

In the Hon'ble Supreme Court of India, New Delhi

Letter Petition (PIL) No- of 2023
Amitabh Thakur Petitioner

Versus

State of Uttar Pradesh and others Respondents

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Lucknow
Dated- 17/04/2023

(Amitabh Thakur)
Petitioner In Person
9415534526

In the Hon'ble Supreme Court of India, New Delhi

Letter Petition (PIL) No- of 2023
Amitabh Thakur Petitioner

Versus

State of Uttar Pradesh and others Respondents

LIST OF DATES AND EVENTS

S No	Date	Event
1.	March 2017	Current Chief Minister of Uttar Pradesh assumes power
2.	24/02/2023	Umesh Pal murder took place
3.	25/03/2023	Chief Minister declares in UP Assembly "Mitti me mila dunga"
4.	06/03/2023	First encounter in Umesh Pal case
5.	28/03/2023	Atiq Ahmad's Petition for protection of life dismissed by this Hon'ble Court
6.	27/03/2023	Atiq Ahmad brought to Uttar Pradesh
7.	30/03/2023	Atiq Ahmad sent back to Sabarmati jail
8.	12/04/2023	Atiq Ahmad and Ashraf brought to UP
9.	13/04/2023	Police custody grant of Atiq, brother
10.	13/04/2023	Atiq Ahmad's son encounter
11.	14/04/2023	murder of Atiq Ahmad, brother

By means of this letter petition, the petitioner is invoking the extraordinary jurisdiction of this Hon'ble Court vested with it through Article 32 of the Constitution to file this Public Interest Litigation

(PIL, for short) Letter Petition to pray before this Hon'ble Court to kindly direct the concerned respondents to take cognizance of the petitioner's representation dated 16/04/2023 (Annexure No 1) and to accordingly direct the State of Uttar Pradesh to transfer FIR No 37/2023 u/s 302, 307 IPC, sections 3, 7, 25, 27 Arms Act and section 7 o Criminal Law Amendment Act registered on 16/04/2023 at Thana Shahganj, district Prayagraj against accused Lovelesh Tiwari, Sunny Singh, and Arun Maurya in murder of Atiq Ahmad and his brother Ashraf in the night of 15/04/2023, to Central Bureau of Investigation (CBI, for short), for the facts being stated herein after, as prayed in the above representation dated 16/04/2023.

Hence this PIL in form of Letter petition.

Lucknow
Dated- 17/04/2023

(Amitabh Thakur)
Petitioner In Person
9415534526

In the Hon'ble Supreme Court of India, New Delhi

Letter Petition (PIL) No- _____ of 2023

Amitabh Thakur, aged about 55 years, s/o Sri T N Thakur, r/o 5/426,
Viram Khand, Gomti Nagar, Lucknow ----- Petitioner

Versus

1. State of Uttar Pradesh through Additional Chief Secretary,
Home Department, Civil Secretariat, Lucknow
2. Director General of Police, Uttar Pradesh, Lucknow
3. Union of India through Ministry of Personnel and Training,
Government of India, New Delhi
4. Central Bureau of Investigation, New Delhi

----- Respondents

Writ Petition under Article 32 of the Constitution of India

To,

The Hon'ble Chief Justice of India and His other Hon'ble companion Judges of the aforesaid Court:

The humble petition of the above named petitioner most respectfully begs to submit as under:

1. That by means of this petition, the petitioner is invoking the extraordinary jurisdiction of this Hon'ble Court vested with it through Article 32 of the Constitution to file this Public Interest Litigation (PIL, for short) in the form of Letter Petition to pray before this Hon'ble Court to kindly direct the concerned respondents to take cognizance of the petitioner's representation dated 16/04/2023 and to accordingly direct the State of Uttar Pradesh to transfer FIR No 37/2023 u/s 302, 307 IPC, sections 3, 7, 25, 27 Arms Act and section 7 of Criminal Law Amendment Act registered on 16/04/2023 at Thana Shahganj, district Prayagraj against accused Lovelesh Tiwari, Sunny Singh, and Arun Maurya in murder of Atiq Ahmad and his brother Ashraf in the night of 15/04/2023, to Central Bureau of Investigation (CBI, for short), for the facts being stated herein after, as prayed in the above representation dated 16/04/2023. A copy of the petitioner's representation dated 16/04/2023 is being attached as Annexure No 1, while the petitioner is not being able to present a copy of the FIR as it has not been loaded on the CCTNS website of Uttar Pradesh Police as yet.
2. The petitioner declares that he has not filed any other Writ petition before the Hon'ble Supreme Court and Hon'ble High Court

either at Allahabad or its Lucknow bench pertaining to the subject matter and/ or for the relief prayed for in the instant writ petition. It is further declared that in respect of the same subject, no caveat notice has been received by the petitioner.

