

BEFORE THE NATIONAL GREEN TRIBUNAL AT DELHI

INDEX

IN

SUPPLEMENTARY AFFIDAVIT

IN

ORIGINAL APPLICATION NO. 215 OF 2024

[Under Section 18(1) read with Sections 14, 15, 16 & 17 of the National Green
Tribunal Act, 2010]

DISTRICT & STATE : PRAYAGRAJ, UTTAR PRADESH

Ankit Tiwari

.....Applicant

Versus

ISKCON Prayagraj and others

.....Respondents

S.No.	Particulars	Date	Ann	Pg. No.
1.	Affidavit			2-4
2.	ID Proof			4A
3.	Copy of the letter by the Zonal Officer PDA	28.03.2024	SA1	5-6
4.	Copy of the photographs showing the ongoing construction at the plot in question	09.03.2024	SA2	7-10
5.	Copy of the brochure published by respondent 1		SA3	11-17

Dated: 03.12.2024



Ankit Tiwari
Applicant
(In-Person)

Res:- 35/10, Jawahar Lal Nehru
Road, Allahabad, Uttar Pradesh
Mob:- 9453230029

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[Under Section 18(1) read with Sections 14, 15, 16 & 17 of the National Green Tribunal Act, 2010]

DISTRICT & STATE : PRAYAGRAJ, UTTAR PRADESH

1. Ankit Tiwari resident of 35/10, Jawahar Lal Nehru Road, Allahabad, Uttar Pradesh, India.Applicant

Versus

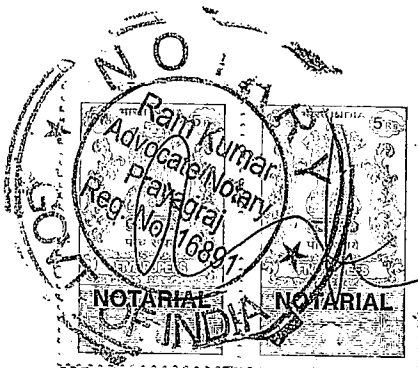
1. ISKCON Prayagraj through its President Achyut Mohan Das alias Aditya Mittal, resident A/161, Kasiraj nagar, Baluaghat, Allahabad, Uttar Pradesh, India
2. UTTAR PRADESH STATE POLLUTION CONTROL BOARD (UPPCB), Building No. TC 12V Vibhuti Khand, Gomti Nagar, LUCKNOW, Uttar Pradesh.
3. UTTAR PRADESH STATE POLLUTION CONTROL BOARD (UPPCB) Uttar Pradesh Pollution Control Board, Avas Vikas Parishad Colony, Sector-10, Scheme No.- 3, Jhunsi, Prayagraj, Uttar Pradesh, India
4. Prayagraj Development Authority through the Vice Chairman, 7th & 8th Floor, Indira Bhawan, Civil Lines, Prayagraj, Uttar Pradesh 211001.

.....Respondents

Ankit Tiwari son of Mr. Akhilesh Tiwari resident of 35/10, Jawahar Lal Nehru Road, Allahabad, Uttar Pradesh, India.

Religion : Hindu

Profession : Business



03-12-24

Tiwari

(DEPONENT)

I, the deponent abovenamed do hereby solemnly affirm and state of oath as under:-

