

**IN THE HIGH COURT OF DELHI AT NEW DELHI**  
**CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**INDEX**

SL NO.	PARTICULARS	PAGE NO.
1.	NOTICE OF MOTION	1
2.	URGENT APPLICATION	2
3.	MEMO OF PARTIES	3 - 4
4.	SYNOPSIS AND LIST OF DATES	5 - 8
5.	A PUBLIC INTEREST LITIGATION BY WAY OF WRIT PETITION UNDER ARTICLE 226 OF THE CONSTITUTION OF INDIA, INTER-ALIA SEEKING URGENT ISSUANCE OF APPROPRIATE WRIT OF MANDAMUS DIRECTING THE RESPONDENT NO.1 TO ENACT LAWS AND GUIDELINES REGULATING THE CONDUCT OF PRIVATE DETECTIVES ON ACCOUNT OF THEIR CONDUCT BEING IN VIOLATION OF ARTICLE 21 OF THE CONSTITUTION OF INDIA AND OTHER RELIEFS AS SOUGHT IN THE PRAYER CLAUSE ALONG WITH	9 - 38

	SUPPORTING AFFIDAVIT	
6.	<b>ANNEXURE P-1</b> True translated copy of the police complaint dated 10.11.2021 along with its original copy.	39-44
7.	<b>ANNEXURE P-2.</b> A copy of the legal notice dated 17.11.2021 sent to the respondent No.4	45-49
8.	<b>ANNEXURE P-3 (COLLY).</b> Copies of the pictures of websites depicting the advertisements with respect to services provided by AMX Detective Pvt. Ltd	50-55
9.	<b>ANNEXURE P-4 (COLLY).</b> Copies of the pictures depicting the malicious advertisements by various detective agencies in the internet	56-71
10.	APPLICATION U/S. 151 OF CPC, 1908 SEEKING EX-PARTE, AD-INTERIM INJUNCTION ON BEHALF OF THE PETITIONERS ALONG WITH SUPPORTING AFFIDAVIT	72-76
11.	AN APPLICATION U/S 151 CPC FOR EXEMPTION FROM FILING OFFICIAL	77-82

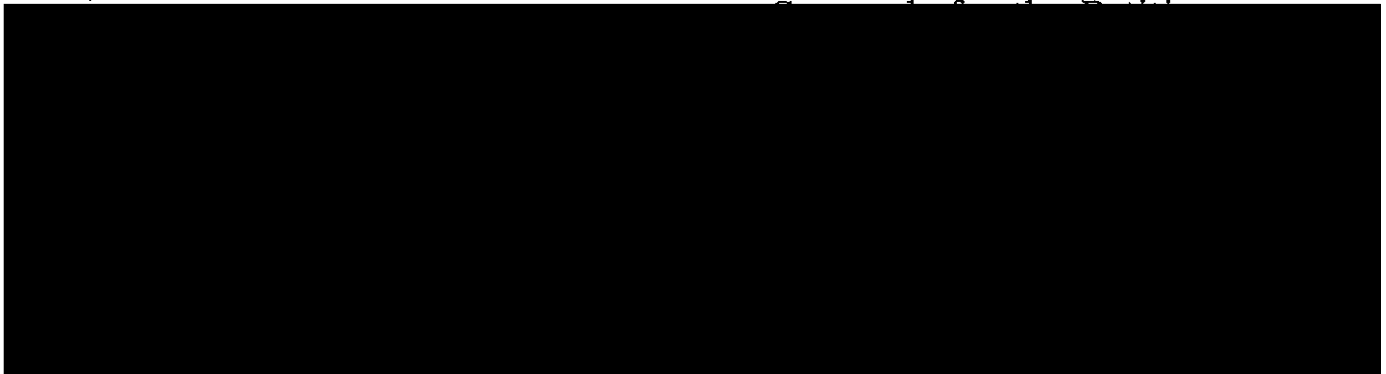
	TRANSLATION OF ANNEXURE ALONG WITH SUPPORTING AFFIDAVIT	
12.	Copy of the Id proof of the Petitioner	83
13.	COURT FEES	84
14.	VAKALATNAMA	85
15.	PROOF OF SERVICE	86-87

**THROUGH**

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**



1

**IN THE HIGH COURT OF DELHI AT NEW DELHI  
CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**NOTICE OF MOTION**

Sir/Madam,

The enclosed writ petition under Article 226 of the Constitution of India in the above mentioned matter is being filed on behalf of the Petitioners and is likely to be listed on 14.12.2021 or any further date thereafter. Please take notice accordingly. This letter is being served as per High Court Rules and necessary instructions issued by the Court from time to time.

Thanking you

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**

Counsels for the Petitioner,

En  
(O):

Place: New Delhi  
Date: 15/12/2021

2

**IN THE HIGH COURT OF DELHI AT NEW DELHI  
CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**URGENT APPLICATION**

To,  
The Deputy Registrar  
Delhi High Court, Delhi  
New Delhi

Sir,

The urgency in the matter is such that the respondent no.4 is causing harassment to the Petitioner by following her everywhere and also engaging goons to follow her in her residence, workplace, etc. Moreover, respondent no.4 is also defaming the petitioner in public by spreading fake rumors about her on persistence of respondent no.3 due to no laws governing the respondent no.4.

Therefore in the interest of Justice, it is most humbly prayed that the matter is listed for hearing as soon as possible.

Thanking you,

**FILED BY**

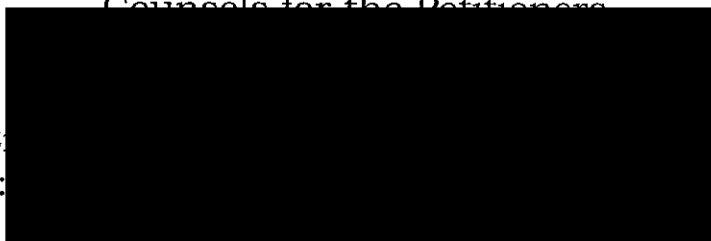
*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**

Counsel for the Petitioner

Place: New Delhi  
Date: 15/12/2021

E  
(O):



**IN THE HIGH COURT OF DELHI AT NEW DELHI  
CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

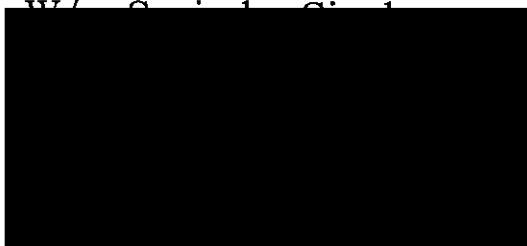
VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**MEMO OF PARTIES**

RADHA BISHT



...Petitioner

**VERSUS**

1. Union of India,  
Ministry of Law & Justice,  
Legislative Department,  
Through its Secretary,  
Fourth Floor, Shastri Bhawan,  
Delhi-110001.  
Email: [uoidhc@gmail.com](mailto:uoidhc@gmail.com)
2. State of NCT of Delhi  
Secretariat Complex, 7<sup>th</sup> Level,  
B-Wing & 5<sup>th</sup> Level, A-Wing,  
I.P. Estate, New Delhi-110002  
Email: [standingcounselgnctd@gmail.com](mailto:standingcounselgnctd@gmail.com)
3. Surender Singh  
S/o. Kamla Devi,  
R/o. House no. 421, C Top Floor,  
Govind Puri Gali no.5,  
New Delhi-110019  
Mob: **NA**

Email: **NA**

4. Bajaj Detective Agency  
Through its Proprietor,  
Pooja Bajaj  
E-76, First Floor, Main Road 78,  
Punjabi Bagh, Central Market,  
Delhi -110026  
Mob: **NA**  
Email: **NA**

...Respondents

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**

Counsels for the Petitioners



Place: New Delhi

Date: 15/12/2021

**IN THE HIGH COURT OF DELHI AT NEW DELHI**

**CIVIL WRIT PETITION NO.\_\_\_\_ OF 2021**

**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**SYNOPSIS**

The present (PIL) Public Interest Litigation is preferred by the Petitioner seeking this Hon'ble Court to take cognizance of the fact that due to the Private Detective Agencies (Regulation) Bill of 2007 being pending in the parliament for the last 13 years, it has fell through and expired, therefore there is no law governing the activities of private detectives and their agencies. Due to such absence of any law governing the activities of private detectives, people being victim of abuse, people violated of their right to privacy, people being cheated or offended otherwise, have no statutory law to invoke against the agencies and make them liable. Such inability to make private detective agencies liable before any court of law or



authority enable them to operate in any manner which they feel to be suitable for themselves.

A work of a private detective lacking accountability with respect to its *modus operandi* enables violation of fundamental rights of the citizens of this Nation enriched under Article 21 of the Constitution of India. The petitioner like many others, is a victim of unregularized activities of a private detective appointed by the respondent no.2/her husband who is stalking her, violating her privacy and defaming her in public.

**LIST OF DATES & EVENTS**

<b>DATES</b>	<b>EVENTS</b>
2005	Petitioner was subjected to domestic violence by her husband/respondent no. 3 after their marriage.
2007	The Private Detective (Regulation) Bill, 2007 presented before the parliament but fell through and failed.
September 2021	Respondent no.3 appointed a private detective, namely Pooja Bajaj (respondent no. 4.) to tail the Petitioner. Respondent no.4/Pooja Bajaj (private detective) started following the Petitioner herself and in the process defamed her and violated her right to privacy in public. Respondent no. 4 even went to the extent of sending goons after the Petitioner who followed her everywhere she went.

13.09.2021	Petitioner filed a complaint to the women's cell against the respondent nos. 3 and 4.
25.10.2021	Petitioner filed a domestic violence complaint bearing CT no. 1466 of 2021 pending before the Ld. MM, Tarunpreet Kaur, Saket District Court against the respondent no.3 and his family members.
15.12.2021	Hence the Present PIL.

**IN THE HIGH COURT OF DELHI AT NEW DELHI**  
**CIVIL WRIT PETITION NO.\_\_\_\_ OF 2021**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**A PUBLIC INTEREST LITIGATION BY WAY OF WRIT  
PETITION UNDER ARTICLE 226 OF THE  
CONSTITUTION OF INDIA, INTER-ALIA SEEKING  
URGENT ISSUANCE OF APPROPRIATE WRIT OF  
MANDAMUS DIRECTING THE RESPONDENT NO.1  
TO ENACT LAWS AND GUIDELINES REGULATING  
THE CONDUCT OF PRIVATE DETECTIVES ON  
ACCOUNT OF THEIR CONDUCT BEING IN  
VIOLATION OF ARTICLE 21 OF THE  
CONSTITUTION OF INDIA AND OTHER RELIEFS AS  
SOUGHT IN THE PRAYER CLAUSE**

TO

THE HON'BLE CHIEF JUSTICE AND HIS COMPANION  
JUSTICES OF THE HIGH COURT OF DELHI.

THE HUMBLE PETITION OF THE PETITIONER  
ABOVE NAMED.

**MOST RESPECTFULLY SHOWETH:**

1. That the Petitioner is filing the present Writ Petition in Public Interest and has no personal interest in the litigation and the petition is not guided by self-gain or for gain of any other person/ institution/body and that there is no motive other than that of public interest in filing the writ petition.
2. That the source of knowledge of the facts alleged in the writ petition is the Petitioner personally who have been a victim like many other citizens of the nation, by the atrocities of private detectives due to their unregulated modus operandi.
3. That present writ petition is filed for the benefit of every citizen who has been a victim of unregulated acts and modus operandi of the private detectives.
4. That the present writ petition is likely to effect the private detective and private detective agencies because of the framing of new guidelines for their regularization. As it is not possible to implead all the private detectives and private detective agencies, only

one detective agency has been impleaded herein because of who's activities the petitioner has been victimized to atrocities. Relief is sought against the State to frame laws/guidelines in order to regularize the activities of the private detectives and private detective agencies.

5. The petitioner is a 12<sup>th</sup> Pass undergraduate woman. She is also a working class woman, who runs a boutique shop. Due to the atrocities of private detectives, she has been subjected to harassment. Alike her, many other citizens of the Nation are victim of the modus operandi of private detectives since there is no law enacted by the State to regulate the same.
6. That the present (PIL) Public Interest Litigation is preferred by the Petitioner seeking this Hon'ble Court to take cognizance of the fact that due to the Private Detective Agencies (Regulation) Bill of 2007 being pending in the parliament for the last 13 years, it has fell through and expired, therefore there is no law governing the activities of private detectives and their

agencies. Due to such absence of any law governing the activities of private detectives, people being victim of abuse, people violated of their right to privacy, people being cheated or offended otherwise, have no statutory law to invoke against the agencies and make them liable. Such inability to make private detective agencies liable before any court of law or authority enable them to operate in any manner which they feel to be suitable for themselves. Therefore, no other remedy is available with the Petitioner but to approach this Hon'ble Court of law.

