

IN THE SUPREME COURT OF INDIA

CRIMINAL ORIGINAL JURISDICTION

WRIT PETITION (Criminal) No. _____ OF 2025

(Under Article 32 of the Indian Constitution)

Rakesh Shukla and Anr

...Petitioner

Versus

State of Madhya Pradesh & Ors

...Respondents

With

CRL.M.P. No. _____ of 2025

Application for Exemption from filling original translations

With

C.R.L M.P. No. _____ of 2025

Application seeking directions

AOR FOR THE PETITIONER: SATYA MITRA

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OFFICE REPORT ON LIMITATION

1. The petition is not within time.
2. The petition is barred by time and there is delay of _____ days in filing the same against the Impugned final order and judgement dated 03.10.2024 passed by the Hon'ble High Court of Judicature at Patna in Criminal Appeal (DB) No. 564 of 2021.
3. There is delay of NIL days in refilling the petition and petition for condonation of NIL days delay in refilling has been filed.

BRANCH OFFICER

Place: New Delhi

Date: 19.07.2025

PEFORMA FOR FIRST LISTING

The Case pertains to (Please tick/check the correct box):

Central Act: (Title)	N.A
Section:	N.A
Central Rule: (Title)	N.A
Rule No(s):	N.A
State Act: (Title)	N.A
Section	N.A
State Rule: (Title)	N.A
Rule No(s)	N.A
Impugned Interim Order: (Date)	N.A
Impugned Final Order/Decree: (Date)	N.A
High Court: (Name)	N.A
Names of Judges:	N.A
Tribunal/Authority: (Name)	N.A
1. Nature of Matter:	Criminal
2. (a)Petitioner/Appellant No.1	Rakesh Shukla
(b) Email ID	N.A
(c) Mobile Phone Number:	N.A
3. (a) Respondent No.1:	The State of Madhya Pradesh
(b)Email Id	N.A
(c) Mobile Phone Number:	N.A
4. (a) Main Category Classification	N.A
(b) Sub Classification	N.A
5. Not to be listed before:	N.A
6. Similar/Pending matter:	N.A
7. Criminal Matters:	

(a) Whether accused/convict has surrendered	N.A
(b) FIR No and Date	N.A
(c) Police Station	N.A
(d) Sentence Awarded	N.A
(e) Sentence Undergone	N.A
8. Land Acquisition Matters:	N.A
(a) Date of Section 4 notification	N.A
(b) Date of Section 6 notification	N.A
(c) Date of Section 17 notification	N.A
9. Tax Matters: State the tax effect:	N.A
10. Special Category (First Petitioner)	N.A
Senior Citizen > 65 Years	N.A
SC/ST	N.A
Women/Child	N.A
Disabled	N.A
Legal Aid case	N.A
In custody	N.A
11. Vehicle Number (In case of Motor Accident Claim Matters):	N.A
12. Decided cases with citation:	N.A

Date:19.07.2025

AOR for the Petitioner(s)/Appellant(s)

Name: Satya Mitra

AOR Code: 1852

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SYNOPSIS

Child electrocuted and disabled for life

1. The present writ petition under Article 32 of the Constitution is filed by Petitioner No. 1, father of Manas Shukla, a minor who suffered 70% disability after being electrocuted by a high-tension wire. The incident occurred when the child climbed an illegally dumped heap of crushed stone behind a playground in Khurai, Madhya Pradesh to secure his ball, The illegal pile of crushed stone was placed by Lakhan Singh, owner of an unauthorized mining operation and nephew of Bhupendra Singh, ex-Cabinet Minister and sitting MLA of district Khurai Madhya Pradesh.

NHRC order not obeyed

2. Despite directions from the National Human Rights Commission to register an FIR against Lakhan and Bhupendra Singh, provide relief to the victim, and to either close or relocate the mine from the residential areas , authorities have failed to act. Instead, Petitioners face death threats and harassment by the authorities, A False criminal case has also been filed against Petitioner No. 2.

Person responsible terrorising the area

Death threats given: Life threatening to go to High Court

3. Due to Bhupendra Singh's political clout, securing legal assistance in the state of Madhya Pradesh has become nearly impossible. Fearing for their safety and in urgent need of support for their disabled child and implementation of the direction of the NHRC. The Petitioners seek the intervention and protection of this Hon'ble Court.

4. In despair, the petitioner wrote a letter dated 11.04.2025 to the District Magistrate and Superintendent of Police, Sagar, which is at **Annexure P-1** (Page ____ to ____) whose relevant extracts are as under:

“The petitioner/applicant, Rakesh Shukla, respectfully submits that despite the grave incident that occurred with my son Manas Shukla on 01.01.2025, no action was taken by the local administration or police authorities. On the contrary, under the influence of MLA Bhupendra Singh, undue pressure was exerted on the petitioner/applicant's family to leave Khurai and relocate elsewhere. As a result, the petitioner/applicant submitted a detailed complaint (Annexure– 2) before the National Human Rights Commission, regarding the said incident.

Despite the clear directions issued by the Hon’ble National Human Rights Commission on 21.03.2025 to take appropriate action in the subject matter, even after the lapse of nearly 20 days, neither of you (Respected Authorities at Serial No. 1 and 2) have taken any action against MLA Bhupendra Singh and his close relative Mr. Lakhan Singh, nor has the assistance as directed been provided, whereas the Hon'ble National Human Rights Commission had ordered to take action within 10 days.

Therefore, the humble request is made to your good offices to kindly take immediate and necessary action in accordance with the enclosed order dated 21.03.2025, so that the human rights of the petitioner/applicant, his family, and his seriously injured son Manas

Shukla may be duly protected, and appropriate legal proceedings may also be initiated without delay against the accused persons.”

5. The Petitioner also mentioned about the death threats received by him and his family in the complaint filed by him to the NHRC which is at **Annexure P-2** (Page __ to __) and whose relevant extracts are as under:

.... When I approached the Superintendent of Police, Sagar, regarding the matter, I was intercepted on the way and was threatened with death. Additionally, I was threatened that neither I nor my family would be allowed to reside in Bardha ...

6. The Petitioner wrote another letter dated 01.05.2025 to the NHRC which is at **Annexure P-3** (Page __ to __) about the continuous threats received by the victim's family whose relevant extracts are as under:

“I had made a complaint regarding the incident that happened with my son Manas Shukla on 01/01/2025, whose case number is 529/12/37/2025. No cognizance has been taken in the said complaint till now. Neither I nor my child have received any help from the government, district administration, against which I presented my sorrowful pain before the media along with our area leader Anshul Parihar ji. After the said press conference, a false FIR was lodged against Anshul Parihar by MLA Bhupendra Singh and his nephew Lakhan Singh and currently my house and my family members are also being pressured to compromise with different people. No action is being taken by the police either and many people are roaming around

my house at night. After presenting my matter before the media, I am in great danger to my life and my child is also being harassed.

So I humbly request you with folded hands to help me and instruct strict action against the current Khurai MLA and his nephew and his goons and save my life. I request you and the district administration to take action as soon as possible.”

Illegal piles of mined stones next to road in the village of Khurai, Madhya Pradesh big hazard for public: Police and authorities can't intervene because of protection from Ex Cabinet Minister Bhupendra Singh

7. Respondent No. ____, Lakhan Singh, operates a mining business in Khurai village, Madhya Pradesh. The mine illegally stores mined stone along village roads, posing a serious safety hazard to the public. Police and other authorities have failed to intervene or remove the stone piles due to the protection afforded by former Cabinet Minister Bhupendra Singh. Photographs of the piled stone from the stone crusher are as under:



The petitioner's son, while playing in the village, climbed the heap of stones, came into contact with High tension electric wire, was electrocuted, left permanently disabled.

8. The on 01.01.2025 petitioner's son, while playing in the village khurai with his friends, climbed an illegal pile of stones behind one of the playgrounds to secure a ball and came into contact with a high-tension electric wire, suffering severe injuries. He was rushed to the hospital, where doctors managed to save his life, but one of his hands had to be amputated and other parts of his body also sustained serious injuries. The permanent disability certificate of the petitioner's son, Manas Shukla, is annexed at **Annexure P-4 (Page __ to __)**. Photographs of the injuries suffered by Manas Shukla is at **Annexure P-5 (Page __ to __)** and are as under:





Madhya Pradesh Police refuses to register FIR against the owners of the Stone Crusher: Protects Lakhan Singh the nephew of Bhupendra Singh

9. The Petitioner the father of the Victim, went pillar to post to register an FIR against Lakhan Singh who is the owner of the Stone Crusher and Bhupendra Singh the MLA of District Khurai, Madhya Pradesh under whose protection the illegal mining activity is conducted for Criminal Negligence and for compensation for the injury suffered by his son. However, the police refused to register an FIR against the accused and threatened the petitioner to not pursue this matter. The Petitioner received various death threats for pursuing the matter.

Intimidation, No FIR, No Compensation: The Petitioner Writes to the NHRC

10. The Petitioner No.1 wrote to the NHRC whose relevant extracts as under:

“..Lakhan Singh Thakur, who is actively involved in local political activities, and under the protection of MLA Bhupendra Singh Thakur (Khurai), illegal mining material (gravel) is being stockpiled and stored on a public road in Village Wardha. This public road is a government-recognized common access route, vital for the daily movement of all villagers. On this path, illegal mineral stockpiling in the form of large gravel mounds has been carried out. These gravel heaps have been piled to such a height that only about 1.5 to 2 feet of clearance remains below the high-tension electricity line installed by the electricity department. Right next to these dangerous piles lies an open playground frequently used by local children. Also nearby is a cow shelter (gaushala), due to which many villagers, including people from nearly 20 surrounding villages, use this route daily. The illegal crusher operations and storage of gravel are allegedly being carried out by MLA Bhupendra Singh Thakur, his nephew Lakhan Singh Thakur, and their associates. This activity is being conducted without adherence to any safety standards, and no warning signs, barriers, or public notices have been placed to alert the public about the risk to life in this area. As a result, common people frequently pass through this area without restriction. In this context, on 01/01/2025, my minor son Manas Shukla was playing in the open ground adjacent to the area where illegal gravel stockpiling had been carried out on the public path due to illegal mining operations. The gravel mound had been piled so high that only about 1.5 to 2 feet of clearance remained below the high-tension power line of the electricity department. While playing, my son climbed the gravel heap to retrieve a ball and came into contact with the high-tension power line. As a result, his entire

body was severely burned, and during treatment, his hand had to be amputated. This tragic incident was extremely serious and life-threatening; had proper medical attention not been given in time, my son could have lost his life. Though my son survived, he has now become permanently disabled due to the loss of his hand, and his life continues to remain at risk, with ongoing medical treatment. This entire incident occurred solely due to the illegal gravel stockpiling conducted by MLA Bhupendra Singh Thakur and his nephew Lakhan Thakur. Both individuals are directly responsible and accountable for this incident and must be held liable.

Since the said crusher is operating in violation of the Mineral Storage Rules of the Government of Madhya Pradesh, the incident has occurred as a result. Moreover, **the crusher is being operated over an area exceeding the allotted land, which has directly led to the occurrence of the said incident.**

Following the incident involving my son, Manas Shukla, on 01/01/2025, he was taken to the primary health center at Bina for medical treatment. Due to the severity of his condition, he was referred to Sagar Hospital for further treatment. As the child was battling for his life in extremely critical condition, he was admitted to Bhagyodaya Hospital for advanced care. At both medical facilities, due to the critical state of the child, the police station and nearby police station were duly informed. However, despite the notification, no statements were recorded. Even though the applicant had provided information about the incident through the hospital's initial medical report signed by the

attending doctor and submitted to Bina Police Station, neither the dying declaration of the child was recorded nor the statements of the parents were taken.

I went to report the said incident, but even there, no report is being registered. Due to the involvement of the Khurai MLA and his nephew, Lakhan Singh Thakur, in the operation of the crusher, the report is not being filed.

In light of these circumstances, and due to my financial condition, I am humbly submitting this application before Your Honour so that action may be taken against them. Hon'ble Sir, this application is also being submitted because whenever I go to the police station to file a report, the information regarding the incident is conveyed to Bhupendra Singh Thakur, the MLA, and Lakhan Singh, thereby preventing any legal action from being taken by the applicant against them. When I approached the Superintendent of Police, Sagar, regarding the matter, I was intercepted on the way and was threatened with death. Additionally, I was threatened that neither I nor my family would be allowed to reside in Bardha.

This application is being submitted with the hope that if any untoward incident occurs with me or my family, then the Khurai MLA Bhupendra Singh Thakur and his nephew Lakhan Singh Thakur, who, due to their political dominance, hold considerable influence and fear in the entire Khurai region shall be held responsible.

Therefore, I humbly request you to kindly initiate strict legal action against Mr. Lakhan Singh Thakur and Mr. Bhupendra Singh Thakur, MLA of Khurai, under whose supervision the said crusher is being operated, so that justice may be served to us poor and helpless people...”

