

54
IN THE COURT OF THE HON'BLE IV ADDITIONAL CHIEF
METROPOLITAN MAGISTRATE AT HYDERABAD
Judicial

Complaint No. of 2025

Between:

A. Srilatha D/o.A.Nagabushanam
Age 47 years, Occ: Ex.Corporator
R/o.H.No.12-13-829/2/2,
St.No.1, Shirdi Sainagar Colony,
Tarnaka, Secunderabad.

...Complainant

And

1 Kumbham Shiva Kumar Reddy

S/o.kumbham Pulla Reddy

Age.61yrs

Vesella meadows,opp;Taramathi Baradari

.ramdev guda,Ibrahim bagh,hyd 500031,

Ph.no:8897040606

2.Smt.Chittem Parnika reddy

w/o Chintalapani Vishwajith Reddy

Age 32 years

H.NO-1-5-33/E, Sai vijay colony

,opp,SP Office,Narayanpet

509210

9391330729

3.Bomma Mahesh kumar Goud MLC

s/o Bomma Gangadhar Goud

A-sib



age 59yrs

Telangana Pradesh Congress

committee President

Gandhi Bhavan congress party office

,nampally 500001

(4) Ms. Meenakshi Natarajan

Age 52yrs

Aicc incharge of Telangana state

Gandhi Bhavan ,congress party office

,nampally 500001

(5) Vakiti Srihari Minister

S/o Vakiti Narsimhulu, Age :52 yrs

Minister for Animal husbandry, Diary development

and fisheries ,sports abd youth affairs.

Minister quarters, no 1 Anand Banjara colony

,Banjara hills,Hyderabad.

(6) K. Prashanth Reddy

s/o late K. Veera reddy

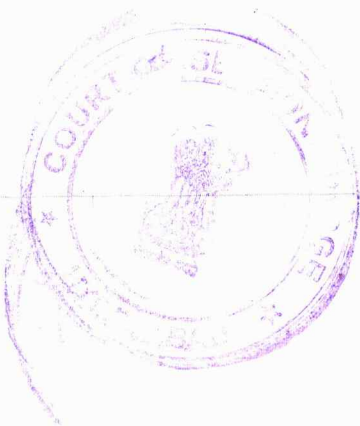
age ;50 yrs

District congress committee president

Narayanpet Dist

Theleru ,Marikal Mandal , Narayanpet ,509210

(7) Chittem Abhijay Reddy



S/o Late Chittem Venkateshwar Reddy
Age 25 Years, Occ : PCC Member,
R/O. Vesella meadows, Opp :
Taramathi Baradari, Ramdevguda,
Ibrahimbagh, Hyderabad- 500031.
9696968619.

...Accused

COMPLAINT UNDER SECTION 223 OF BNSS

Respectfully sheweth,

1. Nature of Offence : 356,61,45,46, 35³⁵¹⁽²⁾~~(1)~~ (2),3(5) of 79 of
BNS Act .
2. Date of Offence : 11-5-2025
3. Place of Offence : At My house With in Limits Of
Osmania University P.S.
4. Name of police station : Osmania University
5. List of witness : 1. Complainant herself
Any other witness will be
produced at the time of trial.
6. List of documents : As the list enclosed.

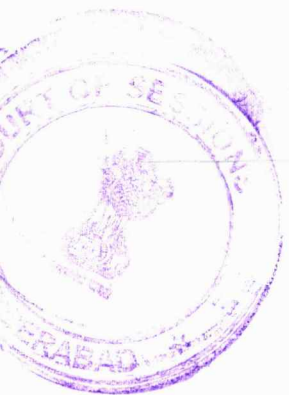
Brief facts of the case:

1. The complainant submits that she is a highly educated law abiding citizen of India and has full faith in the law administration system. That the complainant by way of her endeavours and bonafide actions has developed the credibility and good will among her social circle.



