

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL).No.

OF 2023

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DATE: 1 .09.2023
AMARAVATI

Counsel for the Petitioner

Ramesh Kandula

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MEMORANDUM OF WRIT PETITION
(SPECIAL ORIGINAL JURISDICTION)
(UNDER ART. 226 OF THE CONSTITUTION OF INDIA)

HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL). NO.

OF 2023

BETWEEN:

1. Vundavalli Aruna Kumar
Aged about 70 years Occ. Advocate
S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari - 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry

..... Petitioner

AND

1. The Union of India
Represented by its Secretary,
Ministry of Home Affairs
New Delhi - 110 001
2. The Central Bureau of Investigation
Rep by its Director, CGO Complex, Lodhi Road
New Delhi - 110 003
3. The Directorate of Enforcement,
Rep by its Director,
Pravarthan Bhavan, New Delhi - 110 011
4. The State of Andhra Pradesh.
Rep. by its Principal Secretary
Department of Home, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
5. The State of Andhara Pradesh,
Rep by its Director,
Crime Investigation Department,
Mangalagiri, Andhra Pradesh.
6. Ghanta Subba Rao, S/o Venkata Ramaiah,
Aged about 62 yrs, R/o Dhyanaahita High School Compound,
Shabad (V) & (M), Ranga Reddy Dist., Telangana State

7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years, R/o. Plot No. 108, Road No. 71, Behind Jubilee Hills School, Nava Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad, Telengana State
8. Nimmagadda Venkata Krishna Prasad, S/o Jagannadha Sharma, 64 years, Occ: Retd Employee, R/o. Flat No. 209/A, Road No-4, Phase - III, Prasanthi Hills, Saroornagar, Meerpet, Rangareddy District.
9. Design Tech Systems Pvt Ltd, 6, Commerce Centre, Rambaug Colony, Paud Road, Pune, Maharashtra, 411 038.
10. Skillar Enterprises India Pvt.Ltd (formerly known as PVSP IT Skills Projects Pvt.Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai (ACI).
11. Soumyadri Shekhar Bose @ Suman Bose, S/o Neeladri Sekhar Bose, R/o MA-2/2, 3B, Garden Estate, Gurgaon-102002. the then Managing Director, M/s SIEMENS Industry Software (India) Pvt.Ltd.
12. Pratap Kumar Kar, Chief Financial Officer, AP State Skill Development Corporation.
13. Vikas Vinayak Khanvelkar, s/o Vinayak, Age: 65 yrs, R/o "Kaivalya" 464, Mahatma Co-operating Housing Society, Kothrud, Pune, Managing Director of Design Tech Systems Limited, Pune.
14. Sanjay Daga, President of DesignTech Systems Limited, Pune.
15. Mukul Chandra Agarwal S/o Dinesh Chandra, Age 53 Years, Occ: Cadence Partner LLP, previous worked as COO, PVSP IT Skills Projects Pvt Ltd later Changed to M/s Skillar Enterprises Pvt. Ltd., Resident of Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Chief Operating Officer, Skillar Enterprises India Pvt. Ltd.
16. Saurabh Garg, Managing Director, Skillar Enterprises India Pvt. Ltd (formerly known as PVSP IT Skills Projects Pvt. Ltd.)
17. Hirji Kanji Patel, Managing Director, M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)
18. Shirish Chandrakant Shah S/o Chandrakant Bhogilal Shah, age 56 years, Business Stock Broking, resident of Flat No. 21, 4th Floor, Meghadoot Building, Netaji Shubhashchandra Road, Mumbai-400002, Maharastra State, Director of M/s Allied Computers International (Asia) Ltd., Mumbai (ACI), (Arrested on 14/12/2021 at Mumbai)
19. Directors of M/s Patrik Info Services Pvt.Ltd.
20. Directors of M/s IT Smith Solutions Pvt.Ltd.
21. Directors of M/s M/s. Inweb Services Pvt. Ltd.

22. Project Team Members associated with Mr.SoumyadriShekhar Bose @ Suman Bose's SIEMENS.
23. Directors of Knowledge Podium.
24. Directors of TalentEdge (Arrina Education Services Pvt. Ltd.)
25. Suresh Goyal, S/o S.R. Goyal, 60 yrs, Residing at P-80, 1st Floor, South Extension Part-II, Andrews Ganj, South Delhi, Occ: Chartered Accountant.
26. Manoj Kumar Jain, S/o Tulsi Ram, 58 yrs, Occ: Chartered Accountant, R/o C-34, South Extension, Part-II, New Delhi.
27. Yogesh Gupta, S/o Prem Babu Gupta (late), 49 yrs, Occ: Shares Trading Business, R/o H.No.1/9904, Street No.1, Near Babapur Road, Near Hanuman Mandir, West Gorak Park, Shahadra, Delhi
28. Sita Ram Arora, S/o Ram Kishan Arora, 51 yrs, No.10/355, First Floor, Sunder Vihar, Paschim Vihar, West Delhi, New Delhi-110087 (Expired on 26/04/2021)
29. Saurabh Gupta, S/o Satheesh Kumar Gupta, Age 37 yrs, r/o D9, Rajouri Garden, and Office situated at Z1A, Rajouri Garden, New Delhi-
30. Vipin Kumar Sharma, S/o Prem Chand Sharma, Age 40 years, Chartered Accountant, CA firm M/s Vipin Sharma & Associates, R/o. Flat No: 144, Tower - N, DLF Capital Greens, New Delhi
31. Sawan Kumar Tolaram Jajoo, S/o Tolaram Jajoo, 41 years, Occ: Shares Trading Business, R/o. Flat No.501, Salasar Gokul Co-operative Housing society, Salasar Brij Bhoomi, Opp. Maxus Mall, Bhayander West, Thane, near Mumbai, Maharashtra State
32. M/s. Allied Computers International (Asia) Ltd., Mumbai (ACI)
33. Smt. Neelam Sharma, W/o Vipin Kumar Sharma, Age 37 years, Director, M/s. Inweb Services Pvt., Ltd., R/o Flat No. N-144, DLF Capital City Greens, Moti Nagar, New Delhi.
34. M/s Bharatiya Global Infomedia Limited, New Delhi;
35. Rakesh Bhatia, Managing Director, M/s Bharatiya Global Infomedia Limited, New Delhi.
36. Ms. Shafali Agarwal, W/o Mukul Chandra Agarwal, Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Director of M/s ETA Greens, Knowledge Podium, SM Professional and Cadence Partners LLP.
37. M/s Cadence Partners Firm (Cadence Partners LLP company), Unit No.1, Ground Floor, Building No. 7, 619/4, Opposite Tivoli Garden, Chhattarpur New Delhi-110074; Represented by its Director and Authorized Signatory Mukul Chandra Agarwal (A.10)
38. M/s ETA Greens Buildtech Pvt. Ltd., 602, Naurang Bhawan,

- 21 K.G. Marg, New Delhi-110001, Represented by its Director Ms. Shafali Agarwal (A.31)
39. M/s Polaris Softech Pvt. Ltd., 602, Naurang Bhawan, 21, Kasturba Gandhi Marg, New Delhi-110001, Represented by its shareholder Mukul Chandra Agarwal (A.10)
40. Ganti Venkata Satya Bhaskar Prasad, S/o Seshagiri Rao, 49 yrs, APSSDC Project and other projects Team Head, M/s SISW, Gurgaon, R/o No.3361, Alok Vihar, F-3, Sector-50, Noida, Uttar Pradesh.
41. Aparna Upadhyayula IAS, former Deputy CEO of APSSDC, now Secretary Health Department, MD, NHM, Lucknow, Uttar Pradesh State, R/o H.No.3361, Alok Vihar, F-3, Sector-15, Noida, Uttar Pradesh.
42. Sri Nara Chandra Babu Naidu, S/o Nara Kharjura Naidu, Age:73 years, former Chief Minister of Andhra Pradesh, presently MLA, Kuppam Assembly Constituency, Chittoor District, R/o Undavalli, Tadepalli Mandal, Guntur District.
43. Sri Kinjarapu Atchannaidu, S/o late Dalinaidu, former Minister for Labour, Employment & Training, Factories, Youth & Sports, Skill Development and Entrepreneurship & Innovation Department. Presently MLA, Tekkali Assembly Constituency, Srikakulam Dist.
44. The A.P. State Skill Development Corporation, 3rd floor, Infosight building, Near Patharu Road Junction, Tadepalli, Guntur - 522 501

Respondents

The address for service on the above-named Petitioners is that of their counsel **Tagore Yadav Yaragorla (24645) Advocate**, Krushi Bhavan, Road No. 4, SR Colony, Gurunanaknagar, Vijayawada-520008

For the reasons stated in the accompanying affidavit, it is hereby prayed that this Hon'ble Court may be pleased to issue appropriate writ(s), direction(s) or order(s), more particularly in the nature of a writ of mandamus or such other writ, transferring the investigation in Cr. No. 29/2021 dt. 9.12.2021 registered on the file of the 5th respondent, to the 2nd respondent, in the interests of comprehensive and speedier conclusion of the investigation into

the subject matter, having regard to the complex facts involving multiple States, high profile of the accused, financial fraud disclosed in the case, and pass such other order or orders as are deemed fit and proper in the facts and circumstances of the case.