NHRC took cognizance of the complaint

Directed to register FIR, provide compensation and shut down mine

11. Taking cognizance of the petitioner's application, the **NHRC** through letter dated 21.03.2025, 09.04.2025, 23.04.2025 and order dated 13.06.2025 directed as under:

- i. District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant.**
- ii. The Superintendent of Police, Sagar, Madhya Pradesh, directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals Lakhan Singh and Bhupendra Singh.**
- iii. The District Magistrate, Sagar directed to take the necessary steps, in accordance with applicable laws, to either close relocate the mining site away from the residential area to prevent further harm to the resident.**

12. Letter dated 21.03.2025 to the NHRC by the petitioner is at **Annexure P-6** (Page ____ to ____) and is as under:

“The complainant, Rakesh Shukla, alleges that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claims that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleges that he was threatened with death and forced to leave his village by the accused.

The Commission, recognizing the gravity of the situation, has deemed the allegations as a serious violation of human rights. Consequently, it has directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.

Additionally, the Commission directs the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim

and ensure proper treatment, including an artificial hand transplant.
The Superintendent of Police, Sagar, Madhya Pradesh, is hereby directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals. Moreover, the **District Magistrate, Sagar is directed to take the necessary steps, in accordance with applicable laws, to either close relocate the mining site away from the residential area to prevent further harm to the residents**”

13. On failure of the SP and DM to file ATR to the NHRC in pursuance of the 21.03.2025 letter the NHRC wrote a follow up letter dated 09.04.2025 which is at **Annexure P-7 (Page ____ to ____)** and whose relevant extracts are as under:

“....Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either

close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of Seven days, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993”

- 14.Despite two earlier letters from the NHRC and one from the petitioner, and the failure to take any action against the accused, the NHRC issued a third letter granting the SP and DM final opportunity to file ATR. Letter dated 23.04.2025, which is at **Annexure P-8 (Page ____to____)** and whose relevant extracts are as under:

“ ...

Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim

and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission and a subsequent reminder 09.04.2025, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a final reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of two weeks, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993”

Summons issued against DM and SP of Sagar district for failing to submit the ATR and for personal appearance before the NHRC.

15.Despite three letters from the NHRC and numerous representations by the petitioner, the DM and SP of Sagar district failed to take any action against the accused and were therefore summoned to appear personally before the NHRC. Summon dated 09.05.2025 is at **Annexure P-9 (Page __ to __)** and the relevant extracts are as under:

“...WHEREAS, in the aforesaid matter the Commission had asked to submit report within Ten Days and the said directions were conveyed to you on 21.03.2025 (copy Enclosed)

AND WHEREAS, you have without lawful excuse failed to submit the requisite report in the matter within the prescribed time, despite reminders dated 09.04.2025 and 23.04.2025 (copies enclosed)

AND WHEREAS, the Commission further considered the matter on 01.05.2025 when it took very serious view and directed that summons be issued requiring your presence before the Commission in the report

NOW THEREFORE, you are hereby directed to appear in person before the Commission on 05.05.2025 at 11.00 hrs in its office at Manav Adhikar Bhawan, Block-C, GPO Complex, INA, New Delhi-110023 along with the compliance report in the matter

TAKE FURTHER NOTICE that in case you fail to comply with this order without lawful excuse, you will be subject to the consequences to non attendance laid down in order 16 rule 10 and order 16 rule 12 CPC...”

**NHRC directed the Madhya Pradesh Police to register an FIR against
Lakhan Singh, nephew of Bhupendra Singh.**

16. Taking cognizance of the above-mentioned letter, the NHRC issued the following order dated 10.06.2025 which is at **Annexure P-10 (Page ____ to ____)** and whose relevant extracts are as under:

“...The complainant, Rakesh Shukla, alleged that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of

stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the Police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claimed that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the Police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleged that he was threatened of killing and forced to leave his village by the accused.

Vide proceedings dated 21.03.2025, the Commission, considered the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

*Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. **The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the***

mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission and a subsequent reminder dated 09.04.2025 and a final reminder dated 23.04.2025, the authorities had not submitted any reply in the matter.

Moreover, the complainant approached the Commission on 01.05.2025 and alleged that he had not received any help from the authority so far. The complainant further alleged that the accused pressurized him and his family members to settle the case through different sources. The complainant also alleged that some unknown persons roaming around his house in the night and they are under the fear of their life. The complainant once again sought the intervention of the Commission and requested to protect his family from the accused.

Vide proceedings dated 01.05.2025, the Commission took it seriously and issued a Non-Conditional Summons to the District Magistrate and the SP, Sagar, Madhya Pradesh, u/s 13 of the Protection of Human Rights Act, 1993, to appear in person before the Commission on 08.05.2025 at 1100 hrs., in its office at Manav Adhikar Bhawan, C-Block, GPO Complex, INA, New Delhi, along with the compliance report in the matter, so far. The Authorities were also directed to ensure the safety of the victim and his family.

Pursuant to the directions of the Commission, no authority appeared before the Commission on 08.05.2025. However, a communication has

been received from the Supdt. of Police, Sagar, MP dated 08.05.2025. The authority stated that due to administrative reasons and arrangements in the state, they requested to grant 15 day time to file report to the Commission.

The Commission had considered the request of SP, Sagar, and granted 15 days' time. The authorities were directed to file the reply within two weeks for perusal of the Commission.

Pursuant to the directions of the Commission dated 15.05.2025, the SP, Sagar, MP dated 03.06.2025 has submitted its reports, wherein it is stated that they had registered PS Khurai, FIR No.186/2025 dated 29.04.2025, u/s 356(1), 308(2),308(3) BNS against the accused in the matter.

The Commission had considered the material placed on record. Having perused the report, the Commission, in the interest of fairness and equity, considers it appropriate to invite comments from the complainant.

Therefore, let a copy of the report of the the SP, Sagar, MP dated 03.06.2025, be transmitted to the complainant, who may submit his/her comments within four weeks positively.

In case the complainant fails to furnish comments within the stipulated time period of 4 weeks, it shall be deemed that the

complainant has nothing further to say in the matter and then the Commission shall deal with the case on merits...”

FIR registered against the Petitioner No.2 for press conference;

Even protests are stopped by threats of arrest

Petitioner No.2 Anshul Parihar a social worker and Ex Secretary of the congress party after hearing the ordeal faced by the victim and his father (Petitioner No.1) decided to raise the issue to ensure that FIRs are registered against the accused and compensation be provided to the petitioner and his family organized a press conference on 25.04.2025 with Petitioner No.1 the father of the victim to share the ordeal of the boy to the word. The Video tape of the press conference is annexed as **Annexure P-11 (Page ____)** . Pursuant to the press conference FIR 186/2025 dated 30.04.2025 was registered against the Petitioner no.2 which is at **Annexure P-12 (Page ____ to ____)** and whose relevant extracts are as under:

*“I am a resident of Acharya Vidyasagar Ward, Khurai, and **currently hold the position of President in the BJP Nagar Mandal.** On 29.04.2025, between 11:00 AM and 05:00 PM, Anshul Parihar, a resident of Burai, conducted a press conference in which he tarnished and attempted to harm the clean public image of the Hon’ble Former Minister and MLA Shri Bhupendra Singh Ji, and later shared the same on social media. I hereby submit this application requesting that necessary legal action be taken. From the contents of the application, offences under Sections 356(A), 308(2), and 308(3) of the BNS (Bharatiya Nyaya Sanhita) are found to be made out, and therefore, a criminal case has been registered against the non-applicant, Anshul Parihar, and taken up for investigation. A copy of the application is as follows “To, the SHO Police Station Khurai, District Sagar (M.P.),*

Subject: - Request for legal action against Anshul Singh Parihar, resident of Burai. Respected Sir, I respectfully submit the following request before you-

1) Hon'ble Shri Bhupendra Singh is the respected elected Member of the Legislative Assembly (MLA) from Khurai Constituency, representing the Bharatiya Janata Party (BJP). He has also previously held ministerial positions in key departments of the State Government. (2.) Since the year 2013, Hon'ble Bhupendra Singh Ji has made remarkable contributions toward the development of Madhya Pradesh, Khurai Assembly Constituency, and Burai town. Due to his efforts, continuous development work is being carried out in the Khurai Assembly area, which is being appreciated across the state. Thus, he is regarded as a popular and clean-image public representative throughout the state. (3.) That on 29th April 2025, an attempt was made to tarnish his clean image by organizing a press conference. It is important to state that Hon'ble MLA Shri Bhupendra Singh is not operating any crusher in the Burai region, nor is he providing protection to any such operation. Despite this, Anshul Parihar, a resident of Khurai, during the press conference on 29th April 2025, falsely alleged that Bhupendra Singh is responsible for the electrocution of a minor named Manas Shukla due to contact with a high-tension power line at a crusher. This act, clearly stemming from political conspiracy and malicious intent, and based on fabricated and misleading facts, was deliberately published with the intention of gaining unlawful advantage and damaging the reputation of the Hon'ble MLA. This highlights that Anshul Parihar has committed this illegal act intentionally and with ulterior motives. (4.) That, the alleged incident is being reported to have occurred in January 2025. The fact that such an incident is being brought to light for the first time after nearly four (04) months is highly surprising and clearly indicates political conspiracy and manipulation. (5.) That on 29th April 2025, Anshul Parihar, resident of Khurai, during a press conference, made a false statement alleging that the

Hon'ble MLA from Khurai, Shri Bhupendra Singh Ji, was responsible for the alleged incident. In doing so, he has caused harm to the reputation of the Hon'ble BJP MLA and has committed the offense of unauthorized defamation and character assassination. (6.) That on the said date, through the press conference, false and misleading statements were made against Hon'ble BJP MLA Shri Bhupendra Singh Ji with the malicious intent to defame him and obtain unlawful personal gain. These statements were subsequently published in various newspapers across the state, thereby damaging the clean public image of the Hon'ble MLA, which constitutes a clear act of defamation and malicious political intent. (7.) That, on 29th April 2025, Anshul Parihar issued threats to falsely implicate Hon'ble BJP MLA from Khurai, Shri Bhupendra Singh Ji, by making baseless and fabricated allegations. It is also essential to investigate who else is involved in this conspiracy along with Anshul Parihar. Therefore, it is humbly requested that an FIR be registered against Anshul Parihar and all individuals involved in this conspiracy, and strict legal action be taken against them. Date:- 30.04.2025, Signature- Applicant (Signature illegible in English) Supporting Members- Jamunaprasad, Saubhagya Singh, Suratsingh Pipariya, Omprakash Ghaurat, Premnarayan Mudri, Munna Singh, Rajpal Singh (Mandal President, Dhanaura), Ravindra Singh Rajput (Gramin Mandal President), Rajabhai Thakur, Narendra Dwivedi, Praveen Jain, Pramod Soni, Mukesh Adivasi, Saurabh Nema, Rahul Baharpur, Mahendra Rajak, Gaurav Rai, Jagdish Ahirwar, Rishabh Rai, Akash Parihar, Swapnil Agrawal, Jitendra Singh Dhanaura, Balram Yadav, Nannibai Ahirwar (Municipal Council President), Randhir Thakur, Rashmi Soni (Mahila Morcha President), Neetu Ajmani, Archana Jain, Nipa Nagdev, Vinita Saur, Councillor Harishankar Kushwaha, Kashiram Ahirwar, Rajendra Yadav and others."

Urgent need of intervention and protection of this Hon'ble Court

17. Bhupendra Singh, the MLA of Khurai and former Home Minister of Madhya Pradesh, wields significant political influence in the region. The other individual named in the complaint submitted to the NHRC, Lakhan Singh, is the owner of a stone crusher. The petitioner's son lost his hand due to the criminal negligence and illegal mining activities carried out by Lakhan Singh.
18. Since the petitioner attempted to file an FIR, the family has faced continuous intimidation and harassment. Despite multiple letters and directions issued by the NHRC, no FIR has been registered against the accused, nor has any compensation been granted to the minor victim, who has been left permanently disabled.
19. No action has been taken against Lakhan Singh, who continues to illegally dump crushed stone from his mine alongside public roads, posing a serious safety hazard to villagers. Individuals like Petitioner No. 2, Anshul Parihar, who have supported the victim's family in their pursuit of justice, have also been subjected to pressure and threats by authorities and anti-social elements aligned with Bhupendra Singh and Lakhan Singh.
20. Instead of initiating legal action against Lakhan Singh, the police registered FIR No. 186/2025 against Petitioner No. 2, who is now being actively pursued for arrest. Both petitioners have also received death threats, underscoring the urgent need for this Hon'ble Court's intervention.

