

IN THE HIGH COURT OF DELHI AT NEW DELHI

(EXTRAORDINARY WRIT JURISDICTION)

WRIT PETITION (CIVIL) NO. OF 2015

(IN THE MATTER OF A PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

ANTI CORRUPTION FRONT

PETITIONER

VERSUS

DIRECTOR, CENTRAL BUREAU OF

INVESTIGATION AND OTHERS

RESPONDENTS

WITH

PAPER BOOK

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ADVOCATE FOR THE PETITIONER: SOLICITORSINDIA LAW OFFICES

IN THE HIGH COURT OF DELHI AT NEW DELHI

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WRIT PETITION (CIVIL) NO. OF 2015

(IN THE MATTER OF A PUBLIC INTEREST LITIGATION)

(Public Interest Litigation under Article 226 of the Constitution of India)

IN THE MATTER OF:

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**SOLICITORSINDIA LAW OFFICES
ADVOCATES**

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JANGPURA EXTENSION,
NEW DELHI – 110014
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Dated: 20.01.2015
New Delhi.

IN THE HIGH COURT OF DELHI AT NEW DELHI

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NOTICE OF MOTION

To

DIRECTOR
CENTRAL BUREAU OF INVESTIGATION,
PLOT NO. 5-B, 6TH FLOOR,
CGO COMPLEX,
LODHI ROAD,
NEW DELHI – 110003.

RESPONDENT

Sir,

Please find the enclosed herewith the copy of Public Interest Litigation Under Articles 226 of Constitution of India for the issue of a PIL of mandamus or any other PIL, order or direction to the Respondent No. 1 and Respondent No. 2 to produce the records and explain the actions taken on petitioner's complaint forwarded by the registrar, supreme court of India. The said matter is likely to come up on 19.01.2015 or such other date is convenient to the Registry of the Hon'ble High Court.

Counsel for the Petitioner

**SOLICITORSINDIA LAW OFFICES
ADVOCATES**

J-27B, 3RD FLOOR,
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URGENT APPLICATION

To,

THE REGISTRAR,

HIGH COURT OF DELHI,

AT NEW DELHI.

Sir,

Kindly treat the accompanying petition as an urgent one as per the Delhi High Court Rules.

The ground of urgency is that

It is most humbly prayed.

Petitioner

**SOLICITORSINDIA LAW OFFICES
ADVOCATES**

J-27B, 3RD FLOOR,
JANGPURA EXTENSION,
NEW DELHI – 110014
solicitorsindia@yahoo.com
Phone No. 011-43552666

Dated: 20.01.2015
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RESPONDENTS

ANTI CORRUPTION FRONT
NATIONAL PRESIDENT
25, JHALANI TOOLS MARKET,
BELOW BATA FLYOVER (PNB ATM)
N.I.T. FARIDABAD, HARYANA.

PETITIONER

VERSUS

- PETITIONER

Dated: 20.01.2015

New Delhi.

SYNOPSIS AND LIST OF DATES

The petitioner herein is a registered organization working for the welfare of the society specially to protect the fundamental rights of the general public and by its nomenclature “Anti Corruption Front” it is fighting against corruption. Through the present petition, the Petitioner is seeking kind indulgence of this Hon’ble Court to intervene the ongoing investigation of a celebrity, named Late Mrs. Sunanda Pushkar Tharoor, the deceased wife of Mr. Shashi Tharoor, a Former UN Diplomat and Former Union Minister and presently the Member of Parliament in Lok Sabha. The death was happened in a mysterious circumstance, the body of the deceased carried more than 10 injury marks and the reason for the death was mentioned as poisoning. Even the Investigating Agency found it is a clear case of murder but till date the Investigating Agency is in dark, even a long one year passed after the incident occurred in a five star hotel in the heart of the capital of our country no convincing conclusion is come out with regards to the accused persons who planned and executed the murder.

It is respectfully submitted that the Police which was duty bound to register an FIR and commence an investigation shockingly has not registered the FIR with regard to an incident, which had taken place on 17.01.2014 and the FIR was subsequently registered only on 01.01. 2015, almost after one year that too, after the issue was widely debated in the media. Time and again the Hon'ble Supreme Court as well as various High Courts have clearly laid down the guidelines that on receiving information disclosing commission of a cognizable offence, the police should register an FIR with out any delay. In the present matter the police registered an FIR

almost after 342 days of the occurrence of the crime. The police has brazenly flouted the basic law of the land and ignored various positive guidelines issued to them by this Hon'ble Court as well as the Hon'ble Supreme Court in various judgements. The Police department for the reasons best known to it has chosen to be aloof of law and procedure laid down by the Code of Criminal Procedure and had remained blindfolded in not registering an FIR for the long period. It even more shocking to know that even the learned S.D.M who was in charge as per Sec. 174 Cr.P.C has failed to discharged his duties in the right earnest as no directions have been issued till 01.01. 2015. The Commissioner of Police, is duty bound to explain the reasons for such serious dereliction of duty and latches on the part of his department in not registering an FIR in a case death of a lady within seven years of her marriage in mysterious circumstances.

The Petitioner seeks the indulgence of this Hon'ble Court in the present case mainly on the following grounds:

1. That the Accused are very powerful and influential persons, who have the capacity to influence the senior police officials. The facts of the case indicate that the top police officials were influenced and the accused have succeeded in their efforts by keeping the present case in cold storage for a period of one year. So, the investigation of the case has not been proceeding in the proper direction, if the present investigation is continuing in this manner no truth would come out. Thus, there is no credibility for the ongoing investigation.
2. That there is malafide and bias on the part of the investigation agency so there is no positive and constructive development in the present

case. In such facts and situation, there is cause and reason for the interference of this Hon'ble Court in the ongoing investigation.

3. That by invoking article 226 of the Constitution of India, the extraordinary power of this Hon'ble Court may be excised, since, it is necessary to provide credibility and instil confidence in the investigation in light of the international ramification in the present case. The involvement of foreign nationals is already admitted by the investigation agency and it has international ramification and a co-ordinated effort of the international investigating agencies is required to unearth the truth and the present Investigating Agency with its sloppy and laid back nature is not equipped for this.
4. That the Investigation Agency has not followed the correct procedure under Section 174 of Code of Criminal Procedure. The police in the present case has consumed a miserably long time in the inquest proceedings. The purpose of holding the inquest as per Section 174 Cr. P.C is very limited, it is to ascertain whether the person has committed suicide or has been killed by an animal or by accident or murdered or has died by some other reason raising reasonable suspicion that some other person has committed the offence. The inquest proceedings under the scheme of Code of Criminal Procedure cannot take place of an investigation. The Investigation Agency thus cannot take refuge of the said inquest report to say that based on the observations of the inquest, postmortem and the initial findings, the Investigating Officer did not think it appropriate to register a case of murder. The case in hand clearly depicts the insensitivity of the Delhi Police and its pachydermatous indifference to the suffering of a common man.

