

IN THE HON'BLE HIGH COURT OF CHHATTISGARH
AT BILASPUR

WRIT PETITION (PIL) NO. OF 2026

PETITIONER : Jitendra Banjara, Aged about 32 years S/o Shri Baran Singh. R/o Dewalgarh District Mahasamund, CG. (Authorized by team IMIS, a public trust)

VERSUS

RESPONDENTS 1: UNION OF INDIA through its Secretary, Home Affairs Department New Delhi, 110001

2: Secretary, Department of Health & Family Welfare, Nariman Bhawan New Delhi, 110011

3: Director General, Indian Council of Medical Research (ICMR), V. Ramalingaswami Bhawan Ansari Nagar New Delhi, 110029

4: Director, National Institute of Virology (NIV) 20/ A Dr. Ambedkar Road Pune MH, 411001

5: Secretary, Department of Health Research (DHR) 2nd floor, IRCS Building -1 Red Cross New Delhi, 110001

6: Director, National Center For Disease Control (NCDC) 22- Sham

Nath Marg, Civil Line New Delhi,
110054

- 7: Secretary, National Disaster Management, NDMA Bhawan A-1 Safdarjung Enclave New Delhi, 110029
- 8: Director, Prime Minister's Office, South Block, New Delhi, 110011
- 9: Director General, Council of Scientific & Industrial Research (CSIR), through Anusandhan Bhawan, 2 Rafi Ahmed Kidwai Marg, New Delhi, 110001
- 10: Director, National Center for Disease Informatics and research (NCDIR), II Floor of Nirmal Bhawan, ICMR Complex Poojanhalli Road, Off NH-7, Adjacent to Trumpet Flyover of KIAL Kannamangala Post Bengaluru, 562110
- 11: Secretary, department of Aayush, Aayush Bhawan Block, GPO Complex INA, New Delhi, 110023
- 12: Additional Chief Secretary, Department of Health & Family Welfare; Mantralaya, Mahanadi Bhavan Naya Raipur, Atal Nagar Chhattisgarh, 492101

**WRIT PETITION UNDER ARTICLE 226 OF THE
CONSTITUTION OF INDIA FOR THE ISSUANCE OF
WRIT/WRITS AND/OR OTHER APPROPRIATE
DIRECTION/DIRECTIONS AND/OR OTHER
APPROPRIATE ORDER/ORDERS.**

1. **PARTICULARS OF PETITIONER (S):-**

As mentioned in the cause title.

2. **PARTICULARS OF RESPONDENT (S):-**

As mentioned in the cause title.

3. (A) **PARTICULARS OF THE ORDER AGAINST
WHICH THE PRESENT PETITION IS MADE:-**

By way of this Public Interest Litigation, the petitioner is hereby seeking direction from this Hon'ble Court to direct the concerned respondents to immediately provide substantial evidence and perform real time practical demonstration to prove the claimed particles are real physical entity as disease-causing particles called as virus or viruses; the living microorganisms i.e. bacteria, fungus, protozoa, nematodes & others causes disease/harm; furthermore the reality of immunity and immunization as per the claim & narrative of the medical microbiology respectively. That the petitioners attempts numerous correspondence with the respondents to get real evidence, but the respondents fails to provide and frequently admits they have no evidence/record to prove the existence of alleged disease-causing viruses and other microorganisms cause disease/harm to the alleged claimed hosts (eg. Human, animals & others). The germ theory of disease is the base of inhuman national health policies, waste of tax

payers money, putting in danger to the human life in the name of prevention and control measures. Hence, absence of the proof of Germ theory of disease, the petitioners seeking to direct to immediate shutdown/withdraw the anti-scientific/fabricated/fictional practice and entire scope of medical microbiology.

(B) SUBJECT MATTER IN BRIEF

Present writ petition under Article 226 of the Constitution of India is being filed by way of public interest litigation and the petitioner have no personal interest. The petition is being filed in the larger interest of public, that is, on behalf of all the public of India who were/are depriving from all the fundamental rights, facing torture, misguided in the name of alleged prevention & control measures on alleged viruses, living germs and alleged immunization. The petitioners attempts numerous correspondence requesting to the respondents but, the respondents has neither been provided evidence nor performed real time practical demonstration to prove the existence of alleged disease-causing viruses and the Germ Theory of disease is the real phenomenon happens in the nature. Hence, due to the Germ Theory of Disease public are miserably affecting since long because of alleged prevention & control measures without having verification of narrative of the germ theory of disease.

(C)(i) The present petition under Article 226 of the constitution of India is being filed by way of Public Interest Litigation and the petitioner has no personal interest. The petition

is being filed in the interest of public specially for all people of India who were depriving from fundamental rights, facing tortures, misguided and are being badly affected due to unproven, assumption based & non-verified narrative or policy of medical microbiology.

- (ii) That, the petitioner is filing the present petition on his own cost and not at the instance of someone else. The litigation cost including the paper work, traveling expenses of the petitioner, if any, are being borne by the petitioner himself.
- (iii) That, the source of information of the facts pleaded in this Public Interest Litigation is based upon the rules and laws framed by the Law-Making Bodies.
- (iv) That, the petitioner has sent representation before the respondent no. 2, 5, 6, 8, and 12 with this regard.
- (v) That, to the best of knowledge of the petitioner, no public interest petition (whether filed by the petitioner himself or by someone else) raising the same issued is filed before this Hon'ble Court or before any other court.

