

IN THE SUPREME COURT OF INDIA

WRIT JURISDICTION

WRIT PETITION (Crl) No 135 of 2011

**(A WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION OF INDIA)**

IN THE MATTER OF-

Sanjiv Rajendra Bhatt, IPSPetitioner

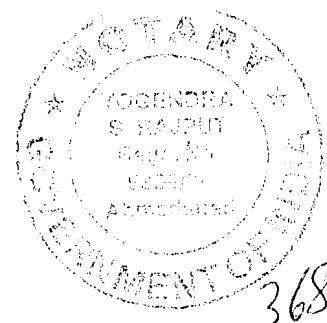
Versus

Union of India & OthersRespondents

ADDITIONAL AFFIDAVIT OF THE PETITIONER

I, Sanjiv Rajendra Bhatt, the petitioner herein, solemnly affirm on oath and state as under:

1. That, the petitioner is an Indian Police Service Officer of 1988 batch allotted to Gujarat Cadre and is therefore, *inter alia*, a Police Officer as defined by Section 2 (11) of the Bombay Police Act, 1951. It is humbly submitted that Section 64 (b) of the Bombay Police Act 1951, casts a mandatory duty on the petitioner to obtain intelligence concerning the commission of cognizable offences or designs to commit such offences, and to lay such information and to take such other steps, consistent with law as shall be best calculated to bring offenders to justice or to prevent the commission of cognizable offences.
2. That September 2009 onwards, the petitioner was time and again required to access the e-mail account of Shri. Tushar Mehta and came across several e-mail exchanges that were clearly indicative of an unholy nexus and illegal complicity



between high functionaries of the State of Gujarat and other extraneous political entities, in the on-going cover up operations and machinations, aimed at shielding powerful persons from prosecution for alleged heinous crimes. The petitioner, as duty bound, continued to obtain evidentiary intelligence concerning the machinations of the State of Gujarat and repeatedly sought to bring them to the notice of the Special Investigation Team appointed by this Honourable Court. The said facts were also brought to the notice of the Learned Amicus Curiae appointed by this Honourable Court in SLP (Criminal) 1088 of 2008.

3. It is humbly submitted that it was within the knowledge of Shri. Tushar Mehta that the petitioner had been taking necessary steps and measures to obtain and secure the evidentiary intelligence concerning the illegal machinations of the State of Gujarat. The petitioner had time and again tried to dissuade Shri. Tushar Mehta from continuing his connivance in the illegal machinations of the State of Gujarat and tried to persuade him to bring the facts of the said modus to the knowledge of the concerned authorities and courts. That Shri. Tushar Mehta did not heed to the advice of the petitioner and eventually started using the e-mail account tusharmehta64@yahoo.com for the purpose of exchanging sensitive information.

4. The petitioner submits that the e-mails and attachments that have been annexed with this additional affidavit have been duly downloaded from the e-mail account of Shri. Tushar Mehta tusharmehta99@yahoo.co.in and are the true copies of the



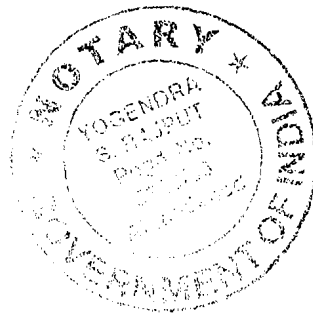
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same. The petitioner most humbly submits that he believes it to be his bounden duty to bring these facts to the notice of this Honourable Court and therefore this additional affidavit.

5. That the Petitioner, to the best of his ability, has tried to compile certain relevant information from within the said e-mails.

