

To,
The Hon'ble Justices of the Supreme Court
New Delhi - 110001

19th April 2019

Subject: Sexual harassment and consequent victimisation of me and my family at the hands of the Chief Justice of India

Dear Hon'ble Judges,

I was a junior court assistant in the Hon'ble Supreme Court from 1st May 2014 till 21st December 2018 when my services were unceremoniously terminated. With great regret and anguish I am having to address this letter to you, to narrate the sexual harassment and consequent victimisation that I and my family have had to go through and the facts and circumstances which disclose the reason why this happened. The extent of victimisation has been such that apart from my services being terminated in December 2018, in the same month my husband and his brother, both head constables with the Delhi Police have been suspended. My husband's other younger brother who was given a job in group D category in the Supreme Court under the Chief Justice's discretionary quota in October 2018, was also terminated without giving any reasons, in January 2019. Not only this, a false and frivolous FIR was registered against me on 3rd March 2019 (alleging that I took an advance of 50000 from a certain Mr. Naveen from Jhajjar, in the Supreme Court premises for offering him a job in the Supreme Court in 2017) on the basis of which I was arrested late at night, shackled from my feet, my husband was beaten up in police custody and handcuffed (though he was not arrested). I was kept in police custody of one day and Judicial custody for one day. Consequently I was forced to obtain bail. There after an application has been made by the police for cancellation of my bail.

I have narrated the entire sequence of events in the attached affidavit which also contains the documents I have in my possession. As you will see from the facts narrated, my and my family's victimisation is a consequence of my not agreeing to the sexual advances made by the Chief Justice of India, Justice Ranjan Gogoi. I did not have the courage to make this complaint earlier because I was terrified of the consequences to me and to my family which I was threatened of and which have indeed come to pass subsequently. However as you can see from the unprecedented and relentless victimisation that I and my family have suffered, I am left with no option but to appeal to your Lordships to take cognisance of this matter.

By this letter I am requesting the Hon'ble Judges of the Supreme Court to constitute a special enquiry committee of senior retired judges of the Hon'ble Supreme Court to enquire into these charges of sexual harassment and consequent victimisation.

Kind regards,



AFFIDAVIT



I, [REDACTED] aged about 35 years, W/o [REDACTED] R/o [REDACTED]
[REDACTED], presently at New Delhi, do
hereby solemnly affirm and state on oath as under:

1. That I have been working in the Supreme Court of India since May 2014, when I was appointed as Junior Court Assistant. Subsequently in 2015, I enrolled for an LLB Degree in CCS University, Meerut, and began pursuing my degree simultaneously. I live in Tilak Nagar with my husband and our 7 year old daughter. My husband has been in Delhi Police since 2003 and has been Head Constable since 2013. In May 2014 as Junior Court Assistant under the Registry of the Supreme Court I was posted in the Legislation Section of the Library of the Supreme Court. In my role as Junior Court Assistant, I was required to do typing and documentation work in the Library and during Court hours I was sent to different Courts to provide support to the Court Masters by arranging for books/judgments that were required during Court proceedings from the library, answering the intercom phone calls etc. For around 8-10 months in 2015 I was assigned to work in the then Justice Vikramjit Sen's Court. A copy of the office order dated 02.05.2014 showing my appointment as Junior Court Assistant in Library is annexed and marked as **ANNEXURE A** at Pages 29 to 30).
2. In October 2016, Mr. Deepak Madan one of the regular Junior Court Assistants in the then Court of Justice Ranjan Gogoi had gone on leave for his marriage. During this period, I was sent to work in Justice Ranjan Gogoi's Court and continued to work there thereafter. During this period my role included providing necessary support to the Court Masters in getting the required books and citations from the library during court proceedings. I worked diligently and had an unblemished record. My Annual Confidential Report (ACR) for the period 2014-15 graded me as "Good" and for the year 2015-16 as "very good". (A copy of the Annual Confidential Reports for the year 2014-2015 & 2015-2016 are annexed as **Annexure B** at page 31 to 32).



That I continued to work in Justice Gogoi's Court. In January 2018 I had to give my LLB 5th Semester exams. Since working in the Court the entire day left me with no time to study I had requested my immediate boss Mr. B.A. Rao to allow me to work in the library where there was less workload and

not to send me to the Court. In January 2018 I worked in the library and also took leave for a few days to go and write my exams, and did not go to Justice Gogoi's Court for around 10 days. When I went back to his Court after my exams, I was told by one of the Court Masters, Ms. X that Justice Gogoi had enquired about where I was, and he also asked about what I keep writing, since I would diligently take notes during Court proceedings. She told me that she told Justice Gogoi that I had gone to take exams. She also told me that since he had noticed that I was not there, from next time I should also ask him before I take leave. After a few days of me re-joining Court work, Justice Gogoi called me into his chamber in Supreme Court for the first time to speak to me privately. He told me that I was very good and quick at getting citations, that he had come to know that I was pursuing law. He enquired about what my areas of interest were, he asked me what kind of work I did in the library, he asked whether I would be able to do research etc. I told him that I would like to do research, that I am very much keen to learn new things, and that I would try to do my level best at whatever work I was assigned. During this meeting Justice Gogoi also enquired about my family, I told him about my husband, daughter. He asked me how I manage my personal and professional life, and was it not difficult to manage it. I told him it was difficult but that I wanted to work. He asked me who looks after my young daughter, I told him that my mother-in-law who lives in our neighbourhood looks after her till 6:00 P.M but that I had to reach home by 6:00 P.M to look after my daughter. I was extremely honoured and happy that Justice Gogoi spoke to me in such a positive manner.

4. That after this meeting, either Justice Gogoi's staff, would call me, or he himself would summon me to his chamber to provide judgments/books. Sometimes the staff who used to work in Justice Gogoi's residence office would call me as early as 8 AM to tell me that Justice Gogoi needed a certain judgment and that I should keep it ready and give it in his Supreme Court Chamber by the time he arrives at 10:00 A.M. Justice Gogoi too would call me to his Supreme Court chamber to ask me to bring books/judgments that he needed. He would also ask me how my work was going, and how my studies were going, as well as how my family/daughter was. On one occasion Justice Gogoi told me that the xxxx matter was going on and he asked me to make a list of States in India with regard to the status of xxxx. After I had completed this work he gave me paper books (case files) and asked me to prepare briefs/summaries. Since this was above my role, I had no idea how to prepare briefs, I asked a Court Master Ma'am, she



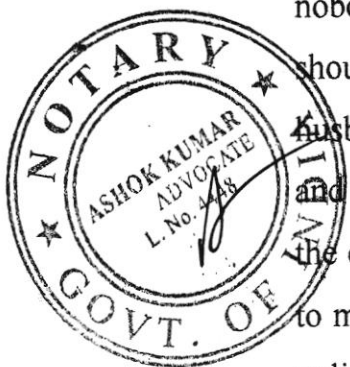
explained it to me, and when I showed Justice Gogoi my first brief he told me how to improve it.

5. On one occasion about 5:30- 6:00 P.M Justice Gogoi found out that I was still working and asked me why I hadn't left since I have to take care of my daughter. I told him that I was taking time to get used to the new work that was being assigned to me. The next day Justice Gogoi called me into his Supreme Court chamber and told me that there should not be any problem at home because of my work. He asked me who was looking after my young daughter, I told him that my mother-in-law looks after her when I wasn't there. To this, Justice Gogoi said, I should keep my mother-in-law happy. I told Justice Gogoi that I have a good relationship with my mother-in-law and also that she was very fond of my daughter as she is the only girl child in the entire family. During these conversations about my family, Justice Gogoi used to ask about other members of my family, and on one occasion I shared with him that my husband was conservative, and he felt that I shouldn't be working but that I was very keen to pursue my career. On another occasion I shared with him that the only concern of my family members and my mother-in-law was that my husband's younger brother who is disabled, was unable to find employment.
6. During these interactions, I was extremely scared and nervous as I did not know how to speak to a Judge, I had never directly interacted with any Judge prior to this and I did not know how to interact with him. I used to find it very difficult to speak or express anything. Justice Gogoi would keep saying I should speak and say what I was thinking and not worry.
7. That from January 2018 to around May 2018, Justice Gogoi would assign various tasks as described above and would call me into his chamber to assign work to me very frequently, almost every few days. Sometimes during lunch hours or after Court hours, he would call from his chamber directly on the intercom in the Court room, which it was my job to answer and ask me to come to the chamber to take instructions from him. That on another occasion when it was Justice Ranjan Gogoi's turn to host the Judges lunch, he instructed me to compile some hindi film songs to be played at the lunch. I was unsure about which songs I was expected to compile and with the help of others I did so and I handed it over.
8. That before vacations started in May 2018 Justice Gogoi gave me some paper books on banking law and told me to read them and make briefs during the vacation. On the last working day of the Supreme Court he called



me to his chamber, and told me that he would be organising a lunch for all his staff on 19th May 2018 and told me that I should also come and that I should coordinate with other staff on how to reach his residence on 19th May. A few days later he got his staff to call on the library intercom to speak to me and again told me that I should definitely come for the lunch. I attended the lunch.

