

**BY EMAIL/ RPAD**

**DATE:** October 08, 2024

To,  
Mr. Bharat Nagpal,  
Founder and Business Head,  
iGyaan Networks  
First Floor, C-164, Defence Colony,  
South Delhi, New Delhi – 110024, India  
Email: [bn@iGyaan.in](mailto:bn@iGyaan.in) ; [info@iGyaan.in](mailto:info@iGyaan.in)

**Subject:** Legal Notice to Mr. Bharat Nagpal on behalf of Social Current Advertising LLP and its Co-Founder, Mr. Rahul Ghosh, to cease-and-desist and takedown the defamatory video uploaded on YouTube dated 05.10.2024 and uploaded on other social media platforms or online transmission/ communication medium

We are writing this legal notice on behalf of and under the instructions of our clients, Social Current Advertising LLP and its Co-Founder Mr. Rahul Ghosh (hereinafter “**Clients**”), as under:

1. The present legal notice is being sent to you, Mr. Bharat Nagpal (hereinafter “**Noticee**”), acting in the capacity of Founder, Business Head, Chief Editor of iGyaan Networks and owner of YouTube Channel – “iGyaan” with about 10.6 lakh subscribers.
2. To the utter shock and dismay of our Clients, it has come to their knowledge that the Noticee has uploaded a false, misleading and defamatory video on (hereinafter, collectively referred to as “**Impugned Video**”) your afore-mentioned YouTube channel on 05.10.2024 with the title “*The Biggest Scam on YouTube #TechScam* 2024” available at <https://www.youtube.com/watch?v=9OVKU4upuHA>.

3. It has come to the knowledge of our Clients that you have further shared the link to this video on your Instagram page titled “*iGyaan | Technology & Gadgets Reviews*” on 05.10.2024 available at “<https://www.instagram.com/reel/DAUgZnSthl/?igsh=OHk3bTJ0YXlrZWUz>” and your twitter account with the user handle “@*igyaan*” on 05.10.2024 available at “<https://x.com/igyaan/status/1842438236964012382?s=46&t=W7r5xb5l37EFxG16LFX5A>”.
4. The present legal notice pertains to the legal injury caused to our Clients due to the false, incorrect, misleading and defamatory statements as well as allegations made by you in the Impugned Video against our Clients which has tarnished their reputation.
5. As you must be aware, Social Current Advertising LLP is a talent management and influencer marketing agency established in July 2022 and governed by the laws of India. Mr. Rahul Ghosh has a well-respected and reputed name in the PR and influencer marketing industry with a devoted experience of more than ten years in the industry. He is the Co-Founder of Social Current Advertising LLP. Mr. Rahul Ghosh is a law-abiding citizen with a proven track of work record in the PR and influencer marketing industry. Our Clients work with several content creators across the country that cater to different markets and regions across India, covering and curating content in more than ten (10) languages. Our Clients, *inter alia*, help the creators with ideation, seeking technology-based knowledge and information, seeking help from allied platforms, among others. They also invest in gadgets ranging from high to low price range, to help all the budding creators cover as many tech-products as possible and give them access to wide array of gadgets/ products that may not be available/ accessible to them. Mr. Rahul Ghosh is among the most respected name in the industry built through hard work, resilience and ethical considerations. The Impugned Video is nothing but an illegal attempt to malign the public image and reputation of our Clients in the industry.
6. It is evident from the Impugned Video that its entire premise of is unverified, admittedly *hearsay*, maligns the public image and reputation of our Clients. You have no proof with respect to any of the averments made in your video against our

Clients. The contents of the said Impugned Video are not only blatantly false and misleading but the same are derogatory and aimed at hurting the well-established reputation and goodwill of our Clients in the PR and influencer marketing industry.

