

IN THE HIGH COURT OF KERALA AT ERNAKULAM

PRESENT

THE HONOURABLE MR. JUSTICE K. BABU

FRIDAY, THE 16TH DAY OF DECEMBER 2022/25TH AGRAHAYANA, 1944

WP (CRL.) NO. 1078 OF 2022

PETITIONER:

G. S. SREEKUMAR
AGED 46 YEARS
S/O C.GOPALAKRISHNAN, TC 5/1404,
THANKA BHAVAN, SREEKARIYAM, SREEKARIYAM P.O,
THIRUVANANTHAPURAM - 695017.

BY ADVS.K.R.RAJKUMAR
JAGADEESH LAKSHMAN
RAHUL RAJ

RESPONDENTS:

- 1 THE STATE OF KERALA
REPRESENTED BY THE CHIEF SECRETARY,
GOVERNMENT SECRETARIAT,
THIRUVANANTHAPURAM - 695001.
- 2 THE STATE POLICE CHIEF, KERALA,
POLICE HEAD QUARTERS, VAZHUTHACAUD,
THIRUVANANTHAPURAM - 695033.
- 3 THE DIRECTOR
CENTRAL BUREAU OF INVESTIGATION,
PLOT NO: 5 B, LODHI ROAD,
JAWAHARLAL NEHRU STADIUM MARG,
CGO COMPLEX, NEW DELHI - 110003.
- 4 THE DIRECTOR
VIGILANCE AND ANTI-CORRUPTION BUREAU (VIGILANCE DIRECTORATE).
VIKAS BHAVAN PO, LAW COLLEGE ROAD,
PALAYAM, THIRUVANANTHAPURAM - 695033.
- 5 ARYA RAJENDRAN S, MAYOR,
THIRUVANANTHAPURAM MUNICIPAL CORPORATION,
VIKAS BHAVAN, PALAYAM,
THIRUVANANTHAPURAM - 695033.

6 D. R. ANIL, LDF PARLIAMENTARY PARTY SECRETARY,
THIRUVANANTHAPURAM MUNICIPAL CORPORATION,
VIKAS BHAVAN, PALAYAM, THIRUVANANTHAPURAM - 695033,
RESIDING AT KANAVU, PRA - 20 E, PUTHUPPALLY LANE,
MEDICAL COLLEGE P.O., THIRUVANANTHAPURAM - 695011

R1, R2 & R4 BY DGP SRI.T.A.SHAJI
SRI.P.NARAYANAN, SENIOR G.P. AND ADDL.PUBLIC PROSECUTOR()
SHRI.SAJJU.S., SENIOR G.P. ()
SRI.RAJESH A, SPL.G.P. (VIGILANCE)
R3 BY DSGI SRI.S.MANU
R5 BY ADV.SRI.SUMAN CHAKRAVARTHY
R6 BY ADVS.SRI.THOMAS ABRAHAM
SMT.MERCIAMMA MATHEW
SRI.ASWIN.P.JOHN
SRI.R.ANANTHAPADMANABAN
SRI.PAUL BABY

THIS WRIT PETITION (CRIMINAL) HAVING COME UP FOR
ADMISSION ON 16.12.2022, THE COURT ON THE SAME DAY
DELIVERED THE FOLLOWING:

“C.R.”

JUDGMENT

The petitioner is an Ex. Councillor of Thiruvananthapuram Municipal Corporation. Respondent No.5 is the Mayor of Thiruvananthapuram Corporation. Respondent No.6 is the Councillor elected from Medical College Ward Constituency of the Corporation. Respondent Nos.1 to 4 are official respondents.

FACTS

2. The petitioner has come across information from the media that respondent Nos.5 and 6 had requested the District Secretary of the Communist Party of India (Marxist) [CPI(M)], the ruling political party, to provide the list of party members for appointment to various posts in the Health Division of the Municipal Corporation. The petitioner found copies of the letters sent by respondent Nos.5 and 6 on their official letterheads in the media. In the copy of the letter (Ext.P1) addressed to the District Secretary of the CPI(M), respondent No.5 had requested to take necessary steps

to make available the priority list of candidates to be appointed in the Health Division of Thiruvananthapuram Municipal Corporation on contract basis. In Ext.P2 letter respondent No.6 had made a similar request to the Party Secretary.