DATE: .09.2023
AMARAVATI

Counsel for the Petitioner

Ramesh Kandula

EAST GODAVARI : DISTRICT
HIGH COURT OF ANDHRA PRADESH AT
AMARAVATI

WP(PIL). NO. OF 2023

WRIT PETITION

Filed On: .09.2023

Filed By:
TAGORE YADAV YARAGORLA (24645)
ADVOCATES

COUNSELS FOR PETITIONER

- 8 -

HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL).NO. of 2023

LIST OF EVENTSAnnexure - I

S.No	Date	Description of the Events	Page Nos in Affidavit	Para No. in Affidavit
1	09.12.2021	Initially an FIR is registered in Cr No. 29/2021 dt. 09.12.2021 on the complaint of Sri K. Ajay Reddy, Chairman, AP State Skill Development Corporation against 26 accused, the 26th accused being the 31 st respondent herein. It is revealed in the public domain, that in due course of time the rest of the accused were joined as such in the crime, leading to the total accused being 38, being the respondent No. 43 in the present W.P.(PIL).		V(1)
2	09.12.2021	Pursuant to the incorporation of AP Skill Development Corporation, a training programme was conceived whereby and whereunder six skill clusters would be developed by the private agencies, being M/s. Siemens Industry software (India) Private Limited and M/s. Design Tech Systems Private Limited at an outlay of Rs.546 crores, per cluster, wherein siemens would provide a grant in aid of Rs.491 crores and the State contribution would be to the extent of Rs. 55 crores per cluster. The total cost of the project thus works out Rs.3281 crores, out of which the State contribution would be limited to 10% of the same inclusive of taxes, working out to around Rs. 371 crores.		V(1)
3	09.12.2021	A tax investigation conducted by ADG, GST Intelligence, Pune in respect of two entities, Design Tech Systems Private Limited and M/s. Skillar Enterprises India Private Limited unearthed a scam of running into crores of rupees. The details of the modus operandi are elaborated in the subject matter. The deeper investigation of ADG, GST Intelligence found that various Shell/Defunct Companies formed into a cartel, siphoning the public funds of crores of rupees whereupon a forensic		V(1)

		audit was got conducted into the said aspect.		
4	09.12.2021	A third party audit of the performance arising from the monies paid by the Government was got done which showed that many of the software items were missing. Further, as narrated in the GST report of Pune, most of the transactions shown to have occurred in pursuance of the instant contract, between Designtech and various other companies incorporated for the sham purpose of raising invoices, were shell companies and no services were either contracted or delivered.		V(1)
5	04.03.2023	On the basis of the above predicate offence, the Enforcement Directorate, having come to a conclusion that the crime proceeds have been subjected to money laundering, initiated proceedings under the Prevention of Money laundering Act, 2002 being ECIR No. ECIR/HYZO/03/2022. It is in the public domain that the 3 rd respondent Enforcement Directorate arrested a few of the accused therein and their investigation is also pending.		V(1)
6	10.09.2023	With the inclusion of the respondent No. 42 as A37, his arrest on 09.09.2023 and remand to judicial custody, by the orders dt. 10.9.2023 of the Special Court, the State is witnessing a volley of contentions and rival contentions regarding the merits of the investigation. The respondent No. 42 being the accused No. 37, and persons on his behalf, contend that the case is politically motivated while the State agencies rebut the same. Curiously, retired Honourable Judges of the State, senior civil servants have joined the fray of competitive posturing in the subject matter. The discourse has turned shrill and loud with each passing day. The primary objective of investigation being inquiry into corruption in public life, siphoning of public monies, money laundering is getting shrouded by such raucous public discourse on the subject matter.		2
8	18.09.2023	An investigation by the national agencies would insulate any such investigation from any attribution of apprehended motives and also considering the stature of such		7

	<p>investigation agency, the logical conclusion of the present investigation could be secured unhinged by the cacophony surrounding the case. An economic offence is a drain on the country and has ramifications affecting the lives and livelihood of crores of people. If indeed, public monies have been siphoned off to the pockets of private persons or public servants, such a course of public life would be detrimental to the progress of the newly formed State and the country at large. At the same time, such investigation by the premier agency would ensure that there are no loose ends to the investigation and the culprits are brought to book. Hence the present PIL.</p>	
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ANNEXURE-II

Under Article 226 of Constitution of India.

AMARAVATI
DATE: .09.2023

Counsel for Petitioner

Ramesh Kairdula

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**IN THE HIGH COURT OF STATE OF ANDHRA PRADESH
AT AMARAVATI**

(Rule 4(e) of the High Court of Judicature for the State of Andhra Pradesh
Public Interest Litigation Rules, 2015)

Writ Petition (PIL) No. of 2023

BETWEEN:

1. Vundavalli Aruna Kumar
Aged about 70 years Occ. Advocate
S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari – 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry
..... Petitioner

AND

1. The Union of India
Represented by its Secretary,
Ministry of Home Affairs
New Delhi – 110 001
 2. The Central Bureau of Investigation
Rep by its Director, CGO Complex, Lodhi Road
New Delhi – 110 003
 3. The Directorate of Enforcement,
Rep by its Director,
Pravarthan Bhavan, New Delhi – 110 011
 4. The State of Andhra Pradesh.
Rep. by its Principal Secretary
Department of Home, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
 5. The State of Andhara Pradesh,
Rep by its Director,
Crime Investigation Department,
Mangalagiri, Andhra Pradesh.
 6. Ghanta Subba Rao, S/o Venkata Ramaiah,
Cell: 9440179705 Ph: 0883-2449544
- T. SITA RAMANJANEYA MURTHY**
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Dt.

V. Anurag

12:

Aged about 62 yrs, R/o Dhyanahita High School Compound,
Shabad (V) & (M), Ranga Reddy Dist., Telangana State

7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years, R/o. Plot No.108, Road No.71, Behind Jubilee Hills School, Nava Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad, Telangana State
8. Nimmagadda Venkata Krishna Prasad, S/o Jagannadha Sharma, 64 years, Occ: Retd Employee, R/o. Flat No.209/A, Road No-4, Phase - III, Prasanthi Hills, Saroornagar, Meerpet, Rangareddy District.
9. Design Tech Systems Pvt Ltd, 6, Commerce Centre, Rambaug Colony, Paud Road, Pune, Maharashtra, 411 038.
10. Skillar Enterprises India Pvt.Ltd (formerly known as PVSP IT Skills Projects Pvt.Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai (ACI).
11. Soumyadri Shekhar Bose @ Suman Bose, S/o Neeladri Sekhar Bose, R/o MA-2/2, 3B, Garden Estate, Gurgaon-102002. the then Managing Director, M/s SIEMENS Industry Software (India) Pvt.Ltd.
12. Pratap Kumar Kar, Chief Financial Officer, AP State Skill Development Corporation.
13. Vikas Vinayak Khanvelkar, s/o Vinayak, Age: 65 yrs, R/o "Kaivalya" 464, Mahatma Co-operating Housing Society, Kothrud, Pune, Managing Director of Design Tech Systems Limited, Pune.
14. Sanjay Daga, President of DesignTech Systems Limited, Pune.
15. Mukul Chandra Agarwal S/o Dinesh Chandra, Age 53 Years, Occ: Cadence Partner LLP, previous worked as COO, PVSP IT Skills Projects Pvt Ltd later Changed to M/s Skillar Enterprises Pvt. Ltd., Resident of Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Chief Operating Officer, Skillar Enterprises India Pvt. Ltd.
16. Saurabh Garg, Managing Director, Skillar Enterprises India Pvt. Ltd (formerly known as PVSP IT Skills Projects Pvt. Ltd.)
17. Hirji Kanji Patel, Managing Director, M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)
18. Shirish Chandrakant Shah S/o Chandrakant Bhogilal Shah, age 56 years, Business Stock Broking, resident of Flat No. 21, 4th Floor, Meghadoot Building, Netaji Shubhashchandra Road, Mumbai-400002, Maharastra State, Director of M/s Allied Computers International (Asia) Ltd., Mumbai (ACI), (Arrested on 14/12/2021 at Mumbai)
19. Directors of M/s Patrik Info Services Pvt.Ltd.
20. Directors of M/s IT Smith Solutions Pvt.Ltd.

Call: 94401 79705 Ph: 0883-2449544
T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar
RAJAHMUNDRY., E.G.Dt.


V. Anurag

- 13
21. Directors of M/s M/s. Inweb Services Pvt. Ltd.
 22. Project Team Members associated with Mr.SoumyadriShekhar Bose @ Suman Bose's SIEMENS.
 23. Directors of Knowledge Podium.
 24. Directors of TalentEdge (Arrina Education Services Pvt. Ltd.)
 25. Suresh Goyal, S/o S.R. Goyal, 60 yrs, Residing at P-80, 1st Floor, South Extension Part-II, Andrews Ganj, South Delhi, Occ: Chartered Accountant.
 26. Manoj Kumar Jain, S/o Tulsi Ram, 58 yrs, Occ: Chartered Accountant, R/o C-34, South Extension, Part-II, New Delhi.
 27. Yogesh Gupta, S/o Prem Babu Gupta (late), 49 yrs, Occ: Shares Trading Business, R/o H.No.1/9904, Street No.1, Near Babapur Road, Near Hanuman Mandir, West Gorak Park, Shahadra, Delhi
 28. Sita Ram Arora, S/o Ram Kishan Arora, 51 yrs, No.10/355, First Floor, Sunder Vihar, Paschim Vihar, West Delhi, New Delhi-110087 (Expired on 26/04/2021)
 29. Saurabh Gupta, S/o Satheesh Kumar Gupta, Age 37 yrs, r/o D9, Rajouri Garden, and Office situated at Z1A, Rajouri Garden, New Delhi-
 30. Vipin Kumar Sharma, S/o Prem Chand Sharma, Age 40 years, Chartered Accountant, CA firm M/s Vipin Sharma & Associates, R/o. Flat No: 144, Tower - N, DLF Capital Greens, New Delhi
 31. Sawan Kumar Tolaram Jajoo, S/o Tolaram Jajoo, 41 years, Occ: Shares Trading Business, R/o. Flat No.501, Salasar Gokul Co-operative Housing society, Salasar Brij Bhoomi, Opp. Maxus Mall, Bhayander West, Thane, near Mumbai, Maharashtra State
 32. M/s. Allied Computers International (Asia) Ltd., Mumbai (ACI)
 33. Smt. Neelam Sharma, W/o Vipin Kumar Sharma, Age 37 years, Director, M/s. Inweb Services Pvt., Ltd., R/o Flat No. N-144, DLF Capital City Greens, Moti Nagar, New Delhi.
 34. M/s Bharatiya Global Infomedia Limited, New Delhi;
 35. Rakesh Bhatia, Managing Director, M/s Bharatiya Global Infomedia Limited, New Delhi.
 36. Ms. Shafali Agarwal, W/o Mukul Chandra Agarwal, Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Director of M/s ETA Greens, Knowledge Podium, SM Professional and Cadence Partners LLP.
 37. M/s Cadence Partners Firm (Cadence Partners LLP company), Unit No.1, Ground Floor, Building No. 7, 619/4, Opposite Tivoli Garden, Chhattarpur New Delhi-110074; Represented by its Director and Authorized Signatory Mukul Chandra

Cell: 98491 79705 Ph: 0883-2449333

T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)

ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
DAJALIMUNDRY F.G.Dt.



