



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन रोड नं. 4 के पास, नई दिल्ली - 110058

(राज्यीय कार्यालय : 39, रामनगर -बी, झोलकपुर, जयपुर)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द जैन
संरक्षक (पूर्व न्यायाधियति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोयल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजस्वानी
सलाहकार, मो. 098290-78682

पाराशर नारायण शर्मा
अध्यक्ष, मो. 094133-89665

डॉ० महावीर सिंह नाथावत
महाराधिव, मो. 07665555600

विमल चौरइया
महाराधिव, मो. 094140-58289

ललित चाखाण
कांपाध्यक्ष, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिल्ली
कैप्टेन गुरविन्दर सिंह
मो. 09314142509

छत्तीसगढ़
श्रीराम पंसेली
मो. 09879127963

हरियाणा
धर्मवीर सिंह
मो. 09353084877

मध्यप्रदेश
अशोक शर्मा
मो. 07952576032

उत्तर प्रदेश
गिरिजेश शर्मा
मो. 09412445269

उत्तराखण्ड
सी. एम. डिमरी
मो. 09411103390

छत्तीसगढ़
आर. सी. द्विवेदी
मो. 09752592333

गुजरात
धीरज जे. पंचाल
मो. 09428606409

महाराष्ट्र
संजीव शुक्ला
मो. 09821390321

कर्नाटक
विक्रममन कुष्णामूर्ति
मो. 09539966339

राजस्थान
पी. एन. शर्मा
मो. 09453389665

क्रमांक 23447-24236

दिनांक : 19.02.2020

To
Respected Mr./Ms.....
Member of Parliament,
New Delhi.

Sub:- Petitions under Article-192 of the Constitution of India,
against Chief Ministers, Speakers and MLAs who have
passed a Bill against CAA-2019

Sir,


It is our humble submission that in the Assemblies of Kerala, Punjab, Rajasthan and West Bengal a Bill has been passed to disobey/recall the CAA-2019 which has been constitutionally passed and notified by the Indian Parliament. Chief Ministers, holding constitutional posts, have categorically declared that they will not implement the CAA-2019 in their States.

This is an openly unconstitutional act of the Chief Ministers, Speakers and respective MLAs of the above States. It is a punishable offence to challenge the authority of a lawfully elected central Govt., to make the constitutionally elected Central Govt unstable, to enhance the communal disharmony in the country, to give unconstitutional patronage to violent agitations and to spread illusions throughout the country. This act is a clearcut violation of the constitutional Oath and extremely dangerous for the future of the national integrity.

Our nationalist organization has filed petitions under Art-192 before the Governors of the above States. We have prayed that the different mandatory judgments of Hon'ble Supreme Court and High Courts should be followed and the membership of respective Chief Ministers, Speakers and MLAs, who were instrumental in passing the above unconstitutional Bills should be terminated immediately.

The copies of above four petitions are being sent to your goodself for information and necessary action. Regards.

Yours sincerely,


Parashar Narayan,

Annexed: Above four petitions.



समता आन्दोलन समिति (रज.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058

(संकेत कार्यालय) : 11, रामनगर-बी, प्रतापपुर, जमुना

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द जैन
संरक्षक (पूर्व न्यायाधीश)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोयल
संरक्षक (पूर्व आई. पी. एम.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एम.)

श्री इकराम राजस्थानी
सहायकार, मो. 098290-78682

पाराशर नारायण शर्मा
अध्यक्ष, मो. 094133-89665

डॉ महावीर सिंह नाथवाक
महासचिव, मो. 07665555600

विमल खौराडिया
महासचिव, मो. 094140-58289

ललित चावण
कोषाध्यक्ष, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
राष्ट्र प्रदेशाध्यक्ष :-

दिलीप
कैप्टेन मुरविन्दर सिंह
मो. 09114142309

चण्डोग
श्रीराम पंखारी
मो. 09876127660

हरिचण्वा
धर्मवीर सिंह
मो. 09888094877

सत्यप्रदेश
अशोक शर्मा
मो. 07582574022

उमर प्रदेश
गिरजेरा शर्मा
मो. 09112445268

उमराचण्ड
सी. एम. द्विवेदी
मो. 09111100280

छलीगण्ड
आर. सी. द्विवेदी
मो. 09752392230

मृगाल
धीरज जे. पंखार
मो. 09428600409

महाराष्ट्र
संजीव शुक्ला
मो. 09881340321

कान्तिटक
यैकटरमन कुम्हारगुर्जर
मो. 09838986339

राजस्थान
पी. एन. शर्मा
मो. 09413309660

क्रमांक

दिनांक :

29.01.2020

To
The Hon'ble Governor,
State of Kerala,
Raj Bhawan, Jawahar nagar,
Thiruvananthapuram, (Kerala)

PETITION UNDER ARTICLE-192

Respected Sir,

It is my humble submission that on 31-12-2019 the Assembly of the State of Kerala has passed a resolution against the Citizenship Amendment Act-2019. New clip of The Times of India dated 01-01-2020 is annexed herewith. Before this episode Honorable Chief Minister Mr. Pinarayi vijayan had declared categorically that CAA 2019 will not be implemented in the state of Kerala. This is a clear disobedience of the Indian Constitution. This is an open revolt of an elected State Govt. and some of it elected MLAs against a duly elected Central Govt. Your Goodself should have protected the Constitution and the Federal Structure of India by dismissing the Stat Govt. through the use of powers under Article 356.

