

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE AT
CHENNAI**

Original Application No.33 of 2025 (SZ)

IN THE MATTER OF:

Devuru Rajesh Reddy,
Andhra Pradesh.

...Applicant

Vs

State of Andhra Pradesh
Dept. of Environment, Forests, Science & Technology,
Rep. by its Secretary, Vijayawada and Ors.

...Respondents

COUNTER AFFIDAVIT FILED BY THE 5TH RESPONDENT

I, Kamireddy Satyanarayana Reddy S/o Sundararami Reddy, aged above 67 years, residing at 1-117, Main Road inside Chillakuru Village, Jeelapaturu Post, Chillakur, Nellore, AP – 524129, do hereby solemnly affirm and sincerely states as follows:

1. I am the 5th Respondent in the above application and as such I am well acquainted with the facts and circumstances of the cases.
2. It is submitted that that the present Application, under Section 14 of the National Green Tribunal Act, 2010, had been registered based on a letter petition sent by one Mr. Devuru Rajesh Reddy, Chillakuru Village raising grievance regarding illegal excavation of soil from Swarnamukhi River bund.

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3. It is submitted that based on the said letter petition from Mr. Devuru Rajesh Reddy, the Hon'ble Principal Bench of National Green Tribunal registered the Original Application in OA 1351 of 2024, vide order dt. 4.12.2024. Following which, by order dt 20.12.2024, the Hon'ble National Green Tribunal directed the registry to list the matter before the Southern Zone Bench of this Tribunal at Chennai on 28.02.2025 and accordingly the case was transferred to this Hon'ble Bench of Hon'ble National Green Tribunal.

FACTS IN BRIEF:

4. It is submitted that there is a personal rivalry between the complainant one Mr. Rakesh Reddy and the present respondent Satyanarayana Reddy. Rakesh Reddy is an active supporter and village politician of the TDP Party. This respondent Mr. Satyanarayana Reddy is a ex-Central Bank Chairman at Nellore and also State General Secretary of YSR Party, he is an active politician with high reputation. Therefore, there is lot of effort taken to defame and malign this respondent by the Political rivals. However, the said Rakesh Reddy is apprehended to be sponsored by political rivals to set up a false case against this respondent in order to damage his reputation and political image. In fact, as soon as there was a change in government there were 8 false cases filed consequently against this respondent and the present complaint is nothing but political vendetta. Therefore, the whole

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Proceedings are motivated, and the complainant has approached with unclean hands before this Hon'ble Court.

5. It is submitted that on 28.02.2024, there was allegedly theft of sand from the flood bank of Swarnamukhi River for a distance of 350 meters and a height of 2 meter and there was also illegal transportation of sand.
6. It is pertinent to mention that this Respondent has nothing to do with the above act. This respondent has no EC, mining lease or any permissions with regard to quarry activities. This respondent further is an agriculturalist and in active political life. This respondent belongs to Chillakur village and the alleged illegal sand mining is at Swarnamukhi river bed which is at about 1.5 Kms from this respondent residence.
7. The respondent submits that he did not involve in the above act and there is no necessity to do so as well. The 5th Respondent is a respected citizen with high reputation. Further, this respondent does not have any land in S.No. 284/4. His relative one Mr. Venugopal Reddy is the owner of the land on 284/4 which is near to the river bed. Merely because the land belongs to Venugopal Reddy, an allegation is thrown that this respondent helped his relative to fill sand which not true, it is a convenient theory and harassment.



8. It is further submitted that without identifying the actual illegal person the complaint is filed because the land of the relative of this respondent is nearby to the occurrence of the sand mining and is also sought to be made a scapegoat by the official respondents as well.
9. Based on the illegal excavation of sand, already FIR is registered on the complaint of the irrigation dept. The FIR also doesn't make any prima facie case of transportation or any usage of sand by this respondent. The joint inspection by the govt authority also does not show in any manner of any involvement of this respondent. Therefore, it is completely foisted case as against this respondent.
10. This respondent is a reputed politician working for the welfare of the people, holding various post in service for the public and willing and ready to help the people and government officials for environment protection including even the remediation of the river mouth which has been allegedly destroyed by some unknown criminals.
11. It is pertinent to mention that the 5th Respondent did not involve in sand theft near the flood bank. Since the 5th Respondent's relative holding land, which is situated nearby, since the investigation couldn't find the sand mafia, the complaint has been made against the 5th Respondent also for political rivalry reasons.

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In the above said circumstances, in the interest of Justice, it is therefore prayed that this Hon'ble National Green Tribunal may be pleased to dismiss the application as against this Respondent and render justice.

Solemnly affirmed on this
11th day of December 2025 and
Name in my presence

K. S. S. S.

BEFORE ME

D. Aravind
(MS. 317/2003)

Advocate: Chennai

*(104) Law Chamber
Madras High
Court)*

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Counsel For the 5th Respondent

Sai Sathya Jith M/s. (1442/2011)