

**BEFORE THE NATIONAL GREEN TRIBUNAL, (SZ), SITTING AT  
CHENNAI**

(Under Section 18(1) read with Sec. 14 & 15 of National Green Tribunal  
Act, 2010)

**Original Application No. 53 OF 2022 (SZ)**

**BETWEEN**

**D. HemaKumar**

No. 1-63, Karani Village,  
Nagalapuram, Chittoor district,  
Andhra Pradesh 517 589  
9884422695, taurs@gmail.com

**.. APPLICANT**

- - AND -

**1. Union of India, Rep. by Secretary**

Ministry of Environment, Forests & Climate Change,  
3rd Floor, Prithvi Wing, Indira Parvayaran Bhawan  
Jor Bagh, New Delhi-110003  
Phone. No. +91 11 24695262, 24695265, 24695132  
Email- [secy-moef@nic.in](mailto:secy-moef@nic.in)

**2. The State of Andhra Pradesh**

Rep. by Principal Secretary for Mines and Geology, Secretariat,  
D No. 7-104, B-Block, 5th and 6th Floor, Ibrahimpatnam,  
Vijayawada, AP- 521456.  
Phone. No. 0866-2882170, Email- [admin@apmines.gov.in](mailto:admin@apmines.gov.in).

**3. The District Collector Chittoor,**

New Collectorate Office of Chittoor,  
Chittoor District.  
Phone. No. 9491077001, 08572240333,  
Email- [collectorchittoor@gmail.com](mailto:collectorchittoor@gmail.com)

**4. The Assistant Director of Mines and Geology,  
Chittoor Jurisdiction.**

2-53 & 54, Officers Lane,  
Kongareddy Pally, Chittoor - 517001.  
Phone. No. 08572-233994, Email- [admngctr-ap@gov.in](mailto:admngctr-ap@gov.in).

**5. The Chairman**

**Andhra Pradesh Pollution Control Board**

*D. HemaKumar*

D.No. 33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre,  
Chalamalavari Street, Kasturibaipet,  
Vijayawada - 520 010.  
Phone. No. 0866-2463202, Email- [chairman@appcb.gov.in](mailto:chairman@appcb.gov.in)

- 6. State Environment Impact Assessment Authority (SEIAA)**  
Door No. 33-26-14 D/2, Near Sun Rise Hospital,  
Pushpa Hotel Centre, Chalamavari Street,  
Kasturibaipet, Vijayawada- 520 010.  
Email- [udayapampana@gmail.com](mailto:udayapampana@gmail.com)

- 7. The Andhra Pradesh Mineral Development Corporation Limited,**  
Rep. by its Executive Director  
No. 294/1D, Tadigadapa to Enikepadu 100 ft. Road,  
Kanuru Village, Penamaluru Mandal,  
Vijayawada - 521137  
Phone. No. 0866 2429999,  
Email- [apmdcltd@yahoo.com](mailto:apmdcltd@yahoo.com)

- 8. PMR Infra India Limited, Rep. by its Chairman**  
Flat No. 706, MVV Royal Palace,  
D.No. 1018, Visakhapatnam, Andhra Pradesh- 530003.  
Phone. No- Not known, Email- [pmrofficevskp@gmail.com](mailto:pmrofficevskp@gmail.com)

- 9. Jain Prakash Power Venture Limited,**  
Rep. by. its Managing Director,  
H. No. 40-14-7, Second Floor, Chandra Moulipuram,  
Benz Circle, Vijayawada, Andhra Pradesh- 530 003.