3. That this being a PIL, the petitioner finds it relevant to present some facts regarding his own credibility. He is a retired IPS officer, a social and political activist, working primarily in the field of transparency and accountability in public life. After his retirement from service, he is presently working as the National President of an unregistered political party, Adhikar Sena, presently in the process of getting registered, whose primary goals are to work against Anyay, Atyachar and Bhrashtachar and for the rights (Adhikar) of the citizen.
4. That the public cause this PIL is seeking to espouse through this Writ Petition is to bring the truth of the extremely contentious murder case of Atiq Ahmad and his brother Ashraf as took place in the night of 15/04/2023. It is a well-known fact that Atiq Ahmad was universally known and acknowledged as a mafia, a dreaded criminal and a gangster. It is also true that he was always cited as one of the worst representatives of politico-criminal linkage in the State of Uttar Pradesh, as having entered politics and as also having succeeded in getting elected to Lok Sabha and Vidhan Sabha on more than one occasions, while having his own, for reasons best known to the psychological understanding of Indian masses. It is also true that only recently he had been convicted for rigorous life imprisonment in an extremely gruesome and

horrendous case. In short, he was a person about whom it can be almost safely said that he generally carried an extremely bad and negative public image in general masses, except his own followers. His brother Ashraf did not carry any different image and was generally regarded as an assistant of Atiq Ahmad. In short, these are not the persons whose murder would ordinarily have been a matter for bringing a PIL before this Hon'ble Court. PILs on individual murder cases are even otherwise not generally entertained. But there are many facts and figures that make this murder extremely unique and distinct and make it a matter of larger Public Interest, which has many important ramifications for public life, governance and the entire edifice of law and justice.

5. That for this the petitioner needs to go slightly deeper into the chronology of events leading to these murders. It is that the current Chief Minister (CM, for short) of UP, Sri Yogi Adityanath took command of the State in March 2017. While Atik Ahmad was a dreaded mafia and gangster for years, the current CM made it his point to mention and name Atik Ahmad along with a few other known gangster/mafia like Mukhtar Ansari as the men who need to be tamed. His words soon got converted into rhetoric, then to ritual, then to slogan and then to the State policy of Government of UP. While the CM tried to make his words look like being value neutral and unbiased, being aimed to one and all gangsters and mafia, but the mention of the names and the way he and his Government went after a selected few mafia/gangsters made it clear that there were a few persons, who were the real targets of

the State Government under the current CM's rule. Thus, everything happened primarily only with men like Atik Ahmad and Mukhtar Ansari, whether it was police action or revenue action or action by any other Government department. Thus, the atmosphere of the State Government was slowly and definitely converted into that of being in an open war with the selected mafias like Atik and Mukhtar. This included all out action on all fronts, and gave a very apparent and clear view of these people being the enemies of the State. Since both these persons generally carried extremely poor reputation among the larger masses, it was generally accepted and even praised by the common people, who felt that at last someone has come forward to give justice to these people. At the same time, voices were raised about the State Government being extremely selective and partisan towards the mafia and gangsters, so that the actions seemed to be limited and specifically targeted to a few, while any others being ignored and some even being given open patronage. Many a times, this partisan act was even linked to caste and religion, and started giving the State Government a reputation of being partisan, biased and non-objective in its acts and deeds towards the mafia and gangsters, where it was openly seen that many known gangsters and mafia were living quite comfortably with no action being taken against them even after serious complaints coming against them, while an all out war being waged against a few selective mafias, going to the extent of razing down their houses and buildings. This was also being seen in the action against the gang