2. The complainant submits that she joined politics and became Corporator from 2002 to 2007 of Tarnaka division from TDP party two times standing committee member and twice ward committee chairperson.
3. The complainant submits that from 2007 to 2010 she was state Mohila secretary in TDP and State Joint Secretary.
4. The complainant submits that she had given complaint against Kumbham Shiva Kumar Reddy for physically molesting and giving life threats to her which was culminated into an FIR against Kumbham Shiva Kumar Reddy under Section 64 and 351 of BNS in panjagutta police station on 07.05.2022 and other FIR bearing No.144/2023 under section 64, 351, 74 (A) & 3(5) of BNS and section 8(4)(E) at Cubbon Park police station registered by police officials on 28.06.2023, protest petition filed and is pending before the Hon'ble Court 41st court at Bangalore, Kartanaka and another case FIR No.723/2023 under section 318(4), 329(3), 329(4), 336(1) BNS is at protest petition filed before the Hon'ble court IVth Addl. Chief Metropolitan Magistrate, Hyderabad.

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5. That he is from the Reddy community and I am a BC lady so my case was not taking into consideration by which I am suffering in my life socially as I have to face insult, they are defaming me and don't let me to raise my voice against the accused.

6. It is submitted that the complainant has given several representations to the congress party higher ups but no action has been taken by the party against Kumbham Shiva Kumar Reddy and inspite of his involvement in serious criminal cases he is enjoying the political power and on the other hand as I belongs to backward community and victim at his hands, the complaint is put out of the party activities.

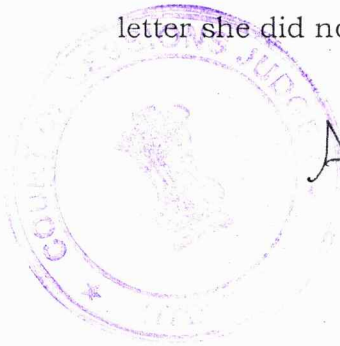
7. The complainant submits that Kumbham Shiva Kumar Reddy has tendered his registration for the post of District Congress Committee President of Narayanpet as he is involved in criminal cases including 64 of BNS cases. After protest by the social activities at Panjagutta police station in demand to arrest him August 29, 2022.

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8. It is submitted that the complainant belongs to BC community another B.C. leader by name Vakiti Srihari was appointed as District congress committee President of Naryanapet on 22.09.2022, it is nothing but to suppress my case issue and they try showed they encourage BC leaders. After DCC he becomes MLA and minister of animal husbandry now. At that time when he was appointed as DCC President but he had not taken any disciplinary action against Kumbham Shiva Kumar Reddy as he happen to be close friend, and he calls as BAVA . On 29th July 2025 Vakiti Srihari on stage he had taken the name of Shiva Kumar Reddy and stated that if no body takes my Bava name I will take his name. Iam Herewith submitting the Video for your Honours kind perusal.

9. The complainant submits that she had given several representations against Shiva Kumar Reddy to take disciplinary action, but as there was no response action. I approached AICC member Mr. Spencerlal had also demanded on 10th May 2025 to take disciplinary action agaist Shiva Kumar Reddy. Then AICC incharge of Telangana Meenakshi Natarajan had told to complaint that he is already suspended from the party, but when asked for letter she did not respond for the reason best known to her.



10. That he get support from the party and also became election counting agent despite his bail was rejected, they were troubling me a lot so that I would commit suicide or to draw back my case.

11. The complainant submits that Parnika Reddy MLA of Narayanpet had officially shared the stage with Accused Kumbham Shiva Kumar on different occasions. Inspite of knowing that his two anticipatory bail are dismissed and he is facing serving criminal cases in the different courts. She won the election by defaming the complainant stating that the case had filed in the instigation of opposition other party BRS which is not true, and which is liable u/s 356/61/45/46 of BNS. As the complaint I had already given complaint to SP Narayanpet regarding this issue on 22.10.2023 I also given a complaint to election commission but no action has been taken so far.

12. It is submitted that I also informed previous AICC incharge madam Deepdas Munshi mam. She said she would definitely take action against Kumbham Shiva Kumar Reddy. She called Parnika Reddy and Shivakumar Reddy to Gandhi Bhavan and that time TPCC Mahesh Kumar Goud was also present he also said along

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with these two people it is fake case like this they defamed me in several ways.

13. It is Prashanth Reddy DCC President of Naryanpet at Present is also in collusion with Shiva Kumar Reddy and hence not taking any action till date for the reason best known to him, , and which is liable u/s 45/46/61 of BNS.