Mob- Unknown  
Email- Unknown

...RESPONDENTS

#### AFFIDAVIT FILED BY THE APPLICANT

I, D. Hema Kumar, Son of D. Damodaram, aged about 31, residing at  
No. 1-63, Karani Village, Nagalapuram, Chittoor district, Andhra Pradesh  
517 589., do solemnly affirm and sincerely state as follows;



1. It is submitted that the above Application had been filed praying for:

- a. *"To declare the Respondents 8 and 9 as violators, to the Environmental Clearance conditions,*
- b. *To direct the Respondent Authorities, to take immediate measures to assess the damages that has been caused, on account of the illegal quarrying operation being carried out by the Respondents 7-9, and to pass necessary orders under Sec.5 of the Environment (Protection) Act, 1986 to recover the same from the concerned officials responsible, and prosecute them in accordance with the law.*
- c. *To Direct the Respondent Authorities to initiate criminal prosecution against the concerned officers responsible for violations of the provisions of the environmental legislation;*
- d. *To Direct the Respondent Authorities to remediate the impugned area;*
- e. *Pass such further or other orders as this Hon'ble Tribunal may deem fit and necessary in the interest of justice."*

2. When the matter came up for admission, the Hon'ble Tribunal was pleased to pass the following directions:

*".....4. In such circumstances, we feel that it would be detrimental if project proponents are allowed to mine with the help of the heavy machines. So, we deem it appropriate to direct the District Collector, Chittoor District to make spot inspection within two days and file a report adverting to the allegations made in the application.*

*5. In the event District Collector finds that the allegations made by the applicant are true, it is open to him to pass appropriate orders including stopping project proponents to do mining....."*

3. On 14.05.2022, in compliance to the Tribunal's direction, the District Collector, Chittoor District, was pleased to inspect the impugned site, where illegal mining using heavy machineries were being done by

*D. H. R.*

Respondents 8 and 9. Anticipating that the heavy machineries would be removed this Applicant had taken photographs and had attached the same as annexures to the present affidavit. The said photographs were shot on 12.05.2022, at about 3 PM.

4. It is submitted that, on information to the Respondents 8 and 9 about this Hon'ble Tribunal's order, the heavy machineries were used to flatten and fill the deep pits, which were illegally mined using the machineries in the impugned river. The said work was done in a war foot basis and immediately on 14.05.2022 (morning), about 10 proclainers were moved from the river. Few proclainers were moved on one side of the river and few proclainers were taken to the state border, which is approximately 4 km from the impugned site.
5. When the District Collector inspected the site at about 12.30 PM, on 14.05.2022, there was no heavy machineries found in the impugned site. The said fact clearly shows that the Respondents 8 and 9 do not have permission to use the heavy machineries and had been illegally using it to do illegal mining in the area. The satellite image, if taken, can show the Respondents 8 and 9 have been illegally mining using heavy machineries. It is submitted that the villagers made oral submissions to the District Collector on the sudden disappearance of the heavy machineries. Also photographs of the machineries being used, a day before the said inspection was also shown to the District



Collector, but the Collector refused to accept the same as no machineries were found at the time of inspection.

6. Hence, it is respectfully prayed that this Hon'ble Tribunal may be pleased to allow the interim prayer in the above Original Application and pass such further or other orders as deem fit and does render justice.

Solemnly affirmed on this the  
18th day of May, 2022 :  
And signed his name in my presence.

  
[Applicant]

: BEFORE ME

:  [N. Bhargava]  
(ADVOCATE : )

