

Date : 12th January 2022

To :

The Hon'ble Lokayukta of Maharashtra,
Justice Shri V.M.Kanade.

Copy to : Hon'ble Governor of Maharashtra,
Shri Bhagat Singh Koshyari.

Copy to : Hon'ble Chief Justice of India, Shri N.V.Ramana.

Copy to : Police Officer-in-Charge, Navghar Police Station.

Copy to : Dean, Sir J.J.Group of Hospitals.

Copy to : Joint Commissioner, FDA, Gr.Mumbai.

Copy to : Directorate of Health Services, Govt of Maharashtra.

Copy to : Department of Medical Education & Drugs, Govt of Maharashtra.

Copy to : Health Secretary, MOHFW, Government of India.

Copy to : Director, Directorate of Food & Drugs Administration,
Government of Goa.

Subject : Complaint No. 4156 dated 31/10/2019

Hearing on 06th January, 2022

- a) I am shocked and perturbed after the hearing. You have still not realised that my wife was "Murdered". Poisoned and left sinking to her death. What caused her death was suppressed by doctors and drug manufacturer, Cipla Limited. Right to life, cut short by criminal offenders still roaming free. "No FIR for 5 years in the largest Democracy in the World"? In the land of Mahatma Gandhi?
- b) I request for an early Reply to enable me to proceed and try to save lives of citizens endangered by this dangerous network - Cipla-Doctor-FDA-CDSCO.
- c) Law Enforcers and Protectors of People are least concerned for lives sacrificed.

Respected Sir,

1. It was absolutely shocking from the Hon'ble Lokayukta of Maharashtra (Protector of People) to have betrayed my trust and sided with abusers of "Rule of Law" and who are protecting criminal offenders.

You were speaking on behalf of those you were supposed to take action against; for gross dereliction of duty as public servants and colluding with criminal offenders.

Rather, you tried to silence the aggrieved citizen and complainant. You indulged in mocking the murder of my wife by ridiculing the aggrieved while protecting the killers and law enforcers.

2. This matter prejudicially affects interests of all citizens of the country and not only my personal loss and tragedy. Lives of citizens matter and cannot be treated as guinea pigs for sacrifice.
3. Writ petition before the Supreme Court of India includes the following Respondents; **a)** Directorate of Health Services, Public Health Department, Mantralaya, Government of Maharashtra, **b)** Directorate of Medical Education and Research, Government of Maharashtra, **c)** Office of Dean, Sir J.J.Group of Hospitals, **d)** Commissioner of Police, Mumbai and lastly, **e)** Food and Drugs Administration, Gr.Mumbai.

Copy of writ petition before Supreme Court of India was sent to Hon'ble Lokayukta of Maharashtra for reference only, as matter is same in police complaint and complaint before FDA Maharashtra, Gr.Mumbai.

4. There have been multiple dis-respect for "Rule of Law" in this grievance.
5. At your first hearing, your opening statement was that I have done a commendable job. You also said that removal of name of treating doctor, Dr.Mihirgiri Goswami (Main accused along with Cipla Limited) by Maharashtra Medical Council (for Professional Misconduct) was far too less.
 - Why the sudden U-Turn now, trying to pick defects in my criminal complaints?
6. Your directions to me on 20th October, 2021 were specific; Actions and reliefs sought by me against public servants concerned, in each department of the state government. I complied with your directions and sent you three files.

A. Status of past three hearings prior to yourself being appointed as Hon'ble Lokayukta of Maharashtra.

That, after three hearings before the Lokayukta, the matter had remained on two points viz "Joint Investigation Report" and hearing before "Maharashtra Medical Council".

Maharashtra Medical Council passed their order by removing the name of Dr.Mihirgiri Goswami from its register. [Order-Platelets had dropped from 143,000 to 20,000 and WBC from 20,080 to 200. However, RMP ignored and

transferred the patient for surgery to another hospital. In spite of adverse reaction RMP had not taken action].

Joint Investigation Report has been explained in File C and proved as a conspiracy to give letter of pardon to Cipla and silence an aggrieved senior citizen seeking justice in death of his wife. Serious criminal offences were involved in this homicide.

B. Actions and Reliefs sought by me in the matter.

Against each of the public servants, I have given specific acts of dereliction of duty and colluding with criminal offenders.

Thus, trampling of the criminal justice system of the country. Manslaughter, sedition, bribery, corruption, etc.