LIST OF DATES AND EVENTS

DATE	PARTICULARS
01.01.2025	The Son of Petitioner No.1 Manas Shukla, while playing in the village Khurai with his friends, climbed an illegal pile of stones behind one of the playgrounds to secure a ball and came into contact with a high-tension electric wire, suffering severe injuries. He was rushed to the hospital, where doctors managed to save his life, but one of his hands had to be amputated and other parts of his body also sustained serious injuries.
03.01.2025	The Petitioner No.1 the father of the Victim Manas Shukla, went pillar to post to register an FIR against Lakhan Singh who is the owner of the Stone Crusher and Bhupendra Singh the MLA of District Khurai, Madhya Pradesh under whose protection the illegal mining activity is conducted for Criminal Negligence and for compensation for the injury suffered by his son. However the Police refused to register a FIR against the accused and threatened the Petitioner to not pursue this matter. Furthermore the petitioner received various death threats for pursuing the matter
March 2025	Petitioner No.1 filed a complaint with the NHRC regarding the serious injury caused to his son Manas Shukla after climbing a pile of crushed stone near an illegal crusher and mineral storage site run by MLA Khurai Bhupendra Singh and his nephew Lakhan Singh
21.03.2025	NHRC took cognizance of the complaint filed by the Petitioner and directed the Superintendent of Police Madhya Pradesh and DM district Sagar to file action taken report, additionally they were directed to provide immediate interim relief to the victim Manas Shukla and ensure proper treatment including an artificial hand transplant, SP District Khurai Sagar, Madhya Pradesh was directed to register FIR against the named accused Bhupendra Singh and Lakhan Singh. District Magistrate, Sagar was directed to take necessary steps, in accordance with applicable laws to either close or relocate the mining site away

	from the residential area to prevent further harm to the residents.
09.04.2025	Despite the directions issued on 21.03.2025 by the NHRC the authorities had no submitted the requisite reports in the matter and thus the commission directed its registry to issue a reminder to the DM and SP District Khurai Madhya Pradesh for submitting requisite report within a period of seven days failing which the commission would be constrained to invoke its coercive power u/s 13 of the PFR Act, 1993.
11.04.2025	Petitioner No.1 wrote a letter to the DM and SP Sagar District Madhya Pradesh to comply with the directions of the NHRC and how undue pressure has been exerted on the petitioner Applicant family to leave Khurai
23.04.2025	The NHRC took a serious note that despite directions dated 21.03.2025 of the commission and subsequent reminder on 09.04.2025, the authorities had not submitted the requisite reports in the matter. The registry of NHRC was directed to issue a final reminder to the DM and SP of Sagar Madhya Pradesh for submission of the requisite reports in the matter.
25.04.2025	The Petitioner No.1 the father of the victim and Petitioner No.2 Anshul Parihar a social worker and Ex secretary of the Congress Party organized a press conference to share the ordeal of the family with the world.
30.04.2025	FIR 186/2025 was registered against the Petitioner No.2 on the basis of a complaint made by the Ward President of BJP Khurai for participating and organizing the press conference on 25.04.2025
01.05.2025	Petitioner No.1 has written a letter pursuant to the directions of the NHRC, detailing the threats received by them, the registration of an FIR against Petitioner No.2, and the pressure exerted on him to reach a compromise.
09.05.2025	Despite three letters from the NHRC and numerous representations by the petitioner, the DM and SP of Sagar district failed to take any action against the accused and were

	therefore on 29.05.2025 NHRC summoned the DM an SP Sagar to appear personally before the NHRC.
03.06.2025	The Superintendent of Police Sagar filed a reply to the aforementioned complaint to the NHRC shifting the entire blame on Petitioner No.2
10.06.2025	In the aforementioned matter the NHRC passed an order to comply with the earlier directions of the NHRC in this matter and register an FIR against the named accused, provide relief to the victim, and either closure or relocation of the illegal storage of the mining site away from the residential area to prevent any further harm to the residents.
09.07.2025	Petitioner filed its comments with the NHRC
	Hence this Present Writ Petition

IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION

WRIT PETITION (Criminal) No. _____ OF 2025

(Under Article 32 of the Indian Constitution)

Rakesh Shukla and Anr

...Petitioner

Versus

State of Madhya Pradesh & Ors

...Respondents

BETWEEN

Sl.No	Particulars	Before this Hon'ble Court
1.	Rakesh Shukla S/o Shri Suraj Prasad, Aged 37 Years R/o Suraj Prasad Houe No: 202 , gram Bardha, Bina Station, Bardha Sagar, Madhya Pradesh - 470113	Petitioner No.1
2.	Anshul Singh Parihar S/o Shri Kailash Singh Parihar , Aged 37 Years, R/o House No.1, Near Sai Mandir, Taigor ward, Khurai, Sagar, Madhya Pradesh 470117	Petitioner No.2
Versus		
1.	The State of Madhya Pradesh Through it's Chief Secretary At Mantralaya Vallabh Bhawan, Bhopal,Madhya Pradesh - 4620041	Respondent No.1
2.	Superintendent of Police District Sagar Madhya Pradesh	Respondent No.2

3.	District Magistrate District Sagar Madhya Pradesh	Respondent No.3
4.	Bhupendra Singh Bamora P.O- Gambhirya, The. Sagar, District – Sagar- 470111, Madhya Pradesh	Respondent No.4
5.	Lakhan Singh Bamora P.O- Gambhirya, The. Sagar, District – Sagar- 470111, Madhya Pradesh	Respondent No.5
6.	National Human Rights Commission Through its Secretary General Manav Adhikar Bhawan, Block-C, GPO Complex, INA New Delhi - 110023	Respondent No.6
7.		Respondent No.7
8.		Respondent No.8

TO,
THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUDGES OF INDIA
SUPREME COURT OF INDIA

THE WRIT PETITION OF THE
PETITIONERS ABOVEMENTIONED

IT IS MOST RESPECTFULLY SHOWETH:

Child electrocuted and disabled for life

1. The present writ petition under Article 32 of the Constitution is filed by Petitioner No. 1, father of Manas Shukla, a minor who suffered 70% disability after being electrocuted by a high-tension wire. The incident occurred when the child climbed an illegally dumped heap of crushed stone behind a playground in Khurai, Madhya Pradesh to secure his ball, The illegal pile of crushed stone was placed by Lakhan Singh, owner of an unauthorized mining operation and nephew of Bhupendra Singh, ex-Cabinet Minister and sitting MLA of district Khurai Madhya Pradesh.

NHRC order not obeyed

2. Despite directions from the National Human Rights Commission to register an FIR against Lakhan and Bhupendra Singh, provide relief to the victim, and to either close or relocate the mine from the residential areas , authorities have failed to act. Instead, Petitioners face death threats and harassment by the authorities, A False criminal case has also been filed against Petitioner No. 2.

Person responsible terrorising the area

Death threats given: Life threatening to go to High Court

3. Due to Bhupendra Singh's political clout, securing legal assistance in the state of Madhya Pradesh has become nearly impossible. Fearing for their safety and in urgent need of support for their disabled child and implementation of the direction of the NHRC The Petitioners seek the intervention and protection of this Hon'ble Court.
4. In despair, the petitioner wrote a letter dated 11.04.2025 to the District Magistrate and Superintendent of Police, District Sagar, which is at **Annexure P-1(Page ____ to ____)** whose relevant extracts are as under:

“The petitioner/applicant, Rakesh Shukla, respectfully submits that despite the grave incident that occurred with my son Manas Shukla on 01.01.2025, no action was taken by the local administration or police authorities. On the contrary, under the influence of MLA Bhupendra Singh, undue pressure was exerted on the petitioner/applicant's family to leave Khurai and relocate elsewhere. As a result, the petitioner/applicant submitted a detailed complaint (Annexure– 2) before the National Human Rights Commission, regarding the said incident.

Despite the clear directions issued by the Hon'ble National Human Rights Commission on 21.03.2025 to take appropriate action in the

subject matter, even after the lapse of nearly 20 days, neither of you (Respected Authorities at Serial No. 1 and 2) have taken any action against MLA Bhupendra Singh and his close relative Mr. Lakhan Singh, nor has the assistance as directed been provided, whereas the Hon'ble National Human Rights Commission had ordered to take action within 10 days.

Therefore, the humble request is made to your good offices to kindly take immediate and necessary action in accordance with the enclosed order dated 21.03.2025, so that the human rights of the petitioner/applicant, his family, and his seriously injured son Manas Shukla may be duly protected, and appropriate legal proceedings may also be initiated without delay against the accused persons.”

5. The Petitioner also mentioned about the death threats received by him and his family in the complaint filed by him to the NHRC which is at **Annexure P-2 (Page __ to__)** and whose relevant extracts are as under:

.... When I approached the Superintendent of Police, Sagar, regarding the matter, I was intercepted on the way and was threatened with death. Additionally, I was threatened that neither I nor my family would be allowed to reside in Bardha ...

6. The Petitioner wrote another letter dated 01.05.2025 to the NHRC which is at **Annexure P-3 (Page __ to__)** about the continuous threats received by the victim's family whose relevant extracts are as under:

“I had made a complaint regarding the incident that happened with my son Manas Shukla on 01/01/2025, whose case number is 529/12/37/2025. No cognizance has been taken in the said complaint till now. Neither I nor my child have received any help from the government, district administration, against which I presented my sorrowful pain before the media along with our area leader Anshul Parihar ji. After the said press conference, a false FIR was lodged against Anshul Parihar by MLA Bhupendra Singh and his nephew Lakhan Singh and currently my house and my family members are also being pressured to compromise with different people. No action is being taken by the police either and many people are roaming around my house at night. After presenting my matter before the media, I am in great danger to my life and my child is also being harassed.

So I humbly request you with folded hands to help me and instruct strict action against the current Khurai MLA and his nephew and his goons and save my life. I request you and the district administration to take action as soon as possible.”

Illegal piles of mined stones next to road in the village of Khurai, Madhya Pradesh big hazard for public: Police and authorities can't intervene because of protection from Ex Cabinet Minister Bhupendra Singh

7. Respondent No. ____, Lakhan Singh, operates a mining business in Khurai village, Madhya Pradesh. The mine illegally stores mined stone along village roads, posing a serious safety hazard to the public. Police and other authorities

have failed to intervene or remove the stone piles due to the protection afforded by former Cabinet Minister Bhupendra Singh. Photographs of the piled stone from the stone crusher are as under:



The petitioner's son, while playing in the village, climbed the heap of stones, came into contact with High tension electric wire, was electrocuted, left permanently disabled.

8. The on 01.01.2025 petitioner's son, while playing in the village khurai with his friends, climbed an illegal pile of stones behind one of the playgrounds to secure a ball and came into contact with a high-tension electric wire, suffering severe injuries. He was rushed to the hospital, where doctors managed to save his life, but one of his hands had to be amputated and other parts of his body also sustained serious injuries. The permanent disability certificate of the petitioner's son, Manas Shukla, is annexed at **Annexure P-4 (Page ___to___)**. Photographs of the injuries suffered by Manas Shukla is at **Annexure P-5 (Page ___ to___)** and are as under:



Madhya Pradesh Police refuses to register FIR against the owners of the Stone Crusher: Protects Lakhan Singh the nephew of Bhupendra Singh

9. The Petitioner the father of the Victim, went pillar to post to register an FIR against Lakhan Singh who is the owner of the Stone Crusher and Bhupendra Singh the MLA of District Khurai, Madhya Pradesh under whose protection the illegal mining activity is conducted for Criminal Negligence and for compensation for the injury suffered by his son. However, the police refused to register an FIR against the accused and threatened the petitioner to not pursue this matter. The Petitioner received various death threats for pursuing the matter.

Intimidation, No FIR, No Compensation: The Petitioner Writes to the NHRC

10. The Petitioner No.1 wrote to the NHRC whose relevant extracts are as under:

“..Lakhan Singh Thakur, who is actively involved in local political activities, and under the protection of MLA Bhupendra Singh Thakur (Khurai), illegal mining material (gravel) is being stockpiled and stored on a public road in Village Wardha. This public road is a government-recognized common access route, vital for the daily movement of all villagers. On this path, illegal mineral stockpiling in the form of large gravel mounds has been carried out. These gravel heaps have been piled to such a height that only about 1.5 to 2 feet of clearance remains below the high-tension electricity line installed by the electricity department. Right next to these dangerous piles lies an open playground frequently used by local children. Also nearby is a

cow shelter (gaushala), due to which many villagers, including people from nearly 20 surrounding villages, use this route daily. **The illegal crusher operations and storage of gravel are allegedly being carried out by MLA Bhupendra Singh Thakur, his nephew Lakhan Singh Thakur, and their associates.** This activity is being conducted without adherence to any safety standards, and no warning signs, barriers, or public notices have been placed to alert the public about the risk to life in this area. As a result, common people frequently pass through this area without restriction. In this context, on 01/01/2025, **my minor son Manas Shukla was playing in the open ground adjacent to the area where illegal gravel stockpiling had been carried out on the public path due to illegal mining operations.** The gravel mound had been piled so high that only about 1.5 to 2 feet of clearance remained below the high-tension power line of the electricity department. **While playing, my son climbed the gravel heap to retrieve a ball and came into contact with the high-tension power line. As a result, his entire body was severely burned, and during treatment, his hand had to be amputated.** This tragic incident was extremely serious and life-threatening; **had proper medical attention not been given in time, my son could have lost his life.** Though my son survived, he has now **become permanently disabled due to the loss of his hand, and his life continues to remain at risk, with ongoing medical treatment. This entire incident occurred solely due to the illegal gravel stockpiling conducted by MLA Bhupendra Singh Thakur and his nephew Lakhan Thakur.** Both individuals are directly responsible and accountable for this incident and must be held liable.