7. A work of a private detective lacking accountability with respect to its *modus operandi* enables violation of fundamental rights of the citizens of this Nation enriched under Article 21 of the Constitution of India. The petitioner like many others, is a victim of unregularized activities of a private detective appointed by the respondent no.3/her husband who

stalked her, violated her privacy and defamed her in public.

8. The Petitioner was subjected to domestic violence by her husband/respondent no. 3. Respondent no.3 appointed a private detective, namely Pooja Bajaj (respondent no. 4.) to tail the Petitioner.
9. The Respondent no.4/Pooja Bajaj (private detective) started following the Petitioner herself and in the process defamed her and violated her right to privacy in public. Respondent no. 3 even went to the extent of sending goons after the Petitioner who followed her everywhere she went.
10. Respondent no. 3 even went to the extent of defaming the Petitioner by spreading false rumours about her in her neighbourhood in her absence. The Petitioner owns a boutique and therefore has to visit her client's residence sometime. The respondent no. 4 even followed Petitioner to her client's residence and after the Petitioner left enquired about her from the clients.



11. It is also pertinent to mention herein that the respondent no.3 has created a fake email id and sent email to the Petitioner's workplace. Moreover, the Respondent no.4 through her agents have clicked multiple photographs of the Petitioner. In K.S. Puttaswamy v. Union of India (2017) 10 SCC, the Supreme Court defined the concept of 'informational privacy' wherein any personal information with the potential to affect the right to privacy of an individual shall be restricted. In the instant case, the respondent no 4 clicking photographs and tracking movements of the petitioner amounts to violation of the concept of 'informational privacy'.
12. Respondent no. 3 in connivance with respondent no.4 has devastated the Petitioner's life by intruding her privacy in all aspects, personal and professional. The petitioner also filed a police complaint to that effect and further sent a legal notice to the respondent no.4. But till date no action has been initiated by the police.

True translated copy of the police complaint dated 10.11.2021 along with its original copy are annexed herewith as **ANNEXURE P-1**. (Pgs 39 to 44)

A copy of the legal notice dated 17.11.2021 sent to the respondent No.4 is annexed herewith as **ANNEXURE P-2**. (Pgs 45 to 49)

13. Due to no law governing the activities of private detectives, Petitioner is unable to resort to any authority with her grievance.
14. These difficulties are not only faced by the Petitioner but also by the whole of public who are victims of such illegal activities conducted by private detectives.
15. That the Petitioner is an aggrieved person, who has been physically, mentally, emotionally and financially abused by her husband who has stooped low enough to hire a private detective to tail her and harass her and intimidate her. He has also hacked into her phone and illegally recorded her conversations with the

intent to misuse them. The Private Detective on her part has strayed away from her course of employment i.e., informing the Petitioner's husband of her whereabouts and has made the same public to other associates of hers and the Petitioner's husband's associates. The Private detective has further defamed the Petitioner in her locality where she lives and carries out her business venture i.e., running a small boutique to supplement her income and ensure the subsistence of herself and her two young children. It is on part of the intrusive and criminally intimidating behaviour of the Private Detective due to which the Petitioner has come to the doors of this Hon'ble Court to seek relief and get the justice that she is entitled to.

16. On surfing through the internet, one observes that there are innumerable free lancers and private detective agencies which take pride in the crafty ways in which they bend and break the law to track others. There even exists a speciality in the sphere of private

detectives who specialize in video, audio and data surveillance. They brag about their extensive collection of spyware, and their ability to manipulatively hide it in a person's surrounding or on their body as well. Other than that, there is the opposite as well, a specialization in debugging i.e. hunting for and picking out already planted spyware. For instance one institution by the name of AMX Detectives advertises that "Surveillance Detectives/ Investigators in India with the help of lady Detectives in Delhi, NCR, and other part of Country utilize undercover vehicles that are equipped with covert video and still cameras and this allows us to get closer to any given subject then normal situations would allow. Similarly, the Video Surveillance Detectives in Delhi, Mumbai, Bangalore, Chennai, Punjab, Chandigarh, Kolkata have covert equipment that allows our operatives to obtain evidence at close quarters, e.g. in meetings, restaurants etc."

Copies of the pictures of websites depicting the advertisements with respect to services provided by AMX Detective Pvt. Ltd. are annexed herewith as

**ANNEXURE P-3 (COLLY).** (Pgs 50 to 55)

17. That there are many other detective agencies who advertise themselves in the internet. They offer various services. But none of their activities are monitored. Using spy cams and obtaining photos and videos of persons without their consent is a violation of their right to privacy. Furthermore, many a times the information provided by a private detective agency is completely wrong and incorrect which misleads the client into believing something to be true which is not. For instance, if a man meets his female friend/colleague after office hours just to talk casually for a walk while going back towards the metro or car parking and a private detective hired by his spouse/wife, takes a picture of them talking and smiling and presents it before the wife stating that he

is having an affair with that lady. The wife might be misled and further induced into spending more money on the agency to avail more evidences. Thus these activities of the private detective agencies are not only harmful for the person whom they are hired to tail but also harmful for the person who hires them since there is no authenticity in the information provided by these unregulated detectives.

18. That there are many other detective agencies which portray similar advertisements about their services which are not tolerant towards citizen's fundamental rights. A simple search in internet will portray these various agencies and their advertisements.

Copies of the pictures depicting the malicious advertisements by various detective agencies in the internet are annexed herewith as **ANNEXURE P-4 (COLLY)**. (Pgs 56 to 71)

19. The Private Detective Regulation Bill, 2007 inter alia provided for constitution of Central Board which was

intended to regulate the functions of Private Detectives Agencies. Section 3 of the Bill prescribed the Constitution of the Central Board. Section 4 sets out the powers and functions of the Central Board. Section 5 of the Bill also provide for the establishment of the State Board. The functions of the State Board are more or less similar to that of the Central Board. Section 9 of the Bill prescribed the qualifications and disqualifications for a person to be licensed as a Private Detective. Unfortunately, it is also stated that, the Bill eventually fell through and the same expired.

20. Thus, pending the passage of this Bill, this Hon'ble Court may, in exercise of its constitutional powers, frame appropriate guidelines to regulate this business. This Hon'ble Court may consider passing the following directions. Constituting a State Board, comprising of a member from the Judiciary, from the Sate Home Department, a member from the State Intelligence Department, a member from the State Police

Department; a nominee member from the State NHRC and two eminent personalities. Two of the members of this Board should be women. The State Board may have the same functions as those mentioned in this Bill including licensing, collecting and maintaining information, etc. Information should be sent to the Board once in two months. A general direction that detectives in all cases, where they are giving evidence, must disclose the modus adopted by them in collecting the evidence, which modus may also be a part of evidence is given. While this does not make the evidence itself inadmissible as the fruits of a poisonous tree doctrine is not applicable in India, the need to disclose and the possible liability ensuing therefrom will act as a deterrent against agent excesses.

21. That in view of the above, the present petition has been filed inter-alia, on the following grounds:



**GROUND**

- A. Because due to the Private Detective Agencies (Regulation) Bill of 2007 being pending in the parliament for the last 13 years, it has fell through and expired, therefore there is no law governing the activities of private detectives and their agencies. Due to such absence of any law governing the activities of private detectives, people being victim of abuse, people violated of their right to privacy, people being cheated or offended otherwise, have no statutory law to invoke against the agencies and make them liable. Such inability to make private detective agencies liable before any court of law or authority enable them to operate in any manner which they feel to be suitable for themselves.
- B. Because it is rather shocking that a very important bill which attempted to regulate the profession of Private Detectives, which often involves violations of Human rights, was allowed to expire without the transforming in to an enactment. However, the need of

the hour is that some concrete measure to regulate the profession of Private Detectives should be taken. Since the matter involves the right to carry on the profession by the Private Detectives as well as the Human Rights of the subjects, who are subjected to surveillance by other individuals who often attempt to invade their privacy, the matter has to be dealt with by this Hon'ble Court as a Public Interest Litigation.

- C. Because Private detective agencies take pride in how adept they are at planting spy ware like cameras, mics, transmitters etc in the homes, cars and working premises of an individual through which they can keep track of each and every activity of the victim. Furthermore, these private detectives and investigators also resort to illegal activities such as hacking into email accounts, social media platforms and illegally tapping into the phones and other devices of the victim. It has been held by the Hon'ble Supreme Court of India in the case of **PUCL v Union of India**, **AIR 1997 SC 568** that it is only the Government who

can intercept information conveyed via calls, under powers conferred to them under Section 5(2) of the Indian Telegraph Act, 1885 as per the procedure given under Section (7)(2)(b) of the Indian Telegraph Act, 1885. The judgment further dictates that the government may only intercept phone calls only in exceptional circumstances when there is a strong apprehension of some unlawful activity taking place or there being a threat to national security or public harmony.

- D. Because even in our counterparts and fellow common law countries such as the United States and Canada, there is roust legislation governing the entry into the profession of private investigation and a strict code of conduct which has to be adhered to. The Private Detective and Investigative Services Act of 2005 sets out parameters for enrolment as a private detective along with penalty for breaking the code of conduct and a review board which is supposed to monitor the activities of private detectives. The Personal

Information Protection and Electronic Documents Act (PIPEDA), 2002 of and the Privacy Act, 1983 of Canada set out the powers and procedures for state and non-state entities to gather information on private citizens of the country.

- E. Because there is also no regulation for the spyware which is being used by private detective agencies to track people and intercept their information. As stated above, under Section 5(2) of the Indian Telegraph Act, only the state has the authority to intercept information being passed on to a person via electronic means, however due to lack of regulation of sale of spyware such as transmitters, spy cameras, disguised audio and video recorders, microchips etc, it is very easy for a regular civilian to hack into someone's life and siphon off their personal details and information. As has been the case with the Petitioner in this case. Her phone had been hacked via a microchip of sorts due to which a third party was able to keep a track of her call records and even the substance of her

conversations. The keeping track of call records through electronic means is clear violation of Section 69 of the Information Technology Act, 2000 as only the state or its authorities are empowered to intercept, monitor or decrypt any information.

- F. Because currently there are no laws governing the field of private investigators which is repercussions to both the people involved in the profession and the people who are being targeted by such professionals. The lack of regulation of the sphere makes it difficult for judicial authorities to not only check their conduct but also to protect private detectives from agencies which under pay these people. The lack of a uniform, approved curriculum or formal authority regulating the entry onto this profession, it is extremely easy for an unqualified person to get a job at an agency for a lower pay thus snatching the opportunity from a deserving candidate who is entitled to a livable wage.
- G. Because the petition, if allowed, would benefit the citizens of this country and ensure their right privacy

under Article 21 of the Constitution of India. That the persons affected by such inaction on part of the State are numerous and are not in a position to approach this Hon'ble Court hence the Petitioner is filing the present PIL on behalf of such affected persons.

H. Because it has been held in a catena of judgments, this Hon'ble Court and Hon'ble High Courts of India has stated that the "State is Duty Bound to protect the Fundamental Rights of its citizens." Keeping this in mind the State is bound by law to protect its citizens' right to privacy and therefore, the Petitioner is justified in approaching this Hon'ble Court to issue directions under the appropriate writ of Mandamus, thus directing the state to develop a mechanism to regulate the conduct of private detectives and the sale of spyware.

I. Because on surfing through the internet, one observes that there are innumerable free lancers and private detective agencies which take pride in the crafty ways in which they bend and break the law to track others.

There even exists a specialty in the sphere of private detectives who specialize in video, audio and data surveillance. They brag about their extensive collection of spyware, and their ability to manipulatively hide it in a person's surrounding or on their body as well. Other than that, there is the opposite as well, a specialization in debugging i.e. hunting for and picking out already planted spyware. All these activities are a violation of the right to privacy of citizens. Additionally, the sale & purchase of the surveillance/investigation/detective equipment, i.e. commonly used spy cameras, spy wall listening device, spy keyloggers etc., needs to be regulated through appropriate authority of the State.

