

From,

16.08.2025

1. Mathews J. Nedumpara  
Advocate,  
101, 1<sup>st</sup> Floor, Gundecha Chamber,  
Nagindas Road, Fort, Mumbai,  
Maharashtra – 400 001.
2. Dr. Chittoor Rajmannar  
Advocate,  
KHCAA Chamber 557,  
High Court of Kerala Campus,  
Kochi – 682 031
3. Rohini Amin,  
Advocate,  
B-705, Nirman Apartments, R.J.  
Marg, Pump House, Andheri East,  
Mumbai, Maharashtra - 400 093.
4. Hemali Kurne,  
Advocate  
101, 1<sup>st</sup> Floor, Gundecha Chamber  
Nagindas Road, Fort, Mumbai,  
Maharashtra – 400 001.
5. Roy Pallikkodam  
Advocate  
Chamber no. 106, KHCAA, Golden  
Jubilee Chamber Complex, Near  
High Court, Ernakulam.
6. Manisha Nimesh Mehta  
Chartered Accountant,  
President of MSME Association  
1905, Rosella, Pant Nagar,  
Ghatkopar, Mumbai,  
Maharashtra – 400 075.

To,

1. The Station House Officer  
Tughlak Road Police Station  
Aurangzeb Road,  
New Delhi - 110 011.
2. The Commissioner of Police,  
New Delhi  
Delhi Police Hdqrs. (New Building)  
Behind Parliament Street Police  
Station, New Delhi – 110 001.  
[splcp.vig@delhipolice.gov.in](mailto:splcp.vig@delhipolice.gov.in)
3. The Union Home Secretary,  
Government of India, New Delhi  
Ministry of Home Affairs, Central  
Secretariat, North Block,  
New Delhi – 110 001.  
[jscpg-mha@nic.in](mailto:jscpg-mha@nic.in)
4. The Director, Enforcement  
Directorate, New Delhi  
Head Quarters, Investigation Unit  
Room No.401, B-Wing, Parvatan  
Bhawan, Dr. A.P.J. Abdul Kalam  
Road  
New Delhi - 110 001.  
[ed-del-rev@nic.in](mailto:ed-del-rev@nic.in)
5. The Commissioner of Income Tax,  
New Delhi  
E-2 Block, Dr. Shyam Prasad  
Mukherjee Civic Centre,  
New Delhi-110002  
[delhi.cit.co.admin@incometax.gov.in](mailto:delhi.cit.co.admin@incometax.gov.in)

6. The Chairman, Central Board of Direct Taxes  
Deptt. Of Revenue, Ministry of Finance, North Block,  
New Delhi – 110 002.  
chairmancbdt@nic.in
7. The Director, Central Bureau of Investigation, New Delhi  
Plot 5-B, C.G.O. Complex, Lodhi Road, New Delhi – 110 003.  
dchi@cbi.gov.in

**Subject: Complaint for registration of FIR and investigation into offences of corruption, bribery, money laundering, criminal conspiracy, and related crimes committed by Justice Yashwant Varma, bribe-givers, fixers, and others.**

Respected Sir(s),

We, the undersigned complainants, are lawyers and citizens aggrieved by the inaction of the authorities in setting the criminal law into motion despite clear disclosure of serious cognizable offences. The failure to act is solely because the accused happens to be a sitting High Court Judge, which is a gross violation of the principle that no one is above the law.

We are filing this complaint to demand immediate registration of a First Information Report (FIR) and commencement of investigation into grave cognizable offences under the Indian Penal Code, the Prevention of Corruption

Act, 1988, the Prevention of Money Laundering Act, 2002, the Income Tax Act, 1961, and other applicable laws, committed by Justice Yashwant Varma in collusion with bribe-givers, fixers, brokers, and other accomplices.

## **1. Police as first responders — dereliction of statutory duty**

On the date of the incident, 14-03-2025, an accidental fire at the premises of Justice Yashwant Varma, exposed large quantities of unaccounted cash, both burnt and unburnt. The police were the first persons to arrive at the scene of the crime and thereby obtained direct, personal knowledge of the commission of multiple cognizable offences.

Despite this, no FIR was registered, no scene-of-crime measures were undertaken, the cash was neither seized nor documented, and no forensic or financial tracing was initiated. This failure to act amounts to willful dereliction of duty under Section 154 CrPC and abetment of the crimes by shielding the offenders.

## **2. Findings of the Supreme Court-appointed Committee**

Following the incident, the Hon'ble Chief Justice of India constituted a Committee to enquire into the matter.