9. During the summer vacation I worked on the work that he had assigned to me and also studied for my final semester law exam which was to be held in June. During the summer holidays he again called me from his residence on the library landline number and told me that on 1st June 2018 there was a book launch of Mr. Kailash Satyarthi's book, and that I should attend it along with my husband. A few days later, he called me to his chamber and again told me that I must attend the book launch which was to be held in Constitution Club and that I should bring my husband since the event would finish late. I explained my difficulty in attending the book launch as I had to write my final semester exam on the same day in Ghaziabad. However, Justice Gogoi insisted that I attend the book launch event, he told me that there would be a lot of important people, that I should get out of my comfort zone of the Court and be a bit more social. He gave me and my husband passes for the Book launch event and on his insistence I could not refuse and so me and my husband attended the event after finishing giving my exam.
10. That in July 2018 when Supreme Court reopened, Justice Gogoi called all his staff to meet him. He asked me about the work assigned to me and I updated him and handed over the work I had completed. He asked me how my vacation was, how my daughter was etc. Subsequently our interactions continued in the same manner. On one occasion he assigned some work relating to the xxx xxxx case to me. On another occasion Justice Gogoi gave me some sweets that had been distributed on the occasion of Justice Banumathi's birthday and told me to give them to my daughter as he had nobody else to give the sweets to. Justice Gogoi would keep telling me that I should bring my husband to meet him, and finally he asked me to bring my husband to meet him on 31st July 2018, in his residence. When my husband and I went to meet Justice Gogoi in the drawing room of his residence on the evening of 31st July 2018, he was extremely warm, he kept praising me to my husband. He asked my husband about his work, they spoke about the police system for a while, Justice Gogoi told my husband, "*jis rank par kaam kar rahi hain, is level se bada upar hain*", "*agar mehnat kare to bohot*



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upar pahunch sakti hain” etc. He made me leave the room and spoke to my husband alone, and I was told by my husband that he again complimented and praised my work and my capabilities. He spent almost 2 hours with us. He told my husband and me that if we ever have any problem we should approach him.

11. In August 2018 Justice Gogoi enquired about my exam results, when I told him I had scored 63% he complimented me and told me even though the college was mediocre, it was a good score. He told me that I don't deserve to be in the Supreme Court, “pulling out books”, “any illiterate person can also pull out books from the Court”. He said I should be doing something better. I thanked him and felt extremely proud that someone of his stature should encourage me and compliment me. One morning Justice Gogoi called me into his chamber, he appeared very irritated and asked me why I didn't answer his calls, I told him that I did not receive any call from him, then he made me show him the call logs on my mobile phone. He kept insisting he called me, then I told him that I have a setting on my mobile phone which blocks calls from unknown numbers. On hearing this, he tried calling me again from his phone in front of him to check if what I was saying was true. On seeing that his call did not go through to my number, he finally believed me and told me to save his number. I thereafter saved his number and also changed the settings of my phone. Justice Gogoi told me that a lot of the work he wants to assign to me is very confidential and important and he would be contacting me on the phone for this but that I should not answer my phone in front of any family members since he may require to communicate confidential information to me. Justice Gogoi gave me a phone number (9667999424) and told me that it was his private number and only one of his trusted staff, Mr. Manmohan Rawat had it. Justice Gogoi also gave me another number 8826444122 and told me that this number is to be used for whatsapp communication.

12. That even after this Justice Gogoi would regularly call me into his chamber in the Supreme Court and assign various tasks to me. He would ask me to prepare briefs in various cases. I was extremely grateful and happy that I was getting to do work that was usually assigned to my superiors/law clerks and that I was getting an opportunity to learn legal skills alongside my work. During our interactions Justice Ranjan Gogoi told me that he considered me as an asset to his work as a Judge and hence took a keen interest in my work.



He told me that if required he would arrange for a computer and desk to be installed inside his chamber and I could work there itself. Justice Gogoi would message me on whatsapp and call me several times during the day regarding work, during non-Court hours and even during the late evenings when I was at home. He would tell me that in the morning before I left for office I should call him and find out whether he needed anything, books/material and that I should then keep it ready by the time he reached the Supreme Court chamber.

13. In early August 2018 Justice Gogoi called me into his chamber, he told me that as he was going to become the Chief Justice of India, he needed staff that he would be able to trust and someone who was competent and efficient. He said that he had been observing me for the past two years, and that I had all these qualities. He explained to me that he expects certain quality of work, that he knew I was a junior employee but that he found these qualities in me and that I was very good at my work and was also able to keep things confidential. Justice Gogoi said he would need someone to work in his residence office and asked me who he would need to speak to in order to arrange for me to be transferred to his residence office. I told Justice Gogoi that Mr. B.A. Rao was my immediate boss. Mr. B.A. Rao was called to the chamber and informed by Justice Gogoi that I would be transferred to the residence office. Justice Gogoi then told me to speak to Mr. H.K. Juneja, the Private Personal Secretary to discuss the transfer. Mr. Juneja briefed me about my role, he told me the work would be of an extremely confidential nature, he gave me strict instructions that none of the work should be discussed with anybody, not even my husband. Mr. Juneja told me that I would be expected to do all and any work that I was asked to by Justice Gogoi. Mr. Juneja also told me I was the youngest employee to be appointed in this post and that I should be very happy to work with a person like Justice Gogoi. I expressed my gratitude at being assigned such an important and prestigious role so early in my career. I also told Mr. Juneja that I was concerned about my work timings, since I have a young school going daughter who needed my care at home. Mr. Juneja assured me that my office timings of 10 A.M to 5 P.M would not be disturbed and I would be able to go home in time.



14. From 11th August 2018 onwards, I was posted at the Residence Office of Hon'ble Justice Ranjan Gogoi, at 10, Tees January Marg, New Delhi. Just before I was posted at the residence of Justice Gogoi, Ms. Pooja ma'am, the

staff who was posted in the residence office, was transferred back to the registry/Supreme Court. I sensed that my transfer to such a prestigious position despite being a junior employee and specially the fact that I did not know shorthand which was a skill required by most of the staff, caused some resentment against me amongst the other staff. Justice Gogoi told me that since I was such a junior employee, the official transfer order would take some time to be issued. The transfer order was issued later the same month. (A copy of the office order dated 27.08.2018 is annexed as **Annexure C** at Page 33 to —).

15. During my posting in the residence office of Justice Gogoi, initially my timings were from 10 A.M to 5 P.M. However, gradually I was required to come earlier, even as early as 8:15 A.M. When I joined, Mr. Manmohan Rawat and Mr. Arjun were also posted in the residence office in the morning shift, however they would come alternate day. Both were shorthand staff. However, soon after I started coming to his residence in the morning, both Mr. Rawat and Mr. Arjun started coming later in the day after Justice Gogoi used to leave for the court. One Mr. P. Rao used to come in afternoon. He along with Mr. Arjun were soon thereafter shifted to the Court registry. In the mornings, myself and peons, Vijay Bhaiyya and Gopi ji would work in the residence office. Justice Gogoi would work in his residence office room from around 8:00 A.M to around 9:00 A.M or when he would leave for the Supreme Court. He would return at about 4:30-5:00 or sometimes even before that, whenever the Court rose on that day. One of the staffs in the Supreme Court, once when we were speaking on the phone regarding work, commented that now that I have been transferred to the residence office, Justice Gogoi was leaving his Supreme Court chamber early. In the mornings I would be required to check the letters received by Justice Gogoi, segregate them according to the issue and according to urgency. I would be required to take down dictation, do some research and manage the files. In the 1.5 to 2 hours in the morning, he would summon me to his office room at least 3-4 times.