1. That the deponent is the Applicant himself and therefore is well acquainted with the facts deposed to below.
2. That after filing of the abovementioned Original Application No. 215 of 2024 Anit Tiwari versus Iskon and others, certain developments have taken place and have recently come into the knowledge of the applicant. Thus, the applicant is filing the present supplementary affidavit to bring on record the recent development in the present case.
3. That the Zonal Officer, Prayagraj Development Authority (hereinafter referred to as 'PDA') has made communication to the Vice President PDA, vide letter dated 28.03.2024, stating that in furtherance to the online complaint no. 40017524010438 dated 11.03.2024 regarding unauthorized construction being done. Has, submitted that there is no construction work being done on spot and if any work will be done. Copy of the letter dated 28.03.2024 by the Zonal Officer PDA is attached as **ANNEXURE-SA-1.**
4. That it is submitted by the applicant that the zonal officer in connivance with the respondent 1 has submitted a false and fabricated report as on 09.03.2024 there was construction being done in full swing at the plot in question with labours and Jcb machines operating. Copy of the photographs showing the ongoing construction at the plot in question is attached as **ANNEXURE-SA-2.**
5. That the Authorities are hand in glove with the respondent 1 and are unable to take any action. Moreover, the authorities are acting as shield for the respondents as a result of which the construction is going on in full swing and be completed by the 1st week of 2025 as per the brochure published by respondent 1. Copy of the brochure published by respondent 1 is attached as **ANNEXURE-SA-3.**



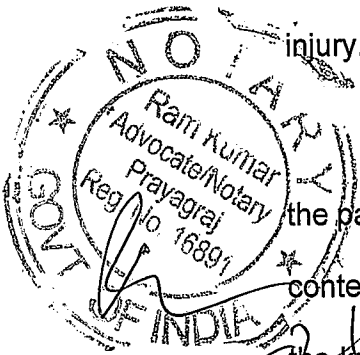
Anit Tiwari

6. That the Zonal Officer PDA in its report has himself stated that any construction being done in the plot in question would be illegal and action would be taken against the person. Yet no action till date has been taken against the respondent 1.

7. That the authorities are a mere spectator and unable to stop the respondent 1. Thus, the intervention from this Court is required. It is therefore most respectfully prayed that the Court may be pleased to stay the ongoing construction and to enquire as to why the authorities are not taking action against the respondents, otherwise the applicant would suffer irreparable harm and damage.

8. That the present supplementary affidavit may be taken on record along with its annexures and be treated as an integral part of the Original Application No. 215 of 2024 filed under section 18(1) read with section 14, 15, 16 and 17 of the National Green Tribunal Act, 2010, otherwise the applicant shall suffer irreparable harm and injury.

I, the deponent abovenamed, do swear on oath and state that the contents of the paragraph no.3, 4 and 5 of the affidavit are based on perusal of records, that the contents of the paragraph no. 1, 2, 6, 7 and 8 of the affidavit are true to the best of the knowledge of the deponent, and those of paragraph no. -NIL- of the affidavit are based on the legal advice all of which the deponent believes to be true and that no part is false and nothing material has been concealed.



03/12/24





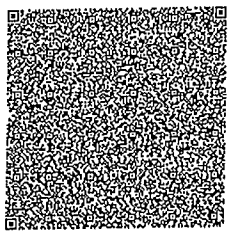




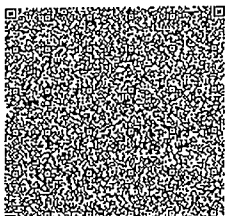
Ankit Tiwari
(DEPONENT)

VERIFIED BY _____

Identified by Mr. Ankit Tiwari
has sworn before me on _____
who has accepted the contents of
this affidavit to be true.