14. It is submitted that complainant had given representation to Telangana C.M. dated on 10.09.2024 and Deputy C.M. requesting him to take disciplinary action against Shiva Kumar Reddy including his arrest. The complainant states that CMO has forwarded the complaint to SP NARAYANPET the representation Narayanpet vide Ref.No.8622/gen/GP/2024 dated.27.09.2024 but no action has been initiated till date.

15. The complaint submits that she is the victim at the hands of Kumbham Shiva Kumar Reddy she is kept away from congress programs which is weaking the struggle of the victim for justice. Mr.B.Mahesh Goud at the time of incident in the 2022, he was working president. He gave a press statement and said he will form

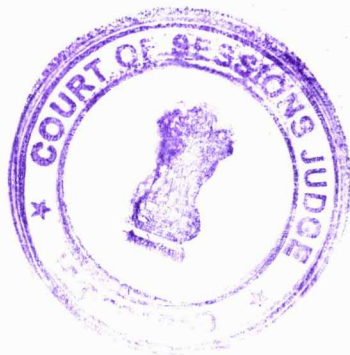


a committee to know the fact and take action against K.Shivakumar Reddy till date no action.

16. The complainant submits that the high command of congress party have not taken any disciplinary action even though under Article 19 (C)(4) of the Indian National Congress Constitution. As per the party Constitution Kumbham Shiva Kumar Reddy who has violated the discipline mentioned in the page no.58 under (a) should be expelled from the party members and thus disqualifying him from all the rest of the party. Moreover whenever complaint asked Mahesh Goud he said at that time Pradesh congress committee president Mr.Revanthreddy told him not to intervene in this issue .i will take care.

17. The complainant submits that she often threatening by the party officials due to which she is scared. Her struggle for justice is being weakened from visions and outside the organization due to the influence of the Shiva Kumar Reddy. Shiva Kumar Reddy is belongs to Reddy community and her voice is being suppressed. Due to these all incidents which effected in her life in social life. I Joined lions club international in 2019. I was district chairperson for

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disaster relief while I gave complaint to Chief Minister and Deputy chairperson regarding Shiva Kumar Reddy to take action. Later I was removed from lions club without reason and not following any bylaws, I filed complaint in police station, Ramgopalpet police station and even the team no response later same complaint I filed private complaint in court of the Hon'ble XXII CHIEF Metropolitan Magistrate. The Hon'ble court has taken cognizance under Sections 356(2), 351(2), 61(2), 79, 35 just because of accused K. Shiva Kumar Reddy is unable to breathe.

18. The complainant submits that Kumbham Shiva Kumar Reddy is habituated criminal having influence with top congress leaders including his neice Parnika Reddy is present MLA of Narayanpet constituency by using his political influence, his visiting his political influence his is able to succeed in close the above cases, but I have filed the protest petitions and these are pending before court, there is ample evidences to prove the guilt of the accused Shiva Kumar Reddy but he is escaping from the law of land. The complainant submits that for the last several years she is struggling for justice.

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19. The complainant submits that she had given several complaints to the police, but no action has been taken my home also was burnt and they are threatening me either to withdraw the case or commit suicide, as there is no option I am approaching this Hon'ble court to do justice to me as a last resort I have lost all hopes except judiciary.

20. The complainant submits that disclosing her name in 64 matter is clearly violating the section 267 BNS 2023 which prohibits to the printing or publishing of the name or another details which discloses the identity of victim of 64 and his follower by name Bhim Prakash also posted Shiva Kumar Reddy letter in facebook to view all the facebook friends. A complaint was raised regarding this issue in police station they filed FIR NO;490/2022 and in charge sheet 6249/2023 they removed Shiva Kumar Reddy and his followers names ,Bhimprakash suri and tinku they all are with Parnika Reddy at the time her elections on also her followers,pictures are added with this petition. Bangalore court has given me protection order 5-1-2024 to Hyderabad commissioner. After order I have given several representations to Chief minister and Hyderabad commissioner later after 10 months ie,28-10-2024 they said they

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can provide protection in Panjagutta limits which is nowhere in the concern limits.

