

**IN THE HON'BLE HIGH COURT OF DELHI AT NEW  
DELHI [EXTRAORDINARY CIVIL WRIT  
JURISDICTION]**

W.P. (C) No. \_\_\_\_\_ of 2022

**IN THE MATTER OF A PUBLIC INTEREST  
LITIGATION**

**IN THE MATTER OF:**

**ASHISH KUMAR**

**.... PETITIONER**

**VERSUS**

**UNION OF INDIA & ANR**

**....**

**RESPONDENTS**

**INDEX**

<b>S. No.</b>	<b>Particulars</b>	<b>Page Nos.</b>
	<b>Listing Performa</b>	
1.	Urgent Application	1-2
2.	Notice of Motion	3-4
3.	Court Fees	5
4.	Memo of Parties	6-7
5.	Synopsis and List of Dates	8-12
6.	Writ Petition along with the affidavit	13-28
7.	<b><u>ANNEXURE P-1 (COLLY)</u></b> Copy of the media reports on the security lapse of the Hon'ble Prime Minister	29-45

	<b><u>ANNEXURE P-2</u></b> Copy of the Special Protection Group Act, 1988	46-49
9.	<b><u>ANNEXURE P-3</u></b> Copy of the order passed by the Hon'ble Supreme Court in the case of "Commissioner of Police Delhi & Ors. Versus Registrar, Delhi High Court, New Delhi"	50-60
10.	<b><u>ANNEXURE P-4</u></b> Copy of the E-mail and the letter issued to the Respondent no. 1	61-63
11.	Proof of Service	64
12	Vakalatnama	65-66

Place: New Delhi

Date: 10.01.2022

PETITIONER

Through

**V. GOVINDA RAMANAN**

**Counsel for the Petitioner**

1

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URGENT APPLICATION

Sir/Madam,

Kindly treat the accompanying Writ Petition as an urgent one under the High Court orders and rules. The ground of urgency, are the same as stated in the present Writ Petition. That the Petitioner herein is constrained to file the present writ petition leaving the Petitioner herein with no other alternate remedy.

Therefore, it is prayed that the accompanying Writ Petition be treated as an urgent one and be listed for hearing urgently.

Place: New Delhi

PETITIONER

Date: 10.01.2022

Through

**V. GOVINDA RAMANAN**  
**Counsel for the Petitioner**

3

IN THE HON'BLE HIGH COURT OF DELHI AT NEW  
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IN THE MATTER OF:

ASHISH KUMAR

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RESPONDENTS

NOTICE OF MOTION

Sir/Madam,

Please find enclosed a copy of the Writ Petition along with annexures and applications filed on behalf of the Petitioner. The same is likely to be listed on or before .01.2022.

Please take notice accordingly.