IDENTIFIED BY
ADVOCATE/PRAYAGRAJ

Ram Kumar
Advocate/Notary Prayagraj
03/12/24
Tiwari

 	 
<p>भारत सरकार Government of India</p>	<p>सूचना / INFORMATION</p>
<p>भारतीय विशिष्ट पहचान प्राधिकरण Unique Identification Authority of India</p>	<p>आधार पहचान का प्रमाण है, नागरिकता या जन्मतिथि का नहीं। जन्मतिथि आधार नंबर धारक द्वारा प्रस्तुत सूचना और विनियमों में विनिर्दिष्ट जन्मतिथि के प्रमाण के दस्तावेज पर आधारित है।</p>
<p>नामांकन क्रम/ Enrolment No.: 1424/21139/06489</p> <p>To अंकित तिवारी Ankit Tiwari S/O: Akhilesh Tiwari, 35/10, Jawahar Lal Nehru Road, Near-Magh Mela Godam, VTC: Dahliawan, PO: Allahabad Kty., Sub District: Sorاون, District: Allahabad, State: Uttar Pradesh, PIN Code: 211002, Mobile: 9453230029</p>  <p>Validity UnkHown</p> <p>आपका आधार क्रमांक / Your Aadhaar No. : 7235 9335 0240 VID : 9185 5877 0927 5657</p> <p>मेरा आधार, मेरी पहचान</p>	<p>इस आधार पत्र को यूआईडीएआई द्वारा नियुक्त प्रमाणीकरण एजेंसी के जरिए ऑनलाइन प्रमाणीकरण के द्वारा सत्यापित किया जाना चाहिए या ऐप स्टोर में उपलब्ध एमआधार या आधार क्यूआर कोड स्कैनर ऐप से क्यूआर कोड को स्कैन करके या www.uidai.gov.in पर उपलब्ध सुरक्षित क्यूआर कोड रीडर का उपयोग करके सत्यापित किया जाना चाहिए।</p> <p>आधार विशिष्ट और सुरक्षित है।</p> <p>पहचान और पते के समर्थन में दस्तावेजों को आधार के लिए नामांकन की तारीख से प्रत्येक 10 वर्ष में कम से कम एक बार आधार में अपडेट कराना चाहिए।</p> <p>आधार विभिन्न सरकारी और गैर-सरकारी फायदों/सेवाओं का लाभ लेने में सहायता करता है।</p> <p>आधार में अपना मोबाइल नंबर और ईमेल आईडी अपडेट रखें।</p> <p>आधार सेवाओं का लाभ लेने के लिए एमआधार ऐप डाउनलोड करें।</p> <p>आधार/बायोमेट्रिक्स का उपयोग न करने के समय सुरक्षा सुनिश्चित करने के लिए आधार/बायोमेट्रिक्स लॉक/अनलॉक सुविधा का उपयोग करें।</p> <p>आधार की मांग करने वाले सहमति लेने के लिए बाध्य हैं।</p> <p>Aadhaar is proof of identity, not of citizenship or date of birth (DOB). DOB is based on information supported by proof of DOB document specified in regulations, submitted by Aadhaar number holder.</p> <p>This Aadhaar letter should be verified through either online authentication by UIDAI-appointed authentication agency or QR code scanning using mAadhaar or Aadhaar QR Scanner app available in app stores or using secure QR code reader app available on www.uidai.gov.in.</p> <p>Aadhaar is unique and secure.</p> <p>Documents to support identity and address should be updated in Aadhaar after every 10 years from date of enrolment for Aadhaar.</p> <p>Aadhaar helps you avail of various Government and Non-Government benefits/services.</p> <p>Keep your mobile number and email id updated in Aadhaar.</p> <p>Download mAadhaar app to avail of Aadhaar services.</p> <p>Use the feature of Lock/Unlock Aadhaar/biometrics to ensure security when not using Aadhaar/biometrics.</p> <p>Entities seeking Aadhaar are obligated to seek consent.</p>
  <p>अंकित तिवारी Ankit Tiwari जन्म तिथि/DOB: 09/09/1992 पुरुष/ MALE</p> <p>आधार पहचान का प्रमाण है, नागरिकता या जन्मतिथि का नहीं। इसका उपयोग सत्यापन (ऑनलाइन प्रमाणीकरण, या क्यूआर कोड/ऑफ़लाइन एक्सप्रेस की स्कैनिंग) के साथ किया जाना चाहिए। Aadhaar is proof of Identity, not of citizenship or date of birth. It should be used with verification (online authentication, or scanning of QR code / offline XML).</p> <p>Aadhaar no. issued: 07/07/2014</p>	  <p>पता: S/O: अखिलेश तिवारी, 35/10, जवाहर लाल नेहरू रोड, माघ मेला गोदाम के पास, दहियावन, इलाहाबाद कचहरी, इलाहाबाद, उत्तर प्रदेश - 211002</p> <p>Address: S/O: Akhilesh Tiwari, 35/10, Jawahar Lal Nehru Road, Near-Magh Mela Godam, Dahliawan, PO: Allahabad Kty., DIST: Allahabad, Uttar Pradesh - 211002</p>  <p>93350240</p>