2.1. The petitioner alleges that it is the usual practice of the Corporation to select persons having political affiliation for appointment in the Corporation. The action of respondent Nos.5 and 6 sending a communication to the District Secretary of the CPI(M) requesting to provide the list of persons to be employed in the Municipal Corporation is against the oath taken by both of them when they had sworn in as Councillors of the Thiruvananthapuram Corporation. The action of respondent Nos.5 and 6 is an attempt to subvert the employment chances of thousands of unemployed youth.

2.2. The petitioner filed Ext.P3 complaint before the Director, Vigilance and Anti-Corruption Bureau (respondent No.4). The petitioner understands that on 7.11.2022 respondent No.5 filed a complaint before the Chief Minister relating to the surfacing of Ext.P1 letter in the media. The petitioner apprehends that an impartial investigation into the allegations levelled by him is impossible due to political reasons.

3. Therefore, the petitioner prayed for the following reliefs:-

- (i) a writ of mandamus or any other appropriate writ directing respondent No.4 to register Exhibit P3 complaint lodged by the petitioner.
- (ii) a writ of mandamus or any other appropriate writ directing the State Government to hand over the investigation on Ext.P3 complaint to the Central Bureau of Investigation.

3.1. Alternatively, the petitioner prayed for issuing a writ of mandamus directing the Government to appoint a sitting Judge not below the rank of Subordinate Judge to conduct inquiry into the matter.

4. Respondent No.5 resisted the petition contending that the petition is not maintainable. Respondent No.5 submitted that she had left Thiruvananthapuram on 31.10.2022 for Delhi in connection with an official programme and came back only on 4.11.2022. When she returned to Thiruvananthapuram she came across the news regarding the circulation of a forged letter in her name through social media and newspapers. On going through the letter she realised that

somebody created the said letter with malicious intentions and an oblique motive to vex political vengeance against her. She initiated action, and based on her complaint Crime No.225/2022 has been registered by the Crime Branch Police Station, Thiruvananthapuram alleging offences punishable under Sections 465, 466 & 469 of the Indian Penal Code. The Crime Branch Police has already started an investigation into the matter. Respondent No.5 further contended that the averments contained in the writ petition are derogatory and defamatory. The petitioner has not satisfied the requirements for seeking an investigation by the Central Bureau of Investigation.

5. Respondent No.6 pleaded that he had not indulged in any act which would amount to corruption. He stated that a perusal of Ext.P2 would show that the vacancies mentioned are not in the Municipal Corporation but in the Scheme coming under the National Urban Livelihoods Mission sponsored by the Central Government. Respondent No.6 submitted that Kudumbashree Mission is selected as the Nodal Agency for the implementation of the project in the State, and he has no role in the appointments made under that Scheme. According to him, the contents of Ext.P2 do not reveal any of the offences as alleged by the petitioner. The male bystanders'

restrooms attached to SAT Hospital, Thiruvananthapuram have been remaining non-functional and he has been taking consistent efforts to ensure it functional as part of discharging his duties as the Councillor of Medical College Ward. Ext.P2 is information regarding the requirement for filling the existing vacancies, as the absence of required personnel has resulted in a situation where the laudable service to the needy among the public could not be extended. In Ext.P2, there is no offer for an appointment, favour, or gratification and therefore, there is no basis for the allegation of corruption. According to him, he has not indulged in any act which would result in inequality of opportunity of public employment.

6. The learned Director General of Prosecution (DGP) appeared on behalf of the official respondents 1, 2 and 4. The learned DGP submitted that the Vigilance and Anti-Corruption Bureau has registered PE-14/22/SIUI and is proceeding with the matter as per law. The learned DGP further submitted that the Crime Branch Police Station, Thiruvananthapuram has registered Crime No.225/2022 based on the complaint of respondent No.5 and commenced an investigation into the offences punishable under Sections 465, 466 & 469 of the Indian Penal Code.

ISSUES

- (1) If a person has a grievance that the Police have not registered his complaint or having registered it, they have not investigated it properly, can he resort to the public law remedy under Article 226 of the Constitution of India?
- (2) Has the petitioner established the requirements for issuing a writ directing investigation by CBI in the matter?
- (3) Can the High Court issue a writ of mandamus under Article 226 of the Constitution of India to the Government to appoint a Commission of Inquiry under the Commission of Inquiry Act, 1952?

7. Heard Sri.K.R.Rajkumar, the learned counsel appearing for the petitioner, Sri.T.A.Shaji, the learned Director General of Prosecution appearing for respondent Nos.1, 2 and 4, Sri.S.Manu, the learned Deputy Solicitor General of India for respondent No.3, Sri.Suman Chakravarthy, the learned counsel for respondent No.5 and Sri.Thomas Abraham, the learned counsel appearing for respondent No.6.