Place: New Delhi

PETITIONER

Date: 10.01.2022

Through

V. GOWINDA RAMANAN

4

**Counsel for the Petitioner**

5

**IN THE HON'BLE HIGH COURT OF DELHI AT NEW  
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**IN THE MATTER OF:**

**ASHISH KUMAR**

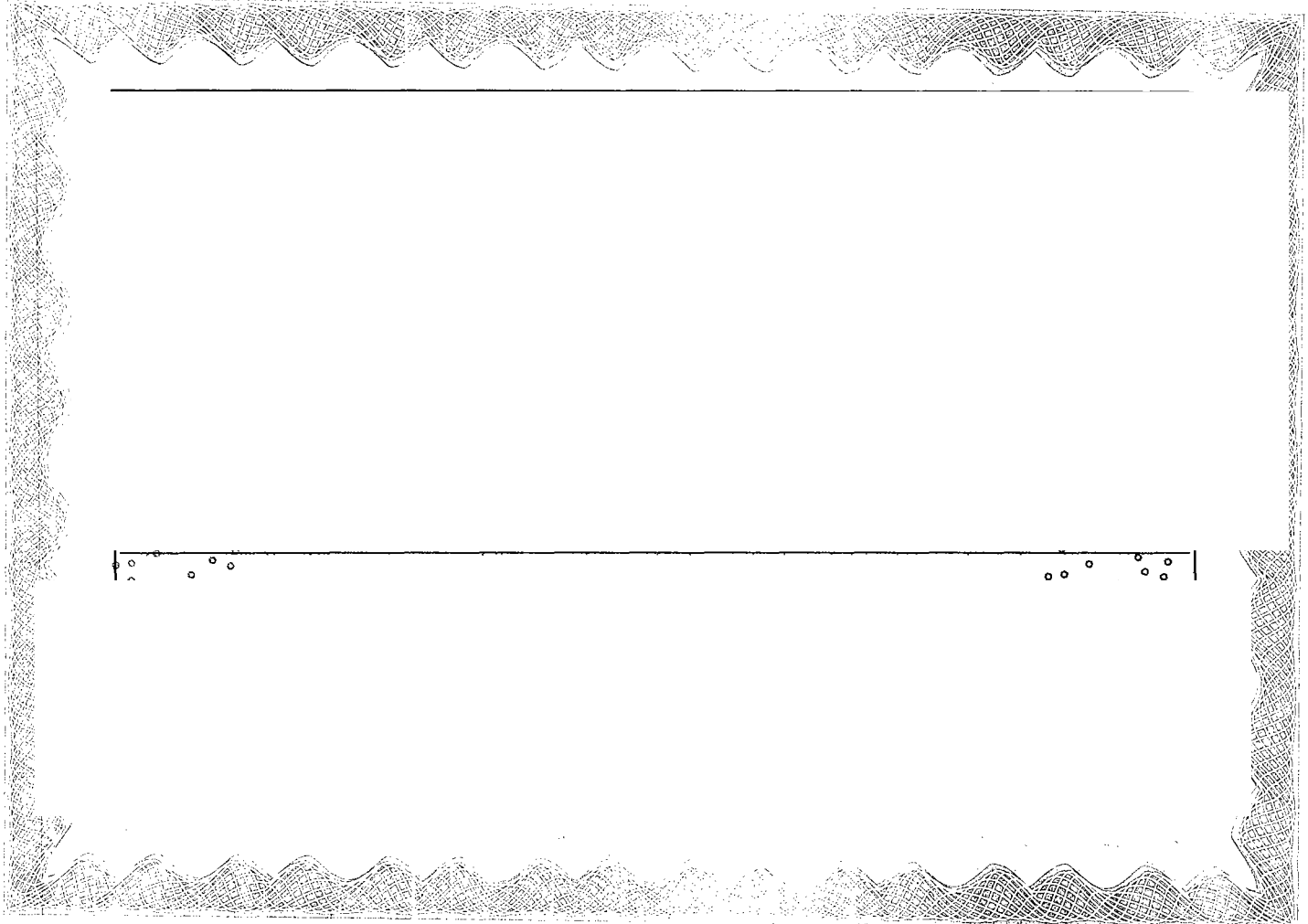
**.... PETITIONER**

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**....**

**RESPONDENTS**



6

IN THE HON'BLE HIGH COURT OF DELHI AT NEW  
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W.P. (C) No. \_\_\_\_\_ of 2022

IN THE MATTER OF A PUBLIC INTEREST

LITIGATION

MEMO OF PARTIES

ASHISH KUMAR

.... PETITIONER

VERSUS

UNION OF INDIA

*THROUGH ITS SECRETARY*

Ministry of Home Affairs,

North Block

New Delhi - 110001

.... RESPONDENT NO.

1

SPECIAL PROTECTION GROUP.

*THROUGH ITS DIRECTOR*

9. Lok Kalyan Marg.

New Delhi - 110001, India.