The above action of the Head of State Govt and some of electe MLAs of State Assembly is extremely painful, dangerous, unconstitutional, agains the unity and integrity of the nation and a part and parcel of the conspiracy to aggravate the communal disharmony. This is an intentional and malafide misuse of state Assembly against the duly elected central Govt. by making it unstable, to spread hatred against the duly elected central Govt., to spread communal riots in the country and to make our country unnecessarily shameful in the international arena. Crores of nationalist citizens are watching this dirty game helplessly. As Pakista Army gives coverage fire to facilitate the illegal entry of trained terrorists on border: in the same way the state Assemblies (through passing unconstitutional Bill agains Central Govt. by breaching the oath of office and violating constitutional provisions are being misused to give protection to some handful of anti national engaged in activities like anarchy, disintegration, spreading communal hatred etc. Constitution: experts are also of the view that passing of Bill by a state Assembly against a centra ACT is a prima-facie unconstitutional act and if it is not stopped immediately, it will lead to the disintegration of the country.

It is an open fact that the acts of Honorable Chief Minister Mr. Pinarayi vijayan, Honorable Speaker Mr. P. Sreeramakrishnan, Honorable Chief whips of different parties and all the MLAs voting in favour of the above unconstitutional Bill against CAA-2019 are categorically in violation of oath of office taken under Article 173 and 188 in accordance with format given in proviso VII-A and B of Schedule-3. It is also in violation of Art. 5 to 11 and 246 of the Constitution. Constitutional duties mentioned in Article 51A(a),(c) and (d) are also violated. It is absolutely essential that such type of public representatives should be brought to book.

31/1/2020



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058

(पंजीकृत कार्यालय : 24, एमएल -बी, इंदौर, मध्य)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री भास्करचन्द्र जैन
संरक्षक (पूर्व न्यायाधिपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामचंद्रपाल चोपल
संरक्षक (पूर्व आई. पी. एस्.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस्.)

श्री इकराम राजस्वानी
सलाहकार, मो. 098290-78682

पाराशर भारावण शर्मा
अध्यक्ष, मो. 094133-89665

डॉ. महावीर सिंह भास्करावत
महासचिव, मो. 07665555600

विद्याल चौरीदुया
महासचिव, मो. 094140-58289

ललित खाद्याम
कोषाध्यक्ष, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-
दिलीप

कैप्टन मुरविन्दर सिंह
मो. 09114162009

श्यामल
श्रीराम पंथारी
मो. 09875127660

हरिधर
धर्मवीर सिंह
मो. 09350294877

सत्यजित
अशोक शर्मा
मो. 07582576022

जगत प्रवेश
गिरजेरा शर्मा
मो. 09412448298

जसराजचन्द्र
सी. ए. डिग्री
मो. 09411103290

अशोकचन्द्र
आर. सी. डिग्री
मो. 09752592230

मुजाराज
धीरज जे. पंचाल
मो. 09428400409

सहायचन्द्र
संजीव शुक्ला
मो. 09821970321

चन्दरक
संकेतभवन कुष्णापुर्ति
मो. 09358964339

राजेश्वर
पी. एन. शर्मा
मो. 09413389660

क्रियांक

दिनांक :

Their membership should be terminated immediately and they should be punished under relevant sections of the Indian penal code.

We can say after reading out the various judgments passed by Honorable Supreme court and different High Courts on the sanctity of oath of office that in all these judgments the judiciary has taken it very seriously and has termed the violation or the breach of constitutional oath of office as a "betrayal of faith" and has categorically directed that "breach of oath requires a termination of the tenure of office." It has also been observed repeatedly that under Article 102, 103, 191, and 192 the President of India or the Governor of State is the competent authority respectively for the termination of membership of MP or MLA. In this regard, the judgment given by the full bench of Kerala High Court on 19 August 1985 in the matter of K.C. Chandy v/s R. Balakrishna Pillai is completely relevant. Kindly have a perusal of binding directions given in Para-7 and 9 of the Judgment:-

Para-7 "Breach of oath may thus be a betrayal of faith. The appointing authority the Governor, in such cases, can consider whether there was, in fact, any breach of oath. It is not for this Court to embark on any such enquiry."

Para-9 "Breach of oath requires a termination of the tenure of office. This power can be exercised by the appointing authority under the Constitution, and according to the procedure, if any, prescribed therein. The termination of that tenure is not the function of a court; and it would not be appropriate to exercise jurisdiction under Article 226 in such cases. Proceedings under Article 226 in such cases do not lie."

The above judgment has been again completely approved by the same Karal High court on 24-11-2017 in the matter of Alapley Asharaf V/s Chief Minister an others.

Your goodself may also have perusal of the following leading judgments of the Honorable Supreme Court. Binding directions and observations of the Apex Court in these judgments will certainly help your goodself in making up your mind that:-

- Your goodself is constitutionally duty bound to take a decision on the above complaint, and
- Your goodself is constitutionally duty bound to take an advice of the Election Commission of India in this regard.

Cases-

- B.R. Kapur v/s state of T.N. and another (2001) 7 SCC 231
- Amarinder Singh v/s special Committee, Punjab Vidhan Sabha and others (2010) 6 SCC 113
- Brundaban Nayak v/s Election Commission 12-02-1965 AIR 1892, 1965 SC (3)53 any citizen is entitled to complain. -Const. Bench
- Election commission of India & Another v/s Dr Subramaniam Swamy an another 23-04-1996 CAN0504 (NC) 1994.