Special Investigating Team –Godhra Riot Cases

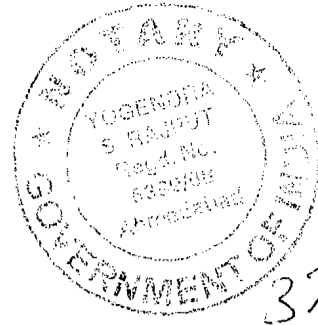
1. On 05.02.2010 at 6.03 p.m, nine reports submitted by the SIT to this Hon'ble Court in regard to nine major cases of Gujarat Riots were sent from a Gujarat Government e-mail account to Sh.Tushar Mehta and to Sh.G.C.Murmu by Shri Vijay Badekha, Under Secretary, Home. Copy of the same is annexed herewith and marked as **ANNEXURE P-33** (Page ³⁸⁴ to Page ⁴⁰⁸)
2. On 06.02.2010 at 12.13 p.m. Shri Gurusurthy Swaminathan wrote to Shri Tushar Mehta that he has received the reports and not the attachments. Copy of the same is annexed herewith and marked as **ANNEXURE P-34** (Page ⁴⁰⁹ to Page)
3. On 06.02.2010 at 2.21 p.m, Shri Vijay Badheka again forwarded the above said nine reports along with two other documents containing arrest details and charge sheets, clearly stating that it was a **SECRET** document, to Sh.Tushar Mehta and Sh.G.C.Murmu. **ANNEXURE P-35** (Page ⁴¹⁰ to Page)



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4. On 07.02.2010 at 6.59 am Shri Gurumurthy wrote to Tushar Mehta that he had received the reports but not the annexures. **ANNEXURE P-36** (Page⁴¹¹.....to Page)
5. On 15.03.2010 at 10.12 a.m., Shri Gurumurthy Swaminathan forwarded a note for hearing of March 15, 2010 in relation to SIT cases before this Hon'ble Court to Shri Ram Jethmalani, Mahesh Jethmalani, Pranab Badekha. **ANNEXURE P-37** (Page⁴¹²⁻⁴¹⁵.....to Page)

Comments: This Hon'ble Court directed that SIT reports were to be given to the Learned Amicus Curie and the State Counsel but the State Authorities in violation of the Courts order provided copies of documents to an outsider like Shri Gurumurthy who is helping the accused in their defence. The action on part of the Addl. Advocate General, of sharing documents which were marked SECRET by Under Secretary (Home), with an outsider like S Gurumurthy. That Shri Gurumurthy in turn prepared and sent a note for the hearing of March 15,2010 in the matter of the SIT in the Hon"ble Supreme Court to the Advocates for the accused persons.



EPISODE OF BIPIN AMBALAL PATEL

1. Sh. Bipin Ambalal Patel is an accused in Gulbarg Society massacre case being Session Case No. 152/2002. The said accused is charge sheeted by SIT constituted by the order of this Hon'ble Court. Sh Gaurav Goel is the Advocate for Sh Bipin Ambalal Patel in this Hon'ble Court in Case Crl. M P No 8187-88 of 2010 in W P Crl No. 37 -52/ 2002. Sh Tushar Mehta is the Additional Advocate General of State of Gujarat.
2. On 4.4.2010 at 10.29 p.m Sh Tushar Mehta prepared and sent a draft of the Crl. M.P to be filed by Sh Bipin Ambalal Patel in W P Crl No. 37 -52/2002 to Sh Gaurav Goel of E C Aggarwal and Associates Office. Copy of the same is annexed herewith and marked as **ANNEXURE P-38.**
(Page 446 to 446).
3. On 4.4.2010 at 10.57 p.m., Sh Tushar Mehta also sent a revised draft copy of the said Crl. M. P to be filed by Sh Bipin Ambalal Patel in W P Crl 37-52/2002 to Gaurav Goel. Copy of the same is annexed herewith and marked as **ANNEXURE P-39.** (Page 447 to Page 448)
4. On 15.4.2010 at 7.09 p.m., Sh Tushar Mehta prepared a reply affidavit for Sh Bipin Ambalal Patel to be filed in this Hon'ble Court in his Crl M P No. 8187-88 of 2010 in W.P. Crl No. 37-52 of 2002 to Sh G C Murmu, Principal Secretary to the Chief Minister of Gujarat. Copy of the



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same is annexed herewith and marked as **ANNEXURE P-40** (Page.....to Page.....).
449-470