members of various gangs, where selective action was all too apparent. The CM also initiated a new regime of encounter raj, where he openly vouched for and called for use of force in taming the criminals and gangsters. This led to thousands of encounters taking place all over the State of UP, which sprung up suddenly in a big way, after coming into power of the current CM, and led to use of words like "Half encounter" where the Police fired on the legs of the criminals and "Full encounter" where the police pierced the chest. The CM, his ministers and the officials of the State Government repeatedly went on releasing data on the number of encounters and the numbers of criminals killed/arrested in this process. As prayed above, it was never officially admitted that these actions were based on any selective or target based considerations, but it was known to one and all, among the public as also among the officials, that the action had to be extremely targeted and selective, where the prime targets were to be Mukhtar Ansari and Atiq Ahmad and in the process, the CM himself took the names of these gangsters on many occasions, as was taken by his party members as the persons who would be taught a lesson.

6. That this dreaded combination of free use of force through open and brazen police encounters along with some persons being declared enemies of the State Government, these persons naturally started fearing for their lives and time and again it came in social media that Atiq Ahmad, Mukhtar Ansari and certain other selective gangsters were praying again and again for their lives,

fearing that they would be killed and eliminated either in jail or in the process of Judicial custody, a fear that had its direct linkage with the highly suspicious killing of another dreaded gangster Vikas Dubey, whose case was closed by the Police and the Judicial Enquiry Commissions, but about whom it is universally believed and accepted that it was a stage-managed murder by the Police, for their own reasons and sense of justice.

7. That it is in this background that the recent set of events started following, when there was an extremely shocking day light murder of Mr Umesh Pal, the prime witness in Raju Pal murder case on 24/02/2023. This murder was attributed to Atik Ahmad gang and the alleged CCTV recording of the event also brought photographs of some of his family members and henchmen being part of the murder operation. A day after this murder, on 25/02/2023, the current CM had used the words "Mitti me mila dunga" for the accused in this murder case in open UP Assembly, whose only meaning was taken to be that the assailants would be killed and driven to earth. This led to a sequence of events where many encounters of the alleged assailants took place. On 27/02/2023, Arbaz, the alleged driver of the vehicle used in Umesh Pal murder was shot down. On 01/03/2023, with UP government's crackdown on encroachments, many properties, belonging allegedly to Atiq's aides, were razed in the state in the month of March. House of Zafar Ahmed, an alleged aide of Atiq's, demolished in Prayagraj. On 02/03/2023, Three bulldozers and another heavy-duty machine were deployed to demolish the two-

storey building under Dhoomanganj police station area in Prayagraj, owned by Safdar Ali, an alleged arms trader linked to Atiq. On 04/03/2023, house of pradhan of Ahmedpur Asrauli village, Noor Zahira, was razed. On 06/03/2023, Vijay Chaudhary, who allegedly fired the first shot at Umesh, was killed in an alleged 'encounter'. On 17/03/2023, Atiq's lawyer, who had asked for an urgent hearing in the Supreme Court for protection to the ex-legislator in Umesh Pal case, sought more time on 28/03/2023, on next date of hearing of Atiq's case, this Hon'ble Court refused relief to Atiq, saying he is in the UP government's protection. On 27/03/2023, Atiq Ahmad was brought to Naini Jail. Prayagraj from Sabarmati Jail, Gujarat, with his saying all the time that he would be killed in Police custody. On 28/03/2023, the learned Trial court held Atiq Ahmed and two others guilty in the Umesh Pal kidnapping case and sentenced them to life imprisonment. This was Atiq's first conviction in over 130 cases against him, the first one being when he was merely 17, and on 30/03/2023, he was taken back to Sabarmati jail. On 12/04/2023, Atiq and brother Ashraf were brought to Prayagraj from Sabarmati and Bareilly jails respectively, in Umesh Pal case. On 13/03/2023, the brothers were produced in learned Trail court and their remand custody was sought and granted till 17 April. On the same day, 13/04/2023, Atiq's son Asad and his aide Ghulam were gunned down by the UP Police in an encounter in Jhansi, in an extremely contentious manner and on next say, 14/03/2023, Atiq and his brother Ashraf were murdered in the most dramatic and

unbelievable manner in the night when coming out of Colvin Hospital, Prayagraj.