Handwritten signature



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058
(पंजीकृत कार्यालय : 24, लक्ष्मी-बी, गोकुलपुर, गुरुगढ़)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द जैन
संरक्षक (पूर्व न्यायाधिपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोपाल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री हुकराम राजस्थानी
सलाहकार, मो. 098290-78682

पाराशर पाराशम शर्मा
अध्यक्ष, मो. 094133-89665

डॉ महेश्वरी सिंह माधवात
सहायक, मो. 07665555600

विमल चौरीडिया
सहायक, मो. 094140-58289

ललित चाचाण
सहायक, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिलीप
कैप्टन सुरजन्दर सिंह
मो. 08314142309

समितीनय

श्रीराम पंसारी
मो. 09879127963

हरिचाना
धर्मेन्द्र सिंह
मो. 0933064877

साम्प्रदेश
अशोक शर्मा
मो. 07383376032

उत्तर प्रदेश
गिरजेन्द्र शर्मा
मो. 09412445399

उत्तराखण्ड
सी. एम. द्विवेदी
मो. 09411103390

छत्तीसगढ़
अश. श्री. द्विवेदी
मो. 09732992331

गुजरात
धीराज जे. पंचाल
मो. 09428600409

महाराष्ट्र
संजीव शुक्ला
मो. 09821940321

कर्नाटक
संरक्षक (मानव कल्याणार्थी)
मो. 09389646339

राजस्थान
पी. एन. शर्मा
मो. 09413399665

क्रमांक :

दिनांक :

5. Election Commission of India v/s N. G. Ranga 1978 AIR 1609, 1979 SCR (1) 210. -Const. Bench

PRAYERS

On the basis of the above submissions, our prayers are-

(A) Kindly take an action and terminate the membership of all MLAs including CM, Speaker of Assembly and Chief whips of different Parties who have breached their Oath of office by managing and voting against CAA-2019 on the floor of the House.

OR IN THE ALTERNATIVE,

(B) Kindly take an action and terminate the membership of the :-

- Chief Minister MR. Pinarayi vijayan who has breached the Oath of office by openly declaring that the Govt. of Kerala will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly,
- Speaker MR. P. Sreeramakrishnan who breached the Oath of office managing in all manners the passing of a Bill against the CAA in the Assembly,
- Chief whips of different Parties in the State Assembly who breaches the Oath of office by managing the consent of all the MLAs on the bill against the CAA-2019, using duress of action under Anti Defection Act, through issuance of whip.

OR IN THE ALTERNATIVE,

(C) Kindly take an action and terminate the membership of Mr. Pinaray vijayan Chief Minister, who has breached the Oath of office by openly declaring that the Govt. of Kerala will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly.

Yours sincerely,

Parshar Narayan, President



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058
(पंजीकृत कार्यालय : 28, रामनगर -बी, फ्लोवर्ड, नए नए)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाबन्धू जैन
संरक्षक (पूर्व न्यायाधियनि)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोपाल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजस्थानी
सहायक, मो. 098290-78682

पाराशर नारायण शर्मा
अध्यक्ष, मो. 094133-89665

डॉ. महावीर सिंह नाथावल
सहायक, मो. 07465555600

विपल बीरडिया
सहायक, मो. 094140-58289

लखित नाथावल
सहायक, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिलीप
कैप्टेन गुरविन्दर सिंह
मो. 09314142309

चण्डीगढ़

श्रीराम पंसेरी
मो. 09870-127660

हरियाणा

धर्षवीर सिंह
मो. 09330308477

समथल प्रदेश

अशोक शर्मा
मो. 07582574022

उत्तर प्रदेश

गिरजेश शर्मा
मो. 09412448209

उत्तराखण्ड

श्री. एच. डिबारी
मो. 09411103390

छत्तीसगढ़

आर. श्री. द्विवेदी
मो. 09758299230

गुजरात

धीरज जे. पंचवाल
मो. 09428600409

सहाराण्ट

संजीव शुक्ला
मो. 09821290221

कर्नाटक

संकेतारामन कृष्णामूर्ति
मो. 09330966339

राजस्थान

पी. एन. शर्मा
मो. 09413389665

क्रमांक

To

The Hon'ble Governor,
State of Punjab,
Raj Bhawan, sector-6, Chandigarh.

दिनांक : 29.01.2020

PETITION UNDER ARTICLE-192

Respected Sir,

It is my humble submission that on 17-01-2020 the Assembly of the State of Punjab has passed a resolution against the Citizenship Amendment Act-2019. News clip of The Times of India dated 18-01-2020 is annexed herewith. Before this episode, Honorable Chief Minister Mr. Amarinder Singh had declared categorically that CAA-2019 will not be implemented in the state of Punjab. This is a clear disobedience of the Indian Constitution. This is an open revolt of an elected State Govt. and some of its elected MLAs against a duly elected Central Govt. You Goodself should have protected the Constitution and the Federal Structure of India by dismissing the State Govt. through the use of powers under Article 356.

The above action of the Head of State Govt and some of elector MLAs of State Assembly is extremely painful, dangerous, unconstitutional, against the unity and integrity of the nation and a part and parcel of the conspiracy to aggravate the communal disharmony. This is an intentional and malafide misuse of state Assembly against the duly elected central Govt. by making it unstable, to spread hatred against the duly elected central Govt., to spread communal riots in the country and to make our country unnecessarily shameful in the international arena. Crores of nationalist citizens are watching this dirty game helplessly. As Pakista Army gives coverage fire to facilitate the illegal entry of trained terrorists on border in the same way the state Assemblies (through passing unconstitutional Bill against Central Govt. by breaching the oath of office and violating constitutional provisions) are being misused to give protection to some handful of anti nationals engaged in activities like anarchy, disintegration, spreading communal hatred etc. Constitutional experts are also of the view that passing of Bill by a state Assembly against a central ACT is a prima-facie unconstitutional act and if it is not stopped immediately, it will lead to the disintegration of the country.