5. On 15.04.2010 at 7.37 p.m. Sh. Tushar Mehta forwarded three documents viz.
- Affidavit of the State of Gujarat in Crl. Misc. Petition No.19816/2009 in W.P.Crl. No. 37 to 52/2002 filed in case of father Cedric Prakash;
 - Crl. Misc. Petition filed by Shri Bipin Ambalal Patel in Writ Petition (Crl) 37-52 of 2002;
 - Further Affidavit of Shri Bipin Ambalal Patel in Crl. Misc. Petition No. 8187-88 of 2010 to Sh. Mahesh Jethmalani. Copy of the same is annexed herewith and marked as **ANNEXURE P-41** (Page.....to Page.....).
471-482
6. On 18.04.2010 at 9.24 p.m. Shri Tushar Mehta forwarded the Crl. Misc. Petition filed by Shri Bipin Ambalal Patel in W.P. Crl. No. 37-52 of 2002 and also a further Affidavit to be filed by Shri Bipin Ambalal Patel to Shri Gurumurthy Swaminathan. Copy of the same is annexed herewith and marked as **ANNEXURE P-42** (Page.....to Page.....).
483-508
7. On 13.04.2010 at 11.54 p.m. Sh. Mohd. Sheikh, Steno of Sh. Tushar Mehta sent a mail to Sh.Gurumurthy Swaminathan with an attachment of an Affidavit to be filed on behalf of the State of Gujarat in Crl.Misc. Petition No.19816/2009 in W.P.(Crl.) No.37-52 of 2002. Copy of

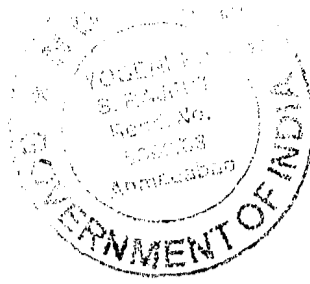


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the same is annexed herewith and marked as **ANNEXURE**

P-43 (Page ⁵¹⁰ 509 to Page.....)

8. On 14.04.2010 at 4.52 p.m., Shri Guruswamy Swaminathan forwarded correct copy of the above referred Affidavit of the State of Gujarat to Sh. Tushar Mehta, Sh. Amit Shah, Sh. Mahesh Jethmalani and Shri Ram Jethmalani. The said mail contains a note from Sh. Guruswamy Swaminathan to Sh. Tushar Mehta wherein he states that " I have merely added as sub-paras from the general statements contained in the earlier Draft seen by Ram Jethmalani which is relevant to SIT issue. It may go subject to what Mahesh may think". Copy of the same is annexed herewith and marked as **ANNEXURE P-44** (Page ^{511 - 530}to Page.....)
9. On 15.04.2010 at 7.08 p.m., Shri Tushar Mehta forwarded the said Affidavit of the State of Gujarat to Shri G.S. Murmu, Principal Secretary to the Chief Minister. Copy of the same is annexed herewith and marked as **ANNEXURE P-45** (Page ^{531 - 533}to Page.....)
10. On 18.04.2010 at 10.08 p.m., Sh. Amit Shah sent a note to Sh. Tushar Mehta. The said note dated 31.03.2010 from Sh. Guruswamy Swaminathan to Sh. Amit Shah asking Sh. G.C. Murmu to send details necessary for drafting the Affidavit. Copy of the same is annexed herewith and marked as **ANNEXURE P-46** (Page ⁵³⁴to Page.....)



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11. On 18.04.2010 at 10.11 p.m., Sh. Gurumurthy Swaminathan sent the draft Affidavit to be filed before this Hon'ble Court in the matter of S.I.T Gujarat Riot Cases on behalf of the State of Gujarat to Shri Narendra Modi, Sh. Amit Shah, Sh. Ram Jethmalani, Shri Mahesh Jethmalani and Shri Pranav Badekha.

Copy of the same is annexed herewith and marked as

ANNEXURE P-47 (Page⁵³⁷.....to Page.....)

12. On 18.04.2010 at 4.54 p.m, Shri Amit Shah, Minister of State for Home of Gujarat forwarded a draft Affidavit of Gujarat Govt. to be filed in CrI. Misc. Petition No. 19816/2009 in W.P.(CrI.) No.37-52 of 2002 in the matter of father Cedric Prakash to Shri Tushar Mehta.

Copy of the same is annexed herewith and marked as

ANNEXURE P-48 (Page⁵⁵⁷⁻⁵⁵⁹.....to Page.....)

13. On 18.04.2010 at 8.50 p.m., Sh.Tushar Mehta forwarded the Affidavit of State of Gujarat to be filed in the CrI.Misc. Petition No.19816 of 2009 in W P CrI 37-52/2002 to Sh.Gurumurthy Swaminathan.

