Enforcement Committee several violations of the Universal Code of Conduct (UCoC) by administrators, checkusers, and registered users of the English Wikipedia project. The specific violations include:

1. **Inadequate Local Self-Governance:** The inability to enforce the UCoC effectively.
2. **Conflicting Local Decisions:** Consistent decisions that contradict the UCoC.
3. **Non-Enforcement of UCoC:** Refusal of local governance structures and teams to enforce the UCoC.
4. **Resource and Will Deficiency:** A lack of resources or willingness to address issues preventing adequate enforcement of the UCoC through local self-governance.

These violations are particularly concerning in instances involving impersonation, sockpuppetry, and threats of physical violence against WMF employees, which our principals have encountered recently.

Primary Targets of the Complaint:

1. User:Liz (English Wikipedia administrator)
2. User:Robertsky (English Wikipedia administrator)
3. User:ZZuuzz (English Wikipedia administrator)
4. User:Ratnahastin (English Wikipedia registered user)
5. User:Singora (English Wikipedia registered user, blocked as a confirmed sockmaster, currently active under aliases such as User#4, User:HeLaJackson, User:DrMees, and User:MalluMalleus, as confirmed by administrator User:Drmies using Checkuser tools)

Additionally, other registered accounts of the Wikimedia Foundation Inc. have been used to systematically defame and libel our principals from Wikimedia computer resources during 2024.

Our clients' cause of action arises from the deliberate blocking of their authorized agents' accounts. When agents using the newly created role account "Kpftwqj23" attempted to open a Sockpuppet investigation into the activities of User#4 and User#5, they were promptly blocked by User#3, and the SPI request was reverted. Our principals assert that User#3 acted in bad faith, as an agent of the Wikimedia Foundation, due to a history of conflict with our principals. Consequently, no investigation into the complaints of UCoC and ToU violations lodged by our principals took place.

Relevant Link: https://en.wikipedia.org/w/index.php?title=Wikipedia_talk:Sockpuppet_investigations/Ratnahastin&oldid=1260468163

Subsequently, another agent created the role account "Tshwana" to inquire about the enforcement mechanisms for UCoC and ToU contraventions on English Wikipedia. This was posted at WP:TEA (URL: https://en.wikipedia.org/w/index.php?title=Wikipedia:Teahouse&oldid=1260509793#Local_enforcement_mechanism_for_UCoC_and_ToU_by_strangers).

The agent was promptly blocked by User#3 and User#2 and their talk page access disconnected. Our principals assert that all this was also done in bad faith by these WMF administrators, to allow continued defamation of our principals using Wikimedia's resources.

As a result, despite many good faith attempts to engage constructively and civilly, no action was taken under UCoC or ToU on that local project regarding our principal's grievances such as harassment by impersonation, trolling, doxing, hounding, libel, sockpuppetry, and issuing physical threats of violence etc..

It is widely known that our principals have been petitioning the Government of India to block Wikimedia Foundation websites for anti-national activities that undermine India's sovereignty, unity, and integrity. Our principals have numerous findings from senior officers of the Government of India validating their complaints, including allegations of child pornography published on WMF websites. Recently, the Supreme Court of India took cognizance of our principals' complaint to Government and directed the Wikimedia Foundation to stop publishing the name and photographs of a rape/murder victim in Kolkata during 2024.

Legal notices from the Government of India, duly served on WMF by the Indian Embassy in the USA, for complaints initiated by our principals, have been routinely ignored. Furthermore, the WMF consistently refuses to comply with India's Intermediary and Digital Media laws by appointing a Resident Grievance Officer for Indian complainants like our principals.

Our principals are prepared to present substantial evidence showing bad faith by the aforementioned users before the committee should our complaint be accepted. Given the urgency of continuous and ongoing defamation from WMF's computer resources, we request you acknowledge receipt of this email within 36 hours (as per Indian law) and indicate your acceptance or refusal to take up this matter. Our principals expect the case to be resolved expeditiously within 14 days and not unduly prolonged.

Alternatively, please indicate any other remedies available to our principals, including whether WMF has appointed a Resident Grievance Officer for India.

Sincerely,

Toby Dollmann

Senior Reputation and Cyber Law Specialist
For Name Defend Services @ Cyber Law Practice
<toby.namedefend@cyberlawpractice.com>
<namedefend@gmail.com>