4
Agarwal (A.10)

38. M/s ETA Grccns Buildtch Pvt. Ltd., 602, Naurang Bhawan, 21 K.G. Marg, New Delhi-110001, Represented by its Director Ms. Shafali Agarwal (A.31)
39. M/s Polaris Softech Pvt. Ltd., 602, Naurang Bhawan, 21, Kasturba Gandhi Marg, New Delhi-110001, Represented by its shareholder Mukul Chandra Agarwal (A.10)
40. Ganti Venkata Satya Bhaskar Prasad, S/o Seshagiri Rao, 49 yrs, APSSDC Project and other projects Team Head, M/s SISW, Gurgaon, R/o No.3361, Alok Vihar, F-3, Sector-50, Noida, Uttar Pradesh.
41. Aparna Upadhyayula IAS, former Deputy CEO of APSSDC, now Secretary Health Department, MD, NHM, Lucknow, Uttar Pradesh State, R/o H.No.3361, Alok Vihar, F-3, Sector-15, Noida, Uttar Pradesh.
42. Sri Nara Chandra Babu Naidu, S/o Nara Kharjura Naidu, Age:73 years, former Chief Minister of Andhra Pradesh, presently MLA, Kuppam Assembly Constituency, Chittoor District, R/o Undavalli, Tadepalli Mandal, Guntur District.
43. Sri Kinjarapu Atchannaidu, S/o late Dalinaidu, former Minister for Labour, Employment & Training, Factories, Youth & Sports, Skill Development and Entrepreneurship & Innovation Department. Presently MLA, Tekkali Assembly Constituency, Srikakulam Dist.
44. The A.P. State Skill Development Corporation, 3rd floor, Infosight building, Near Patharu Road Junction, Tadepalli, Guntur - 522 501

Respondents

AFFIDAVIT

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: AdvocaR/o. 174-6-51, Sravanthi Buildings, Rajamundry, Andhra Pradesh - 533 101 do hereby solemnly state and affirm as follows:-

Call: 9440170705 or 9883-244544
S. SITA S. S. MURTHY (S.S. MURTHY)
ADVOCATE & NOTARY
D No. 74-B-10, Prakash Nagar
RAJAMUNDRY, E.G.D.

V. Arundhan

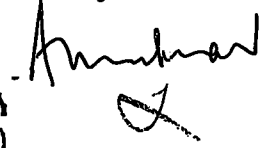
15-

I. PARTICULARS OF THE CAUSE/ORDER AGAINST WHICH THE PETITION IS BEING FILED:

1. I am the Petitioner No. 1 herein and as such I am well acquainted with the facts of the case.
2. It is respectfully submitted that I am filing the present Writ Petition as Public Interest Litigation invoking the jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India, seeking issuance of a writ, order, or direction in the nature of a writ of mandamus seeking the transfer of investigation concerning the Crime. No. 29/2021 dt. 9.12.2021 registered on the file of the CID Police Station, Mangalagiri to the respondents No. 2 and 3 or any other central agency in the interests of early, comprehensive and conclusive investigation in regard to the same and pass such other order(s) as this Hon'ble Court may deem fit and proper in the interest of justice.

II. PARTICULARS OF THE PETITIONERS:

1. It is most humbly submitted that I am the resident of Rajamundry I am a law abiding citizen. The present W.P. in public interest is filed to secure a comprehensive and conclusive investigation into Crime No. 29/2021 in the interests of the people of the State having regard to the multi-State dimensions of the said crime being investigated by the 4th respondent, the array of accused in such case and the aspects of money laundering connected to the said case, already in the seisin of the 3rd respondent.
2. I further submit that I am not involved in any civil or criminal litigation connected to the subject matter any capacity before any court of law.


 Cell: 9440179705 Ph: 08832449544
T. SITA RAMANJANEYA MURTHY
 (T.S.R. MURTHY)
 ADVOCATE & NOTARY
 D.No. 74-6-10, Prakash Nagar,
 RAJAHMUNDRY F.G.D.

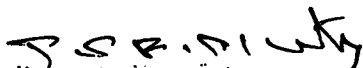
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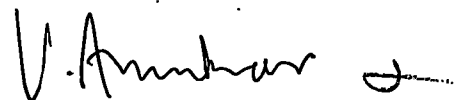
III. LOCUS-STANDI:

1. I humbly state, solemnly affirm and sincerely state on oath that I have no financial interest in the subject-matter of this Petition. I undertake to pay costs as directed by this Hon'ble Court in the event of a contrary finding or upon adjudication by this Hon'ble Court that the instant Petition is filed for extraneous/personal consideration or with an oblique motive.

2. I submit that I was elected as Member of Parliament on the ticket of Indian National Congress from Rajahmundry constituency in the year 2004 and 2009. I have been actively engaging in the public affairs of the State of A.P. and have participated in various debates and movements concerning the interests of the State of A.P. I filed a WP© No. 219 of 2014 in public interest in the Honourable Supreme Court of India challenging the provisions of the A.P. Reorganisation Act, 2014 and the said W.P. is pending. I intervened in a W.P. (PIL) No. 299/2017 filed in the erstwhile common High Court of A.P. concerning the conclusion of Polavaram Irrigation project and the said W.P. is pending. I also intervened in a case concerning the investigation in a criminal case registered in the State of Andhra Pradesh into vote for note scam seeking early conclusion of the said investigation.

3. I enrolled myself as an Advocate on the rolls of the A.P. State Bar council bearing No. AP/578/1986 dt. 04.07.1986 and have myself argued the Polavaram case in this Honourable Court and the Writ Petition challenging the State re-organisation Act, 2014 in Honourable Supreme Court.


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T. SITA RAMANJANEYA MURTHY
 (T.S.R. MURTHY)
 · ADVOCATE & NOTARY
 D.No. 74-6-10, Prakash Nagar,
 RAJAHMUNDRY., E.G.DI.



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IV. DECLARATION AND UNDERSTANDING OF THE PETITIONERS:

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101 do hereby solemnly state and affirm as follows:-

1. The present Writ Petition is being filed by way of Public Interest Litigation and I do not have any financial interest in the matter. This Writ Petition is being filed in the larger interest of the people of the State and in the interests of early, comprehensive and conclusive investigation of the subject investigation undertaken by the 4th respondent.
2. That the entire costs of litigation, including the advocates fee is borne by me. My Aadhaar No. is 2415 1767 2901. All the expenses for filing this Writ Petition and the advocates fee as borne by me.
3. All the relevant documents pertinent to the subject matter of the instant writ petition are downloaded from the internet and obtained from public sources and as available in public domain.
4. That I did not file any public interest litigation in any other Court with regard to the same subject matter of this Petition.

V. FACTS IN BRIEF:

1. It is respectfully submitted that the following details are discerned from the public domain, including from the documents filed in this Honourable Court and the Special Court for SPE & ACB Cases cum Additional Metropolitan Sessions Judge, Vijayawada. The documents relied upon by me are forming part of the series of petitions filed by persons

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V. Arun Kumar

amongst the respondents 6 to 43, being accused in Cr No. 29/2021 dt. 9.12.2021.

A) Initially an FIR is registered in Cr No. 29/2021 dt. 09.12.2021 on the complaint of Sri K. Ajay Reddy, Chairman, AP State Skill Development Corporation against 26 accused, the 26th accused being the 31st respondent herein. It is revealed in the public domain, that in due course of time the rest of the accused were joined as such in the crime, leading to the total accused being 38, being the respondent No. 43 in the present W.P.(PIL).

B) The gravamen of the complaint, as initially filed inter alia, was to the effect, as reflected in the FIR registered, was:

i) Pursuant to the incorporation of AP Skill Development Corporation, a training programme was conceived whereby and whereunder six skill clusters would be developed by the private agencies, being M/s. Siemens Industry software (India) Private Limited and M/s. Design Tech Systems Private Limited at an outlay of Rs.546 crores, per cluster, wherein siemens would provide a grant in aid of Rs.491 crores and the State contribution would be to the extent of Rs. 55 crores per cluster. The total cost of the project thus works out Rs.3281 crores, out of which the State contribution would be limited to 10% of the same inclusive of taxes, working out to around Rs. 371 crores.

ii. A tax investigation conducted by ADG, GST Intelligence, Pune in respect of two entities, Design Tech Systems Private Limited and M/s. Skillar Enterprises India Private Limited unearthed a scam of running into crores of rupees. The details of the modus operandi are elaborated in the subject matter. The deeper investigation of ADG, GST Intelligence found that various Shell/Defunct Companies formed into a cartel,

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[Handwritten Signature]

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siphoning the public funds of crores of rupees whereupon a forensic audit was got conducted into the said aspect.

iii. The forensic audit report unearthed a series of acts of commission and omission on the part of the accused in the crime. The primary case is that contrary to the Government Policy and Orders, a tripartite agreement was entered into between the Government agencies and the private parties, whereby, even before the private parties contributed any money towards the project, the Government released its share of 10% of the project cost, being Rs. 371 crores. It is revealed by the investigating agency that the said reversal of sequence of contributions, the release of public money of Rs. 371 crores, even before the contribution by Siemens Pune and Designtech, is undertaken at the persistent instructions of the former Chief Minister of the State, Sri N. Chandrababu Naidu, now added as accused No. 37, (Respondent No. 42) and his ministerial colleague, Sri AtchanNaidu, being accused No. 38 (Respondent No. 43) in the above said crime. It is also disclosed that the objections of senior bureaucrats were ignored/over ruled before releasing the so called 10% State's contribution into the project. The parent company Siemens AG being at Germany disowned any privity with the subject matter. Thus, the entire transaction was at the instance of Siemens Pune and Design Tech and the officials and the public servants of the State of A.P.

iv. A third party audit of the performance arising from the monies paid by the Government was got done which showed that many of the software items were missing. Further, as narrated in the GST report of Pune, most of the transactions shown to have occurred in pursuance of the instant contract, between Designtech and various other companies

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incorporated for the sham purpose of raising invoices, were shell companies and no services were either contracted or delivered.

v. On the basis of the above predicate offence, the Enforcement Directorate, having come to a conclusion that the crime proceeds have been subjected to money laundering, initiated proceedings under the Prevention of Money laundering Act, 2002 being ECIR No. ECIR/HYZO/03/2022. It is in the public domain that the 3rd respondent Enforcement Directorate arrested a few of the accused therein and their investigation is also pending.