C. My response to Fraudulent Joint Investigation Report of CDSCO-FDA.

7. Actions were sought (as described in file B) against each & every public servant involved in a) Directorate of Health Services, Public Health Department, Mantralaya, Government of Maharashtra b) Directorate of Medical Education and Research, Government of Maharashtra c) Office of Dean, Sir J.J.Group of Hospitals and lastly d) Food and Drugs Administration, Gr.Mumbai.

Actions were required to be taken by Law enforcement agencies :

- Navghar Police Station, Mulund, Mumbai.
- Food and Drugs Administration, Maharashtra, Mumbai.

8. Hearing on 6th January 2022

a) During the last hearing on 6th January 2022, your first question was

- **Reliefs sought by me.** This proves & confirms that I have been wronged in homicide of my wife by doctors, hospitals & Cipla Limited.
- I replied that FIR has to be registered by Navghar Police and case filed by Drug Inspector of FDA, Gr.Mumbai before 15th Court, Mazgaon, Mumbai (in 2015) has to be followed up.
- Doctors of Sir J.J.Group of Hospitals said that expert committee report was given by the three-member committee. **I reminded you that expert committee report was prepared in September 2018 and subsequently destroyed by the Dean's office.**

That, this was destruction of evidence in a homicide case and a serious criminal offence.

- I have produced reply to my RTI query from PIO of Sir J.J.Group of Hospitals dated 23.10.2019 that the report was confidential and could not be given to me **(Page 20)**.
- b) **I said that FIR has not been registered since 2017**, even after recording my statement for "Arrest Warrant".
- **You told me to go to "High Court"**. What was the purpose of hearings before the Hon'ble Lokayukta of Maharashtra for two years and two months if I was supposed to go to High Court? This could have been told to me before taking up my complaint dated **31/10/2019**.
 - **You said that I should have filed police complaint in 2014**. I responded that I was following my advocate Dr.M.S.Kamath of Consumer Guidance Society of India. It is there in my book, pages 117-120 (chapter 15).
I replaced him after finding out that he was also compromised. He was asking me to delete references to Adverse Drug Reactions of injection Rokfos from Cipla Limited. Immediately later, I filed police complaint. I told this to then DCP (Zone VII), Shri Sachin Patil also.
- c) Are facts emerging during a homicide investigation not admissible after three years?
- d) **You also said, that I say everyone is against me and all others are corrupt.**
- You are openly confronting the complainant and favouring criminal offenders and law enforcing authorities who have colluded with criminal offenders. Even after placing full evidence before you, you are trying to silence an aggrieved senior citizen seeking justice in murder of his wife? No humanity? **You need to justify your remark** and explain why corruption was not indulged in, by law enforcing authorities.
 - You have boosted the morale of accused public servants whom you were supposed to act against as "Protector of People". Can you prove to me a single wrong statement in my complaints against the criminal offenders and those who are supposed to uphold the "Rule of Law"?
 - This is similar to Justice R.K.Agrawal questioning the decree holder and not the "Guilty Appellants".
 - Each and every piece of evidence has been placed on record before the office of the Lokayukta of Maharashtra as also before the Chief Justice

of India who has said that "Justice is available for one & all".

- e) **You did not question the police officer, why FIR was not registered even after five years.** DCP, Shri Sachin Patil had asked complaint to be sent to Directorate of Health Services, Public Health Department, Government of Maharashtra.
- Why did D.H.S. hold back the complaint for seven months and then sent it back to Navghar police station, to be sent to Dean of Sir J.J.Group of Hospitals as matter falls under section 304A of the IPC ?
 - **Even section 304A is criminal.** Why no action for seven months by D.H.S. ?
 - Even after four hearings before the Hon'ble Lokayukta, they cannot answer on what basis does the matter fall under section 304A.
- f) **Where did the Expert Committee Report go missing?**
- Appointment of Expert Committee was on 29.08.2018 and report was to be submitted within a week (Tatkal basis) **(Page 21)**. Report was submitted as per reply to my RTI query **(Page 20)**. Navghar police are awaiting expert opinion **(Page 22)**.
 - Doctors of Sir J.J.Group of Hospitals present for the hearing said that all three expert committee members were present there and that they have submitted report to Navghar police. Report after three years?
 - **They did not send even this report to me, the complainant.**
This was just like they said in their RTI reply "That expert committee report was confidential and cannot be given to the complainant".
Also, that they had no authority to give details to police station for framing charges against the accused and register an FIR.
What was the objective of sending my complaint to D.H.S. ?
 - The doctors at Sir J.J.Group of Hospitals said that they are still awaiting report from Jupiter Hospital for actual cause of death. They are still waiting after 3 ½ years? whereas Medical Council has removed name of treating doctor from their register. Doctors & hospitals have been held guilty by Maharashtra State Commission.