Copy of the same is annexed herewith and marked as

ANNEXURE P-49 (Page⁵⁶⁶⁻⁵⁶⁸.....to Page.....)

Comments: From the aforesaid, it is clear that Shri Tushar Mehta, despite being the Additional Advocate General of the State of Gujarat, had prepared the CrI.Misc.Petition filed by accused Bipin Ambalal Patel in Writ Petition (CrI.) No.37-52 of 2002 before this Hon'ble



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that the said note was forwarded to Shri N. Ram of Hindu by Shri Gurumurthy Swaminathan on 17.02.2010. A copy of the same is annexed herewith and marked as

ANNEXURE P-50. 562-564

Comments: In para 10 to 13 of the said note sent to Shri. N. Ram of the Hindu it is stated that Hon'ble Justice Arijit Pasayat, who headed the Bench that directed the SIT to look in to the complaint of Zakia Jafri in SLP No. 1088 of 2008 on 09.05.2009 and within six days on 15.05.2009 he accepted appointment as the head of Competition Commission of India. This requires to be viewed seriously by this Hon'ble Court.

Interrogation of Sh.Narendra Modi by the S.I.T

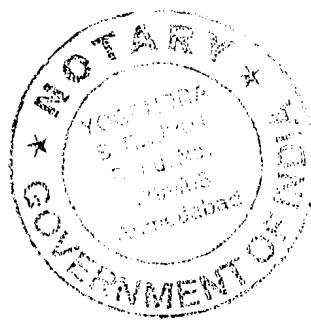
1. On 27/28.03.2010 Sh.Narendra Modi was interrogated by the Special Investigating Team.
2. On 30.03.2010 Shri Gurumurthy Swaminathan prepared and forwarded a Memorandum to be given to the President and the Prime Minister of India to Shri Amit Shah, Sh.Narendra Modi and Sh.Mahesh Jethmalani. The said Memorandum was to be given to the President and the Prime Minister by Sh. L.K.Advani, Mrs.Sushma Swaraj, Sh.Arun Jaitley and Sh. Nitin Gadgiri inter alia demanding investigations against Ms. Teesta Setalvad and her organization. The said mail contains a note from Sh.Gurumurthy Swaminathan to Sh.Narendra Modi.



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3. On 31.03.2010 at 8.34 p.m., Shri Gurumurthy Swaminathan addresses a note to Sh. Mahesh Jethmalani with a copy to Sh. Ram Jethmalani, Sh. Pranav Badheka and Sh. Amit Shah. The note states that the submission of Memorandum will put many on defensive. The aforesaid note was forwarded on 18.04.2010 at 4.53 pm by Shri Amit Shah to Shri Tushar Mehta along with the copy of the Memorandum. Sh. Tushar Mehta forwarded the said Memorandum at 10.24 p.m. and on 10.27 p.m. to the Resident Commissioner of Gujarat on his official e-mail I.D. A copy of the same is annexed herewith and marked as **ANNEXURE P-51**. (Page ⁵⁶⁵ to Page ⁶⁰⁷)

Comments: Shri. Gurumurthy in March 2010 had envisaged three situations regarding the report to be submitted by the SIT before this Hon'ble Court. Enlisting the third option he stated that if the SIT were a terrified body, fearing the ghost of the non state actors and about its perceived image that unless it does something against Modi it will not be seen as an independent body, it may submit a wishy-washy report saying that there does appear to be commissions and omissions not amounting to crime. Shri. Gurumurthy went on to opine that from amongst the three options this option was distinctly possible. It is also stated that as part of political strategy of BJP, submission of the attached memorandum to the President will put many on the defensive. That it seems

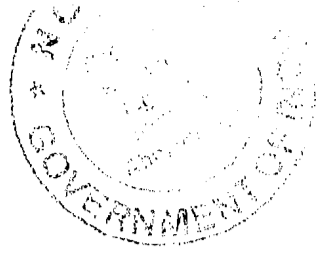


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that the Additional Advocate General was actively involved in drafting of a Political Memorandum addressed to the President of India and to be submitted by Shri L.K. Advani, Smt. Sushma Swaraj, Shri Arun Jaitly and Shri Nitin Gadakari.