- J. Because there are also detective agencies which take pride in the process of catfishing other people to gather information about them. Catfishing is the process of adopting a fake persona, generally through the online mode and then luring the other party in a relationship with the intent to steal their private

information. Also, there are detectives who conduct loyalty tests. One agency, Sleuths India, boldly advertises that “we introduce an undercover agent into the life of your partner with the purpose to check their faithfulness. You can always trust us to bring the type of evidence you need and also prove the type and intensity of the involvement of your partner.” However, their shameful activities do not stop at this juncture, they also use similar tactics by sending people who pretend to be part of the LGBT+ community and proposition the person who is being ‘tested’ to gather evidence about their sexual preferences. They further take pride in setting up sting operations wherein people are lured into stating an act which the other party wants the victim to confess, most of the times this is accompanied with audio and video recording of the same which is done without the knowledge of the victim. The Hon’ble Court in *Court on its Own Motion v. State*, 146 (2008) DLT 429 decided on validity of a sting operation



ordered that 'those who mount a sting operation themselves commit the offence of impersonation and criminal trespass under false pretense'. The information collected by such methods is personal in nature and is something which only the person to whom such information pertains, has a right to disclose. Due to no legal definition of sting operation provided anywhere, there is no statutory clarity over the definition of the term but any deceptive investigation process is termed as sting operation in common parlance. In the instant case, going by the commonly accepted definition of the term, the respondent no 4 has been involved in a sting operation carried upon the petitioner. The respondent no 4 shall be held liable according to the above stated order.

- K. Because India has signed and ratified both the United Nations Declaration of Human Rights, 1948 and the ICCPR, 1966 in 1977 both of which provide for protection of individual's Right to Privacy.

- L. Because the private investigators have unbounded powers due to lack of statutory limitations. They are free to employ any medium to extract their required information. They can even employ hackers or themselves and hack into the computers or phones of any person and access all kinds of sensitive information. Information including bank account details, ATM password, credit/debit card details, etc. can be easily be traced by the hackers.
- M. Because these private investigators can track all movements of an individual. They can install equipment in any appliance or place surveillance cameras in the person's room/residence. A person's room is said to be the personal space of that person and they often engage in some private act in their room which can be captured by the investigator in the installed equipment. This can lead to further transmission of such material and further violating Section 67A of Information Technology Act, 2008.

- N. Because lack of regulation of private detectives and their agencies has emboldened them to flout the law by illegally tapping phones and electronic communication, stalking people, catfishing them, meeting them under false aliases, posing as police officials to extort information out of them and commit multiple other illegal activities to meet their ends. This in turn has become a major law and order issue.
- O. Because this Hon'ble Court being a Court of Justice, has a duty to safeguard the fundamental rights of the citizens of this Nation, when other organs of a democratic state (Legislature and Executive) fails to ensure protection to its subjects.
- P. Because the record of identity of the private investigators is not published anywhere and they could be foreign nationals putting the national security at stake. The espionage operations could be undertaken in the veil of private investigators agency been established in enemy lands. Those nationally

eminent persons having access to national sensitive data could be spied on.

- Q. Because the private investigators have a regular job being employed by agencies. Article 19(1)(g) of the Constitution guarantees the freedom to practice any profession, or to carry on any occupation, trade or business according procedure established by law. Despite them being acting in the course of their employment, they go beyond the reasonable restrictions laid down under Article 19(6) of the Constitution of India. The grounds for limitation include interests of the general public and in the job of private investigation, the covert operation of spying majorly effects the interests of the general public.
22. That the Petitioner has not filed any other similar petition or application before this Hon'ble Court or before any other court of law, seeking same or similar relief.
23. That the Petitioner has the means to pay the cost imposed upon her, if any, by this Hon'ble Court.

**PRAYER:**

In view of the above, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:-

- A. Issue appropriate Writ of mandamus, Order or Direction thereby directing the respondent no.1 to enact laws and guidelines regulating the conduct of private detectives on account of their conduct being in violation of Article 21 of the Constitution of India.
- B. Direct the respondent no.1 to constitute a State Board, comprising of a member from the Judiciary, from the State Home Department, a member from the State Intelligence Department, a member from the State Police Department, a nominee member from the National Human Rights Commission of India and two eminent personalities.
- C. Pass any other order or direction as this Hon'ble Court may deem fit and proper in the facts and

circumstances of the case and in the interest of  
Justice.

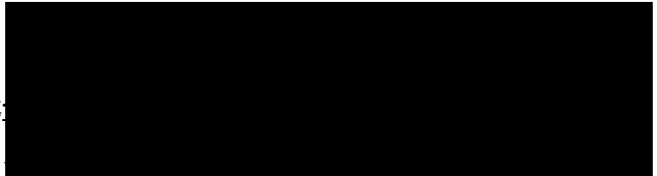
**AND FOR THIS ACT OF KINDNESS, THE PETITIONER  
AS IN DUTY BOUND SHALL EVER BE GRATEFUL**

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**  
Counsels for the Petitioners,

E  
(O)



Place: New Delhi  
Date: 09/12/2021

**IN THE HIGH COURT OF DELHI AT NEW DELHI**

**CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

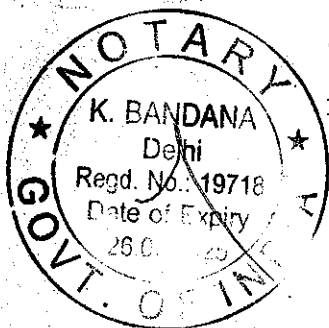
VERSUS

STATE OF NCT OF DELHI & ORS. ...RESPONDENTS

**AFFIDAVIT**

I, Radha Bisht, w/o Surinder Singh, aged about 36 years, R/o. House No. 113, Ground Floor, Balmukand, Khand Giri Nagar, Kalkaji, Delhi-110019., do hereby solemnly affirms and declare as under:-

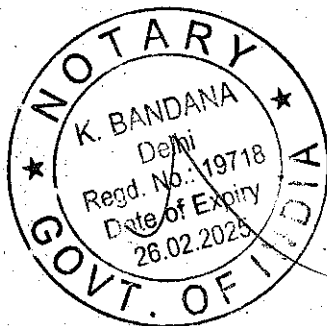
1. That I am Petitioner in the above said matter and am conversant with the facts and circumstances of the case, as such competent to swear this affidavit.
2. That I have filed the present petition as a Public Interest Litigation.
3. That I have gone through the Delhi High Court (Public Interest Litigation) Rules, 2010 and do hereby affirm that the present Public Interest Litigation is in conformity thereof.
4. That I have no personal interest in the litigation and neither myself nor anybody in whom I am is interested would in any manner benefit from the



relief sought in the present litigation save as a member of the general public. This petition is not guided by self-gain or gain of any person, institution, body and there is no motive other than of Public interest in filing this petition.

5. That I have done whatsoever inquiry/investigation which was in my power to do, to collect all data/material which was available and which was relevant for this court to entertain the present petition. I further confirm that I have not concealed in the present petition any data/material/information which may have enabled this court to form an opinion whether to entertain this petition or not and/or whether to grant any relief or not.

6. That I have read the accompanying writ petition containing pages 1 to 38 and para 1 to 22, Synopsis/List of dates, pages 5 to 8, of the grounds based on the knowledge derived from official record, based on legal advice, and understood the contents thereof. The facts stated there are true and correct to the record of the case which I believe to be true.



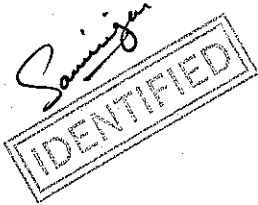


38

7. That the Annexures filed herewith are true copies of their respective originals.

*Radha Rishi*

DEPONENT



**VERIFICATION:-**

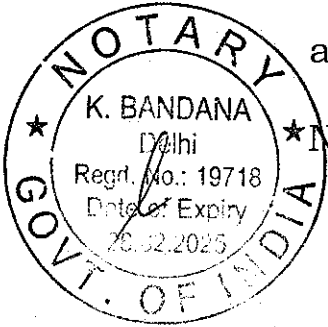
08 DEC 2021

Verified at New Delhi on this \_\_\_ day of

December, 2021 that the contents of affidavit are true

and correct as per knowledge derived from records.

Nothing material has been concealed therefrom.



*Radha Rishi*

DEPONENT

CERTIFIED THAT THE DEPONENT  
Sh./Smt./Km. *Radha Rishi*  
S/o W/o *Sunil Kumar Singh*  
R/o .....  
Identified by Shri/Smt. *Preethi Singh Adv.*  
has solemnly affirmed before me at Delhi  
on *08 DEC 2021* SL No. *23*  
that the contents of the affidavit have  
been read Over & explained to him/her  
& correct to his Knowledge.

NOTARY



सेवा में

श्रीमान एस० एच० ओ० महोदय जी  
पुलिस थाना गोविन्द पुरी  
नई दिल्ली - 110019

CC No-  
DT 10-11-21



विषय:- मेरे पति के द्वारा अलग रहने, घरेलू हिंसा का केस दर्ज करवाने के बावजूद मेरे व मेरे एक बेटा का खुद व अपने महिला मित्र व पुरुष मित्र से पीछा करवाने, मुझे आयेदिन कहीं पर भी परेशान करने व तरह - तरह का मेरे व मेरे बेटे के खिलाफ साजिस करने के सम्बन्ध में शिकायत।

महोदय

सविनय निवेदन यह है कि मैं राधा बिष्ट, निवासी-113 बी० एम० के० गीरी नगर, कालका जी, नई दिल्ली में अपने एक बेटा के साथ रहती हूँ। मेरा और मेरे पति आपसी मदभेद की वजह से हम अलग अलग रहते हैं। मेरे पति सुरेन्द्र सिंह के खिलाफ मैं पहले भी कई दफा इसी थाने में कम्प्लेन कर चुकी हूँ। वह जुओं और शराब के पुरा घर घरबन्द कर चुका है और मारपीट भी करता था। अभी वह 3 महीने से अपनी माँ के साथ रह रहा है। और किसी ना किसी बहाने से मुझे परेशान करने की कोशिस करता रहता है। उसने पिछले 3 महीने से एक महिला और जिसका नाम पूजा बजाज है उसके साथ मिलकर मेरे पीछा करवाता है। मैं जहाँ जाती हूँ वह पूजा या उसका कोई दोस्त मेरा पीछा करते है। पूजा एक डिटेक्टिव एजेंसी चलाती है। और मेरे पति को झूठी - झूठी खबरे देकर मुझे मानसिक रूप से परेशान करती है। मेरे गैर मौजूदगी मे मेरे घर के बाहर आकर मेरे खिलाफ गलत अफवाहे फैला रहा है मेरे ऑफिस मे भी फैंक ई-मेल आई० डी० बना कर मेल करती है। एक उसका दोस्त हरदीप सिंह ररोजाना मेरा पीछा करते हैं मेरी फोटो खिचते हैं। मैं एक छोटा सा बुटीक चलाती हूँ जिसके चलते मुझे अपने क्लाइंट के घर भी जाना पड़ता है। पूजा मेरे पीछे से मेरे क्लाइंट के यहाँ जाकर मेरे बारे मे पूछताछ करती हैं जिने की मुझे अपने और अपने बेटे की सुरक्षा को लेकर चिंता बनी हुई है। कृपा कर मेरी मदद करे और पूजा के खिलाफ सख्त से सख्त कार्यवाही करे। मेरे पति पर मैं महिला पुलिस विभाग मे भी कम्प्लेन कर चुकी हूँ। मेरी सारा और पति मिल कर कालाजादू करते है, जिसके सबूत भी मैं महिला पुलिस विभाग मे कर दिखा चुकी हूँ।



हिंसा का शिकायत दर्ज कर चुकी हूँ। मेरा पति पहले भी क्रिमिनल एक्टिविटी में लगे हुए हैं। बहुत गरम मिजाज का आदमी है। मेरा सारा जैवर बेच कर जुआ खेलता है। मुझे अपनी सुरक्षा की चिंता है क्योंकि बच्चों की जिम्मेदारी भी मुझ पर है मेरे बच्चे हैं। एक बच्चा बोर्डिंग स्कूल में पड़ता है। एक मेरे पास है। जिसको मुझे कई बार घर पर डोड़ कर काम पर जाना पड़ता है। मेरे पति और पूजा बजाज की ऐसी मेरा पीछा करने ने मुझे मेरे बेटे की चिंता रहती है। मैं पूरे दिन स्कूटी में काम करती हूँ और कई दिनों से अलग - अलग कार या बाईक मुझ और टेक ऐसे कर रही है जैसे की मेरा एक्सिडेंट कराना चाहती। प्लीज आपसे निवेदन है पूजा बजाज पर सख्त से सख्त कार्यवाही करे। महोदय अगर मुझे व मेरे बेटा को कुछ होता है तो इसका पूर्णरूप से जिम्मेदार मेरा पति व उसका महिला मित्र पूजा बजाज व अन्य मित्र होगा।

अतः महोदय से विनम्र निवेदन करती हूँ कि मेरे उपरोक्तलिखित शिकायत को ध्यान में रखते हुए मेरे पति व पूजा बजाज व अन्य पर सख्त से सख्त कानूनी कार्यवाही करे। जिससे मैं और मेरा बच्चा सुरक्षित रह सकु। आपका अति कृपा होगा। इस कृपा के लिए मैं श्रीमान का सदा आभारी रहूँगी।

धन्यवाद

पूजा का पता और फोन नं०-

E-76, First Floor, Main Road,  
Punjabi Bagh, Central Market,  
New Delhi - 110026  
Mob:- 7821818976

प्रार्थिनी

राधा बिष्ट,  
निवासी-113 बी० एम० को०  
गीरी नगर,  
कालका जी, नई दिल्ली  
मो० नं०-7065183194



ANNEXURE P/1

41

Dated : 10.11.21


To,

The S.H.O.  
Police Station Govind Puri  
New Delhi - 110019

Sub: Complaint regarding my husband's residing separately, chasing me, sending his female friend and male friend behind me and my son despite my lodging the case of domestic violence, causing every day harassment and hatching conspiracies against me and my son.