Tiwari

BEFORE THE NATIONAL GREEN TRIBUNAL AT DELHI

ANNEXURE – SA – 1

IN

SUPPLEMENTARY AFFIDAVIT

IN

ORIGINAL APPLICATION NO. 215 OF 2024

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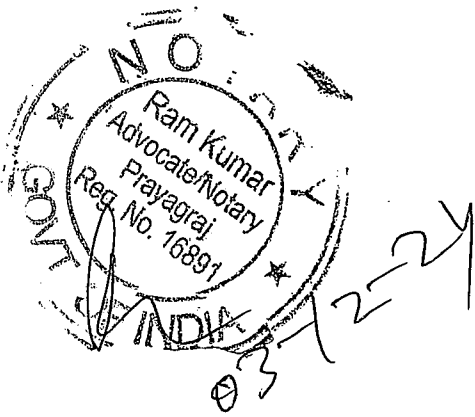
Ankit Tiwari

.....Applicant

Versus

ISKCON Prayagraj and others

.....Respondents



Tiwari

प्रयागराज विक97 प्राधिकरण, प्रयागराज

प्रेषक,

जोनल अधिकारी
प्रयागराज विकास प्राधिकरण,
प्रयागराज

सोचा में,

उपाध्यक्ष
प्रयागराज विकास प्राधिकरण,
प्रयागराज

पत्रांक : 30 / जो0अ0 / जोन-2 / वि0प्रा0 / 2024

दिनांक : 28/02/2024

विषय-आनलाइन संदर्भ सं0-40017524010438 दिनांक 11.03.2024 के संबंध में।


महोदय,

कृपया समन्वित शिकायत निवारण प्रणाली, उत्तर प्रदेश पोर्टल पर अंकित आनलाइन संदर्भ सं0-40017524010438 दिनांक 11.03.2024 का संदर्भ ग्रहण करने का कष्ट करें। प्रश्नगत शिकायत में श्री अंकित तिवारी पुत्र श्री अखिलेश तिवारी निवासी 35/10 जवाहर लाल नेहरू रोड तहसील-सदर प्रयागराज द्वारा इस्कॉन मंदिर बलुआघाट प्रयागराज में अवैध निर्माण किये जाने की शिकायत की गयी है।

संदर्भित शिकायत के क्रम में क्षेत्रीय भवन निरीक्षक द्वारा निरीक्षण उपरान्त अवगत कराया गया कि संदर्भित स्थल पर वर्तमान में किसी प्रकार निर्माण कार्य होते हुए नहीं पाया गया है। स्थल पर निर्माण कार्य प्रारम्भ होने पर उ0प्र0 नगर नियोजन एवं विकास अधिनियम 1973 की सुसंगत धाराओं में कार्यवाही प्रस्तावित की जायेगी।

कृपया उक्तवत् होने का कष्ट करें।

भवदीय,


जोनल अधिकारी
प्रयागराज विकास प्राधिकरण,
प्रयागराज



28/2/24

Tiwari

BEFORE THE NATIONAL GREEN TRIBUNAL AT DELHI

ANNEXURE – SA – 2

IN

SUPPLEMENTARY AFFIDAVIT

IN

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DISTRICT & STATE : PRAYAGRAJ, UTTAR PRADESH