16. That on one occasion, Justice Gogoi called me into his office room and told me that I should send him a whatsapp wishing him "Good Morning" every morning, and that every evening I should whatsapp him after reaching home. On being told this I felt it was a bit strange. But I was very junior, I had never interacted with a Judge before this, and I told myself that maybe



this was normal. Until that point I had never had any direct interaction with a Judge. We were all told not to even look at a Judge while working in the Court. The way in which Justice Gogoi treated me and assigned important work to me felt like a privilege. He kept telling me to send him a message every morning wishing him Good Morning and so I used to message him by around 6:00- 6:30 each day wishing him Good Morning. Justice Gogoi would reply to these messages by wishing me Good Morning, or asking me how I was etc. A few times in the morning at the office he would tell me, "oh, you were on whatsapp till 12:00 in the night." He also told me to whatsapp him each day after reaching home. If I did not message him, he would send me a whatsapp with just a question mark "?", to which I was expected to reply that I had reached home, or the next day he would mention it and ask me why I did not message him.

17. When I reached the residence office by around 8:00- 9:00 A.M, Justice Gogoi would assign tasks to me, he would call me into his office room, make me show him my phone and make me delete the whatsapp messages between us. Since the whatsapp messages between us also included certain instructions he gave me about confidential work etc, I assumed that he did not want any messages to remain on my phone. Despite that, I found it strange but I felt I did not know enough and since he was extremely encouraging and supportive of my work, I told myself that there was nothing wrong with these things. Once when I was suffering from a gall bladder stone, Justice Gogoi he enquired about my health and suggested some Doctor I could visit.
18. On one occasion when Justice Gogoi had called me into his office room, he told me that I was one of his assets. He said that he had three assets, his wife, his daughter and me. He told me that for his Oath taking ceremony (as Chief Justice of India) after his wife and mother, "*you will be the third person I will be inviting*". Justice Gogoi told me that since he was due to become Chief Justice of India, it was very important for me to work diligently without taking any leave. In his residence office, I was often required to come to work very early even as early as 8:15 A.M and required to stay till after 5:00 P.M, since I had to be at home by a fixed time, Justice Gogoi made arrangements for me to be dropped to the closest metro station in one of the cars of National Legal Services Authority (NALSA) that would be stationed at his residence as he was the then Executive Chairman of



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NALSA. One of the cars was black and another was white, and the name of the driver was Mr. Manoj.

19. That during the course of my work at the residence office of Justice Gogoi, he would repeatedly tell me that once he became the Chief Justice of India, he would be in a position to help me, and that I should tell him what I needed and he would see how he could help me. Since I had concerns about reaching home late, Justice Gogoi once offered to provide me and my family accommodation that was located closer to his residence, so that I could be readily available whenever required at office. I expressed my gratitude but politely told him that we were very comfortable with our present accommodation. I told him that my family was reasonably well off and comfortable, that my husband and his brothers had government jobs. During the course of this conversation I mentioned that only my younger brother-in-law was unable to find a job as he was disabled, Justice Gogoi then assured me that once he became the Chief Justice of India he would have the power to make appointments to the Supreme Court Registry staff through the Chief Justice's discretionary quota and he would see what he could do.

20. That in October 2018, before the Oath taking ceremony as Chief Justice of India, Justice Gogoi asked me to work on preparations for a party at his residence. He invited my husband too for this party, though he did not invite the spouses of any other staff except Mr. Manmohan Rawat, a senior staff. On 2nd October 2018 during the function at his residence, Justice Gogoi's daughter and her husband too were present. (A copy of the photograph taken at the party on the 2.10.2018 are annexed as **Annexure D** Page 34). I was also invited along with my husband for the swearing in ceremony of Justice Ranjan Gogoi when he was appointed Chief Justice of India. Again, while other staffs were invited, most of their spouses were not invited. (A copy of the invitation card for myself and my husband for the swearing in ceremony and the car parking for the Rashtrapati Bhawan are annexed as **Annexure E** at Page 35 to 36).



That after Justice Gogoi took oath as CJI, on one occasion he made me conduct interviews for law clerks, I conducted the same and chose one Ms. Kruti, an advocate from Mumbai.

22. That soon after his appointment as CJI, he asked me for the resume of my brother-in-law Mr. Anil Kumar, he read the resume and pointed out some grammatical and other errors and kept it with him. A few days later, my brother-in-law was called for an interview and appointed as Court attendant

in group D category in the Supreme Court through the CJI's discretionary quota. (A copy of the appointment letter dated 9th October 2018 is annexed as **Annexure F** at page 37).

23. That on 10th October 2018 morning, the CJI called me into his office room, CJI told me that my brother-in-law, who suffered from 60% disability in his legs had been appointed, and that he had ensured it despite the fact that my brother-in-law was found to be medically unfit as traces of blood were detected in his urine test. While he was telling me this, I kept expressing to the CJI how grateful me and my family were that Lordship had arranged for a job for my brother-in-law.
24. Though I usually wear a uniform of black and white clothing, on that day since it was the first day of Navratri, I had worn an orange kurta and dupatta. The CJI referring to my clothes, told me, "You are looking pretty good today." The CJI asked me to come and stand next to him, he got up from his chair. The CJI then asked me, "What can you do for me?", I kept repeating that I was very grateful and that everybody in my family was very happy. The CJI then slid his hand from the back of my head, along my back to my hipline, till my lower back. I immediately froze and my body stiffened. I think the CJI sensed this, and so he immediately pulled both my cheeks, like one would do to a child. He told me that he is like this with his daughter too.
25. CJI again asked me what I could do for him, when I again said I was very grateful, he said "*No, No, I know you will not speak, so write it down and show it to me*". The CJI then went on to casually assign some daily tasks/work for me to do. I was stunned and shocked as I immediately realised that the CJI had touched me in an extremely inappropriate manner. However, I did not know how to respond immediately, I was extremely tensed, I told myself, "*bade log, maybe this is normal behaviour*". I suppressed my discomfort because I was stunned and shocked that man of his stature could do something like this. I went back and tried to continue doing my work.



26. That on 11th October 2018 morning, the CJI again called me into his residence office. As I do often, I stood at the door to the room with my notepad and pencil, he instructed me to sit in the chair across the desk from him. He once again brought up the issue of my brother-in-law's appointment. CJI said your whole family must be very happy. He told me that "*If you put on some weight you will look good*", He offered me some

sweet/prasad that was in his room, saying you should be giving sweets since your brother-in-law has got a job. The CJI once again asked me, "So, *what can you do for me*". He asked me whether I have written anything down, I showed him a note pad on which I had written how grateful I was, I do not remember my exact words, but I had written as follows, "...*Your Lordship is a blessing to me, words cannot describe how thankful I am... I will always be grateful for all that Your Lordship is doing for me... My entire family is grateful to you... I am so grateful for your support...*". The CJI read the note. He then got up from his chair and walked across and came and stood to my left. Since he was standing I too stood up as I could not continue sitting when the CJI is standing. He took my notepad from my hands and put it aside on the desk, he then took my hands into his and told me that my hands smell nice, he then pinched my cheeks, he then put his arms around my waist from the front, he said, "*I want this from you*". When I had stood up I had put my hands behind my back. He hugged me around the waist, and touched me all over my body with his arms and by pressing his body against mine, and did not let go. He told me "*hold me*", he did not let go of me despite the fact that I froze and tried to get out of his embrace by stiffening and moving my body away. Since he did not stop forcibly hugging me, I was forced to push him away from me with my hands. When I pushed him away, he hit his head against a book shelf/cabinet on my left. My first thought was why would the CJI think he can do something like this to me. I immediately left the room and was in a state of complete shock and was unable to think clearly after this. I sat at my desk.