5. *That the Investigation Agency till date has not ruled out the reasons for death of the deceased, which includes money laundering and the involvement of Mr.Shashi Tharoor in IPL Kochi franchise controversy. Infact, it was alleged that Mr. Shashi Tharoor just before 18 days from IPL cricket team “[Kochi Tuskers Kerala](#)” bidding, while the deceased was the director of the company M/s. Rendezvous Sports World, misused his ministerial position getting free stake in the said company.*
6. That the accused persons are very powerful and influential person and the same is evident from the fact that Dr. Sudhir Gupta admitted that he was pressured by top officials to show the death of the deceased as a "natural death", though spokespersons of AIIMS namely Mr. Amit Gupta and Mr. Neerja Bhatla had denied the same. However, the Medical Board vide their subsequent opinion have specifically asked the Investigation Officer to provide information pertains to medico legal related to the email exchange between Mr.Shashi Tharoor and Dr.Rajiv Bhasin regarding stipulation of cause of death. Wherein Mr.Shashi Tharoor had tried to establish their speculation regarding the disease and cause of death was LUPUS disease of Smt.Sunanda Pushkar before the medical board with the help and collusion with Dr.Bhasin, Dr.Anil Gupta and Mr. Anil Chatta through Dr.Mishra of AIIMS. Thus, it is sufficient enough to draw an inference that the persons involve in the murder of the deceased are very powerful and influential person and it is very likely that they may not allow the investigation agency to proceed in proper direction.

LIST OF DATES

Year, 2010	The Deceased married to Mr. Shashi Tharoor, the Formal UN Diplomat and Formal Union Minister and presently the Member of Parliament in Lok Sabha. A Company M/s. Rendezvous Sports World had bid for the IPL cricket team known as “Kochi Tuskers Kerala” in the year 2010 while deceased was made a Director of the company. However, before 18 days from IPL bidding, Mr. Shashi Tharoor on 25 February, 2010 allegedly, misused his ministerial position for getting a free stake in the company, and the deceased had acted as a proxy for Mr. Shashi Tharoor. The Deceased was given sweat equity worth Rs.700 million of M/s. Rendezvous Sports World company in year 2010.
16/17.01.2014	The deceased had confessed telephonically to Ms. Nalini Singh, a journalist, at 12.10 am (odd time) just few hours before her death that she had ‘taken over the crimes’ of Mr. Tharoor in the “IPL matter”.
17.01.2014	At about 9 p.m. deceased Smt. <i>Sunanda Pushkar Tharoor</i> was found dead inside the bedroom of suite No. 345, at Hotel Leela Palace, New Delhi. Thereafter police conducted preliminary enquiries, which reveals that the deceased had checked in to the Hotel on 15.01.2014 at 17:48 hours. Accordingly, DD No.33A at 9.30 PM was lodged in the Police Station Sarojini Nagar in this regard. Sh. Alok Sharma, SDM Vasant Vihar, was informed who inspected the place of occurrence and conducted Inquest Proceedings u/s. 176 Cr.P.C. SDM/Vasant Vihar examined

the witnesses and the relatives of deceased and recorded their statements. Director CFSL, Lodhi Road New Delhi, along with team also visited the scene of crime.

18.01.2014 *Post Mortem of the deceased was conducted at AIIMS, New Delhi vide P.M. No. 77/14 by an Autopsy Board of three Forensic Doctors of AIIMS headed by Dr. Sudhir Gupta.*

26.01.2014 There was exchange of emails between Mr. Shashi Tharoor and Dr.Rajiv Bhasin, Noida dated 26.01.2014 and an email dated 12.02.2014 sent by Dr.Anil Gupta (Cooper Health clinic, Dubai, UAE) after death of the deceased, trying to established their speculation about the decease and cause of death as LUPUS.

01.05.2014 *The report from CFSL, Lodhi Road was received. As per the report the presence of Saliva and foreign material was not detected.*

02.07.2014 Dr. Sudhir Gupta, who headed the team of forensic experts that conducted the postmortem had admitted that he was pressured by top officials to show the death of the deceased as a "natural death", he further claimed that he is now being targeted because he did not bow to the pressure and gave a report stating that Sunanda's death was caused by drug poisoning that could be both suicidal or homicidal.

25.08.2014 *The report from FSL, Rohini was also obtained regarding quantitative analysis of chemicals.*

28.08.2014 *Both these reports obtained from CFSL, Lodhi Road and FSL Rohini were sent to Autopsy Board, AIIMS.*

27.09.2014 *The Autopsy Board gave subsequent medical opinion, AIIMS. In subsequent opinion report, the Autopsy Board opined “the cause of death in the case is poisoning”. The Autopsy Board further required that a few of other medico legal points needs to be addressed by IO since the circumstantial information are essential for medical opinion.*

01.10.2014 *In response to the information sought by the Board, photographs of the scene of crime, statements of witnesses and relatives, e mails etc. were provided to the Autopsy Board with a request that the Board members may visit the scene of crime to collect any object/ material from the scene of occurrence which may be of any importance for medical examination and conclusive opinion in the post mortem report, as the scene of occurrence was still preserved.*

05.11.2014 *The Autopsy Board members along with CFSL expert team visited the scene of occurrence and lifted exhibits from there. Seized exhibits were sent to CFSL, Lodhi Road for chemical examination.*

24.12.2014 *The report in regard to the seized exhibits on 05.11.2014 was received and the same was sent to Autopsy Board along with other relevant treatment papers related to the*

deceased on the same day.

- 29.12.2014 *Report from Autopsy board in this matter has been received in which autopsy board has opined that all above medical documents given by Investigation Officer and detailed P.M. Report including HPE conclude that the deceased Smt. Sunanda Pushkar was neither ill nor any disease prior to her death. She was a normal healthy individual. In view of the above analysis the death due to Natural Cause is ruled out in this case. The cause of death in this case is poisoning. The poisoning is through oral route, however injectable route too also can't be ruled out.*
- 01.01.2015 FIR No. 4 of 2015 was lodged at Sarojini Nagar Police Station under Section 302 of India Penal Code for murder of Late Smt. Sunanda Pushkar Tharoor, wife of Shri Shashi Tharoor, resident of 97, Lodhi Estate, New Delhi.
- 14.01.2015 The Delhi Police sources informed to IBN.LIVE that Smt. Sunanda Pushkar's murder case is a open and shut case.
- 20.01.2015 Hence this Writ Petition.

