

**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](mailto:justicehsbhalla@gmail.com)**

M.A. NO. \_\_\_\_\_ OF 2022

COMPLAINT NO. \_\_\_\_\_ OF 2022

**MEMO OF PARTIES**

Yadvinder Singh son of Sh. Rajinder Singh, Village- Kohar Singh Wala, Post Office- Kohar Singh Wala, Kore Singhwala, Ferozepur, Punjab-152002.

**...Complainant**

**Versus**

- i) Firozpur District Cricket Association having its Head Office at 8<sup>th</sup>, The Mall, Opposite Town Hall, Krishna Marg, Firozpur City-152002 through its Honorary Secretary.
- ii) Sh. B.K. Mehta son of Dr. H.C. Mehta, Mob. 8847305200, Former Honorary Secretary for Life (till 01.01.2017), Firozpur District Cricket Association having its Head Office at 8<sup>th</sup>, The Mall, Opposite Town Hall, Krishna Marg, Firozpur City-152002 and a self styled Honorary Secretary of Ferozepur District Cricket Association, 32, Kirti Nagar, Ferozepur City.
- iii) Sh. Ashok Manchanda son of Sh. J.R. Manchanda, Treasurer, Firozpur District Cricket Association having its Head Office at 8<sup>th</sup>, The Mall, Opposite Town Hall, Krishna Marg, Firozpur City-152002  
**2nd Address:** Mohalla Dharmapura, Firozpur,
- iv) Inderjit Sagggar, General Secretary (till 11.03.2021), Firozpur District Cricket Association having its Head Office at 8<sup>th</sup>, The Mall, Opposite Town Hall, Krishna Marg, Firozpur City-152002 Mob. 9872822369

**2nd Address** #5 Kanshi Nagri, Ferozepur City, Punjab.

- v) Sh. Ankit Maini, s/o Sh. Raj Kumar Maini, Honorary General Secretary, Ferozpur District Cricket Association 32, Kirti Nagar, Ferozpur City. Email Id: fzrdca@yahoo.com Mobile : 8699450049

**2<sup>nd</sup> Address**

Kothi No 16, Model Town, Ferozpur City, Punjab.

- vi) Ferozpur District Cricket Association 32, Kirti Nagar, Ferozpur City through Honorary General Secretary, Sh. Ankit Maini, Email Id: fzrdca@yahoo.com
- vii) Sh. Nitin Mehta S/O Dr HC Mehta & B/O Sh. BK Mehta Office Secretary, Ferozpur District Cricket Association, 32, Kirti Nagar, Ferozpur City.
- viii) Sh. Kartikeya Swaroop S/O of BK Mehta, Member Apex Council, Punjab Cricket Association (representing Ferozpur DCA) [kartikeyas.mehta@yahoo.com](mailto:kartikeyas.mehta@yahoo.com)
- ix) Sh. Ravinder Pal Ohri, President, Ferozpur District Cricket Association, 32, Kirti Nagar, Ferozpur City
- x) Sh. Ashok Paul Sharma, Vice President, Ferozpur District Cricket Association, 32, Kirti Nagar, Ferozpur City
- xi) Sh. Parmod Sharma, Treasurer, Ferozpur District Cricket Association, 32, Kirti Nagar, Ferozpur City
- xii) Sh. Ajit Kumar, Joint Secretary, Ferozpur District Cricket Association, 32, Kirti Nagar, Ferozpur City

**... Respondents**

- xiii) Chief Executive Officer, Punjab Cricket Association, IS Bindra Cricket Stadium, S.A.S. Nagar (Mohali), Email ID: [ceo@cricketpunjab.in](mailto:ceo@cricketpunjab.in)

**... Proforma Respondent**

**APPLICATION FOR PREPONMENT OF THE MAIN  
COMPLAINT AND FOR ISSUANCE OF INTERIM  
DIRECTIONS.**

**RESPECTFULLY SHOWETH:**

1. That the main complaint is pending adjudication before this Hon'ble Court and is listed on 14.05.2022
2. That it is matter on record that Hon'ble Justice Dr. Bharat Bhushan Parsoon, Enquiry Officer, Former Judge, Punjab and Haryana High Court, Chandigarh has submitted Fact Finding / Discreet Inquiry Report on the basis of order dated 26.10.2021 passed by the Hon'ble Ethics Officer-Cum-Ombudsman, Punjab Cricket Association, S.A.S. Nagar (Mohali). The report is already part of the records.
3. That the issues indicated in the Inquiry Report entail large scale malpractices and illegalities in the functioning of the Respondents and their dealing with Punjab Cricket Association having financial implications and apparent misuse of grants and other undue financial benefits/transaction given by Punjab Cricket Association.
4. That on 24.04.2022, a meeting of the Apex Council, Punjab Cricket Association is scheduled. The Respondents are on the Apex Council and considering their conduct as highlighted in the inquiry report, they should not be allowed to attend and participate in the meeting of the Apex Council as they would influence the decision of the Council.
5. That further, in view of the inquiry report submitted by the Hon'ble Retired Judge appointed as Enquiry Officer by this Hon'ble Court, status quo should be ordered qua the assets and bank accounts of the Respondent Associations. Further, the Respondent Association and their officials should be restrained from altering the records and withdrawing any further amounts from the bank accounts of the Respondent-Associations.

6. That the complainant prays for adjudication of the issues which have surfaced in Inquiry Report and all other aspects against the aforesaid persons in terms of Sub-Rule (2) & (3) of Rule 46 of the Memorandum and Rules and Regulations of Association.
7. That the present application is being filed for bona-fide reasons and in case the interim relief as prayed for in the present application is not granted, it is likely that to dilute the impact of the inquiry report, the Respondents would alter the status of the records and dispose of moveable as well as immoveable assets of the Respondent-Associations and would thus affect the affective and proper adjudication of the issues involved in the main complaint.
8. That *prima-facie* case the balance of convenience is in favour of the Complainant and against the Respondents.
9. That no harm or loss would be caused to the Respondents in case the interim directions as prayed for are passed by this Hon'ble Court.
10. That in view of the above, the main case may kindly be preponed to any date before 24.04.2022 and following interim directions may kindly be passed:-
  - (i) The Respondent-Associations and/or their Officials should be restrained from attending the Apex Council meeting scheduled on 24.04.2022.
  - (ii) The Respondent-Associations and/or their Officials should be restrained should be restrained from altering the status of the records and from disposing of the moveable and immoveable assets of the Respondent-Associations till further orders.

Place:

Date: 19-4-2022

Yadvinder Singh  
(Yadvinder Singh)  
COMPLAINANT

Mobile No. 8360557053

Email : yadvindermatharu48@gmail.com

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

Yadvinder Singh

...Complainant

Versus

Firozpur District Cricket Association &amp; Others

... Respondents

**AFFIDAVIT**

Yadvinder Singh son of Sh. Rajinder Singh, Village- Kohar Singh Wala,  
Post Office- Kohar Singh Wala, Kore Singhwala, Ferozepur, Punjab-  
152002.

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: *CH*  
DATE: *19/4/22*

*Yadvinder Singh*  
DEPONENT  
(YADVINDER SINGH)

**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: *CH*  
DATE: *19/4/22*

ATTESTED AS IDENTIFIED  
*Shadhna Trikha*  
SHADHNA TRIKHA  
NOTARY, Chandigarh  
*19/4/22*

*Yadvinder Singh*  
DEPONENT  
(YADVINDER SINGH)

Certified that the Affidavit/SPA has been read over and explained to the deponent / executant who seemed particulars to understand the same at the time of making thereon

I identified the deponent/declarant executant who has signed the document in my presence.

Signature