Sohrabuddin Fake Encounter Case

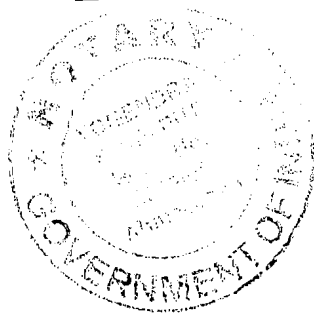
1. On 14.09.2009 at 2.44 p.m. from the official e-mail id of SIT Godra Cases i.e. sit.godracases@gmail.com, a document of Sorabuddin was sent to Shri Tushar Mehta. On the same day at 5.12 pm another mail was sent from the official e-mail id of SIT Godhara cases to Shri Tushar Mehta along with an attachment. A copy of the said two e-mails is annexed herewith and marked as **ANNEXURE P-52**. (Page ⁶⁰⁸ to Page).
2. On 12.01.2010, this Hon'ble Court by a reasoned judgment passed in Writ Petition (Crl.) No.6/2007 transferred the investigation of killing of Shri Sohrabuddin and his wife to the CBI. Some observations were made in the said judgment in regard to Smt. Geeta Johri, the earlier Investigating officer of the State of Gujarat. Therefore, the CBI took over the investigation under Sh. Amitabh Thakur, the Investigating officer of CBI.
3. On 25.03.2010 at 11.23 p.m, Sh.Tushar Mehta forwarded a letter by way of an attachment to Mrs. Geeta Johri. It is a draft letter addressed to Shri Amitabh Thakur SP CBI and



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Chief Investigating Officer of Sohrabuddin's Case from Geetha Johri. A copy of the same is annexed herewith and marked as **ANNEXURE P-52A.** (Page ⁶⁰⁹ to Page)

4. On 25.07.2010 Sh.Amit Shah was arrested in the fake encounter case of Shri Sohrabuddin.
5. On 26.07.2010 at 12.05 a.m. Shri Gurumurthi Swaminathan forwarded a note to Sh.Tushar Mehta for Sh. Nitin Gadgiri stating that the arrest of Sh.Amit Shah is a conspiracy and it is apprehended that the CBI may involve some BJP leaders in Rajasthan and also may target Sh.Modi. On the same day at 12.58 a.m., Sh. Tushar Mehta returned the corrected version of the aforesaid note to Sh.Gurumurthy Swaminathan. A copy of the same is annexed herewith and marked as **ANNEXURE P-53.** (Page to Page 610 - 624)
6. On 29.07.2010 at 03.04 p.m. Shri G C Murmu forwarded a detailed note from his official ID secno@gujarat.gov.in Secretary, Law and Order of the Govt. of Gujarat to Shri Tushar Mehta stating that the accused Sh.D.G.Vanjara and Sh. Abhay Chudasma have done commendable work. The other officers Sh.G.L.Singhal who is a suspect/accused in Ishrat Jahan fake encounter case is also mentioned in the said note. The note further states that the direction should be sought to prevent the CBI from further investigation. A copy of the same is annexed herewith and marked as **ANNEXURE P-54.** (Page ⁶²⁵⁻⁶⁶² to Page)



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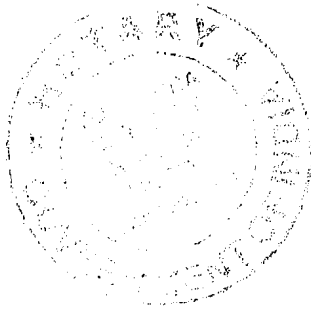
7. On the same day at 8.11 p.m. Sh.Tushar Mehta sent nine documents to Mr.Mahesh Jethmalani and Mitesh Amin, Advocates for the accused Amit Shah. All these documents were designed to provide defence to Amit Shah. A copy of the same is annexed herewith and marked as **ANNEXURE P-55.** (Page ⁶⁶³⁻⁷⁰² to Page)
8. On 03.08.2010 9.52 a.m. Shri Gurumurthy Swaminathan sent a e-mail to Shri Mahesh Jethmalani and Sh.Tushar Mehta asking for documents to defend Sh.Amit Shah. He also requested for greater coordination and instant communication. A copy of the same is annexed herewith and marked as **ANNEXURE P-56.** (Page ⁷⁰³⁻ to Page)
9. On 05.08.2010 at 11.52 p.m. Sh.Gurumurthy Swaminathan sent a reply Affidavit to Sh.Mahesh Jethmalani, Sh. Pranav Badekha and Sh.Tushar Mehta. The said reply-Affidavit was to be filed before the High Court in the matter of Shri Amit Shah wherein the CBI had sought his remand. A copy of the same is annexed herewith and marked as **ANNEXURE P-57.** (Page ⁷⁰⁴ to Page)
10. On 06.08.2010 at 12.41 a.m., Shri Gurumurthy Swaminathan sent the said reply-Affidavit to Sh.Pranab Badekha and Sh. Tushar Mehta. A copy of the same is annexed herewith and marked as **ANNEXURE P-58.** (Page ⁷⁰⁵ to Page 728.)