Ankit Tiwari

.....Applicant

Versus

ISKCON Prayagraj and others

..... Respondents



Tiwari

09-03-2024



09-03-2024



Xiwasu

09-03-2024



09-03-2024



Shivani

09-03-2024



09-03-2024



NOTARY
Ran Kumar
Advocate/Notary
Prayagraj
Reg. No. 16891
INDIA

Tiwari

BEFORE THE NATIONAL GREEN TRIBUNAL AT DELHI

ANNEXURE – SA – 3

IN

SUPPLEMENTARY AFFIDAVIT

IN

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Ankit Tiwari

.....Applicant

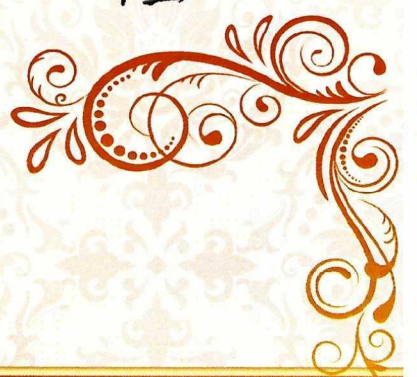
Versus

ISKCON Prayagraj and others

.....Respondents



Tiwari



Cultural & Spiritual Landmark of Prayagraj



**BHAKTI VEDANTA
CULTURAL CENTER**



A/161, Kashiraj Nagar, Balua Ghat, Prayagraj - 211003

Tiwari

VISION

In today's world, there is a dire need of reviving the value system through spiritual knowledge. India has been well-known throughout history for having the treasure of culture, values and ethics based on the scriptural roots. But in the modern times, Indian people have been misguided to forget this great treasure in their backyard and chase after so-called materialistic life that lacks any strong moral basis.

To rekindle the true wisdom and revive the real spirit of our human life, ISKCON Prayagraj is coming up with "Bhakti Vedanta Cultural Centre (BVCC)" which can potentially propagate spiritual knowledge to society at large, rejuvenate the cultural values to check the imbalance of values in life and achieve real unity and peace in the world.

Facilities @ BVCC

TEMPLE HALL

The main temple hall of Sri Sri Radha-Venimadhava will have a capacity of 350 devotees

PRASADAM HALL

Hall for serving Prasadam will have a seating capacity of 150 devotees

BANQUET

Banquet hall for celebration of events & festivities with a capacity of 50 people

MEGA KITCHEN

Ultra hygienic kitchen facility with modern machines & certified team, daily catering capacity of 5000 meals and a free anna-daan counter

GUEST ROOMS

We will have 31 Deluxe rooms, 8 well equipped rooms & 3 Suites rooms

GOVINDA'S

Our Multicuisine Govinda's restaurant will have seating capacity of 100 guests

NATURAL & MATCHLESS

Two elegant Gift Shops having a range of organic & cow products, devotional items & spiritual books & Splendid pieces of art