8. The matter relates to the dissemination of a letter purported to have been issued by respondent No.5, the Mayor of Thiruvananthapuram Corporation, and a letter issued by respondent No.6, the Parliamentary Party Secretary of the ruling party to the District Secretary of CPI(M). Ext.P1 is the copy of the letter stated to have been issued in the name of respondent No.5. Ext.P2 is another letter issued by respondent No.6.

9. Respondent No.5 denied having authored Ext.P1 letter. Based on her complaint Crime No.225/2022 has been registered by the Crime Branch, Medical College Police Station, Thiruvananthapuram.

10. The Vigilance and Anti-corruption Bureau has registered PE-14/22/SIUI based on Ext.P3 complaint dated 5.11.2022 filed by the petitioner.

11. The learned counsel for the petitioner submitted that the petitioner apprehends that there may not be any impartial investigation into the matters alleged in Ext.P3 complaint. He prayed for directing the Government to hand over the investigation to the Central Bureau of Investigation. The learned counsel also made an

alternative prayer for directing the Government to appoint a sitting Judge, not below the rank of Subordinate Judge to inquire into the matter as per the relevant provisions of the Commission of Inquiry Act, 1952. The learned counsel relied on *Indian Oil Corporation v. (2017 KHC 6867)* and *Akhil Bhartiya Upbhokta Congress v. State of Madhya Pradesh and Others [(2011) 5 SCC 29]* to substantiate his contentions.

12. The learned Director General of Prosecution Sri.T.A.Shaji contended that Ext.P3 complaint filed by the petitioner is very cryptic and it contained only certain general allegations. The learned Director General of Prosecution relied on *All India Institute of Medical Sciences Employees' Union (Regd.) v. Union of India [(1996) 11 SCC 582]*, *Gangadhar Janardan Mhatre v. State of Maharashtra [(2004) 7 SCC 768]*, *Divine Retreat Centre v. State of Kerala and Others [(2008) 3 SCC 542]*, *Fr.Sebastian Vadakkumpadam v. Shine Varghese and Others (2018 (3) KHC 590)* and *Michael Varghese v. Chief Minister of Kerala and Others (2020 SCC OnLine Ker 2794)* to contend that the writ petition is not entertainable. The learned counsel for respondent Nos.5 and 6 supported the submissions made by the learned DGP.

13. The petitioner pleaded commission of cognizable offences by respondent Nos.5 and 6. Respondent No.5 denied having committed any offence. On the other hand, she submitted that she is not the author of Ext.P1 letter and the same has been forged by somebody else and disseminated in the public domain to wreak political vengeance against her.

14. Based on her complaint the Police have commenced an investigation after registering FIR. The Vigilance and Anti-Corruption Bureau has also registered PE-14/22/SIUI and is proceeding in the matter.

Issue No.(1)

15. Chapter XII of the Code of Criminal Procedure prescribes the procedure to investigate cognizable offences. Sub-section (1) of Section 154 Cr.P.C. says that every information relating to the commission of a cognizable offence, if given orally to an officer in charge of a police station, shall be reduced to writing by him or under his direction, and be read over to the informant and every such information, whether given in writing or reduced to writing as aforesaid, shall be signed by the person giving it, and the substance

thereof shall be entered in a book to be kept by such officer in such form as the State Government may prescribe in this behalf. Section 156 Cr.P.C. empowers the Police Officer to investigate into cognizable offence on receipt of such information and the same is reduced to writing. The procedure for investigation is provided in Section 157 Cr.P.C. After conducting the investigation prescribed in the manner envisaged in Chapter XII, charge sheet shall be submitted to the Court having jurisdiction to take cognizance of offence.

16. Section 173 Cr.P.C. envisages that as soon as every investigation is completed the officer in charge of the police station shall forward to a Magistrate empowered to take cognizance of the offence on a police report in the form prescribed by the State Government giving details therein. Upon receipt of the report, the Court under Section 190 is empowered to take cognizance of the offence. Under Section 173(8), the investigating officer has the power to make further investigation into the offence.

17. When the information is laid with the police but no action on that behalf was taken, the complainant is given power under Section 190 read with Section 200 of the Code to lay the complaint before the Magistrate having jurisdiction to take cognizance of the

offence and the Magistrate is required to inquire into the complaint as provided in Chapter XV of the Code. In case the Magistrate after recording evidence finds a prima facie case, instead of issuing process to the accused, he is empowered to direct the concerned police to investigate the offence under Chapter XII of the Code and to submit a report. If he finds that the complaint does not disclose any offence to take further action, he is empowered to dismiss the complaint under Section 203 of the Code. In case he finds that the complaint/evidence recorded prima facie discloses offence, he is empowered to take cognizance of the offence and would issue process to the accused.

