

SYNOPSIS AND LIST OF DATES

The present PIL raises the arbitrary, discriminatory and unconstitutional policies of the canteens being run by the Ministry of Defence through the grants given by the Government of India and generating huge profits but diverting the said profits for other purposes which has already been objected by the PAC. Despite the fact that the CSD is being run by public funds, the policies as framed are discriminatory and violative of Article 14 of the Constitution of India as the same are totally against the JCOs, NCOs and ORs and their family members constituting 97% of the Armed Forces who are denied several benefits of Canteen Services Departments. The respondent has discriminated the JCOs, NCOs and ORs by making a cap on the limits of the purchases based on the ranks and further purchase of automobiles which is most unreasonable and arbitrary. The right to purchase an automobile is based on the rank of the officer and large cars and the frequency of the purchase of such cars is restricted for the JCOs, NCOs and ORs which is the worst form of discrimination.

The officers are given a separate line whereas as the JCO, NCOs and ORs are being made to stand in a separate line at the canteens which is visibly discriminatory and without any justification.

The profits generated in the canteens is diverted to the unit funds and several irregular financial practices have been noticed by the Public Accounts Committee still the respondents have indulged in eye wash and formulating the same discriminatory policies.

The accounts of the CSD are not subjected to audit by the CAG which is another form of serious irregularity as the entire CSD is being run by the grants of the Government of India through public money.

LIST OF DATES

Pre 1927	Supplies to the defense personnel was being done through the Army Canteen Board.
1927	Named as 'Canteen Contractors Syndicate' as a limited Company under the Government control.
1942	With the onset of world war II, Govt established the canteen service by disbanding contract syndicate.
1948	Canteen services renamed as Canteen Store Department (CSD) being run by contractors.
April 1977	Takeover of the contractor run canteens by Unit or Formation, so that profit from the sale of canteen store could be retained with the Unit/Formation for welfare of the troops.

Govt agreed to the proposal and the concept of unit run canteens (URCs) , thus came into being. CSD funds were merged with the Consolidated Fund of India (CFI) and CSD became a full-flagged organization under the Ministry of Defence (MOD).

30 July 1956 & 05 Jun 2007

Respondent formulated arbitrary and discriminatory policy for distribution of canteen profit up to 33% on amenities of officers. Not only this 75% of the Exclusive ESM Canteen is taken by the respective command headquarters which is a huge amount spent by the ESM.

16 April 2015 Discriminatory, illegal, arbitrary and unconstitutional order for limit of purchasing for CSD store for three categories ie Officers, JCOs and other rank was issued.

29 April 2015 Discriminatory, illegal, arbitrary and unconstitutional order for entitlement of different CC of car for officers, JCOs and other ranks and restriction in number of year for purchasing of car for officers, JCOs and other ranks was issued.

March 2016 The Public Accounts Committee in its 48(201-2012) and 75th (year 2012-13) report has recommended that in view of pecuniary benefits that the URCs (Unit run canteen) got from the State in terms of soft loans, Quantitative Discount (QD), free land , deputation of service personnel to man the URCs etc and also URC have the trapping of Government and semi Government organization, URC must be audited by the Supreme Auditor for greater assurance of transparency in the operation of the URCs. In the action taken note on the said report, while the Ministry has agreed for the audit of QD account by the C&AG and has formulated guideline for the utilization and distribution of QD for all URCs, the decision on audit of overall functioning of URCs by C&AG and bringing its accounts under unified accountability regime was still under consideration (March 2016)

23 Jun 2017 Many representations against discriminatory, illegal, arbitrary and unconstitutional provisions for limitation of purchasing of CSD good and Car and separate Q for

officers, JCOs/ORs and utilization of canteen profit for construction of Medical, Engineer and Professional collect were submitted to PM, RM and Army Chief last one on 23 Jun 2017.

17 July 2017 Represented submitted on 23 Jun 2017 replied by respondent on 17 July 2017 has been replied by the Canteen Service Directorate, Quarter Master General Branch, Army Headquarters (Integrated HQ of MOD) which are not satisfactory and defying the our fundamental rights and in favour of officers.