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INVESTIGATION AND OTHERS

RESPONDENTS

WRIT PETITION (PUBLIC INTEREST LITIGATION) UNDER ARTICLE 226 OF CONSTITUTION OF INDIA SEEKING WRIT OF MANDAMUS OR ANY OTHER APPROPRIATE WRIT SEEKING DIRECTIONS TO RESPONDENT NO.1 TO CONDUCT A DETAILED INVESTIGATION AND KIND INDULGENCE OF THIS HON'BLE COURT TO MONITOR AND SUPERVISE THE INVESTIGATION CONDUCTING BY THE RESPONDENT NO. 1 INTO THE FIR NO. 4 OF 2015 LODGED AT SAROJINI NAGAR POLICE STATION.

TO,
THE HON'BLE CHIEF JUSTICE
AND HIS COMPANION JUDGES,
OF DELHI HIGH COURT,
AT NEW DELHI

THE HUMBLE PETITION OF
THE PETITIONER ABOVE
NAMED

MOST RESPECTFULLY SHOWETH:

1. That the present Writ Petition is being filed as Public Interest Litigation, under Article 226 of the Constitution of India, seeking directions to the Respondent No.1 to conduct a detailed investigation and to monitor and supervise the investigation being conducted by

the Respondent No.1 into the FIR No. 4 of 2015 lodged at Sarojini Nagar Police Station on 01.01.2015 under Section 302 of Indian Penal Code for murder of Late Smt. Sunanda Pushkar Tharoor, wife of Shri Shashi Tharoor, resident of 97, Lodhi Estate, New Delhi (hereinafter called and referred to as **deceased**). A true typed copy of the said FIR No. 04/2015 dated 01.01.2015 P.S. Sarojini Nagar, New Delhi is annexed herewith and marked as ANNEXURE P-1 (PAGES TO).

2. That the Petitioner is approaching this Hon'ble Court after gathering information and documents collected from various sources including print media and visual media. The present Petition is filed as part of the aims and objectives of the Petitioner Organisation.
3. The Petitioner is approaching this Hon'ble Court as a representative of the general public. It is further submitted that the Petitioner is aggrieved by the inaction and non-compliance of the procedure laid down under Code of Criminal Procedure and precedent set by the Hon'ble Supreme Court and this Hon'ble Court from time to time.

The petitioner has no personal interest in the present Public Interest Litigation and is guided by general-interests of society at large, and hence has no ulterior motive in filing the present Public Interest Litigation.

4. It is submitted that the Petitioner herein is the National President, Anti Corruption Front, a registered as well as recognized Society, having its registration No. 682, registered with the Registrar of Societies, having its registered office at Shop No.25, Jhalani Tools

Campus, Below Bata Flyover, NIT Faridabad. The petitioner is working for the welfare of the society especially to protect the fundamental rights of the general public and by its nomenclature “Anti Corruption Front” it is fighting against corruption and hence competent to espouse the cause in present PIL and in case costs are imposed by this Hon’ble Court, same shall be paid by petitioner Society.

5. That the Petitioner has no other remedial action except to approach this Hon’ble Court. The Petitioner is approaching this Hon’ble Court for violating the procedure laid down under Code of Criminal Procedure and dictum laid down by this Hon’ble Court and the Hon’ble Supreme Court regarding registration of FIR. Hence, no need to approach any other authority in this regard.
6. That the Petitioner had earlier filed a Public Interest Litigation before the Hon’ble High Court of Himachal Pradesh at Shimla bearing CWP No. 8225 of 2013 with cause title “Anti Corruption Front Vs. Union of India and Others” exposing the scam of land by some influential VIPs of the society and sought direction for constitution of Special Investigation team of officers having high integrity under the supervision of the Hon’ble High Court. Further it is submitted that the Hon’ble High Court was pleased to entertain and consider the said petition filed by the Petitioner and issued notice to the respondents of that case vide Order dated 18.11.2013 and the same is pending for further proceeding.
7. That the Respondent No.1 is the premier Investigating Agency of our country, Respondent No.2 is the Union of India which has

control over the Delhi Police and Respondent No.3 is the present Investigating Agency, who are duty bound to comply the Legal Pronouncements and directions issued by this Hon'ble Court and Hon'ble Supreme Court, which they have miserably failed to and the relief sought is mainly against them, no other relief is sought which would affect the interest of any other person. In the present case Police for the reason better known to them had failed to lodge an FIR for a period almost one year after the mysterious death of a lady. It is the settled law that mere registration of an FIR in every case may not result into arrest of a person accused of the offence. But certainly the police cannot postpone the registration of an FIR where the information received by it clearly discloses commission of a cognizable offence. The police is expected to take fair, impartial and sincere steps whenever any crime is committed as the prime function of the police is to protect the lives of the people and also to maintain the law and order situation to ensure a crime-free society.

8. It is submitted that the insensitivity of the Police in the instant case forces the common man to infer connivance/influence of some influential person or persons over the police. The Police has once again proven worthy of its dubious distinction of being partisan of the power yielding somebodies and has on the way belittled the value of human life.
9. It is submitted that in the peculiar fact and circumstances of the present case it is appropriate that this Hon'ble Court may direct Respondent No.3 to explain as to what action has been initiated against the delinquent officers for their despicable conduct.

10. The relevant legal issues for the kind consideration of this Hon'ble Court are;

- a) Whether it is the duty of the Police to register an FIR under section 154(1) Cr PC and proceed with the investigation in compliance of the decision of this Hon'ble Court and the Hon'ble Supreme Court when it comes across, the death of a lady, within seven years of her marriage in mysterious circumstances with suspicious injury marks on her body?
- b) Is not the SDM bound to direct the registration of FIR while exercising the statutory duty under Section 174 Cr. P.C. in light of the observation of this Hon'ble Court in Radha Vs. State?
- c) Whether the scope of holding inquest under section 174 Cr PC be considered as a substitute to the registering an FIR and the subsequent investigation?