2. It is respectfully submitted that with the inclusion of the respondent No. 42 as A37, his arrest on 09.09.2023 and remand to judicial custody, by the orders dt. 10.9.2023 of the Special Court, the State is witnessing a volley of contentions and rival contentions regarding the merits of the investigation. The respondent No. 42 being the accused No. 37, and persons on his behalf, contend that the case is politically motivated while the State agencies rebut the same. Curiously, retired Honourable Judges of the State, senior civil servants have joined the fray of competitive posturing in the subject matter. The discourse has turned shrill and loud with each passing day. The primary objective of investigation being inquiry into corruption in public life, siphoning of public monies, money laundering is getting shrouded by such raucous public discourse on the subject matter.

3. I have been vocal in my views on probity in public life, more so by people in power. I have no political affiliation presently, and have been critical of policies of Governments of the day, on the touchstone of public interest and peoples good.

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4. It is undeniable that the investigation is required to be thorough, impartial and objective to unearth the deep complex and complicated web of shell companies, sham transactions of money laundering. A case of such magnitude, with allegations of deep prior conspiracy amongst the top echelons of political and executive power, at the level of the former Chief Minister and his cabinet colleagues deserves an investigation, insulated from the political debate surrounding such matter of high public interest. Undeniably, the case involves, multiple States - Maharashtra, Delhi, financial transactions, complex web of financial fraud, corruption in high offices preceded by alleged deep rooted criminal conspiracy.

5. The 2nd respondent is a premier national agency with expertise in unravelling such crimes with a country-level presence. The 3rd respondent is already investigating into the dimensions of money laundering arising from the predicate offence presently being investigated into by the 5th respondent.

6. In matters involving high political offices and political functionaries, in a financial fraud, such as the present ones, which has clear vignettes of an economic case, The Honourable Supreme Court exercised its powers to transfer the said investigation to the 2nd and 3rd respondents. Having regard to the national ramifications of the crime, due to monies having trailed to different operatives in different States, the clear and visible complexity of the case, the associated political clamour in the instant case here in the State of A.P., it is just and necessary to ensure that the investigation is not derailed by the current political exchanges in this regard. I seek to rely on the judgement of the Honourable Supreme Court

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 RAJAHMUNDRY., E.G.Dt.

V. Anurag

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in the case of *Subrata Chatteraj v. Union of India* reported in **2014 (8) SCC 768**.

7. I respectfully submit that such an investigation by the national agencies would insulate any such investigation from any attribution of apprehended motives and also considering the stature of such investigation agency, the logical conclusion of the present investigation could be secured unhinged by the cacophony surrounding the case. An economic offence is a drain on the country and has ramifications affecting the lives and livelihood of crores of people. If indeed, public monies have been siphoned off to the pockets of private persons or public servants, such a course of public life would be detrimental to the progress of the newly formed State and the country at large. At the same time, such investigation by the premier agency would ensure that there are no loose ends to the investigation and the culprits are brought to book. Hence the present PIL.

III. SOURCE OF INFORMATION:

I submit that I have collected the information and documents relied upon in the instant Writ Petition through research and the state and social websites, news-papers and electronic media. The petitioner seeks to rely on the following documents as available in public domain:

- a) FIR in Crime No. 29/2021 along with enclosures.
- b) Remand report concerning Accused No. 37 (Respondent No. 42) filed before the Special Court dt. 10.09.2023.
- c) Order dt. 10.09.2023 passed by the Special Court.
- d) Orders passed by this Honourable Court in:


i. Order dt. 20.12.2021 in CRLP 7263 of 2021,

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T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)

ADVOCATE & NOTARY

D.No. 74-6-10, Prakash Nagar,



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- ii. Order dt. 17.01.2022 in CRLP 7339 of 2021,
 - iii. Order dt. 17.01.2022 in CRLP 31 of 2022,
 - iv. Order dt. 17.01.2022 in CRLP 7265 of 2021,
 - v. Order dt. 19.01.2022 in CRLP 151 of 2022,
 - vi. Order dt. 09.11.2022 in CRLP 8558 of 2022,
 - vii. Order dt. 09.11.2022 in CRLP 8555 of 2022,
 - viii. Order dt. 31.07.2023 in CRLP 3013 of 2023.

IV. NATURE OF EXTENT OF INJURY CAUSES/APPREHENDED:

It is submitted that the transfer of investigation to the 2nd respondent is necessary in public interest for comprehensive and speedier conclusion of investigation.

V. ANY REPRESENTATION MADE:

Having regard to the relief sought in the W.P., and the provisions of Delhi Special Police Establishment Act, 1946 and the judgements of the Courts, whereby entrustment of investigation to the 2nd respondent could occur only when so handed over by the State concerned or as directed by the Honourable Courts, no representation was made in this regard.

VI. DELAY IF ANY:

It is further submitted that there is no delay in approaching this Hon'ble Court

VII. DOCUMENTS RELIED UPON:

The relevant documents are filed as material papers in the Public Interest Litigation case, which were obtained from public sources and listed herewith.

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 D.No. 74-6-10, Prakash Nagar,
 RAJAHMUNDRY., E.G.Dt.

V. Anurag
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VIII. ALTERNATIVE REMEDY:

Under these circumstances, the Petitioner submits that he has no other efficacious alternative remedy except to approach this Hon'ble Court under Article 226 of the Constitution of India. Hence the Writ Petition.

IX. MATTERS NOT PREVIOUSLY FILED OR PENDING IN ANY COURT:

It is submitted that, I have not filed any writ, suit or other proceedings in respect of relief claimed in this writ petition, and no such writ, suit and other proceeding is pending in any court of law.

X. CAVEAT:

- A. I submit that I have not faced Contempt of Court proceedings under the Contempt of Courts Act, 1971.
- B. I further submit that I have not been ordered by the Hon'ble High Court or any other Court not to file Public Interest Litigation cases.
- C. I submit that, I am not involved in Civil, Criminal and Revenue cases which have any nexus with present Public Interest Litigation.
- D. I hereby solemnly state under oath, affirm and declare that the Writ Petition is being instituted purely in public interest and not at the instance of any other person or organization.
- E. I hereby solemnly state on oath and affirm and declare that the question raised in the present Writ Petition has not been raised or agitated earlier and that there are no other case(s) or Petition(s),

XI. MAIN RELIEF:

It is therefore prayed that this Hon'ble Court may be pleased to issue a writ, order, or direction in the nature of a writ of mandamus or such other writ, transferring the investigation in Cr. No. 29/2021 dt. 9.12.2021

registered on 01.12.2021 dt. 01.12.2021 of the 1st respondent, in the

T. SITA RAMANJANEYA MURTHY vs. the 2nd respondent, in the

(T.S.R. MURTHY)
 ADVOCATE & NOTARY
 D.No. 74-6-10, Prakash Nagar,
 BALAHMIINDRY.. E.G.Dt.

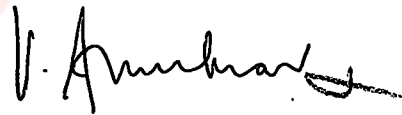
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 interests of comprehensive and speedier conclusion of the investigation into the subject matter, having regard to the complex facts involving multiple States, high profile of the accused, financial fraud disclosed in the case, and pass such other order or orders as are deemed fit and proper in the facts and circumstances of the case.

XII. INTERIM RELIEF:

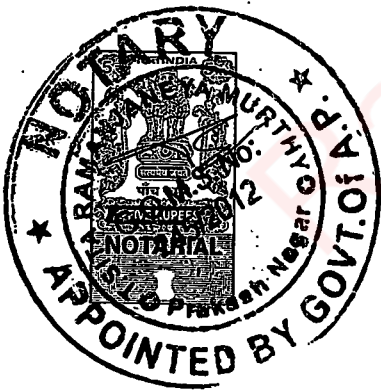
In light of the foregoing, it is therefore prayed that this Hon'ble Court may be pleased to direct the 2nd respondent to take over the investigation of the subject matter in Cr. No. 29/2021, dt. 29.12.2021 on the file of the respondent No. 5 pending disposal of the instant writ petition and pass such other order(s) as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

Solemnly and sincerely affirm this
 the 19 day of September, 2023



DEPONENT

ADVOCATE: AMARAVATI
 Cell: 94401 79705 Ph: 0883-2448000
 T. SITA RAMANJANEYA MURTHY 19/9/23
 (T.S.R. MURTHY)
 ADVOCATE & NOTARY
 D.No. 74-6-10, Prakash Nagar,
 RAJAHMUNDRY., E.G.DC.



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VERIFICATION

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh – 533 101, Mobile No: +91 9492176747, Aadhar No: 2415 1767 2901, Bank Account No. 10912807403, PAN Number: ADUPV 5773A, being the petitioner/ person acquainted with the facts do hereby verify and state that the contents of the above paras of the Affidavit are true and correct to the best of my knowledge.

Hence verified at AMARAVATI on this the day of ____ .09.2023.

V. Arunchari

COUNSEL FOR THE PETITIONERS

DEPONENT

Ramesh Kamboj

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HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL).NO.

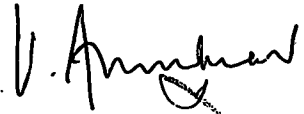
OF 2023

BETWEEN:

1. Vundavalli Aruna Kumar
Aged about 70 years Occ. Advocate
S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari - 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry
..... Petitioner

AND

1. The Union of India
Represented by its Secretary,
Ministry of Home Affairs
New Delhi - 110 001
2. The Central Bureau of Investigation rep
By its Director, CGO Complex, Lodhi Road
New Delhi - 110 003
3. The Directorate of Enforcement rep by its
Director, Pravarthan Bhavan, New Delhi - 110 011
4. The State of A.P. rep. by its Principal Secretary
Home Department, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
5. The State of A.P. rep by its Director,
Crime Investigation Department, Mangalagiri
A.P.
6. Ghanta Subba Rao, S/o Venkata Ramaiah, 62 yrs., R/o Dhyanaahita
High School Compound, Shabad (V) & (M), Ranga Reddy Dist.,
Telangana State
7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years,
r/o Plot No.108, Road No.71, Behind Jubilee Hills School, Nava
Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad


 RAJAHMUNDRY, E.G.D.