HENCE THIS PETITION

IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRA ORDINARY CIVIL WRIT JURISDICTION)

WP (C) No. _____ of 2018

In the matter of:

MEMO OF PARTIES

1. Voice of Ex-Servicemen Society (Regd)
Through its General Secretary,
Mr Bir Bahadur Singh
House No.59, Gali No. 14, Extn.
Near Kakrola More,
Vipin Garden Extn,
Mohan Garden,
Uttam Nagar West, Delhi-110059. ...Petitioner No.1.
2. Ex- Subedar Braj Kishor Jha (Retd)
JC-347836-F
R/o House No.59, Gali No. 14, Extn.
Near Kakrola More,
Vipin Garden Extn,
Mohan Garden,
Uttam Nagar West, Delhi-110059. ...Petitioner No.2.
3. Ex. PO Shambhu Kumar (Retd)
S/o Sh. Ramashish Singh
R/o A-7, Gali No.1, Rajapur,
Uttamnagar, New Delhi-110059. ...PetitionerNo.3.
4. Ex-Sgt. Rajeev Behal (Retd.),
S/o Late Sh. VidyaSagarBehal,
728, Basant Avenue,
Ludhiana, Punjab ...Petitioner No.4.

VERSUS

Ministry of Defence
Through Secretary and Dy Dte Gen Canteen Service
Integrated HQ of MOD (Army)
Quartermaster Generals' Branch
Army Headquarters, New Delhi ...Respondent

DRAWN & FILED BY:

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IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRA ORDINARY CIVIL WRIT JURISDICTION)

WP (C) No._____ of 2017

**(PUBLIC INTEREST PETITION UNDER ARTICLE 226
& 227 OF THE CONSTITUTION OF INDIA)**

In the matter of:

Voice of Ex Servicemen Society &Ors ...Petitioners

VS

Ministry of Defence ...Respondent

**WRIT PETITION UNDER ARTICLE 226& 227 OF THE
CONSTITUTION OF INDIA FOR THE ISSUANCE OF:**

To,

The Hon'ble Chief Justice,

and the companion judges of Delhi High Court;

MOST RESPECTFULLY SHOWETH AS UNDER:

1. That the petitioners are filing the present writ petition in public interest. The petitioners being Ex Service Men (ESM) and the petitioner No.1 being the representative body of the ESM has no personal interest in the litigation and the petition is not guided by self-gain or for gain of any other person/institution/body and that there is no motive other than of public interest in filing the writ petition. The present petition is filed for the welfare of the large number of ESM who are facing discrimination besides that huge amount of the government money is being wasted which needs to be protected. As a matter of fact, the present litigation is not an adversarial litigation but a cooperative litigation wherein the petitioners are

seeking the indulgence of the court in passing various orders for streaming the process of CSD.

2. That the present writ petition is against the arbitrary, illegal and unconstitutional acts of the respondents whereby they have made discriminatory, arbitrary and financially irregular provisions with regard to the availing of the facilities of CSD by the JCOs, NCOs and Ors and have prohibited them from most of the beneficial services in gross violation of Article 14 of the Constitution of India and Protection of Civil Right Act 1955 (Act 22 Of 1955).

3. That the petitioner has based the instant writ petition from authentic information and documents obtained from various government departments/portals and has verified the veracity of the same at his level.

4. That the petition, if allowed, would benefit large number of ESM and the citizens of this country.

5. That the persons affected by such acts of the State are numerous and are not in a position to approach the Hon'ble Court hence the petitioner is filing the present PIL on behalf of such affected persons. There are no other respondents affected in the present petition except for the present respondent.

6. That the respondent is the instrumentality of State, hence "State" within the meaning under Article 12 of the Constitution of India.

7. The petition raises the following important questions of law for kind considerations and orders by the Hon'ble Court:

A. Whether Canteen Stores Department and URC (Unit run canteens) , established by the Ministry of Defence for serving to the quality needs of the employees and ex-employees of the defence services can formulate, adopt and perpetuate discriminatory policies' and practices wherein debarring the JCOs, NCOs and ORs from certain services on the basis of their ranks?

B. Whether the Rules and regulations mandating the discrimination with the JCOs, NCOs and ORs for the benefits of the CSD are not discriminatory and liable to be quashed?

C. Whether the transfer and utilization of the profits earned from the CSD services byURCs are not liable to be audited by the CAG as the same is to be utilized for the welfare of all the beneficiaries in constructive way or deposited in Consolidated Fund of India or refunding the profit to the beneficiary in the line of Gas Subsidy ?

D. Whether, the transfer of the operational profits of the CSD and URCs by the officers' cadre is not illegal on the face of it and liable to be accounted for properly?