27. After about 10-15 minutes the CJI called me to his office again and told me "*Jo yahan hua hai, you will not share with anybody*". He told me that if I disclosed anything to anybody, my family would be greatly disturbed. I understood what he meant. I was so upset and scared that I said, yes of course your Lordship. Then he told me, write down that you will not disclose. I had a piece of paper and pencil, in my hand, my hands were trembling, I wrote down what he dictated which was something like "*I will not harm your dignity. Can you hold me*". I was extremely scared, I knew what he was dictating was wrong, and that he was making it appear that it was me who tried to hold him. However, I was so scared and shocked that I wrote whatever he dictated. Due to the incident I was extremely distressed, shocked, I was panicking and felt a bit dizzy, I was not able to work, I put my head down, and left at my usual time.



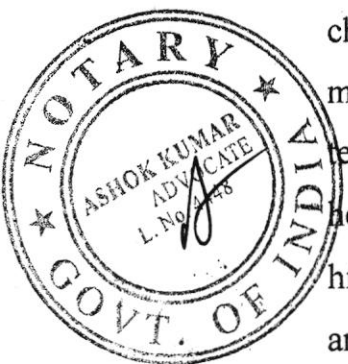
28. That evening after reaching home, to my surprise I received several phone calls from Mr. Badar, Admin Department, Supreme Court Registry, I did not answer most of the calls, finally when I spoke to him, he inquired about whether I had reached home ok and whether things were ok between my husband and myself. I told Mr. Badar that everything was fine and there was no problem with my husband. I then realised that the CJI had probably told Mr. Badar a concocted story and asked him to check up on me, since the other staff in the office had noticed that something had happened and that my behaviour was not normal on that day, and I had not done any work and left office. Moreover, I had never received calls from Mr. Badar earlier. Secy General of the Supreme Court Mr. Mathani also called me that evening and enquired about me in the same manner. (A copy of the call logs on the 11th of November 2018 are annexed as **Annexure G** at Page 38 to 39)

29. That same night when I regained my senses and was able to think clearly, I called the CJI on his phone because I wanted to tell him that I could not work with him any longer. He did not receive my call. Instead he made his Personal Secretary, H.K. Juneja call me to tell me not to disturb Justice Gogoi at night. Though till then it was normal for him to whatsapp and call me at odd times.

30. I later also got to know from neighbours, named Harvinder, and Mrs and Mr. Dwivedi and others, that the SHO, Tilak Marg called Yashpal, the Colony President where I live, to make enquiries about my family and whether things were stable between me and my husband.

31. The next day, 12th October when I went to office, the CJI's behaviour changed dramatically. After this incident he began calling Mr. Ajay Jain to his residence office in the morning shift. He stopped calling me inside his chamber as often. Now when he did call me inside his chamber, he would most of the time insist that one of the Peon's accompanied me, or he would tell me to leave the door to his office room open, unlike earlier. Once when he called me inside his office room he told me that I should continue to send him messages wishing him Good Morning and I should continue to behave and work like before.

32. Though I had wanted to quit, I did not have the courage to take the step or communicate anything to him. I feared it would make him angry. I did not know how else I could behave or what else I could do, I simply did what he told me to do. A few days after this the CJI left to visit Guwahati and due to



Dussehra holidays the Supreme Court was closed. When he was in Guwahati the CJI called me on my mobile phone, however I did not answer. When he returned, he pretended as though everything was normal. He asked me why I didn't answer his call. At work I was extremely scared and nervous, I was unable to do my work properly. Mr. Manmohan Rawat noticed that I was constantly tensed and asked me whether everything is alright. I knew I could not speak about what happened to anybody, so I told him I was fine. I was unable to tell even my husband about what had happened as he anyway thought that I should not be working outside the house. I was not able to tell anybody else and tried to continue work and suppress the incident and forget about it. During this time my work was suffering.

33. Thereafter, my work life changed dramatically overnight. My victimisation and harassment began that led to my final dismissal on the basis of a departmental enquiry report that charge sheeted me on completely motivated and frivolous grounds. I was transferred arbitrarily three times to different departments within a short span of a few weeks.
34. On 22nd October 2018, I was transferred out of the residence office of the CJI and posted in the Centre for Research and Planning (CRP) in the Supreme Court. I was relieved that I would not have to work in the residence office anymore. When I began work in CRP, Mr. B.A. Rao my previous supervisor commented that I have been assigned work with great responsibility, I automatically responded and said something about how not everything is how it seems, "*jaisa dikhta hai waisa hot nahin hai*". (A copy of the office order dated 22.10.2018 is annexed as **Annexure H** at Page 40 to _____).
35. That around end October, the CJI visited the CRP with Hon'ble Justice Bobde and Hon'ble Justice Ramana. The CJI spoke to me and told the two Justices that I was a very good worker and very bright. A few days after this, on 26th October 2018, the CJI tried to call me on my mobile phone, I did not answer, then he sent the Secretary General to bring me to his chamber in the Supreme Court. CJI asked me whether I wanted to rejoin work in his Court. I was not able to look him in the eye, but firmly told him that I want to continue in the CRP in the Supreme Court.
36. On 16th November 2018, my seat was changed to Admin Material Section. I applied for leave for the 17th of November which was a Saturday and hence half day since I had to attend my daughter's school function. My Supervisor



advised me to report to work after the function. However since the school function went on till 12:15 P.M. I could not report to work, it being a Saturday and hence half day. I however kept updating my supervisor regarding the delay at my child's school and inability to attend work on that day.

37. On 19.11.2018, I was issued a memorandum by Registrar Deepak Jain stating that I had rendered myself liable for action under the provisions of the Conduct Rules for questioning the decisions of senior officers regarding change of my posting/seat and for taking unauthorised leave. On these flimsy charges, I was asked to furnish an explanation as to why disciplinary proceedings should not be initiated against me. (A copy of the memorandum dated 19.11.2018 is annexed as **Annexure I** at Page 41 to —).
38. On 22.11.2018 I submitted my written reply stating that I did not approach anyone to seek a change of seat and had no intention to question my senior officers decision. I further stated that I had applied for casual leave for the 17.11.2018 and was asked to report to work for a few hours. However I was unable to come in to work since my daughter's school function continued till 12:15p.m. (A copy of the reply dated 22.11.2018 is annexed as **Annexure J** at page 42 to —).
39. On the very same day 22.11.2018, I was again transferred to the Library Division. This being my third transfer in one month. (A copy of the office order dated 22.11.2018 is annexed as **Annexure K** at page 43 to —).
40. On 26.11.2018, I received another memorandum that the explanation submitted by me was not found satisfactory at all and hence further action was being contemplated against me under the Rules. (A copy of the memorandum dated 26.11.2018 is annexed as **Annexure L** at page 44 to —).
41. On 27.11.2018, I received a suspension order stating that since disciplinary proceedings were being contemplated against me, I was being placed under suspension until further orders. (A copy of the suspension order dated 27.11.2018 is annexed as **Annexure M** at page 45 to —).
42. That I received a memorandum that it is being proposed to hold an inquiry against me under Rule 13 of the Supreme Court Officers and Servants



(Conditions of Service and Conduct) Rules, 1961. The substance of the allegations were annexed in the "Article of Charges" along with a statement of imputations. The article of charges briefly can be summarised as follows:

Article no. 1: That on being shifted to the Admn Materials (Annexe) I had shown reluctance, felt dissatisfied with the sitting arrangement and not only questioned the decision of senior officers, thereby acting in a manner prejudicial to discipline.

Article no. 2: That on being shifted to Admin Material Sections, I immediately tried to bring influence and exert pressure from unacceptable quarters to have my seat changed. Thus, acting in a manner prejudicial to discipline.

Article 3: That I unauthorisedly absented herself from duty on the 17.11.2018, thereby showing insubordination, lack of devotion to duty and indiscipline.

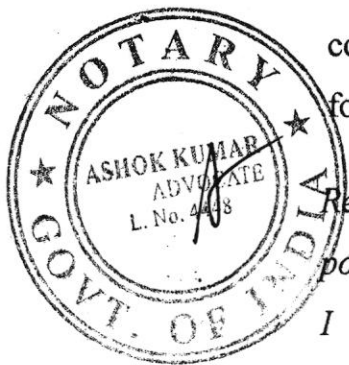
Based on these charges the memorandum stated:

"All the above acts (named or otherwise) of commission and omission committed by you... show that you have acted in a manner unbecoming of a court servant prejudicial to discipline and good order and thus committed misconduct, violating the provisions of Rule 24(1) & (2) and Rule 25(1) of the Supreme Court Officers and Servants (Conditions of Service and Conduct) Rules, 1961 rendering yourself liable for disciplinary action."