7

New Delhi – 110004

.... RESPONDENT NO. 2

Place: New Delhi

PETITIONER

Date: 10.01.2022

Through

**V. GOVINDA RAMANAN**

**Counsel for the Petitioner**

## SYNOPSIS AND LIST OF DATES

This Petition shall directly benefit and ensure safety of the citizens of India at large, including that of the Hon'ble Prime Minister and further seeks to protect the '*national security*' of this country, more so in view of the recent fatal lapse in the security of the Hon'ble Prime Minister, which, *inter-alia*, as per the reports in the media appears to have happened because of the lackadaisical approach of the Govt. of Punjab in ensuring his safety and security during his recent visit to the state.

Whereas, it came to the knowledge of the Petitioner via media reports that there has been a breach in the security of the Hon'ble Prime Minister during his recent visit to the border state of Punjab on 05.01.2022, which, *inter-alia*, is further evidence from the fact that his convoy was stuck and was made to wait on a flyover for more than 20 minutes, thereby, exposing and putting his life at risk to a terrorist attack.

Whereas, this country has already seen and experienced the consequences of such fatal lapses, more so, when two of our former Prime Ministers were assassinated, as a consequence of such security lapses, thereby, posing a great threat to the National Security of this country.

Whereas, as per media reports it has also come out in the public domain that the confidential route of the Hon'ble Prime Minister was also leaked, thereby, putting him and the life of the common citizens at risk, which, *inter-alia*, is also violative of Article 21 of the Constitution of India. It has also been seen that the Govt. of Punjab including the Police officials of the state

instead of coming to the aid of the Respondent No.2 i.e., Special Protection Group in terms of Section 14 of the SPG Act, 1988 were instead creating obstacles in the proximate security of the Hon'ble Prime Minister.

Whereas, the conduct of the Govt. of Punjab and the Police officials of the state was in clear violation to the dictum as laid down by the Hon'ble Supreme Court in the case of "*Commissioner of Police Delhi and Ors versus Registrar, Delhi High Court, New Delhi*" 1996 6 SCC 232, wherein, the Hon'ble Supreme Court has, *inter-alia*, been pleased to hold as under:

X X X X X X X X X X X

".... 15. We cannot help remarking that the will of the Parliament reflected in the Act is bold, unequivocal, comprehensive and wide in nature, nowhere permitting withdrawal, limiting or prescribing of the proximate security statutorily conferred on the protected. The mere fact that the protected has to go to court as an undertrial, does not disentitle him to the proximate security. His being in transit or getting within the precincts of the court does not absolve the Group from extending to him the proximate security as threat perception to him is in no way diminished. The expression "proximate security" has to be given a purposive meaning, for, it could never have been intended by the Parliament that security would be restricted to places of functions, engagements, residence or halt on resorting to a literal meaning. The purposive approach would warrant these places to be wide enough to include visits of a protected to courts, compulsive or voluntary and in no way can the Group be absolved from its statutory responsibility on the specious plea that having brought the protected to the court precincts, the obligation to protect him would then shift to the court, who may either, under orders, place the protected back to the Group, or send him into Police or judicial custody, shifting the obligation of his protection to others. A contrary view expressed on these lines by Shri Bhat deserves outright rejection. It has to be borne in mind that the protected is a protected all the time, as long as he keeps breathing for the period of ten years, from the date he demits office of the Prime

Minister. We shall not be taken to have even remotely suggested or tried to impinge on the power of the court to deal with the person summoned in accordance with law but we wish to lay emphasis that even in court custody or other custody as ordered by the court, the SPG protective cover cannot be lifted from the protected. It goes with the person of the protected as the shadow with a man. It is for the SPG to devise how to render meaningful protection to the protected wherever he is even when he is under court orders, vide Section 2(a).....

.... 21. In the same strain, we may, to some extent, deal with the scope of Section 14 of the Act, whereunder assistance can be requisitioned by the Group by enjoining, amongst others, every local or other authority or civil or military authority to act in aid of the Director or any member, whenever called upon to do so in furtherance of the duties and responsibilities assigned to such Director or member. The language employed is wide enough to include assistance to the Group from all civil and local authorities when taking a protected to a court of law. We see no reason why the court administration is isolated from such requirement as long as the assistance sought does not obstruct or in any other manner hinders court proceedings. We need not stretch this aspect of the matter any further for reasons which are obvious...."