AP: 2445/2016

**BEFORE THE NATIONAL GREEN  
TRIBUNAL, (SZ), SITTING AT  
CHENNAI**

**(Under Section 18(1) read  
with Sec. 14 & 15 of National  
Green Tribunal Act, 2010)**

**Original Application No. 53  
OF 2022 (SZ)**

**AFFIDAVIT OF THE APPLICANT**

**COUNSEL FOR THE APPLICANT**

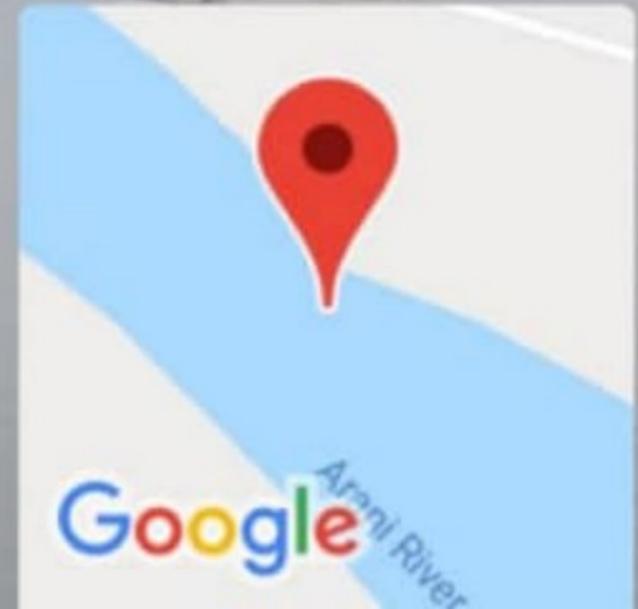
**MS. KAMALESH KANNAN**

**9884422695**

**taaurs@gmail.com**



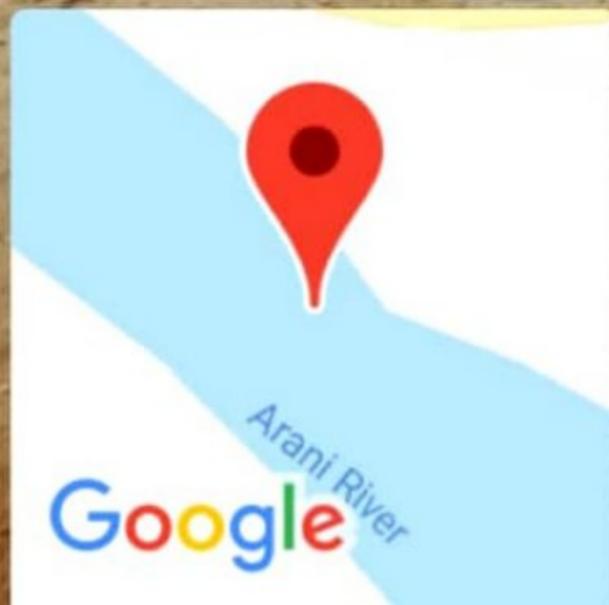
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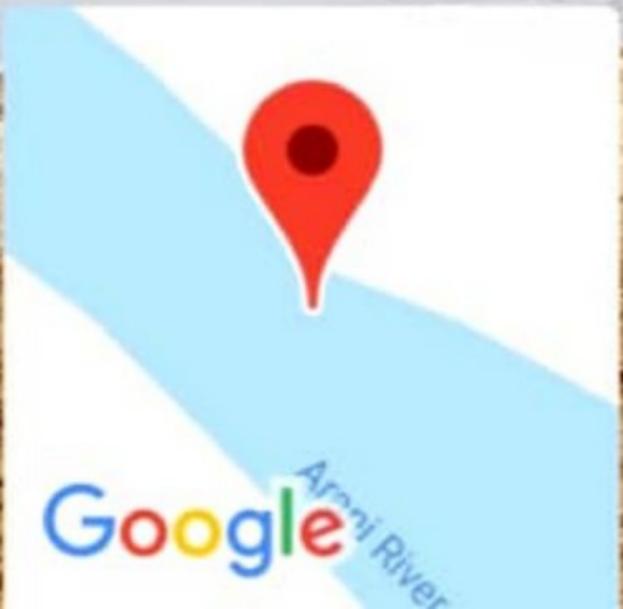