(A copy of the memorandum dated 27.11.2018 along with the Article of Charges and Statement of Imputations is annexed as **Annexure N** at Page 46 to 52).

44. That by my reply dated 6.12.2018 I denied each and every charge. I raised the objections that there was no misconduct and the charges were completely false. My reply to the three charges above can be summarised as follows:

Reply to Article of Charge 1: That within a period of three weeks, I had been posted to three different places. Being extremely anxious and insecure, what I expressed to the Branch Officer, Admin Materials Section was not reluctance to perform duties assigned to me but only my anxiety at being allotted three posting in a short span of time.

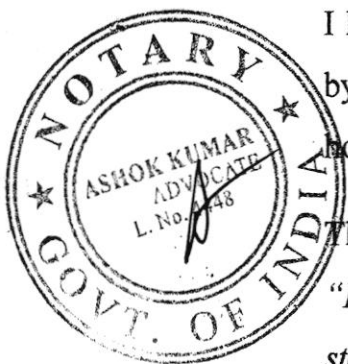


Reply to Article of Charge no 2: That I approached the President of the Supreme Court Employees Welfare Association with whom I had worked earlier. I only requested him to find out whether I had done something wrong for which my seat was being repeatedly changed. I deny asking him to speak on my behalf to anyone or to bring any influence to bear on anyone.

Reply to Article of Charge no. 3: That on the 17.11.2018, I attended my daughters school function. I had sought leave and was directed to attend office for sometime. However since the school function went on till 12:30, I was unable to attend to her duty on that day and report to work. I kept the branch officer informed about the delay at my daughters school.

45. On the 10.12.2018, I received a notice that a Departmental Inquiry is being conducted into the charges of misconduct and Shri Surya Pratap Singh, Registrar was being appointed as Inquiry Officer to conduct the Departmental Inquiry.
 46. On 15th December 2018 I wrote to Mr. Surya Pratap Singh, the Enquiry Officer that I wished to appoint Mr. Laxman Singh, Sr. Section Assistant in Rajya Sabha as my defence assistant. However I was not given any opportunity to avail the assistance of Mr. Laxman at any of the enquiry hearings. (A copy of the petitioners letter dated 15.12.2018 is annexed as **Annexure O** at Page 53 to 54).
 47. On 17th December I was asked to appear for my Defense Statement at 10:30 a.m. I reached the court and got a pass made at 10:19a.m. (A copy of the pass is annexed as **Annexure P** at Page 54A to 54). By 10:25a.m. I was sitting outside the room of the enquiry officer and I sent word to him through the peon that I had arrived. I was very distraught and nervous and began crying and when I was waiting in the gallery, outside the enquiry office, a peon brought me some water. After that I fainted. I later learnt that I had been taken from the Supreme Court to Ram Manohar Lohia Hospital by some members of the staff of the court. My medical report at RML hospital shows that I was brought there unconscious by the staff.
- The medical report of Ram Manohar Lohia Hospital dt.17/12/18 records, "Posted as Junior Court Assistant staff in Supreme Court. History as told by staff) → He is not knowing properly. Sudden onset of hyperventilation. H/o loss of consciousness. Patient was found lying on floor and not responding to any command with her eyes opened and staring on ceiling.

Patient was brought in this condition to RML emergency"



(A copy of the medical report is annexed as **Annexure Q** at Page 17 55 to 64A)

49. On 18.12.2018, I received a communication from Mr. Deepak Jain, Registrar Admin 1 that a Departmental Enquiry was conducted against me and all the charges levelled against me had been found proved. It was further stated in the said communication that the Disciplinary Authority on consideration of the Report of the Inquiry Officer and record of the Inquiry, has recorded the following findings on the above charges on 18.12.2018:-

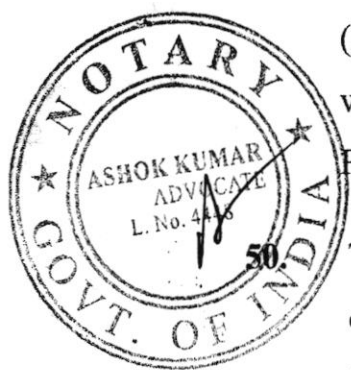
"Perused the record of inquiry and considered the Inquiry Report. As per the Inquiry Report, the two departmental witnesses were examined and their statements were recorded on 15.12.2018. The departmental witnesses were cross examined by the delinquent official. Thereafter, the delinquent had been given opportunity to lead evidence in support of her defence and the Inquiry officer fixed 17-12-2018 for defence evidence. However, the delinquent official neither appeared before the Inquiry Officer on 17-12-2018 nor she moved any request for adjournment. Therefore, the Inquiry Officer decided to proceed with the inquiry ex parte against her.

...and you are called upon under Rule 13(10) (I) (b) of the Rules ibid to submit such representation as you may wish to make against the proposed action latest by 20-12-2018 and further to show cause why one of the major penalties including penalty of dismissal from service under such clause (iv) to (vii) of Rule 11 of the above Rules should not be imposed upon you for the aforementioned misconduct." (Emphasis added)

(A copy of the communication dated 18.12.2018 from Mr. Deepak Jain along with the Enquiry Report dated 18.12.2018 are annexed as **Annexure R** at Page 65 to 92).

The Enquiry officer records in his Enquiry report at page 12 that I was given opportunity to lead defence evidence but I did not appear at the hearing on the 17 of December 2018 and therefore it was ordered that the enquiry would proceed ex-parte.

51. On 20.12.2018, my husband submitted a hand written note to the Registrar Mr. Deepak Jain stating that he was submitting along with his note, my Defence Statement. He also stated in his letter that I was called to the Supreme Court to present my defense before the enquiry officer on the 17th



of December 2018. However since I fell sick and fainted in the Court I was taken to the RML hospital by the staff. (A copy of the letter dated 20.12.2018 is annexed as **Annexure S** at Page 93 to 94).

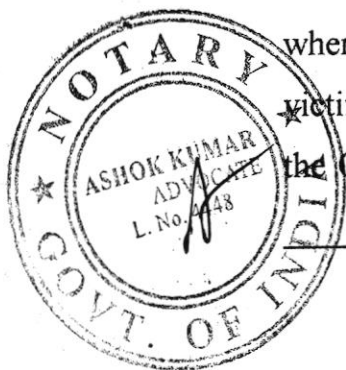
52. My husband also submitted my Defence statement on the 20th of December wherein I completely denied all the charges against me. (A copy of the Defence statement is annexed as **Annexure T** at page 95 to 98).
53. However the very next day that is 21.12.2018, to my complete shock, I was dismissed from service without granting me any further opportunity. The Disciplinary Authority passed the following order:

"Having considered the representation dated 20-12-2018 given on behalf of Ms. Alka Rani, Junior Court Assistant (under suspension) in response to show cause notice dated 18-12-2018 issued to her and her Statement of defence dated 17-12-2018; in light of material on record and the Report of the Inquiry Officer dated 18-12-2018, it is decided to reject the representation of the delinquent official as it is without substance and to accept the findings recorded by the Inquiry Officer as the same are well founded and which are to be read with the tentative statement of Findings."

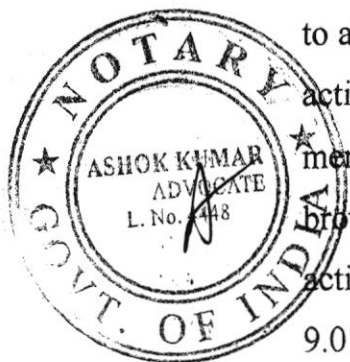
Based on this, the Order of dismissal states as follows:

"Now Therefore, in compliance of the above Order of the Disciplinary Authority, the delinquent employee, Ms. Alka Rani, Junior Court Assistant (under suspension), is hereby imposed a penalty of dismissal from service as provided in Rule 11(vii) of the Supreme Court Officers and Servants (Conditions of Service and Conduct) Rules, 1961 with effect from the date of Order dated 21-12-2018."