4. WHETHER ANY CAVEAT FILED, IF YES, WHETHER COPY OF THE PETITION SUPPLIED TO THE CAVEATOR;

No knowledge about the same.

5. REMEDIES EXHAUSTED;

The petitioner declare that the petitioner has no other remedy except to approach this Hon'ble Court looking to the facts and circumstances of the case.

6. MATTERS NOT PENDING IN ANY OTHER COURT OF LAW;

That, to the best of knowledge of the petitioner, no public interest petition raising the same issue is filed before this Hon'ble Court.

7. **DELAY, IF ANY, IN FILING PRESENT PETITION:-**

There is no delay in filing this petition.

8. **FACTS OF THE CASE:-**

Brief facts of the case are as under:-

- 8.1. That, the Petitioners and associates are medical professional, health experts, doctors, Microbiologists, Bio-informatician, Biotechnologists they have qualified of the M.Sc., B.Sc., MBBS, MD, MBBS, M.S. BAMS, DHMS, relevant to the matter. They have been practicing in different therapies like Ayurveda, Unanni, Homeopathy and naturopathy. The Petitioners and other associates doctors have been made various correspondences with the Respondent authorities seeking reliable evidence with respect to identification as disease-causing ability of the specific particles called as alleged viruses along with other alleged viruses of all alleged hosts directly obtained from uncultured original sample from the sick person to prove the existence and pathogenicity of it; secondly petitioners requested evidence of disease-causing ability other living germs but, the respondents has failed to provide. The petitioners requested through U/S 76 of Indian Evidence Act 1872 and U/S 12 of Public Records Act, 1993, RTI act 2005, e-mailing and other way of correspondences.
- 8.2. That, the petitioners investigated all the nuances/angles of practice of the medical microbiology and found that, the human society is

misguided by the unproven germ theory of disease. The reply of respondents contradicts to the sought evidence; each and every reply either out of the context, meaningless, fabricated, fictional and designed with being prejudice mindset. All the published articles called as alleged research papers don't follow the rule of the science hence all the laboratory works doesn't resemble to the reality or science as per narrative of the medical microbiology.

8.3. That, the petitioners are trying to best efforts to explain the difference between the reality and the fictional story designed by Medical Microbiology or the Germ theory of disease:-

Introduction of Microbiology and Medical Microbiology

That, there is a branch of Biology which deals with microorganisms (i.e. alleged viruses, bacteria, fungi, protozoa, parasites/ Eucarya, Archaea, etc.) called as microbiology.

Another sub-branch of microbiology states that microorganisms (germs) causes diseases in respective hosts i.e. humans, animals and plants, and deals with treatment phenomenon (often by Antimicrobial chemotherapy and alleged immunotherapy, etc) of particular claimed disease/symptoms of the claimed hosts that is called **Medical Microbiology**.

These are divisions of the medical microbiology are as follows:-

Virology, Bacteriology, Mycology, Parasitology, Pathology, Immunology, drug designing etc.

The claims of Medical Microbiologists:-

(i) That, there are non-living particles called as viruses, prions etc. causes disease or symptoms in human plants and animals.

(ii) That, the living microorganisms (i.e. bacteria, fungi, protozoa, parasites etc.) also cause disease or symptoms in human, plants and animals.

Some important terms found in the medical microbiology or germ theory of disease:-

(Excerpt is taken from the renowned text book i.e. Prescott, Harley, and Kleins Microbiology, 7th Edition/ Joanne M. Willey, Linda M. Sherwood, Christopher J. Woolverton / Chapter 33 Pathogenicity of Microorganisms. This text book was referred by ICMR during correspondence)

Virulence:- The term virulence [Latin virulentia, from virus, poison] refers to the degree or intensity of pathogenicity. As mentioned previously, pathogenicity is a general term that refers to an organisms potential to cause disease. Various physical and chemical characteristics (such as structures that facilitate attachment and molecules that bypass host defenses) contribute to pathogenicity, and thus virulence. Individual characteristics that confer virulence are called virulence factors (eg., capsules, pili, toxins).

Virulence is determined by three characteristics of the pathogen: **invasiveness**, **infectivity**, and **pathogenic potential**.

(i) Invasiveness is the ability of the organism to spread to adjacent or other tissues.

(ii) Infectivity is the ability of the organism to

establish a focal point of infection.

(iii) Pathogenic potential refers to the degree that the pathogen causes damage. A major aspect of pathogenic potential is toxigenicity.

(iv) Toxigenicity is the pathogens ability to produce toxins, chemical substances that damage the host and produce disease.

Microorganisms are also called germs as they are accepted as pathogenic agent. Therefore, the practice of medical microbiology also called as germ theory disease, the practice is going on from hundreds of years but, till date there is no record available of any independent investigation on the alleged methodology/practice of Medical Microbiology to revisit the claim/narrative.