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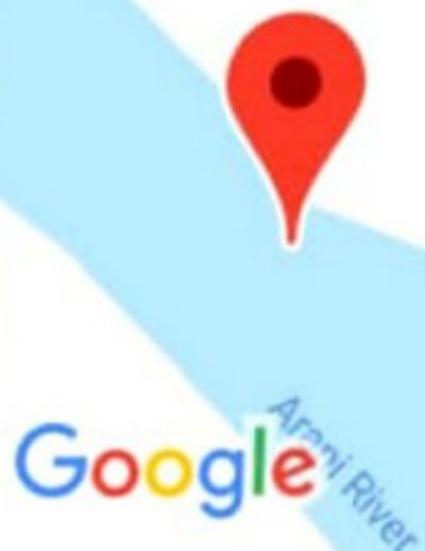
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 GPS Map Camera



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GPS Map Camera



Arani River

Google

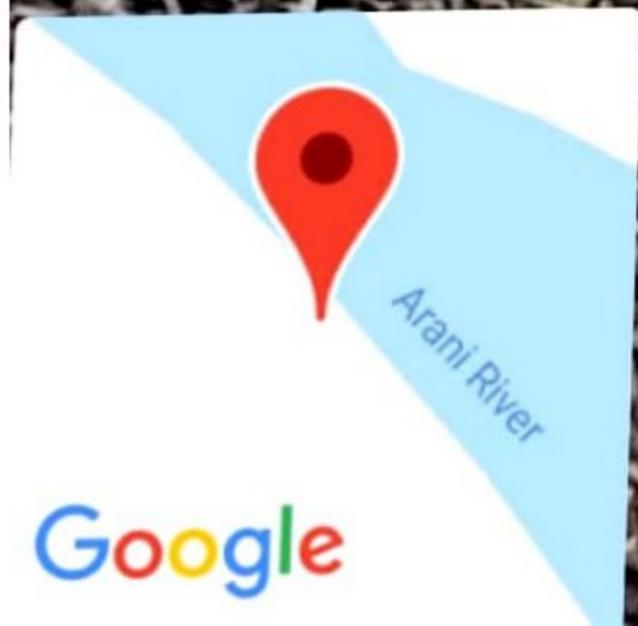
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**Andhra Pradesh 517589, India**

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 GPS Map Camera



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GPS Map Camera



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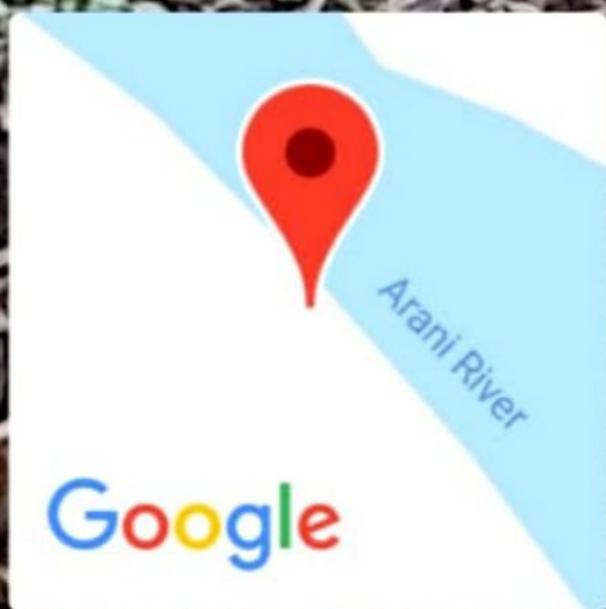
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**Andhra Pradesh 517589, India**