*Since the said crusher is operating in violation of the Mineral Storage Rules of the Government of Madhya Pradesh, the incident has occurred as a result. Moreover, **the crusher is being operated over an area exceeding the allotted land, which has directly led to the occurrence of the said incident.***

*Following the incident involving my son, Manas Shukla, on 01/01/2025, he was taken to the primary health center at Bina for medical treatment. Due to the severity of his condition, he was referred to Sagar Hospital for further treatment. As the child was battling for his life in extremely critical condition, he was admitted to Bhagyodaya Hospital for advanced care. **At both medical facilities, due to the critical state of the child, the police station and nearby police station were duly informed. However, despite the notification, no statements were recorded. Even though the applicant had provided information about the incident through the hospital's initial medical report signed by the attending doctor and submitted to Bina Police Station, neither the dying declaration of the child was recorded nor the statements of the parents were taken.***

I went to report the said incident, but even there, no report is being registered. Due to the involvement of the Khurai MLA and his nephew, Lakhan Singh Thakur, in the operation of the crusher, the report is not being filed.

In light of these circumstances, and due to my financial condition, I am humbly submitting this application before Your Honour so that

action may be taken against them. Hon'ble Sir, this application is also being submitted because whenever I go to the police station to file a report, the information regarding the incident is conveyed to Bhupendra Singh Thakur, the MLA, and Lakhan Singh, thereby preventing any legal action from being taken by the applicant against them. When I approached the Superintendent of Police, Sagar, regarding the matter, I was intercepted on the way and was threatened with death. Additionally, I was threatened that neither I nor my family would be allowed to reside in Bardha.

This application is being submitted with the hope that if any untoward incident occurs with me or my family, then the Khurai MLA Bhupendra Singh Thakur and his nephew Lakhan Singh Thakur, who, due to their political dominance, hold considerable influence and fear in the entire Khurai region shall be held responsible.

Therefore, I humbly request you to kindly initiate strict legal action against Mr. Lakhan Singh Thakur and Mr. Bhupendra Singh Thakur, MLA of Khurai, under whose supervision the said crusher is being operated, so that justice may be served to us poor and helpless people..."

NHRC took cognizance of the complaint

Directed to register FIR, provide compensation and shut down mine

11. Taking cognizance of the petitioner's application, the **NHRC** through letter dated 21.03.2025, 09.04.2025, 23.04.2025 and order dated 13.06.2025 directed as under:

i. District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant.

ii. The Superintendent of Police, Sagar, Madhya Pradesh, directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals Lakhan Singh and Bhupendra Singh.

iii. The District Magistrate, Sagar directed to take the necessary steps, in accordance with applicable laws, to either close relocate the mining site away from the residential area to prevent further harm to the resident.

12. Letter dated 21.03.2025 to the NHRC by the petitioner is at **Annexure P-6** (Page ____ to ____) and is as under:

"The complainant, Rakesh Shukla, alleges that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones

near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the police and providing medical certificates, *no action was taken due to the political influence of the Thakur family. The complainant claims that the illegal operation violated mining and safety laws and was directly responsible for his son's injury.* Despite efforts to file a report, the police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleges that he was threatened with death and forced to leave his village by the accused.

The Commission, recognizing the gravity of the situation, has deemed the allegations as a serious violation of human rights. Consequently, it has directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.

Additionally, the Commission directs the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, is hereby directed *to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals.* Moreover, the *District Magistrate, Sagar is directed to take the necessary steps, in accordance with applicable laws, to either*

close relocate the mining site away from the residential area to prevent further harm to the residents”

13. On failure of the SP and DM to file ATR to the NHRC in pursuance of the 21.03.2025 letter the NHRC wrote a follow up letter dated 09.04.2025 which is at **Annexure P-7 (Page ____ to ____)** and whose relevant extracts are as under:

*“....Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, **it had directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.***

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of Seven days, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993”

- 14.Despite two earlier letters from the NHRC and one from the petitioner, and the failure to take any action against the accused, the NHRC issued a third letter granting the SP and DM final opportunity to file ATR. Letter dated 23.04.2025, which is at **Annexure P-8 (Page ____to____)** and whose relevant extracts are as under:

“ ...

Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close

or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission and a subsequent reminder 09.04.2025, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a final reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of two weeks, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993”

Summons issued against DM and SP of Sagar district for failing to submit the ATR and for personal appearance before the NHRC.

15.Despite three letters from the NHRC and numerous representations by the petitioner, the DM and SP of Sagar district failed to take any action against the accused and were therefore summoned to appear personally before the NHRC. Summon dated 09.05.2025 is at **Annexure P-9 (Page __ to__)** and the relevant extracts are as under:

“...WHEREAS, in the aforesaid matter the Commission had asked to submit action taken report within Ten Days and the said directions were conveyed you on 21.03.2025 (copy Enclosed)

AND WHEREAS, you have without lawful excuse failed to submit the requisite report in the matter within the prescribed time, despite reminders dated 09.04.2025 and 23.04.2025 (copies enclosed)

AND WHEREAS, the Commission further considered the matter on 01.05.2025 when it took very serious view and directed that summons be issued requiring your presence the Commission th the report

NOW THEREFORE, you are hereby directed to appear in person before the Commission on 05.2025 at 11.00 hrs in its office at Manav Adhikar Bhawan, Block-C, GPO Complex, INA, w Delhi-110023 along with the compliance report in the matter

TAKE FURTHER NOTICE that in case your fa to comply with this order without lawful use, you will be subject to the consequences to non attendance laid down in order 16 rule 10 and er 16 rule 12 CPC...”

**NHRC directed the Madhya Pradesh Police to register an FIR against
Lakhan Singh, nephew of Bhupendra Singh.**

16.Taking cognizance of the above-mentioned letter, the NHRC issued the following order dated 10.06.2025 which is at **Annexure P-10 (Page ____ to____)** and whose relevant extracts are as under:

“...The complainant, Rakesh Shukla, alleged that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the

*amputation of his hand. Despite reporting the incident to the Police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claimed that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. **Despite efforts to file a report, the Police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleged that he was threatened of killing and forced to leave his village by the accused.***

Vide proceedings dated 21.03.2025, the Commission, considered the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

*Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. **The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.***

Despite directions of the Commission and a subsequent reminder dated 09.04.2025 and a final reminder dated 23.04.2025, the authorities had not submitted any reply in the matter.

Moreover, the complainant approached the Commission on 01.05.2025 and alleged that he had not received any help from the authority so far. The complainant further alleged that the accused pressurized him and his family members to settle the case through different sources. The complainant also alleged that some unknown persons roaming around his house in the night and they are under the fear of their life. The complainant once again sought the intervention of the Commission and requested to protect his family from the accused.

Vide proceedings dated 01.05.2025, the Commission took it seriously and issued a Non-Conditional Summons to the District Magistrate and the SP, Sagar, Madhya Pradesh, u/s 13 of the Protection of Human Rights Act, 1993, to appear in person before the Commission on 08.05.2025 at 1100 hrs., in its office at Manav Adhikar Bhawan, C-Block, GPO Complex, INA, New Delhi, along with the compliance report in the matter, so far. The Authorities were also directed to ensure the safety of the victim and his family.

Pursuant to the directions of the Commission, no authority appeared before the Commission on 08.05.2025. However, a communication has been received from the Supdt. of Police, Sagar, MP dated 08.05.2025. The authority stated that due to administrative reasons

and arrangements in the state, they requested to grant 15 day time to file report to the Commission.

The Commission had considered the request of SP, Sagar, and granted 15 days' time. The authorities were directed to file the reply within two weeks for perusal of the Commission.

Pursuant to the directions of the Commission dated 15.05.2025, the SP, Sagar, MP dated 03.06.2025 has submitted its reports, wherein it is stated that they had registered PS Khurai, FIR No.186/2025 dated 29.04.2025, u/s 356(1), 308(2),308(3) BNS against the accused in the matter.

The Commission had considered the material placed on record. Having perused the report, the Commission, in the interest of fairness and equity, considers it appropriate to invite comments from the complainant.

Therefore, let a copy of the report of the the SP, Sagar, MP dated 03.06.2025, be transmitted to the complainant, who may submit his/her comments within four weeks positively.

In case the complainant fails to furnish comments within the stipulated time period of 4 weeks, it shall be deemed that the complainant has nothing further to say in the matter and then the Commission shall deal with the case on merits... ”

FIR registered against the Petitioner No.2 for press conference;

Even protests are stopped by threats of arrest

17. Petitioner No.2 Anshul Parihar a social worker and Ex Secretary of the congress party after hearing the ordeal faced by the victim and his father (Petitioner No.1) decided to raise the issue to ensure that FIRs are registered against the accused and compensation be provided to the petitioner and his family organized a press conference on 25.04.2025 with Petitioner No.1 the father of the victim to share the ordeal of the boy to the word. The Video tape of the press conference is annexed as **Annexure P-11 (Page____)** . Pursuant to the press conference FIR 186/2025 dated 30.04.2025 was registered against the Petitioner no.2 which is at **Annexure P-12 (Page ____ to____)** and whose relevant extracts are as under:

*“I am a resident of Acharya Vidyasagar Ward, Khurai, and **currently hold the position of President in the BJP Nagar Mandal.** On 29.04.2025, between 11:00 AM and 05:00 PM, Anshul Parihar, a resident of Burai, conducted a press conference in which he tarnished and attempted to harm the clean public image of the Hon’ble Former Minister and MLA Shri Bhupendra Singh Ji, and later shared the same on social media. I hereby submit this application requesting that necessary legal action be taken. From the contents of the application, offences under Sections 356(A), 308(2), and 308(3) of the BNS (Bharatiya Nyaya Sanhita) are found to be made out, and therefore, a criminal case has been registered against the non-applicant, Anshul Parihar, and taken up for investigation. A copy of the application is as follows “To, the SHO Police Station Khurai, District Sagar (M.P.), Subject: - Request for legal action against Anshul Singh Parihar, resident of Burai. Respected Sir, I respectfully submit the following request*

before you- 1) Hon'ble Shri Bhupendra Singh is the respected elected Member of the Legislative Assembly (MLA) from Khurai Constituency, representing the Bharatiya Janata Party (BJP). He has also previously held ministerial positions in key departments of the State Government. (2.) Since the year 2013, Hon'ble Bhupendra Singh Ji has made remarkable contributions toward the development of Madhya Pradesh, Khurai Assembly Constituency, and Burai town. Due to his efforts, continuous development work is being carried out in the Khurai Assembly area, which is being appreciated across the state. Thus, he is regarded as a popular and clean-image public representative throughout the state. (3.) That on 29th April 2025, an attempt was made to tarnish his clean image by organizing a press conference. It is important to state that Hon'ble MLA Shri Bhupendra Singh is not operating any crusher in the Burai region, nor is he providing protection to any such operation. Despite this, Anshul Parihar, a resident of Khurai, during the press conference on 29th April 2025, falsely alleged that Bhupendra Singh is responsible for the electrocution of a minor named Manas Shukla due to contact with a high-tension power line at a crusher. This act, clearly stemming from political conspiracy and malicious intent, and based on fabricated and misleading facts, was deliberately published with the intention of gaining unlawful advantage and damaging the reputation of the Hon'ble MLA. This highlights that Anshul Parihar has committed this illegal act intentionally and with ulterior motives. (4.) That, the alleged incident is being reported to have occurred in January 2025. The fact that such an incident is being brought to light for the first time after nearly four (04) months is highly surprising and clearly indicates political conspiracy and manipulation. (5.) That on 29th April 2025, Anshul Parihar, resident of Khurai, during a press conference, made a false statement alleging that the Hon'ble MLA from Khurai, Shri Bhupendra Singh Ji, was responsible for the alleged incident. In doing so, he has caused harm to the

reputation of the Hon'ble BJP MLA and has committed the offense of unauthorized defamation and character assassination. (6.) That on the said date, through the press conference, false and misleading statements were made against Hon'ble BJP MLA Shri Bhupendra Singh Ji with the malicious intent to defame him and obtain unlawful personal gain. These statements were subsequently published in various newspapers across the state, thereby damaging the clean public image of the Hon'ble MLA, which constitutes a clear act of defamation and malicious political intent. (7.) That, on 29th April 2025, Anshul Parihar issued threats to falsely implicate Hon'ble BJP MLA from Khurai, Shri Bhupendra Singh Ji, by making baseless and fabricated allegations. It is also essential to investigate who else is involved in this conspiracy along with Anshul Parihar. Therefore, it is humbly requested that an FIR be registered against Anshul Parihar and all individuals involved in this conspiracy, and strict legal action be taken against them. Date:- 30.04.2025, Signature- Applicant (Signature illegible in English) Supporting Members- Jamunaprasad, Saubhagya Singh, Suratsingh Pipariya, Omprakash Ghaurat, Premnarayan Mudri, Munna Singh, Rajpal Singh (Mandal President, Dhanaura), Ravindra Singh Rajput (Gramin Mandal President), Rajabhai Thakur, Narendra Dwivedi, Praveen Jain, Pramod Soni, Mukesh Adivasi, Saurabh Nema, Rahul Baharpur, Mahendra Rajak, Gaurav Rai, Jagdish Ahirwar, Rishabh Rai, Akash Parihar, Swapnil Agrawal, Jitendra Singh Dhanaura, Balram Yadav, Nannibai Ahirwar (Municipal Council President), Randhir Thakur, Rashmi Soni (Mahila Morcha President), Neetu Ajmani, Archana Jain, Nipa Nagdev, Vinita Saur, Councillor Harishankar Kushwaha, Kashiram Ahirwar, Rajendra Yadav and others.”