21. The complainant submits that the accused in FIR No.209/2022 namely Kumbham Shiva Kumar Reddy wrote a letter to the president of Telangana Pradesh congress committee by mentioning the victim name in the 64BNS AND 351 BNS case which is clearly violating the women laws

22. The complainant submits that the accused persons are threatening me to withdraw section 64 & 351 of BNS case which is pending before the Hon'ble court or to commit suicide or face dire consequences. The complainant Submit that her house is burnt in the year 2023 by the instigation of Shiva Kumar Reddy. The complainant submits that another case is also pending against shiva kumar Reddy before the Hon'ble Ranga Reddy Court at L.B.Nagar. It is submitted that Bangalore court in FIR No. 144/2023 has given Protection Order on 4-1-2023 and now it is not in force and the protest petition is pending before the 41st Hon'ble Court. The complaint approached the Hon'ble court as there is no option left to her as a last resort.

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23. The complainant submits that she is not having peaceful sleep because of the activities of the Accused persons and her nerves may break down because of their threatening, TPCC President Mahesh Goud is threatening me stating that Hon'ble C.M. Revanth Reddy is angry on me for filing case under section 64 and 351 of BNS against Kumbham Shiva Kumar Reddy. That the accused has caused damage to her image and has tarnished the reputation of the complainant with certain ulterior motives to defame and cause disrepute in the society at large at a public at the time of 2023 elections another follower Prem Kumar Goud resident of Cherlapally threatening the complainant to withdraw the case or else I have to face dire consequences. 24.10.2023 at 2.30 pm call from 6281649142 stating himself as Praveen P.A. to shiva Kumar Reddy to withdraw the case and settle the issue. Budidha Prem Kumar goud his actual number is 9154445942. Raised complaint at Cyber Commissionarate but no action has been taken against the Premkumar goud and shivakumar reddy complaint filed on 30.10.2023.

24. I state that Chittem .Abhijay Reddy is nephew of Accused No.1 is

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Closely associated in all his illegal activities and he is always giving statements through social media by Threatening to withdraw or face consequences and also states that Accused No.1 will come out without any difficulty and also defaming and threatening me before public.

25. The congress party has awarded the post of PCC member to Accused Kumbham Shiva Kumar Reddy nephew .who was never active in political activites just because Shiva Kumar Reddy removed from DCC president as I filed complaint under sections 64 and 351(2)/(3). in 2022 K.Shivakumar Reddy was aspirant of MLA because of case MLA ticket given to Parnika Reddy congress party all time in good terms with Shiva Kumar Reddy and thrown me out of party as Complainant don't have any influence and moreover complainant belongs to backward community. Parnika Reddy won the elections by saying complainant have filed false case against her uncle Shiva Kumar Reddy by the instigation of BRS party complainant no where connected to anyone. Complainant faced a lot of humiliation, defamation by cheating she won the elections they said that this case is honey trap, for extracting money filed this case.Two Anticipatory bails are



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dismissed and he is not on bail till date and he is very much attending all official programs with narayanpet collector ma'am and SP, After elections congress government formed as such Parnika Reddy's mother accused Shiva Kumar Reddy sister Chittem Lakshmi IAS was on leave for 4-5 years appointed in the congress government has first Diary managing director and later now working as AYUSH managing director. Now AICC incharge of Telangana Meenakshi Natarajan has appointed Parnika Reddy as General secretary of TPCC. ON 25-7-2025 Shivakumar Reddy distributed farmers cheques with RDO OF NARAYANPET don't understand with what capacity he has distributed given complaint to collector. The complaintant submits that she is in distress and trauma .The accused has sought to ruin the future prospective that the complainant had the succeeds in her future. The act of the accused has caused valuable damage to the reputation of the complainant and has harmed her reputation and these are made by the accused deliberately and when Spencerlal conducted press meet in Hyderabad for not taking disciplinary action on Kumbham Shiva Kumar which was published in different newspapers on 10th May 2025 and electronic media Shivakumar Reddy called his

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follower Shashikanth on 11th May , 2025 told him that "LANJA KI
CHEPPU CHAMPESTHA CASE LO SILENT UNDAKAPOTHEY."

It is therefore prayed that this Hon'ble court may be pleased to
take cognizance against the accused persons and direct them to pay
compensation amount of Rs.10 Crores and punish them as per law,
and to pass such other order or orders as this Hon'ble court deems fit
and proper in the circumstance of the case, and in the interest of the
justice.

Place: Hyderabad
Date: 20-8-2025.

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COMPLAINANT