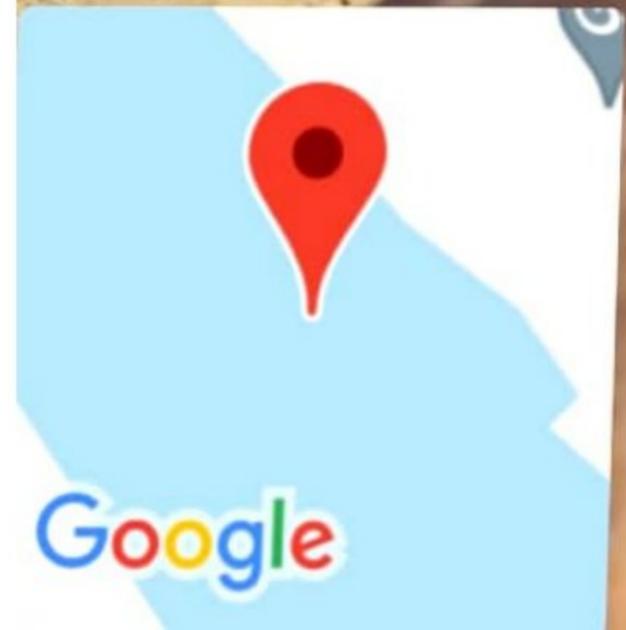
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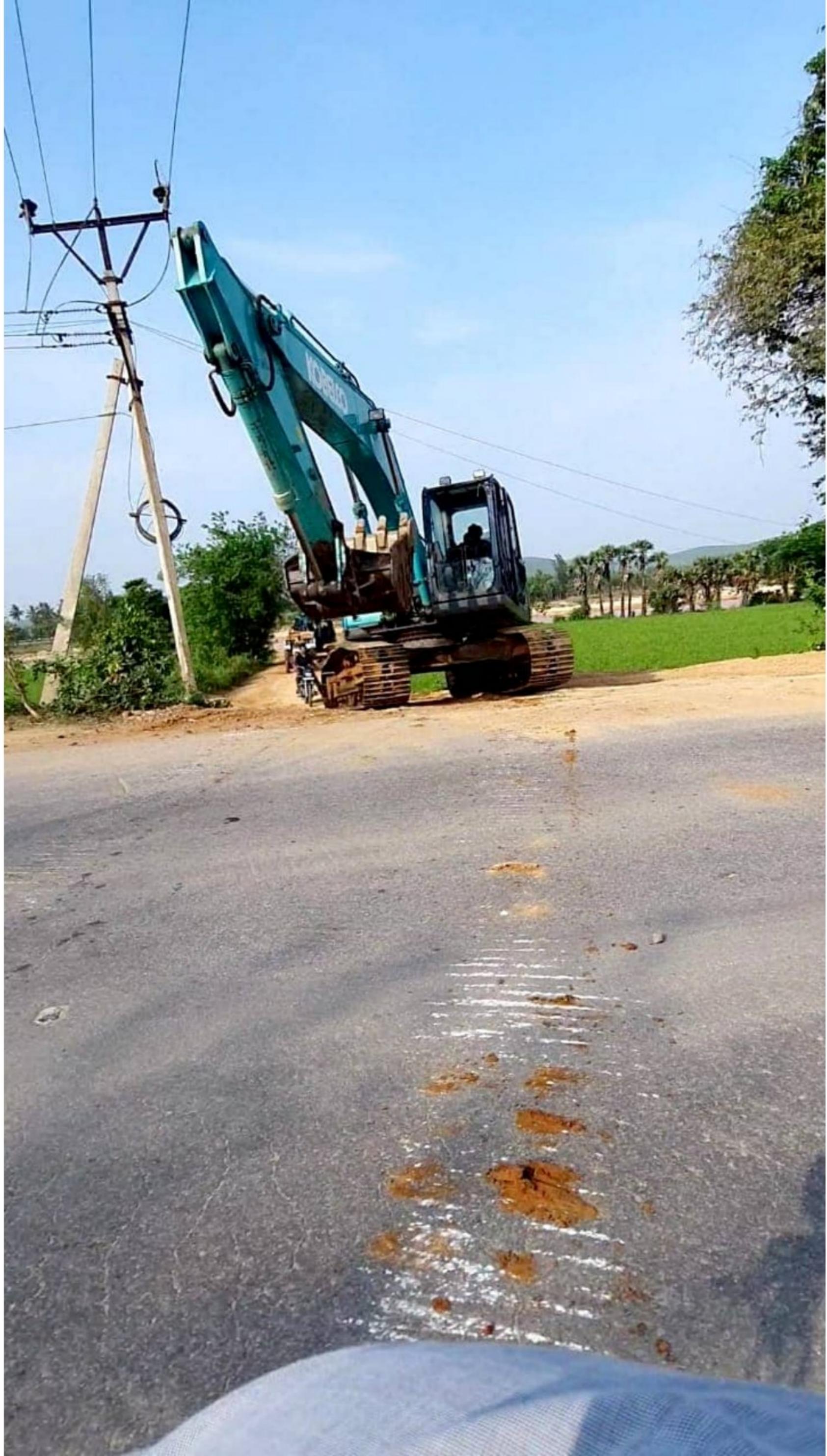