The Committee: Recorded evidence from 15 officers and employees associated with Justice Varma and the Delhi High Court;

- Examined statements of 15 police officials and 4 CRPF constables who were on duty or present at the scene;
- Examined statements of fire personnel who responded to the blaze;

- Analysed documentary and circumstantial evidence relating to the source and destruction of the money.

The Committee concluded that Justice Yashwant Varma had no valid explanation for the possession of such large amounts of unaccounted cash and was involved in the destruction of the currency. This is direct proof of offences under the Prevention of Corruption Act, Prevention of Money Laundering Act, and offences attracting action by the Income Tax Department. The Committee's report is enclosed as Annexure–A for your immediate reference.

### **3. Offences under PCA, PMLA, IPC, and Income Tax Act**

The possession and destruction of unaccounted cash, coupled with the absence of any lawful source, constitute criminal misconduct under Sections 7, 8, 9, 10, and 13 of the Prevention of Corruption Act, 1988, read with relevant provisions of the IPC.

The acts of concealing, possessing, and destroying proceeds of crime also attract Sections 3 and 4 of the Prevention of Money Laundering Act, 2002. In addition, the facts disclose clear offences under the Income Tax Act, 1961 relating to tax evasion, undisclosed income, and failure to explain the source of funds under Section 69A and other relevant provisions.

### **4. Taxation and commercial cases — pattern of judicial favouritism**

At the time of the incident, Justice Yashwant Varma was presiding over sensitive taxation and commercial matters in the Delhi High Court. There

are credible allegations, supported by circumstantial and testimonial evidence, that he extended undue favours to powerful corporate entities and high-net-worth individuals in exchange for illegal gratification.

Given the nature of cases he was handling, the Income Tax Department, the Enforcement Directorate, and the Central Bureau of Investigation have a direct stake in the matter, as the proceeds of the alleged bribery likely originated from tax evasion, fraudulent accounting, and other commercial malpractices.

## **5. Representations to Constitutional Authorities**

Prior to this complaint, detailed written representations on the matter were submitted to:

- i. The Hon'ble President of India
- ii. The Hon'ble Vice President of India
- iii. The Hon'ble Prime Minister of India
- iv. The Hon'ble Union Home Minister (in charge of the Delhi Police)
- v. The Hon'ble Union Law Minister
- vi. The Hon'ble Minister for Parliamentary Affairs

However, no criminal investigation has been initiated, despite the seriousness of the offences and the involvement of multiple central agencies' jurisdictions.

## **6. Mandatory nature of FIR registration**

It is settled law, as held by the Constitution Bench of the Hon'ble Supreme Court in *Lalita Kumari v. Government of Uttar Pradesh* (2014) 2 SCC 1, that the police must register an FIR when information discloses a cognizable offence. There is no discretion in the matter, and any failure to do so constitutes a breach of statutory duty and violation of Article 14 of the Constitution.

## **8. Prayer for action**

In view of the above, we request that:

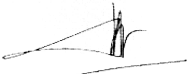

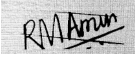

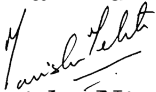

- a. An FIR be immediately registered against Justice Yashwant Varma, under the relevant provisions of the IPC, the Prevention of Corruption Act, the Prevention of Money Laundering Act, the Income Tax Act, and other applicable laws;
- b. All physical and electronic evidence be secured and recovered, including CCTV footage, call records, financial documents, and forensic materials from the scene of the fire;
- c. The role of all co-conspirators be investigated, including bribe-givers, fixers, and brokers, and the specific cases in which judicial favours were exchanged for illegal gratification be identified;
- d. Joint investigation be undertaken in coordination with the Income Tax Department, Enforcement Directorate, and CBI for a comprehensive probe;
- e. An Action Taken Report be submitted to us within the time prescribed by law.

Your continued inaction will amount to abetment of the offences and deliberate violation of statutory and constitutional mandates. We are ready to extend full cooperation and provide any further material in our possession.

**Enclosure:**

**Annexure-A:** Copy of Committee's report dated 03-05-2025, indicting Justice Yashwant Varma

**Names & Signatures:**

-   
1) Mathews J. Nedumpara
-   
2) Dr. Chittoor Rajmannar
-   
3) Rohini Amin
-   
4) Hemali Kurne
-   
5) Manisha Nimesh Mehta
-   
6) Roy Pallikkodam