18.The Superintendent of Police District Sagar also wrote their reply dated 03.06.2025 to the NHRC complaint made by the Petitioner which is at **Annexure P-13 (Page ____ to____)**

19.The Petitioner also filed their comments dated 09.07.2025 in the NHRC proceedings which is at **Annexure P-14 (Page____ to ____)**.

Urgent need of intervention and protection of this Hon'ble Court

20.Bhupendra Singh, the MLA of Khurai and former Home Minister of Madhya Pradesh, wields significant political influence in the region. The other individual named in the complaint submitted to the NHRC, Lakhan Singh, is the owner of a stone crusher. The petitioner's son lost his hand due to the criminal negligence and illegal mining activities carried out by Lakhan Singh.

21.Since the petitioner attempted to file an FIR, the family has faced continuous intimidation and harassment. Despite multiple letters and directions issued by the NHRC, no FIR has been registered against the accused, nor has any compensation been granted to the minor victim, who has been left permanently disabled.

22.No action has been taken against Lakhan Singh, who continues to illegally dump crushed stone from his mine alongside public roads, posing a serious safety hazard to villagers. Individuals like Petitioner No. 2, Anshul Parihar, who have supported the victim's family in their pursuit of justice, have also been subjected to pressure and threats by authorities and anti-social elements aligned with Bhupendra Singh and Lakhan Singh.

23. Instead of initiating legal action against Lakhan Singh, the police registered FIR No. 186/2025 against Petitioner No. 2, who is now being actively pursued for arrest. Both petitioners have also received death threats, underscoring the urgent need for this Hon'ble Court's intervention.

24. **GROUND**S

A. **BECAUSE** The incident involving the electrocution of the minor child, Manas Shukla, due to the criminally negligent and illegal act of stockpiling gravel beneath a high-tension electric wire in a residential area, constitutes a gross violation of the minor's fundamental right to life and personal liberty under Article 21 of the Constitution. The inaction of the State machinery further compounds this violation.

B. **BECAUSE** despite specific and repeated directions by the NHRC to register an FIR, provide immediate interim relief and treatment to the victim, and relocate or shut down the hazardous mining operation, the State authorities have shown willful disregard and contemptuous non-compliance. This not only undermines the rule of law but also violates the petitioners' rights under Article 14 and 21.

C. **BECAUSE** Petitioner No. 1 has been denied the fundamental right of access to justice due to the political influence exercised by Respondent No. 2 (Bhupendra Singh), resulting in threats, intimidation, and a refusal by the police to register an FIR against the culprits. Instead, a false FIR has been

filed against Petitioner No. 2, thereby misusing state machinery to shield powerful individuals and suppress dissent.

D. **BECAUSE** the preferential treatment given to Bhupendra Singh and Lakhan Singh by the police and administrative authorities despite serious allegations and NHRC directives demonstrates arbitrariness, favoritism, and discrimination, in direct violation of Article 14.

E. **BECAUSE** The State is constitutionally mandated to protect the weaker sections of society, including children. The failure to prevent illegal mining activities and ensure a safe environment for children in the locality is a clear abdication of the State's obligations under the Directive Principles of State Policy, particularly Articles 38 and 39(e).

F. **BECAUSE** the continued operation of the unauthorized storage facility of the stone crusher in violation of mining, safety, and zoning laws, and the administration's inaction despite photographic and documentary evidence, points to state complicity or gross dereliction of duty warranting judicial intervention.

G. **BECAUSE** the consistent failure of the District Magistrate and Superintendent of Police, despite NHRC summons and repeated notices, to take any meaningful action demonstrates a breakdown of constitutional machinery at the district level. This failure justifies the invocation of the jurisdiction of this Hon'ble Court.

H. **BECAUSE** both Petitioner No. 1 and Petitioner No. 2 have been subjected to grave threats to their life and liberty, including attempts to forcibly evict them

from their homes, solely for seeking justice. Their protection under Article 21 demands urgent enforcement by this Hon'ble Court.

I. **BECAUSE** the FIR lodged against Petitioner No. 2 for holding a press conference to expose the truth and seek justice for the victim amounts to malicious prosecution and a direct assault on the right to free speech and expression. Such abuse of process to silence dissent must be condemned.

J. **BECAUSE** the Petitioner No.1 has spent more than Rs.20 lakh for the treatment of the minor son but no monetary assistance have been provided by the state of Madhya Pradesh.

25. That there is no similar petition with the similar prayers has been filed before this court or any other Court of law.

PRAYER

26. Under the facts and circumstances of this case and in the interest of justice it is most respectfully prayer that this Hon'ble Court may graciously be pleased to:

a. For a Writ/Order or direction to the respondents to comply with the NHRC directions dated 21.03.2025, 09.04.2025, 23.04.2025 and order dated 10.06.2025.

- b.** For a Writ/Order or direction to the Madhya Pradesh Police to immediately register an FIR against Lakhan Singh, Bhupendra Singh, and all others involved in the intimidation of the petitioner's family and in causing injury to the petitioner's minor son in accordance with the NHRC order.
- c.** For a Writ/Order or direction for a payment of compensation of ₹1 crore, along with medical assistance, to Manas Shukla, the son of Petitioner No. 1.
- d.** For a direction to immediately shut down the illegal mining activities being carried out in Khurai Village, Madhya Pradesh, which pose a serious threat to public safety.
- e.** For a direction to initiate disciplinary action against the Superintendent of Police and the District Magistrate of Sagar District for their failure to comply with the orders of the NHRC and for the victimization of the petitioners and their family.
- f.** Any Other Writ, Order or Direction this Hon'ble Court deems fit in the present facts and circumstances in the interest of Justice.

Place: New Delhi
'Date: 19.07.2025

Satya Mitra
AOR of The Petitioner

IN THE SUPREME COURT OF INDIA

Criminal Original Jurisdiction

Writ Petition (Crl) No. _____ of 2025

(Under Article 32 of The Constitution of India)

In the Matter of:

Rakesh Shukla & Anr

...Petitioner

Versus

The State of Madhya Pradesh & Ors

...Respondents

AFFIDAVIT

I, Rakesh Shukla S/o Shri Suraj Prasad, Aged 37 Years, R/O Suraj Prasad House number 202, graam Bardha, Bina Station, Bardha Sagar, Madhya Pradesh - 470113, presently residing in Bhopal, Madhya Pradesh, do hereby solemnly state on oath as under:

1. That, I am the petitioner in the abovementioned case and I am well conversant with the facts and circumstances of the case and as such I am competent and authorized to swear this affidavit on behalf of myself.
2. That I have understood the concept of the synopsis and list of dates from page _____ to _____ and the petition from Paragraphs _____ to _____ at page _____ to _____ along with the contents of the accompanying applications and state that the same were explained to me in the vernacular language know to me and are being filed under my



रकेश शुक्ला

instructions and the contents thereof are true and correct to the best of my knowledge and nothing material has been concealed herein.

3. That I have gone through the content of the Petition and the accompanying applications and state that the contents of the same are correct and true to best of my knowledge.
4. That the Annexures to this Writ Petitions and accompanying application are the true copies of their respective originals.

राकेश शुक्ला

DEPONENT

VERIFICATION

Verified and signed at _____ this _____ day of _____ 2025. That the contents of the above affidavit are true and correct to the best of my knowledge and belief and that no part of it is false and that no material has been concealed.

राकेश शुक्ला

DEPONENT

Sworn Before me on the 9/7/2025
Shri Rakesh Shukla s/o Suraj prasad
Shri No. H. N. 202 Gurgaon, Bardha Sagar.
Do. (M.P.) who has been identified by
Shri. Mohd. Saif Uddin s/o. _____
know to me whose signature(s) is/are to appear
Serial No. 674

Sanjay Kumar Vishwakarma
Oath Commissioner For High Court
Bhopal (M.P.) 462001

IDENTIFIED BY ME

Annexure P-1

To,

1. The Hon'ble District President,
District Sagar, Madhya Pradesh
2. The Hon'ble Superintendent of Police,
District Sagar, Madhya Pradesh

Subject: Compliance with the order dated 21.03.2025 passed by the National Human Rights Commission, New Delhi in Case No. 529/12/37/2025 – regarding registration of a First Information Report against the accused Khurai MLA Shri Bhupendra Singh and Lakhan Singh; and for taking action to provide immediate interim relief, medical assistance, and prosthetic limb implantation for the petitioner's son Manas Shukla, as well as relocation of the incident site away from the residential area in accordance with the said order.

Reference:- In relation to the application submitted by the petitioner before the Hon'ble Member, National Human Rights Commission, New Delhi, concerning the subject matter of encroachment committed by the present MLA Bhupendra Singh and, under his protection, his nephew Lakhan Singh Thakur, by illegally extracting and stockpiling crushed stone from a mineral crusher installed under a high-tension electric line

adjacent to the Pradhan Mantri Awas road, thereby encroaching on the public pathway, and further, regarding initiating action in connection with the tragic fatal incident and attempted murder of the petitioner's minor son, Manas Shukla, caused as a result of the said illegal activity.

Respected Sir,

The petitioner/applicant, Rakesh Shukla, respectfully submits that despite the grave incident that occurred with his son Manas Shukla on 01.01.2025, no action was taken by the local administration or police authorities. On the contrary, under the influence of MLA Bhupendra Singh, undue pressure was exerted on the petitioner/applicant's family to leave Khurai and relocate elsewhere. As a result, the petitioner/applicant submitted a detailed complaint (Annexure- 2) before the National Human Rights Commission, regarding the said incident.

Despite the clear directions issued by the Hon'ble National Human Rights Commission on 21.03.2025 to take appropriate action in the subject matter, even after the lapse of nearly 20 days, neither of you (Respected Authorities at Serial No. 1 and 2) have taken any action against MLA Bhupendra Singh and his close relative Mr. Lakhan Singh, nor has the assistance as directed been provided,

whereas the Hon'ble National Human Rights Commission had ordered to take action within 10 days.

Therefore, the humble request is made to your good offices to kindly take immediate and necessary action in accordance with the enclosed order dated 21.03.2025, so that the human rights of the petitioner/applicant, his family, and his seriously injured son Manas Shukla may be duly protected, and appropriate legal proceedings may also be initiated without delay against the accused persons.

	Petitioner / Applicant
Sagar	SD/-
Dated- 11.04.2025	Rakesh Shukla
	S/o Shri Suraj Shukla
	R/o Village Bardha, Tehsil Khurai,
	District Sagar, Madhya Pradesh

Enclosures:-

1. Copy of the order dated 21.03.2025 passed by the Hon'ble National Human Rights Commission.
2. Copy of the application submitted by the applicant before the Hon'ble National Human Rights Commission, New Delhi.
3. Copies of medical documents of Manas Shukla, who was seriously injured.
4. Photographs related to the incident

To,
Shri Priyank Kanoongo
Member,
National Human Rights Commission
New Delhi, India

Rakesh Shukla, S/o Suraj Shukla, Age 42 years, Resident of
Village Waraya, Tehsil Khurai, District Sagar

Kalpana Shukla, W/o Rakesh Shukla, Resident of Village
Badha, Tehsil Khurai, District Sagar

.....Applicant

Subject:- Request for action regarding the illegal acts committed under
the protection of the current MLA Bhupendra Singh and his
nephew Lakhan Singh Thakur, involving illegal mining and
gravel stockpiling beneath a high-tension line adjacent to the
Pradhan Mantri Awas Yojana road, which directly resulted in
the tragic and fatal incident involving the applicant's minor son,
Manas Shukla, amounting to attempt to murder.

Respected Sir,

The applicant humbly submits the following:

I, the undersigned applicant, Rakesh Shukla, am a resident of
Village Barcha, Tehsil Khurai, while my entire family currently
resides in Village Badha. In Village Barcha, under the political

influence of Lakhan Singh Thakur, who is actively involved in local political activities, and under the protection of MLA Bhupendra Singh Thakur (Khurai), illegal mining material (gravel) is being stockpiled and stored on a public road in Village Wardha. This public road is a government-recognized common access route, vital for the daily movement of all villagers. On this path, illegal mineral stockpiling in the form of large gravel mounds has been carried out. These gravel heaps have been piled to such a height that only about 1.5 to 2 feet of clearance remains below the high-tension electricity line installed by the electricity department. Right next to these dangerous piles lies an open playground frequently used by local children. Also nearby is a cow shelter (gaushala), due to which many villagers, including people from nearly 20 surrounding villages, use this route daily. The illegal crusher operations and storage of gravel are allegedly being carried out by MLA Bhupendra Singh Thakur, his nephew Lakhan Singh Thakur, and their associates. This activity is being conducted without adherence to any safety standards, and no warning signs, barriers, or public notices have been placed to alert the public about the risk to life in this area. As a result, common people frequently pass through this area without restriction. In this context, on 01/01/2025, my minor son Manas Shukla was playing in the open ground adjacent to the area

where illegal gravel stockpiling had been carried out on the public path due to illegal mining operations. The gravel mound had been piled so high that only about 1.5 to 2 feet of clearance remained below the high-tension power line of the electricity department. While playing, my son climbed the gravel heap to retrieve a ball and came into contact with the high-tension power line. As a result, his entire body was severely burned, and during treatment, his hand had to be amputated. This tragic incident was extremely serious and life-threatening; had proper medical attention not been given in time, my son could have lost his life. Though my son survived, he has now become permanently disabled due to the loss of his hand, and his life continues to remain at risk, with ongoing medical treatment. This entire incident occurred solely due to the illegal gravel stockpiling conducted by MLA Bhupendra Singh Thakur and his nephew Lakhan Thakur. Both individuals are directly responsible and accountable for this incident and must be held liable.