Cause of death is there in police complaint **“Bone Marrow Biopsy Report”** stating **“Aplastic Bone Marrow”**.

- Expert Professors of Sir J.J.Group of Hospitals have to be told that Aplastic Anaemia occurred for not treating pancytopenia (WBC dropping from 20,080 to 2,300 and platelets from 143,000 to 95,000) for three days (from 12th June 2014 to 14th June 2014). That these were known side effects of injection Rokfos. What is being taught to students in Government Medical Colleges?
- **Every evidence is there in my police complaint.** Based on same evidences, Maharashtra Medical Council Committee comprising of 10 experienced doctors have given their **“Order of Removal”** of treating doctor, Dr.Mihirgiri Goswami from their register.
- Based on same evidences, Maharashtra State Commission bench of which one judge was a doctor have passed their order holding treating doctors (Dr.Mihirgiri Goswami, Dr.Satyen Mehta and Dr.Aafaque Dolare), Maruti Nursing Home and Platinum Hospitals **“Guilty”** of causing death of my wife.

They have been asked to pay compensation for losses incurred by me for **“Criminal Medical Negligence”** of all accused in police complaint.

This compensation is **“Not Reliefs Sought”** but **“Losses”** incurred by me due to **“Criminal Medical Negligence”**.

- As far as false cause of death given by Jupiter Hospital, advocate for Jupiter Hospital, Dr.Shenoy told the State Commission bench that there were no pleadings against Jupiter Hospital.

I had stated in my complaint **“Cause of death falsely given as septic shock with multi-organ failure”**

This was the reason that Dr.Kamath, my advocate had deleted the word **“falsely”**.

However, Jupiter hospital advocate, Dr.Shenoy did not say that **“Septic Shock with multi-organ failure”** was the actual cause of death.

He went on to give a **lecture on Aplastic Anaemia** to the judges. Why this lecture on Aplastic Anaemia if it was not the actual cause of death?

Dr.Abdul Hannan, Chairman of Expert Committee Panel as also Dr.Amit Supe and Dr.Dattatray Bhoir should explain why they cannot give written statements on the missing expert committee report.

- They have not given written statements for the hearings to the Hon'ble Lokayukta as they are aware that they will be trapped for false replies just like missing "Expert Committee Report".
 - My written statements as per file A has been ignored by the Hon'ble Lokayukta of Maharashtra.
- g) Each and every fact was recorded by me systematically in a book "Cipla Drug Trial" which I have sent to you also, and which you have appreciated. This book has been appreciated by several others also and most notably, **Canadian Drug Regulatory Authorities**. They have said that they appreciated time taken by me to write this episode and to inform them of further developments.
- h) **Regarding role of FDA, Gr. Mumbai**, I said that case filed at Mazgaon Court, Mumbai has not been followed up by the Drug Inspector of FDA, Gr. Mumbai working under FDA, Maharashtra Commissioner.
- You said that you have no jurisdiction over Mazgaon Court and that I have to go to High Court.
 - I re-iterated and told you that my point was "**Action not taken by FDA, Gr. Mumbai**" for six years. "Not yourself asking Mazgaon Court".
- i) You silenced an aggrieved senior citizen seeking justice in unnatural, untimely and merciless death of his wife.
- j) Can you say in your Orders (**which you said you will give**) that you have no jurisdiction over FDA, Gr.Mumbai? I will then ask the Hon'ble Governor of Maharashtra, Shri Bhagat Singh Koshyari, what is the option left before me?
- k) **You tried to dilute my complaint before FDA, Gr. Mumbai by saying that my complaint was for pricing.**
- You were questioning the aggrieved citizen whom you were supposed to protect and not corrupted public servants.
 - You did not bother to confront FDA Joint Commissioner, **specially called for the hearing**, regarding facts placed before you in my writ petition before the Hon'ble Supreme Court as also Reliefs/Actions sought by me

against the public servants sent to you as per your directions on 20th October 2021.