8 That the brief facts giving rise to the present petition are as under:

8.1 That the petitioner No.1 is a representative body of the veterans of all the Armed Forces of India and is a registered society under the Indian Societies Registration Act, 1860. Rest of the petitioners are individuals retired from the three wings of the Armed Forces and committed to the cause of the welfare of their services. The General Secretary of the society Mr Bir Bahadur Singh has been authorized to file the petition vide a resolution of the society and the present petition is being filed by him. The copy of the resolution dated 24/7/2017 is being filed herewith as **ANNEXURE-P-1**.

8.2 That the present petition is being filed to seek a direction of prohibiting the discriminatory and unconstitutional practice being perpetuated by the respondent in treating the JCO/NCO and ORs discriminatorily which is in violation of Article 14 & 17 of the Constitution of India besides the violation of the Protection of civil rights Act 1955 (Act 22 of 1955) and denial of access to the Controller of Auditor General for audit of Unit Run Canteens and arbitrary using canteen profit.

8.3. That the Canteen Services Department (Hereinafter referred to as the CSD) The Canteen Stores Department, CSD as it is commonly referred to, was created to provide 'easy access to quality products of daily use, at prices less than market rates' to the soldiers, ex-servicemen and their families and defence civilian by the Ministry of Defence. It is controlled, operated

and regulated by the Ministry of Defence. The governing body of the Canteen Services in India is the Board of Control for Canteen Services (BOCCS) which is headed by Hon'ble Raksha Rajya Mantri (RRM) and has as members the Defence Secretary, Secretary Defence (Finance), the Quarter Master General (QMG), COP (Naval HQ), AOA (Air HQ). The Board is assisted by an Executive Committee of BOCCS while the day to day management of CSD is controlled by the General Manager CSD who is ex-officio Chairman of the Board of Administration. The General Manager (of the rank of Major General) is assisted by two Joint General Managers, seven Deputy General Managers, 18 Assistant General Managers, 5 Regional Managers and 34 Area (Depot) Managers and other Officers. There are more than 5500 unit run canteens being run by unit/formation through which CSD items are sold to the consumers.

8.4. That the CSD services are created and operated not for profit and like other chains has adopted best trade practices in all aspects of its operations. CSD's trading operation is worked around seven basic product Groups.

Group I - Toiletries

Group II - Household Requisites

Group III - General Use Items

Group IV - Watches and Stationery

Group V - Liquor

Group VI - Food& Medicinal Items

Group VII - 4 Wheelers, 2 Wheelers & White goods.

8.5. That, to meet the financial obligations , CSD receives budget allotment every financial year from Ministry of Defence (MOD) under various 'Heads' and the funds are released on weekly basis through Controller of Defence Account (CDA) CSD. Details of allotment & Expenditure of CSD during last six years mentioned at chapter-1 of performance audit report 38 of 2016 of Comptroller of Auditor General of India Report No 38 of 2016 is being filed herewith **ANNEXURE - P-2.**

8.6. That with the increase in the income of the defence personnel, the CSD is growing rapidly with annual turnover of over Rs. 15,000/ crore during 2015-16 and 18,000 crores in Financial year 2017-18 which is account for 5-7% of India's consumer good market and report to this effect was also published in media under heading

“Which is the most profitable retail chain in India? Answer: The defence canteen stores. Its earnings exceeded those of all other chains, including Future Retail and Reliance Retail. The Canteen Stores Department (CSD), which, incidentally, is a not-for-profit organisation, earned Rs 236 crore“.

8.7. There are two type of canteen benefits, one is Quantitative Discount and the another is a fixed percentage of profit margin ranging from 0% to 10%. Details of profit of CSD on account of Quantitative Discount(QD) generated

through the CSD and provided to the Unit Run Canteens (URC) in form of free stores for last six years as per the declaration of the respondent during the performance audit of CSD by the Comptroller of Auditor General of India Report No 38 of 2016, chapter IV table 12 is being filed with as **ANNEXURE- P-3.**

Financial Years	Net profit declared by respondent
2010-11	267.84 Crore
2011-2012	216.31
2012-2013	219.35
2013-2014	177.94
2014-2015	235.69

Total	1117.13

Note* Addition 1100 crores profit in Financial Year 2017-18 through log delayed value added tax (VAT) refunded from several state governments and penalties from companies that breached fair-pricing agreements and report to this effect has been published in Economic Times dated 03 April 2018.