ACADEMY AREA

The academies will have seminar halls with a total capacity of 100 students

Atwari

NO. 13
Rajendra Prasad
Advocate
Prayagraj
Reg. No. 1689
STATE OF INDIA

ACADEMIES @ BVCC



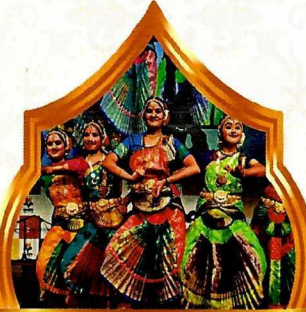
VIDYAPITHA

Study of core shastric courses



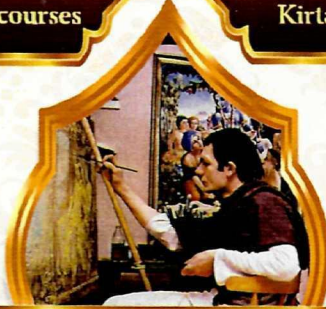
SVARA-BRAHMA

Kirtan & Music Academy



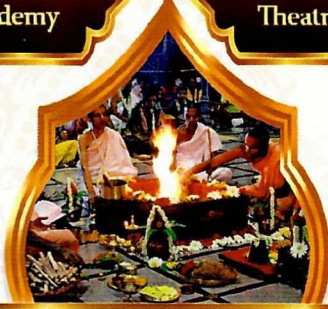
NRITYA VATIKA

Theatrics, Dance & Drama



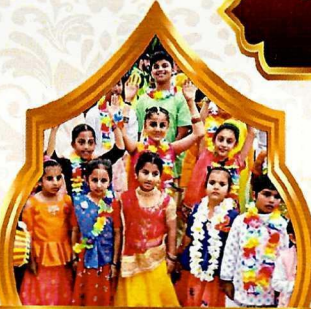
KALA NIKETAN

Fine arts & Painting



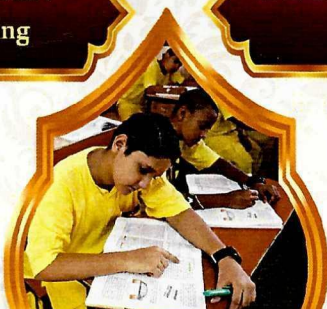
DHARMA KENDRA

Pujari Training



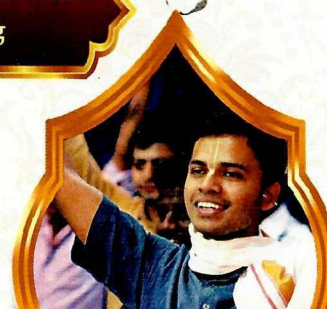
SAMSKRITI

Value Education (5 - 12 Yrs)



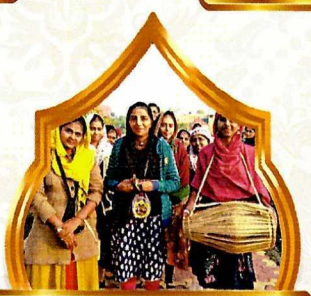
VIDYASHRAM

Spiritual Education for Teens



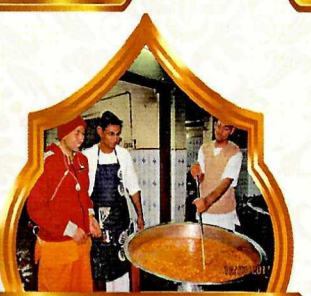
YUVAKSHETRA

Lifestyle Training for Youth



VAISNAVI SANGHA

Spiritual circle for Ladies



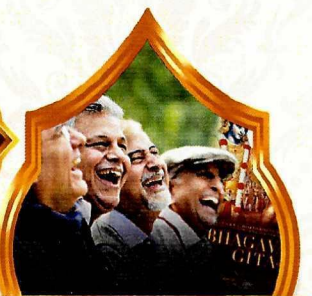
BHOJASHALA

Culinary School



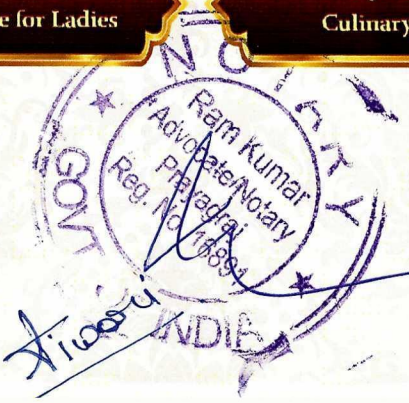
RAJARSHI

(Vedic value based Leadership)



VIDURA SANGHA

Spiritual circle for Senior citizens



BVCC (Phase -1)



GANGA

Sattvik Guest House for pilgrims
(with Prasadam & Katha facility)

YAMUNA

Vedic Ashram and Gurukul



SARASVATI

Community Anna-daan Kitchen
(for 5000 meals) and
Classrooms for Katha & Kirtan

Projected inauguration: 1st week of Jan'25

Handwritten signature and stamp: *Rel. Kumar*, *Advocate*, *Reg. 18891*, *03/224*