Since the said crusher is operating in violation of the Mineral Storage Rules of the Government of Madhya Pradesh, the incident has occurred as a result. Moreover, the crusher is being operated over an area exceeding the allotted land, which has directly led to the occurrence of the said incident.

Following the incident involving my son, Manas Shukla, on 01/01/2025, he was taken to the primary health center at Bina for medical treatment. Due to the severity of his condition, he was referred to Sagar Hospital for further treatment. As the child was battling for his life in extremely critical condition, he was admitted to Bhagyodaya Hospital for advanced care. At both medical facilities, due to the critical state of the child, the police station and nearby police station were duly informed. However, despite the notification, no statements were recorded. Even though the applicant had provided information about the incident through the hospital's initial medical report signed by the attending doctor and submitted to Bina Police Station, neither the dying declaration of the child was recorded nor the statements of the parents were taken.

I went to report the said incident, but even there, no report is being registered. Due to the involvement of the Khurai MLA and his nephew, Lakhan Singh Thakur, in the operation of the crusher, the report is not being filed.

In light of these circumstances, and due to my financial condition, I am humbly submitting this application before Your Honour so that action may be taken against them. Hon'ble Sir, this application is also being submitted because whenever I go to the

police station to file a report, the information regarding the incident is conveyed to Bhupendra Singh Thakur, the MLA, and Lakhan Singh, thereby preventing any legal action from being taken by the applicant against them. When I approached the Superintendent of Police, Sagar, regarding the matter, I was intercepted on the way and was threatened with death. Additionally, I was threatened that neither I nor my family would be allowed to reside in Bardha.

This application is being submitted with the hope that if any untoward incident occurs with me or my family, then the Khurai MLA Bhupendra Singh Thakur and his nephew Lakhan Singh Thakur, who, due to their political dominance, hold considerable influence and fear in the entire Khurai region shall be held responsible.

Therefore, I humbly request you to kindly initiate strict legal action against Mr. Lakhan Singh Thakur and Mr. Bhupendra Singh Thakur, MLA of Khurai, under whose supervision the said crusher is being operated, so that justice may be served to us poor and helpless people.

Sagar, Dated:

Applicants

SD/-

Rakesh Shukla

Annexure P-3

Date: 01.05.2025

To:

Mr National President

National Human Rights Commission (New Delhi)

Subject: In reference to earlier Case No. 529/12/37/2025.

Sir,

I had made a complaint regarding the incident that happened with my son Manas Shukla on 01/01/2025, whose case number is 529/12/37/2025. No cognizance has been taken in the said complaint till now. Neither I nor my child have received any help from the government, district administration, against which I presented my sorrowful pain before the media along with our area leader Anshul Parihar ji. After the said press conference, a false FIR was lodged against Anshul Parihar by MLA Bhupendra Singh and his nephew Lakhan Singh and currently my house and my family members are also being pressured to compromise with different people. No action is being taken by the police either and many people are roaming around my house at night. After presenting my matter before the media, I am in great danger to my life and my child is also being harassed.

So, I humbly request you with folded hands to help me and instruct strict action against the current Khurai MLA and his nephew and his goons and save my life. I request you and the district administration to take action as soon as possible.

Thank you

Applicant Rakesh Shukla

Rakesh Shukla Father Shri Suraj Shukla

Resident Village Bardha tehsil Khurai

District Sagar Madhya Pradesh

Mobile No. 8226089794

**District Disability Rehabilitation Center, District Sagar
Hospital Campus, Sagar**

Unique Code:- 149961551/04/701

Aadhaar Number: 956699445391

Certificate Number: 5521

Date: 15/04/2025

This is to certify that we have carefully examined Mr./Ms./Miss Manas Shukla, Son/Daughter of Mr. Rakesh Shukla, Date of Birth- 01/11/2011, Age- 19 Yr. Gender- Male, Resident of: Ward/Village/Street – Karcha, Post Office – Karcha, Tehsil – Khurai, District – Sagar, State – Madhya Pradesh, whose photograph is affixed above, and we are satisfied that:-

- a) This is a case of disability. His/her permanent physical impairment/disability has been assessed according to the guidelines for evaluation of specified disabilities, and is shown in the table below:-

Sl No.	Disability	Affected Part of the Body	Disability Percentage
1	Locomotor Disability, including- Cerebral Palsy, Cured Leprosy, Dwarfism,	A/E	70 %

	Acid Attack Victim, and Muscular Dystrophy		
2	Blindness and Low Vision	Am..... (L)	
3	Deaf, Speech, and Language Disability	SoG	
4	Intellectual Disability, including specific learning disabilities	(Above E/b)	
5	Mental Illness		
6	Chronic Neurological Conditions		
7	Hemophilia, Thalassemia, Sickle Cell Disease, and		
8	Multiple Disabilities		

- b) Taking the above into consideration, his/her overall permanent physical impairment, as per the specified evaluation guidelines, is as follows:-

In figures- 70 percent, In words- Seventy percent _____

2. This condition is progressive / not progressive. There is a possibility of improvement / no possibility of improvement.
3. Reassessment of disability is not required.

This certificate shall remain valid until permanent
(date/month/year).

4. The applicant has submitted the following documents as proof of residence:-

Nature of Document	Date of Issue	Details of the Certificate issuing Authority
Aadhar Card	--	Government of India

Name and Seal of the Member

SD/-

Dr. Abhishek Thakur

M.S. Ortho

District Hospital, Sagar

Name and Seal of the Member

SD/-

Dr. Santosh Patel

M.D. Medicine

District Hospital, Sagar

M.P.M.S.-11890

Name and Seal of the Member

SD/-

Surgeon-cum-Chief Hospital Superintendent

Civil Surgeon/ Chairman

District Medical

Signature Thumb impression

of the person

Mobile No. 8435601644

Anneuxre P-5

























Annexure P-6

Case No.- 529/12/37/2025
NATIONAL HUMAN RIGHTS COMMISSION
(LAW DIVISION)

MANAV ADHIKAR BHAWAN, BLOCK-C,
G.P.O. COMPLEX, INA, NEW DELHI- 110023
Fax No. 011-24651332 Website: www.nhrc.nic.in

Date: 21/03/2025

To,
THE DISTRICT MAGISTRATE
SAGAR MADHYA PRADESH
Email- dmsagar@nic.in

THE SUPERINTENDENT OF POLICE
SP Office, Civil Line, Gopal Ganj,
SAGAR MADHYA PRADESH
470001
Email- sp_sagar@mppolice.gov.in

Sub: Complaint/Intimation from

RAKESH SHUKLA S/O SURAJ SHUKLA
VILL-VARDHA, TEHSIL-KHURAI
SAGAR, MADHYA PRADESH
0

Subject: Action Taken Report Called for(ATR) -529/12/37/2025.

Sir/Madam,

The complaint/intimation dated NA, was placed before the Commission on 21/03/2025. Upon perusing the same, the Commission directed as follows:

The complainant, Rakesh Shukla, alleges that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhon Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claims that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleges that he was threatened with death and forced to leave his village by the accused.

The Commission, recognizing the gravity of the situation, has deemed the allegations as a serious violation of human rights. Consequently, it has directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.

Additionally, the Commission directs the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, is hereby directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals. Moreover, the District Magistrate, Sagar is directed to take the necessary steps, in accordance with applicable laws, to either close & relocate the mining site away from the residential area to prevent further harm to the residents.


T. C.
Daware Singh

Annexure P-7

Action : Additional Information Called for (Action No 2)

Action Date 09-04-2025

Authority

THE DISTRICT MAGISTRATE - SAGAR MADHYA PRADESH

THE SUPERINTENDENT OF POLICE - SP Office, Civil Line, Gopal Ganj, SAGAR MADHYA PRADESH

THE CHIEF SECRETARY - 03RD FLOOR, VALLABH BHAVAN-II, GOVT. OF MADHYA PRADESH, 04TH FLOOR, MANTRALAYA, VALLABH BHAVAN MADHYA PRADESH

THE DIRECTOR GENERAL OF POLICE - POLICE HEADQUARTERS, SWAMI DAYANAND NAGAR, JAHANGIRABAD MADHYA PRADESH

Proceeding

These proceeding shall be read in continuation of earlier proceedings of the Commission.

The complainant, Rakesh Shukla, alleges that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claims that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleges that he was threatened with death and forced to leave his village by the accused.

Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate (DM) of Sagar, Madhya Pradesh, for an action taken report (ATR) within 10 days.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused individuals. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of Seven days, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993.


T. C.
Dewash Singh

Annexure P-8

Action : Additional Information Called for (Action No 3)

Action Date - 23-04-2025

Authority THE DISTRICT MAGISTRATE - SAGAR MADHYA PRADESH

, THE SUPERINTENDENT OF POLICE - SP Office, Civil Line, Gopal Ganj, SAGAR MADHYA PRADESH

, THE CHIEF SECRETARY - 03RD FLOOR, VALLABH BHAVAN-II, GOVT. OF MADHYA PRADESH, 04TH FLOOR, MANTRALAYA, VALLABH BHAVAN MADHYA PRADESH

, THE DIRECTOR GENERAL OF POLICE - POLICE HEADQUARTERS, SWAMI DAYANAND NAGAR, JAHANGIRABAD MADHYA PRADESH

Proceeding

These proceeding shall be read in continuation of earlier proceedings of the Commission.

The complainant, Rakesh Shukla, alleged that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhn Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claimed that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the Police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleged that he was threatened of killing and forced to leave his village by the accused.

Vide proceedings dated 21.03.2025, the Commission, recognized the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission and a subsequent reminder 09.04.2025, the authorities had not submitted the requisite reports in the matter.

The Commission takes it seriously and directs its registry to issue a final reminder to the District Magistrate and the Superintendent of Police, Sagar, Madhya Pradesh, for submission of a requisite report within a period of two weeks, failing which the Commission would be constrained to invoke its coercive power u/s 13 of the PHR Act, 1993

TRUE COPY


Smt. Sushma Pandey
Advocate

Annexure P-9

~~Most Immediate~~

National Human Rights Commission
Law Division (M-4 Section)

Brijvir Singh
Assistant Registrar (Law)
Phone-91-11-24663368
Email: ar4nhrc@nic.in

Manav Adhikar Bhawan,
Block 'C', GPO Complex,
INA, New Delhi-110023

SUMMONS
(Case No. 529/12/37/2025)

(The complaint related that the son of Manas Shukla on 01/01/2025 was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Trakur, the MLA of Kharai, and his nephew, Lathan Singh Thakur)

To,

✓ The District Magistrate,
District Sagar,
Madhya Pradesh-470001.

The Superintendent of Police,
Civil Line, Gopal Ganj,
District Sagar,
Madhya Pradesh-470001.

WHEREAS, in the aforesaid matter the Commission had asked to submit an action taken report within Ten Days and the said directions were conveyed to you on 21.03.2025 (copy enclosed).

AND WHEREAS, you have, without lawful excuse failed to submit the requisite report in the matter within the prescribed time, despite reminders dated 09.04.2025 and 23.04.2025 (copies enclosed).

AND WHEREAS, the Commission further considered the matter on 01.05.2025 when it took very serious view and directed that summons be issued requiring your presence in the Commission in the report.

NOW THEREFORE, you are hereby directed to appear in person before the Commission on 05.2025 at 11.00 hrs. in its office at Manav Adhikar Bhawan, Block-C, GPO Complex, INA, w Delhi-110023 alongwith the compliance report in the matter.

TAKE FURTHER NOTICE that in case you fail to comply with this order without lawful use, you will be subject to the consequences to non-attendance laid down in order 16 rule 10 and at 16 rule 12 CPC.

GIVEN UNDER MY HAND AND SEAL of the Commission this day the 21st May, 2025

As above.

BY ORDER

Assistant Registrar (Law)



Annexure P-10

National Human Rights Commission New Delhi

Case Number 529/12/37/2025
Diary Number 31468/CR/2025
Commission SHRI PRIYANK KANOONGO

Action Date 10/06/2025
Due Date 20/06/2025
Completion Date 13/06/2025

Action Comments of Complainant Called for(CCC)

Authority
Address

Complainant RAKESH SHUKLA S/O SURAJ SHUKLA
Address VILL-VARDHA, TEHSIL-KHURAI
District and State SAGAR , MADHYA PRADESH

Victim MANAS SHUKLA S/O RAKESH SHUKLA
Address VILL-VARDHA, TEHSIL-KHURAI
District and State SAGAR , MADHYA PRADESH

PROCEEDING

These proceeding shall be read in continuation of earlier proceedings of the Commission.