Brief history of the case:

- i. It is submitted that the deceased was an international media figure due to her successful career and the same had gives her name and fame in the society. She was a Indo-Canadian businessperson and the wife of former Indian diplomat and politician Mr. Shashi Tharoor and a co-owner of the India-based Rendezvous Sports World and It is also submitted that the deceased was one of the stake holder in one of the IPL cricket team Kochi Tuskers Kerala.

ii. In the year 2010 she was married to the former Indian diplomat and politician Mr. Shashi Tharoor. It is pertinent to mention that Company M/s. Rendezvous Sports World had bid for the IPL cricket team known as “Kochi Tuskers Kerala” in the year 2010. However, 18 days before the IPL bidding, the deceased was made a Director of the company M/s Rendezvous Sports World, and thereafter Mr. Shashi Tharoor on 25 February, 2010 allegedly, misused his ministerial position for getting a free stake in the company, and the deceased had acted as a proxy for Mr. Shashi Tharoor. It may also be pertinent to state that she was given SWEAT EQUITY worth Rs.700 million of M/s. Rendezvous Sports World company in year 2010. Further, the alleged controversy resulted in the resignation of Mr. Shashi Tharoor from the ministerial post.

iii. That in the year 2014, shortly before her death, deceased had stated to journalist friend that she had taken upon herself "the crimes of her husband" Mr. Shashi Tharoor during IPL controversy. Further, it is also pertinent to mention that as per media reports, shortly before her death the relation had strained between her and her husband.

iv. That on 17.01.2014 at *about 9 p.m. deceased Smt. Sunanda Pushkar Tharoor* was found dead inside the bedroom of suite No. 345, at Hotel Leela Palace. Thereafter police conducted preliminary enquiries, which reveals that the

deceased had checked in to the Hotel on 15.01.2014 at 17:48 hours. Accordingly, DD No.33A at 9.30 PM was lodged in the Police Station Sarojini Nagar in this regard.

- v. That on 18.01.2014 Post Mortem of the deceased was conducted at AIIMS, New Delhi vide P.M. No. 77/14 by an Autopsy Board of three Forensic Doctors at AIIMS. The Autopsy Board opined that the cause of death to the best of their knowledge and belief in the present case is poisoning. The circumstantial evidences are suggestive of alprazolam poisoning. However, in the subsequent Medical Board opinion dated 27.09.2014 vide their PM No. 77/14 that none of the treatment documents of Mrs. Sunanda Pushkar has mentioned prescription of tablet Alprax and the viscera report of the decease was also negative for the presence of Alprazolam. However, it is pertinent to mention that the two used Alprax strips of capacity 15 tablets each were recovered from the crime scene. A true copy of the said subsequent Medical Board opinion vide their PM No. 77/14 dated 27.09.2014 is annexed herewith and marked as **ANNEXURE P-2 (PAGES TO)**. Further it is also pertinent to mention that the various injuries were also found on the body of the decease caused blunt force, simple in nature, non-

contributing to death and are produced in scuffle, except injury number 10 which is an injection mark. Injury number 12 is a teeth bite mark. Moreover, the injuries number 1 to 15 is of various duration ranging from 12 hours to 4 days.

vi. Thereafter on 05.11.2014 the Autopsy Board members along with CFSL expert team visited the scene of occurrence and lifted exhibits from there, seized exhibits were sent to CFSL, Lodhi Road for chemical examination. The report in this regard was received on 24.12.14 and the same was sent to Autopsy Board along with other relevant treatment papers related to the deceased on the same day. Latest report from Autopsy board in this matter has been received on 29.12.14, in which autopsy board has opined that all above medical documents given by I.O and detailed PM report including HPE conclude that the deceased Smt. Sunanda Pushkar was neither ill nor any disease prior to her death. She was a normal healthy individual. Thus, the autopsy board, AIIMS has in its latest report vide No CI.FM No 18/2014 dated 29.12.14 concluded that it is not a natural death and the poisoning is through oral route, which include injectable route also. Thus, the Respondent No. 3 had registered an *FIR* No. 4 of 2015 lodged at Sarojini Nagar Police Station on 01.01.2015 under Section 302 of India Penal Code for murder of the deceased.

vii. That Dr. Sudhir Gupta, who headed the team of forensic experts that conducted the postmortem had admitted that he was pressured by top officials to show the death of the deceased as a "natural death", he further claimed that he is now being targeted because he

did not bow to the pressure and gave a report stating that Sunanda's death was caused by drug poisoning that could be both suicidal or homicidal. It is submitted that the said statement was also published on 2nd July, 2014 edition of Times of India. A true copy of the said edition of times of India news paper dated 02.07.2014 is annexed herewith and marked as **ANNEXURE P-3 (PAGES TO)**. However, the said statement of Dr.Sudhir Gupta, was rejected by was AIIMS spokespersons Mr. Amit Gupta and Mr. Neerja Bhatla.

- viii. That in the subsequent medical board opinion, the said board suggested some medico legal points were required to be addressed by the Investigation Officer, which inter alia includes circumstantial information regarding e-mail dated 26.01.2014 sent by Dr. Rajiv Bhasin, Noida and email dated 12.02.2014 sent by Dr.Anil Gupta (Cooper Health clinic, Dubai, UAE) after death of the deceased Late Smt Sunanda Pushkar requires investigation to establish their speculation about the decease and cause of death. The Investigation Officer filed his reply which specifically includes the email exchange between Mr. Shashi Tharoor and Dr. Rajiv Bhasin, the said email is reproduced herein below:

Re: Important

26th January 2014 21:25

Shashi Tharoor <tharoor.shashi@gmail.com>

To: Dr. Rajiv Bhasin <bhasin.rajeev@gamil.com>,

Anil Chatta <anilchatta@yahoo.com>

Cc: Abhinav Kumar <abhinav@tharoor.in>

Thanks Rajiv. I am drawing this to the attention of Dr. Mishra of AIIMS through our mutual friend Anil Chatta. I recall your fear that without regular hydration and salt intake she could suffer from recurring episodes of dangerously low blood pressure. Clearly this must have occurred since she was not eating or drinking properly for two or three days.

Thanks for alerting us to this.

On 26 Jan 2014 09:52, "Rajeev Bhasin"

bhasin.rajeev@gmail.com>

wrote:

> Hi Shashi,

> I've been regarding the newspaper reports saying that Sunanda had

been drinking only coconut water for 3 days before her demise.

> I recollect that I had seen and examined her on 04.12.2013 when you had called me in a panic because she had high fever and was finding it very difficult to breath. At that point, her B.P. was around 90/60 and she had improved when we gave her electoral and nimbupani.

> If she had no food over 3 days and had only coconut water which

has a very high content of potassium, this could have elevated her serum potassium levels and possibly slowed her heart rate.

> In addition, if she took alprax, it could have contributed to the slowing down of her heart rate and made it possibly difficult for her to call for help.

