

**BEFORE THE HON'BLE MR. JUSTICE H.S. BHALLA (RETD.),
THE ETHICS OFFICER-CUM-OMBUDSMAN,
PUNJAB CRICKET ASSOCIATION, S.A.S. NAGAR (MOHALI).
Email ID: justicehsbhalla@gmail.com**

Complaint No. _____ of 2021

MEMO OF PARTIES

Piyush Rana son of Late Sh. Jawahar Lal Rana, House No. 125/126,
Street No. 22, Tripuri, Patiala.

... Complainant

Versus

- i) Sh. M.P. Pandove, resident of House No.426, Sector 35-A, Chandigarh and also at Laxmi Niwas, Arya Samaj Park, Patiala Phone No.0172-2668585, Mob. 9872217150;
- ii) Sh. R.P. Pandove, resident of # 3, Power Colony 1, Model Town Patiala, Mob. 09646200032 email ID: rppandove@yahoo.com, pdcapatiala@yahoo.com;
- iii) Sh. Gursewak Singh Walia, resident of #3204, Sector 32, Chandigarh, and also at Lehal Colony, Patiala and also at Premier Rubber Industries, Focal Point, Rajpura; Mob. 98722-19150.
- iv) Sh. Janak Raj Sachdeva, resident of Dhaliwal Colony, Jagdish Ashram Road, Patiala and also through CEO, Punjab Cricket Association.

... Respondents

Chief Executive Officer, Punjab Cricket Association, IS Bindra Cricket Stadium, S.A.S. Nagar (Mohali), email ID: ceo@cricketpunjab.in

... Proforma Respondent

Note: Service of respondent No. (i) to (iv) can also be effected through Proforma respondent No. (v) as all of them are Life Members of Punjab Cricket Association.

Recd
24/5/21

**COMPLAINT UNDER SUB-RULE (2) & (3) OF RULE 46 OF
THE MEMORANDUM AND RULES AND REGULATIONS OF
ASSOCIATION (AS REVISED UP TO 11.08.2019) AND ALL
OTHER ENABLING PROVISIONS,**

RESPECTFULLY SHOWETH:

1. The present complaint is being filed in terms of Sub-Rule (2) & (3) of Rule 46 of the Memorandum and Rules and Regulations of Association (as revised up to 11.08.2019) against following persons: -

- (i) Sh. M.P. Pandove, Life Member, Punjab Cricket Association and Formerly General Secretary, Punjab Cricket Association, Member/Officer bearer of Patiala Cricket Association (unregistered Body) and Trustee of Patiala Cricket Association (Trust) for causing financial loss to the Punjab Cricket Association, loss and prejudice to the Game of Cricket using his undue influence and due to conflict of interest and further, misuse of his status and position while discharging his duties as office bearer of Punjab Cricket Association and Treasurer, Board of Control for Cricket in India and also being a Life Member of the Punjab Cricket Association.
- ii) Sh. R.P. Pandove, Life Member, Punjab Cricket Association and Honorary Secretary of a fictitious Body namely, Patiala Cricket Association (unregistered Body) and Director, Administration, Punjab State Power Corporation Ltd. Patiala and brother of Sh. M.P. Pandove.
- iii) Sh. Gursewak Singh Walia, Life Member, Punjab Cricket Association, Former Honorary Secretary, Punjab Cricket Association and Former Treasurer of a fictitious Society namely,

Patiala Cricket Association (unregistered Body) and Secretary of Mohali Cricket Association.