8. Nimmagadda Venkata Krishna Prasad, S/o Jagannadha Sharma, 64 years, Occ: Retd Employee, R/o. Flat No.209/A, Road No-4, Phase – III, Prasanthi Hills; Saroornagar, Meerpet, Rangareddy District.
9. Design Tech Systems Pvt Ltd, 6, Commerce Centre, Rambaug Colony, Paud Road, Pune, Maharashtra, 411 038.
10. Skillar Enterprises India Pvt.Ltd (formerly known as PVSP IT Skills Projects Pvt.Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai (ACI).
11. Soumyadri Shekhar Bose @ Suman Bose, S/o Neeladri Sekhar Bose, R/o MA-2/2, 3B, Garden Estate, Gurgaon-102002. the then Managing Director, M/s SIEMENS Industry Software (India) Pvt.Ltd.
12. Pratap Kumar Kar, Chief Financial Officer, AP State Skill Development Corporation.
13. Vikas Vinayak Khanvelkar, s/o Vinayak, Age: 65 yrs, R/o "Kaivalya" 464, Mahatma Co-operating Housing Society, Kothrud, Pune, Managing Director of Design Tech Systems Limited, Pune.
14. Sanjay Daga, President of DesignTech Systems Limited, Pune.
15. Mukul Chandra Agarwal S/o Dinesh Chandra, Age 53 Years, Occ: Cadence Partner LLP, previous worked as COO, PVSP IT Skills Projects Pvt Ltd later Changed to M/s Skillar Enterprises Pvt. Ltd., Resident of Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Chief Operating Officer, Skillar Enterprises India Pvt. Ltd.
16. Saurabh Garg, Managing Director, Skillar Enterprises India Pvt. Ltd (formerly known as PVSP IT Skills Projects Pvt. Ltd.)
17. Hirji Kanji Patel, Managing Director, M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)
18. Shirish Chandrakant Shah S/o Chandrakant Bhogilal Shah, age 56 years, Business Stock Broking, resident of Flat No. 21, 4th Floor, Meghadoot Building, Netaji Shubhashchandra Road, Mumbai-400002, Maharastra State, Director of M/s Allied Computers International (Asia) Ltd., Mumbai (ACI), (Arrested on 14/12/2021 at Mumbai)
19. Directors of M/s Patrik Info Services Pvt.Ltd.
20. Directors of M/s IT Smith Solutions Pvt.Ltd.
21. Directors of M/s M/s. Inweb Services Pvt. Ltd.
22. Project Team Members associated with Mr.SoumyadriShekhar Bose @ Suman Bose's SIEMENS.
23. Directors of Knowledge Podium.
24. Directors of TalentEdge (Arrina Education Services Pvt. Ltd.,)
25. Suresh Goyal, S/o S.R. Goyal, Residing at P-80, 1st

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- Floor, South Extension Part-II, Andrews Ganj, South Delhi,
Occ: Chartered Accountant.
26. Manoj Kumar Jain, S/o Tulsi Ram, 58 yrs, Occ: Chartered Accountant, R/o C-34, South Extension, Part-II, New Delhi.
 27. Yogesh Gupta, S/o Prem Babu Gupta (late), 49 yrs, Occ: Shares Trading Business, R/o H.No.1/9904, Street No.1, Near Babapur Road, Near Hanuman Mandir, West Gorak Park, Shahadra, Delhi
 28. Sita Ram Arora, S/o Ram Kishan Arora, 51 yrs, No.10/355, First Floor, Sunder Vihar, Paschim Vihar, West Delhi, New Delhi-110087 (Expired on 26/04/2021)
 29. Saurabh Gupta, S/o Satheesh Kumar Gupta, Age 37 yrs, r/o D9, Rajouri Garden, and Office situated at Z1A, Rajouri Garden, New Delhi-
 30. Vipin Kumar Sharma, S/o Prem Chand Sharma, Age 40 years, Chartered Accountant, CA firm M/s Vipin Sharma & Associates, R/o. Flat No: 144, Tower - N, DLF Capital Greens, New Delhi
 31. Sawan Kumar Tolaram Jajoo, S/o Tolaram Jajoo, 41 years, Occ: Shares Trading Business, R/o. Flat No.501, Salasar Gokul Co-operative Housing society, Salasar Brij Bhoomi, Opp. Maxus Mall, Bhayander West, Thane, near Mumbai, Maharashtra State
 32. M/s. Allied Computers International (Asia) Ltd., Mumbai (ACI)
 33. Smt. Neelam Sharma, W/o Vipin Kumar Sharma, Age 37 years, Director, M/s. Inweb Services Pvt., Ltd., R/o Flat No. N-144, DLF Capital City Greens, Moti Nagar, New Delhi.
 34. M/s Bharatiya Global Infomedia Limited, New Delhi;
 35. Rakesh Bhatia, Managing Director, M/s Bharatiya Global Infomedia Limited, New Delhi.
 36. Ms. Shafali Agarwal, W/o Mukul Chandra Agarwal, Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Director of M/s ETA Greens, Knowledge Podium, SM Professional and Cadence Partners LLP.
 37. M/s Cadence Partners Firm (Cadence Partners LLP company), Unit No.1, Ground Floor, Building No. 7, 619/4, Opposite Tivoli Garden, Chhattarpur New Delhi-110074; Represented by its Director and Authorized Signatory Mukul Chandra Agarwal (A.10)
 38. M/s ETA Greens Buildtech Pvt. Ltd., 602, Naurang Bhawan, 21 K.G. Marg, New Delhi-110001, Represented by its Director Ms. Shafali Agarwal (A.31)
 39. M/s Polaris Softech Pvt. Ltd., 602, Naurang Bhawan, 21, Kasturba Gandhi Marg, New Delhi-110001, Represented by its shareholder Mukul Chandra Agarwal (A.10)
 40. Ganti Venkata Satya Bhaskar Prasad, S/o Seshagiri Rao, 49

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 (T.S.R. MURTHY)
 . ADVOCATE & NOTARY
 D.No. 74-6-10, Prakash Nagar,
 D. RAJAMINDRY.. E.G.Dt.

V. Anil Kumar

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yrs, APSSDC Project and other projects Team Head, M/s SISW, Gurgaon, R/o No.3361, Alok Vihar, F-3, Sector-50, Noida, Uttar Pradesh.

41. Aparna Upadhyayula IAS, former Deputy CEO of APSSDC, now Secretary Health Department, MD, NHM, Lucknow, Uttar Pradesh State, R/o H.No.3361, Alok Vihar, F-3, Sector-15, Noida, Uttar Pradesh.
42. Sri Nara Chandra Babu Naidu, S/o Nara Kharjura Naidu, Age:73 years, former Chief Minister of Andhra Pradesh, presently MLA, Kuppam Assembly Constituency, Chittoor District, R/o Undavalli, Tadepalli Mandal, Guntur District.
43. Sri Kinjarapu Atchannaidu, S/o late Dalinaidu, former Minister for Labour, Employment & Training, Factories, Youth & Sports, Skill Development and Entrepreneurship & Innovation Department. Presently MLA, Tekkali Assembly Constituency, Srikakulam Dist.
44. The A.P. State Skill Development Corporation, 3rd floor, Infosight building, Near Patharu Road Junction, Tadepalli, Guntur - 522 501

Respondents

AFFIDAVIT
IN COMPLIANCE WITH RULE 5
OF THE PUBLIC INTEREST LITIGATION RULES, 2015

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajamundry, Andhra Pradesh - 533 101 do hereby solemnly state and affirm as follows:-:

1. I am the Petitioner herein and as such I am well acquainted with the facts of the case.
2. I state that my mobile number +91 9492176747, Aadhar number 2415 1767 2901, Bank Account No. 10912807403, PAN Number: ADUPV 5773A and my address and all particulars furnished in the above cause title are true and correct.
3. I am herewith annexing copies of Aadhar Card, Bank Account, PAN Card towards my identity and address proof as required under Rule-5(b) of the PIL Rules, 2105.
4. I submit that I did not face any court proceedings under the Contempt of Court Act, 1951.

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S. RAMANJANEYA MURTHY
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RAJAHMUNDRY., E.G.Di.

V. Arun Kumar

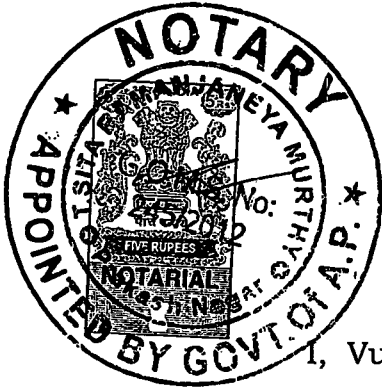
5. I have not been ordered by this Hon'ble Court or any other court not to file Public Interest Litigation Cases.
6. I submit that I have not involved in a civil, criminal and revenue cases.
7. I am not a party in pending civil or criminal cases that has a nexus with the subject matter of the above public interest litigation case.

Solemnly and sincerely affirm this
the day of 29 day of September, 2023
and signed his name in my presence. *[Signature]*

[Signature]

Deponent

BEFORE ME



[Signature]
Cen: 9440179705 Ph: 0883-2443744
ADVOCATE & NOTARY
T. SITA RAMANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Dt.

VERIFICATION STATEMENT

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101, Mobile No: +91 9492176747, Aadhar No: 2415 1767 2901, Bank Account No. 10912807403, PAN Number: ADUPV 5773A, being the petitioner/ person acquainted with the facts do hereby verify and state that the contents of the above paras of the Affidavit are true and correct to the best of my knowledge.

Hence verified at AMARAVATI on this the day of 29.09.2023.

[Signature]
Deponent

-32-

HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL). NO.

OF 2023

BETWEEN:

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Aged about 70 years Occ. Advocate
S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari - 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry
..... Petitioner

AND

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Represented by its Secretary,
Ministry of Home Affairs
New Delhi - 110 001
2. The Central Bureau of Investigation rep
By its Director, CGO Complex, Lodhi Road
New Delhi - 110 003
3. The Directorate of Enforcement rep by its
Director, Pravarthan Bhavan, New Delhi - 110 011
4. The State of A.P. rep. by its Principal Secretary
Home Department, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
5. The State of A.P. rep by its Director,
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6. Ghanta Subba Rao, S/o Venkata Ramaiah, 62 yrs., R/o Dhyanahita
High School Compound, Shabad (V) & (M), Ranga Reddy Dist.,
Telangana State
7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years,
r/o Plot No.108, Road No.71, Behind Jubilee Hills School, Nava
Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad

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9. Design Tech Systems Pvt Ltd, 6, Commerce Centre, Rambaug Colony, Paud Road, Pune, Maharashtra, 411 038.
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V. Ambarthi

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yrs, APSSDC Project and other projects Team Head, M/s SISW, Gurgaon, R/o No.3361, Alok Vihar, F-3, Sector-50, Noida, Uttar Pradesh.