- That I had given my complaint dated 16.08.2014, addressed to Cipla on ADRs to the Assistant Commissioner (Zone 4). **Why is there nothing about Pricing in complaint before the Mazgaon Court?**
 - **That the same Assistant Commissioner (Zone 4) was subsequently arrested in his office by ACB** for accepting a bribe. This evidence (media report) is also placed before you. **And you ridiculed me in the hearing?**
- l) My complaint was being suppressed by both drug manufacturer, Cipla Limited as well as law enforcement agency for drugs (FDA) at **Stage 1 itself**.
- Case filed before Mazgaon Court was not followed up for six years.
 - My name was not included as complainant in the matter. **Nothing about Pricing of drugs?** Nothing about ADRs of injection Rokfos.
 - My complaint had said that my wife, after being admitted to Maruti Nursing Home for six days was carried in a critical condition and finally succumbed to her death.
 - If case was filed based on my complaint, all points in my complaint should have been included as it was drug-related. They have manipulated my complaint and you as protector of people are siding with corrupted officers. Exactly opposite to role assigned to you by the Hon'ble Governor of Maharashtra.
 - I told you that I have sent more than 50 letters including RTI queries to FDA Maharashtra, Gr. Mumbai.
- m) You did not question the joint commissioner on false, baseless replies to my RTI queries (**Pages 23-24**).
- **Rokfos is manufactured by Cipla which comes under jurisdiction of FDA Goa.**
- Whom will residents of Mumbai go to? Goa? Why did they send sample in 2018 after Cipla was cornered in false explanations to FDA Goa ?
- **Drug Inspector of this administration has launched prosecution against Maruti Nursing Home and other concerned persons in the court.**

That was exactly my point that the case was not pursued. That was **"Corruption"**. I had given all these in my **file C** response to you. And you say I am alleging false charges of corruption? **I deserve an answer.**

- **There is no sub-standard drug report in the record available in this office.**

Is aggrieved supposed to prove sub-standard quality? Who is supposed to follow statutory guidelines in Drugs and Cosmetics Act, 1940 & Rules thereof, if not drug manufacturer and FDA, Maharashtra, Gr.Mumbai? FDA Gr. Mumbai did not question Cipla why laws were violated. Or on false statements to FDA Goa Director? The entire world must be mocking at our criminal justice system.

- n) **I have submitted proof of sub-standard drugs manufactured at Cipla Goa** in warning letter by USFDA to Cipla CEO Shri Umang Vohra **(Page 25)**. Detailed warning letter is attached to my complaint to Chief Justice of India against Lokpal of India, copy sent to you.

- o) **I have also submitted reply by MOS Health in Parliament (Page 26).**

That Maharashtra tops list of drug samples failing FDA tests. Drugs mixed with corn starch, potato starch and chalk. Drugs not containing prescribed ingredients which was exactly the case, in death of my wife.

Hence, in spite of repeated requests to Cipla & FDA Maharashtra, the ADRs were hushed up and not investigated as per statutory guidelines.

- p) Disclosure by MOS, Health in Parliament and my exposure of CDSCO-FDA-CIPLA network is in itself cause for investigation & prosecution of FDA officers. An SIT comprising of Jurists and eminent citizens should advise the governments in the interest of the nation.

- q) **My letter dated 14th May 2018 to Joint Commissioner, FDA Gr. Mumbai, was for action against Cipla.** They sent sample in 2018 to Govt lab and used the same for conspiracy in bogus joint investigation by CDSCO and FDA.

- Why did they (Cipla & FDA, Gr. Mumbai) not send sample in 2014-2015?

- r) **You did not question the joint Commissioner of FDA, Gr. Mumbai on bogus joint investigation.** That the same drug inspector, after not following up on the case for six years, says matter is sub-judice?

s) **Why did you say “Don’t threaten me”** Why? I was only talking to you, arguing my points. In the previous hearing also, you got annoyed for me for asking a simple question and gave a date after 2 ½ months and that too after appreciating my work initially. What is your objective ?

- It is two years and two months since my complaint before the Lokayukta of Maharashtra.
- Let the criminal offenders kill the aggrieved family members also and let everyone, including corrupted law enforcement authorities go scot-free in the largest democracy in the world.
- Matter pertains to healthcare of the entire Nation being sabotaged and this is the response to my efforts by Protectors of People (Lokpal of India and Lokayukta of Maharashtra).

9. Joint Investigation Report by CDSCO & FDA :

I have given my response to Joint Investigation Report of CDSCO-FDA in **file C** and explained para-wise that it was a bogus investigation and bogus report prepared by CDSCO-FDA. Serious crimes against humanity protected by none other than Ministry of Health & Family Welfare officials.

Following evidence documents are attached for further clarity and proof that Joint Investigation Report was a Fraud.

- a) Warning letter dated 18/01/2018 for legal action against Cipla by FDA Goa Director (**Pages 27-28**).
- b) After false explanation by Cipla, letter from FDA Goa Director to DCG(I) for action to be taken against Cipla (**Page 29**).
- c) Letters from CDSCO Drug Controllers (4 letters) to National Coordination Centre, Pharmacovigilance Programme of India, Indian Pharmacopoeia Commission (IPC).