The complainant, Rakesh Shukla, alleged that on 01/01/2025, his son, Manas Shukla, was seriously injured after climbing a pile of stones near an illegal crusher and mineral storage site run by Bhupendra Singh Thakur, the MLA of Khurai, and his nephew, Lakhan Singh Thakur. The high-tension wire, located dangerously close to the pile, electrocuted his son, causing severe burns and the amputation of his hand. Despite reporting the incident to the Police and providing medical certificates, no action was taken due to the political influence of the Thakur family. The complainant claimed that the illegal operation violated mining and safety laws and was directly responsible for his son's injury. Despite efforts to file a report, the Police allegedly informed the Thakurs, preventing any legal proceedings. The complainant also alleged that he was threatened of killing and forced to leave his village by the accused.

Vide proceedings dated 21.03.2025, the Commission, considered the gravity of the situation, had deemed the allegations as a serious violation of human rights. Consequently, it had directed its Registry to forward the complaint to the District Magistrate, Sagar, Madhya Pradesh, for an action taken report (ATR) within two weeks.

Additionally, the Commission directed the District Magistrate, Sagar, Madhya Pradesh, to provide immediate interim relief to the victim and ensure proper treatment, including an artificial hand transplant. The Superintendent of Police, Sagar, Madhya Pradesh, was also directed to take appropriate action in accordance with the law regarding the registration of an FIR against the named

accused. Moreover, the District Magistrate, Sagar was directed to take the necessary steps, in accordance with applicable laws, to either close or relocate the mining site away from the residential area to prevent further harm to the residents.

Despite directions of the Commission and a subsequent reminder dated 09.04.2025 and a final reminder dated 23.04.2025, the authorities had not submitted any reply in the matter.

Moreover, the complainant approached the Commission on 01.05.2025 and alleged that he had not received any help from the authority so far. The complainant further alleged that the accused pressurized him and his family members to settle the case through different sources. The complainant also alleged that some unknown persons roaming around his house in the night and they are under the fear of their life. The complainant once again sought the intervention of the Commission and requested to protect his family from the accused.

Vide proceedings dated 01.05.2025, the Commission took it seriously and issued a Non-Conditional Summons to the District Magistrate and the SP, Sagar, Madhya Pradesh, u/s 13 of the Protection of Human Rights Act, 1993, to appear in person before the Commission on 08.05.2025 at 1100 hrs., in its office at Manav Adhikar Bhawan, C-Block, GPO Complex, INA, New Delhi, alongwith the compliance report in the matter, so far. The Authorities were also directed to ensure the safety of the victim and his family.

Pursuant to the directions of the Commission, no authority appeared before the Commission on 08.05.2025. However, a communication has been received from the Supdt. of Police, Sagar, MP dated 08.05.2025. The authority stated that due to administrative reasons and arrangements in the state, they requested to grant 15 days time to file report to the Commission.

The Commission had considered the request of SP, Sagar, and granted 15 days time. The authorities were directed to file the reply within two weeks for perusal of the Commission.

Pursuant to the directions of the Commission dated 15.05.2025, the SP, Sagar, MP dated 03.06.2025 has submitted its reports, wherein it is stated that they had registered PS Khurai, FIR No.186/2025 dated 29.04.2025, u/s 356(1), 308(2),308(3) BNS against the accused in the matter.

The Commission had considered the material placed on record. Having perused the report, the Commission, in the interest of fairness and equity, considers it appropriate to invite comments from the complainant.

Therefore, let a copy of the report of the the SP, Sagar, MP dated 03.06.2025, be transmitted to the complainant, who may submit his/her comments within four weeks positively.

In case the complainant fails to furnish comments within the stipulated time period of 4 weeks, it shall be deemed that the complainant has nothing further to say in the matter and then the Commission shall deal with the case on merits.

Anneuxre P-11

FIRST INFORMATION REPORT

(Under Section 173 B.N.S.S.)

1. **District:** Sagar **Year:** 2025 **P.S:** Khurai
FIR No.: 0186 **Date & Time of FIR:** 30/04/2025 17:50 Hrs

2.

Sl No.	Acts	Sections
1.	Bharatiya Nyaya Sanhita (B.N.S.), 2023	356 (1)
2.	Bharatiya Nyaya Sanhita (B.N.S.), 2023	308 (2)
3.	Bharatiya Nyaya Sanhita (B.N.S.), 2023	308 (3)

3. **(a) Occurrence of offence:**

1. **Day:** Tuesday **Date From:** 29/04/2025 **Date to:** 29/04/2025

Time Period: **Time From:** 11:00 hrs **Time To:** 17:00 hrs

b. **Information received at P.S:**

Date: 30/04/2025 **Time:** 17:44 hrs

c. **General Diary Reference:**

Entry No: 024 **Date/Time:-** 30/04/2025 17:47 hrs

4. **Type of Information:** Written

5. **Place of occurrence:**

(a) Direction and distance from P.S.: North, 1.5 Km(s)

Beat No:

(b) Address: Bus Stand Khurai.

(c) In case, outside the limit of this Police Station,

Name of P.S.

District (State)-

6. Complainant / Informant:

(a) Name: Rahul Chaudhary

(b) Father's / Husband's Name: Shri Pradeep Chaudhary

(c) Date/Year of Birth: 1981

(d) Nationality: India

(e) UID No.

(f) Passport No.

Date of Issue:

Place of Issue:

(g) Id details (Ration Card, Voter ID Card, Passport, UID No., Driving License, PAN)

S.No.	Id Type	Id Number
1		

(h) Address:-

S.No.	Address Type	Address Number
1.	Present Address	Acharya Vidyasagar Ward, Khurai, Sagar, Madhya Pradesh, India
2.	Permanent Address	Acharya Vidyasagar Ward, Khurai, Sagar, Madhya Pradesh, India

(i) Occupation:-

(j) Phone Number:

Mobile: 91-9826777707

7. Details of Known/Suspect/Unknown accused with full particulars

(Accused more than):

S.No.	Name	Alias	Relative's Name	Present Address
1.	Ansul Parihar			1. Khurai, Khurai, Sagar, Madhya Pradesh, India

8. Reason for delay in reporting by the complainant/informant:

9. Particulars of the properties stolen/involved (attach separate sheet if necessary):

Sl.No.	Property Category	Property Type	Description	Value (In Rs/-)

10. Total value of property stolen:

11. Inquest Report/U.D. case No., if any:

12. First Information Contents (Attach separate sheet, if required):

I am a resident of Acharya Vidyasagar Ward, Khurai, and currently hold the position of President in the BJP Nagar Mandal. On 29.04.2025, between 11:00 AM and 05:00 PM, Anshul Parihar, a resident of Burai, conducted a press conference in which he tarnished and attempted to harm the clean public image of the Hon'ble Former Minister and MLA

Shri Bhupendra Singh Ji, and later shared the same on social media. I hereby submit this application requesting that necessary legal action be taken. From the contents of the application, offences under Sections 356(A), 308(2), and 308(3) of the BNS (Bharatiya Nyaya Sanhita) are found to be made out, and therefore, a criminal case has been registered against the non-applicant, Anshul Parihar, and taken up for investigation. A copy of the application is as follows “ To, the SHO Police Station Khurai, District Sagar (M.P.), Subject:- Request for legal action against Anshul Singh Parihar, resident of Burai. Respected Sir, I respectfully submit the following request before you- 1) Hon’ble Shri Bhupendra Singh is the respected elected Member of the Legislative Assembly (MLA) from Khurai Constituency, representing the Bharatiya Janata Party (BJP). He has also previously held ministerial positions in key departments of the State Government. (2.) Since the year 2013, Hon’ble Bhupendra Singh Ji has made remarkable contributions toward the development of Madhya Pradesh, Khurai Assembly Constituency, and Burai town. Due to his efforts, continuous development work is being carried out in the Khurai Assembly area, which is being appreciated across the

state. Thus, he is regarded as a popular and clean-image public representative throughout the state. (3.) That on 29th April 2025, an attempt was made to tarnish his clean image by organizing a press conference. It is important to state that Hon'ble MLA Shri Bhupendra Singh is not operating any crusher in the Burai region, nor is he providing protection to any such operation. Despite this, Anshul Parihar, a resident of Khurai, during the press conference on 29th April 2025, falsely alleged that Bhupendra Singh is responsible for the electrocution of a minor named Manas Shukla due to contact with a high-tension power line at a crusher. This act, clearly stemming from political conspiracy and malicious intent, and based on fabricated and misleading facts, was deliberately published with the intention of gaining unlawful advantage and damaging the reputation of the Hon'ble MLA. This highlights that Anshul Parihar has committed this illegal act intentionally and with ulterior motives. (4.) That, the alleged incident is being reported to have occurred in January 2025. The fact that such an incident is being brought to light for the first time after nearly four (04) months is highly surprising and clearly indicates political conspiracy and manipulation. (5.) That on 29th April 2025,

Anshul Parihar, resident of Khurai, during a press conference, made a false statement alleging that the Hon'ble MLA from Khurai, Shri Bhupendra Singh Ji, was responsible for the alleged incident. In doing so, he has caused harm to the reputation of the Hon'ble BJP MLA and has committed the offense of unauthorized defamation and character assassination.

(6.) That on the said date, through the press conference, false and misleading statements were made against Hon'ble BJP MLA Shri Bhupendra Singh Ji with the malicious intent to defame him and obtain unlawful personal gain. These statements were subsequently published in various newspapers across the state, thereby damaging the clean public image of the Hon'ble MLA, which constitutes a clear act of defamation and malicious political intent. (7.) That, on 29th April 2025, Anshul Parihar issued threats to falsely implicate Hon'ble BJP MLA from Khurai, Shri Bhupendra Singh Ji, by making baseless and fabricated allegations. It is also essential to investigate who else is involved in this conspiracy along with Anshul Parihar. Therefore, it is humbly requested that an FIR be registered against Anshul Parihar and all individuals involved in this conspiracy, and strict legal action be taken against them. Date:-

30.04.2025, Signature- Applicant (Signature illegible in English) Supporting Members- Jamunaprasad, Saubhagya Singh, Suratsingh Pipariya, Omprakash Ghaurat, Premnarayan Mudri, Munna Singh, Rajpal Singh (Mandal President, Dhanaura), Ravindra Singh Rajput (Gramin Mandal President), Rajabhai Thakur, Narendra Dwivedi, Praveen Jain, Pramod Soni, Mukesh Adivasi, Saurabh Nema, Rahul Baharpur, Mahendra Rajak, Gaurav Rai, Jagdish Ahirwar, Rishabh Rai, Akash Parihar, Swapnil Agrawal, Jitendra Singh Dhanaura, Balram Yadav, Nannibai Ahirwar (Municipal Council President), Randhir Thakur, Rashmi Soni (Mahila Morcha President), Neetu Ajmani, Archana Jain, Nipa Nagdev, Vinita Saur, Councillor Harishankar Kushwaha, Kashiram Ahirwar, Rajendra Yadav and others.

13. Action taken since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2.

**(1) Registered the case and took up the investigation:
OR**

**(2) Directed (Name of the I.O.): Kamlesh Singh
Rank: OFFICIATING ASST. SUB-INSPECTOR)**

No.: 3636 to take up the Investigation OR

(3) Refused investigation due to: OR

Office of the Superintendent of Police, Sagar (M.P.)

No.: S.P./ Sagar/H.R.C./36/2025

Date:- 03.06.2025

To,

Assistant Registrar (Law)
National Human Rights Commission
Law Division, M-4
Human Rights Commission Building
C-Block, C.G.O. Complex
INA, New Delhi – 110023

Subject- Application submitted by the applicant Rakesh Shukla, S/o
Suraj Shukla, resident of Village Barma, Tehsil Khurai, District
Sagar

Reference: Case No. 529/12/37/2025 dated 21.03.2025 and Case No.
1138/12/37/2025 dated 29.05.2025 of the National Human
Rights Commission.

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Kindly refer to the above-mentioned subject and the referenced
communication, through which the applicant Rakesh Shukla, S/o Suraj
Shukla has submitted a complaint stating that the respondent
Bhupendra Singh, MLA of Khurai, and his nephew Lakhan Singh
Thakur were involved in illegal mining activities, whereby gravel was
extracted and stockpiled from a crusher. As a result of this act, the

applicant's son Manas Shukla came in contact with a high-tension electric line. The complaint further alleges that no report was registered at Bina Police Station despite attempts to lodge one, among other related facts.

The said complaint was investigated by the Sub-Divisional Officer of Police, Bina, District Sagar. The Investigating Officer reported that upon examination of the records of Police Station Bina, it was found that on 01.01.2025, a hospital memo concerning injured Manas Shukla, S/o Rakesh Shukla, aged 14 years, resident of Village Bardha, Police Station Bina, was received from Civil Hospital, Bina. Upon receiving the memo at Police Station Bina, Head Constable No. 383, Satish Chowkikar, visited Civil Hospital, Bina, and recorded the statement of injured Manas Shukla, who stated that on 01.01.2025, he had gone to the plateau outside Village Bardha to attend a Bhagwat Katha. After listening to the Katha, while returning home, he attempted to move an electric wire lying near the crusher site with his hand, which resulted in electrocution.