> My heartfelt condolence Shashi. I shall always cherish her memories.

> *May God give Shiv and you the strength to bear the loss.*

> *Rajeev.*

> *Dr. Rajeev Bhsain.*

> *+919811014733*

> *Sent from my iPad.*

Abhinav Kumar <abhinav@tharoor.in>

26

January 2014 21:49

To: Shashi Tharoor <tharoor.shashi@gmail.com>

Got it sir.

Abhinav Kumar IPS

PS to Dr. Shashi Tharoor

Minister of State, Ministry of HRD

Room No. 115 C, Shastri Bhawan

Dr. Rajendra Prasad Road, New Delhi 110001

Tel: 23384073/23381567/23386163

To whom it may concern

February 12th 2014

Re: Sunanda Pushkar Tharoor

I am a child specialist originally qualified from India, trained in UK and have been working in Dubai for the last 15 years.

Sunanda Pushkar was a close family friend for the last 9 years.

We are very saddened by her tragic death and even more distressed about the media speculation about the cause of her death. Whilst I do not claim to know the facts surrounding her death. Being a close friend who happened to be a doctor I was privy to some medical issues in her life. I wish to document these as this information might help in determining cause of her death.

1) She told me had Lupus and was consulting a LUPUS expert.

2) In recent months there were several such episodes of plummeting blood pressure in Dubai during her visits here. Which led Dr. Tharoor (calling from India) on her son to call me for professional advice. I was concerned that leaving frequent episode of low blood pressure untreated could lead to serious consequences and I urged her to seek the attention of a specialist, which I understand she never did.

3) She used to bruise easily and we have discussed this several times in passing. A mere injection for blood test or bumping into a piece of furniture could result in visible bruising. I am concerned as bruising on her body is being discussed as inflicted in the media.

I write this completely on my own initiative in the home that it might shed some light on caused of her death.

Dr. Anil Gupta

*M.B.B.S., D.C.H. (LON), M.R.C.P. (PAED) (IK),
F.R.C.P.*

(GLASSGOW) F.R.C.P. CH (UK)

Cooper health Clinic

Dubai, UAE

A true typed copy of the said reply dated 27.09.2014 filed by the Investigation Officer is annexed hereto as **ANNEXURE P-4 (PAGES TO)**.

It is submitted that Mr. Shashi Tharoor provided this information on his own and without asking or inquiring from the said Medical

Board. In view of the said email it is pertinent to mention that the Medical board in its opinion specifically interpreted the medical documents of the deceased, which is as under:

Interpretation of Medical Documents of Deceased

Sunanda Pushkar:

1. *Deceased Sunanda Pushkar did not have any cardiac problem. She was having a normal healthy heart.*
2. *Deceased Sunanda Pushkar was not suffering from Hypertension.*
3. *Deceased Sunanda Pushkar was not suffering from Diabetes.*
4. *Deceased Sunanda Pushkar was not suffering from Tuberculosis.*
5. *Deceased Sunanda Pushkar did not have any disease of brain, lungs, liver & kidneys.*
6. *Deceased Sunanda Pushkar was thoroughly investigated for various autoimmune/connective tissue disorders and was found to be normal.*
7. *Deceased Sunanda Pushkar Tharoor investigated for Systemic Lupus Erythematosus (SLE); however she was not found to be suffering from **LOPUS**.*

Inference of medical documents:

All above medical documents (211 pages) given by I.O. conclude that deceased Sunanda Pushkar was neither ill or had any disease prior to her death. She was a normal healthy individual.

From the above the probable inference can be drawn that Mr.Shashi Tharoor had tried to mislead the medical board with the help and

collusion with Dr.Bhasin, Dr.Anil Gupta and Mr. Anil Chatta through Dr.Mishra of AIIMS. Thus, it is also probable that Mr. Shashi Tharoor had tried to influence the Medical Board by using his official position and providing uncalled and unwanted information to the medical board through Mr.Mishra of AIIMS.

- ix. That during the course of investigation in the instant case, it has been revealed that during the relevant time i.e., 13th January, 2014 to 18th January, 2014 three foreign nationals were staying in the said Leela Hotel at New Delhi with fake passport. It is also pertinent to mention that the Subsequent Medical Board opinion vide PM No. 77/2014, specifically states that there are some poisons which cannot be detected by India Forensic Labs are as follow :

Thallium

It is difficult to isolate thallium in bodily fluids. The monovalent thallium ion, Tl^{+1} , has properties similar to that of the commonly-present sodium and potassium ions, Na^{+1} and K^{+1} respectively, making identification without a sophisticated instrumental chemical laboratory very difficult.

Polonium-210

It is a rare and highly radioactive isotope. It is hard to detect because all the radiation remains in the body. A lethal dose could be as little as a few milligrams, which could be administered as a powder or dissolved in liquid/drinks.

Nerium oleander

It contains oleandrine glycosides which cross reacts & gives positive results of digoxin immunoassay.

Snake bites

It is not possible to detect the venom by chemical analysis as the venom is destroyed very fast. The 'no poison' given by the toxicologist rules out the presence of other poisons in the tissues than snake venom. Snake venom is a Protein and cannot be separated from body tissues. Immunoassay method may detect these poisons but this facility is not easily available in all FSL's.

Photolabile poisons

Ergot alkaloids, phenothiazine and lysergide are sensitive and get decomposed in the light and are not easily identified.

Heroin

The heroin (Diacetyl Morphine) is very difficult to detect as it is rapidly hydrolyzed to monacetyl morphine and morphine.

- x. Further, it is submitted that the Respondent No.3 till date have not ruled out the reasons for murder of the deceased with money laundering / IPL. Thus, it is submitted that this case has international national ramifications.
- xi. That Late Smt. Sunanda Pushkar had made a confession telephonically to Ms. Nalini Singh, a journalist, at 12.10 am (odd time) just before her death i.e., 16/17.01.2014 that she had 'taken over the crimes' of Mr. Tharoor in the "IPL matter". The statement of Ms. Nalini Singh recorded by LD. Shri Ashok Kumar, SDM, Vasant Vihar is as under:

Statement to SDM Mr. Alok Sharma

I, Nalini Singh, knew Ms. Sunanda Tharoor socially for the last three to four years.

Over the last one year or so, Ms. Tharoor had started talking to me about her private life, particularly about her relationship with Mr. Shashi Tharoor. These conversations were few and far between.