It is an open fact that the acts of Honorable Chief Minister Mr. Amarinder Singh, Honorable Speaker Mr. Rana K. P. Singh, Honorable Chief whips of different parties and all the MLAs voting in favour of the above unconstitutional Bill against CAA-2019 are categorically in violation of oath of office taken under Article 173 and 188 in accordance with format given in proviso VII-A and B of Schedule-3. It is also a violation of Art. 5 to 11 and 246 of the Constitution. Constitutional duties mentioned in Article 51A(a),(c) and (d) are also violated. It is absolutely essential that such type of public representatives should be brought to book. Their membership should be terminated immediately and they should be punished under relevant sections of the Indian penal code.



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, लिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058

(पंजीकृत कार्यालय : ज, लखन - नै, प्रोद्योग, नरपुर)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द जैन
संरक्षक (पूर्व न्यायाधीश)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व जेजर जनरल)

माननीय श्री रामदयाल गोयल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजगंधारी
सहायकार, मो. 098290-78682

पारानर नारायण शर्मा
अध्यक्ष, मो. 0941733-89665

डॉ महावीर सिंह बाघवत
सहायक, मो. 07665555400

विमल बीरविद्या
सहायक, मो. 094140-58289

ललित चाधक
सहायक, मो. 094140-95268

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिलीप

कैप्टन सुरबिन्दर सिंह
मो. 09334142209

अपनीपद

श्रीराम पंजारी
मो. 09870127963

हरिकाश

धरवीर सिंह
मो. 0983608877

मणजरीश

अशोक शर्मा
मो. 07552576022

जगत प्रोश

शिवजेश शर्मा
मो. 09412443299

सौ. एच. डिबारी

मो. 09411102990

कृतीपद

आर. सी. द्विवेदी
मो. 09732992239

मुजान

धीरज जे. पंजारी
मो. 09432800409

महानन्द

संजीव शुक्ला
मो. 09821349321

कल्पितक

सौ. कटारामन कृष्णापूर्ति
मो. 09528966339

राजेश्वर

पी. एन. शर्मा
मो. 09413389665

क्रमांक

दिनांक :

We can say after reading out the various judgments passed by Honorable Supreme court and different High Courts on the sanctity of oath of office that in all these Judgments the judiciary has taken it very seriously and has termed the violation or the breach of constitutional oath of office as a "betrayal of faith" and has categorically directed that "breach of oath requires a termination of the tenure of office." It has also been observed repeatedly that under Article 102, 103, 191, and 192 the President of India or the Governor of State is the competent authority respectively for the termination of membership of MP or MLA. In this regard, the judgment given by the full bench of Kerala High Court on 19 August 1985 in the matter of K.C. Chandy v/s R. Balakrishna Pillai is completely relevant. Kindly have a perusal of binding directions given in Para-7 and 9 of the Judgment:-

Para-7 "Breach of oath may thus be a betrayal of faith. The appointing authority the Governor, in such cases, can consider whether there was, in fact, any breach of oath. It is not for this Court to embark on any such enquiry."

Para-9 "Breach of oath requires a termination of the tenure of office. This power can be exercised by the appointing authority under the Constitution, and according to the procedure, if any, prescribed therein. The termination of that tenure is not the function of a court; and it would not be appropriate to exercise jurisdiction under Article 226 in such cases. Proceedings under Article 226 in such cases do not lie."

The above judgment has been again completely approved by the same Karali High court on 24-11-2017 in the matter of Alappey Asharaf V/s Chief Minister and others.

Your goodself may also have perusal of the following leading judgments of the Honorable Supreme Court. Binding directions and observations of the Apex Court in these judgments will certainly help your goodself in making up your mind that:-

- Your goodself is constitutionally duty bound to take a decision on the above complaint, and
- Your goodself is constitutionally duty bound to take an advice of the Election commission of India in this regard.

Cases-

- B.R. Kapur v/s state of T.N. and another (2001) 7 SCC 231
- Amarinder Singh v/s special Committee, Punjab Vidhan Sabha and other (2010) 6 SCC 113
- Brundaban Nayak v/s Election Commission 12-02-1965 AIR 1892, 1965 SC (3)53 any citizen is entitled to complain. -Const. Bench
- Election commission of India & Another v/s Dr Subramanian Swamy an another 23-04-1996 CANO504 (NC) 1994.
- Election Commission of India v/s N. G. Ranga 1978 AIR 1609, 1979 SCR (3) 210. -Const. Bench

Handwritten signature



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058
(संकेत कार्यालय : 39, रामनगर -बी, इंदौर, मध्य प्रदेश)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द जैन
संरक्षक (पूर्व व्यावधिपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोयल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजभानी
साहाय्यकर, मो. 098290-78682

पाराशर भाराधरा शर्मा
अध्यक्ष, मो. 094133-89665

डॉ. महावीर सिंह भाखावात
महामंत्री, मो. 07665555600

विमल चौरीदिया
महामंत्री, मो. 094140-58289

ललित भाखावात
सहाय्यकर, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रवेशाध्यक्ष :-

दिलीपी
कैप्टन गुरविन्दर सिंह
मो. 09314142809

अमरीश्वर
श्रीराम पंसेरि
मो. 09876127663

हरिष्वाला
धर्मेन्द्र सिंह
मो. 09333084877

मध्यप्रदेश
अशोक शर्मा
मो. 07502774032

उत्तर प्रदेश
गिरजेश शर्मा
मो. 09412445249

उत्तराखण्ड
सी. एम. डिग्गी
मो. 09411103390

छत्तीसगढ़
आर. सी. टिक्वेरी
मो. 09752592233

गुजरात
धीरज जे. पंचवाल
मो. 09428400409

महाराष्ट्र
संजीव शुक्ला
मो. 09821240321

कर्नाटक
डॉक्टर रामन कुम्भापति
मो. 09538966339

राजस्थान
पी. एन. शर्मा
मो. 09413389660

क्रमांक

दिनांक :

PRAYERS

On the basis of the above submissions, our prayers are-

(A) Kindly take an action and terminate the membership of all MLAs including CM, Speaker of Assembly and Chief whips of different Parties who have breached their Oath of office by managing and voting against CAA-2019 on the floor of the House.