During the investigation of the memo, the statement of the injured's father, Rakesh Shukla, S/o Suraj Prasad Shukla, aged 42 years, resident of Village Barcha, Police Station Bina, District Sagar, was recorded. In his statement, he stated that on 01.01.2025, he and

his son Manas Shukla had gone to the plateau outside the village to attend a Bhagwat Katha. After the discourse, his son was returning home with other children from the village, and while passing by the crusher site, his son Manas Shukla, while playing, touched an electric wire with his left hand, due to which he got electrocuted. He was immediately taken for treatment to the Government Hospital, Bina.

During the memo-level investigation at the police station, the statements of eyewitnesses (friends of the injured) who were returning with Manas Shukla were recorded in the presence of their guardians. These eyewitnesses included- 1- Chhotu alias Narendra, S/o Deshraj Ahirwar, aged 11 years, 2- Giriraj alias Adarsh, S/o Narendra Patel Kurmi, aged 12 years, 3- Sahil alias Yogesh, S/o Sandeep Singh Rajput, aged 17 years, (All residents of Village Bardha, Police Station Bina), in their respective statements, they stated that on 01.01.2025, they had gone with injured Manas Shukla to attend the Bhagwat Katha and Kalash Yatra at the plateau outside the village. After the Kalash Yatra, they were all returning home. On the way, when they reached near the crusher machine located at Gagarpa Road, Barpa, they noticed permanent electric poles with wires laid across the path, and an electrical D.P. placed near the side of the road. A heap of crushed stone (copra) was lying on the path under the electric wires. While

returning, one of the friends, Adhyansh, suggested that they all climb the heap and slide down for fun. Following this, all the boys climbed onto the heap and began sliding down playfully. During this, Manas, in an attempt to come down quickly, accidentally grabbed an electric wire while playing, unknowingly. As a result of touching the wire, Manas received an electric shock. The entire incident was immediately reported to Manas's father, Rakesh Shukla, who then took Manas to Bina for treatment on a motorcycle. During further inquiry at the incident site, all eyewitnesses confirmed that while playing on the stone heap, Manas accidentally touched the electric wire with his hands while climbing down, which resulted in the electrocution.

Based on the complete memo investigation conducted by Police Station Bina, including the Pre-MLC report and evidence gathered during the complaint inquiry, it was found that injured Manas Shukla, while returning from the Bhagwat Katha, climbed a heap of crushed stone (copra) lying on the path near a permanent electric pole (11 kV line) located near the crusher, and while playing by sliding down, accidentally grabbed an electric wire due to ignorance/innocence, resulting in electrocution and injuries to his left hand. Based on all the available evidence, the investigation did not find the occurrence of any cognizable or non-cognizable offence.

Similarly, upon examining the records of Police Station Khurai, it was found that on 30.04.2025, a written complaint was submitted by complainant Rahul, S/o Pradeep Chaudhary, aged 44 years, resident of Khurai, stating that on 29.04.2025, the respondent Anshul Parihar, resident of Khurai, held a press conference wherein he allegedly defamed and attempted to tarnish the clean image of Hon'ble Bhupendra Singh, MLA of Khurai, thereby causing damage to his reputation, and subsequently shared the same via a tweet on social media. Based on this information, Crime No. 186/2025 under Sections 356(1), 308(2), and 308(3) of the Bharatiya Nyaya Sanhita (BNS) was registered against the respondent at Police Station Khurai, and the matter was taken up for investigation.

All legally appropriate actions have been taken on the applicant's petition.

The report has been submitted through the **HRCNET Portal**.

Enclosures:

01. Detailed investigation report of the Investigating Officer
02. Copy of the Pre-MLC report.
03. Copies of 5 recorded statements

SD/-

(Vikas Kumar Shahwal)

Superintendent of Police,

District Sagar

Copy to:-

- 1- Inspector General of Police (Complaints/Human Rights), Police Headquarters, Bhopal, in reference to their letter No. /PHQ/Complaints/NH/15/28/2025, 6508-03A/25 Bhopal, dated 02.05.2025, the report is being submitted.
2. Office of the Collector, District Sagar, in reference to their letter No. /4342/HR/225 Sagar, dated 16.05.2025, the report is being submitted.

SD/-

Superintendent of Police,
District- Sagar

Annexure P-14

To,

Hon'ble Secretary,

National Human Rights Commission,

Human Rights Bhawan, Block "C", G.P.O. Complex, I.N.A., New Delhi 110023

Subject: To express dissatisfaction with the action taken so far by the Commission

Case No.: 529/12/37/2025

Sir,

It is humbly submitted that I, Rakesh Shukla, am the complainant in the above case. I am completely dissatisfied with the action taken so far by the Commission in this matter and the report submitted by the concerned authorities. I humbly wish to register my dissatisfaction through the following points.

1. No concrete action has been taken so far. Not a single FIR has been registered against the persons who seriously injured my son Manas Shukla—MLA Bhupendra Singh and his nephew Lakhan Singh, a crusher operator—because influential political persons are involved. In such a situation, an impartial investigation cannot be expected. The FIR shown in the brief incident report dated 03/06/2025 presented by the Superintendent of Police, Sagar, has been lodged against Mr. Anshul Singh Parihar, who gave a statement in the media against the accused and regarding the incident that happened with my son Manas Shukla. However, no FIR has been lodged on behalf of my son or me.

2. No security has been provided to me and my family, despite my clear statements in letters that our lives are in danger. We are constantly receiving threats, and influential

persons are being sent to my house to create pressure. There have also been threats of kidnapping my son if we do not obey.

3. My son has neither received any medical assistance nor compensation. I have already spent about Rs. 20 lakh on his treatment by mortgaging my house, land, and my wife's jewellery. I am under such debt that I may attempt suicide in the future. I request immediate assistance and proper compensation to repay loans incurred for treatment at Bina, Sagar, Bhopal, AIIMS, and other hospitals.

4. The government has not yet initiated any process to provide an artificial hand to my son, as earlier directed by the Commission.

5. The illegal crusher site is still operating at the same place. The Sub-Divisional Officer, Bina, and the Police Station In-charge, Bina, both mentioned in their reports that the heap of ballast is still lying on the road near the crusher at Magardha Road, Barcha. This proves that the district administration has not followed the Commission's instructions to remove or close the crusher.

All administrative officers of Sagar failed to appear before the Commission, demonstrating their lack of seriousness about the matter and disregard for the Commission's orders.

Based on the above facts, I again request an independent investigation under judicial supervision. Immediate security should be provided to my family and me. My son Manas Shukla should be compensated, and Rs. 20 lakh spent on medical treatment should be reimbursed. The district administration should ensure future medical care, and strict legal action, including arrest, should be taken against the culprits.

I hope the Commission will take this letter seriously and initiate necessary action in the interest of justice.

Regards,

Rakesh Shukla

Father – Mr. Suraj Shukla

Village – Vardha, Tehsil – Khurai

District – Sagar, Madhya Pradesh

Date:

IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION

CRL M.P No. _____ of 2025

IN

WRIT PETITION (Criminal) No. _____ OF 2025

(Under Article 32 of the Indian Constitution)

Rakesh Shukla and Anr

...Petitioner

Versus

State of Madhya Pradesh & Ors

...Respondents

APPLICATION SEEKING EXEMPTION FROM FILING ORIGINAL
TRANSLATION OF DOCUMENTS

TO,

THE HON'BLE THE CHIEF JUSTICE

OF INDIA AND HIS COMPANION JUDGES

THE HON'BLE SUPREME COURT OF INDIA

THE HUMBLER PETITION OF THE

PETITIONER ABOVE NAMED.

1. The present writ petition under Article 32 of the Constitution is filed by Petitioner No. 1, father of Manas Shukla, a minor who suffered 70% disability after being electrocuted by a high-tension wire. The incident occurred when the child climbed an illegally dumped heap of crushed stone behind a

playground in Khurai, Madhya Pradesh to secure his ball, The illegal pile of crushed stone was placed by Lakhan Singh, owner of an unauthorized **mining** operation and nephew of Bhupendra Singh, ex Cabinet Minister and sitting MLA of district Khurai Madhya Pradesh.

2. That the contents of the petition are not repeated here for the sake of brevity but the same may be read as part and parcel of the instant application.
3. That the Petitioner is filing this Petition and Supporting documents, namely Annexures P-1,P-2,P-3,P-4,P-12,P-13 and P-14 from Pages ____ to ____ which were originally in Hindi and due to paucity of time the same could not be translated by an official translator. The annexures have been translated as per their true originals by the translator who is well versed in Hindi and English.
4. That in view of the facts and circumstances, it is expedient in the interest of justice that the documents filed herewith and mentioned here under may be taken on record.

PRAYER

5. It is, therefore, prayed most respectfully that Your Lordship may be pleased to:
 - a. Exempt the petitioner from filing the official translation of Annexures: P-1,P-2,P-3,P-4,P-12,P-13 and P-14 from Pages ____ to ____.
 - b. Pass any other orders which your Lordships deem fit and proper in the facts and circumstances of the present case.

**AND FOR THIS ACT OF KINDNESS PETITIONER AS IN
DUTY BOUND SHALL EVER PRAY.**

Date: 19.07.2025

Place: New Delhi

FILED BY:



(Satya Mitra)

AOR for Petitioner

Registration No. 1852 E-mail id:

satyamitra2003@yahoo.co.

IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION

CRL M.P No. _____ of 2025

IN

WRIT PETITION (Criminal) No. _____ OF 2025

(Under Article 32 of the Indian Constitution)

Rakesh Shukla and Anr

...Petitioner

Versus

State of Madhya Pradesh & Ors

...Respondents

APPLICATION SEEKING DIRECTIONS

TO,

THE HON'BLE THE CHIEF JUSTICE

OF INDIA AND HIS COMPANION JUDGES

THE HON'BLE SUPREME COURT OF INDIA

THE HUMBLER PETITION OF THE

PETITIONER ABOVE NAMED.

1. The present writ petition under Article 32 of the Constitution is filed by Petitioner No. 1, father of Manas Shukla, a minor who suffered 70% disability after being electrocuted by a high-tension wire. The incident occurred when the child climbed an illegally dumped heap of crushed stone behind a

playground in Khurai, Madhya Pradesh to secure his ball, The illegal pile of crushed stone was placed by Lakhan Singh, owner of an unauthorized **mining** operation and nephew of Bhupendra Singh, ex Cabinet Minister and sitting MLA of district Khurai Madhya Pradesh.

2. That the contents of the petition are not repeated here for the sake of brevity but the same may be read as part and parcel of the instant application.
3. That the Petitioner comes from a very poor family. That because of the negligence of the respondents. The Son of the petitioner has suffered irreparable damage. Because of the electrocution the petitioner's son is 70% disabled. The petitioner has spent more than Rs 20 Lakh for the treatment of his son. The Respondents have not contributed even a single rupee for the treatment of the victim.
4. The Illegal storage of the crushed stone still exists and is only possible because of the protection extended by the MLA of Khurai Bhupendra Singh. Because of his Protection no authority can take action against because of the afore mentioned reason. It continues to be a big safety hazard for the general public at large.

PRAYER

5. For the aforementioned reasons, this Hon'ble court may be pleased to:
 - a) For an order or direction granting interim relief to the victim, Master Manas Shukla, including compensation of ₹20 lakhs and provision of a suitable artificial hand.

- b) For an order suspending the District Magistrate _____ and the Superintendent of Police _____ for their failure to comply with the directions issued by the National Human Rights Commission (NHRC).
- c) For an order or direction to immediately cease and close down all illegal mining activities in Khurai, Madhya Pradesh.
- d) For any other order or direction that this Hon'ble Court may deem just, fair, and proper in the interest of justice.

AND FOR THIS ACT OF KINDNESS PETITIONER AS IN DUTY BOUND SHALL EVER PRAY.

Date: 19.07.2025

Place: New Delhi

FILED BY:



(Satya Mitra)

AOR for Petitioner

Registration No. 1852 E-mail id:
satyamitra2003@yahoo.co.

IN THE SUPREME COURT OF INDIA

CIVIL/CRIMINAL/APPELLATE/ORIGINAL JURISDICTION

SPECIAL LEAVE PETITION (Crl) NO.

OF 2025

BETWEEN

RAKESH SHUKLA & ANR

Petitioner(S)/Appellant (S)

AND

THE STATE OF M.P. & ORS

Respondent(S)

VAKALATNAMA

I, Rakesh Shukla, Petitioner in the above Petition do hereby appoint and retain.

ADVOCATE-ON-RECORD, SUPREME COURT OF INDIA

to act and appear for me in the above Petition and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same or any decree or order passed therein, including proceedings in taxation and application for Review to file and obtain return of documents, and deposit and receive any money on my behalf in the said Petition and in application for Review, and to represent me/us and to take all necessary steps on my behalf in the above matter.

I agree to ratify all acts by aforesaid Advocate in pursuance of this authority.

Date on the 9th day of July 2025

ACCEPTED & IDENTIFIED & VERIFIED

राकेश शुक्ला

PETITIONER

(अभिज्ञान सिद्धिपति)

ADVOCATE-ON-RECORD
Supreme Court of India
Petitioner

MEMO OF APPEARANCE

To

The Registrar, Supreme Court of India, New
Delhi.

Sir,

Kindly enter my appearance in the above-mentioned case on behalf of the Petitioner

Thanking You,

Yours faithfully,

New Delhi

Date: 09.07.2025

Advocate for the Petitioner