Sir,

It is respectfully submitted that I, Radha Bisht, reside at 113, BMK Giri Nagar, Kalkaji, New Delhi alongwith my one son. Due to some dispute, I am residing separately from my husband. I have made number of complaints earlier also at this Police Station against my husband Surender Singh. He has ruined

  
T.G

42

entire house due to addiction of gambling and liquor and he also used to beat me. For the last 3 months he is residing with her mother and tries to harass me for one reason or another. For the last 3 months, he sends a lady namely Pooja Bajaj behind me to chase me. Pooja or her friends chase me. Pooja is running a detective agency, she gives false information to my husband and harasses me. In my absence, they come outside my house and spread fake rumours. She also sends mail at my office from fake email ID. One of his friend Hardeep Singh chases me every day and takes my photos. I run a small boutique, due to which I use to go at the houses of my clients. Pooja uses to go at the houses of my clients in my absence and makes enquiry. Due to all this, I am worried about my and my son's safety. Kindly help me and take strict action against Pooja. I have already made a complaint with Mahila Police department against my husband. My mother-in-law and husband use black

  
T.C.

43

magic, proof of which has already been shown by me to the Mahila police department. I have also got registered the case of domestic violence against him. My husband has remained involved in criminal activities. He is a man of loose temper. He has sold my entire jewellery for playing gambling. I am worried about my safety. My children are also dependent on me, one child is studying at Boarding school, another is with me. I use to leave him at home sometimes while going for work. My husband and Pooja Bajaj chase me, due to which I am worried about my son. I use to go on scooty and for the last many days, different Cars or Bikes overtake me in the manner that they want to cause my accident. I request you to take strict action against Pooja Bajaj. Sir, if anything happens with me and my son, my husband and her female friend Pooja Bajaj will be fully responsible for the same.

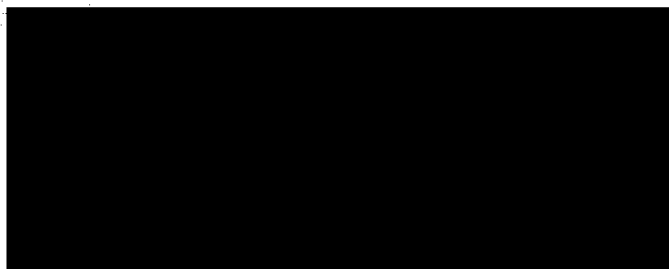
T.C.

44

Therefore, I request you that in view of my above-mentioned complaint, strict legal action may be taken against my husband and Pooja Bajaj, so that I and my son may live safely. I shall be highly obliged for your this act.

Thanking you,

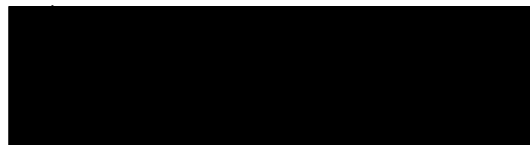
Address & Phone number of Pooja



Applicant,

Radha Bisht

  
T.C.




17<sup>th</sup> November, 2021

To,  
**MS.POOJA BAJAJ**  
E-76, Fast Floor Main Road 78,  
Punjabi Bagh, Central Market,  
New Delhi-110026.

**SUBJECT: LEGAL NOTICE**

Under the instructions from and on behalf of Ms. Radha Bisht W/o Surinder Singh R/o House No. 113, Ground Floor, Bal Mukund, Khandgiri Nagar, Kalkaji, Delhi (hereinafter referred to as My Client), I hereby serve upon you, the Addressee with the following Legal Notice, the contents whereof you may please note and act accordingly:-

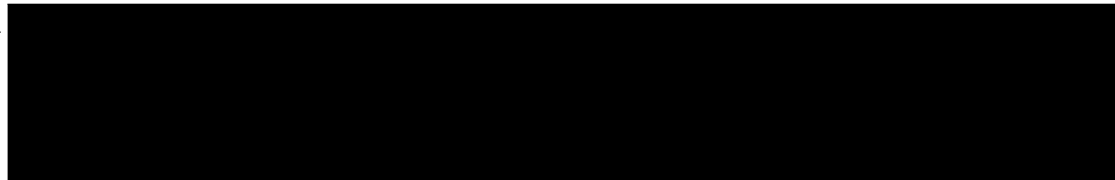
- 
1. That you, the addressee have a private detective agency, having its office at E-76, Fast Floor Main Road 78, Punjabi Bagh, Central Market, New Delhi-26.
  2. That owing to the matrimonial dispute which is going on between my client and her husband, my client's husband has hired you, the addressee to keep constant surveillance on My Client.

(1)

Residence: C-78, Neeti Bagh, August Kranti Marg, New Delhi-110049

  
T.C.





3. That since August 2021, you, the addressee have been following, taping and tracking my client in person as well as via phone calls under the instructions of my client's husband. That due to such an intimidating act of you, the addressee, My Client is living under the constant threat to her life since the time she has discovered that you, the addressee and your aids have been stalking and following my client wherever she goes.
4. That in furtherance of information which is being provided by you, the addressee to My Client's Husband, he is spreading false and frivolous rumours in the neighbourhood in order to defame and harass My Client.
5. That you, the addressee in connivance with My Client's husband have been speaking ill about My Client to the general public, neighbours, and potential customers of My Client which is causing social and economic harm to My Client.
6. That your act of stalking, revealing personal information of My Client and spreading fabricated story about My Client's affair with

(2)

Residence: C-78, Neeti Bagh, August Kranti Marg, New Delhi-110049

A handwritten signature, possibly of the advocate, with the initials 'T.C.' written below it.


someone along with your act of disparaging the reputation of My Client to the general public, neighbours, customers and potential customers of My Client is severely defaming and damaging her reputation and goodwill amongst the public at large. That the abovementioned acts of you, the addressee constitute various criminal offences which makes you, the abovementioned addressee criminally liable.

7. That it is further important to bring to your knowledge that the act of stalking and tracking My Client in connivance with her husband Mr. Surinder Singh amounts to the offence of Stalking and Criminal Conspiracy and criminal Intimidation amongst various other offences which are non-bailable and cognizable punishable under the Indian Penal Code and allied laws. The said offences are punishable with imprisonment and with fine or with both.

8. That it has been established that you have flouted multiple legal norms and caused great mental agony and inconvenience to my Client, including the fact that you have violated her fundament

(3)

Residence: C-78, Neeti Bagh, August Kranti Marg, New Delhi-110049

  
T.C.

right, the right to life enshrined in Article 21 of the Constitution of India. Therefore, you are required to immediately restrain/take down all the above-mentioned spying activities and evidences provided to any third party with respect/related to My Client.

9. That in light of the torture and harassment inflicted by you, the addressee upon my client, she is entitled to be compensated to the tune of Rs. 90,00,000/- (Rupees Ninety lakhs only).
10. I, therefore, call upon you, the addressee through this Legal Notice/Communication to give your reply within 14 days. If you, the addressee fail to reply within 14 days of the receipt of this Notice, my client shall take the legal recourse as she deems fit. I have clear instructions from my client to take appropriate criminal legal action against you, the addressee on account of the aforementioned illegal activities committed by you, the addressee which is clearly outside the legal framework. The said act committed by you, the addressee is not only condemnable but also unjustifiable and reprehensible in the eyes of law.

(4)

Residence: C-78, Neeti Bagh, August Kranti Marg, New Delhi-110049

1  
T.C.



Note: A Copy of the present Legal Notice is retained in my office for further necessary action.

*Preeti Singh*

**PREETI SINGH**  
(ADVOCATE)  
(D-1094/2003)

(5)

---

Residence: C-78, Neeti Bagh, August Kranti Marg, New Delhi-110049

*T.C.*

ANNEXURE P/3 (copy)

Divorce Cases Investigation Ser x  
https://www.amxdetectives.com/divorce-cases-investigations.php

AMX Detectives(P) Ltd.  
WE UNVEIL THE WORLD OF MYSTERY

ABOUT PERSONAL DETECTIVES CORPORATE DETECTIVES COUNSELING

BRANCHES BLOG CONTACT

QUICK ENQUIRY

Our versatile team of private detectives is expert in handling and solving cases like child custody, divorce cases, extra marital affairs, financial & parental property cases etc.

We aim to achieve highest degree of customer satisfaction by providing our reliable divorce cases investigation in Delhi, Mumbai, Hyderabad, Bangalore, Chennai, Punjab, Kolkatta, Pune, Agra, Ahmedabad, Allahabad, Ambala, Amritsar, Bhopal, Chandigarh, Coimbatore, Dehradun, Faridabad, Ghaziabad, Goa, Gwalior, Indore, Jabalpur, Jaipur, Jalandhar, Kanpur, Kota, kurukshetra, Lucknow, Ludhiana, Meerut, Mussoorie, Nagpur, Nainital, Noida, Raipur, Rajkot, Ranchi, Rohtak, Shimla, Surat, Udaipur, Vadodara and many other cities.

AMX Detectives is a reputed detective agency that conducts the investigation confidentially and provides the results on the basis of strong evidences like photographs and videos. We keep utmost level of transparency with our clients and do not reveal their identity with anyone at any cost.

Our timeless private investigation services are offered at affordable prices. All the methods and techniques we choose for private investigations are devised keeping in mind clients' requirements and sensitivity of the case.

Activate Windows

51



ABOUT PERSONAL DETECTIVES CORPORATE DETECTIVES COUNSELING

BRANCHES BLOG CONTACT

QUICK

ENQUIRY

## PERSONAL DETECTIVES

# STILL PHOTO AND VIDEOGRAPHY

AMX Detectives (P) Ltd. is a main detective and investigation who uses present day technology, undercover agent devices like: - secret agent cameras, secret agent Bluetooth and so forth. On behalf of this latest technology, we acquire the proofs and evidence in opposition to the challenge and offer the clean photograph, and shoot pictures and videographer.

AMX Detectives (P) Ltd. organization believes to make fully glad to its clients by means of supplying robust and precious proofs, evidence which can be additionally expectable via judicial of India, those proofs and evidence can be inside the form of audios/motion pictures/photographs. AMX Detectives (P) Ltd. Continues complete secrecy and ensure that their confidentiality will no longer be divulging everywhere. We have experienced educated and smart detectives and investigators who work for our detective agency.