8.5 That, various human, animal and diseases have been linked with either living micro-organisms or alleged non-living microorganisms. It means, as per the National Health Authority, all the communicable diseases manifests pathogenic effect of living-microorganism and alleged non-living microorganisms. Subsequently, all the treatment protocols and alleged therapy has been prepared to address all the communicable diseases, i.e. Vaccines, Anti-viral drugs, Antibiotics/antibacterial drugs, Anti-fungal drugs, Anti-parasitic drugs, Immunological drugs, Gene therapy, etc

8.6 That, till date, there is no substantial evidence available all over the world to prove the identification of any particle as alleged disease-causing virus. All methodologies, research papers related to alleged sars-related including other alleged

viruses too. The Petitioners found that, the research papers along with laboratory methodology, which was carried out to identify the alleged virus actually are fictional and fraudulent, which doesn't resemble to reality therefore that proves nothing. The hypothesis of disease-causing viruses has not been verified till date from its beginning i.e. alleged TMV, hence the narrative made for alleged viruses are disproved as hoax and fictional claim.

8.7 That, it is important to mention here that there is no research work has ever been carried out to prove that Living-Microorganisms (bacteria, fungi, protozoa, parasite etc.) are harmful or disease-causing agent. Therefore, no research paper is available in public domain. Respondent No.3 (ICMR) admitted many times that they do not have any such research paper/record to prove, living microorganisms are disease-causing agents. Therefore, Medical Microbiology/Germ theory of disease is hereby disproved.

8.8 That, the Petitioners found that, all alleged research papers along with laboratory methodology, which are being carried out actually are fictional and fraudulent, which doesn't resemble to reality therefore that proves nothing. Provided articles(alleged research papers), by the respondents are briefly mentioned & filed as **Annexure-P-1.**

8.9 The following steps claimed by the medical microbiology to adopt the narrative of PATHOGENESIS OF VIRAL DISEASES but it has not been proven till date:-

(**Excerpt** is taken from the renowned text book i.e. Prescott, Harley, and Kleins Microbiology, 7th Edition/ Joanne M. Willey, Linda M. Sherwood, Christopher J. Woolverton/ chapter 18)

The fundamental process of viral infection is the expression of the viral replicative (see section 18.2) in a host cell. The steps for the infectious process involving viruses usually include the following:

(i) Maintain a reservoir, (ii) Enter a host, (iii) Contact and enter susceptible cells, (iv) Replicate within the cells, (v) Release from host cells (immediate or delayed), (vi) Spread to adjacent cells, (vii) Virus-host interactions engender host immune response

There are cartoon representations supporting to the narrative of virology on the alleged process of infection or life cycle of alleged viruses in the alleged host(eg. human) mentioned in this book, page no. 455 & 431, copies of the depiction filed as **Annexure-P-2**.

8.10 That, but it is very unfortunate that, till date the concerned institutes as well as all over the world have not verified the above mentioned narrative or claim that, it happens in reality. It is very necessary to confirm disease-causing capacity of the particle.

8.11 That, when the respondent no.3 was not giving any reply and response to initial correspondence of investigation to the petitioner associate Pankaj Sen to the response against query dtd 14-02-2022 and reminder letter dtd 14-03-2022, thereafter from 29th Jun 2022 to 15th July 2022 the Open Legal Notice along with all letters correspondence sent

by the petitioner associate Soni Sharma and others time to time to the Respondents on the facts i.e. as per the provided and available published papers, of the existence of alleged sars-related virus is not proving that the alleged virus has ever been identified so far. Hence, imposition of alleged pandemic in the Nation and the prevention, detection and control measures undertaken were/are disproportionate to the available published papers. Copy of the Legal Notice filed as **Annexure-P-3**.

8.12 That, ICMR Respondent no. 3 replies with respect to Open Legal Notice dated 31 Aug 2022 at 5:55PM, the response was unsatisfactory and misleading, ICMR responded with their perspective of blind beliefs ad fictional story on the matter but did not provide any evidence petitioners asked for. Copy of the reply filed as **Annexure-P-4**.

8.13 That, the Petitioners sends Public demand letter pointed out that Virology and Medical microbiology are malpractice/ the practice which is based on misconception and assumptions. And that's why petitioners demanded DG of ICMR & NIV to perform a Practical demonstration immediately to prove their claims (existence of viruses and pathogenic microorganisms). That, the petitioners and associated doctors on 10th March 2023 through e-mail sent i.e. Grievance letter cum Urgent Public Demand for Performance of Duty to the Respondent No.3 and resp. no. 4 Director of National Institute of Virology (NIV), resp. no. 2 in reference to the Open legal notice and previous investigation on replies which convey the fabricated/imaginary methodologies carried out by medical

microbiologists/virologists/microbiologists. The respondents provided unsatisfactory response to the petitioners asked for valid scientific experimental research papers/records/documents to prove the existence of alleged sars-related or disease-causing viruses. In other words, prove that the alleged sars-related and the alleged variants (or disease-causing viruses) are real physical entities that in supported with real time research via public demonstration and peer reviewed Scientific Papers. Additionally, to prove that there was a real scientific basis behind this Pandemic. Copy of the demand letter dated 10-March-2023 and other correspondence are collectively filed as **Annexure-P-5**.

8.14 That, Germ theory of disease states that, to establish that germs (i.e. viruses, bacteria, fungi and other micro-organisms) can cause disease/s, the alleged disease-causing germs should be obtained from a diseased person in the pure/intact form. Hence, in the context of SARS-CoV-2 and other so-called viruses, petitioners and other associated Doctors investigated all the research papers obtained from ICMR, NIV, supplied by the concerned institutes, all RTI replies and other document that claim the existence of SARS-CoV-2; while investigating each and every paper provided by ICMR-NIV or associated institutes, it is found that they have never ever identified the particle as SARS-CoV-2 virus by purification or obtaining it in the intact form of existing entity. Hence the existence of SARS-CoV-2 is not scientifically established.