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మంచి పాఠ్యాంశాల ముద్రణ

THE LARGEST CIRC

రాజధాని చదువు



మంచి బడుపుల  
మార్గములు

**ఈనె**  
THE LARGEST CIRC

**రాజద్రోహ చట్ట**



మంచి చదువుల మార్గమిది

తెలుగు 12-5-2022 గురువారం ఏలే పంపురి 48 . పంపురి 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nellore

**తెలుగు**

THE LARGEST CIRC

**రాజదోహ చరిత్ర**



మంచి చదువుల  
మార్గమిది

**ఈనె**  
THE LARGEST CIRC

తెలంగాణ రాష్ట్రం, విజయవాడ, ఆంధ్రప్రదేశ్, కర్నూలు, రాజమహేంద్రవరం, గుంటూరు, ఢిల్లీ, న్యూఢిల్లీ, బెంగళూరు, చెన్నై, మద్రాసు, హైదరాబాద్, విశాఖపట్నం, విజయవాడ, ఆంధ్రప్రదేశ్, కర్నూలు, రాజమహేంద్రవరం, గుంటూరు, ఢిల్లీ, న్యూఢిల్లీ, బెంగళూరు, చెన్నై, మద్రాసు

# రాజద్రోహ చట్ట

- సెక్షన్ 124-a కింద కొత్త కేసులు నమోదు చేయబడ్డాయి
- ఇప్పటికే రాజద్రోహ ఎవరైనా చర్యలు తీసుకోవడం
- ఎటువంటి కేసు, కేసులు నమోదు చేయబడ్డాయి





మంచి చదువుల మార్గమిది

**Sanku**  
చదవండి

తీరుపతి 12-5-2022 గురువారం సబ్బో పంపుటి 48 . సంక 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nel

# ఈనె

THE LARGEST CIRC

## రాజధోహ చట్ట



మంచి చదువుల మార్గమిది

తరువరి 12-5-2022 గురువారం సెటి సంపుటి 48 సంఖ్య 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nel...

# ఈనాడు

THE LARGEST CIRC...

## రాజద్రోహ చట్టం

- సెక్షన్ 124ఎ కింద కొత్త కేసులు నమోదు చేయొద్దు
- ఇప్పటికే దాఖలైన ఎఫ్ఐఆర్లపై చర్యలు తీసుకోవద్దు
- లరెన్సె లైట్లలో ఉన్న వాళ్లు న్యాయస్థానాల ద్వారా ఉపశమనం పొందవచ్చు

అత్యు...  
దేశ సర్వస్వ...  
ఈ సెక్షన్లపై...  
విచక్షణారహితంగా





**తేజస్**  
THE LARGEST CIRCULATION

**రాజధాని చట్టం**

- కృష్ణా నది ఒడ్డున కొత్త రాజధాని నగరం
- అక్షయి నది ఒడ్డున కొత్త రాజధాని నగరం
- కొత్త రాజధాని నగరం
- కొత్త రాజధాని నగరం
- కొత్త రాజధాని నగరం
- కొత్త రాజధాని నగరం