Letter from DCG(I) dated 26/07/2018 (**Pages 30-31**).

Letter from ADC(I) dated 10/09/2018 (**Pages 32-33**).

Letter from DDC(I) dated 30/11/2018 (**Pages 34-35**).

Letter from ADC(I) dated 05/12/2018 (**Page 36**).

As you can see, the drug controllers were talking of “**Compensation**” which goes to prove, criminal offences were committed under Drugs & Cosmetics Act, 1940 and Rules thereunder.

- d) Letter dated 10th January, 2019 from Secretary-cum-Scientific Director of Indian Pharmacopoeia Commission, Dr.G.N.Singh to the complainant that matters related to clinical trials and adverse drug reactions/death in this country are regulated by the DCG(I) **(Page 37)**.
- e) U-Turn by FDA Goa Director – **“No Action Letter”** dated 21/03/2019, instead of legal action, as warned a year earlier to Cipla **(Page 38)**.
- f) Letter from CPGRAMS dated **25th March 2019** for feedback on resolution of my grievance and my reply to the same **(Pages 39-40)**. I replied that DCG(I) has to order immediate cancellation of Cipla licence for playing with lives of citizens. Why did DCG(I) violate Rule of law?
He did not tell me about Joint Investigation Report of **20th March 2019** just five days ago organised by him. All-out conspiracy by FDA & CDSCO to favour Criminal Offender, Cipla.
- g) In response to my RTI Query to CDSCO dated 14/09/2019, it said that CDSCO Subject Expert Committee (Analgesic & Rheumatology) held meeting on **11.04.2019** and deliberated on the complaint received regarding use of drug Zoledronic acid and opined that the reported adverse reactions like Arthralgia, Myalgia, bone pain, etc are **known side effects of the said drug (Page 41)**.
- Surprisingly, CDSCO did not say that there was a Joint Investigation Report (conducted by themselves) dated **20th March 2019** i.e. just three weeks prior to SEC meeting.
 - Surprisingly, CDSCO did not deliberate on other known serious side effects of Zoledronic acid **viz petechial rash & pancytopenia**. These are typical symptoms and characteristic features of Aplastic Anaemia. My wife died from Aplastic Anaemia. They care a damn for lives of citizens!
- h) **[Summarised Remarks by Joint Investigation Team :**
- As per in-patient records available with M/s Maruti Nursing Home, Mulund, Mumbai, it was observed that only single dose of drug Zoledronic acid IV was administered to Smt. Kamini Barkur on 09/06/2014 and said drug was not administered to her again during her hospitalisation in M/s Maruti Nursing Home till 14/06/2014.

Reply by complainant –There were no allegations of double dose. Is this remark endorsement of single dose of cancer injection for stiff neck?

- **As per Joint Investigation Team**, it is observed that Smt. Kamini Barkur was hospitalised in Maruti Nursing Home, Mulund, Mumbai for treatment of Cervical Spondylitis & Stiff Neck and it is not a case of clinical trial as defined under Rule 122-DAA of Drugs and Cosmetics Rules 1945.

Reply by complainant – If it was an authorised trial, where was the question of police complaint? “Stiff Neck” is not in indications of use of Zoledronic acid and hence it was an **unauthorised secret trial**.

Treating doctor has said in meeting held on 22nd August 2014 (to reveal causes leading to death of my wife) that he will never give again. That his regular brand was Zobone and Rokfos was his new brand which caused the disaster. Why should he be bothered of giving it. Meeting was recorded and transcripts have been submitted in police complaint.

Mediclaim doctor, Dr.Dubey, attached to Maruti Nursing Home as Accounts Officer & also selling drugs illegally purchased by Maruti Nursing Home to other hospitals said that he goes to several hospitals “It was his responsibility to see, there was no problem to doctor or the patient”. Who gave him this responsibility, other than Cipla Limited?

- **As per Joint Investigation Team** – As complaint is related to adverse drug reaction, opinion of National Coordination Centre for Pharmacovigilance Programme of India, IPC, Ghaziabad may be obtained to take necessary action in the matter. Also concerned specialty expert’s i.e. Rheumatologists, Intensivists, TB Chest specialist etc. may be sought to ascertain lapses in the standard of care administered, if any?