OR IN THE ALTERNATIVE,


(B) Kindly take an action and terminate the membership of the :-

- Chief Minister Mr. Amarinder Singh who has breached the Oath of office by openly declaring that the Govt. of Punjab will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly,
- Speaker MR. Rana K.P. Singh who breached the Oath of office managing in all manners the passing of a Bill against the CAA in the Assembly,
- Chief whips of different Parties in the State Assembly who breached the Oath of office by managing the consent of all the Congress MLA on the bill against the CAA-2019, using duress of action under Ant Defection Act, through issuance of whip.

OR IN THE ALTERNATIVE,

(C) Kindly take an action and terminate the membership of Mr. Mr. Amarinder Singh, Chief Minister, who has breached the Oath of office by openly declaring that the Govt. of Punjab will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly.

Yours sincerely,


Parshar Narayan, President



समता आन्दोलन समिति (रजि.)

प्रांतीय कार्यालय : जी-3, संगम रेजीडेंसी, प्लॉट नं. 9-10, गंगाराम की बागी, वैशाली नगर, जयपुर

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पान्वाचन्द जैन
संरक्षक (पूर्व न्यायाधिपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजस्वामी
सहायका, फोन. 098290-78682

पारजतर नारायण शर्मा
अध्यक्ष, फोन. 094133-89665

विमल चौरडिया
सहायिका, फोन. 094140-58289

रुक्मिणी चावण
सहायिका, फोन. 094140-95368

प्रांतीय उपाध्यक्ष एवं
पदेन सम्भागीय अध्यक्ष :-

जयपुर
प्रविराज राठी
फोन. 9694348039

अजमेर
एन. पी. जगमोहन
फोन. 9414008416

बीकानेर
आई. पी. सोनी
फोन. 9414139621

भारतपुर
हेमराज गोपाल
फोन. 9460926850

जोधपुर
प्रहलाद सिंह राठी
फोन. 9414085447

समेरा
डॉ. अनिल शर्मा
फोन. 9414662244

उदयपुर
सुधा सिंह सुब्रह्मण्यम
फोन. 9571875488

क्रमांक
To

The Hon'ble Governor,
State of Rajasthan,
Raj Bhawan, Jaipur (Raj.)

दिनांक : 29.01.2020

PETITION UNDER ARTICLE-192

Respected Sir,

It is my humble submission that on 25-01-2020 the Assembly of the State of Rajasthan has passed a resolution against the Citizenship Amendment Act-2019 News clip of The Times of India dated 26-01-2020 is annexed herewith. Before this episode, Honorable Chief Minister Mr. Ashok Gehlot had declared categorically that CAA-2019 will not be implemented in the state of Rajasthan. News Clips of Rashtrdoot and Rajasthan Patrika dated 23-12-2019 are being annexed herewith This is a clear disobedience of the Indian Constitution. This is an open revolt of an elected State Govt. and some of its elected MLAs against a duly elected Central Govt Your Goodself should have protected the Constitution and the Federal Structure of India by dismissing the State Govt. through the use of powers under Article 356.

The above action of the Head of State Govt and some of elected MLAs of State Assembly is extremely painful, dangerous, unconstitutional, against the unity and integrity of the nation and a part and parcel of the conspiracy to aggravate the communal disharmony. This is an intentional and mala fide misuse of state Assembly against the duly elected central Govt. by making it unstable, to spread hatred against the duly elected central Govt., to spread communal riots in the country and to make our country unnecessarily shameful in the international arena. Crores of nationalist citizens are watching this dirty game helplessly. As Pakistan Army gives coverage fire to facilitate the illegal entry of trained terrorists on border in the same way the state Assemblies (through passing unconstitutional Bill against Central Govt. by breaching the oath of office and violating constitutional provision are being misused to give protection to some handful of anti nationals engaged activities like anarchy, disintegration, spreading communal hatred etc. Constitutional experts are also of the view that passing of Bill by a state Assembly against a central ACT is a prima-facie unconstitutional act and if it is not stopped immediately, it will lead to the disintegration of the country.

It is an open fact that the acts of Honorable Chief Minister Mr. Ashok Gehlot, Honorable Speaker Mr. C.P. Joshi, Honorable Chief whip of Congress & Mahesh Joshi and all the MLAs voting in favour of the above unconstitutional Bill against CAA-2019 are categorically in violation of oath of office taken under Article 173 and 188 in accordance with format given in proviso VII-A and B of Schedule-3 is also in violation of Art. 5 to 11 and 246 of the Constitution. Constitutional duties mentioned in Article 51A(a),(c) and (d) are also violated. It is absolutely essential that such type of public representatives should be brought to book. Their membership

(Handwritten signature)



समता आन्दोलन समिति (रजि.)