### LITIGATION SUPPORT

STILL PHOTO & VIDEOGRAPHY

UNDERCOVER OPERATIONS

SURVEILLANCE DETECTIVES

DEBUGGING SERVICES

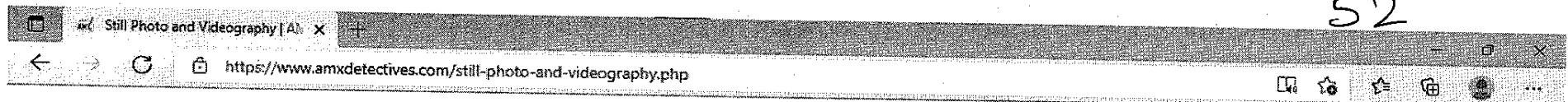
COUNTER SURVEILLANCE SERVICES

TSCM SERVICES



Activate Windows

52



ABOUT PERSONAL DETECTIVES CORPORATE DETECTIVES COUNSELING

BRANCHES BLOG CONTACT

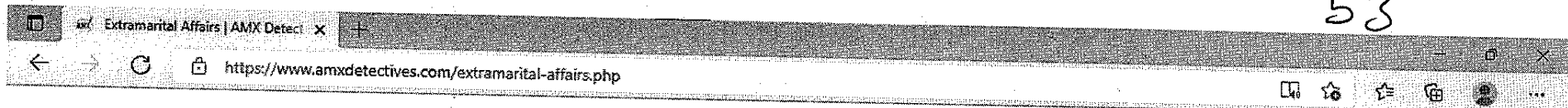
QUICK

ENQUIRY

proof against the concern and offer the clear image, and shoot pix and videographer. We absolutely satisfy our clients via supplying strong and precious proofs, proof that are additionally expectable via judicial of India. These proof are in the shape of audios, films and photos. We hold complete secrecy.

We additionally always here with our professional behavior with exclusive inquiries in utmost discreet way to find out which have hidden truth. Our approach of accomplishing enquiries is so meticulous that even our direct technique to the subject creates least doubt and that is viable due to the quilt memories we take. We're always brief to give you an alibi. We additionally do **videography and still photography** and offer video and photographic evidence wherever viable. We've got in a manner emerge as hooked on the thrill of the hunt and the joy and birthday celebration of the reunion. Whilst we acquire a name to discover a lacking friend, excessive school friend, girlfriend, boyfriend, military accomplice, acquaintance or lost love.





[ABOUT](#) [PERSONAL DETECTIVES](#) [CORPORATE DETECTIVES](#) [COUNSELING](#)

[BRANCHES](#) [BLOG](#) [CONTACT](#)

QUICK

ENQUIRY

## SATISFACTION AT AFFORDABLE CHARGES

AMX Detectives is one of the best detective agency in India offer special Investigation services for those peoples when they are in doubts and feel that his/her Boy Friend, Girlfriend, Partner or spouse having an extramarital affair relationship with any other person. We have a special dedicated team for these kind of cases in which Surveillance being tailing or shadowing of a person and then observing his movements and activities, it provides best information about the target. Surveillance may be static or mobile.

We tail a person with utmost care using latest technologies and also provide video and photographic evidence wherever possible. We also make use of under cover vehicles equipped with all modern gadgets to get closer to the subject and find out the real truth and there by confirm our doubts. Our Surveillance is so unobtrusive that the target becomes least suspicious of being watched and as a result, it may continue for days together and the subject hardly gets alert. Besides, while shadowing a person or conducting enquiries about a person, we do take care of legal implications involved.

UNDERCOVER OPERATIONS

SURVEILLANCE DETECTIVES

DEBUGGING SERVICES

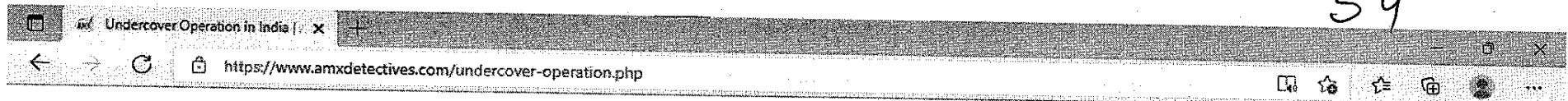
COUNTER SURVEILLANCE SERVICES

TSCM SERVICES

Activate Windows  
Go to Settings to activate Windows



54



ABOUT PERSONAL DETECTIVES CORPORATE DETECTIVES COUNSELING

BRANCHES BLOG CONTACT

QUICK

ENQUIRY

The undercover services are required by either for personal sector or for corporate sector. AMX is being needed by the personal sector say individuals to check on friend, family, beloved, spouse and kids and corporate sectors are needing us for checking up their employees, competitors, running trade union etc and they are also needing us to stop theft, pilferages and reasons to get less productions.

For Personal sector, we are placing undercover agents as a driver, maid, servant and more and for corporate sectors, they are working as their employees and get the required information's or details for them.

Alternatively, we can monitor their movements within your organization, place investigators under-cover to work along side them and subsequently, if required, befriend them and maintain surveillance upon them outside of your organization, to establish whom their employers are.

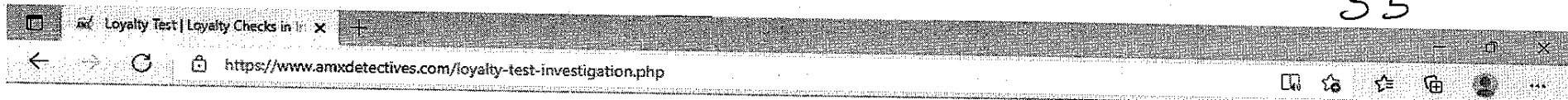
DEBUGGING SERVICES

COUNTER SURVEILLANCE SERVICES

TSCM SERVICES



55



ABOUT PERSONAL DETECTIVES CORPORATE DETECTIVES COUNSELING

BRANCHES BLOG CONTACT

QUICK

ENQUIRY

## GUARANTEED SATISFACTION AT AFFORDABLE CHARGES

AMX Detectives (P) Ltd. is one of the best loyalty test agency in India offer loyalty test investigation services in all over India and abroad. We offer special services for those peoples when they are in doubts and feel that his/her Boy Friend, Girlfriend, Partner or spouse having an affair/extra marital affair relationship with any other person. When you feel that your partner or spouse is having an extra marital relationship with any one, it is imperative that you verify the facts and obtain as much evidence as possible. In the long term this will provide you with peace of mind and will clear your doubts Also, if you were to falsely accuse your partner, it may result in an irretrievable breakdown in your relationship.

UNDERCOVER OPERATIONS

SURVEILLANCE DETECTIVES

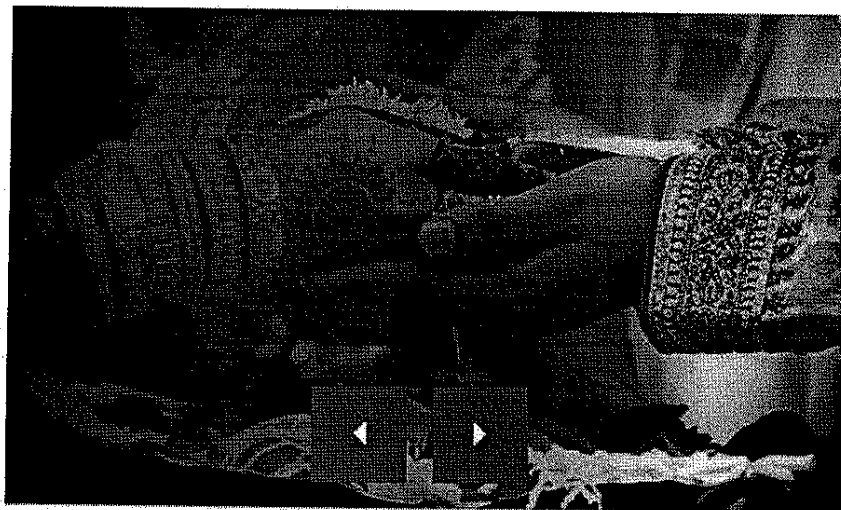
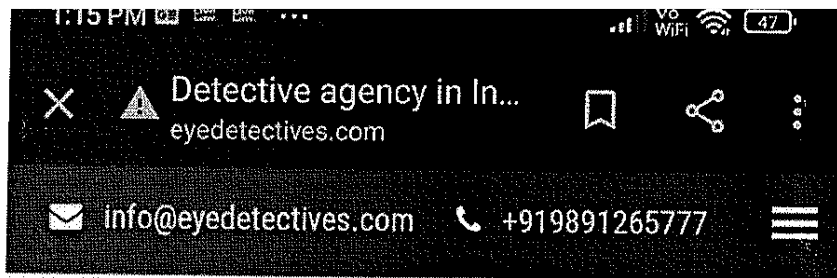
DEBUGGING SERVICES

COUNTER SURVEILLANCE SERVICES

TSCM SERVICES



56

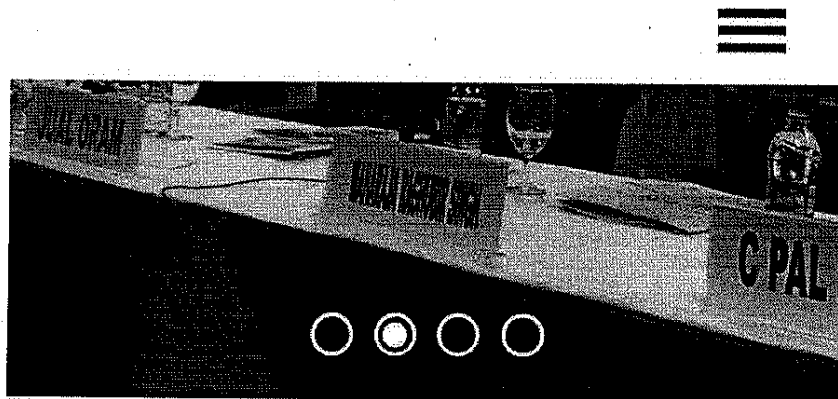


WELCOME TO EYE  
DETECTIVES



57

**CITY INTELLIGENCE PVT. LTD.**  
**THE CLUE HUNTER**



## **BEST DETECTIVE AGENCY**

**Registered With Govt Of India &  
International Awarded Detective Agency**

Verification, Insurance Claim Investigations etc.)

## **City Intelligence is Known for its:**

- Affordable Private Investigation Services
- 24 Hours & 7 Days Week Availability
- Both Male & Female Operatives
- Completely Confidential & Discrete
- Latest Modern Surveillance Technology
- Helping People in Finding Truth from last 22 Years
- Very High Success Closure Rate with Detailed Reports

**City Intelligence is here to help you & serve you, No need to feel shy about sharing your budget with us. Else there is a chance of higher investigation bills beyond your expectations.**

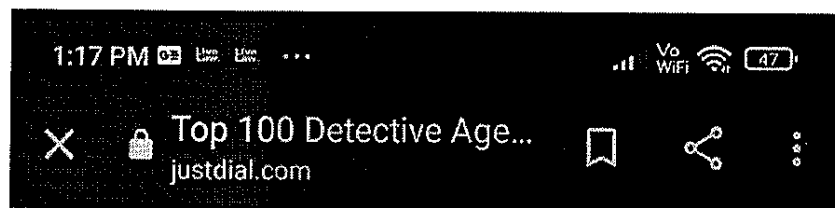


## **Pre & Post Matrimonial Detective Service Provider in Delhi**

When you are going to start a new relationship and planning to get married, then you should enquire about your partner. Trust us this is the need of the hour, as thousands of divorce and similar cases are filed every month. There are so many cheaters present in the world and you never know that you can be victimized by these fools. Therefore there is a need to take precautions before marriage, and you must contact top detective agency in Delhi for Pre-matrimonial investigation. Through this, you can get to know everything about your future partner. It will make your decision easier and you will gain confidence of getting married to that person.