7. The Impugned Video is a blatant lie, and it is shocking to note that you have made numerous allegations against our Clients which have no basis in facts or law. You have irresponsibly and loosely used the word “scam” in your video, imputing them on our Clients. You are put to notice that the entire premise of your video is unverified, admittedly *hearsay*, speculative, and made to intentionally harm the reputation of our Clients. The Impugned Video also irresponsibly misleads the public at large, as evident from the content of the Impugned Video, wherein,
  - a. Words like “ONE BIG SCAM \*alleged” at timestamp 00:43 is used.
  - b. At timestamp 1:09 in the Disclaimer, it has been mentioned that “*None of these reports or the contents of the email have been independently verified by iGyaan*”
8. You have, *inter alia*, made the following false, malicious and defamatory allegations (“**Defamatory Content**”) against our Clients (which you have no independent knowledge of and are aware to be untrue) and published them on online social media platforms (*inter alia*, YouTube, Instagram, Twitter), which is accessible to the general public at large, some of which are iterated below: -
  - a. At timestamp 00:40 – “*ek aisa scam jo puri tech industry ko control kr rha hai*”
  - b. At timestamp 00:49 – “*paanch aise log jo iss puri chiz ke centre mein hai*”
  - c. At timestamp 00:59 – “*iss video mein hum inhi paanch logon ke baare mein baat krenge which are a part of influencer agencies*”
  - d. At timestamp 1:21 - 1:30 – “*bhot saare tech creators aise hai jo aapse constantly jhoot bol rhe hai*” ..... “*inn sabke peeche mastermind sirf 4 ya 5 log hai*”

- e. At timestamp 1:40 – 2:06 - “*ye pura scam bhot hi serious hai*”..... “*ye puri chiz sirf 4 steps mein orchestrate ki jaati hai aur iske peeche sirf paanch log hai*”..... “*Govind, Naim, Rahul, Tanay, Neel*”..... “*Momentum, IPLIX, Social Sauce, Social Current, Look who’s talking*”
- f. At timestamp 2:28 – “*agar humare saath kaam nhi kroge toh naa aapko business aayega, but hum aapko blacklist bhi kara denge, aur editorially bhi aapko devices aane band hojaenge.....*”
- g. At timestamp 3:05 – “*on the flip side agar brand agree nhi krta toh brand ko bolte hai ki agar app humare saath kaam nhi krenge toh ye 40-50 content creator kaam krte hai ye appke products ke baare mein negative reviews likhenge..... brand ko bhi strongarm kara jaa rha hai*”
- h. At timestamp 3:22 – “*brand manager ko hi apne pocket mein krlo.....usko kickbacks offer karo, usko paise offer karo, usko business krne ka ek differnet tarika btao... ..*”
- i. At timestamp 6:30 – “*inn 40-50 creator ko hum artificially boost krenge, inki vidos pe views dalwaenge...like dalwaenge...*”
- j. At timestamp 6:43 – “*jo creator humare saath kaam nhi krta unke comments bhi hum control krte hai..unke videos pe negative comment, unke appearance pe comment,...kaam krne ke tarike pe comments....ye puri market ko manipulate krte hai....unki content ko karab krte hai*”
- k. At timestamp 7:09 – “*devices apne creator ko 15 se 20 din pehle hej diye jaate hai launch date se.....this is free market manipulation*”
- l. At timestamp 14:13 – “*aur creators ko pta hona chahiye...ki who kiske saath kaam kr rhe hai...*”
- m. At timestamp 13:46, 15:35, 14:20 – You have shown contents from an unverified email, possibly by a motivated individual posing as a whistleblower, and emphasised on these contents which *per se* are slanderous and defamatory.

9. You have also made vague claims like our Clients is engaged in brand control, blacklisting, setting launch dates etc. without having any basis. It is brought to your kind attention that our Clients are not even empanelled by any of the brands and making such statements shows your intention to catch user attention on social media at the cost of reputation of our Clients. As you must be aware, the claims made by you in the Impugned Video are speculative and without any verification of any fact whatsoever.
10. You are put to notice that none of the above statements made and published by you are correct. The same are without any verifiable basis and have been published to address some ulterior motives that you may have against our Clients. The aforesaid conduct defames our Clients and also adversely affects our Clients' business by *inter alia* attacking the marketing agency, associated brands and content creators. It is also clear that by the Impugned Video, including by reference to release further parts on this unverified, concocted, distorted and false report, you are threatening to defame our Clients further and continue your illegal conduct.
11. It is unfortunate that you have published such defamatory content against our Clients without undertaking any fact-checking exercise or consulting our Clients in a proper and diligent manner, though being yourself associated with one vertical of the industry.
12. It is clear that your publication of the Impugned Video in the garb of exposing an 'alleged' scam, which you have not admittedly verified, is only to cash-on the reputation of our Clients. Your intent is also to mislead our Clients' customers and make them break their long-standing associations and reap undue benefits out of it. You may note that Social Current operates within the laws of the country and is a tax paying legal entity, and stating its operation as "scam" is callous, mala fide completely irresponsible. You have vaguely attributed words like "monopoly" and "oligopoly" to our Clients without understanding the legal meaning of the terms or the implication of the same on our Client.