प्रांतीय कार्यालय : जी-3, संगम रेजीडेंसी, प्लॉट नं. 9-10, गंगाराम की बाड़ी, वैशाली नगर, जयपुर

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द्र जैन
संरक्षक (पूर्व न्यायाधियति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजरधानी
साक्षात्कार, फों. 098290-78682

पारशर नारायण शर्मा
अध्यक्ष, फों. 094133-89665

चिन्मल चौरीदिया
सहसचिव, फों. 094140-58289

ललित शास्त्रा
कोषाध्यक्ष, फों. 094140-95368

प्रांतीय उपाध्यक्ष एवं
पदेन सभाभागीय अध्यक्ष :-

जयपुर
अधिराज राठी
फों. 9694348039

अजमेर
एच. के. डायट
फों. 9414008416

बीकानेर
वाई. के. सोनी
फों. 9414139621

भारतपुर
हेमराज गोपाल
फों. 9460926850

जोधपुर
प्रहलाद सिंह राठी
फों. 9414085447

बांसवाड़ा
डॉ. अनिल शर्मा
फों. 9414662344

जयपुर
तुषार सिंह बूधवाराम
फों. 9571875488

क्रमांक :

should be terminated immediately and they should be punished under relevant sections of the Indian penal code.

We can say after reading out the various judgments passed by Honorable Supreme court and different High Courts on the sanctity of oath of office that in a these Judgments the judiciary has taken it very seriously and has termed th violation or the breach of constitutional oath of office as a "betrayal of faith" an has categorically directed that "breach of oath requires a termination of the tenur of office." It has also been observed repeatedly that under Article 102, 103, 191, an 192 the President of India or the Governor of State is the competent authorit respectively for the termination of membership of MP or MLA. In this regard, th judgment given by the full bench of Kerala High Court on 19 August 1985 in th matter of K.C. Chandy v/s R. Balakrishna Pillai is completely relevant. Kindly have perusal of binding directions given in Para-7 and 9 of the Judgment:-

Para-7 "Breach of oath may thus be a betrayal of faith. The appointing authorit the Governor, in such cases, can consider whether there was, in fact, a breach of oath. It is not for this Court to embark on any such enquiry."

Para-9 "Breach of oath requires a termination of the tenure of office. This pow can be exercised by the appointing authority under the Constitution, ar according to the procedure, if any, prescribed therein. The termination that tenure is not the function of a court; and it would not be appropriate exercise jurisdiction under Article 226 in such cases. Proceedings und Article 226 in such cases do not lie."

The above judgment has been again completely approved by the same Kara High court on 24-11-2017 in the matter of Alappey Asharaf V/s Chief Minister a others.

Your goodself may also have perusal of the following leading judgments of t Honorable Supreme Court. Binding directions and observations of the Apex Court these judgments will certainly help your goodself in making up your mind that:-

- Your goodself is constitutionally duty bound to take a decision on the abo complaint, and
- Your goodself is constitutionally duty bound to take an advice of the Electi commission of India in this regard.

Cases-

- B.R. Kapur v/s state of T.N. and another (2001) 7 SCC 231
- Amarinder Singh v/s special Committee, Punjab Vidhan Sabha and oth (2010) 6 SCC 113
- Brundaban Nayak v/s Election Commission 12-02-1965 AIR 1892, 1965 5 (3)53 any citizen is entitled to complain. -Const. Bench
- Election commission of India & Another v/s Dr Subramaniam Swamy ; another 23-04-1996 CAN0504 (NC) 1994.

Handwritten signature



समता आन्दोलन समिति (रजि.)

प्रांतीय कार्यालय : जी-3, संगम रेजीडेन्सी, प्लॉट नं. 9-10, गंगाराम की हाजी, वैशाली नगर, जयपुर

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पान्नाचन्द जैन
संरक्षक (पूर्व न्यायाधिपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजस्थानी
सल्लाहकार, मो. 098290-78682

पाराशर नारायण शर्मा
अध्यक्ष, मो. 094133-89665

विमल चौरीया
धारापिन, मो. 094140-58289

स्वतिल चावण
कोषाध्यक्ष, मो. 094140-95368

प्रांतीय उपाध्यक्ष एवं
पदेन सम्भागीय अध्यक्ष :-

जयपुर
अधिराज राठी
मो. 9694348039

अजमेर
एन. बी. प्रसाद
मो. 9414008416

बीकानेर
आई. बी. पांगी
मो. 9414139621

भारतपुर
हेमराज गोपाल
मो. 9460928850

कोचलूर
प्रकाश सिंह राठी
मो. 9414085447

वांटा
डॉ. अजित शर्मा
मो. 9414662344

अजमेर
दुल्हा सिंह चुनवाल
मो. 9571875488

क्रमांक

5. Election Commission of India v/s N. G. Ranga 1978 AIR 1609, 1979 SCR (1) 210. -Const. Bench

दिनांक :

PRAYERS

On the basis of the above submissions, our prayers are-

(A) Kindly take an action and terminate the membership of all MLAs including CM, Speaker of Assembly and Chief whip of Congress Party who have breached their Oath of office by managing and voting against CAA-2019 on the floor of the House.

OR IN THE ALTERNATIVE,


(B) Kindly take an action and terminate the membership of the :-

- Chief Minister MR. Ashok Gehlot who has breached the Oath of office by openly declaring that the Govt. of Rajasthan will not permit the CAA-2019 to be implemented in the State and further by managing it in all manners the passing of a Bill against the CAA-2019 in the Assembly,
- Speaker MR. C.P. Joshi who breached the Oath of office managing in all manners the passing of a Bill against the CAA in the Assembly,
- Chief whip of the Congress Party in the State Assembly MR. Mahesh Joshi who breached the Oath of office by managing the consent of the Congress MLAs on the bill against the CAA-2019, using duress action under Anti Defection Act, through issuance of whip.

OR IN THE ALTERNATIVE,

(C) Kindly take an action and terminate the membership of Mr. Ashok Gehlot Chief Minister, who has breached the Oath of office by openly declaring that the Govt. of Rajasthan will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly.