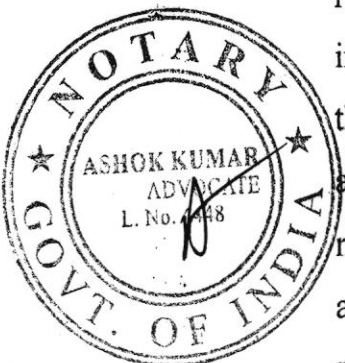
54. That after I was suspended, I finally told my husband about the incidents of 10th and 11th October 2018 when the CJI had made sexual advances towards me.
55. It is shocking that soon after my suspension on the 27.11.2018, my husband, Mr. Dharam Singh who has been a Head Constable with the Delhi Police since June 2013 was suddenly transferred from the Crime Branch division where he was working to the third battalion. From here began the victimisation and harassment of my husband and his brothers. (A copy of the Order dated 3.12.2018 is annexed as **Annexure U** at Page 99 to



56. On 28.12.2018 my husband Mr. Dharam Singh received a call in the late evening that he along with his brother Mr. Pyare Lal (also a constable with the Delhi Police) have been suspended from service.
57. On 29.12.2018, Mr. Dharam Singh received a letter of suspension. The letter did not mention any reason for suspension apart from stating the suspension "pending enquiry into his conduct." (A copy of the order dated 29.12.2018 is annexed as **Annexure V** at Page 100 to —).
58. On the same day, my husband made calls to Mr. H.K. Juneja, the personal secretary to the Chief Justice of India, requesting him to arrange a meeting with the Chief Justice of India who alone would be able to help us in our situation as we had by then realised why all these things were being done to us, and why suddenly every member of my family was under attack. However Mr. Juneja denied any knowledge of our situation. (A copy of a voice recording between Mr. Juneja and Mr. Dharam Singh is annexed as **Annexure W** at page 137 to —).
- (A copy of the screen shot of the message from Mr. Dharam Singh to the Mr. Juneja is annexed as **Annexure X** at Page 101 to —).
59. On 31.12.2018, my husband was informed that a complaint has been made against him for making unsolicited calls to the Personal Secretary of the Hon'ble Chief Justice of India.
60. On the 2.1.2019, to our great dismay and shock, my husband received orders from the Dy. Commissioner of Police Vikas Puri, stating that a departmental action has been initiated against him as he made unsolicited calls to the office of Hon'ble Chief Justice of India, amounting to official misconduct. (A copy of the order dated 2.01.2019 is annexed as **Annexure Y** at Page 102 to —).
61. On 9.01.2019, my husband received an order from the Dy. Commissioner of Police, Vikas Puri. The order stated that it was alleged that my husband had links with local gamblers and that he had approached the SHO Tilak Nagar to allow satta activities of one person against whom a criminal case for satta activities was already registered in PS Tilak Nagar. The order also mentioned the registration of a criminal case against my husband and his brother in the year 2012. On these charges, the order stated, departmental action would be initiated against my husband. (A copy of the order dated 9.01.2019 is annexed as **Annexure Z** at Page 103 to 104).



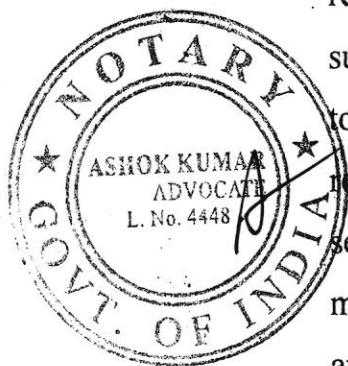
62. It is important to mention here that in the FIR no. 86/2012, under S.323, 341, 34 IPC the matter got compounded between the complainant and my husband and his brother and on 12.01.2017. (A copy of the order dated 12.01.2017 is annexed as **Annexure AA** at Page 105 to —).
63. My husband's harassment continued as he was then transferred from the 3rd Bn DAP to the 2nd Bn DAP so that joint departmental enquiries could be carried out against him and his brother.
64. After dismissal from service on completely frivolous and baseless charges that do not warrant the severe penalty of termination of services, my harassment continued. On 10th January 2019, my husband was called by Mr. Naresh Solanki, the SHO, Tilak Marg, Police Station. My husband was told by the SHO that if I apologised to the Chief Justice of India, our problems would be sorted out and nothing further would happen. My husband and I could not understand what I had to apologise about, when we tried asking the SHO, he claimed he doesn't know anything but that I should just apologise.
65. On 11th of January 2019, the SHO again called my husband and informed him that we should be present at the Police Station by afternoon. We met the SHO at the Police Station. The SHO called Mr. Deepak Jain, Registrar Supreme Court of India, in our presence and coordinated with him as to how we should reach the residence of the Chief Justice. Then the SHO changed out of his uniform into civil clothes and took us in a white colour Maruti Swift car with license plate no. HR 10 W 4654 to the residence of the Chief Justice of India. There Mr. Deepak Jain, Registrar was already present. Mr. Deepak Jain took me to Mrs. Gogoi in the CJI's residence. In the presence of the SHO and Mr. Deepak Jain, Mrs. Gogoi told me "*naak ragad ke jao*". I do not know why Mrs. Gogoi was involved in this. But by this time I had realised that the CJI has concocted a false story about the sexual harassment incident. This was also the reason he had made me write a note to the effect that I wanted him to hold me, whereas he had made sexual and physical advances to me. However by this time the only thing I wanted was to save myself and my family. I fell at the feet of Mrs. Gogoi and rubbed my nose at Mrs. Gogoi's feet, and said "*sorry*". And then we left. The CJI was not present there at this time.
66. After that I was brought back by the SHO to the Tilak Marg Police Station. He changed back into his police uniform. Thereafter the SHO had a long conversation with me and my husband at the Police Station which I recorded



on my phone. The SHO told us that now that we had done the apology things would improve for us and that in a day or two he would try to meet Mr. Deepak Jain again regarding my case. He also told us that we need not get into why I was made to apologise to Mrs. Gogoi and told us not to share anything with any employees association, etc. The SHO further asked me to narrate to him what had exactly happened and that he would get an opportunity to meet the Chief Justice of India. I narrated to him the incidents of sexual harassment at the Chief Justice's residence. I also told the SHO on his asking that I did not know how this matter came to the notice of Mrs. Gogoi. The SHO also told me that he felt that all this happened with me because perhaps the staff got to know about the matter. I told him that I had not informed or spoken to anyone since I was instructed by the Hon'ble Chief Justice of India not to talk about it to anyone or else I would face consequences. (A copy of the video recording of our conversation with the SHO after returning from Hon'ble Chief Justice residence is annexed as **Annexure BB** at Page 137 to —) & (A copy of the relevant portions of the translated transcript of the video recorded conversation with the SHO is annexed as **Annexure CC** at Page 106 to 111).

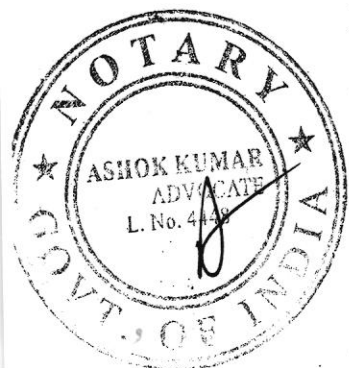
67. That on 14th January 2019 my disabled brother-in-law Anil Kumar who had been appointed as Temporary Junior Court Attendant at the Supreme Court of India received an Order terminating his services with effect from the afternoon of 14th January 2019. This handicapped brother-in-law had been appointed in October 2018 from the discretionary quota of the CJI.
68. During the next two months I was in complete depression and would suffer from panic attacks. I received a call from my colleague that rumours were being spread in the Supreme Court that I had been suspended and dismissed from service because I had passed on work related information from the residence office of the CJI to my husband and had after that committed suicide. These false stories depressed and tortured me further. I was not able to understand why we were being so badly victimised even though I had remained silent as directed by the CJI and not disclosed the incidents of sexual harassment to anybody. I stopped taking calls and confined myself to my house. I consulted with psychiatrists and neurologists for lack of sleep and depression. (A copy of the OPD card, AIIMS, Delhi dated 16.01.2019 is annexed as **Annexure DD** at Page 112 to 114).