**తీరం దాటిన అసని**

• అసని నది ఒడ్డున కొత్త రాజధాని నగరం



మంచి చదువుల మార్గమిది

**ఈనాడు**

THE LARGEST CIRCULATION

తీరుపతి 12-5-2022 గురువారం పేజీ నంబరు 48 . పంపిక 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Anantapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nellore

# రాజద్రోహ చట్టం



- సెక్షన్ 124a కింద కొత్త కేసులు నమోదు చేయొద్దు
- నాన్ బీకే రాజలైన ఎన్ఐఆర్లపై చర్యలు తీసుకోవద్దు
- లక్ష్మణ్ కేసులో ఉన్న వాళ్లు న్యాయస్థానాల ద్వారా ఉపశమనం పొందవచ్చు

కార్యకర్తల పక్షాధిపత్యం వల్ల పరిస్థితులు మారినట్లు తెలుస్తోంది. ఇది ప్రజలకు తెలియజేయాలి.



మంచి చదువుల  
మార్గమిది



ఈనె  
చదువు

తిరుపతి 12-5-2022 గురువారం పేజీ పంపుటి 48 . సం. 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nellore

**ఈనె**

THE LARGEST CIRCULATION

**రాజద్రోహ చట్టం**



మంచి చదువుల మార్గమిది

సంకల్పం

**ఈనె**

THE LARGEST CIRC

తీరుపతి 12-5-2022 గురువారం సెటి వంపుటి 48 . సంచిక 272

Tirupati, Hyderabad, Visakhapatnam, Vijayawada Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nellore

**రాజద్రోహ చట్టం**



 GPS Map Camera



**Dasukuppam, Andhra Pradesh, India**  
**8VMH+Q22, Dasukuppam, Andhra Pradesh 517588, India**  
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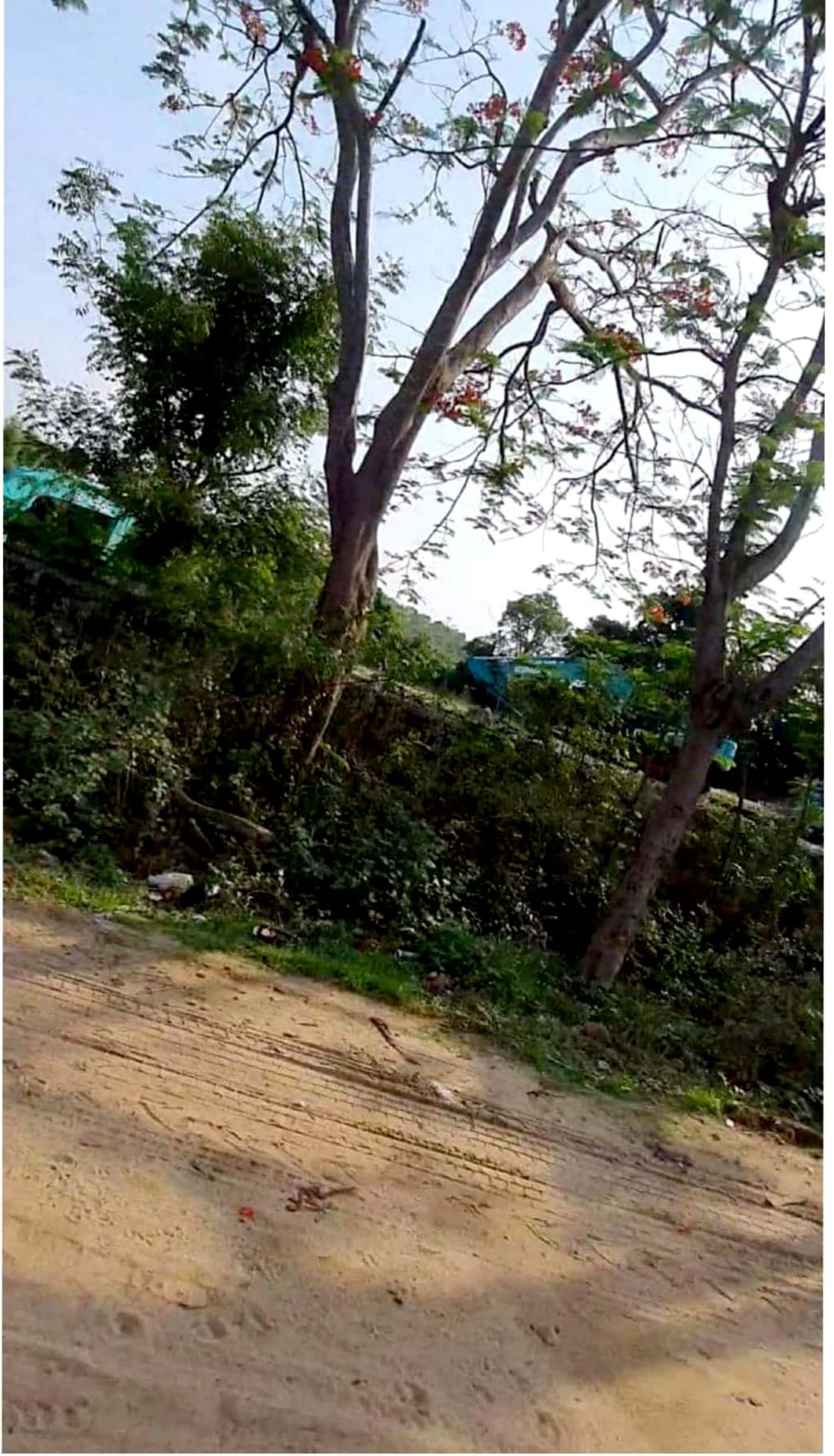