Reply by complainant – Opinion was from sought from IPC four times in five months as per **evidence documents 30-36** stated above. It was only after Dr.G.N.Singh said in letter dated **10th January, 2019 (Page 37)** to the complainant that clinical trial induced adverse drug reactions/death are handled by DCG(I) that, Bogus Joint Investigation was conceived and organised by DCG(I).

Suspected Koch's - Clinical co-relation and follow up was recommended in MRI report of **10th June 2014** itself, but treating doctors at Maruti Nursing Home were only interested in suppressing ADRs of injection Rokfos. TB was never proved as surgery was never performed.

- **As per Joint Investigation Team** – In view of inadequate information available with respect to patient history, other drugs administered & sequence of events occurred after discharge of patient from M/s Maruti Nursing Home, Mulund, clinical investigation reports as well as exact cause of death (Post Mortem findings, if done); it is difficult to comment on whether there was lapse in standard of care administered.

Reply by complainant – Joint Investigation was conducted three months after State Commission had held doctors and hospitals guilty of causing death of my wife. There were **1,500 pages of in-patient records** of all three hospitals in two civil suits before **a) Medical Council** and **b) Maharashtra State Commission**.

Patient history was noted by Dr.Aafaque Dolare as **“Pre-morbidly Healthy” “No Major Illness in the past” “No Addictions” “No Known Allergies”**. **Cipla linked imaginary diseases** (arthralgia, monoplegia, spinal tuberculosis, bone tuberculosis, **paralysis**) on the deceased to imaginary treatment (steroids & anti-tubercular therapy) for the same.

There was no need of post mortem report as Bone Marrow Biopsy Report revealed **Aplastic Bone Marrow** which was the cause of death.

Lapse in care is demonstrated in two Judgements and removal of name of Dr.Mihirgiri Goswami from Medical Council Register].

10. What has been explained in the aforesaid **paragraph 9**, was used by ADC(I), Shri Somnath Basu, to silence an aggrieved senior citizen seeking justice in homicide of his wife (**Pages 42-43**).

This letter was revised as per email communication in June 2021 (**Pages 44-46**). That some points were missed out in the earlier letter.

How can a single paragraph of a letter go missing in a printout from the computer? **Everything in this homicide were a bundle of lies and deceit.**

11. Cipla, in their last letter to me dated **26th June 2018** said that they will comply with directions of authorities as and when received (**Page 47**). They had both FDA and CDSCO in their pockets, proved in bogus joint investigation.

12. Cipla Limited finally reported serious ADRs of injection Rokfos five years later to FDA, PVPI and DCG(I). Refer to **Pages 48-50**, reply to RTI Query.
13. Such a massive cover up. From Mumbai to Goa to CDSCO, New Delhi involving doctors, hospitals, FDA authorities in Maharashtra and Goa, Ministry of Health officers, Public Health Departments of Govt of Maharashtra, Deans and Professors of Government Medical Colleges.
14. Cabinet Secretary and his team of 6-7 deputies asked Health Secretary to take action on Cipla Drug Trial. Health Secretary is silent for 1 ½ years. Did not disclose Joint Investigation Report as **it was a FRAUD**.
15. **Is this not destruction of our nation ?** Hon'ble Lokayukta of Maharashtra has to give a reply in his orders.
16. Just Imagine my plight as an aggrieved senior citizen seeking justice in unnatural, untimely and merciless death of my wife, sacrificed as a "Guinea Pig" in a secret drug trial.
- She was poisoned and left to die and later abandoned by dumping her on her relatives in a critical condition.
 - Each and every regulatory authority and law enforcement agency have been compromised.
 - NCDRC (National Consumer Disputes Redressal Commission) President, Justice Shri R.K.Agrawal indulged in misconduct to prolong the mental agony of a senior citizen and his daughter.
 - The latest was the Lokpal of India and now, Lokayukta of Maharashtra.
 - I have been mentally tortured for seven and half long years.
 - It seems that there is no humanity left in our nation.
 - While corruption is at its peak by responsible persons in power.
17. You said that I have done a commendable job. Why the sudden U-turn now?
18. **Criminal acts by all the accused in my Police Complaint and Complaint before Food and Drugs Administration, Mumbai :**
- a) Administering cancer drug for curing stiff neck in a single day. This injection has to be administered only once in a year even for bone cancer patients.
 - b) Consent for administering this drug was not taken from patient or relatives.
 - c) Before diagnosing cause of stiff neck, this injection was administered.