60



< Justdial > 🔔

🔍 Detective Agencies Sant Nagar East ... 🗣️

Sort By

Filters

Map



**Venus Detective (Female Detective)**

4.1 ★★★★★ 217 Ratings

A Block Noida Sector 5

Verified Jd Pay

📞 Call Now

Get Best Deal



**Bharat Detectives Pvt Ltd.**

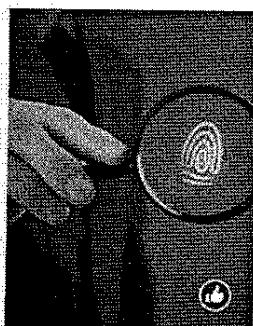
5.0 ★★★★★ 50 Ratings

Near Vinayak Noida Sector 27

Verified Trust Jd Pay

📞 Call Now

Get Best Deal



**Secret Service Bureau**

4.6 ★★★★★ 10 Ratings

Rajeev Gupta Rajouri Garden

Verified Jd Pay

📞 Call Now

Get Best Deal

61



### Secret Service Bureau

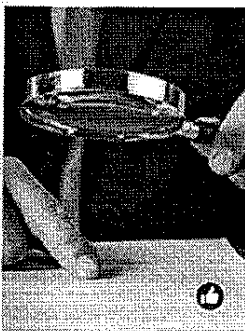
4.6 ★★★★★ 10 Ratings

Rajeev Gupta Rajouri Garden

Verified Jd Pay

Call Now

Get Best Deal



### Indian Lady Detective

4.6 ★★★★★ 45 Ratings

Laxmi Nagar

Verified Trust Jd Pay

Call Now

Get Best Deal



### Ss Fast Detective Agencies

4.6 ★★★★★ 32 Ratings

Janakpuri District Centre

Verified Jd Pay

Call Now

Get Best Deal



### Eagle Watch Intelligence Bureau

4.8 ★★★★★ 3 Ratings

Janakpuri

Jd Pay

Call Now

Get Best Deal



1:17 PM

Vo WiFi 47

62

**Don't Hesitate; Consult our  
Professional Investigators in  
Delhi now, over the Phone or via  
Email.**

+91-9811510888

cityintelligence@gmail.com.

## Featured on

hindustantimes



THE TIMES OF INDIA



दैनिक जागरण

mid-day

dailyhunt

TheNational





### Secret INDIA

4.9 ★★★★★ 5 Ratings

Vikas Marg Laxmi Nagar

Jd Pay



Call Now

Get Best Deal



### Sharpshooter Detective Service

4.7 ★★★★★ 34 Ratings

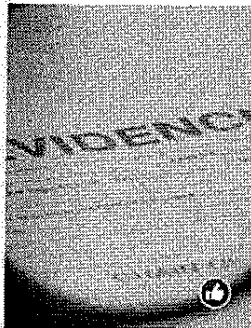
Malviya Nagar

Jd Pay



Call Now

Get Best Deal



### True Eye Investigation Dwarka

4.1 ★★★★★ 14 Ratings

Nawada Dwarka

Jd Pay



Call Now

Get Best Deal



### Wellwisher Detective Agency

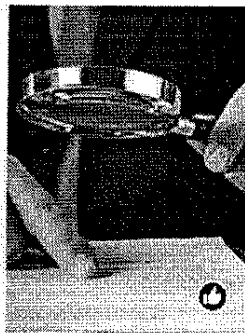
4.9 ★★★★★ 215 Ratings

Najafgarh Road Dwarka

Jd Pay

64

1:17 PM



### All India Detective Pvt Ltd

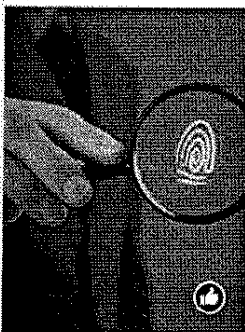
3.9 ★★★★★ 5 Ratings

Rajouri Garden

JD Pay

Call Now

Get Best Deal



### Baba Detective Agencies

4.9 ★★★★★ 9 Ratings

Naveen Shahdara Shahdara

JD Pay

Call Now

Get Best Deal



### Chetak Matrimonial Investigation Services

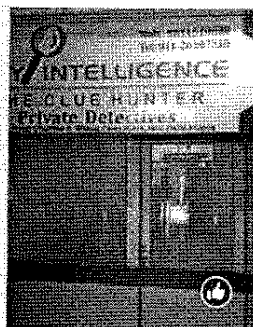
4.6 ★★★★★ 11 Ratings

Sector 10a Gurgaon Sector 10A

JD Pay

Call Now

Get Best Deal



### City Intelligence Pvt Ltd

4.7 ★★★★★ 31 Ratings

Bhikaji Cama Place

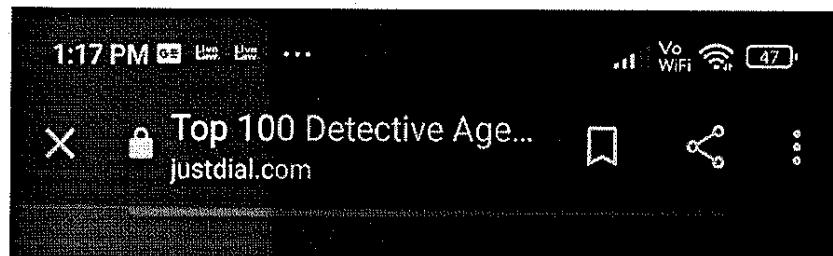
Verified JD Pay

Call Now

Get Best Deal



65



### City Investigators

4.7 ★★★★★ 82 Ratings

Pharmacy South Extension 1

Jd Pay

Call Now

Get Best Deal



### Action Detective Services Pvt Ltd

4.7 ★★★★★ 89 Ratings

Rohini Sector 8

Verified Jd Pay

Call Now

Get Best Deal



### ALLIANCE DETECTIVE SERVICE PVT LTD

We Give You The Comes In Your Lega

Call. 783800

### Alliance Detective Services Pvt Ltd

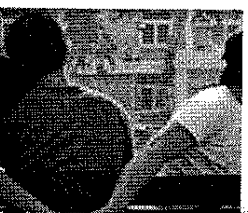
4.4 ★★★★★ 247 Ratings

Dilshad Garden

Verified Jd Pay

Call Now

Get Best Deal



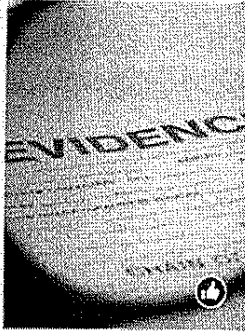
### Scorpion Verification & Consultancy Pvt Ltd

4.2 ★★★★★ 98 Ratings

Colony Kalyan Marg Preet Vihar

1:18 PM

Vo WiFi 47



### Sterling Detective

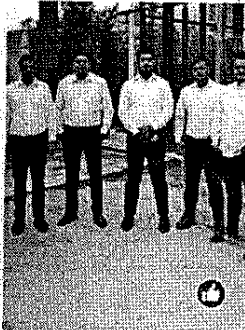
4.4 ★★★★★ 7 Ratings

Rajouri Garden

Jd Pay

Call Now

Get Best Deal



### J & J Securitybeez

4.9 ★★★★★ 11 Ratings

F- Block Dwarka Sector 19

Jd Pay

Call Now

Get Best Deal



### All Solution All Over INDIA Detective Agency

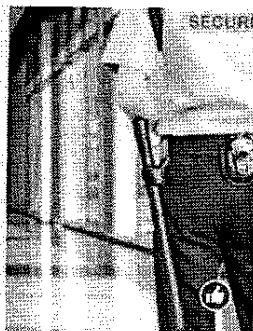
4.3 ★★★★★ 22 Ratings

D-07 Shalimar Garden

Jd Pay

Call Now

Get Best Deal



### Viraz Intelligence Security

5.0 ★★★★★ 6 Ratings

122/6/1 Gf Sant Nagar

Jd Pay

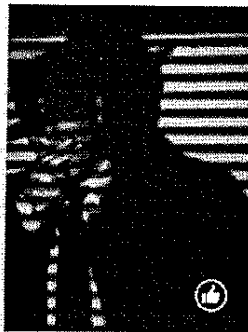
Call Now

Get Best Deal

66

67

1:18 PM 5G LTE+ 47%  
VoWiFi  
X Top 100 Detective Age... justdial.com



### Secret Eye Detective Service

4.3 ★★★★★ 26 Ratings

Plot No. - A 19/S Pandav Nagar

Jd Pay

Call Now

Get Best Deal



### Dci Detectives

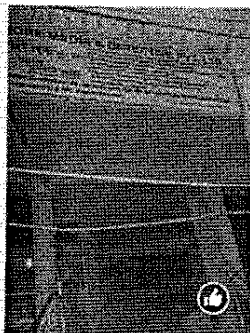
5.0 ★★★★★ 3 Ratings

Kesavpuram

Jd Pay

Call Now

Get Best Deal



### Rathore Detective Pvt Ltd

3.8 ★★★★★ 23 Ratings

Street Number 6 Mahipalpur

Jd Pay

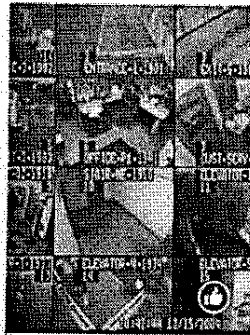
Call Now

Get Best Deal

68

1:17 PM

Call Now



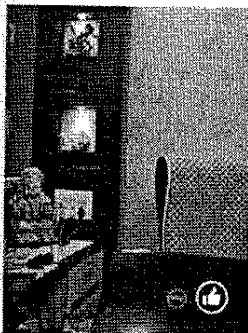
### Ncf INDIA Detective Network

4.9 ★★★★★ 59 Ratings

812-Ajaina Tower-II Janakpuri

Jd Pay

Call Now



### Tejas Detective Agency Pvt Ltd

4.4 ★★★★★ 28 Ratings

44-Lok Vihar-Pitampura Pitampura

Verified Jd Pay

Call Now



### C3i Detective Services

3.8 ★★★★★ 54 Ratings

Vasant Kunj

Verified Jd Pay

Call Now



### Hawk Eye Forensic Lab

4.7 ★★★★★ 113 Ratings

Sector- 65

Verified Trust Jd Pay

Call Now



1:18 PM

63

Live

Live

...