That from the bare perusal of the above, *inter-alia*, it becomes evident that the scheme and the intent of the SPG Act, 1988 was to protect the protected at all times and as such all the authorities, whether state or central were duty bound to aid the director or any member of the group of the Respondent No.2 i.e. Special Protection Group. However, in the present case, the conduct/action of the authorities of the Govt. of Punjab has not only been lackadaisical in conforming to the provisions of the SPG Act, 1988 but the same has also been in contravention to the dictum as passed by the Hon'ble Supreme Court in the afore said case (*supra*).

Whereas, in view of the incident as happened in Punjab, *inter-alia*, it becomes evident that Section 14 of the SPG Act, 1988 in its present form lacks the teeth to ensure the absolute

proximate security/protection to the Hon'ble Prime Minister of India.

Therefore, via the present Petition under Article 226 of the Constitution of India, the Petitioner herein seeks the urgent intervention of this Hon'ble Court for the issuance of an appropriate writ, order or direction, thereby, declaring that in terms of Section 14 of the Special Protection Group Act, 1988 all the Authorities be it civil or military, state or central shall act as per the directions or under superintendence of the Director or any member of the Special Protection Group, whenever directed/called upon for ensuring the proximate security of the Hon'ble Prime Minister and his immediate family members, while discharging their duties/functions in terms of SPG Act, 1988

**LIST OF DATES& EVENTS**

<u>DATE</u>	<u>EVENT</u>
05.01.2022	<p>The Hon'ble Prime Minister of India was in the state of Punjab for a visit. It is pertinent to note that as per reports all the requisite co-ordination was done by the Respondent No.2 with the concerned officials of the Govt. of Punjab for ensuring the safety and security of the Prime Minister during his scheduled visit to the state.</p> <p>However, to the utter surprise and shock of the Petitioner herein, it came to his knowledge via media reports that the Prime Ministers convoy remained</p>

	<p>stuck on the flyover, thereby, jeopardising and putting his life and the life of the citizens at risk. It is further submitted that as per reports the Chief Secretary, State of Punjab and the Director General of Police gave assurances to Special Protection Group, that the route was clear, which were nothing but false assurances, thereby, resulting in a precarioussituation and as such the said action of the Govt. of Punjab and the Police officials are in direct contravention to provisions of Section 14 of the SPG Act, 1988.</p> <p>It is further submitted that as per reports, <i>inter-alia</i>, it became evident that the officials of the Govt. of Punjab were complacent, thereby, putting the security of the Prime Minister at risk, which, consequently also amounts to a threat to the National Security of our country.</p>
06.01.2022	<p>Immediately thereafter, a letter was issued/sent to the Respondent No. 1 i.e., Ministry of Home Affairs, <i>inter-alia</i>, requesting them to bring in appropriate amendments to the provisions of the SPG Act, 1988 in order to ensure that the security of the Hon'ble Prime Minister is ensured at all times, however, till date no response has been received.</p>
10.01.2022	Hence the Writ Petition

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RESPONDENTS

WRIT PETITION UNDER ARTICLE 226 OF THE  
CONSTITUTION OF INDIA ON BEHALF OF  
PETITIONER IN PUBLIC INTEREST FOR ISSUANCE  
OF A WRIT, ORDER OR DIRECTION , THEREBY,  
DECLARING THAT IN TERMS OF SECTION 14 OF THE  
SPECIAL PROTECTION GROUP ACT, 1988 ALL THE  
AUTHORITIES BE IT CIVIL OR MILITARY, STATE OR  
CENTRAL SHALL ACT AS PER THE DIRECTIONS OR  
UNDER SUPERINTENDENCE OF THE DIRECTOR OR  
ANY MEMBER OF THE SPECIAL PROTECTION  
GROUP, WHENEVER DIRECTED/CALLED UPON FOR  
ENSURING THE PROXIMATE SECURITY OF THE  
HON'BLE PRIME MINISTER AND HIS IMMEDIATE  
FAMILY MEMBERS, WHILE DISCHARGING THEIR  
DUTIES/FUNCTIONS IN TERMS OF SPG ACT, 1988