- iv) Sh. Janak Raj Sachdeva, Life Member, Punjab Cricket Association and formerly, President and presently, Member of a fictitious Society namely, Patiala Cricket Association (unregistered Body).
2. That the aforesaid persons mentioned at Sr. No. (i) & (iii) have remained office bearers of Punjab Cricket Association and have discharged duties and responsibilities of the post of Honorary General Secretary/Honorary Secretary for several years.
 3. That persons mentioned at Sr. No. (i) & (iii) during their tenure as office bearers of Punjab Cricket Association, managed affiliation of a fictitious body (Patiala Cricket Association-unregistered Body) with Punjab Cricket Association. The aforesaid persons projected and claimed Patiala Cricket Association an unregistered Body to be the successor in interest of a duly registered body; Patiala District Cricket Association (Regd.) with Registrar, Firms and Societies, Punjab at Chandigarh.
 4. That it is a matter of record that Patiala District Cricket Association (Regd.) was in fact affiliated with Punjab Cricket Association but the aforesaid persons subsequently, projected that as if the aforesaid registered Association has been renamed as Patiala Cricket Association.
 5. That the persons mentioned named at Sr. No. (ii) & (iv) are actively associated with the affairs of Patiala Cricket Association an unregistered and a fictitious body and they in collusion and conspiracy with persons mentioned at Sr. No. (i) & (iii) have embezzled the funds/aid granted by Punjab Cricket Association for welfare and betterment of the Game of Cricket in Patiala.
 6. That persons mentioned/named at Sr. No. (i) & (iii) being in the helm of affairs of Punjab Cricket Association, were primarily responsible for transfer of funds/grants and subsidies for creation

of usage and creation of infrastructure to various affiliated District Cricket Associations.

7. That on record, during their tenure as Honorary General Secretary/Office Bearer of Patiala Cricket Association, the aforesaid persons mentioned/named at Sr. No. (i) & (iii) managed disbursement of maximum grant-in-aid/financial aid/reimbursements to Patiala Cricket Association, an unregistered body and a fictitious body run and managed by all the aforesaid persons mentioned/named at Sr. No. (ii) to (iv).
8. That the entity namely; Patiala Cricket Association is an unregistered body and by the same name, a Private Trust is in existence. The said Trust is also owned and managed by the aforesaid persons. The bank accounts of Patiala Cricket Association (Trust) were used for disbursement of financial aids/reimbursements given by Punjab Cricket Association but the said Trust is not affiliated with Punjab Cricket Association and thus, no funds could have been transferred in its accounts.
9. That the *modus-operandi* was/is that the money received in the accounts of the private Trust owned and managed by the aforesaid persons would be shown in the books/records of Punjab Cricket Association to have been transferred to Patiala Cricket Association, an unregistered fictitious body stated to be the successor in interest of a duly registered Society namely, Patiala District Cricket Association, the latter being defunct otherwise.
10. That the aforesaid persons are responsible for embezzlement and siphoning of grant-in-aids/reimbursements and other financial transactions which are in crores of rupees. This entire illegal process is in continuance for last couple of decades.
11. That the aforesaid persons managed and manipulated the game of cricket with maximum tournaments and other activities related to game of cricket concentrated in Patiala only. Not only, they

received financial benefits from tournaments conducted in Patiala but this also caused immense prejudice to the deserving players of other districts of Punjab. The very objective of Punjab Cricket Association was thus, failed by these persons for their own vested and selfish financial interests.

12. That on record, the aforesaid persons in conspiracy and in collusion with each other and some more persons, managed transfer of possession of government land in the name of their privately run and managed Trust namely Patiala Cricket Association (Trust). This happened in the year 1988-89, which is much prior in time the date (18.08.1995), which is claimed to be the actual date on which Patiala District Association was renamed as Patiala Cricket Association, which is in any case, a separate legal entity then the Patiala Cricket Association (Trust).
13. That after obtaining the possession of the government land, the privately owned, run and managed Trust of these persons thereafter, raised construction of a Cricket Stadium from the funds availed from Punjab Cricket Association using the influence of persons named at Sr. No. (i) & (iii). The Stadium was named after the family member of person named at Sr. No. (i) & (ii).
14. The management and operation of the Stadium so constructed was entrusted to another family run Trust of persons named at Sr. No. (i) & (ii) namely, 'Dhruv Pandove Trust, Patiala', which would charge rentals and other charges for facilities of the Cricket Stadium from general public and cricket teams.
15. That recently, the entire illegal transaction as regards transfer of possession of land in favour of a private Trust came to the notice of Government of Punjab and after following due process, the land has been ordered to be returned/transferred in the name of Government of Punjab.

