

To,
The Station House Officer,
Hari Nagar Police Station,
New Delhi

**Subject:- COMPLAINT AGAINST MR. SATYENDAR JAIN AND
ARVIND KEJRIWAL FOR CARRYING OUT ILLEGAL
ACTIVITIES AT TIHAR JAIL, DELHI**

Respected Sir,

1. We i.e. (Mr. Parvesh Sahib Singh, Mr. Majinder Singh Sira and Mr. Tajender Pal Singh Bagga) are respectable citizen of this country who have spent most of their lives for carrying out social activities for betterment of people of Delhi.
2. At this juncture it is very important to bring to your kind notice that on 17.11.2022 The Rouse Avenue Court dismissed the bail application of accused Mr. Satyendar Jain. One of the ground argued by ED in the instant case restricted to the point that Mr. Satyender Jain was very influential person and thus if released on bail he could use his influence to temper the evidences. On the other hand ED even claimed that Mr. Satyender Jain was

enjoying lavish lifestyle at Tihar Jail. On hearing these news we complainant in the instant matter where very disturbed. It was very disturbing that how could someone use his influence so much and thereby breach discipline in Jail Premises.

3. Today I.e. 19.11.2022 we saw a video clipping on Republic TV and other medial houses where it could seen Mr. Satyender Jain was taking massage from other inmates. This clipping was very disturbing for all the residents of Delhi. We immediately pursued various Jail Rules and Delhi Prison Act, 2000 and there by found that Mr. Satyender Jain not only violated various rules and section of Delhi Prisons Act, 2000 but is also trying to set up very wrong precedent at Tihar Jail.

4. Chapter 8 of Delhi Prisons (Discipline, Daily Routine, Offences and Punishments) Rules, 1988 Rule 2 deals with maintenance of discipline. The contents of the same are produced as follows:-

“ **2.Maintenance of discipline.-** *It shall be the duty of all executive officers and guarding establishment of Jail to maintain discipline and order amongst prisoners.”*

Rule 3 deals with strict discipline to maintained day and Night in Jail Premises.

"3. Removal from wards, lock-ups, strict discipline by day and night.- (1) Prisoners, other than those who may at any time be lawfully confined in cells by day and night, shall be removed from their sleeping wards, cells and other compartments, as soon as after day-break as possible, and shall be placed in their proper sleeping wards and looked up for the night before sunset.

(2) prisoners shall be kept and shall remain under strict discipline and control both by day and night."

5. The Delhi Prison Rules, 2018 deals with duties of Superintendent the contents of the same are produced as follows:-

Rule 90:- Duties of Superintendent :- To conduct an inquiry into prison-offences and breaches of discipline, and to punish all those who are found guilty of having committed any such prison offence or breach of discipline:

On the other hand Rule 629 deals with Telephonic and Electronic Communication, the said rule gives power to Jail authorities to withdraw communication facilities if the inmate found to have committed an offence. The Contents of the same are produced as follows:-

Rule 629:- Telephonic and Electronic communication

"The Inmate Phone call system shall be introduced in all the jails so that a prisoner may communicate with his family members through telephone as per order issued by Inspector General of Prisons from time to time. The telephone facilities will be available to all the inmates and shall be contingent upon the good conduct of a prisoner. This facility can be withdrawn temporarily or permanently if any jail offence is committed by a prisoner during incarceration period or otherwise the telephone facility is found to be misused."

6. On the other hand Delhi Prison Act, 2000 Chapter V deals with Discipline of Prisoners which needs to be maintained by superintendent. The contents of the same are produced as follows:-

"27. The discipline in the prison shall be maintained by the superintendent firmly, fairly and in an equitable manner in accordance with the rules."

7. The Delhi Prison Act, 2000 Chapter XI deals with Prison Offences. Section 46 of the act classifies about the same. The contents of the same are produced as follows:-

"5. Immoral or indecent or disorderly behaviour.

27. Any other unauthorised, unlawful or illegal act as may be specified in the rules."

8. Thus from the reproduction of above said rules and section it can be seen that Mr. Satyender Jain has not only taken illegal powers in his hand but he is trying his level best to set very wrong precedent in Jail which will in long run effect the smooth functioning of the Jail. In lieu to the same you are requested to take the matter in your hand and strict action be taken against Mr. Satyender Jain. It is further requested that the copy of the same be also sent to the

IG Delhi Prisons so that he can also take cognisance of the matter and the same be investigated by the concerned authorities.

9. We collectively hope that you will take strict action against Mr. Satyender Jain so that he doesn't take things in his hand and misuse his powers.

10. It is very shocking that concerned authorities should also not spare inefficient behaviour of Jail officials in the instant matter. Thus on the other it is very shocking the Mr. Arvind Kejriwal is not taking any action against Mr. Satyender Jain which clearly shows that Arvind Kejriwal is also involved in these Hawala transactions as Mr. Satyender Jain is collection agent for Mr. Arvind Kejriwal and the huge amount of crores rupees have been collected by Mr. Satyender Jain. on behalf of Mr. Arvind Kejriwal therefore Mr. Arvind Kejriwal is force to provide all the VVIP facilities in jail to Mr. Satyender Jain and is also unable to remove him from his cabinet.

11. Thus in. The interest of justice we request you to register a case against the accused person ie. Mr Arvind Kejriwal, Mr. Satyender Jain and other jail officials involved in various section of IPC and Jail Manual. Delhi

Date :- 19.11.2022

(Mr. Parvesh Sahib Singh)

(Mr. Majinder Singh Sira)

(Mr. Tajender Pal Singh Bagga)