To,

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

**THE HUMBLE PETITION OF THE PETITIONER  
ABOVE NAMED**

**MOST RESPECTFULLY SHOWETH:**

1. That the Petitioner has no personal interest in the outcome of the petition. This petition is not guided by self-gain or for the gain of any other person or institution or body and there is no motive other than that of public interest in filing the present writ petition.
2. That the source of the Knowledge of the Petitioner in making the statement of facts in the present petition arises from his personal knowledge and information collected from media reports and websites and also further inquiries/investigation made to determine the veracity of the same.
3. That the entire citizenry of the country would benefit out of the present writ Petition. It is further submitted that the general public intricacies of the Special Protection Group Act, 1988 and as such the general public may be incapable of accessing the court on account of not being fully/properly equipped financially as well as legally and thus they are in no position to avail the remedies available



to them.

15

4. That the Respondent No.1 is the Ministry which is responsible for the internal security of our country, which includes ensuring the security and safety of its citizens, including that of the Hon'ble Prime Minister. That the Respondent No.1 is also exercises the power of general superintendence, direction and control over the Respondent No.2 i.e., SPG. That the Respondent No.2 is the group which is responsible for providing proximate security to the Hon'ble Prime Minister, his immediate family, former Prime Ministers and their immediate family members and as such is governed by the provisions of the Special Protection Group Act, 1988.
5. That the Petitioner is a law-abiding citizen of this country and a public-spirited person, who in order to protect the interest of the citizens and to further protect the national security of this country is filing the present Petition. It is further submitted that the Petitioner has the means to pay the costs, if any, imposed by the court and gives and undertaking to this Hon'ble court that he shall by any direction in this regard.
6. That on 06.01.2022, a letter and an e-mail was issued/sent to the Respondent No.1, *inter-alia*, requesting them to bring in appropriate amendments to the provisions of the SPG Act, 1988 in order to ensure that the security of the Hon'ble Prime Minister is ensured at all times, however, till date no response has been received from the Ministry.

7. That the Petitioner has not filed any other Public Interest Litigation before this Hon'ble Court or any other court on the present cause of action.

### FACTS

8. That on 05.01.2022, the Hon'ble Prime Minister of India was in the state of Punjab for a visit. It is further submitted that as per reports all the requisite co-ordination was done by the Respondent No.2 with the concerned officials of the Govt. of Punjab for ensuring the safety and security of the Prime Minister during his scheduled visit to the state. However, to the utter surprise and shock of the Petitioner herein, it came to his knowledge via media reports that the Prime Ministers convoy remained stuck on the flyover, thereby, jeopardizing and putting his life and the life of the citizens also at risk. It is further submitted that as per reports, the Chief Secretary, State of Punjab and the Director General of Police gave assurances to Special Protection Group, that the route was clear, which were nothing but false assurances, thereby, resulting in a precarioussituation and as such the said action of the Govt. of Punjab and the Police officials are in direct contravention to provisions of Section 14 of the SPG Act, 1988.
9. That as per reports, *inter-alia*, it became evident that the officials of the Govt. of Punjab were complacent, thereby,

putting the security of the Prime Minister at risk, which, consequently also amounts to a threat to the National Security of our country and threat to the national security is also likely to affect and threaten the lives of the common citizens of this country, which will be violative of Article 21 of the Constitution. A copy of the mediareports on these security lapse are attached herewith and marked as ANNEXURE P-1 (COLLY).