8.15 That, the petitioners sends the reminder for the

letter with a public demand for practical demonstration earlier by 10-March-2023 i.e. dated 22-March-2023. Copy of the reminder is filed as **Annexure-P-6.**

8.16 That, in this sequence the respondent no.3 in reference to the letter 10-03-2023 sends response for the previous letter caption as Grievance claiming to prove of existence of the SARS-CoV-2 virus through practical real time public demonstration-regarding” dated 07-08-2023 (email received) 04-08-2023(mentioned in the letter), send the reply along with an attachment. That, the respondent neither consider nor comply to the public demand and behaved slangy. Copy of reply filed as **Annexure-P-7.**

8.17 That, the Petitioner's associate doctor Mufassil Dingankar in reference to the earlier letter dated 7th August 2023 again on 12-09-2023 made correspondence with the Respondent no.3 (ICMR & NIV) regarding our previous demand letters for performing the practical demonstration, when the petitioners felt refusing manner from the Respondent no. 3 then, in this letter Dr. Mufassil Dingankar categorically mentioned that, As per our finding the principles & practice of medical microbiology are negligent and mismanaged and that which is going on since decades. We have already systematically demonstrated the drawbacks of all the applied methodology & procedures through our previous correspondence and Legal Notice. The petitioner associated doctor mentioned that, “An unprecedented delay of five months to respond to our demand letter clearly displays your oversight, obliviousness and

inconsiderate behavior towards the citizens, which is not acceptable under any circumstances whatsoever". That, providing a blanket statement that Cell culture is a standard practice and is well known to virologist without supporting solid evidence does not fulfil the criterion of a scientific community or an esteemed institution like ICMR. Furthermore, you failed to clarify how the Cell culture practice is a valid methodology to identify a particle as a virus particle and how it is a valid methodology for establishing a living microorganism as a disease-causing agent. Any scientist or scientific community cannot set or define any rule or methodology as per their own way of proving any science or fact. There are certain set scientific principles to prove any fact that is based on rationality, clarity, verifiability, repeatability, refutability, sanctity of the procedure of proving, universality etc. But it clearly shows that your acts are more about authoritarianism rather than true scientific. Subsequently, the petitioners mentioned that, the students of science, professors, lab practitioners, common people blindly believes on you, therefore, it is your duty, as a public servant, to clarify to the public on any subject matter either with a logical clarification or practical demonstration, when you or your activity is questioned. However, in this case, we both the parties understand that the first part i.e., logical clarification has come to end to end which could not satisfy us at all. That, we are performing our duty as aware citizens and hope & expect the same from you. Therefore, please arrange a practical demonstration with immediate

effect to prove that medical microbiology is not a malpractice and it has any connection with reality. Petitioner associated Doctor Mufassil further stated that, any further delay and any misleading act of deflection from the asked questions in response to this repeated public demand letter will establish that our finding, that medical microbiology is a malpractice, is correct and hence your fear is that a practical demonstration will prove the same from multiple perspective amount to your fraud. Copy of the correspondence filed as **Annexure-P-8.**

8.18 That, it is very important to mention here that the petitioner Jitendra Banjara (M.Sc. Microbiology & Bioinformatics & B.Sc. Biotechnology along with Zoology & Chemistry) sends a letter via email dtd 12-08-2023 to the Director General ICMR (To, icmrhqds@sansad.nic.in & secy-dg@icmr.gov.in) requested to provide research papers mentioned in the letter. Thereafter on 19-08-2023 again sends reminder for the same, he has requested that, kindly help me to understand, how the **Cell Culture Practice is scientifically a valid method for identification of virus particle and to establish an alleged virus particle and living microorganism (i.e. bacteria, fungi, protozoa, nematodes and others) as disease-causing agents**, also please provide Research papers for following-

(i) How the Cell Culture practice is scientifically valid methodology for the identification of an alleged virus particle and to establish it as a disease-causing/ infecting agent?

(ii) How the Culture method practice is a valid method to establish any microorganism as disease-causing agents. Copy of the letter filed as **Annexure-P-9**.

8.19 That, the Respondent no.3 replies via email dtd 04Sept2023 with three attachments. That, in the email-body the respondent no. 3 admitted that, **This information is not available with ICMR.** Copy of email-body filed as **Annexure-P-10**.

8.20 That, after examination of all the attachments, the petitioner found that the attached articles are irrelevant articles which are neither scientific research papers nor the answer the question asked on the research methodology, hereafter petitioner pointed out drawbacks, contradiction of those articles and the misguidance of the community of medical microbiology or ICMR via email.

8.21 That, the petitioner sends grievance letter to respondent no. 3 via email dtd 8Sept2023, caption as Request you to clear your stand on Medical Microbiology practice (the practice of Germ theory of disease) he mentioned in email-body that,

(i) I have received an email reply against my questions on 4Sept2023 via madhumathi.j@icmr.gov.in, ICMR provided three documents which is not satisfactory to my points written in the attachment.

(ii) I'm presenting my findings on provided documents along with other scientific facts and drawbacks which I have observed in the field of medical microbiology.

