

**IN THE SUPREME COURT OF THE
DEMOCRATIC SOCIALIST REPUBLIC OF SRI LANKA**

*In the matter of an application under and
in terms of the Article 126 read with the
Article 17 of the Constitution.*

SC FR Application No:

Gnanendra Shani Abeysekara,
No. L/1/1, Elvitigala Flats,
Colombo 08.

PETITIONER

-Vs-

1. **Mr. C. D. Wickramarathne,**
Acting Inspector General of Police,
Police Headquarters, Colombo 01.
2. **Mr. Pujith Jayasundara,**
Inspector General of Police, Police
Headquarters, Colombo 01.
3. **Mr. K. W. E. Karalliyadda,**
Chairman,
4. **Mrs. Savithri D. Wijesekere,**
Member,
5. **Mr. Y. L. M. Zawahir,**
Member,
6. **Mr. Tilak Collure,**
Member,
7. **Mr. Gamini Nawarathne,**

Member,

8. **Mr. Ashoka Wijethilaka,**
Member,

9. **Mr. G. Jeyakumar,**
Member,

10. **The Secretary,**

The 3rd to 10th Respondents all of:

National Police Commission,
(BMICH) Premises, Block 09,
Colombo 07.

11. **Mr. Mahinda Deshapriya,**
Chairman,

12. **Mr. N. J. Abeysekara PC,** Member,

13. **Prof. S. Ratnajeevan H. Hoole,**
Member,

14. **Commissioner General of Elections,**

The 11th to 14th Respondents all of:

Election Commission, Election
Secretariat, Sarana Mawatha,
Rajagiriya

15. **Mr. W. Thilakarathna, Director,**
Criminal Investigation Department,
Colombo 01.

16. **The Secretary, Ministry of Defence,**
No. 15/5, Baladaksha Mawatha,
Colombo 03.

17. The Honourable Attorney General,
Department of the Attorney General,
Colombo 12.

RESPONDENTS

On this the 20th day of December 2019.

**TO HIS LORDSHIP THE CHIEF JUSTICE AND THE OTHER
HONOURABLE JUDGES OF THE SUPREME COURT OF THE
DEMOCRATIC SOCIALIST REPUBLIC OF SRI LANKA**

The Petition of the Petitioner above named appearing by his Attorney-at-Law Mr. Manjula Balasooriya states as follows:-

The Petitioner

1. The Petitioner is a citizen of Sri Lanka and a Senior Superintendent of Police attached to the Sri Lanka Police who was serving as the Director of the Criminal Investigation Department (CID) at the time of the impugned transfer, which the Petitioner is seeking to challenge in this Application. The Petitioner is 58 years of age, is married and is a father of two children.

The Respondents

2. The Petitioner states that:
 - i) The 1st Respondent is the Acting Inspector General of Police who has most unfairly, arbitrarily, capriciously, unreasonably, unlawfully, and illegally, transferred the Petitioner purportedly with the approval of the National Police Commission and the concurrence of the Election Commission of Sri Lanka, as morefully setout below;
 - ii) The 2nd Respondent is the present holder of the office of the Inspector General of Police. However at the times material to this application, he was on compulsory leave;
 - iii) The 3rd Respondent is the Chairman and 4th to 9th Respondents are the Members and the 10th Respondent is the Secretary of the National Police

Commission. The Petitioner states that the National Police Commission has purportedly approved the impugned transfer of the Petitioner;

- iv) The 11th Respondent is the Chairman and 12th and 13th Respondents are the Members of the Election Commission of Sri Lanka. The 14th Respondent is the Commissioner General of Elections. The Petitioner states that impugned transfer order has been issued purportedly with the concurrence of the Election Commission of Sri Lanka.
- v) The 15th Respondent is the present holder of the office of Director of the Criminal Investigation Department. The Petitioner states that the order impugned in this application is the same order by which the 15th Respondent was appointed to the office of Director of the Criminal Investigation Department;
- vi) The 16th Respondent is the Secretary to the Ministry of Defence; and
- vii) The 17th Respondent is the Honourable Attorney General who has been made a party to this application as required by law.

Details of the Petitioner's career

3. The Petitioner joined the Sri Lanka Police on 10th February 1986 as a Sub Inspector of Police and had his basic training at the Sri Lanka Police College – Kalutara. The Petitioner successfully completed his basic training and graduated from the said College on 30th May 1986.