10. That during the last few decades, terrorism has been steadily assuming menacing proportions in various parts of the country and abroad. In addition to indulging in wanton killings, arson, looting and other heinous crimes with the object to overawing the Government, the terrorists aim to destabilize the democratically elected Government by resorting to selective killing of prominent members of the public including those who are in the Government and as such the Hon'ble Prime Ministers have been under several threats to their life. Therefore, with a view to provide proximate security to the Prime Minister, the Respondent No.2 i.e., Special Protection Group was created with the sole purpose of ensuring the safety and security of the Prime Minister and his family members. A copy of the Special Protection Group Act, 1988 is annexed herewith and marked as ANNEXURE P-2

11. That as per media reports, it has also come out in the public domain that the confidential route of the Hon'ble Prime Minister was also leaked, thereby, putting his as well as the life of the common citizens at risk, which, *inter-alia*, is also

violative of Article 21 of the Constitution of India. It is also pertinent to note that the Govt. of Punjab, including the Police officials of the state instead of coming to the aid of the Respondent No.2 i.e., Special Protection Group in terms of Section 14 of the SPG Act, 1988 were instead creating obstacles to the proximate security of the Hon'ble Prime Minister.

12. That the conduct of the Govt. of Punjab and the Police officials of the state was in clear violation to the dictum as laid down by the Hon'ble Supreme Court in the case of "*Commissioner of Police Delhi and Ors versus Registrar, Delhi High Court, New Delhi*" 1996 6 SCC 232, wherein, the Hon'ble Supreme Court has, *inter-alia*, been pleased to hold as under: -

XX X X X X X X X X X

".... 15. We cannot help remarking that the will of the Parliament reflected in the Act is bold, unequivocal, comprehensive and wide in nature, nowhere permitting withdrawal, limiting or prescribing of the proximate security statutorily conferred on the protected. The mere fact that the protected has to go to court as an undertrial, does not disentitle him to the proximate security. His being in transit or getting within the precincts of the court does not absolve the Group from extending to him the proximate security as threat perception to him is in no way diminished. The expression "proximate security" has to be given a purposive meaning, for, it could never have been intended by the Parliament that security would be restricted to places of functions, engagements, residence or halt on resorting to a literal meaning. The purposive approach would warrant these places to be wide enough to include visits of a protected to courts, compulsive or voluntary and in no way can the Group be absolved from its statutory responsibility on the specious plea that having brought the protected to the court precincts, the obligation to protect him would then shift to the court, who may either, under orders, place the protected back to the Group, or send him into Police or judicial custody, shifting the obligation of his protection

to others. A contrary view expressed on these lines by Shri Bhat deserves outright rejection. It has to be borne in mind that the protected is a protected all the time, as long as he keeps breathing for the period of ten years, from the date he demits office of the Prime Minister. We shall not be taken to have even remotely suggested or tried to impinge on the power of the court to deal with the person summoned in accordance with law but we wish to lay emphasis that even in court custody or other custody as ordered by the court, the SPG protective cover cannot be lifted from the protected. It goes with the person of the protected as the shadow with a man. It is for the SPG to devise how to render meaningful protection to the protected wherever he is even when he is under court orders. vide Section 2(a).....

.... 21. In the same strain, we may, to some extent, deal with the scope of Section 14 of the Act, whereunder assistance can be requisitioned by the Group by enjoining, amongst others, every local or other authority or civil or military authority to act in aid of the Director or any member, whenever called upon to do so in furtherance of the duties and responsibilities assigned to such Director or member. The language employed is wide enough to include assistance to the Group from all civil and local authorities when taking a protected to a court of law. We see no reason why the court administration is isolated from such requirement as long as the assistance sought does not obstruct or in any other manner hinders court proceedings. We need not stretch this aspect of the matter any further for reasons which are obvious...."