- d) Precautions and indications of use as per Cipla booklet (15 pages) were not taken. There were multiple precautions to be taken.
- e) Contra-indication tests were not performed.
- f) After serious Adverse Drug Reactions (ADRs), watched the patient sinking to her death for five days at a stretch. WBC falling from 20,080 to 200 and platelets from 143,000 to 20,000.
- g) Sent the patient in a panic, two days ahead of scheduled date for surgery for cord compression (cause of stiff neck) in a critical condition.
- h) Patient was bed-ridden, unable to swallow even saliva, petechial rashes (bleeding from under the skin) appeared on her arms and legs and blood counts were at critically low levels. This was **"Attempt to Murder"**. Patient would not have survived surgery. There was hardly any blood left in body.
ADRs of Cipla injection would have been suppressed forever.
- i) False death certificate was given to suppress the ADRs which was not mentioned even in death summary. Aplastic Anaemia (cause of death) was also not included in death summary.
- j) Both Cipla and FDA Maharashtra violated statutory guidelines and did not investigate the injection causing serious adverse drug reactions never seen before. This, in spite of several requests and appeals by the aggrieved.
- k) Cipla deceived FDA Goa Director with fake chemistry and fake medical theses and pleaded ignorance of laws of the land.
- l) Cipla took the aggrieved senior citizen for a ride by lying to have investigated their drug and reporting to FDA, PVPI and DCG(I).
These have been proved as totally false.
Letters from all the three authorities to the contrary have been produced.
- m) Finally, the weapon that killed my wife (meaning serious Adverse Drug Reactions of injection Rokfos) was suppressed by around two dozen doctors at three hospitals. Cipla hushed up the serious ADRs for four long years. When law caught up with them, reported to Indian Pharmacopoeia Commission after five years.
- n) There was no need to hide known side effects of a drug unless 'FOUL PLAY' was involved in manufacture & 'TRIALS' conducted on vulnerable patients.

- o) The entire world has been educated now regarding vaccines, the time required to manufacture them and the investment lost if it fails. Cipla tried to conduct 'Clinical Trial' on a vulnerable patient in nexus with doctors and in the process an innocent life was sacrificed.
- p) Cipla, being a Listed company hid the serious fatal ADRs of their drug Rokfos from stakeholders, external auditors, secretarial auditors, external regulators, Bombay Stock Exchange as well as W.H.O.
- q) Cipla's last letter dated 26th June 2018 says that they will comply with directions of the authorities as & when received. This is acceptance of guilt.
- r) Both FDA authorities in Maharashtra and Goa as well as DCG(I), CDSCO (HQ) and DDC(I), CDSCO (WZ), Mumbai are exposed in a conspiracy to conduct bogus Joint Investigation and report to absolve Cipla Limited in multiple crimes against innocent citizens.
- s) Cipla Limited **avoided prosecution in 2014** by not following statutory guidelines in collusion with FDA, Maharashtra, Gr. Mumbai officers. Cipla directors **should have been prosecuted in 2015** after my complaint before FDA Maharashtra, Gr. Mumbai. Also, **later in May 2018** itself after their false explanations to FDA Goa Director were exposed.
- t) Can the hon'ble Lokayukta of Maharashtra please explain what is wrong in my statements on reliefs sought and charges of corruption against officers. I have given step by step explanation in all three files A, B and C.
- u) Penalty to Cipla is as per Section 27 of Drugs and Cosmetics Act, 1940 which is fine three times the value of drugs confiscated. Also, life imprisonment. Cipla violated statutory guidelines and did not allow their drugs to be confiscated. Besides, indulged in multiple malpractices over the years, cheating citizens.

As per proposed Draft Pharma Policy by **MODI 01 Govt** (not implemented), a marketing ban of one year and confiscation of stock. This should be imposed on Cipla Limited as compensation for cheating citizens over the years in nexus with FDA and CDSCO officers. This amount can be given to **PMJAY Fund for citizens**. Aptly, this will be "**Poetic Justice**" to the citizens.

Damage caused to the nation by selling sub-standard drugs over decades by bribing & corrupting FDA & CDSCO officers is unimaginable.

Cipla Interfered with freedom of press. Journalists investigating "Cipla Drug Trial" were silenced.

Cipla indulged in Fake Chemistry & Fake medical theories to FDA authorities. Students will learn fake science.

Cipla Chairman, Shri Yusuf Hamied hoodwinked the world with false claims.
Cipla destroyed the social fabric of our society.

These are anti-national seditious acts. Damage caused to nation is unimaginable. Ill-gotten wealth by corrupting and bribing law enforcing agencies deserve Rigorous Imprisonment for life for Cipla Directors.