8.8. In addition, the Units/formation running Unit Run Canteens (URCs) also generate profit by imposing the following percentage of profit on each grocery and liquor items:

Liquor	-10%
Cosmetic	-05%

AFD items (II)	-1%
Basic necessities (Soap&Det)	-3%
Oil Hydro and Tea	-1%
All GS items	-5%
IMFL	-10%

8.9. That the details of profits generated through this mean is not available as C&AG is not permitted access to the URCs for the performance audit as the Army has arbitrarily declared it as non public fund despite recommended by PAC in para 14 of its 75th report (year 2012-13) to bring it under the preview of C&AG. Para 14 of the PAC report is being filed herewith with **ANNEXURE -P 4.**

8.10. That the Unit/Formation running URCs receive profit by two means i.e. through Quantitative Discount (QD) which is a trade related incentive discount provide by CSD to URCs in the form of free stores and through levelling unit profit which from 1% to 10%, out of the same around 33% of all type of profits are deposited in the officers Mess/expended on amenities on officers whereas only 3% profit contributed by the officers. Rest profit is also utilised on discretion of OC of the unit concerned. In this connection Army Headquarters, Quarters Master General's branch letter No 60306/Q/CAN/Q1(A) dated 30 July 1956 is attached to **ANNEXURE- P- 5.** In case of Ex-Servicemen Canteen, 75% of the net profit are deposited in

designated Command Welfare Fund and 25% to the units running the canteen. Army HQ, Quartermaster General Branch Letter No 96036/Q/DDGCS dated 05 Jun 2007 is being filed herewith as **APPENDIX -P-6.**

8.11. That the discriminatory and parochial policy of the respondent is further visible when they transfer the profits of the CSD canteen operations @ 33% to the officers mess whereas the ratio of the officers as the beneficiaries of the CSD canteen is only 3%. In case of Ex-Servicemen canteen, 75% profit send to respective command and rest is utilised by the unit/formation running the canteen. This is the worst type of discrimination and irregularity as the officers' cadre eat away the entire profit generated from the purchases made by the JCOs, NCOs and ORs. In year 2012 some guide line for expending of QD was issued but the same is also not being followed and the discriminatory acts of the respondents continue. C&AG observation mentioned at para 6.3.1 of report No 38 of 2016 in this regards is being filed herewith as **ANNEXURE-P- 7.** This aspect needs serious consideration at the level of the formulation of such office orders as they are arbitrary and not in accordance with the mandate of law. In the name of jawans the utilization of the said profits is misused and not being done for the welfare of the beneficiaries and the same are diverted for other purposes at the disposal of the serving unit/station/formation commander and serving officers who

constitute only 3% of the beneficiaries of the CSD services. The misuse of profits has also been objected by the Controller of Auditor General in their report No 38 in the year 2016. However, PAC in its 48th report year 2011-12 and 75th report 2012-13 had reiterated that extension of welfare activities to the jawans from their own contribution was not in consonance with the principle of welfare state as enshrined in the Constitution and therefore, desire that all the welfare need of jawans be brought before Parliament to seek the requisite fund as such, the grant of QD for welfare activities is not justified. Para 18 of the 75th report (year 2012-13) of PAC is being filed herewith as

APPENDIX – P – 8.

8.12. That to regulate the benefits of the CSD, the respondent has formulated various policies and rule with regard to operation however, the said rules and policies are discriminatory and in gross violation of Article 14 wherein the respondent has made practices of discrimination with the JCOs, NCOs and ORs under the garb of such policies.

8.13. That the lines at the sale counter of various CSD canteens is separate for the officers and their family members and JCOs, NCOs and ORs and their family members which is the worst form of discrimination as prices for goods are paid equally and the benefits of the CSD is to be equally given to all the defence personnel, irrespective of their ranks hence the practice of maintaining separate lines is hostile discrimination. The said is

further compounded by the fact that the beneficiaries of the CSD from the officers' cadre are only 3% whereas 97% are the JCOs, NCOs and ORs.

8.14. That the JCOs, NCOs and ORs are further restricted from entering several Defence Service Officers Institution (DSOI) canteens and canteen being run exclusively for officers and in many canteen separate portion for officers has been opened and such canteen or portion of canteen being run exclusively for officers are filled up with varieties and sufficient articles whereas common canteen lack sufficient and variety of articles which is a clear case of discrimination and also creating disability of untouchability as the CSD canteen services are for the welfare of the defence personnel and not for showing the grade and ranks of the officers. Such isolation of ESM of below commissioned officers ranks remind us the British Colonial system where Indian were restricted to enter certain place and restaurants by the Britishers. As a matter of fact, the contribution of the JCOs, NCOs and ORs in the services of nation is more remarkable as compared to the officers, hence the discrimination for the benefits of the CSD canteen services based on the rank is unconstitutional and liable to be struck down immediately.