Vo

WiFi

47

69



### Omkareshwar Detective Agency

3.3 ★★★★★ 6 Ratings

Lucknow, Gomti Nagar

Jd Pay

Call Now

Get Best Deal



### Amitesh Private Detective

5.0 ★★★★★ 366 Ratings

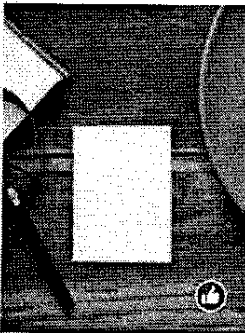
Lucknow, Hussainganj

Verified Jd Pay

Get your hands on this offer

Call Now

Get Best Deal



### Detective Group

4.0 ★★★★★ 67 Ratings

Indore, Old Palasia

Jd Pay

Call Now

Get Best Deal



### Nipi Detective Network INDIA

4.5 ★★★★★ 29 Ratings

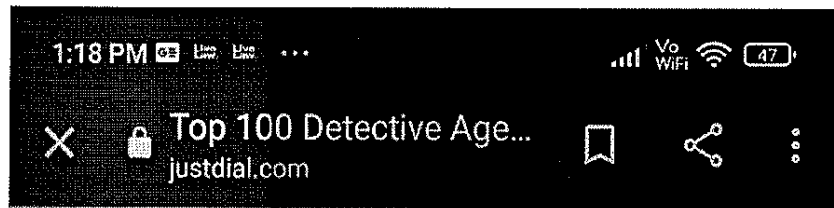
Vadodara, Fateganj

Jd Pay

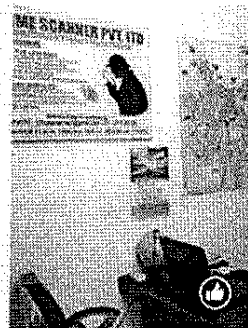
Call Now

Get Best Deal





70



### Crime Scanner

4.6 ★★★★★ 18 Ratings

Dwarka Sector 12

Verified

Call Now

Get Best Deal



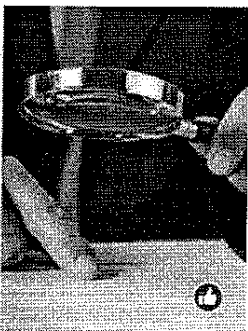
### Hidden Eye Detectives

5.0 ★★★★★ 1 Rating

N-5 Sector 39 Noida

Call Now

Get Best Deal



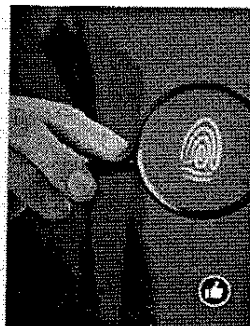
### LiveDetective.com

4.7 ★★★★★ 15 Ratings

Jaipur, Vidhyadhar Nagar

Call Now

Get Best Deal



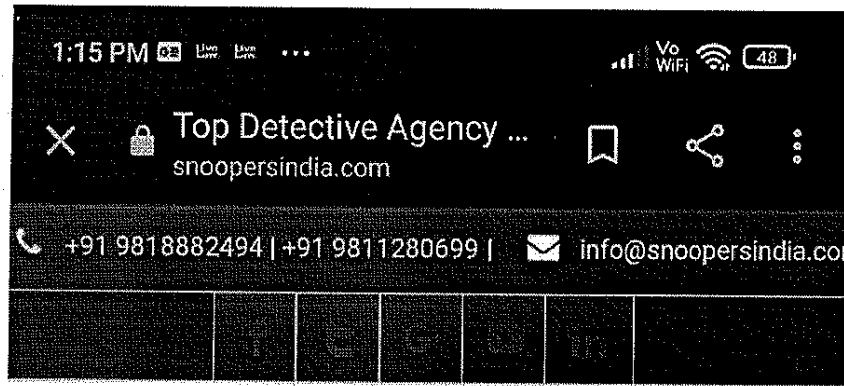
### All INDIA Detectives Pvt Ltd

3.7 ★★★★★ 23 Ratings

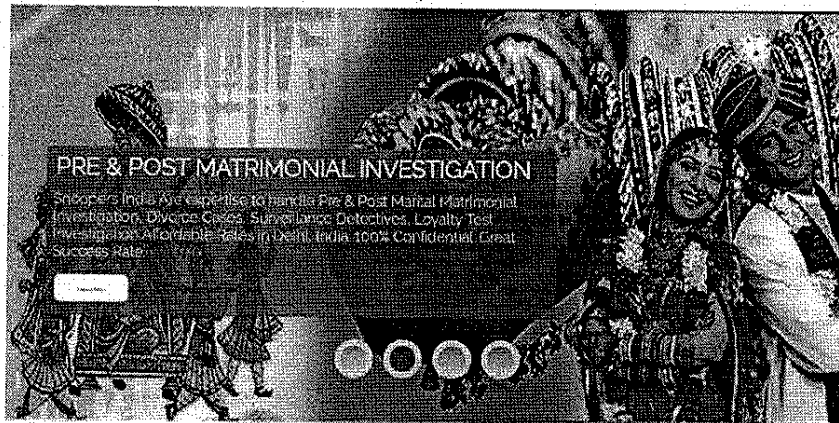
Bareilly, Bareilly Ho

Call Now

Get Best Deal



71



## Welcome to India's Leading Pre & Post Matrimonial Private Detective agency in Delhi, India

Snoopers India is a leading private detective agency in Delhi – India. We are the most preferred detective agency in Delhi that delivers the best detective services across India. We are skilled to deliver fantastic results through a world-class and well-qualified team of investigation officers who deal with multiple detective services

72

**IN THE HIGH COURT OF DELHI AT NEW DELHI**  
**C.M. NO. \_\_\_\_/2021**  
**IN**  
**CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

RADHA BISHT ...PETITIONER  
VERSUS  
STATE OF NCT OF DELHI & ORS. ...RESPONDENTS

**APPLICATION U/S. 151 OF CPC, 1908 SEEKING  
EX-PARTE, AD-INTERIM RELIEF**

TO  
THE HON'BLE CHIEF JUSTICE AND HIS  
COMPANION JUSTICES OF THE HIGH COURT  
OF DELHI.

THE HUMBLE PETITION OF THE  
PETITIONER ABOVE NAMED.

**MOST RESEPECTFULLY SHOWETH**

1. That the instant application is filed on behalf of the Petitioner along with the main writ petition. The contents of the main petition is not repeated herein for the sake of brevity and the same may

be read as part and parcel of this instant application.

2. That the Petitioner is facing great harrasment due to the illegal activities of the Respondent no. 3.
3. That the Petitioners are under a threat which exists and is on going and the risk increases if they after notice being issued in case this Hon'ble Court deems fit and issues notice in the matter.

**PRAYER**

In view of the above facts and circumstances of the case, it is, therefore prayed that the Hon'ble Court may graciously be pleased to pass the following order:

- (A) Pass a direction to the respondent no.2 to ensure that respondent no. 3 and 4 refrain from harassing, defaming and violating the privacy of the petitioner.
- (B) Pass a direction to the respondent no. 2 to take strict action against the respondent no. 4 and

74

instruct the police officials to act upon the police complaint filed by the petitioner against the respondent no.4.

- (C) Pass any other order/direction this Hon'ble Court deems fit and proper in the interest of Justice in favor of the Petitioner.

**AND FOR THIS ACT OF KINDNESS, THE  
PETITIONER AS IN DUTY BOUND SHALL EVER  
BE GRATEFUL**

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**

1  
Ema  
(O) : 0

Place: New Delhi  
Date: 08/12/2021

75

IN THE HIGH COURT OF DELHI AT NEW DELHI  
C.M. No. \_\_\_\_/2021

IN  
CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)

**IN THE MATTER OF:**

RADHA BISHT

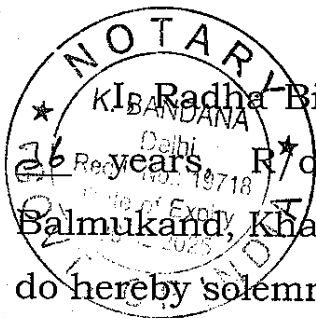
...PETITIONER

VERSUS

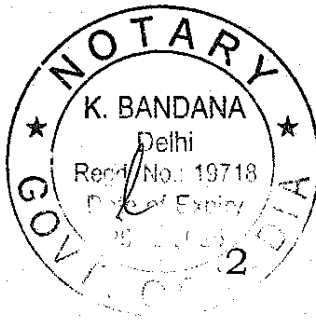
UNION OF INDIA & ORS.

...RESPONDENTS

**AFFIDAVIT**



I, Radha Bisht, w/o Surinder Singh, aged about 26 years, R/o. House No. 113, Ground Floor, Balmukand, Khand Giri Nagar, Kalkaji, Delhi-110019., do hereby solemnly affirms and declare as under:-



1. That I am Petitioner in the above said matter and am conversant with the facts and circumstances of the case, as such competent to swear this affidavit.

2. That I have read the accompanying application U/s 151 of CPC, 1908 seeking ex-parte, ad-interim relief based on the knowledge derived from official record, based on legal advice, and understood the contents thereof. The facts stated



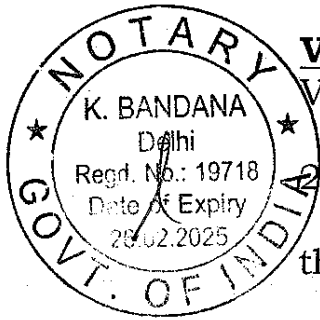
76

there are true and correct to the record of the case which I believe to be true.

3. That the Annexures filed herewith are true copies of their respective originals.

*Prerna Mittal*

DEPONENT



**VERIFICATION:**

08 DEC 2021

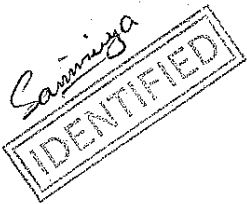
Verified at New Delhi on this \_\_\_\_\_ day of November,

2021. I, the above named deponent, do hereby verify

that the contents of the above affidavit are true and

correct. No part of it is false and nothing material has

been concealed therefrom.



*Prerna Mittal*

DEPONENT

CERTIFIED THAT THE DEPONENT

Sh./Smt./Km. *Radha Gishk*

S/o W/o *Suninder Singh*

R/o \_\_\_\_\_

Identified by Shri/Smt. *Prerna Singh Adv.*

has solemnly affirmed before me at Delhi

on \_\_\_\_\_ S. No. \_\_\_\_\_

that the contents of the affidavit which have

been read Over & explained to him & he

& correct to his Knowledge.

NOTARY

08 DEC 2021

77

IN THE HIGH COURT OF DELHI AT NEW DELHI  
C.M. No. \_\_\_\_/2021

IN  
CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021  
(PUBLIC INTEREST LITIGATION)

**IN THE MATTER OF:**

RADHA BISHT

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

**AN APPLICATION U/S 151 CPC FOR  
EXEMPTION FROM FILING OFFICIAL  
TRANSLATION OF ANNEXURE.**

To

The Hon'ble the Chief Justice of the High Court of  
Delhi and his Companion Judges of the said High  
Court.

This humble petition of the Plaintiff  
abovenamed:

**MOST RESPECTFULLY SHEWETH:**

1. The present (PIL) Public Interest Litigation is preferred by the Petitioner seeking this Hon'ble Court to take cognizance of the fact that due to

the Private Detective Agencies (Regulation) Bill of 2007 being pending in the parliament for the last 13 years, it has fell through and expired, therefore there is no law governing the activities of private detectives and their agencies. Due to such absence of any law governing the activities of private detectives, people being victim of abuse, people violated of their right to privacy, people being cheated or offended otherwise, have no statutory law to invoke against the agencies and make them liable. Such inability to make private detective agencies liable before any court of law or authority enable them to operate in any manner which they feel to be suitable for themselves.

2. That the petitioner has stated all the detailed facts and circumstances in the accompanying Petition and for the sake of brevity he is not repeating the same and prays that said contents

may kindly be read as part and parcel of the present application.

3. That in support of his case before this Hon'ble Court, the petitioner has annexed some documents, Annexure P-1, which are originally in Hindi.
4. That due to paucity of time, petitioner could not file the official translation of the said documents and is filing the copies of the said annexures after getting them translated through private sources. However, the said annexures are true translated copies of their respective originals and also necessary for perusal of this Hon'ble Court during the course of hearing of the accompanying Petition.
5. That the petitioner craves for the permission of this Hon'ble Court to get the matter listed for hearing before this Hon'ble Court and be heard.

80

on the basis of the said true translated copy in the absence of official translation of the said annexures.

**PRAYER**

In the circumstances herein above, it is therefore, most respectfully and humbly prayed that this Hon'ble Court may graciously be pleased to:

- (a) EXEMPT the Petitioner from filing the official translation of Annexures No. P- 1; and
- (b) PASS such other and further order(s) as this Hon'ble Court may deem fit and proper.

**THROUGH**

**FILED BY**

*Preeti Singh*

**PREETI SINGH, SUNKLAN PORWAL &  
SHUBHAM KAUSHIK**  
Counsels for the Petitioners

E  
(O

Place: New Delhi  
Date: 08/12/2021

81

**IN THE HIGH COURT OF DELHI AT NEW DELHI**  
**C.M. No. \_\_\_\_/2021**  
**IN**  
**CIVIL WRIT PETITION NO. \_\_\_\_ OF 2021**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**RADHA BISHT**

**...PETITIONER**

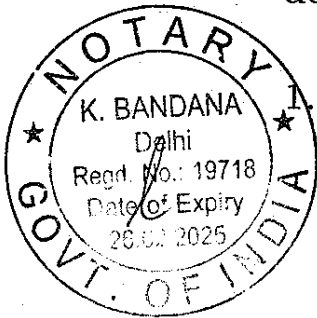
**VERSUS**

**UNION OF INDIA & ORS.**

**...RESPONDENTS**

**AFFIDAVIT**

I, Radha Bisht, w/o Surinder Singh, R/o. House No. 113, Ground Floor, Balmukand, Khand Giri Nagar, kalkaji, Delhi-110019., do hereby solemnly affirms and declare as under:-



That I am Petitioner in the above said matter and am conversant with the facts and circumstances of the case, as such competent to swear this affidavit.

- 2 That I have read the accompanying application U/s 151 of CPC, 1908 for exemption from filing official translation of anneuxure based on the knowledge derived from official record, based on legal advice, and understood the contents thereof.



82

The facts stated there are true and correct to the record of the case which I believe to be true.

3. That the Annexures filed herewith are true copies of their respective originals.

*Radha*  
*mint*

**DEPONENT**

**VERIFICATION:-**

Verified at New Delhi on this 08 DEC 2021 day of

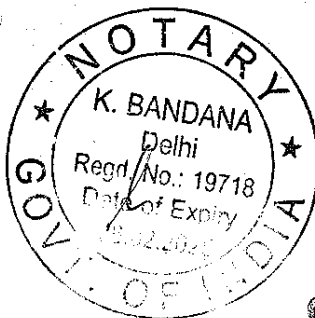
December, 2021 that the contents of affidavit are true and correct as per knowledge derived from records.

Nothing material has been concealed therefrom.