8. That the above set of events make it obvious that the murder of Atiq Ahmad and his brother is no ordinary murder of a criminal/mafia in a routine manner, but is a murder that has many angles, many perspectives, ,any latent and inherent questions and issues involved in it.
9. That every one of the acts, right from the extremely partisan and targeted actions aimed particularly at Atiq Ahmad and Mukhtar Ansari, while there being rumours and instances of giving almost open patronage to many other gangsters and mafia in the State, to the use of their names openly and repeatedly by the current CM along with serious threats being uttered in open public speeches by the current CM along with his Ministers and party members, to the use of the words "Mitti me mila dunga" by the Chief Minister in open Assembly exactly in context and reference to the Umesh Pal case to the regular use of extremely dubious and suspicious encounters in the last 07 years during the rule of the current Chief Minister, to the timeline of events after Umesh Pal murder, to the extremely suspicious encounter of Atiq Ahmad's son in Jhansi on 13/04/2023 to the completely unbelievable murder of Atiq and his brother in Police custody, make it clear that this murder can have and seem to have extremely dangerous and hidden portends, which can very well come as being a completely State sponsored act, with the act having been governed and regulated at a very high level.

10. that the alleged encounter killing of Asad, who was wanted in the Umesh Pal murder case, in Uttar Pradesh's Jhansi, is not the only incident where fingers have been pointed at the police as regards selective, targeted and dubious acts. Even the petitioner has raised serious objections to this encounter. He has sent a 12-point complaint to the National Human Rights Commission (NHRC) to look into the alleged illegalities by UP Police in the Asad's encounter. In this complaint, serious objections have been raised about the encounter. These objections include questions such as whether both died on the spot or in the hospital. Pictures of Asad show him lying beneath the handle of the bike, is not possible in the case of an encounter. If the encounter was real, Asad would have been lying over the bike and not under it. The deceased have been shown holding guns in their hands in the picture, which is not possible in an encounter, according to the medico-legal theory. The FIR mentions that Asad and Ghulam were alive when the firing stopped. But from the photographs it is clear that they were dead. Therefore the claim of them being alive and rushed to the hospital via Ambulance is disputed. Asad seems to be holding the pistol in his fist tightly, whereas according to medico legal principles it is not possible to hold the gun while being injured. Asad was lying beneath the handle of the bike which is not possible in case of an encounter. He claimed that logically Asad would have been lying over the bike and not under it. In one photograph the pistol is missing from the hands of Ghulam in one hand while in the other he is holding it comfortably, this raises the

suspicion of it being a planted pistol. Further, it is not possible to hold the pistol the way Ghulam is holding after being injured goes against the medico-legal principles, as in the case of Asad. The "sight of incidence" is an open area and it is not possible to take cover in that area. The bike does not bear the marks of slipping as there is no scratch or any mark, despite the area being a rocky terrain. According to the FIR the encounter ended at 12:55 but the FIR got registered at 11:55, which raises suspicion. The news channels broadcasted the news of the death of the criminals at around 1:00. Whereas the FIR mentions that both of them were alive at that time.

11. That these are few of the serious matters of doubt being raised as regards the Asad encounter.
12. That the murder of Atiq Ahmad and Ashraf raises even more points like-
 - (i) How could it take place in such alleged high security?
 - (ii) Why did the security seem to be slackened at the given point of time?
 - (iii) Why were the Media persons allowed to interact with men in Police custody?
 - (iv) Why was it done when the persons in Police custody were high risk prone and this fact was already on record?
 - (v) Why was the security compromised and the media persons allowed when the accused were in Police custody?
 - (vi) Why did the Police remain almost complacent all through the process?

- (vii) Why did UP Police, otherwise triggerhappy all the time, did not open fire when the actual need came?
- (viii) Why were the alleged media persons not even checked before interaction?

13. That there are many other questions that also emerge like-

- (i) FIR being registered by Police and not by the family members of the deceased.
- (ii) Story of FIR being completely filmy in its context and texture.
- (iii) There being no efforts to take Police custody of the accused
- (iv) The accused sent to jail only after one day of interrogation, in the routine manner.

14. That in short, every thing that seems to be related with Atiq murder seems extremely sketchy, fishy, suspicious. It is also quite obvious that there can be great possibility of the entire murder scheme being a state sponsored exercise, where the high and mighty might be involved, for all kinds of nefarious purposes.