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**DECLARATION FILED UNDER RULE 6
OF THE PUBLIC INTEREST LITIGATION RULES, 2015**

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101 do hereby solemnly and sincerely affirm and state on oath and declare that the writ petition (PIL) is being instituted purely in Public Interest and not at the instance of any other persons or organization other than the petitioner.

Verified at AMARAVATI on this day ___ day of September, 2023

Advocate

V. Amrutha
Deponent

T.S.R. Murthy
Cell: 94401-79705 Ph: 0883-2449544
T. SITA RAMANJANEYA MURTHY
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25. Suresh Goyal, S/o S.R. Govil, 56 yrs. Residing at P-80, 1st Cell-940749705 Ph: 0885244

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3-8-2021
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BALAJI HILL INDRY, E.G.D.I.

V. Anurag

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AFFIDAVIT
IN COMPLIANCE WITH RULE 7A
OF THE PUBLIC INTEREST LITIGATION RULES, 2015

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101, do hereby solemnly and sincerely affirm and state as follows:

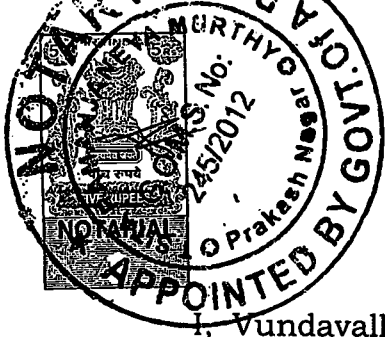
1. I am the Petitioner herein and as such I am well acquainted with the facts of the case.
2. I hereby affirm and state on oath that I have no personal interest in the above subject matter of this petition. I hereby undertake to pay exemplary costs and or compensatory damages as directed by the court that the writ petition (PIL) is filed for extraneous / personal considerations or for any other motive.

Cell: 9440179705 Pin: 533001
T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Dt.

(Handwritten Signature)

Solemnly and sincerely affirm this
the day of 29 day of September, 2023
and signed his name in my presence.

Deponent



BEFORE ME

Cell: 94401 79705 Ph: 0883-2449544

T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)

ADVOCATE :: AMARAVATI

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Hence verified at AMARAVATI on this the ____ day of September, 2023

V. Arun Kumar

Deponent

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/Cell: 944

T. SITA

A.P.

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RAJAMUNDRY

h: 9983-2449544

ANEYA MURTHY

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26. Manoj Kumar Jain, S/o Tulsi Ram, 58 yrs, Occ: Chartered Accountant, R/o C-34, South Extension, Part-II, New Delhi.
 27. Yogesh Gupta, S/o Prem Babu Gupta (late), 49 yrs, Occ: Shares Trading Business, R/o H.No.1/9904, Street No.1, Near Babapur Road, Near Hanuman Mandir, West Gorak Park, Shahadra, Delhi
 28. Sita Ram Arora, S/o Ram Kishan Arora, 51 yrs, No.10/355, First Floor, Sunder Vihar, Paschim Vihar, West Delhi, New Delhi-110087 (Expired on 26/04/2021)
 29. Saurabh Gupta, S/o Satheesh Kumar Gupta, Age 37 yrs, r/o D9, Rajouri Garden, and Office situated at Z1A, Rajouri Garden, New Delhi-
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 34. M/s Bharatiya Global Infomedia Limited, New Delhi;
 35. Rakesh Bhatia, Managing Director, M/s Bharatiya Global Infomedia Limited, New Delhi.
 36. Ms. Shafali Agarwal, W/o Mukul Chandra Agarwal, Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Director of M/s ETA Greens, Knowledge Podium, SM Professional and Cadence Partners LLP.
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 39. M/s Polaris Softech Pvt. Ltd., 602, Naurang Bhawan, 21, Kasturba Gandhi Marg, New Delhi-110001, Represented by its shareholder Mukul Chandra Agarwal (A.10)
 40. Ganti Venkata Satya Bhaskar Prasad, S/o Seshagiri Rao, 49

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SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)

ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY.. E.G.D.

yrs, APSSDC Project and other projects Team Head, M/s SISW, Gurgaon, R/o No.3361, Alok Vihar, F-3, Sector-50, Noida, Uttar Pradesh.


41. Aparna Upadhyayula IAS, former Deputy CEO of APSSDC, now Secretary Health Department, MD, NHM, Lucknow, Uttar Pradesh State, R/o H.No.3361, Alok Vihar, F-3, Sector-15, Noida, Uttar Pradesh.
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44. The A.P. State Skill Development Corporation, 3rd floor, Infosight building, Near Patharu Road Junction, Tadepalli, Guntur - 522 501


**DECLARATION FILED UNDER RULE 8
OF THE PUBLIC INTEREST LITIGATION RULES, 2015**

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101, do hereby solemnly and sincerely affirm and declare that the questions made in the writ petition (PIL) has not been raised are agitated earlier and there are no other case/s or petition/s filed or that are pending before this Hon'ble Court or any other forum or court to the best of my knowledge, and belief.

Verified at AMARAVATI on this ____ day of September, 2023.

Advocate


Deponent


Cell: 94401 79705 Ph: 0883-24495...
T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Di.

HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL).NO.

OF 2023

BETWEEN:

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S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari - 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry
..... Petitioner

AND

1. The Union of India
Represented by its Secretary,
Ministry of Home Affairs
New Delhi - 110 001
2. The Central Bureau of Investigation rep
By its Director, CGO Complex, Lodhi Road
New Delhi - 110 003
3. The Directorate of Enforcement rep by its
Director, Pravarthan Bhavan, New Delhi - 110 011
4. The State of A.P. rep. by its Principal Secretary
Home Department, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
5. The State of A.P. rep by its Director,
Crime Investigation Department, Mangalagiri
A.P.
6. Ghanta Subba Rao, S/o Venkata Ramaiah, 62 yrs., R/o Dhyana hita
High School Compound, Shabad (V) & (M), Ranga Reddy Dist.,
Telangana State
7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years,
r/o Plot No.108, Road No.71, Behind Jubilee Hills School, Nava
Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad

T. S. R. MURTHY
Cell No. 9492176747
T. S. R. RAMANJANEYA MURTHY
T. S. R. MURTHY
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D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY, E.G.D.

V. Anuradha

- 46
8. Nimmagadda Venkata Krishna Prasad, S/o Jagannadha Sharma, 64 years, Occ: Retd Employee, R/o. Flat No.209/A, Road No-4, Phase - III, Prasanthi Hills, Saroornagar, Meerpet, Rangareddy District.
 9. Design Tech Systems Pvt Ltd, 6, Commerce Centre, Rambaug Colony, Paud Road, Pune, Maharashtra, 411 038.
 10. Skillar Enterprises India Pvt.Ltd (formerly known as PVSP IT Skills Projects Pvt.Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai (ACI).
 11. Soumyadri Shekhar Bose @ Suman Bose, S/o Neeladri Sekhar Bose, R/o MA-2/2, 3B, Garden Estate, Gurgaon-102002. the then Managing Director, M/s SIEMENS Industry Software (India) Pvt.Ltd.
 12. Pratap Kumar Kar, Chief Financial Officer, AP State Skill Development Corporation.
 13. Vikas Vinayak Khanvelkar, s/o Vinayak, Age: 65 yrs, R/o "Kaivalya" 464, Mahatma Co-operating Housing Society, Kothrud, Pune, Managing Director of Design Tech Systems Limited, Pune.
 14. Sanjay Daga, President of DesignTech Systems Limited, Pune.
 15. Mukul Chandra Agarwal S/o Dinesh Chandra, Age 53 Years, Occ: Cadence Partner LLP, previous worked as COO, PVSP IT Skills Projects Pvt Ltd later Changed to M/s Skillar Enterprises Pvt. Ltd., Resident of Minifarm-10, Chattarpur Mandir Road, Chattarpur, New Delhi. Chief Operating Officer, Skillar Enterprises India Pvt. Ltd.
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 17. Hirji Kanji Patel, Managing Director, M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)
 18. Shirish Chandrakant Shah S/o Chandrakant Bhogilal Shah, age 56 years, Business Stock Broking, resident of Flat No. 21, 4th Floor, Meghadoot Building, Netaji Shubhashchandra Road, Mumbai-400002, Maharashtra State, Director of M/s Allied Computers International (Asia) Ltd., Mumbai (ACI), (Arrested on 14/12/2021 at Mumbai)
 19. Directors of M/s Patrik Info Services Pvt.Ltd.
 20. Directors of M/s IT Smith Solutions Pvt.Ltd.
 21. Directors of M/s M/s. Inweb Services Pvt. Ltd.
 22. Project Team Members associated with Mr.SoumyadriShekhar Bose @ Suman Bose's SIEMENS.
 23. Directors of Knowledge Podium.
 24. Directors of TalentEdge (Arrina Education Services Pvt. Ltd.,)
 25. Suresh Goyal, S/o S. R. Goyal, 50 yrs, Residing at P-80, 1st

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 T. SITA RAMANJANEYA MURTHY
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T. SITA RAMANJANEYA MURTHY

(T.S.R. MURTHY)

ADVOCATE & NOTARY

D.No. 74-S-10, Prakash Nagar,

RAJAHMENDRY F.C.D.

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44. The A.P. State Skill Development Corporation, 3rd floor, Infosight building, Near Patharu Road Junction, Tadepalli, Guntur - 522 501

AFFIDAVIT
IN COMPLIANCE WITH RULE 10(a),(b),(c)&(e) OF
THE PUBLIC INTEREST LITIGATION RULES, 2015

I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101, do hereby solemnly and sincerely affirm and state as follows:

1. I am the Petitioner herein and as such I am well acquainted with the facts of the case.
2. I respectfully state that I have no personal gain, private motive or oblique reason in filing the present public Interest Litigation.
3. I hereby undertake to pay costs as ordered by the court, if it is ultimately held that the petition is frivolous or has been filed for extraneous consideration or that it lack bona fides.