Yours sincerely,


Parshar Narayan, President



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058

(पंजीकृत कार्यालय - 39, रामनगर, प्रेमनगर, मुम्बई)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री धानाचन्द्र जैन
संरक्षक (पूर्व न्यायविधि विभाग)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल मोघल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भार्गव शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री इकराम राजारथानी
सलाहकार, मो. 098290-78682

पारलर भाराधरा शर्मा
अध्यक्ष, मो. 094133-89665

डॉ महावीर सिंह साधागत
सहायक, मो. 07665555600

विमल चौरीदिया
सहायक, मो. 094140-58289

ललित साधागत
सहायक, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिलीप
कैफ़ेन पुरविधि सिंह
मो. 09314142009

चण्डीगढ़

श्रीराम पंसारि
मो. 09679127680

हरियाणा

धर्मवीर सिंह
मो. 09305084877

मध्य प्रदेश

अशोक शर्मा
मो. 07502579422

उत्तर प्रदेश

गिरवेश शर्मा
मो. 09413445209

उत्तराखण्ड

सी. एच. डिपरी
मो. 09411183880

छत्तीसगढ़

आर. सी. द्विवेदी
मो. 09752392220

पूजापुर

धीरज जे. पंचाल
मो. 09430400409

महाराष्ट्र

संजीव शुक्ला
मो. 09821940321

कर्नाटक

वीकटरमनन कुमाराप्पुति
मो. 09309966239

राजस्थान

पी. एन. शर्मा
मो. 09913289663

क्रमांक

To

The Hon'ble Governor,
State of West Bengal, Raj Bhawan,
Marx Engels Beethi Rd, Kolkata.

दिनांक :

29.01.2020

PETITION UNDER ARTICLE-192

Respected Sir,

It is my humble submission that on 27-01-2020 the Assembly of the State of West Bengal has passed a resolution against the Citizenship Amendment Act-2019 News clip of The Rajasthan Patrika dated 28-01-2020 is annexed herewith. Before this episode, Honorable Chief Minister Ms.Mamta Banerjee had declared categorically that CAA-2019 will not be implemented in the state of West Bengal This is a clear disobedience of the Indian Constitution. This is an open revolt of an elected State Govt. and some of its elected MLAs against a duly elected Central Govt Your Goodself should have protected the Constitution and the Federal Structure of India by dismissing the State Govt. through the use of powers under Article 356.

The above action of the Head of State Govt and some of elected MLAs of State Assembly is extremely painful, dangerous, unconstitutional, against the unity and integrity of the nation and a part and parcel of the conspiracy to aggravate the communal disharmony. This is an intentional and malafide misuse of state Assembly against the duly elected central Govt. by making it unstable, to spread hatred against the duly elected central Govt., to spread communal riots in the country and to make our country unnecessarily shameful in the international arena Crores of nationalist citizens are watching this dirty game helplessly. As Pakista Army gives coverage fire to facilitate the illegal entry of trained terrorists on border in the same way the state Assemblies (through passing unconstitutional Bill against Central Govt. by breaching the oath of office and violating constitutional provisions are being misused to give protection to some handful of anti nationals engaged in activities like anarchy, disintegration, spreading communal hatred etc. Constitutional experts are also of the view that passing of Bill by a state Assembly against a central Act is a prima-facie unconstitutional act and if it is not stopped immediately, it will lead to the disintegration of the country.

It is an open fact that the acts of Honorable Chief Minister Ms. Mamta Banerjee, Honorable Speaker Biman Banerjee, Honorable Chief whips of different parties and all the MLAs voting in favour of the above unconstitutional Bill against CAA-2019 are categorically in violation of oath of office taken under Article 173 and 188 in accordance with format given in proviso VII-A and B of Schedule-3. It is also a violation of Art. 5 to 11 and 246 of the Constitution. Constitutional duties mentioned in Article 51A(a),(c) and (d) are also violated. It is absolutely essential that such type of public representatives should be brought to book. Their membership should be terminated immediately and they should be punished under relevant sections of the Indian penal code.



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 को पास, नई दिल्ली - 110058

(पंजीकृत कार्यालय : 29, चमन - नै, जंटाबाग, गुरुकु)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाबन्द जैन
संरक्षक (पूर्व न्यायाधीशपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामदयाल गोयल
संरक्षक (पूर्व आई. पी. एन.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एन.)

श्री इकराम राजस्वामी
सलाहकार, मो. 098290-78682

पाराशर नारायण शर्मा
अध्यक्ष, मो. 094133-89665

डाँ महवीर सिंह माधवावल
सहायक, मो. 07665555600

विलास श्रीरंगदा
सहायक, मो. 094140-58289

सतीश भावाण
कोषाध्यक्ष, मो. 094140-95348

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिलीप
कैप्टन गुरविन्दर सिंह
मो. 09114142309

मनदीप

श्रीराम पंसाठी
मो. 09870127863

हरिकाण
धर्मवीर सिंह
मो. 0933008477

मधुप्रदेश
अशोक शर्मा
मो. 07582374022

जगत प्रदेश
गिरवेश शर्मा
मो. 0912440249

जयलक्ष्मण
सी. एम. द्विवेदी
मो. 09411103390

समीराम

आर. सी. द्विवेदी
मो. 09732992330

मुकेश

धीरज जे. पंचवाल
मो. 09428600409

महाराष्ट्र
संजीव शुक्ल
मो. 09821396321

समीरक
श्रीकान्तमन कृष्णाधुर्ति
मो. 0933994339

राजस्थान
पी. एन. शर्मा
मो. 09413399660

क्रमांक

दिनांक :

We can say after reading out the various judgments passed by Honorable Supreme court and different High Courts on the sanctity of oath of office that in all these judgments the judiciary has taken it very seriously and has termed the violation of the breach of constitutional oath of office as a "betrayal of faith" and has categorically directed that "breach of oath requires a termination of the tenure of office." It has also been observed repeatedly that under Article 102, 103, 191, and 192 the President of India or the Governor of State is the competent authority respectively for the termination of membership of MP or MLA. In this regard, the judgment given by the full bench of Kerala High Court on 19 August 1985 in the matter of K.C. Chandu v/s R. Balakrishna Pillai is completely relevant. Kindly have a perusal of binding directions given in Para-7 and 9 of the Judgment:-

Para-7 "Breach of oath may thus be a betrayal of faith. The appointing authority the Governor, in such cases, can consider whether there was, in fact, any breach of oath. It is not for this Court to embark on any such enquiry."