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16. That the claim of the aforesaid persons that Patiala Cricket Association is a Society, which is successor in interest or Patiala District Cricket Association, a registered Society turned out to be false with registration of a Society namely, Patiala Cricket Association in the year 2021 (Registration No. DIC/OL/Society/3265/2020-2021 dated 23.02.2021) by the persons having genuine interest in the game of Cricket. It is trite to mention that the competent authority would not register two societies in the same name in the same State.
 17. That in view of the above, a clear case of conflict of interest and *prima-facie* siphoning of an embezzlement of funds is made out against the aforesaid persons.
 18. That the original and relevant records of Patiala Cricket Association, Patiala Cricket Association (unregistered Body) and Punjab Cricket Association (Trust) and lastly, of the Dhruv Pandove Trust may kindly be summoned and the entire inquiry be concluded a time bound manner.
 19. That the complainant prays for proper inquiry against the aforesaid persons in terms of Sub-Rule (2) & (3) of Rule 46 of the Memorandum and Rules and Regulations of Association and declare and award following penalties and punishments to the aforesaid persons: -

INTERIM RELIEF/DIRECTIONS:

- i) The original bank accounts statements alongwith bank account opening forms with original account opening dates be summoned forthwith;
- ii) The CEO, Punjab Cricket Association be directed to immediately take steps for freezing of all the bank accounts of Patiala Cricket Association (unregistered body) and of the Patiala Cricket Association (Trust);

- iii) The conflict of interest as intractable and thus, the Life Membership of the aforesaid persons be immediately suspended as interim relief/measure so that they do not interfere in free and fair inquiry process;
- iv) Further, during the pendency of the inquiry all further grant-in-aids/reimbursements be ordered to be immediately stopped/suspended and affiliation of Patiala Cricket Association (unregistered body) be immediately suspended;

FINAL RELIEF

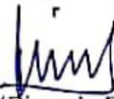
- i) The aforesaid persons be completely barred for life from involvement with the game of Cricket;
- ii) Affiliation of Patiala Cricket Association (unregistered body) be cancelled;
- iii) Suitable monetary penalty be imposed against the aforesaid persons of recovery of embezzled amount and restitution of all monetary benefits illegally availed by them be ordered;
- iv) Any other suitable penalty be imposed against the aforesaid persons in addition to the relief prayed hereinabove including for a direction to the Apex Council/its CEO to file a proper criminal complaint to the law enforcement agencies and/or file a recovery suit in accordance with law to recover the amounts/grant-in-aids/reimbursements made by Punjab Cricket Association etc. illegally siphoned off/embezzled by the aforesaid persons.

Place:

Patiala

Date:

24-05-2021



(Piyush Rana)

COMPLAINANT

Mobile No. 9888805330

Note: Affidavit is attached.

**BEFORE HON'BLE MR. JUSTICE H.S. BHALLA (RETD.),
THE ETHICS OFFICER-CUM-OMBUDSMAN,
PUNJAB CRICKET ASSOCIATION, S.A.S. NAGAR (MOHALI).**

Piyush Rana ... Complainant

Versus

Sh. M.P. Pandove & Others ... Respondents

AFFIDAVIT

Affidavit of Piyush Rana, aged about 48 years, son of Late Sh. Jawahar Lal Rana, House No. 125/126, Street No. 22, Tripuri, Patiala

I, the above named deponent do hereby solemnly affirm and declare on oath here as under:

1. That the accompanying complaint has been drafted on the instructions of the deponent.
2. That the deponent has read the contents of the accompanying complaint and the deponent has signed the same after accepting it to be correct.
3. That no part of the accompanying complaint is false and nothing has been concealed therein.

PLACE: Patiala
DATE: 24.05.2021


DEPONENT
(PIYUSH RANA)

VERIFICATION:

Verified that the contents of the above affidavit are true and correct to my knowledge. No part is false and nothing has been concealed therein.

PLACE: Patiala
DATE: 24.05.2021


DEPONENT
(PIYUSH RANA)