Cell: 9440179705 Ph: 0883-2449544
T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Di.

S.R. Murthy
V. Arun Kumar

49

4. I hereby undertake that I will disclose the source of my information, leading to the filing of the Public Interest Litigation, if and when called upon by the court, to do so.

5. I hereby undertake that I will disclose the source of my information, leading to the filing of the Public Interest Litigation, if and when called upon by the court, to do so.

6. I hereby undertake that in case I seeks to withdraw the petition or if I fail to attend the case by myself or through my advocate, I will bear the cost incurred by the respondent and pay such amount of additional costs as may be imposed in the discretion of the court.

Solemnly and sincerely affirm this
the day 19 of September, 2023
and signed his name in my presence.

V. Amrutha

Deponent

BEFORE ME

Cell: 94401 79705 Ph: 0883-2449544

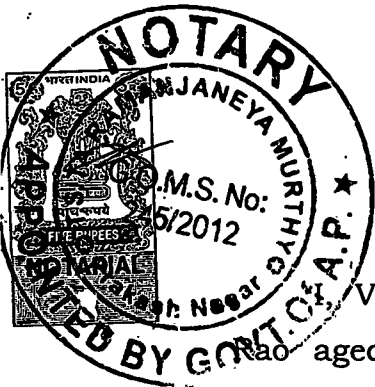
T. SITA RAMANJANEYA MURTHY

ADVOCATE :: AMARAVATI (T.S.R. MURTHY)

ADVOCATE & NOTARY

D.No. 74-6-10, Prakash Nagar,

RAJAHMUNDRY., E.G.Dt.
VERIFICATION STATEMENT



Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101 being the petitioner/ person acquainted with the facts do hereby verify and state that the contents of the above paras of the Affidavit are true and correct to the best of my knowledge.

Hence verified at AMARAVATI on this the day of September, 2023

V. Amrutha

Deponent

50-

HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

WP(PIL).NO.

OF 2022

BETWEEN:

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Aged about 70 years Occ. Advocate
S/o. Vundavalli Venkata Subba Rao
74-6-51, Sravanthi Buildings
Rajahmundry, East Godavari – 533 101
Andhra Pradesh
Aadhar No. 241517672901
Contact No. 9492176747
PAN Card No. ADUPV 5773A
Account No. 10912807403
State Bank of India, Rajamundry
..... Petitioner

AND

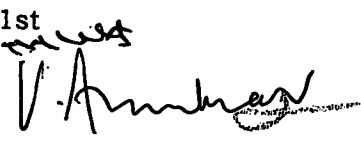
1. The Union of India
Represented by its Secretary,
Ministry of Home Affairs
New Delhi – 110 001
2. The Central Bureau of Investigation rep
By its Director, CGO Complex, Lodhi Road
New Delhi – 110 003
3. The Directorate of Enforcement rep by its
Director, Pravarthan Bhavan, New Delhi – 110 011
4. The State of A.P. rep. by its Principal Secretary
Home Department, Secretariat Buildings,
Amaravati, Guntur, Andhra Pradesh
5. The State of A.P. rep by its Director,
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6. Ghanta Subba Rao, S/o Venkata Ramaiah, 62 yrs., R/o Dhyana hita
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7. Dr. Kodidela Lakshmi Narayana, S/o K.L.Narayana, aged 70 years,
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Nirman Nagar, Shaikpet, Jubilee Hills, Hyderabad

Cell: 9440
T. SITA RAO
ADV. DATE NOTARY
Rakash Nagar,
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19. Directors of M/s Patrik Info Services Pvt.Ltd.
20. Directors of M/s IT Smith Solutions Pvt.Ltd.
21. Directors of M/s M/s. Inweb Services Pvt. Ltd.
22. Project Team Members associated with Mr.SoumyadriShekhar Bose @ Suman Bose's SIEMENS.
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24. Directors of TalentEdge (Arrina Education Services Pvt. Ltd.,)
25. Suresh Goyal, S/o S.R. Goyal, 60 yrs, Residing at P-80, 1st

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- Floor, South Extension Part-II, Andrews Ganj, South Delhi,
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9440179795 PM 9895
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I, Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101, do hereby provide the following information in accordance with 5(a) and (b) of the Public Interest Litigation Rules, 2015.

Personal Details of the Petitioner


1.	Name	:	Vundavalli Aruna Kumar
2.	Postal Address	:	Vundavalli Aruna Kumar S/o Vundavalli Venkata Subba Rao aged about 70 years, Occ: Advocate R/o. 174-6-51, Sravanthi Buildings, Rajahmundry, Andhra Pradesh - 533 101
3.	Mobile No.	:	+919492176747
4.	Proof regarding personal identification	:	AADHAR
5.	Occupation	:	Advocate
6.	Annual Income	:	20 LAKHS Rs. /- per annum
Bank Account Details			
7.	Bank Name	:	State Bank of India

Cell: 9440179705 Ph: 0883-244954
T. SITA RAMANJANEYA MURTHY
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.Dt.

[Handwritten Signature]

54-


8.	Account Holder Name	:	Undavalli Aruna Kumar
9.	Account Number	:	10912807403
10.	Branch	:	Near Kambala Tank, Rajahmundry
11.	PAN Card Number	:	ADUPV 5773A
12.	AADHAR Card Number	:	2415 1767 2901
13.	Email Address	:	<u>Nil</u>



Petitioner Signature

Cell: 9440179705 Ph: 0883
T. SITA RAMANJANEYA M.
(T.S.R. MURTHY)
ADVOCATE & NOTARY
D.No. 74-6-10, Prakash Nagar,
RAJAHMUNDRY., E.G.D.

Ramesh Kar

		FIRST INFORMATION REPORT (Under Section 154 Cr. P.C)			A.P.P.M. Order 470 Form No:
1.	Dist: GUNTUR	P.S: CID PS, A.P., AMARAVATHI, MANGALAGIRI	Year: 2021	FIR No: 29/2021	Date: 09.12.2021
2.	Acts: IPC		Sections: U/S. 166, 167, 418, 420, 465, 468, 471, 409, 201, 109, r/w 120(B) IPC and Sec 13(2) r/w 13(1)(c) and (d) of Prevention of Corruption Act 1988.		
3.	(a) General Diary Reference:	Entry No: Vol - IV		Time: 12.00 hrs	
	(b) Occurrence of Offence:	Prior to 09.12.2021			
	(c) Information received at the Police Station:	09.12.2021 at 12.00 hrs		G.D. Page No.49	
4.	Type of Information:	English typed report			
5.	Place of Occurrence:	3rd floor, Infosight Building, O/o the APSSDC, Tadepalli, Guntur Dist.			
	(a) Direction and Distance from P.S.	5 Km towards North			
	(b) Address:	NIL		Beat No: NIL	
	(c) In case outside limit of this Police Station:	NIL		District: NIL	
6.	Complainant/Informant. Sri K. Ajay Reddy, Chairman, APSSDC, A.P, Tadepalli, Guntur Dist. A.P.				
	(a) Father's Name: - Mara Reddy				
	(b) Date, Year of Birth / Age: - 59 Years				
	(c) Nationality : Indian				
7.	Details of known /suspected / unknown /accused with full particulars.				
	1) Mr. Ghanta Subba Rao, the then Special Secretary to Govt., Skill Development, Entrepreneurship & Innovation Department, and the then Ex-Officio Secretary to Hon'ble Chief Minister, Govt. of A.P.; and MD & CEO of APSSDC,		14) Directors of M/s Patrik Info Services Pvt.Ltd.,		
	2) Dr K. Lakshminarayana, the then Director of APPSSDC		15) Directors of M/s IT Smith Solutions Pvt.Ltd.,		
	3) Mr. Nimmagada Venkata Krishna Prasad, OSD/Spl officer to the then Secretary SDE&I Department		16) Directors of M/s Inweb Services Pvt. Ltd.,		
	4) Design Tech Systems Pvt Ltd, Pune		17) Project Team Members associated with Mr.Soumyadri-Shekhar Bose (i) Suman Bose's SIEMENS		

5) Skillar Enterprises India Pvt.Ltd (formerly known as PVSP IT Skills Projects Pvt.Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)	18) Directors of Knowledge Podium
6) Mr. Soumyadri Shekhar Bose @ Suman Bose, the then Managing Director, SIEMENS Industry Software (India) Pvt.Ltd.,	19) Directors of TalentEdge
7) Mr. Pratap Kumar Kar, Chief Financial Officer, AP State Skill Development Corporation	20) Shri Suresh Goyal, New Delhi
8) Mr.Vikas Vinayak Khanvelkar, Chairman & MD of DesignTech Systems Limited, Pune	21) Shri Manoj Kumar Jain, New Delhi
9) Mr.Sanjay Daga, President of DesignTech Systems Limited, Pune	22) Shri Yogesh Gupta, New Delhi
10) Mr.Mukul Agarwal, Chief Operating Officer, Skillar Enterprises India Pvt. Ltd. (formerly known as PVSP IT Skills Projects Pvt. Ltd.)	23) Shri Sita Ram Arora, New Delhi
11) Mr.Saurabh Garg, Managing Director, Skillar Enterprises India Pvt. Ltd (formerly known as PVSP IT Skills Projects Pvt. Ltd.)	24) Shri Saurabh Gupta, Gurgaon, Haryana
12) Mr.Hirji Kanji Patel, Managing Director, M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)	25) Shri Vipin Sharma, New Delhi
13) Mr.Shirish Chandrakanth Shah, Key Administrator of M/s Allied Computers International (Asia) Ltd., Mumbai (ACI)	26) Shri Sawang Kumar Tolaram Jaju and others
8.	Reasons for delay in reporting by the Complainant/Informant: Nil
9.	Particulars of properties involved: (Attach separate sheet, if required) : Nil
10.	Total value of properties involved: - Misappropriated public funds around Rs. 241 crores.
11.	Inquest Report / Un-Natural Death case No., if any: Nil
12.	<p>F.I.R. Contents (Attached complaint report): The report of Chairman APSSDC dated 07.09.2021, Preliminary Enquiry Report dated 09.12.2021 along with enclosures, received at 12.00 hrs on 09.12.2021 stated that</p> <p>I would like to bring to your notice that the Government has issued orders vide G.O.Ms.No.47 (HE) (EC.A2) Department dated 13-12-2014 incorporating APSSDC.</p> <p>The object of the SIEMENS project/scheme is to impart Hi-end technology to the trainers. APSSDC has deputed a team to visit SIEMENS Centers of Excellence already established in Gujarat and to submit a report. SIEMENS offers training program in collaboration with various State Governments. In the negotiations, the State Government has agreed to establish SIEMENS Centers of Excellence, Technical Skill Development Institutions and Skill Development Centers in different clusters. Each Cluster comprises of one Center of Excellence, five Technical Skill Development Institutions of one Center of Excellence, five Technical Skill Development Institutions and Skill Development Centers. Six such clusters have been formed at the inception at a cost of Rs.546,84,18,908/- 90% and a Government share thereof is 10%- Rs.55 Crores.</p> <p>A MoA has been entered into between APSSDC on one hand and SIEMENS on the other. SIEMENS is a combination of M/s. SIEMENS Industry Software (India) Private Limited and M/s. Design Tech Systems Private Limited. The MoA is in furtherance of G.O.M.S.No.4, dated 30-06-2017 of Skill Development Entrepreneurship and Innovation (Skills) Department.</p> <p>A tax investigation by the Additional Director General, GST, Intelligence, pune in respect of claims of availing of CENVAT credit by M/s.DesignTEch Systems Private Limited and M/s. Skillar Enterprises India Private Limited led to unearthing a huge financial scam involving crores of rupees by M/s. SIEMENS Industry Software India Private Limited and M/s. Design Tech Systems Private Limited. The funds relate to Andhra Pradesh State Skill Development Corporation, Vijayawada (shortly referred to as APSSDC)</p> <p>As per the MoA, DesignTech has to provide training software development including various sub-modules designed for high end software for advance manufacturing CAD/CAM. The MoA does not contemplate sub-contract. However, Siemens and DesignTech had subcontracted a large part of its work to M/s. Skillar Enterprises</p>