(iii) Since decades, thousands of crores is being invested every year in virology research practice,

but you are stating that, ICMR does not know about how the applied methodology/ procedure of Virology is a scientifically valid procedure. It is shocking. Then why this virology practice is going on?

(iv) If you do not have evidence to prove microorganisms are harmful, then why the practice of bacteriology, mycology, parasitology, pathology etc. are going on?

(v) It clears that without knowing the validity and scientificity of the methodology in national level, medical microbiologists are practicing it on the basis of blind believe system as it is practiced by other.

That, the petitioner again requested to get evidence of the same matter and said still if you think Medical microbiology is not a malpractice, imaginary and if you think there is any genuineness in it, then provide core evidence. Copy of Email-body along with grievance letter filed as **Annexure-P-11**.

8.22 That the respondent no. 3 sent e-mail to the petitioner dtd 11Sept2023, stated that **The questions you have raised are basic scientific concepts that have been established for several decades with scientific evidence.**

(i) However, we have given scientific articles available for open access for your information.

(ii) ICMR is a Biomedical research organization that promotes biomedical research. **ICMR is not mandated to give explanations on basic scientific concepts that are already established.**

(iii) According to the RTI Act, 2005, only information that is held and available with a public authority can be provided to the information seeker and giving reasons/opinions/ interpretations and providing all **scientific concepts and information available in public domain are beyond the scope of ICMR**. Copy of email-body filed as **Annexure-P-12**.

8.23 That, in this sequence respondent no. 3 sent an email to the petitioner Jitendra Banjara dtd 13-Sept-2023, respondent no.3 expressed his opinion on the queries for how Cell Culture practice is scientifically valid methodology to identify alleged virus particle and to establish microorganism as pathogenic agent. But, in reality he repeated same statement that, Virologist or Medical microbiologist always do, which is entirely based on assumption, misleading-statement, but the statement is not based on science. That, this attempt of correspondence doesn't address the sought information. That, in the email attachment ICMR provided articles, the petitioner scrutinized all papers and they didn't find answer in it. Copy of Email attachment filed as **Annexure-P-13**.

8.24 That, it is very important to mention here that, Petitioner Jitendra Banjara made last correspondence by registered post along with email with respondent no. MoHFW, DHR, NCDC, PMO, Chief Health Secretary Govt of CG. & Commissioner Raipur dtd 3 Sept 2024, to get substantial evidence and demanded for practical demonstration to prove the claim of medical microbiology. But, it has passed about fourteen months the petitioner has not received any single

reply/response till date. That, the petitioner puts subject i.e. **Required evidence for proving Viruses are identified as real entities and living microorganisms are harmful to human and animals. Required evidence for proving SARS-CoV-2 virus identified as a real entity. Required real time demonstration of the experiment that proves the above two points.**

(i) That, the Indian Council of Medical Research (ICMR) and National Institute of Virology (NIV), Pune which is a sub-venture of ICMR, are autonomous bodies acting as guiding entities to the Ministry of Health and Family Welfare, Government of India. Despite multiple attempts the Indian Council of Medical Research and National Institute of Virology could not produce any substantial evidence to support the Germ theory of Disease.

(ii) **That the petitioner, mentioned on the letter, references of last RTIs & letter replies of ICMR and NIV, petitioner stated that, the respondents admitted many times i.e. (i) there is no such scientific research papers available with ICMR, (ii) living microorganisms cause disease is a general scientific concept only and it is found in textbooks, hence it is not part of ICMR domain. (iii) Requested information by the applicant is not available with ICMR. (iv) NIV replied- there is no methodology to isolate virus from human sample. (v) there is no such research paper in public domain to prove the isolation of virus from fresh human sample. (vi) no published peer-reviewed publication, that describes direct purification of SARS-CoV-2**

from patient sample, could be found after extensive literature research. (vii) they have no information about the validity of cell culture practice. Copy of the letter filed as **Annexure-P-14**.

8.25 That, the petitioner associated Pankaj Sen filed RTI dtd 20-05-2022 to ICMR regarding provide research papers i. To prove the Isolation & purification of Bacteria, Fungi, Protozoa, Prion and other microorganisms. ii. The proof that these microorganisms cause human disease. Pankaj Sen also asked the scientific definition of Virus, Infectious disease, epidemic, Pandemic, bioterrorism and Is there any GOLD STANDARD for Isolation and purification of pathogenic virus? When Pankaj Sen was not receiving reply, first appeal was filed dtd 09.07.2022. That, the ICMR misled and send merely the reference of text books instead of providing original research paper/record, dtd 18/07/2022 for the RTI Request Registration no. INCMR/R/E/22/00254.