18. In **Sakiri Vasu v. State of U.P. [(2008) 2 SCC 409]** the Apex Court held thus:-

"11. In this connection we would like to state that if a person has a grievance that the police station is not registering his FIR under Section 154 CrPC, then he can approach the Superintendent of Police under Section 154(3) CrPC by an application in writing. Even if that does not yield any satisfactory result in the sense that either the FIR is still not registered, or that even after registering it no proper investigation is held, it is open to the aggrieved person to file an application under Section 156(3) CrPC before the learned Magistrate concerned. If such an application under Section 156(3) is filed before the Magistrate, the Magistrate can direct the FIR to be registered and also can direct a proper investigation to be made, in a case where, according

to the aggrieved person, no proper investigation was made. The Magistrate can also under the same provision monitor the investigation to ensure a proper investigation."

19. In **Sakiri Vasu** the Apex Court further held that if a person has a grievance that his FIR has not been registered by the Police, or having been registered, proper investigation is not being done, then the remedy of the aggrieved person is not to go to the High Court under Article 226 of the Constitution of India but to approach the Magistrate concerned under Section 156(3) Cr.P.C.

20. The Apex Court in **All India Institute of Medical Sciences Employees' Union (Regd.) v. Union of India; Gangadhar Janardan Mhatre v. State of Maharashtra (supra); Minu Kumari v. State of Bihar [(2006) 4 SCC 359], Hari Singh v. State of U.P. [(2006) 5 SCC 733], Divine Retreat Centre v. State of Kerala and Others (supra), M.Subramaniam and Another v. S.Janaki and Another [(2020) 16 SCC 728], Sudhir Bhaskarrao Tambe v. Hemant Yashwant Dhage and Others [(2016) 6 SCC 277], Fr.Sebastian Vadakkumpadam v. Shine Varghese and Others; and Michael Varghese v. Chief Minister of Kerala and Others (supra)** reiterated the principles discussed above.

21. In the present case, the petitioner filed Ext.P3 complaint on 5.11.2022 and rushed to the High Court, and filed the writ petition on 8.11.2022. He had not adopted the procedure provided under the Code. The petitioner had alternate remedies to redress his grievances. Therefore, he is not entitled to the public law remedy under Article 226 of the Constitution. The issue is answered against the petitioner.

Issue No.(2)

22. The learned counsel for the petitioner submitted that respondent No.5 is entrusted with the responsibilities and obligations of a public authority for the benefit of the public. Emphasising the principle that the State and its instrumentalities are not expected to function according to the sweet will and whims of the political entities, the learned counsel submitted that an impartial investigation into the allegations contained in Ext.P3 is highly required in a system based on rule of law. The learned counsel contended that the official respondents may not conduct an impartial investigation into the allegations levelled against respondent Nos.5 and 6 and therefore, the investigation is to be transferred to the CBI.

23. A Constitution Bench of the Supreme Court in **State of West Bengal and others v. Committee for Protection of Democratic Rights, West Bengal [(2010) 3 SCC 571]**, in paragraph 70 of the judgment, held thus:-

"70. Before parting with the case, we deem it necessary to emphasise that despite wide powers conferred by Articles 32 and 226 of the Constitution, while passing any order, the Courts must bear in mind certain self-imposed limitations on the exercise of these constitutional powers. The very plenitude of the power under the said articles requires great caution in its exercise. Insofar as the question of issuing a direction to CBI to conduct investigation in a case is concerned, although no inflexible guidelines can be laid down to decide whether or not such power should be exercised but time and again it has been reiterated that such an order is not to be passed as a matter of routine or merely because a party has levelled some allegations against the local police. This extraordinary power must be exercised sparingly, cautiously and in exceptional situations where it becomes necessary to provide credibility and instil confidence in investigations or where the incident may have national and international ramifications or where such an order may be necessary for doing complete justice and enforcing the fundamental rights. Otherwise CBI would be flooded with a large number of cases and with limited resources, may find it difficult to properly investigate even serious cases and in the process lose its credibility and purpose with unsatisfactory investigations."