15. That in such circumstances, this case cannot be investigated by local UP Police but needs CBI investigation, under direct monitoring of this Hon'ble Court or the Hon'ble High Court because-

- (i) There is a definite background to murder.
- (ii) The circumstances are extremely suspicious.
- (iii) The circumstances point to high and mighty being involved.

- (iv) It may be a State sponsored murder with men in top positions getting it up.
- (v) Such a possibility is an extremely dangerous one and has extremely dangerous portents and implications, other than having very deep ramifications.
- (vi) These facts can never be brought by the UP Police.
- (vii) Thus there is a need for thorough investigation by CBI under Hon'ble Court supervision.
- (viii) For all the above facts, this is a matter having wide ramifications and huge implications for governance, public life and the entire Democratic edifice, as it no longer is murder of a dreaded Don but has the possibility of massive misuse of public office and public authority for fulfilling personal and political goals and aims, including murdering men through fake encounters and through staged murders in Police custody, which can be played and done again and again, if they remain unattended.

16. That the petitioner had presented these facts before the Uttar Pradesh Government through his representation dated 16/04/2023 (annexure No 1) which he now brings before this Hon'ble Court through this Letter petition, almost immediately because time is of immense value in the given case, as there can be a possibility of the 03 alleged accused getting killed in Judicial custody and the entire truth getting buried forever. Thus, there is an immediate need to act in the given case, as time is of immense value and the matter needs immediate and urgent attention.

17. That despite these repeated pleas, nothing has been done by the State of UP. For all these reasons, in such circumstances, having no any officious and effective alternative remedy in these circumstances, considering the importance of the matter. this writ petition is being filed under Article 226 of the Constitution of India on the following amongst other grounds.

GROUND

- (1) Because the matter is of immense importance.
- (2) Because it has large ramifications.

PRAYER

Wherefore, it is most respectfully prayed that this Hon'ble Court may be pleased to-

- a. kindly issue a Writ in the nature of Mandamus or any other appropriate writ, order or direction to kindly direct the concerned respondents to take cognizance of the petitioner's representation dated 16/04/2023 and to accordingly direct the State of Uttar Pradesh to transfer FIR No 37/2023 u/s 302, 307 IPC, sections 3, 7, 25, 27 Arms Act and section 7 of Criminal Law Amendment Act registered on 16/04/2023 at Thana Shahganj, district Prayagraj against accused Lovelesh Tiwari, Sunny Singh, and Arun Maurya in murder of Atiq Ahmad and his brother Ashraf in the night of 15/04/2023, to Central Bureau of Investigation (CBI, for short), for the facts being

stated herein after, as prayed in the above representation dated
16/04/2023.

- b. kindly issue a Writ in the nature of mandamus or any other
appropriate writ, order or direction in larger public interest

Lucknow
Dated- 17/04/2023

(Amitabh Thakur)
Petitioner In Person
9415534526

Annexure No 1

In the Hon'ble Supreme Court of India, New Delhi

Letter Petition (PIL) No-	of 2023
Amitabh Thakur	Petitioner
Versus	
State of Uttar Pradesh and others	Respondents

सेवा में,
मुख्यमंत्री,
उत्तर प्रदेश,
लखनऊ

विषय-- अतीक अहमद और अशरफ की हत्या के मामले को सीबीआई को संदर्भित किए जाने विषयक

महोदय,

अधिकार सेना निम्न कारणों से कल रात घटित हुए अतीक अहमद और अशरफ की हत्या को सीबीआई को संदर्भित किए जाने की मांग की करती है--

1. हत्यारों द्वारा इतनी सुगमता से पुलिस बल की मौजूदगी में मौके पर आना और हत्या करना
2. प्रशासन द्वारा ही अभियुक्तों को जान का भारी खतरा होने की बात कहने के बाद भी हत्या के समय अभियुक्तों के आस पास बहुत कम पुलिस बल का होना
3. हत्या के समय दोनों अभियुक्तों को काफी असुरक्षित स्थिति में रखा जाना
4. पुलिस कस्टडी में होने के बाद भी पत्रकारों को वार्ता करने का अवसर देना
5. इस वार्ता में इन पत्रकारों को अभियुक्तों के बिल्कुल निकट आने देने का अवसर देना और इस अवसर पर अभियुक्तों को पूरी तरह असुरक्षित छोड़ देना
6. इस अवसर पर कथित पत्रकारों की कोई चेकिंग तक नहीं किया जाना
7. बात बात में एनकाउंटर की बात कहने वाली यूपी पुलिस द्वारा फायरिंग के लाइव मौके पर पूरी तरह निष्क्रिय रहना