69. FIR no. 0021 - dated 03.03.2019, was registered at the instance of one Naveen Kumar, son of Satbir Singh (resident of Jhajjar, Haryana, Mobile



No. 9466675666) under various penal provisions of the Indian Penal Code, u/s 420/ 506 read with section 120 B of the IPC - at the Police Station - Tilak Marg against myself and my husband Dharam Singh (copy attached). The registration of the said FIR was not known to me until the police reached our village in Rajathan on 8/9.03.2019.

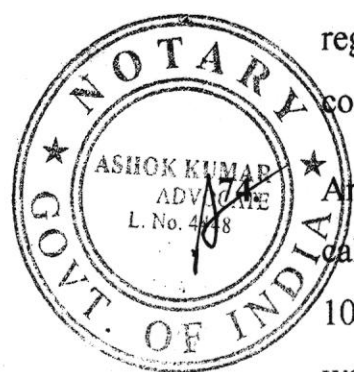
70. We were out of town at my husband's village & post office- Togra Kalan, Tehsil - Nawalgarh, District - Jhunjhunu, Rajasthan on 08.03.2019. At around 10 pm on 08.03.2019, a team of police officers including Inspector Parminder Singh, SI Dharmender Kumar, one lady constable, a constable and a driver arrived at the aforesaid address in a private car [HR-14L-3494]. That Inspector Parminder Singh asked me and my husband, Dharam Singh to accompany them to police station - Tilak Marg, as the SHO of Tilak Marg PS wanted to inquire regarding a complaint lodged against me and my husband. The police team threatened me and my family and asked us to accompany them in the night to Tilak Marg Police Station, Delhi. I requested Inspector Parminder Singh not to take me to Delhi during night and promised to accompany them to Tilak Marg Police Station, at Delhi in the morning of 9.03.2019 to which the police team agreed. We were unaware of the alleged incident regarding which I was being forced to come to Delhi at Tilak Marg Police Station but due to fear and shock could not protest against the same.
71. In the morning of 09.03.2019 when my husband asked the police team to give some notice to which the SI Dharmender Kumar, at around 9.45 am issued notice under section 41.1 of the Cr. PC requiring my attendance at the Tilak Marg PS at 2 pm on 09.03.2019 (A copy of this notice is annexed as **Annexure EE** at Page 115 to -). A video recording of us questioning the police team as to why they wanted to arrest us is annexed as **Annexure FF** at Page 137 to -). The police team took me and my husband to the police station Mukungarh, District - Jhunjhunu, Rajasthan and a copy of the daily diary recorded at 11.06 am; would show that the police team led by SI Dharmender Kumar accompanied me and my husband to PS- Tilak Marg, Delhi (A copy of Daily Diary entry of the PS: Mukungarh dated 8/9.03.2019 is Annexed as **Annexure GG** at Page 116 to 118).
72. I returned to Delhi with my husband in my brother-in-law's car [DL 8 CAR 3871]. I went to Tilak Marg PS, Delhi with my husband at around 5.30 pm on 09.03.2019. My husband, Dharam Singh informed the Delhi Police



WhatsApp number at 9910641064 about our harassment by the police team. We met the SHO Tilak Marg PS, Delhi where I and my husband were asked to sit in Duty Officer Room. After sometime, the police team led by SI Dharmender Kumar reached Tilak Marg PS and asked if we met the SHO of Tilak Marg PS. I informed SI Dharmender Kumar that it is upon his instructions I have been sitting in Duty Officer room. I was extremely unwell, and the SHO, Tilak Marg asked me and my husband to keep sitting in the Duty Officer room. Upon request made by my husband, the SHO, Tilak Marg allowed me only to go out of the police station, to meet the doctor. I went to Deen Dayal Upadhyay Hospital, Delhi with my brother-in-law. (A copy of the medical report of my visit to Deen Dayal Upadhyay Hospital dated 9.03.2019 is annexed as **Annexure HH** at Page ___ to

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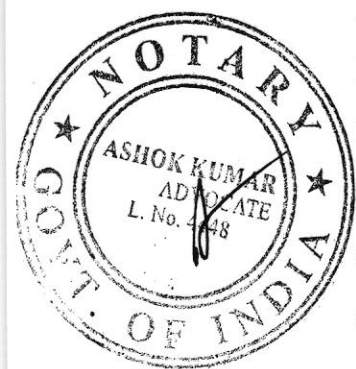
73. I submit that the said FIR is complete false and baseless and the allegations levelled against me and my husband in the said FIR are false, malicious and premeditated to harass and terrorise me and my family. The complainant in the aforesaid FIR alleges having met me in the Supreme Court premises, twice, near bank, through a middleman, Mansa Ram for getting the complainant a job in the Supreme Court, in group D post, like process server/ pyade on the pretext that I am personal assistant of the highest sahib (officer) of the supreme court and my husband holds top post in police, all of which is completely false and baseless. I say that the complainant falsely stated that he paid an advance sum of Rs. 50,000/- for the total consideration of Rs. 10,00,000/- allegedly for getting him a job. I also say that I and my husband, Dharam Singh, never threatened the complainant as alleged in the FIR. I say that the manner in which the FIR is lodged, on the basis of false allegations, without verifying veracity thereof, raises suspicion on the registration of FIR, and suspicion over the manner in which police conducted itself in the arresting me and my husband.



Around 2 am on 10.03.2019 (late night of 09.03.2019) my mother-in-law called my bhabhi, Shashibala (sister-in-law) asking her to reach House No. 101, Police Colony, Tilak Nagar where my mother-in-law and daughter were residing. We were shocked to receive call at 2 am, and immediately rushed to Police Colony, Tilak Nagar fearing danger to family members. There I saw Devender Kumar, SHO of Tilak Marg PS, in casual dress (not in police uniform) and also saw my husband, Dharam Singh handcuffed. Devender Kumar, SHO asked me and my sister-in-law to sit in the police

van and misbehaved with me and my sister-in-law, pushing us inside the van. Mine and my sister in laws legs were tied after I was pushed inside the van. (A copy of the video footage of my husband Mr. Dharam Singh being brought to our residence handcuffed is annexed as **Annexure II** at Page 137 to).

75. My husband Dharam Singh my sister-in-law and I were forcefully taken to PS Tilak Marg, through a gate (which remains locked usually) where no CCTV cameras are installed and I was shackled with handcuffs by my feet to the bench where I was made to sit. The SHO misbehaved with me and threatened of dire consequences. At around 7-8 am on 10.03.2019, the police untied me and took me again inside the Tilak Marg Police Station where CCTV cameras are installed. The SHO, Tilak Marg misbehaved with me and my sister-in-law, and upon his order I was handcuffed again inside the ladies lock up room. At around 11 am on 10.03.2019, I was taken several times to the IO room and SHO room for investigation and also subjected to medical tests at Ram Manohar Lohia Hospital, Delhi around 12 pm and thereafter, I was produced before the Metropolitan Magistrate at around 2 pm on 10.03.2019. The police asked for 3 days of police custody but the Metropolitan Magistrate allowed police custody for a day only. My mobile phone was seized by police and there is likelihood of important evidence being deleted or planted in my phone and tampered with.
76. After grant of police custody for a day on 10.03.2019; I was kept in the police station, Tilak Marg confined in a room and put inside lock-up of the Tilak Marg PS. I was produced before the Metropolitan Magistrate on 11.03.2019 and the Metropolitan Magistrate allowed for judicial custody for fourteen days, whereupon I was kept in Tihar Jail (No. 6). On 11.03.2019, I had moved a bail application before the Court of Metropolitan Magistrate, Patiala House Court. The bail application was opposed by the police and the Metropolitan Magistrate, Patiala House Court, vide an order dated 12.03.2019 granted bail. I say that on 14.03.2019 (copy attached) an application was moved before the Court of Metropolitan Magistrate, Patiala Courts, requesting to preserve CCTV footage of 09.03.2019 – 10.03.2019 and/ or to provide a copy of it. I apprehend due to influence of local police, the said application was not listed until 26.03.2019. That case and investigation pertaining to FIR no. 0021 - dated 03.03.2019 was transferred to crime branch and one Mukesh Antil was appointed as IO of the case. Recently on 11.04.2019, the IO Mukesh Antil moved an application for



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cancellation of bail granted to me. The said application is now listed for 20th of April 2019.