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11. On 09.08.2010 at 1.30 p.m. Sh.Tushar Mehta forwarded two documents to Sh.Gurumurthy Swaminathan casting aspersions on the Hon'ble Judges of the Supreme Court, CBI and other eminent persons. It is stated on page 11 of the said note that "*...many important orders were pronounced just before the retirement of hon'ble judges. Justice Pasayat issued order on the complaint of Mrs. Zakia Jaffri, surpassing all previous judgments of the court and entrusted the same to SIT just before his retirement. Similarly Justice Tarun Chatterjee passed order of CBI investigation on Shorabuddin encounter case when the accused had been already arrested and charge-sheet was filed in the competent court just before his retirement. Justice Kabir stayed the serial bomb blast cases without even hearing the State.*" A copy of the same is annexed herewith and marked as **ANNEXURE P-59.** (Page ⁷²⁹ to ⁸⁰⁴ Page)
12. On 16.08.2010 at 3.58 p.m. Shri Gurumurthy Swaminathan sent a draft bail application for Sh. Amit Shah, Sh.Ram Jethmalani, Sh.Mahesh Jethmalani and Tushar Mehta. A copy of the same is annexed herewith and marked as **ANNEXURE P-60.** (Page ⁸⁰⁵⁻⁸⁴⁷ to Page)

Comments: The aforesaid documents make it clear that despite the fact Amit Shah was arraigned as an accused by

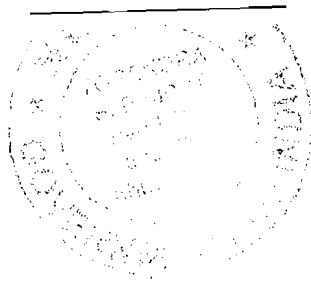


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the CBI in an Supreme Court entrusted investigation, bureaucrats attached with the CM's Office and Home, senior Police Officers and the Additional Advocate General were all making attempts to help Sh. Amit Shah in defending himself.

Ishrat Jahan fake encounter case

1. The Hon'ble High Court of Gujarat directed an investigation into the encounter of Bombay based girl Ishrat Jahan and others in Ahmedabad by a Special Investigating Team. Sh. G.L.Singhal, the then Assistant Commissioner of Police, Ahmedabad city is named as an accused in an enquiry conducted by the Metropolitan Magistrate under Section 176 of Cr.P.C.
2. On 24.09.2009 at 12.56 p.m., Sh.Tushar Mehta sent a draft Criminal Revision Application of Sh.G.L.Singhal to Sh.Vijay Badekha, Under Secretary, Home Department, State of Gujarat and Sh.Pankaj Dave with a prayer to quash and set aside the inquiry report of the Metropolitan Magistrate dated 07.09.2009. A copy of the same is annexed herewith and marked as **ANNEXURE P-61**. (Page 848 to Page 873).
3. On 03.12.2009 at 1.20 p.m., Sh.Tushar Mehta sent a draft Affidavit for the State of Gujarat to Sh.G.C.Murmu, Principal Secretary to the Chief Minister, Sh.Vijay Badekha, Under Secretary, Home Department and Joint Secretary,