That from the bare perusal of the above, *inter-alia*, it becomes evident that the scheme and the intent of the SPG Act, 1988 was to protect the protected at all times and as such all the authorities, whether state or central were duty to bound to aid the director or any member of Respondent No.2. However, in the present case, the conduct/action of the authorities of the Govt. of Punjab has not only been lackadaisical in conforming to the provisions of the SPG Act, 1988 but the same has also been in contravention to the dictum as passed by the Hon'ble Supreme Court in the afore said case (*supra*). A copy of the order passed by the Hon'ble Supreme Court in the case of "**Commissioner of Police Delhi and Ors versus Registrar, Delhi High Court,**

*New Delhi*' is annexed herewith and marked as **ANNEXURE P-3**

13. That on 06.01.2022, a letter and an e-mail were issued to the Respondent No.1, *inter-alia*, requesting them to bring in appropriate amendments to the provisions of the SPG Act, 1988 in order to ensure that the security of the Hon'ble Prime Minister is ensured at all times, however, till date no response has been received, whereas, the threat to the life of the Prime Minister is continuing. A copy of the e-mail and the letter issued to the Respondent No.1 is annexed herewith and marked as **ANNEXURE P-4**.

14. That in view of the incident as happened in Punjab, *inter-alia*, it becomes evident that Section 14 of the SPG Act, 1988 in its present form lacks the teeth to ensure the absolute proximate security/protection to the Hon'ble Prime Minister of India.

15. Therefore, via the present Petition under Article 226 of the Constitution of India, the Petitioner herein seeks the urgent intervention of this Hon'ble Court for the issuance of an appropriate writ, order or direction, thereby, declaring that in terms of Section 14 of the Special Protection Group Act, 1988 all the Authorities be it civil or military, state, central or local shall act as per the **directions or under superintendence of the Director or any member of the Special Protection Group (Respondent No.2)**, whenever directed/called upon for ensuring the **proximate security**

of the Hon'ble Prime Minister and his immediate family members, while discharging their duties/functions in terms of SPG Act, 1988.

16. That there is no other equally efficacious alternative remedy as prayed for in the present Petition

### GROUNDS

- A. Because in view of the recent incident/lapse that happened in Punjab, *inter-alia*, it becomes evident that Section 14 of the SPG Act, 1988 in its present form lacks the teeth/force to ensure the absolute proximate security/protection to the Hon'ble Prime Minister of India and as such for ensuring the absolute proximate security of the Prime Minister all the authorities be it, state, central or local should in terms of Section 14 of the Special Protection Group Act, 1988 should act as per the **directions or under superintendence of the Director or any member of the Special Protection Group (Respondent No.2)**, whenever directed/called upon for ensuring the **proximate security of the Hon'ble Prime Minister** and his immediate family members, while discharging their duties/functions in terms of SPG Act, 1988.
- B. Because the Respondent No.2 as on date can **only seek assistance** from the authorities and has no power of superintendence, which in the present times is necessary for the purpose of ensuring the 'proximate security' of the Hon'ble Prime Minister, more so, in view of the recent lapse/breach that has taken place because of the colossal

incompetence of the Punjab police.

22

- C. Because the security and safety of the Hon'ble Prime Minister cannot be left to the discretion of the state, more so, in view of the recent incident that has taken place in Punjab and as such absolute control/superintendence for ensuring the safety and security of the Prime Minister should vest only with the Respondent No.2 and no one else.
- D. Because the conduct of the Govt. of Punjab and the Police officials of the state was in clear violation to the dictum as laid down by the Hon'ble Supreme Court in the case of "*Commissioner of Police Delhi and Ors versus Registrar, Delhi High Court, New Delhi*" 1996 6 SCC 232
- E. Because the scheme and the intent of the SPG Act, 1988 was to protect the protected at all times and as such all the authorities, whether state, central or local were duty to bound to aid the director or any member of the Respondent No.2. However, in the present case, the conduct/action of the authorities of the Govt. of Punjab has not only been lackadaisical in conforming to the provisions of the SPG Act, 1988 but the same has also been in contravention to the dictum as passed by the Hon'ble Supreme Court in the afore said case (*supra*).
- F. Because the responsibility for ensuring the safety of the Prime Minister rests with the State Government and the responsibility for providing proximate security will rest with the Special Protection Group (SPG) as per the SPG Act 1988, whereas, in the present case the local Police were seen to be participating with the hooligans which, *inter-alia*,



jeopardized the security of the Prime Minister.