8.15. That the hostile discrimination of respondents is further perpetuated vide various orders issued from the respondent from time to time thereby putting unreasonable restriction on the

JCOs, NCOs and ORs from availing the CSD canteen facility in a particular manner. The respondent has unreasonably issued an order thereby making restrictions on the limits of purchase for the various ranks of the defence personnel and has made further unreasonable restrictions on the JCOs, NCOs and ORs by putting the limit of annual purchase including purchasing of liquors which is artificial and without any justification. Non-commissioned officers and other ranks are entitled four bottle liquor and also denied high-quality whisky whereas an officer is entitled for 12 bottle to 18 bottles. How an officer can consume 18 bottles in a month i.e. more than a half bottle daily. Besides officers' being members of various clubs are also authorised to consume liquor there. The order issued by the respondent in this regard on 16/4/2015 vide their letter No 96027/Q/DDGCS /SOP dated 16 April 2015 is being filed herewith as **ANNEXURE – P – 9.**

8.16. That the respondent has further issued another review order dated 29/4/2015 thereby putting a restriction on the right of JCOS/NCOs/Ors to purchase four-wheelers on the basis of capacity of the engine. A retired Non- to commission officers and other ranks can purchased upto 1800 CC only once in service and once after retirement and the gap should be 10 years whereas officers can purchase up to 3000 CC after every four years. Subsidy is given to the economical and socially backward classes whereas in case of Army it is being given to

financially and socially sound class. The aforesaid classification is not only illogical, discriminatory but arbitrary and demeaning for the JCOs, NCOs and ORs about whom it presupposes that they cannot purchase the large engine cars or their frequency of the purchase of such cars will remain restricted. Widows of officers are made entitled to purchase the car but widows of JCOs/NCOs/ORs not entitled to purchase car through CSD. The copy of the review order dated 29.04.2015 is being filed herewith as **ANNEXURE – P – 10.**

8.17. That the accounts of the URCs are liable to be audited by the CAG as the PAC has also recommended the same. The public account committee in its 48 and 75th report has recommended that in view of pecuniary benefits that the URCs (Unit run canteen) got from the State in terms of soft loans, Quantitative Discount (QD), free land, deputation of service personnel to man the URCs etc and also URC have the trapping of Government and semi Government organization, URC must be audited by the Supreme Auditor for greater assurance of transparency in the operation of the URCs. In the action taken note on the said report, while the Ministry has agreed for the audit of QD account by the C&AG and has formulated guideline for the utilization and distribution of QD for all URCs, the decision on audit of overall functioning of URCs by C&AG and bringing its accounts under unified accountability regime was still under consideration (March 2016).

8.18. That several cases of irregularities in CSD/URC have been reported by CAG during its performance audit and chief of Army Staff has also admitted that their officers in uniform, at times, indulged in some malpractices and some friends in business partners have supported them, which is published in Economic Times dated 03 April 2018.

8.19. That the post of manager of URCs is exclusively reserved for retired Armed Forces Officers which is violation of Articles 14 and 16.

8.20. That PAC in his 75th reports year 2012-13), has pointed out that defying the provision of clause 2(b) & 2(c) of Army Order 48/72, as many as 80,000 (eighty thousand) service personnel are deployed full time basis to run 3000 URCs out of 4500 URCs and remaining are being run by civilian staff. The committee further pointed out that the Govt spends huge amount of money on the selection and rigorous training and development of the regular combatant so as to keep them in the state of full preparedness. Obviously, this deployment of combatants on regular basis to run the URCs leads to colossal waste of public money and defeats the very purpose for which the uniform cadre is created besides impinging on the security of the nation. Paragraph 15 of the PAC report is being filed herewith as **ANNEXURE – P – 11.**

8.21. That the petitioner No.1 being the representative body has made a detailed representation to the concerned departments including the Prime Minister of India, still no action on the said representation is undertaken. The copy of the representation dated 23 Jun 2017 by the petitioner to the respondent is being filed herewith as **ANNEXURE - P – 12**

8.22. That the respondents have replied to our representation dated 23.6.2017 vide their letter NO 96005/Q/Comp/ DDGCS/ Jul-17/Misc(212) dated 17 July 2017 and manipulated in favour of respondents. Reply of respondent dated 17 July 2017 is being filed herewith as **ANNEXURE -P-13.**

9. That aggrieved by the aforesaid, the Petitioners are before the court on following amongst other grounds:

GROUND

I. BECAUSE, the Canteen Stores Department and URCs established by the Ministry of Defence for serving to the quality needs of the employees and ex-employees of the defence services cannot formulate, adopt and perpetuate discriminatory policies and practices wherein debarring the JCOs, NCOs and ORs from certain services based on their ranks. The aforesaid policies are liable to be stuck down immediately.