8. नियमानुसार किसी की प्राण रक्षा के लिए फायरिंग का कानूनी अधिकार होने के बाद भी पुलिस द्वारा अपनी कस्टडी में मौजूद अभियुक्त की प्राण रक्षा के लिए मौके पर कोई भी आवश्यक जवाबी फायरिंग नहीं करना
9. फायरिंग प्रारंभ होते ही पुलिस द्वारा बहुत तेजी से मौके से पीछे हटना
10. स्थानीय लोगों के बयानों के अनुसार पुलिस द्वारा घटना के पहले मौके को जानबूझ कर खाली कराया जाना
11. चश्मदीद साक्षियों के अनुसार मारने वाले बदमाशों का पुलिस की गाड़ी से आना
12. इस पूरी घटना की पृष्ठभूमि और पिछले दिनों लगातार घट रहे घटनाक्रम के तथ्य

ये समस्त तथ्य यह बताते हैं कि इस हत्या के तार अत्यंत उच्च स्तर से जुड़े हो सकते हैं. जिस प्रकार से यह घटना घटित हुई उससे हत्यारों को पूर्व नियोजित योजना के अंतर्गत राज्य पोषित स्थिति में मौके पर भेजे जाने और हत्या करने का अवसर दिए जाने की संभावना से इनकार नहीं किया जा सकता है.

अतः मामले में उत्तर प्रदेश पुलिस द्वारा किसी भी स्थिति में निष्पक्ष जांच नहीं की जा सकती है और इस प्रकरण की वास्तविकता तथा इसके अन्दर की छिपी सच्चाईयों/षडयंत्र आदि को सामने लाने के लिए सीबीआई जाँच नितांत आवश्यक दिखता है .

अतः कृपया इस प्रकरण को न्यायहित में राज्य सरकार को Delhi Police Establishment Act 1946 की धारा 06 Consent of State Government to exercise of powers and jurisdiction में निहित प्रावधानों के अंतर्गत सीबीआई को संदर्भित किये जाने की कृपा करें. कृपया अवगत कराना है कि यदि सरकार मामले को सीबीआई को संदर्भित नहीं करती है तो अधिकार सेना इसे लेकर माननीय सुप्रीम कोर्ट जाएगी.

पत्र संख्या- Adhikar/25/2023
दिनांक- 16/04/2023

भवदीय,

(अमिताभ ठाकुर)
राष्ट्रीय अध्यक्ष,
अधिकार सेना
5/426, विराम खंड,
गोमतीनगर, लखनऊ
9415534526

प्रतिलिपि- मुख्य सचिव, एसीएस होम तथा डीजीपी, यूपी को कृपया आवश्यक कार्यवाही हेतु

In the Hon'ble Supreme Court of India, New Delhi

Letter Petition (PIL) No- of 2023
Amitabh Thakur Petitioner
Versus
State of Uttar Pradesh and others Respondents

AFFIDAVIT

I, Amitabh Thakur, aged about 55 years, s/o Sri T N Thakur, religion Hinduism, Education- B Tech, profession- ex IPS officer, r/o 5/426, Viram Khand, Gomti Nagar, Lucknow the deponent, do hereby solemnly affirm and state on oath as under-

1. That the deponent is petitioner in the above noted petition and as such he is fully conversant with the facts and circumstances of the case, deposed to hereunder.
2. That the contents of the paragraphs 1-3, 6-16, 18, 19, 24, 25 of the Writ petition are true to my personal knowledge, 4, 5, 17,

20-23 based on documents and records and believed to be true and NIL are based on legal advice.

3. That the Annexures No 1 to 2 are the true copy of the original.

Place Lucknow
Date- 17/04/2023

(Amitabh Thakur)
Deponent

Verification

I, the deponent above named, do hereby verify that the contents of paragraphs 1 to 3 above this Affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed. So, help me God

Signed and verified this the day of April 2023 at Lucknow

Deponent