77. Due to my continued harassment and illegal treatment by the Police, on 27.03.2019, I sent a detailed letter to the Delhi Commission of Women and Sh. Anil Baijal, Lieutenant Governor of Delhi regarding the harassment and inhumane treatment meted out me and my family by Mr. Devender Kumar, the current SHO Tilak Marg Police Station. In these applications I did not mention the incidents of sexual harassment by the CJI, since I was very very scared as by now my life and the lives my family members had been destroyed. I only wanted the harassment and victimisation to end and did not want to further anger the CJI and invite more torture on myself and my family. The details of the harassment as given in my letter are summarized below:-

That I along with my husband and Sister in law were illegally arrested at 2 or 3 a.m. of 10.03.2019

- I along with my sister in law were pushed in the police van and then our legs were shackled using cuffs and we were taken to the police station. As the arrest was illegal, we were not taken from the front gate instead SHO took us from another gate where there was no CCTV.

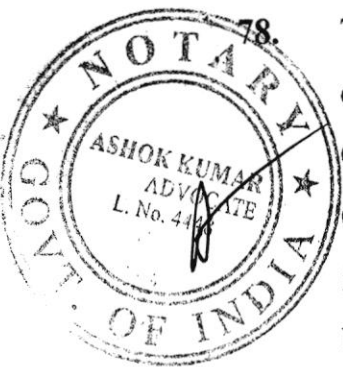
- The SHO tied my legs with a sitting bench by cuffs after reaching the police station.

- The SHO abused me by using derogatory language. The SHO also physically assaulted me by kicking me on my legs.

(A copy of the letters to the Delhi Commission of Women and the Lieutenant Governor of Delhi are annexed as **Annexure JJ** at Page 120 to 135).

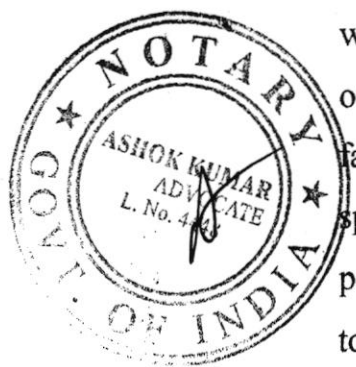
78. That my husband Dharam Singh also wrote a letter to Deputy Commissioner of Police, PMO's office, National Human Rights Commission, Special Commissioner of Police Vigilance, Special Commissioner of Police Law & Order, Chief Minister of Delhi, Ministry of Home affairs regarding the illegal arrest, harassment, handcuffing, and assault meted out to him, his brother, brothers relative and sister in law by the SHO, Tilak Marg Police Station.

79. On 9.04.2019, my husband received an order from Addl. Dy. Commissioner of Police, 2nd Bn. DAP, Delhi stating that my husband and his brother were

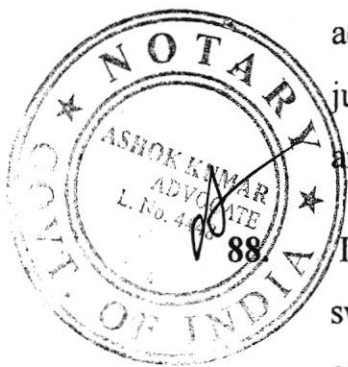


placed under suspension while he was posted at the 2nd Bn. For the same reasons as given in the order dated 29.12.2019, departmental action was being initiated against my husband and his brother. (A copy of the order dated 9.04.2019 is annexed as **Annexure KK** at Page 136 to —).

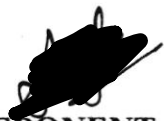
80. I say that I have done no wrong in relation to my work nor have my husband or his brothers ^done any wrong in relation to their work. I say that the charges against me that I had showed reluctance in rel^{at}ion to my work are false and wrong. I say that I had conveyed to my superior officer that my daughter had a school function that I was required to attend and would required half a days casual leave, and that I would try my best to attend work as soon as the function was over.
81. I say that the Order dated 21.12.2018 terminating me from service was passed without giving me an opportunity to be heard and present my defense and in violation of principles of natural justice.
82. I say that given my unblemished and exemplary service record the penalty of dismissal from service awarded to me is unreasonable and highly disproportionate.
83. I say that my dismissal, the suspension of my husband and my brother in law, and the dismissal of my handicapped brother in law are all part of a well planned strategy to intimidate me. The consistent persecution, beginning from my transfer from CRP till the false F.I.R that was registered against me and our imprisonment have all been done in retaliation and with vengeance after I rejected the CJI's sexual advances during the two incidents of sexual harassment on 10th and 11th October 2018, and again when in late October 2018 I rejected CJI's offer to come back to work in his Court. On 11th October 2018 when I pushed the CJI, he became aware that I would not succumb to his unwelcome sexual advances, and again when offered I refused to work closely with him. The persecution of me and my family members is to intimidate me, silence me and prevent me from speaking about the sexual harassment by the CJI. It is now evident that the persecution and torture is a well devised strategy to harass and victimise me, to ruin me and my family and cause us economic and social devastation. It is for this reason that I was repeatedly transferred, and flimsy grounds were created for my dismissal.



84. I say that I have been dismissed on false and frivolous charges, despite my ACR grading me as good and very good. Despite speaking to the employees welfare association of the Supreme Court I was informed that nobody could help me.
85. I say that my family has been devastated and rendered economically destitute by false and frivolous proceedings and complaints against them. I say that the CJI has misused his position, office and authority and abused his clout and power to influence the police to make unlawful arrests and torture me in police custody.
86. I say the unwanted sexual advances and sexual harassment of the CJI was well planned for a fairly long period of time, before it actually occurred. In hindsight I say that it is clear that the CJI took an undue interest in me and supported me professionally, as his motive was to make sexual advances me. I was confused when on 10th October he told me that he was treating me like his daughter and let it pass thinking that that a person in such a high position would not want to do anything immoral. However on the next day that is on the 11th October he made his intention to have a sexual relationship with me clear and he made physical advances as described above. At that point I clearly and directly rejected his sexual advances and made it clear that his advances were unwelcome to me. It was after this and after my repeated refusal to interact with him which appears to have angered the CJI and triggered him to unleash his wrath on me and my family.
87. I say that unknown to me at that time, it is now clear that the fact that I was posted at the CJI's residence was also planned by him so that he could have access to me in private. It is also clear why the CJI for the first time chose a junior court assistant for being posted at his residence rather than a seasoned and experienced senior court master or court assistant or steno.
88. I say that it is also clear to me now why he invited my husband to the swearing in ceremony, to create a cover for himself that he had no motive other than the welfare of me and my family.
89. It is also clear to me now that the CJI used his discretionary quota to appoint my disabled brother in law which he then used to ask me what I could do for him in exchange and that he expected sexual favours in return from me.



90. I have been victimised for resisting and refusing the unwanted sexual advances of the CJI and my entire family has also been victimised and harassed due to that.
91. I have filed complaints to the DCW and NHRC in this regard. Even until that point I avoided talking about the sexual harassment, as I was very very scared and I did not want to anger the CJI further and invite any more harm to me and my family. However, it now seems like the harassment, victimisation and torture will not stop unless I speak out about the origin and motive for the harassment. Further, I knew that since he was such a powerful man, nobody would believe my experience, and would only believe that the CJI could never do something like this.
92. It is only when the victimisation has reached unbearable proportions, when me and my family were taken into police custody and tortured, and now there is an imminent danger to my life that I am compelled to speak the whole truth, in order to save myself and my family.


 DEPONENT

VERIFICATION

I, the above named Deponent, do hereby solemnly verify that the contents of the affidavit from paras 1 to 93 are believed to be true and correct to the best of my knowledge and belief, no part of it is false, and nothing material has been concealed there from.

18 APR 2019

Verified at New Delhi on this 18th of April, 2019

 DEPONENT

Identify the Executant Deponent
Who Has Signed in My Presence



ATTESTED


 NOTARY PUBLIC
 DELHI (INDIA)

18 APR 2019