13. Our Clients have suffered legal injury and an irreparable harm in terms of reputation in the market and are losing out on business opportunities due to your conduct. You have made slanderous and false statement against our Clients on a social media platform (available to the public at large) and defamed the reputation and brand image of our Clients, which has caused grave injury to the reputation of our Clients.
14. It is noteworthy that any loss of our Clients existing or potential customers results in a cyclical harm to its well-established reputation and puts a heavy financial strain on our Clients who are suddenly incurring reputational and monetary losses as a result thereof, all of which are attributable to your actions. The spreading, sharing, re-sharing and publication of false information relating to our Clients or their business by you, has caused irreparable injury and loss of reputation to our Clients. Our Clients have suffered immense prejudice, loss of goodwill and reputation in the industry in a very short span of time.
15. That, any financial losses due to your illegal conduct to defame our Clients will be solely attributable to your actions and all of which is liable to be compensated by you. Our Clients will be entitled to take appropriate remedies before the Civil Courts. It is pertinent to mention that your conduct also amounts to criminal defamation punishable under section 356 of the Bharatiya Nyaya Sanhita, 2023 with maximum punishment up to 2 years along with the fine.
16. In view of the above, you, Mr. Bharat Nagpal and/or any other person acting on your behalf are called upon to:
  - a. Immediately cease and desist from posting, spreading, sharing, re-sharing, communicating, transmitting or publishing the Impugned Video on any social media platform, online transmission/ communication medium and/or by word of mouth any false and defamatory information regarding our Clients and its business;
  - b. Take down the Impugned Video and all such defamatory information(s) or content(s) which have been already published on social media platforms such as YouTube, Instagram, Twitter, etc.;



- c. Immediately cease and desist from posting, spreading, sharing, re-sharing, communicating, transmitting, or publishing any more or other videos / Defamatory Content pertaining to our Clients (as indicated in the Impugned Video); and
  - d. Issue an unconditional public apology in writing to our Clients for your illegal acts.
- 17. You are directed to confirm the above to our Clients immediately. Any failure to do the above immediately and in case within a maximum period of twenty-four (24) hours from receipt of this Legal Notice, would further entitle our Clients to seek all appropriate remedies under law.
- 18. Please note that your callous and irresponsible actions have caused significant legal injury to our Clients, and our Clients shall not hesitate to take any further action if you fail to comply with the legal notice. This includes commencing appropriate civil case before the appropriate court of law holding you responsible for the reputational harm, monetary damages, costs and consequences thereof and seeking take down of all the online content posted by you against. Further, our Clients shall also be entitled to file appropriate criminal case for defamation under the Bharatiya Nyaya Sanhita, 2023 against you, holding you and/or person(s) acting on your behalf liable.
- 19. Our Clients reserve their rights to claim you and/or person(s) acting on your behalf, all such amounts of loss suffered, attributable directly or indirectly to your actions, acting individually and/or in the capacity of Founder, Business Head, Chief Editor of iGyann Networks and the owner of the YouTube channel, Instagram Page and Twitter Account mentioned herein above.
- 20. This Notice is without prejudice to any of the rights and remedies that our Clients have in law and equity.
- 21. We are retaining a copy of this legal notice in our office for further necessary action.

Yours sincerely,



Abir Roy,  
Advocate,  
On behalf of Sarvada Legal  
C-564, Defence Colony,  
New Delhi- 110024  
E: [abir@sarvada.co.in](mailto:abir@sarvada.co.in)