About six to seven months ago Ms. Tharoor had shared her 'pain' at what she regarded as mutual romantic interest between Mr. Shashi Tharoor and a Pakistani journalist by the name of Ms. Mehr Tara. She told me she was sure that Mr. Tharoor and Ms. Tarar had spent three days and nights together in Dubai in June '13', and told me that since she had a strong 'base' in Dubai, her friends had informed her about the time the two had allegedly spent together and Ms. Tharoor claimed she had 'proof' of the alleged assignation.

At 12.10 am on the intervening night of January 16th – 17th, I got a call on my mobile from Ms. Sunanda Tharoor (from her mobile number 9999557007). She sounded extremely distraught, upset and was sobbing. In this frame of mind Ms. Tharoor repeated that Mr. Tharoor and Ms. Tarar had exchanged intimate romantic messages, that one message from Ms. Tarar implied that Mr. Tharoor was going to divorce Ms. Sunanda Tharoor after the forthcoming General Elections and marry Ms. Tarar, and that Ms. Tahar has written in a message that she cannot live without him. Ms. Tharoor also alleged that Mr. Tharoor's family was 'encouraging' this 'affair'.

To my query if the Twitter messages posted from Mr. Tharoor's account were genuine, she had said they were completely genuine, and somebody who 'cared for her deeply', had posted them in the public space. Incidentally, she also said that she had 'taken over the crimes' of Mr.

Tharoor in the IPL matter, but did not state if she was going to 'expose' this matter.

When I told her that she and Mr. Tharoor had issued a statement that morning that they were happily married, she said that Mr. Tharoor had told her that he wanted to issue this statement, and she had told him angrily to do whatever the (four letter word) he wanted to do.

Ms. Tharoor also told me that she was extremely ill with Lopus (which she had mentioned six months ago, too), stomach TB and added that she now feared cancer too. She said that she had checked herself into a Hospital in Kerala, and that Mr. Tharoor had 'never once taken her to a Doctor or to a Hospital'.

During this conversation she told me that she wanted my help. On my asking what it was, she replied that she wanted me to retrieve important BBM messages that Mr. Tharoor had deleted from his Blackberry. She added that she needed to retrieve, these although she had a 'stock' of such messages already with her. I asked how she would get Mr. Tharoor's Blackberry, to which she replied that she would manage that.

During this conversation she was joined by somebody to whom she asked something about 'Sahib', and the male voice answered in Hindi, although I did not hear what he said. When I suggested that I disconnect if she was now joined by somebody else, she said that I was not to do that, and that she had asked for Mr. Tharoor to come to visit her. She confirmed that she was at The Leela Hotel.

Ms. Sunanda Tharoor also mentioned during this conversation that Mr. Tharoor had a previous romantic liaison with some other woman, and in this context she

mentioned something about a fight from Pune (as far as I recall), but I cannot recall details.

Nalini Singh

Mobile 9810060005

*Office: 601, Kanchenjunga Building, Barakhamba Road,
New Delhi-110001.*

- xii. That the Delhi Police sources informed to IBM.LIVE on 14.01.2015 that Smt. Sunanda Pushkar's murder case is a open and shut case and shown their real intention by saying that there is no hurry to question Mr. Tharoor in the mysterious death of the deceased. A true copy of the news reported on the site of IBN.LIVE dated 14.01.2015 is annexed herewith and marked as ANNEXURE P-5 (PAGES TO).

13. **GROUND:-**

- A. *Because the deceased was an international media figure* due to her successful career as an international businessperson and the wife of the Former Indian Diplomat and Politician Mr. Shashi Tharoor and a co-owner of the India-based company namely M/s. Rendezvous Sports World and a stake holder of IPL cricket team known as "Kochi Tuskers Kerala". Thus, the investigation of the instant case caused international ramification.
- A. Because the Police authority failed to act proactively and the same is evident from the fact that the police authority have registered an FIR on 01.01.2015, almost after one year from the date of her unnatural death on 17.01.2014.

B. Because the Respondents flagrantly violated the positive directions issued by the Hon'ble Supreme Court and this Hon'ble Court with regard to the registration of First Information Report in *Lalita Kumari Vs. Govt. of Uttar Pradesh & Ors.* (2014 (2) SCC 1);

(i) *Registration of FIR is mandatory under Section 154 of the Code, if the information discloses commission of a cognizable offence and no preliminary inquiry is permissible in such a situation.*

(ii) *If the information received does not disclose a cognizable offence but indicates the necessity for an inquiry, a preliminary inquiry may be conducted only to ascertain whether cognizable offence is disclosed or not.*

(iii) *If the inquiry discloses the commission of a cognizable offence, the FIR must be registered. In cases where preliminary inquiry ends in closing the complaint, a copy of the entry of such closure must be supplied to the first informant forthwith and not later than one week. It must disclose reasons in brief for closing the complaint and not proceeding further.*

(iv) *The police officer cannot avoid his duty of registering offence if cognizable offence is disclosed. Action must be taken against erring*

officers who do not register the FIR if information received by him discloses a cognizable offence.

- (v) *The scope of preliminary inquiry is not to verify the veracity or otherwise of the information received but only to ascertain whether the information reveals any cognizable offence.*

C. Because the Respondents failed to follow the guidelines laid down by this Hon'ble Court in Radha Vs State 2011 (179) DLT 810 & (Crl. Misc (C) No. 3494/2008 dated 18.05.2011) by this Hon'ble Court regarding the scope and applicability of Section 174 of the Code of Criminal Procedure and section 154 (1) Cr. PC.

“10. The, First Information Report” sets into motion the process of criminal machinery. The Hon’ble Apex Court and various High Courts of the country through various authoritative legal pronouncements have time and again taken an unequivocal view that where a complaint is made to the police officer which discloses commission of a cognizable offence, it is the statutory duty of the police to register an FIR and then proceed to hold investigation in the complained offence, but unfortunately the voice of various High Courts and even the Highest Court of the land has fallen on deaf ears of not only the lower officials but also of the rank of Joint Commissioner of Police, Additional Commissioner of Police and the

Top Cop of the Delhi Police as well. To give a reminder of the same to the Delhi police once again, it has become imperative to reiterate the dicta of law laid down by the Hon^{ble} Supreme Court through various pronouncements.”

Further in:

“Para. 14. This court can take judicial notice of the factual scenario as to how the provision of Section 154 is being worked out by the police officers in practice at the ground. Filing of a large number of petitions under Article 226 of the Constitution complaining inaction on the part of the police authorities to register the crime despite information given/complaint made to the concerned police authorities is a clear indication that the concerned police officers are generally loath to register a crime more particularly so in disclosing certain trivial cognizable offences and economic offences.”

