

# TAPAS KUMAR DWIBEDI

Advocate : Orissa High Court

Application under Article 311(2)(b) of the Constitution of India  
From Advocate T.K.Dwibedi & Associates (advocatetkdwibedi@yahoo.com)

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To: homesec.od@nic.in

Date: Wednesday 25 September, 2024 at 09:11 pm IST

The Secretary  
Home Department  
Government of Odisha  
Bhubaneswar, Odisha

Subject: Application under Article 311(2)(b) of the Constitution of India for the removal of the tainted and ex-inspector-in-charge of the Bharatpur Police Station of Bhubaneswar-UPD, Mr. Dina Krushna Mishra.

Sirs,

This is to inform you that it is now a universal fact that the above-named IIC is an extortionist, and land grabber and operates an extortion and Paisa Vashooli Racket in collusion with the other policemen and senior police officers.

01. That, he had demanded Rs.50,000/- from an owner of the Cycle Stand during Bali Yatra in 2022 when he was the IIC of the cantonment police station under the commissioned police-Cuttack-UPD. He also threatened the owner that if the extortion demand of Rs.50K is not fulfilled then he will not allowed the run the cycle stand during the Bali-Yatra festival. he has also caused injuries to other cycle stand owners due to this deceitful means.

02. That, the IIC being the tainted officer has been made the Inspector in charge of the model police station like the Bharatpur Police station under the Bhubaneswar-UPD, and the same has been made under a deep-rooted criminal conspiracy, intentionally, dishonestly, fraudulently, and for the wrongful gain as the bribe are collected by the competent authority for the same as the posts and police stations are bought and sold in the Odisha Police Department.

03. That, The tainted IIC demanded Rs.4.50 lakh (Rs. Four Lakh Fifty Thousand Only) from one Biswajeet Swain who resided in Germany for his work and having a house in the Housing Board colony in Bhubaneswar and to facilitate the vacancy from the illegally occupied house from the possession of the local corporation Deepak Mishra. No FIR against the accused corporator ever registered and the house is now under illegal possession of the IIC and the IIC has sub-let the same to another person and taking monthly rent illegally and arbitrarily.

04. That, The IIC also demanded a bribe from one Mr. Devendra Bhutia for the registration of the FIR in the bike theft case on Dt. 28-08-2024. The victim ran pole to pillar for the registration of FIR, The ACP and DCP refused to register the FIR also and when the matter was highlighted in the media then only the same was registered on Dt. 01-09-2024 only but the police compelled the victim to write the Date of the Incident as 30-08-2024 to cover up their sin or so that the acquittal should be provided to the accused in the court as he is the partner in crime and one of the main sources of illegal income for the policemen. The complaints have been filed against the IIC before as the Bike has not yet been recovered even if the Constable recognized the thief from CCTV footage afterward the victim was told that his bike was dismantled and the engine was used in a boat.;

05. That, the IIC has Falsely Implication and caused the custodial torture of Soumya Ranjan Sethi an SC community member and his FIR did not get registered in the Bharatpur PS. on Dt. 06-05-2024. The victim has been detained in the police station for hours illegally and arbitrarily even if he was suffering grievous injury caused by the Opp. Party. The evidence, the date of the facts, and the incidents have been tempered by the IIC and ACP to provide the acquittal to the accused people. The IIC and the ACP compelled the victim to compromise with the accused and withdraw the case against the accused people who caused the grievous injury to the victim. SI Sagarika Rath and SI Subrat Kumar Behera have assaulted the victim in the police station, misbehaved using caste-based slang, and assaulted the victim in the police station at the instigation of IIC and ACP. The DCP Prateek Singh refused to take cognizance of the matter and did not inspect the police station under Odisha PMR No. 37(a).

C/o. Advocates' Chamber, Sector-6, Markat Nagar  
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06. That, the IIC in collusion with the other policemen has sexually harassed the fiancé of the Army major in the Bharatpur Police Station on Dt. 15-09-2024 and had detained the duo in the police station for 14 hours. The Army Major was kept in the Hazzat illegally. They have been implicated in the false criminal case by labeling the heinous crime as an attempt to murder, attesting the duo illegally, violating the rule of law, the direction of the competent authority(s), and the guidelines of the apex court. The department has suspended the erring IIC and multiple crimes have been registered against him by the CID-CB.

07. That, the complainants being the practicing advocates of Hon'ble Orissa High Court, acquitted with the modus operandi of the erring IIC, lawyer of the victim of the crime committed by the IIC, victims have reason to believe that the erring IIC has committed more offense such are waiting to be disclosed.

08. That, the CCTV camera and recording system of the Bharatpur PS have been removed under a deep-rooted criminal conspiracy, intentionally, dishonestly, fraudulently, and for the wrongful gain disobeying the rule of law, the direction of the competent authority(s) and the direction of the apex court so that Paise Vashooli Racket can be operated smoothly and evidence can be erased.

09. That, the complainants have reason to believe that the erring IIC is protected by the other corrupt senior police officers and public servants, police departments, and legislators who need to be removed from the police department in the interest of public and lost integrity.

10. That, " A Police Officer and a policeman who loses his head in handling a situation is not fit to be a member of a police force", ( Sardar Vallabhbhai Patel, Former Home Minister, Govt. of India. ). "Yours ( Police ) is the responsibility to maintain the prestige of the government and protect the honour of the citizen. It is not enough if you only detect crime and bring the offender to book. You must try to win the affection of the people....."

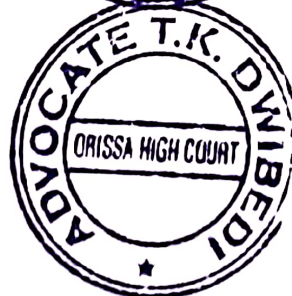
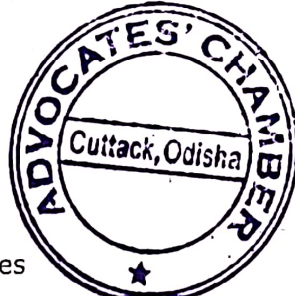
So, you are requested to make further arrangements for the removal of the erring IIC from the police force forever otherwise the domiciles of the state will not visit the police station where he will be appointed.

Thanking you.

Yours Faithfully,

*Tapas Kumar Dwibedi*

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