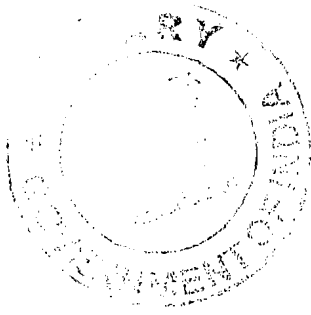


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Home Department to be filed in Crl.Misc.Petition No.19538/2009 in SLP (Crl.) No..... /2009. A copy of the same is annexed herewith and marked as **ANNEXURE P-62.** (Page ^{874 - 875} to Page)

4. On 27.01.2010 at 6.44 p.m. Sh.Tushar Mehta sent an Interim Application to be filed in SLP (Crl.) No.7305/2009 for Sh.G.L.Singhal praying impleadment as a party before this Hon'ble Court to Sh. Mahesh Aggarwal, Advocate for Sh.G.L.Singhal. A copy of the same is annexed herewith and marked as **ANNEXURE P-63.** (Page ^{876 - 882} to Page)
5. On 06.05.2010 at 10.05 a.m., Sh. Anand Shah sent a note to Sh.G.C.Murmu and Sh.Tushar Mehta. It is stated in the note that Sh.G.L.Singhal has been singled out for interrogation by the CBI in Sorabuddin fake encounter investigation as a part of sinister design to demoralize Gujarat Police. A copy of the same is annexed herewith and marked as **ANNEXURE P-64.** (Page ^{883 - 892} to Page)

Comments: From the above, it is clear that the Additional Advocate General along with some bureaucrats are making all attempts to defend Sh.G.L.Singhal who is named as an accused in an inquiry conducted by the Metropolitan Magistrate under Section 176 of Cr.P.C. and also there is an investigation going on by a Special Investigating Team under the direct supervision of the High Court against Sh. G.L.Singhal. On one side, the said officers are preparing

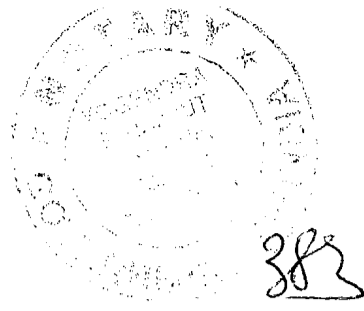


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and filing various petitions and Affidavits on behalf of the State and on the other side the same officers are preparing and getting filed Applications/Affidavits on behalf of the so-called accused persons.

Additional Secretary (Home)'s affidavit drafted by an outsider i.e. Gurumurthy Swaminathan in consultation with the advocates of the accused persons

1. On 7.4.2010 at 4.03 pm G C Murmu, Secretary to Chief minister forwarded to Tushar Mehta, a draft of an affidavit to be filed by Shri Dhananjay Dwivedi, IAS, Addl. Secretary Home in the matter of Zakia Jafri. Previous mails dated 2.4.2010, 3.4.2010, 5.4.2010 and 7.4.2010 contain documents which reveal extensive discussion between Gurumurthy, Ram Jethmalani, Mahesh Jethmalani, Arnit Shah, Tushar Mehta regarding finalization of the draft of the affidavit to be filed by a civil servant, namely Dhananjay Dwivedi on behalf of the State Government. Gurumurthy has stated that "It puts on record critical points which will show that it was no Hindu pogrom, that Teesta fabricated and that the muslims in Gujarat are most developed, educated and prosperous in the country."
2. Shri Ram Jethmalani and Shri Mahesh Jethmalani are the advocates for an accused name Kalubhai Maliwad appearing in Cri. M. P. No.21849-50 of 2009 in SLP No.



1088 of 2008 before the Hon'ble Supreme Court. And yet the State Governments sent their affidavit to them which was seen, vetted and contributed to by them. A copy of the same is annexed herewith and marked as **ANNEXURE**

P-65. (Page ⁸⁴³⁻⁹³⁸ to Page)

Sanjiv Shaw

Deponent

VERIFICATION

Verified at Ahmedabad on this 26th day of July, 2011 that the contents of the above additional affidavit are true and correct to the best of my knowledge and nothing material has been concealed therefrom.

Sanjiv Shaw

Deponent

IDENTIFIED BY MR.

ANNEXURE

Serial No. 6811-2011
Solemnly Affirmed &
Signed before me
R. J. Shah
26-7-2011
YOGENDRA S. RAJPUT
NOTARY PUBLIC
GOVT. OF GUJARAT
My Commission expires on 26/07/2012