23

- G.** Because there has been a breach in the security of the Hon'ble Prime Minister during his recent visit to the border state of Punjab on 05.01.2022, which, *inter-alia*, is further evidence from the fact that his convoy was stuck and was made to wait on a flyover for more than 20 minutes, thereby, exposing and putting his life at risk to a terrorist attack.
- H.** Because this country has already seen and experienced the consequences of such fatal lapses, more so, when two of our former Prime Ministers were assassinated, as a consequence of such security lapses, thereby, posing a great threat to the National Security of this country.
- I.** Because, as per reports, the confidential route of the Hon'ble Prime Minister was also leaked, thereby, putting him and the life of the common citizens at risk, which, *inter-alia*, is also violative of Article 21 of the Constitution of India. It has also been seen that the Govt. of Punjab including the Police officials of the state instead of coming to the aid of the Respondent No.2 i.e., Special Protection Group in terms of Section 14 of the SPG Act, 1988 were instead creating obstacles in the proximate security of the Hon'ble Prime Minister.
- J.** Because the security and safety of the Prime Minister is of paramount concern and importance and as such the same cannot be allowed to be a subject of politics and as such his security and safety should be absolute without any room for colossal incompetence, which, in the present case has been shown by the Govt. of Punjab.

**K.** Because it is clear from the events that private persons were in the knowledge of the Prime Minister's route, which, *inter-alia*, represents a serious breach of national security by the State apparatus and the political establishment of the State of Punjab.

**L.** Because, the said incident also raises an important question, as if the Prime Minister of the country can face such a situation, then the fundamental rights of citizens which has been guaranteed to them under Article 19(1)(d), 19(1)(g), and 21 of the Constitution of India, are in serious jeopardy.

**M.** Because, the life of the Prime Minister is directly linked to the National security and as such any threat to his life will have serious implications throughout the country and consequently can put the entire country into a state of turmoil, which will be further violative of the rights as guaranteed under Article 21 of the Constitution of India.

**17.** The petitioner further craves the leave of this Hon'ble court to add any other grounds in addition to the grounds as stated in the present petition.

**18.** That in the aforementioned facts and circumstances it is necessary, expedient and in public interest that this Hon'ble court may be pleased to exercise its powers under Article 266 of the Constitution of India and be further pleased to grant the prayers as sought for in the present petition.

**19.** That this Hon'ble Court has the requisite jurisdiction to try and entertain the present petition in as much as the Respondents

are amenable to the jurisdiction of this Hon'ble Court.

20. That the present petition is in conformity with the Delhi High Court (Public Interest Litigation) Rules, 2010.

**PRAYER**

In the aforesaid premises and in the interests of justice, it is most respectfully prayed that this Hon'ble Court may be graciously pleased to: -

- (a) Issue of an appropriate writ, order or direction, thereby, declaring that in terms of Section 14 of the Special Protection Group Act, 1988 (as amended upto date) all the Authorities be it civil or military, state, central or local shall act as per the directions or under superintendence of the Director or any member of the Respondent No.2 i.e. Special Protection Group, whenever directed/called upon for ensuring the proximate security of the Hon'ble Prime Minister and his immediate family members, while discharging their duties/functions in terms of SPG Act, 1988; and
- (b) Issue of an appropriate writ, order or direction, thereby, declaring that the Respondent No.2 shall have absolute power of superintendence for the purpose of discharging its functions in view of the provisions of the SPG Act, 1988; and/or

- (c) Pass/issue any other writ or direction(s) or order(s) as this Hon'ble Court may deem fit and proper in view of the facts and circumstances of the case and in the interest of justice.

**AND FOR THIS ACT OF KINDNESS, THE PETITIONERAS  
IN DUTYBOUND SHALL EVER PRAY**

Place: New Delhi

PETITIONER

Date: 10.01.2022

Through

**V. GOVINDARAMANAN**

**Counsel for the Petitioner**