Para-9 "Breach of oath requires a termination of the tenure of office. This power can be exercised by the appointing authority under the Constitution, according to the procedure, if any, prescribed therein. The termination of that tenure is not the function of a court; and it would not be appropriate to exercise jurisdiction under Article 226 in such cases. Proceedings under Article 226 in such cases do not lie."

The above judgment has been again completely approved by the same Karal High court on 24-11-2017 in the matter of Alapey Ashraf V/s Chief Minister and others.

Your goodself may also have perusal of the following leading judgments of the Honorable Supreme Court. Binding directions and observations of the Apex Court in these judgments will certainly help your goodself in making up your mind that:-

- (a) Your goodself is constitutionally duty bound to take a decision on the above complaint, and
- (b) Your goodself is constitutionally duty bound to take an advice of the Election Commission of India in this regard.

Cases-

1. B.R. Kapur v/s state of T.N. and another (2001) 7 SCC 231
2. Amarinder Singh v/s special Committee, Punjab Vidhan Sabha and other (2010) 6 SCC 113
3. Brundaban Nayak v/s Election Commission 12-02-1965 AIR 1892, 1965 SC (3)53 any citizen is entitled to complain. -Const. Bench
4. Election commission of India & Another v/s Dr Subramaniam Swamy and another 23-04-1996 CANOS04 (NC) 1994.
5. Election Commission of India v/s N. G. Ranga 1978 AIR 1609, 1979 SCR (3) 210. -Const. Bench

by: [Signature]



समता आन्दोलन समिति (रजि.)

राष्ट्रीय कार्यालय : 18/2 -A, प्रेम नगर, जनकपुरी, तिलक नगर मेट्रो स्टेशन गेट नं. 4 के पास, नई दिल्ली - 110058

(पंजीकृत कार्यालय : 24, रामलाल - रोड, इंदौर, मध्य प्रदेश)

Website : www.samtaandolan.co.in

Email : samtaandolan@yahoo.in

माननीय श्री पानाचन्द्र जैन
संरक्षक (पूर्व न्यायाधीपति)

माननीय श्री अशोक कुमार सिंह
संरक्षक (पूर्व मेजर जनरल)

माननीय श्री रामप्रकाश गोपाल
संरक्षक (पूर्व आई. पी. एस.)

माननीय श्री भागीरथ शर्मा
संरक्षक (पूर्व आई. ए. एस.)

श्री सुकराम राजभास्वी
सहायकार, मो. 098290-78682

पाराशर भाराधरा शर्मा
अध्यक्ष, मो. 094133-89665

डॉ महावीर सिंह साक्षात्
कार्मिक, मो. 07665555600

विमल खौरडिया
सहायक, मो. 094140-58289

ललित साक्षात्
कार्मिक, मो. 094140-95368

राष्ट्रीय उपाध्यक्ष एवं
पदेन प्रदेशाध्यक्ष :-

दिल्ली
कैप्टन गुरबिन्दर सिंह
मो. 09134142009

बंगलौर
श्रीराम पंधारी
मो. 09876127663

हरियाणा
धर्मवीर सिंह
मो. 09352648877

मध्यप्रदेश
अशोक शर्मा
मो. 07582574022

उत्तर प्रदेश
गिरिजेश शर्मा
मो. 09412448289

उत्तराखण्ड
सी. एम. डिपती
मो. 09411533280

छत्तीसगढ़
अर. सी. द्विवेदी
मो. 09732892230

गुजरात
धीरज जे. पंचाल
मो. 09428400409

महाराष्ट्र
संजीव शुक्ला
मो. 09821740321

कर्नाटक
चैकटरमनन कृष्णामूर्ति
मो. 09328966339

राजस्थान
पी. एन. शर्मा
मो. 09413289683

क्रमांक :

दिनांक :

PRAYERS

On the basis of the above submissions, our prayers are-

(A) Kindly take an action and terminate the membership of all MLAs including CM, Speaker of Assembly and Chief whips of different Parties who have breached their Oath of office by managing and voting against CAA-2019 on the floor of the House.

OR IN THE ALTERNATIVE,

(B) Kindly take an action and terminate the membership of the :-

- Chief Minister Ms. Mamata Banerjee who has breached the Oath of office by openly declaring that the Govt. of West Bengal will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly,
- Speaker MR. Biman Banerjee who breached the Oath of office managing in all manners the passing of a Bill against the CAA in the Assembly,
- Chief whips of different Parties in the State Assembly who breached the Oath of office by managing the consent of all the Congress MLA: on the bill against the CAA-2019, using duress of action under Ant Defection Act, through issuance of whip.

OR IN THE ALTERNATIVE,

(c) Kindly take an action and terminate the membership of Ms. Mamata Banerjee, Chief Minister, who has breached the Oath of office by openly declaring that the Govt. of West Bengal will not permit the CAA-2019 to be implemented in the State and further by managing in all manners the passing of a Bill against the CAA-2019 in the Assembly.

Yours sincerely,

Parshar Narayan, President