

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

E.A. NO. 24 OF 2022

IN

O.A. NO. 60/2022

IN THE MATTER OF: -

ALKA JAIN

...APPLICANT

VERSUS

NORTH DELHI MUNICIPAL CORPORATION & OTHERS

...RESPONDENTS

DATE OF HEARING: 16/01/2023

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APPLICANT

DELHI

DATED-12/01/2023

(1)

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**FURTHER WRITTEN SUBMISSION BY THE APPLICANT, ALKA
JAIN**

Most respectfully submitted that: -

1. That report of DM & MCD are misleading and one sided as both are stating and filing photographs of different place i.e., Teacher Lane, while our complaint is of **CEMENTED ROAD**, Anand Parbat.

It is pertinent to mention here that DPCC found 2 persons for dumping building material on CEMENTED ROAD namely Mohan Singh and Prem.

Where is the statement of Prem?

Why statement of Prem not recorded?

2. **FALSE SUBMISSION IN JOINT SURVEY REPORT DATED 29/12/2022: -**

Officials/joint team stated that they tried to take statement of Applicant Alka Jain whose house is in front of Mohan Singh's house but her house was locked.

OUR SUBMISSION: - Officials/joint team knows very well that Address of applicant mentioned in the MEMO OF PARTIES is located in East Delhi, but intentionally they did not contact the applicant, and tried to



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mislead this Hon'ble Tribunal. Applicant already submitted that due to life threat the applicant along with her family has been residing in East Delhi since past 3 years. Every authority knows this fact, but still saying that her house was locked.

3. That Mohan Singh said: -

a. He purchased the house (GROUNG + 3) 12 years ago as it is.

OUR SUBMISSION: - Applicant filed photograph before this Tribunal of the year 2016 in which no such house (GROUNG + 3) was there.

b. He stated that Applicant & her Son Vaibhav engaged in illegal demands of money from the people. And filed false cases to fulfill the same. Both are engaged in illegal demands of money.

OUR SUBMISSION: - The statement is highly defamatory and false and hence he shall be punished by this Hon'ble tribunal for making false and wrong statement given by him intentionally.

c. He further stated that he is a property dealer and left the business of building material in 2019.

OUR SUBMISSION: - Applicant filed the ITR/income computation of the assessment year 2022-23 in which Mohan Singh admitted that he is engaged in the business of WHOLESALE-RETAIL TRADE OF CONSTRUCTION MATERIAL.

Therefore, just to save himself Mohan Singh misguided this Hon'ble Tribunal and must be liable for strict punishment under the relevant provisions of law.

4. Why all authorities concealed the fact from this Tribunal, that Hon'ble High court has recently ordered for unauthorized construction at CEMENTED ROAD. Copy of order is already filed by the applicant.

Hence, applicant with folded hands seeks justice from this Hon'ble court by taking action u/s 26 & 28 of NGT Act, 2010.

DELHI

DATE 12/01/2023



APPLICANT
(ALKA JAIN)

PHOTO OF 2016

House
No:-
420/6
TEACHER
LANE