19. My rights as a citizen in the largest democracy in the world has been denied.
- a) Right to life of my wife was cut short by Cipla and doctors. This grievance prejudicially affects interests of citizens of the entire country.
 - b) Justice has been denied for seven and half years to a senior citizen by governments both at the Centre and in the States of Maharashtra and Goa.
 - c) Officers at the helm of FDA and CDSCO are indulging in dangerous network, playing with lives of innocent citizens.
 - d) Each and every authority was compromised.
 - e) Level and extent of misconduct, gross dereliction of duty, colluding with criminal offenders by public servants is disgusting and disgraceful.
 - f) Unbelievable conspiracy to give letter that no action is taken against Cipla.
 - g) Conspiracy failed. FDA and CDSCO officers are trapped and dragged Lokpal full bench also.
 - h) The latest to betray citizen's trust is the Hon'ble Lokayukta of Maharashtra by refusing to take action against corrupted public servants colluding with criminal offenders.
 - i) Whole of India is consuming sub-standard drugs, which is investigated and exposed in fraudulent joint investigation.

j) Human rights are sacred. Fundamental rights necessary for existence in a civilised society has been denied by government authorities.

20. Since the very objective of my complaint before the Lokayukta of Maharashtra was never to be fulfilled as per your replies, I see no reason why my complaint was admitted in the first instance.

I have no other option but to send this communication and later your written orders to the Governor of Maharashtra & to the Chief Justice of India.

21. All evidence has been placed in five hearings before the Hon'ble Lokayukta of Maharashtra.

a) Orders implicating drug Rokfos (Medical Council & State Commission) are before the Lokayukta of Maharashtra.

b) Cipla Limited has admitted to the ADRs (**Pages 48-50**).

c) Treating doctor has admitted to ADRs in his affidavit before the Maharashtra Medical Council.

d) Side effects that occurred; Petechial rashes and pancytopenia are known side effects and typical symptoms & characteristic features of Aplastic Anaemia. My wife died from Aplastic Anaemia.

22. The following points are requested to be clarified by the Hon'ble Lokayukta of Maharashtra in his Orders :

a) Why no action has been taken against Dean of Sir J.J. Group of Hospitals for "Destruction of Evidence" in a homicide case "Expert Committee Report". The guilty would have been prosecuted in September 2018 itself.

b) Why FIR cannot be filed with Navghar police in my complaint even 5 years after statement was recorded for arrest warrant by Navghar police.

c) Why FDA Maharashtra, Gr. Mumbai cannot be ordered by the Hon'ble Lokayukta of Maharashtra to proceed with case at Mazgaon Court?.

d) Why Cipla Limited should not be included as an accused before Mazgaon Court? False statements by Cipla are on record. Bogus investigation has been explained to the Hon'ble Lokayukta.

e) Two orders implicating Cipla drug Rokfos causing ADRs have to be placed as evidence. These ADRs were left untreated resulting in death of my wife.

f) Why treating doctors at Maruti Nursing Home, Dr. Mihirgiri Goswami, Dr. Satyen Mehta and Dr. Aafaque Dolare should not be arrested forthwith.

Why purchaser, Dr.Meghal Goswami of illegal drugs at Maruti Nursing Home, causing death should not be arrested immediately?

g) Both treating doctor & Cipla Limited are on record that ADRs occurred. Why were they suppressed?

23.An aggrieved senior citizen had to resort to "Social Media" to share his plight before the world. The nation has been disgraced.

24.I have proved to the world and explained in my 150 posters on Twitter & Facebook. Journalists investigating "Cipla Drug Trial" were silenced by their seniors. How Rule of Law in the largest democracy has been destroyed.

25.History will judge this Homicide. We got independence after our ancestors laid down their lives for the country. There were traitors then, and there are traitors now from within.

26. You told me "Trauma after death of my wife". Trauma was created by abusers of "Rule of Law" and now by Protectors of People (Lokpal & Lokayukta). I will not allow this trauma to be continued.

27.For the sake of protecting current and future generations of our beloved nation from this dangerous drug network, playing with lives of our citizens, I will ask the Chief Justice of India to grant me "Mercy Petition" "Death by Euthanasia". It will be an honour to lay down your life for the sake of your motherland. A new generation of Indians will emerge and awaken to restore the nation to its past glory lost due to traitors from within.

Awaiting your Orders at the earliest,

Thanking you,

Yours Sincerely,

Umeshchandra Barkur

(Complainant)

A-15, Neeta Apartments, Chaphekar Bandhu Marg, Mulund (East), Mumbai 400081. E-mail : umeshchandrabarkur@hotmail.com Cell : 98201 17923.