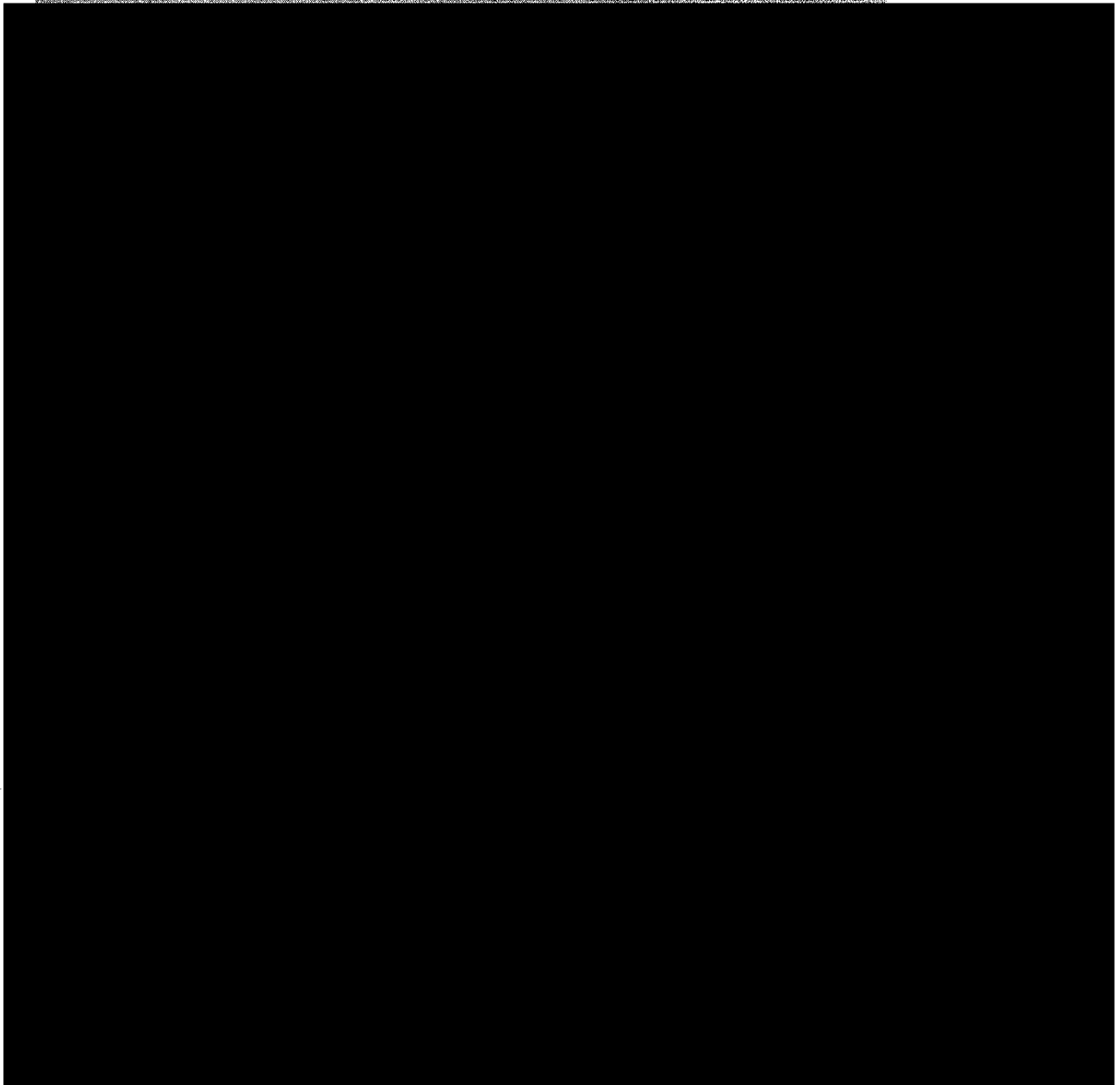
*Saini*  
**IDENTIFIED**

*Radha*  
*mint*

**DEPONENT**

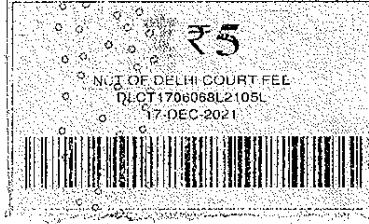
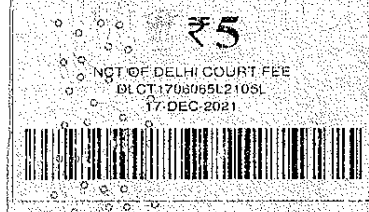
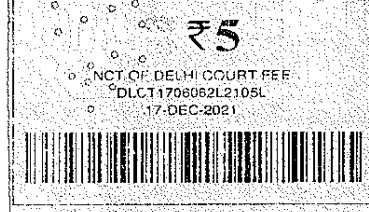
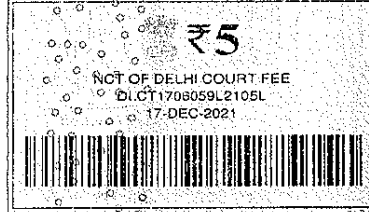
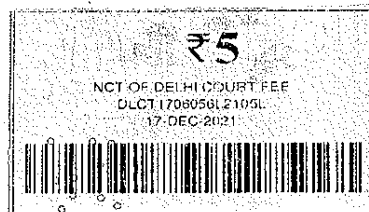
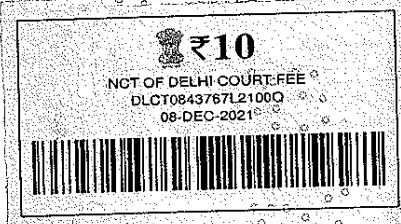
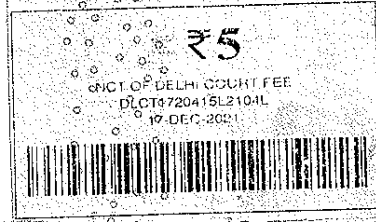
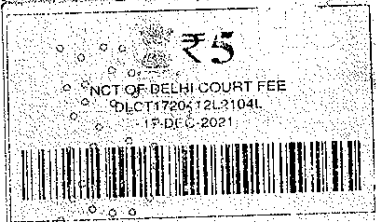
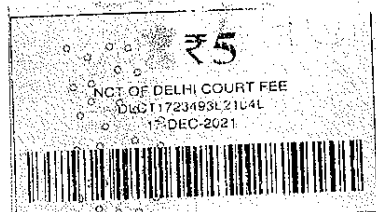


CERTIFIED THAT THE DEPONENT  
Shri/Smt./Mn Radha  
S/o W/o Saini  
R/o ...  
Identified by Shri/Smt. ...  
has solemnly affirmed before me at Delhi  
on 08 DEC 2021 St. No. 23B  
that the contents of the affidavit which have  
been read Over & explained to him and has  
& correct to his Knowledge.  
NOTARY



84

# COURT FEES



**VAKALATNAMA**

85

IN THE HIGH COURT OF DELHI AT NEW DELHI

CIVIL APPELLATE JURISDICTION

WRIT PETITION (C) PIL NO. \_\_\_\_\_ OF 2021

**IN THE MATTER OF:**

RADHA BISHT

VERSUS

...PETITIONER

UNION OF INDIA &amp; ORS

...RESPONDENTS

KNOW ALL I/We undersigned that the above named Appellant do hereby appointed:

**[PREETI SINGH]**

Advocate (D/1094/2003)  
 13, Babar Road, Bengali Market  
 New Delhi-110001  
 Mob: 9312411311  
[preetisingh1324@gmail.com](mailto:preetisingh1324@gmail.com)

**[SAUMYA DWIVEDI]**

Advocate (D/3372/2020)  
 13, Babar Road, Bengali Market  
 New Delhi-110001

(herein after called the advocate/s) to be my/ our advocate in the above-noted case and  
 To act appear and plead in the above noted case in this Court or in any other Court in  
 or heard and also in the Appellate Courts.

To sign, file verify and present pleadings, replications, appeals, cross-objections, or  
 review revision restoration withdrawal, compromise or other petitions replies, objection  
 documents as may be deemed necessary or proper for the prosecution of said case in all

To file and take back documents.

To withdraw, or compromise the said case or submit to arbitration any differences or  
 touching or in any manner relating to the said case.

To take out execution proceedings.

To deposit draw and receive moneys, cheques and grant receipts therefore and to do  
 which may be necessary to be done for the progress and in the course to the prosecution

To appoint instruct any other Legal Practitioner authorizing him to exercise the power  
 conferred upon the Advocate whenever he may think fit to do so and sign, the power  
 behalf.

And I/We the undersigned do hereby agree to rectify and confirm acts as done by the Advocate or their  
 substitutes in the matter as my/our own acts, as if done by me/us for all intent and purposes.

And I/We undertake that I/we or my/our duly authorised agent would appear in court on all hearings when  
 case is called.

And I/We the undersigned do hereby agree not to hold the Advocate or their substitute responsible to the  
 result of the said case consequence for his absence from the Court when the said case is, called up for hearing  
 or any negligence of the said Advocates or his substitute.

And I/We the undersigned do hereby agree that in the event of the whole or any part to the fee agreed by  
 me/us to the Advocate remaining unpaid they will be entitled/allowed for an adjournment.

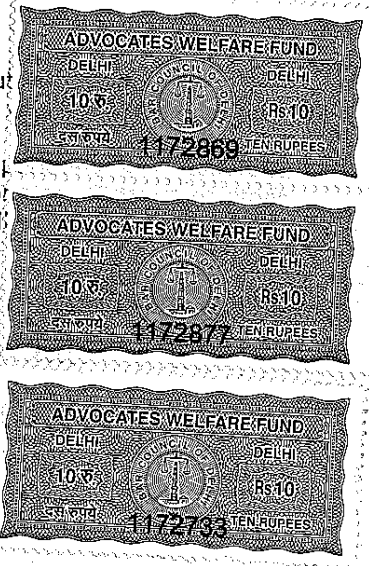
In witness whereof I/we do hereunto set my/our hand to these presents the contents of which have been  
 understood by me/us this 3<sup>RD</sup> day of December, 2021

Accepted, Identified & Certified

**[PREETI SINGH]**  
 ADVOCATE

**[SAUMYA DWIVEDI]**  
 ADVOCATE

*Radha Bisht*  
 CLIENT



86

1 message

To: uoidhc@gmail.com, standingcounselgnctd@gmail.com

Sat, Dec 18, 2021 at 1:46 PM

Dear Madam/Sir

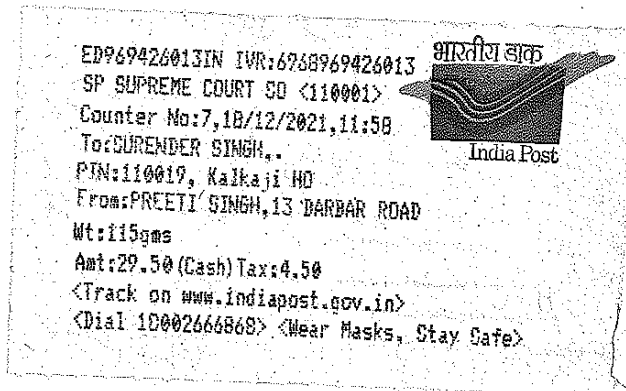
Please find enclosed herewith the Writ Petition on behalf of the Petitioner in the above said matter. kindly acknowledge the same.

Thanks & Regards

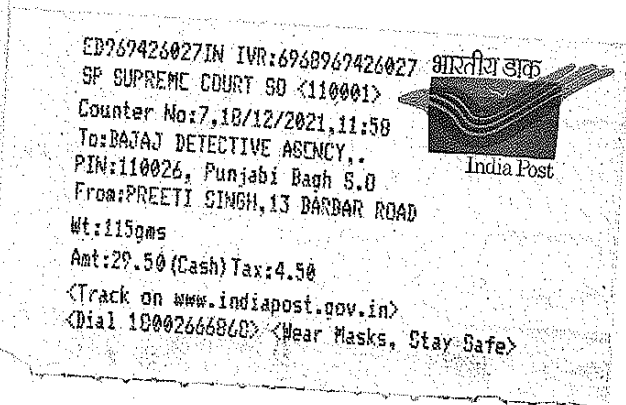
Preeti Singh  
Advocate for the Petitioner

 **RADHA BISHT (PIL).pdf**  
6850K

Service to respondent No. 1 & 2.

PROOF OF SERVICE

Respondent No. 3



Respondent No. 4