8.26 That, Pankaj Sen received reply of first appeal dtd 29/07/2022, ICMR admits that **“The information requested regarding bacteria, fungi, virus, protozoa and prions is not available with ICMR”**. That, in this sequence petitioner associated Pankaj Sen filed second appeal dtd 09.08.2022. The CIC decision was issued dtd 24-08-2023, it is confirmed that department of alleged health has no evidence to prove that Microorganisms are pathogenic agents. The respondent admitted before CIC i.e. **“The informations sought by the applicant are general scientific concepts found in textbooks. Though it is not part of ICMR**

domain. And The applicant filed an appeal with different and multiple questions on specific isolation methods through the RTI appeal No. INCMR/A/E/22/00075 dated 09/07/2022. Although this information is not available with ICMR, this was again answered by providing the online links of information available in the public domain". Copy of the decision filed as **Annexure-P-15.**

8.27 That, ICMR-NIV admitted via RTI reply (NIOVP/R/E/22/00025) question raised i.e. Does MoHFW or ICMR or NIV have any documentary evidence or documents of scientific experiments conducted for the conclusion and declaration of COVID19 as an infectious disease. ICMR-NIV replied **"This is not part of our records. Hence, this information cannot be shared"**. Copy of the reply filed as **Annexure-P-16.**

8.28 That, question raised by Jitendra Banjara via RTI to ICMR-NIV on proof of entire germ theory of disease dated 12-03-2024 (vide- INCMR/R/E/24/00139 & NIOVP/R/E/24/00017 respectively); the respondent no.3 replied, **"The applicant has requested for information which is not available with ICMR"**. Respondent no. 4 admitted that, **"This is not part of our records. Hence, this information cannot be shared with you"**. Copy of the sought information and reply filed as **Annexure-P-17.**

8.29 Earlier, the petitioner had filed the petition which was registered as WP(PIL) No.105/2025 which was dismissed as withdrawn due to reinstate various defects in the filed copies and non-deposit of

security amount. Copy of the order dated 02-01-2026 passed in WP(PIL) No. 105/2025 is being filed as **Annexure-P-18**.

8.30 Now the petitioner has submitted the security deposit amount before this Hon'ble Court. Copy of the receipt of the security amount deposited is being filed as **Annexure-P-19**.

9 UNDER THE ABOVE FACTS AND CIRCUMSTANCES THE PETITIONER ARE FILING THIS PUBLIC INTEREST LITIGATION ON THE FOLLOWING GROUNDS:-

- 9.1. Because, the Constitution of India has reiterated to provide opportunity and fair justice to all the people of the country.
- 9.2. Because, the action of respondents is arbitrarily, unreasonable, unfair, unjust in against the principle of natural justice, and illegal and will cause irreparable loss to Public at large.
- 9.3. Because, That the facts stated above and documents filed along with the petition, it is apparent that the respondents have violated to reach the constitutional goal.
- 9.4. Because, the Union of India and other respondents were/are violating all fundamental rights in the name of pandemic or medical microbiology. Discrimination between vaccinated and unvaccinated were everywhere, only vaccinated can approach justice system, only vaccinated allowed to join their duty, freedom of movement was deprived, freedom of speech and expression were deprived, Right to choose the way of treatment was

depriving, any patient with emergency medical condition was bounded to go through first testing protocol and alleged treatment protocols. People were hospitalized & administered by unreasonable under-trial chemicals. Lockdown and restrictions destroyed business, professions or jobs. Students are restricted to enter schools, colleges, institutions and university before go through treatment protocols. Unvaccinated students were restricted to enter schools, colleges, Institutes and universities. Education system was stoped to run and disturbed for a long period of time. Cultural activities were prohibited.

9.5. Because, at present, all the alleged treatment protocols and drugs applied to address all alleged communicable diseases are entirely based on fictional story i.e. Germ Theory of disease, therefore, so far as there is no substantial evidence to prove existence of alleged disease-causing viruses and other microorganisms are disease-causing agents, hence all the treatment protocols stand as wrong treatment protocols and all the claim of Medical microbiology has no meaning. Lots of taxpayers money is being wasted so far on the ground of fictional story.

9.6. Because, the entire living population is miserably affecting from unnecessary panic situation and treatment protocols, wrong drugs of alleged communicable diseases claimed to caused by either alleged virus particles or living/non-living microorganisms. This matter is running about last hundreds of years without verification with scientific manner.

9.7. Because, all the anti-human activities is justifying in the name of alleged prevention and control measures since long. The existence of alleged viruses, alleged, immunization, narrative and claim of unproven medical microbiology is still sustained.

9.8. Because, the petitioners raising various applications, requests and grievances before the respondents, but the same has not been considered and resolved till date.

10. **RELIEFS SOUGHT:-**

In view of the above facts and circumstances, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to grant the following reliefs to the public at large: -

A. A writ and/or an order and/or a direction to the respondents to perform a systematic real time practical demonstration (including wet and dry lab) at immediate action in the petitioner's occupied laboratory/venue to prove that, the claimed particles or microscopic depiction are disease-causing particles called as viruses in real scenario. Therefore to prove the obtainment and identification of the following allegedly claimed particles as disease-causing particles-,

1. Alleged Flu viruses,
2. Alleged SARS-COV-2 virus particle,
3. Alleged HIV,
4. Alleged Measles virus,
5. Alleged Polio virus,
6. Alleged Hepatitis, A,B virus,
7. Alleged Rabies virus,
8. Alleged Small pox,
9. Alleged SARS-related virus,
10. Alleged Japanese encephalitis virus,
11. Alleged Ebola virus,
12. Alleged Nipah virus,
13. Alleged plant virus,
14. Alleged Bacteriophages and
15. Any other alleged disease-causing viruses, including

other alleged host range i.e. plants & animals.