24. In **Secretary, Minor Irrigation & Rural Engineering Services, U.P. and Others v. Sahngoo Ram Arya and Another [(2002) 5 SCC 521]** the Supreme Court observed that an order directing an inquiry by CBI should be passed only when the

High Court after considering the materials on record comes to the conclusion that such material does disclose a prima facie case calling for an investigation by CBI or any other similar agency.

25. In **K.V.Rajendran v. Superintendent of Police, CBCID South Zone, Chennai [(2013) 12 SCC 480]** the Apex Court reiterating the above principle held thus:-

"13.....This Court has time and again dealt with the issue under what circumstances the investigation can be transferred from the State investigating agency to any other independent investigating agency like CBI. It has been held that the power of transferring such investigation must be in rare and exceptional cases where the court finds it necessary in order to do justice between the parties and to instil confidence in the public mind, or where investigation by the State police lacks credibility and it is necessary for having "a fair", honest and complete investigation", and particularly, when it is imperative to retain public confidence in the impartial working of the State agencies.....

.....
17.....the Court could exercise its constitutional powers for transferring an investigation from the State investigating agency to any other independent investigating agency like CBI only in rare and exceptional cases. Such as where high officials of State authorities are involved, or the accusation itself is against the top officials of the investigating agency thereby allowing them to influence the investigation, and further that it is so necessary to do justice and to instil confidence in the investigation or where the investigation is prima facie found to be tainted/biased."

26. In **CBI v. Rajesh Gandhi [(1996) 11 SCC 253]** the Apex Court held that no one can insist investigation by a particular agency.

27. In **Himanshu Kumar and Others v. State of Chattisgarh (MANU/SC/0891/2022)** the Apex Court after reiterating the principles discussed above held that the power to transfer an investigation must be used 'sparingly' and only in 'exceptional circumstances'.

28. In **Himanshu Kumar**, in paragraph 50 of the judgment, the Apex Court observed thus:-

"50. The Court reiterated that an investigation may be transferred to the CBI only in "rare and exceptional cases". One factor that courts may consider is that such transfer is "imperative" to retain "public confidence in the impartial working of the State agencies." This observation must be read with the observations made by the Constitution Bench in the case of Committee for Protection of Democratic Rights, West Bengal (supra), that mere allegations against the police do not constitute a sufficient basis to transfer the investigation."

29. The principle of law that emerges from the precedents referred to above is that the power to transfer an investigation must be used "sparingly" and only "in exceptional circumstances".

30. While considering the plea urged by the petitioner that the investigation is to be transferred to the CBI, I am guided by the parameters laid down in the precedents referred to above.

31. Ext.P3 complaint lodged by the petitioner does not contain any specific allegations. The averments regarding the

impartiality of the investigating agency in the writ petition are without any solid foundation. The petitioner has failed to place any concrete material compelling transfer of investigation. I am of the view that the conditions laid down by the Apex Court in **State of West Bengal and others v. Committee for Protection of Democratic Rights, West Bengal** (supra) are not fulfilled. The issue is answered accordingly.

Issue No.(3)

32. The petitioner, as an alternate relief, has prayed for directing the Government to inquire into the matters alleged in the writ petition by appointing a sitting Judge, not below the rank of Subordinate Judge. The learned counsel for the petitioner contended that the issue involved is definitely a matter of public importance and the petitioner has the *locus standi* to seek relief in the form of a writ of mandamus to direct the Government to appoint a commission to inquire into the matters alleged in the writ petition. The learned DGP contended that the petitioner has no *locus standi* to seek such a relief in the form of a writ of mandamus and the High Court cannot issue a writ as prayed for. The learned DGP relied on the Division Bench decision of this Court in **Kallara Sukumaran v. Raghuchandra Bal**

(1993 (1) KLT 699) to substantiate his contentions.

33. The prayer of the petitioner for the appointment of a commission is as provided in the Commissions of Inquiry Act, 1952. The relevant provision in the Commissions of Inquiry Act, 1952 is Section 3. Sub-section (1) of Section 3 reads thus:-

"3. Appointment of Commission.- (1) Save as otherwise provided in the Lokpal and Lokayuktas Act, 2013 (1 of 2014), the appropriate Government may, if it is of opinion that it is necessary so to do, and shall, if a resolution in this behalf is passed by each House of Parliament or, as the case may be, the Legislature of the State, by notification in the Official Gazette, appoint a Commission of Inquiry for the purpose of making an inquiry into any definite matter of public importance and performing such functions and within such time as may be specified in the notification, and the Commission so appointed shall make the inquiry and perform the functions accordingly....."