Private Limited, New Delhi, with self-centric Solomon's Wisdom. As a matter of fact, Skillar was established after DesignTech had entered into a contract with APSSDC. It is the claim of DesignTech that Skillar has provided training software development including various sub-modules designed for high and software for advance manufacturing CAD/CAM. Skillar has directly supplied the same to the Skill Development Centers in Andhra Pradesh. DesignTech further claims that royalty and subscription were paid to Skillar since they have developed the software. When tax Authorities confronted Skillar, Skillar has claimed that no technical work has been subcontracted and the training software development including various sub-modules provided in the invoices. Thus, the Addl.D.G.G.I., pune concluded that both the service provider and service receiver had taken contradictory stands regarding the nature of services. An in-depth scrutiny into the records by the A.D.G.G.I revealed that training software development including various sub-modules shown as supplied by Skillar to DesignTech were purchased by Skillar from

1. M/s.Allied Computers International (Asia) Ltd., Mumbai (in short M/s.ACI).
2. M/s.patrek Info Services Private Limited, M/s. I.T Smith Solutions Private Limited.
3. M/s.Inweb Info Services Private Limited all based at New Delhi
4. M/s.Arbhant Traders, New Delhi.
5. M/s.G.A.Sales Private Limited, New Delhi.

All these companies are Shell/Defunct companies and they were issuing invoices without providing any services. It is patent that all these companies have formed into a Cartel to siphoning the public funds tuning to Crores of rupees. The Addl. Director General, DGGSTI, Zonal Unit, Pune observed that no services were delivered by Skillar to DesignTech in their invoices depicting training software development including various sub-modules and royalty and subscription thereof. The Managing Director of DesignTech admitted before Asst. Director General that he does not have any evidence to show that services have been received from these companies.

After the financial irregularities have come to surface, directions have been given to APSSDC to conduct a Forensic Audit and to furnish a copy of the report for taking further action. Accordingly, a work order has been assigned to M/s. Sharath and Associates, Chartered Accountants, Forensic Audit Firm. The audit firm conducted an enquiry and submitted a report. The Forensic Audit is concerned with pointing out the flaws in policies, flaws in systems, flaws in utilization of funds and analysis of various spending practices and to find out irregularities, misstatements, governance procedures, internal policies evaluation for the financial years 2014-15 to 2018-19. Various irregularities have been noticed by the team of auditors and the report thereof is self-explanatory.

M/s. SIEMENS and DesignTech have to oversee the functions of the clusters and their maintenance. Instead of doing so both of them swindled crores of rupees in a dubious manner. Their acts affected the marrows of economic health of the State.

As per the Memo No.143741/skill/2021 dated 11.07.2021 and 04.09.2021, the Managing Director, APSSDC is instructed to lodge a report with the Crime Investigation Department to make a detailed probe into the case. I, therefore, lodge this report for taking necessary legal action against the above M/s. SIEMENS and M/s. DesignTech and their bogus shell allies according to Law.

The complainant requested for necessary legal action in this regard. Copy of the complaint is enclosed herewith.

13.	Action Taken:- The report of Chairman APSSDC dated 07.09.2021, Preliminary Enquiry Report dated 09.12.2021 along with enclosures, received at 12.00 hrs on 09.12.2021. As per the instructions of the ADGP, CID, AP., Mangalagiri vide Memo in C.No.1034/C12/CID/2021, dated: 09.12.2021, a case in Cr.No.29/2021 U/S. 166, 167, 418, 420, 465, 468, 471, 409, 201, 109, r/w 120(B) IPC and Sec 13(2) r/w 13(1)(c) and (d) of Prevention of Corruption Act 1988 was registered in CID PS, A.P, Mangalagiri on 09.12.2021 at 12.00 hrs. Original FIR along with the complaint report and enclosures submitted to The Hon'ble 3 rd Addl. Session Judge cum special Judge for SPE & ACB cases, Vijayawada and copy of FIR along with complaint report and enclosure sent to the I.O. Sri M.Dhanunjayudu, DSP, EOW-II, CID, AP, Mangalagiri for the purpose of investigation.
14.	F.I.R. read over to the Complainant / Informant, admitted by him to be correct and a copy of FIR given to the Complainant / informant on free of cost.
15.	Date and Time of dispatch to the Court: 09.12.2021 at 14.00 hrs

K. Vijay
Signature /
Thumb impression
of the Complainant/
information

True copy
[Signature]
M. DHANUNJAYUDU
Dy. Supdt. of Police
EOW-II, CID.,
Mangalagiri
Andhra Pradesh

[Signature] 9.12.2021
Signature of the officer
In charge Police Station with
Name: Sri M Raja Rao, DSP,
SEO, CID, AP, Mangalagiri.
Senior Executive Officer
C.I.D., A.P., Mangalagiri.

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Annexure - 2 83

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07th Sep 2021,
Tadepalli.

To
The Additional Director General of Police,
Crime Investigation Department,
Andhra Pradesh,
Mangalagiri.

Lr.No.: 1790/APSSDC/SIEMENS; Dt: 08.09.2021

Respected Sir,

Sub: Swindling of funds by M/s. Siemens and M/s. DesignTech and their shell/defunct allies by bogus invoices and thereby siphoning of the funds of the Government - Requesting to take action - Reg.

I would like to bring to your notice that the Government has issued orders vide G.O.Ms.No.47 (HE) (EC.A2) Department dated 13-12-2014 incorporating APSSDC.

*Spd - 8/21
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The object of the SIEMENS Project/scheme is to impart Hi-end technology to the trainers. APSSDC has deputed a team to visit SIEMENS Centers of Excellence already established in Gujarath and to submit a report. SIEMENS offers training program in collaboration with various State Governments. In the negotiations, the State Government has agreed to establish SIEMENS Centers of Excellence, Technical Skill Development Institutions and Skill Development Centers in different clusters. Each Cluster comprises of one Center of Excellence, five Technical Skill Development Institutions and Skill Development Centers. Six such clusters have been formed at the inception at a cost of Rs.546,84,18,908/- with Siemens and DesignTech providing a grant-in-aid of Rs.491,84,18,908/- 90% and a Government share thereof is 10% - Rs.55 Crores.

A MoA has been entered into between APSSDC on one hand and SIEMENS on the other. SIEMENS is a combination of M/s. SIEMENS Industry Software (India) Private Limited and M/s. DesignTech Systems Private Limited. The MoA is in furtherance of G.O.M.S.No.4, dated 30-06-2017 of Skill Development Entrepreneurship and Innovation (Skills) Department.

A tax investigation by the Additional Director General, GST, Intelligence, Pune in respect of claims of availing of CENVAT credit by M/s. DesignTech Systems Private Limited and M/s. Skillar Enterprises India Private Limited led to unearthing a huge financial scam involving crores of rupees by M/s. SIEMENS Industry Software India Private Limited and M/s. DesignTech Systems Private Limited. The funds relate to Andhra Pradesh

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State Skill Development Corporation, Vijayawada (shortly referred to as APSSDC).

As per the MoA, DesignTech has to provide training software development including various sub-modules designed for high end software for advance manufacturing CAD/CAM. The MoA does not contemplate sub-contract. However, Siemens and DesignTech had subcontracted a large part of its work to M/s. Skillar Enterprises Private Limited, New Delhi, with self-centric Solomon's Wisdom. As a matter of fact, Skillar was established after DesignTech had entered into a contract with APSSDC. It is the claim of DesignTech that Skillar has provided training software development including various sub-modules designed for high and software for advance manufacturing CAD/CAM. Skillar has directly supplied the same to the Skill Development Centers in Andhra Pradesh. DesignTech further claims that royalty and subscription were paid to Skillar since they have developed the software. When tax Authorities confronted Skillar, Skillar has claimed that no technical work has been subcontracted and the training software development including various sub-modules provided are technical material and royalty and subscription have been wrongly mentioned in the invoices. Thus, the Addl.D.G.G.I., Pune concluded that both the service provider and service receiver had taken contradictory stands regarding the nature of services. An in-depth scrutiny into the records by the A.D.G.G.I revealed that training software development including various sub-modules shown as supplied by Skillar to DesignTech were purchased by Skillar from

1. M/s. Allied Computers International (Asia) Ltd., Mumbai (in short M/s. ACI).
2. M/s. Patrick Info Services Private Limited, M/s. I.T Smith Solutions Private Limited.
3. M/s. Inweb Info Services Private Limited all based at New Delhi.
4. M/s. Arihant Traders, New Delhi.
5. M/s. G.A. Sales Private Limited, New Delhi.

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