- B. To issue a writ in nature of Mandamus directing to respondent no. 1 to 12, to prove that following microorganisms are disease-causing agents to human and other animals as host- bacteria, fungi, protozoa, prion, nematodes and any other claimed pathogenic microbes.
- C. A writ and/or an order and/or a direction to the Respondents to close (shut down) all institutes, laboratories, Journals, Bioinformatics databases and its tools, workshops; where conducting all kind of practice based on germ theory of disease or alleged medical microbiology i.e. Virology, Bacteriology, Mycology, Phycology, Protozoology, Parasitology, Immunology, drug discovery/drug designing and others.
- D. A writ and/or an order and/or a direction to the Respondents to terminate/withdraw/dismantle all the subjects, courses, study chapters, e-books, hard copies, digital study material, repositories, student's examination papers, laboratory manuals, equipments, reagents and machines, from the universities, colleges, schools and other educational(indoctrination) activities which are based on virology, immunology, medical microbiology/germ theory of disease. On the other words pass decree to terminate alleged virology, immunology and/or medical microbiology or germ theory of disease.
- E. A writ and/or an order and/or a direction to the respondent no. 1 to 4 to immediate provide the experimental scientific evidence as requested in the Open Legal Notice dated 02-07-2022 (for

petitioner to consider a hearing to it) within 48 hours as per Indian Evidence Act, Section 76 in the interest of justice public at large.

- F. To issue a writ in nature of mandamus directing to the respondents to withdraw Public health bill 2017(yet to be act) with immediate effect.
- G. A direction to ban all types/kinds of vaccines, drugs (i.e. Tablets, capsules, intravenous & intramuscular injectable chemicals, oral drugs), immunotherapy or immunological therapy which are related to the germ theory of disease or medical microbiology.
- H. To direct the respondents to provide real evidence that, (a) alleged particles identified as disease-causing viruses which are found in the original sample of claimed hosts as real physical entity, (b) other microorganisms causes disease to the claimed hosts, (c) proof of function of the immune system as per claims/narrative.
- I. Any other relief which this Hon'ble Court deem fit in the facts & circumstances of case may also be granted.
- J. Cost of the petition may also be awarded.

An affidavit in support is filed herewith.

Place: Bilaspur

Jitendra Banjara

Date: /01/2026

PETITIONER-IN-PERSON

CERTIFICATE

It is certified that due care has been taken in this case to comply with provisions of the C.G. High Court Rules.

Place: Bilaspur

Jitendra Banjara

Date: /01/2026

PETITIONER-IN-PERSON

**IN THE HIGH COURT OF JUDICATURE AT
BILASPUR**

WRIT PETITION [PIL] NO. /2026

PETITIONER Jitendra Banjara & Others

Versus

RESPONDENTS Union of India & Others.

I N D E X

S.NO	PARTICULARS	ANNX	PAG E
01.	Synopsis.		
02.	Petition under Article 226 of the Constitution of India with certificate and affidavit		
03.	Copy of the briefly mentioned of the published articles & its links	P-1	
04.	Copy of the depiction of imaginary narrative of alleged life cycle	P-2	
05.	Copy of the Legal notice	P-3	
06.	Copy of the reply by respondent no. 3	P-4	
07.	Copy of the public demand letter dtd 10-March-2023	P-5	
08.	Copy of the reminder by the petitioners	P-6	

09.	Copy of the reply of respondent no. 3	P-7	
10.	Copy of the correspondence made against reply of resp. no. 3	P-8	
11.	Copy of the letter on cell-Culture practice	P-9	
12.	Copy of the e-mail reply of respondent no. 3 on cell-culture dtd 4Sept2023	P-10	
13.	Copy of the email-body & letter attachment by petitioner	P-11	
14.	Copy of the E-mail reply by respondent no. 3 dated 11Sept2023	P-12	
15.	Copy of the email & attachment by respondent no 3	P-13	
16.	Copy of the representation letter sent by petitioner dtd 3Sept-13Sept2024	P-14	
17.	Copy of CIC decision dtd 24-08-2023	P-15	
18.	Copy of the RTI reply on NIOVP/R/E/22/00025	P-16	
19.	Copy of the sought information & reply on entire germ theory of disease	P-17	

20.	Copy of the order dtd 02-01-2026 passed for WP(PIL) No. 105/2025	P-18	
21.	Copy of the receipt of the security amount deposited	P-19	
22.	Additional affidavit as per rule 79 (4) of the High Court of Chhattisgarh Rules, 2007		
23.	Vakalatnama		

Place: Bilaspur

Jitendra Banjara

Date: /01/2026

PETITIONER IN PERSON

IN THE HON'BLE HIGH COURT OF JUDICATURE

AT BILASPUR

WRIT PETITION [PIL] NO. /2026

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SYNOPSIS

By way of this Public Interest Litigation, the petitioner is hereby seeking direction from this Hon'ble Court to direct the concerned respondents to immediately provide substantial evidence and perform real time practical demonstration to prove the claimed particles are real physical entity as disease-causing particles called as virus or viruses; the living microorganisms i.e. bacteria, fungus, protozoa, nematodes & others causes disease/harm; furthermore the reality of immunity and immunization as per the claim & narrative of the medical microbiology. That the petitioners attempts numerous correspondence with the respondents to get real evidence, but the respondents fails to provide and frequently admits they have no evidence/record to prove the existence of alleged disease-causing viruses and other microorganisms cause disease/harm to the alleged claimed hosts (eg. Human, animals & others). The germ theory of disease is the base of implementation of inhuman national health policies, deprivation of fundamental rights, waste of tax payers money, putting in danger to human life in the name of prevention and control measures. Hence, absence of

proof of Germ theory of disease is real, the petitioners seeking to direct to immediate shutdown/withdraw the anti-scientific/fictional practice of medical microbiology.