- D. Because similar to the case of Radha Vs. State 2011 (179) DLT 810, the police in present case has taken a laid back approach and has chosen to register the FIR at its sweet will, the inquest has also consumed a miserably long time to culminate. The Delhi Police has chosen to seek refuge in the delay in the culmination of the inquest proceedings for delay in filing of the FIR. However, it cannot be denied that the

police was not aware of the fact that the mysterious death of Ms. Pushkar had been on account of poisoning as early as 30.09.2014 when it received the 'Subsequent Medical Board Opinion in the Case of Late Sunanda Pushkar vide PM No. 77/2014'. Further the delinquency of the IO, SHO, Sarojini Nagar is also evident from the observation in the report which highlights the non-cooperation of the Investigating Officer in not submitting the relevant information inspite of being required to do so by the Medical Board vide letter No.

CL FM 18/2014 dated 04th April 2014.

E. Because the insensitivity of the Police in the instant case has forced the common man to infer connivance/influence of some influential person or persons over the police. The Police has once again proven worthy of its dubious distinction of being partisan of the power yielding somebodies and has on the way belittled the value of human life.

F. Because the Police has failed to lodge an FIR in the present case for a period almost one year after the mysterious death for the reason better known to them. It is the settled law that mere registration of an FIR in every case may not result into arrest of a person accused of the offence. But certainly the police cannot postpone the registration of an FIR where the information laid by the complainant before it clearly discloses commission of a cognizable offence. The police is expected to take fair, impartial and sincere steps whenever any crime is committed as the prime function of the police is

to protect the lives of the people and also to maintain the law and order situation to ensure a crime-free society. It would be useful here to refer to the observations of the Hon'ble High Court of Punjab & Haryana in the case of Amrik Singh vs. The State of Punjab 1983 CRI.L.J 1405 where it was held as under:

"17. The duty of the police is to prevent and detect crime and to bring the accused to justice. Lord Denning, Master of the Rolls in his book titled "The Due Process of Law", 1980 Edn., in Chap. I of Part Three, has observed about the role of the police as follows: - "In safeguarding our freedoms, the police play a vital role. Society for its defence needs a well-led, well-trained and well-disciplined force of police whom it can trust; and enough of them to be able to prevent crime before it happens, or if it does happen, to detect it and bring the accused to justice. The police of course, must act properly,"

- G. Because the investigation in the present case is tainted and aimed at to save some influential people and not to bring them to justice. Under the law the investigator is enjoined upon to unearth the crime and as soon as he receives the information about the crime, he is to proceed to the spot, ascertain the facts and circumstances of the case and arrest the suspected offenders, collect the evidence relating to the commission of the offence, examine various persons

including the accused, reduce their statements into writing, to search the places and take into possession the things considered necessary for the.

- H. Because, the conduct of the concerned officials of the Delhi Police in the present case is highly deplorable, it is also astonishing note that the senior officers failed to arrest this rot and came out in defense of the shoddy inquiry instead of coming forward to rectify their reprehensive conduct of not registering an FIR for one year in such a case involving murder of celebrity and wife of a former union minister.
- I. Because the Petitioner Organization and the general public has borne the harrowing brunt of a tardy investigation; in the peculiar circumstance it is a fit and deserving case where the investigation needs to be transferred to a more professional investigating agency like the CBI. No doubt the CBI, which is considered to be a premier investigating agency of this country is already burdened with many important investigations involving huge scams, but keeping in view the fact that the death of a well known lady and the slack investigation conducted by the Delhi Police and also the shamble no justifications given by the senior officers of Delhi Police in not registering an FIR for a period of one year and no explanation about how and who committed the murder, the CBI is the only other agency which can be looked up to carry on the investigation in this case impartially under the supervision of this Hon'ble Court. The

CBI may be directed to complete the investigation as early as possible in the interest of justice.

- J. Because it is an appropriate case to impose huge cost upon the Delhi Police for their illegal, contemptuous and defiant approach in not following the law of the land and the said amount shall be paid to the Delhi Legal Service Authority in

lines of the Judgment in Radha Vs. State.

- K. Because the prayer for an investigation by CBI assumes importance in light of the media reports categorically indicating the suspicious unauthorized/ illegal presence of of three foreign nationals in the Hotel on the same day on the basis of fake passports and identity, which was also confirmed by the police. The incident is a murder, as per the version of the medical board is by means of administering poison, even the most premier institutes in the Country could not detect the mode of intake or variety of the poison. The Medical Board has also opined that the Investigating Agency should seek the help of International Forensic labs to detect the exact identity of the poison administered. Therefore the issue has an international ramification and in the interest of justice the matter has to be investigated by the premier investigative agency of the nation.

- L. Because the reliable sources reported that huge level of money laundering is ensued in the tenure of the formation of India Premium League, the deceased and her husband were active cohort in that deal. The incidents and chain of events before and after the death of the deceased leaves lots of mystery, a careful examination of the attitude of the

investigation agency directly indicating, high level political influence was taken place in the present case, even the then Health Minister, Union of India directly issued direction to the forensic department of All India Institute of Medical Sciences. Dr. Sudhir Gupta was divulged the same before the media and it was widely reported in visual and print media. The media report states that the deceased was vigorously involved in deals with a Pakistani Businessman before her death and the quantum of the deal was amounting to \$10 billion.

M. *Because the Respondent No.3 till date have not ruled out the reasons for murder of the deceased which includes* money laundering and the involvement of Mr.Shashi Tharoor in IPL Kochi franchise controversy. Infact, it was alleged that Mr. Shashi Tharoor just before 18 days from IPL cricket team “Kochi Tuskers Kerala” bidding, while the deceased was the director of the company M/s. Rendezvous Sports World, misused his ministerial position getting free stake in the said company. Thus, it is submitted that this case has international national ramifications.

N. That the Investigation Agency has for the procedure under Section 174 of Code of Criminal Procedure, however the police in the present case has consumed a miserably long time in the inquest proceedings. The purpose of holding the inquest as per Section 174 C.r.P.C is very limited, it is to ascertain whether the person has committed suicide or has

been killed by an animal or by accident or murdered or has died by some other reason raising reasonable suspicion that some other person has committed the offence. The inquest proceedings under the scheme of Code of Criminal Procedure cannot take place of an investigation. The Investigation Agency thus cannot take refuge of the said inquest report to say that based on the observations of the inquest, postmortem and the initial findings, the Investigating Officer did not think it appropriate to register a case of murder. The case in hand clearly depicts the insensitivity of the Delhi Police and its pachydermatous indifference to the suffering of a common man.