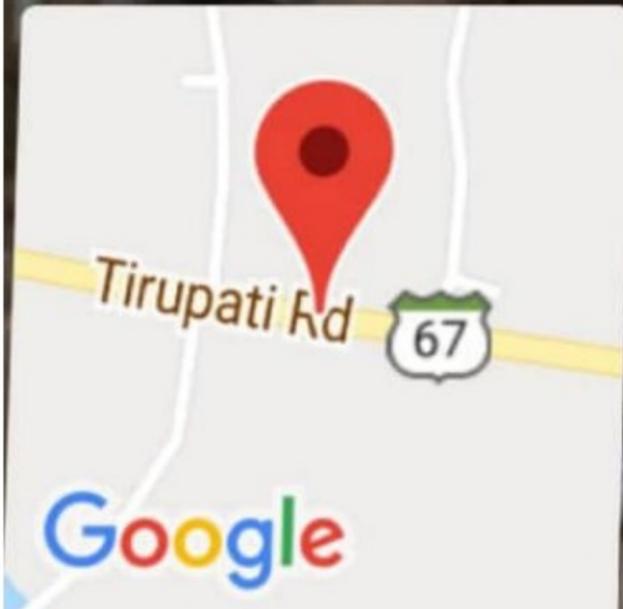
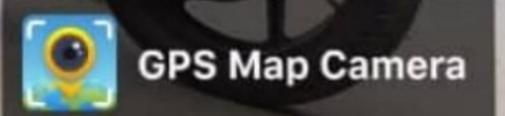
GPS Map Camera



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**Dasukuppam, Andhra Pradesh, India**  
**8VMH+Q22, Dasukuppam, Andhra Pradesh 517588, India**  
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**Long 79.877656°**  
**14/05/22 09:20 AM**



మంచి చదువుల మార్గమిది

తేజ్

**తేజ్**

THE LARGEST CIRCULATION

తిరుపతి 12-5-2022 గురువారం పేజీ సంపుటి 48 . సంచిక 772

Tirupati, Hyderabad, Visakhapatnam, Vijayawada, Ananthapuramu, Karimnagar, Rajamahendravaram, Suryapet, Guntur, Nellore

**రాజద్రోహ చట్టం**