(B)SUBJECT MATTER IN BRIEF

Present writ petition under Article 226 of the Constitution of India is being filed by way of public interest litigation and the petitioner have no personal interest. The petition is being filed in the larger interest of public, that is, on behalf of all the public of India who were depriving from all the fundamental rights, facing torture, misguided and most importantly facing irreparable injuries in the name of alleged prevention & control measures on alleged viruses, living germs and alleged immunization. The petitioners attempts numerous correspondence requesting to the respondents but, the respondents has neither been provided evidence nor performed real time practical demonstration to prove the existence of disease-causing viruses and the Germ Theory of disease is the real phenomenon happens in the nature. Hence, due to the Germ Theory of Disease the fundamental rights of the are violating & public are miserably affecting since long because of alleged prevention & control measures without having verification of the narrative of germ theory of disease.

(C)(i) The present petition under Article 226 of the constitution of India is being filed by way of Public Interest Litigation and the petitioner has no personal interest. The petition is being filed in the interest of public. That, due to act of the respondent's non-consideration of the requests made by the Petitioner and earlier complaints made by other social workers, independent researchers, independent

journalists in public interest; lockdown destroyed people's life, alleged immunization and treatment protocols made irreversible damage, taxpayer money and public property is being misused, people are suffering from unnecessary fear of microorganisms. People are getting misinformation in the name of medical microbiology. The germ theory of disease is running merely on the basis of assumption about last hundreds of years without verification with scientific manner.

- (ii) That, at present, all the alleged treatment protocols and drugs applied to address all alleged communicable diseases are entirely based on fictional story i.e. Germ Theory of disease, therefore, so far as there is no substantial evidence to prove existence of alleged disease-causing virus and other microorganisms are disease-causing agents, hence all the treatment protocols stand as wrong treatment protocols and all the claim of Medical microbiology has no meaning.
- (iii) That, the petitioner is filing the present petition on his own cost and not at the instance of someone else. The litigation cost including the paper work, traveling expenses of the petitioner, if any, are being borne by the petitioner himself.
- (iv) That, the source of information of the facts pleaded in this Public Interest Litigation is based upon the rules and laws framed by the Law Making Bodies.
- (v) That, the petitioner has sent representation before the respondent no. 2, 5, 6, 8, and 12 with this regard.
- (vi) That, to the best of knowledge of the petitioner, no public interest petition (whether filed by the petitioner himself or by someone else) raising the same issued is filed before this Hon'ble Court or before any other court.

LIST OF DATES AND EVENTS;

DATES	EVENTS
March 2020	Prohibitions/ violation commenced, under the excuse of prevention and control measure, it was depriving all the fundamental rights of the public
2021- 2024	Collection of evidences by the petitioners and correspondence with the respondents
2021	Commencing alleged covid immunization drive
2021- till date	Occurrence of sudden deaths of under-aged people
Till date	Deprivation of fundamental rights is going on without proof of existence of alleged viruses and/or germ theory of disease

Place: Bilaspur

Jitendra Banjara

Date: /01/2026

PETITIONER-IN-PERSON

IN THE HON'BLE HIGH COURT OF JUDICATURE

AT BILASPUR

WRIT PETITION [PIL] NO. /2026

PETITIONER : Jitendra Banjara & Others

Versus

RESPONDENTS : Union of India & Others.

**ADDITIONAL AFFIDAVIT AS PER RULE 79 (4) OF
THE HIGH COURT CHHATTISGARH RULES, 2007**

I, Jitendra Banjara S/o Baran Singh, aged about 32 years, R/o Dewalgarh District Mahasamund, CG. (authorized by team IMIS, a public trust) do hereby solemnly affirm and state on oath as under:-

1. That, I am the petitioner in the captioned matter and as such fully conversant with the facts of case and in a position to swear this affidavit.
2. That, I declare that I have not filed the petition for any personal gain or raising any personal grievance or for a private, ulterior, oblique motive or for extraneous considerations. .

VERIFICATION

I, Jitendra Banjara, above named deponent, do hereby verify that the contents of Para 1 & 2 of this affidavit are true to my personal knowledge and belief. Signed and verified at Bilaspur on this day of January, 2026.

IN THE HON'BLE HIGH COURT OF JUDICATURE

AT BILASPUR

WRIT PETITION [PIL] NO. /2026

PETITIONER : Jitendra Banjara & Others

Versus

RESPONDENTS : Union of India & Others.

AFFIDAVIT

I, Jitendra Banjara S/o Baran Singh, aged about 32 years, R/o Dewalgarh District Mahasamund, CG. (authorized by team IMIS, a public trust) do hereby solemnly affirm and state on oath as under:-

1. That I am petitioner in the instant Public Litigation Petition and as such I am fully conversant with the facts of the case.
2. That, the contents of the instant petition has been drafted under my instructions and explained to me in Hindi.
3. That the contents of Petition are true and correct as per my personal knowledge and belief.

VERIFICATION

I, Jitendra Banjara, above named deponent, do hereby verify that the contents of Para 1 & 2 of this affidavit are true to my personal knowledge and belief. Signed and verified at Bilaspur on this day of January, 2026.