- O. Because the accused persons are very powerful and influential person and the same is evident from the fact that Dr. Sudhir Gupta admitted that he was pressured by top officials to show the death of the deceased as a "natural death", though spokespersons of AIIMS namely Mr. Amit Gupta and Mr. Neerja Bhatla had denied the same. However, the Medical Board vide their subsequent opinion have specifically asked the Investigation Officer to provide information pertains to medico legal related to the email exchange between Mr.Shashi Tharoor and Dr.Rajiv Bhasin regarding stipulation of cause of death. Wherein Mr.Shashi Tharoor had tried to establish their speculation regarding the disease and cause of death was LUPUS disease of Smt Sunanda Pushkar before the medical board with the help and collusion with Dr.Bhasin, Dr.Anil Gupta and Mr. Anil Chatta

through Dr.Mishra of AIIMS. Thus, it is sufficient enough to draw an inference that the persons involve in the murder of the deceased are very powerful and influential person and it is very likely that they may not allow the investigation agency to proceed in proper direction.

P. Because the investigation of the instant case have international ramification as the same can be drawn from the fact that three foreign nationals were staying in the said hotel between 13.01.2014 to 18.01.2014 with fake passport and after the death of Late Sunanda Pushkar, the foreign national left the hotel.

Q. Because the death is an unnatural death and with 7 years from the date of marriage with Mr. [Shashi Tharoor](#), a Former Indian Diplomat and Politician.

R. Because the death took place in the instant case as a result of Organized crime. Further it is submitted that the death caused in such a suspicious circumstances and occasion that leads to the probability of existence of some serious conspiracy, which involves high profile politician, senior bureaucrats and national and international corporate.

S. Because the death caused soon after the relation of the deceased and her husband Mr. Shashi Tharoor got strained as reported in media that is also within 7 year of their marriage.

T. Because the Police authority failed to act upon the first medical opine regarding cause of death of Smt. Sunanda Pushkar. It was opinion of the Autopsy Board of three Forensic Doctors at AIIMS vide P.M. No. 77/14 to the

best of their knowledge and belief that the cause of death is poisoning.

- U. Because the Respondent No.3 have not considered the confessional statement made by Late Sunanda Pushkar telephonically to Ms. Nalini Singh just hours before her death.
- V. Because Article 39A of the Constitution of India ensures justice to every citizen of the nation the Petitioner is a registered organization working for the betterment of the society.
- W. Because Article 19 (1) (a) of the Constitution of India guaranteed the Petitioner and the general public to know the truth about the mysterious murder of the deceased.
- X. Because this case deserves interference of this Hon'ble Court to ensure fair investigation of the instant case and to ensure complete justice.

- 14. That the Petitioner has not filed any other similar petition before any other Court and the Hon'ble Supreme Court of India.

PRAYER:

Thus, in the present facts and premise, it is most respectfully prayed before this Hon'ble Court pleased to :

- (i) Direct the Respondents to produce the Case Diary and all the details pertaining to the death of Mrs. Sunanda Pushkar Tharoor and/or;
- (ii) Pass a direction/order in the nature of Mandamus or any other appropriate writ /direction/order to the Respondent

No.1 to conduct a detailed investigation into the FIR No. 4 of 2015 lodged at Sarojini Nagar Police Station on 01.01.2015 under Section 302 of India Penal Code for murder of Late Smt. Sunanda Pushkar Tharoor, wife of Shri Shashi Tharoor, resident of 97, Lodhi Estate, New Delhi, and/ or;

(iii) monitor and supervise the investigation conducted by the Respondent No.1/CBI into the FIR No. 4 of 2015 lodged at Sarojini Nagar Police Station on 01.01.2015 under Section 302 of India Penal Code for murder of Late Smt. Sunanda Pushkar Tharoor, wife of Shri Shashi Tharoor, resident of 97, Lodhi Estate, New Delhi; and

(iv) Direct the Respondent No.3 to fix responsibility for such serious dereliction of duty and to pay exemplary cost of Rs.10 Lakh for the dereliction of duties and non-compliance judicial pronouncements of this Hon'ble Court and Apex Court.

(v) Direct the appropriate authority to initiate disciplinary proceedings against the erring Police officers in charge of the Investigation for not following the positive directions passed by the Hon'ble Supreme Court in Lalitha Kumari Vs. State of U.P. (2014 (2) SCC 1) and Radha Vs. State (Crl. Misc. (C) No. 3494/2008); 2011 (179) DLT 810 passed by this Hon'ble Court, and/or

(vi) Direct the Respondent No. 3 to strictly follow the directions of the Hon'ble Court in Lalitha Kumari Vs. State of U.P. (Lalita Kumari v. Govt. of U.P., (2014) 2 SCC 1) and Radha

Vs. State (Crl. Misc. (C) No. 3494/2008; 2011 (179) DLT
810) passed by this Hon'ble Court in letter and spirit in
future; and

(vii) Pass any other or further order as this Hon'ble Court may
deem fit and proper in the interest of justice.

AND FOR WHICH ACT OF KINDNESS THE PETITIONER SHALL
DUTY BOUND EVER PRAY.

**SOLICITORSINDIA LAW OFFICES
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Dated: 20.01.2015
New Delhi.

IN THE HIGH COURT OF DELHI AT NEW DELHI

(EXTRAORDINARY WRIT JURISDICTION)

WRIT PETITION (CIVIL) NO. OF 2015

(IN THE MATTER OF A PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

ANTI CORRUPTION FRONT

PETITIONER

VERSUS

DIRECTOR, CENTRAL BUREAU OF

INVESTIGATION AND OTHERS

RESPONDENTS

**APPLICATION FOR UNDER ARTICLE 226 OF CONSTITUTION
OF INDIA FOR EXEMPTION FROM FILING THE ORIGINALS
OF ANNEXURES 1 TO 5.**

THE APPLICANT ABOVE NAMED

MOST RESPECTFULLY SHOWETH:

1. That the Applicant has filed a Public Interest Litigation under Article 226 of Constitution of India.
2. That in support of his case, the Applicant has filed true photocopies of **Annexure 1 to 5**. The originals of above said Annexure 1 to shall be filed before this Hon'ble Court as per the directions.

PRAYER

It is therefore, most respectfully prayed that this Hon'ble Court may be pleased to:

- (a) Exempt the Applicant from filing the originals of Annexures 1 to 5
and or;
(b) Pass any other order(s) as this Hon'ble Court may deem fit and
property in the interest of Justice.

Counsel for the Petitioner

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Dated: 20.01.2015
New Delhi.