107 Requirements

Requirements	Description	Laxmi needed
Tiles	sq ft 65000 (with transportation from Gujarat)	₹ 50/sq ft
Granite	sq ft 32000 (with transportation from Vizag)	₹ 120/sq ft
Marble	sq ft 12000 (with transportation from Rajasthan)	₹ 60/sq ft
Labour & material cost		₹ 60/sq ft + 30/sq ft
Plumbing & Sanitation	65 Washrooms, 2 Kitchens, Annadan Hall	₹ 96 Lacs
Furniture	Basic furniture in rooms, Dining furniture, Katha hall, Vedic library, Management office, Seva office	₹ 1.26 Cr
Electric	Cables, Fans & Lights, Switch boards, Piping	₹ 1.20 Cr
Power system	Transformer, Generator, Inverter & Batteries, Stabilisers	₹ 20 lacs ₹ 15 lacs ₹ 8 lacs ₹ 5 lacs
Equipments	4 lifts, ACs in guest room, Water geyser centralised, Drinking water plant, LEDs (classrooms) & Sound system	₹ 60 lacs (each of 15lacs), ₹ 25 lacs (in total), ₹ 6 lacs, ₹ 3 lacs, ₹ 12 lacs
Solar panels		₹ 30 lacs (₹ 10 lacs per building)
Doors & Windows	Ganga, Yamuna, Sarasvati	₹ 50 lacs
Food For Life (Pilgrims Prasada Distribution)	Daily 20,000 meals	₹ 25 per meal, ₹ 5 lacs per day, ₹ 2.5 Cr for 50 days Prasada distribution during mahakumbha mela

Projected inauguration: FFL Project: 3rd week of Dec'24'

Handwritten signature



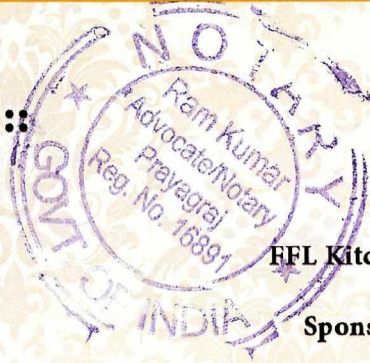
Have opportunity to sponsor any of the single complete unit of BVCC:

Requirements	Laxmi needed
Full Kitchen & Prasadam Hall	1.5 Cr
Only Kitchen with equipments	1 Cr
Complete Building:	
- Ganga	7.5 Cr
- Yamuna	4.5 Cr
- Sarasvati	5 Cr
Note: Fully sponsored Building to be named after the donor	
Pravachan Hall (exclusively for Lectures)	45 lacs
Each room in Sant Nivaas (Yamuna)	11 lacs
Each room in Guest House (Ganga)	15 lacs
Studio for recording online katha	25 lacs
Academy area	40 lacs
Vedic library facility	20 lacs
Books in Vedic library	7 lacs
Vrindavan theme garden area	5 lacs
Ayodhya theme garden area	5 lacs
Jagannath Puri theme garden area	6 lacs
Big trees plantation in campus	2 lacs

:: Donate as per your Suitability ::

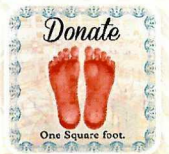


A/c Name: ISKCON
A/c No: 3249572543
IFSC code: KKBK0005076
UPI : iskcon.prayagraj@kotak



Already sponsored:
Ganga, Yamuna, Sarasvati:
entire civil construction (7 Cr)
EFL Kitchen setup & equipments: 1.5 Cr

Sponsor 1 square foot :
₹ 5100



For cash/cheque donation, call 638 738 9090

For 80G receipt,
please share full name, full address, PAN no & mobile no.

For Your valuable donations, receipts and acknowledgement letter will be provided.

FOUNDER Member:
25 Lacs