II. BECAUSE, the Rules and regulations mandating the discrimination with the JCOs, NCOs and ORs for the benefits of the CSD are discriminatory and liable to be quashed.

III. BECAUSE, the transfer and utilization of the profits earned from the CSD services and URCs are liable to be audited by the CAG as the same is to be utilized for the welfare of all the beneficiaries either by returning it on line of gas subsidy to them or transferring the profit in Govt treasuries for opening of Medical/Engineer and other professional colleges for dependent of serving/retired JCOs/NCOs/ORs.

IV. BECAUSE, the respondent has no right to form different categories of beneficiaries for the CSD services which should be open to all irrespective of their ranks.

V. BECAUSE, the transfer of the profits from the operations of CSD services for the welfare of the officers and utilization of the same for officers is illegal on the face of it and liable to be stopped immediately.

VI. BECAUSE, the benefits of the profits need to be distributed on the basis of the ratio of employees i.e. 3% being officers and 97% being JCOs, NCOs and ORs.

VII. BECAUSE, the serving combatant soldiers deployed for running of URC need to be withdrawn.

VIII. BECAUSE, the accounts of the CSD and URCs are liable to be audited by the CAG as the same is run on public money granted by the Government of India.

10. That the petitioners have not filed any other writ petition before this court or any other High Court or before the Hon'ble Supreme Court of India seeking the identical relief.

11. That the Annexures filed along with the Writ Petition are true copies of their respective originals.

12. That the petitioner did not have any alternate and efficacious remedy except the present Writ Petition. The relief sought under the present petition cannot be sought before AFT or any other forum as the relief is by way of public interest and general direction cannot be issued by any other forum.

PRAYER

It is therefore most respectfully prayed that the court may issue:

a) Writ, order or direction in the nature of **CERTIORARI** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondents thereby quashing the review order No 96027/Q/DDGCS/SOP dated 16/4/2017 95286/SG/Q/DDGCS and 29/4/2017 being arbitrary and discriminatory and direct respondent to formulate uniform policy for all ranks of serving as well as ESM.

b) Writ, order or direction in the nature of **MANDAMUS** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondents thereby restraining the provision for separate line and separate Unit Run Canteens for officers and dividing portion of URCs for officers and JCOs/NCOs/ORs and to further issue directions for creation of separate line for senior citizen, disabled defence personnel and

common line for remaining categories i.e. officer, JCOs, NCOs and Other ranks.

c) Writ, order or direction in the nature of **MANDAMUS** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondent thereby mandating the distribution of the profits of the CSD operations to all JCOs, NCOs and ORs in the ratio of 3% for officers and 97% for JCOs, NCOs and ORs in similar line of Gas Subsidy or deposit the profit on Government treasure for opening of Medical Collages, Engineer colleges and other professional colleges for serving and retired defence service personnel and their dependents being CSD/URC non profitable organisation.

d) Writ, order or direction in the nature of **MANDAMUS** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondent thereby directing the respondent to submit the accounts of the URC operations for CAG and comply with the mandate of the same accordingly.

e) Writ, order or direction in the nature of **MANDAMUS** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondent thereby directing the respondent to withdraw all serving soldiers i.e. officers, JCOs, NCOs and other ranks deployed for running of URCs and post Ex-Servicemen and their dependent in URCs.

f) Writ, order or direction in the nature of **MANDAMUS** or any other appropriate, writ, order or direction in favour of the Petitioner and against the respondent thereby directing the respondent to appoint Canteen Manager from all ranks of ESM by formulating certain criteria and qualification.

g) Cost of the petition be also allowed in favour of the Petitioner.

h) Any other order which the Hon'ble Court may deem fit and proper in the facts and circumstances of the case be also passed in favour of the Petitioner.

PETITIONERS

- 1.
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THROUGH

COUNSEL