34. Construction of sub-section (1) of Section (3) of the Act makes it clear that the appropriate Government is under a statutory obligation to appoint a Commission of Inquiry in a case where a resolution on that behalf is passed by each House of Parliament or, as the case may be, the Legislative Assembly of the State and the appropriate Government has no option or discretion in the matter. In the absence of such a resolution, the power to appoint a Commission is optional and discretionary even if there is any

definite matter of public importance. The words in the section evidently point that a Commission may be appointed by the appropriate Government if it is of opinion that it is necessary so to do. As a necessary corollary, even if there is any definite matter of public importance, the Government may not appoint a Commission of Inquiry if it is of the opinion that it is not necessary to do so. There is no doubt that the inquiry as provided under the Act is not a judicial inquiry. The object of constituting a Commission of Inquiry is to enable the Government to make up its mind as to what legislative or administrative measures should be adopted to eradicate the evil found or to implement the beneficial objects it has in view. It is merely a fact finding body for the benefit of the Government.

35. It is profitable to extract the observations of the Apex Court in **Sri Ram Kishan Dalmia v. Shri Justice S.R.Tendolkar [(1959) SCR 279]**.

"8.Parliament has made a law with respect to inquiry and has left it to the appropriate Government to set up a Commission of Inquiry under certain circumstances referred to in Section 3 of the Act.....As has been stated by the High Court itself in the latter part of its judgment, the only power that the Commission has is to inquire and make a report and embody therein its recommendations. The Commission has no power of adjudication in the sense of passing an order which can be

enforced proprio vigore. A clear distinction must, on the authorities, be drawn, between a decision which, by itself, has no force and no penal effect and a decision which becomes enforceable immediately or which may become enforceable by some action being taken. Therefore, as the Commission we are concerned with is merely to investigate and record its findings and recommendations without having any power to enforce them, the inquiry or report cannot be looked upon as a judicial inquiry in the sense of its being an exercise of judicial function properly so called.....

9. In our view the recommendations of a Commission of Inquiry are of great importance to the Government in order to enable it to make up its mind as to what legislative or administrative measures should be adopted to eradicate the evil found or to implement the beneficial objects it has in view.....”

36. Going by the words of Section 3 of the Act it is crystal clear that there cannot be a legal or statutory obligation upon the appropriate Government to appoint a Commission of Inquiry even if it is a definite matter of public importance. As the Statute imposed no legal duty on the Government to appoint a Commission, the petitioner has no legal right to enforce its performance. In **Kallara Sukumaran's** case (supra) the Division Bench following a series of precedents held that a writ of mandamus cannot be issued for directing the Government to appoint a Commission of Inquiry under the Act. As the petitioner has no right under the Statute he has no

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locus standi to seek the relief as prayed for above. Issue No.3 is answered accordingly against the petitioner.

The writ petition fails and it stands dismissed.

Sd/-
K.BABU
Judge

TKS

APPENDIX OF WP(CRL.) 1078/2022

PETITIONER'S EXHIBITS

Exhibit P1 A COPY OF THE LETTER OF THE 5TH RESPONDENT, MAYOR AS RECEIVED FROM THE MEDIA, REQUESTING THE PARTY DISTRICT SECRETARY, CPI(M) TO TAKE NECESSARY STEPS TO MAKE AVAILABLE THE PRIORITY LIST OF CANDIDATES TO BE APPOINTED IN THE HEALTH DIVISION OF THIRUVANANTHAPURAM MUNICIPAL CORPORATION ON CONTRACT BASIS DATED 01-11-2022

Exhibit P2 A COPY OF THE LETTER SAID TO BE ISSUED BY THE 6TH RESPONDENT WHO IS THE LDF PARLIAMENTARY PARTY SECRETARY, THIRUVANANTHAPURAM MUNICIPAL CORPORATION AND ALSO THE CHAIRMAN OF THE STANDING COMMITTEE FOR PUBLIC WORKS, REQUESTING THE PARTY DISTRICT SECRETARY, CPI (M) TO TAKE NECESSARY ACTION TO GIVE THE LIST OF PERSONS TO BE APPOINTED BY THE CORPORATION DATED 24-10-2022.

Exhibit P3 A TRUE COPY OF THE COMPLAINT SUBMITTED BY THE PETITIONER BEFORE THE 4TH RESPONDENT, THE DIRECTOR OF KERALA STATE VIGILANCE AND ANTI-CORRUPTION BUREAU DATED 5-11-2022

TKS