*A true copy of the page 22 of the service record of the Petitioner is marked as **P-1** and is annexed and pleaded as part and parcel of the Petition.*

4. Thereafter, the Petitioner served as a Sub Inspector of Police at the Cinnamon Gardens Police Station from 30th May 1986 to 1st July 1986. The Petitioner was absorbed into the Special Task Force of the Sri Lanka Police on 1st of July 1986 and underwent Para Military Training at the Katukurunda Training Wing until 5th December 1986.
5. During his service in the Special Task Force, he had served in many parts of the Island including operational areas. The Petitioner was posted to the Special Task Force camp at Kiran in the Batticaloa District in the Eastern Province of Sri Lanka on 9th December 1986 and served there until 29th July 1987. Thereafter, he was

posted to Morakottanchena Special Task Force Camp on 29th July 1987 and served there until 10th May 1988.

6. On 10th May 1988, he was called back to serve at the Special Task Force Camp at Kiran and served there until 17th December 1989.
7. He was stationed at Yalabowa Special Task Force Camp at Wellawaya in Uva Province from 17th December 1989 to 9th July 1990. Thereafter the Petitioner was posted to Sangamankanda Special Task Force Camp in the Ampara District until 17th December 1990. On 17th December 1990 the Petitioner was posted to the Special Task Force Camp at Sastrawela Jungle Training Camp in the Eastern Province of Sri Lanka as an Officer-in-Command.
8. On 1st January 1991, the Petitioner was promoted to the rank of Inspector of Police and was transferred to the VIP Security Division of the Police Special Task Force with effect from 27th January 1992. Later, the Petitioner underwent a training on Close Protection of VIPs from 3rd February 1992 to 3rd March 1992 at the Katukurunda Special Task Force Training Wing.
9. Thereupon, the Petitioner was assigned to provide close protection to His Excellency the President and Cabinet Ministers. From 11th April 1992 to 6th October 1994, the Petitioner performed his duties as a close protector of designated VVIPs, as a member of the Close Protection Team of the Special Task Force. On 6th October 1994, the Petitioner was posted to the Special Task Force Camp at Porathiv in the Eastern Province of Sri Lanka where he served as the Officer in Command till 20th January 1995.
10. From 20th January 1995 onwards, the Petitioner was absorbed to the general duties of the Sri Lanka Police and served as the Deputy Officer-in-Charge of Crimes at Narahenpita Police Station from 20th January 1995 to 01st January 1996. Subsequently, the Petitioner was transferred to the Grandpass Police Station as Officer-in-Charge of the Crime Branch on 01st January 1996.
11. The Petitioner performed duties as Officer-in-Charge of Range Criminal Investigation Office at Maradana Colombo Unit from 27th September 1998 to 10th January 1999.
12. The Petitioner was promoted to the rank of Chief Inspector of Police with effect from 1st January 2003 and the same was antedated to 8th September 1998

subsequently. This was considered as a special promotion on Merit by the Sri Lanka Police.

True copies of the letters pertaining to the decision of the National Police Commission to antedate the promotion of the Petitioner to the rank of Chief Inspector of Police are marked as P-2A to P-2C and are annexed and pleaded as part and parcel of the Petition.

The Petitioner respectfully prays to reserve his right to submit further details/documentation regarding the same if deemed necessary by Your Lordships' Court.

13. The Petitioner states that on a special request made by the then Deputy Inspector General of Police of the Criminal Investigation Department to the Inspector General of Police, the Petitioner was assigned to the Criminal Investigation Department on 10th January 1999. From 23rd August 2004 to 27th September 2007, the Petitioner served as the Officer-in-Charge of the Criminal Investigation Department.

14. The Petitioner was promoted to the rank of Assistant Superintendent of Police on 27th September 2007, which was considered as a field promotion of the Sri Lanka Police and was posted as the Assistant Superintendent of Police in charge of Jaffna (District I) in the Northern Province of Sri Lanka on 27th September 2007. On 1st January 2008 the Petitioner's field promotion was confirmed and he was gazetted as an Assistant Superintendent of Police.

A true copy of a letter sent by the National Police Commission informing the Petitioner that he has been promoted to the rank of Assistant Superintendent of Police with effect from 01/01/2008 is marked as P-3 and is annexed and pleaded as part and parcel of the Petition.

15. The Petitioner states that on 1st April 2009, he was reposted to the Criminal Investigation Department, where he served till 20th April 2010. Subsequently, the Petitioner was transferred as the District-in-Charge Officer of Homagama South. Thereafter, on 14th July 2010, the Petitioner was transferred back to the Criminal Investigation Department.

16. The Petitioner states that he was given a special promotion by the National Police Commission based on the special recommendation made by the then Inspector General of Police Mr. N. K. Illangakoon to the rank of Superintendent of Police on 25th August 2011. The said special promotion was given to the Petitioner by the National Police Commission based on a commendation made by Hon. Justice

Shiranee Tilakawardane for the Petitioner's exceptional work in the Angulana Murder Investigation.

A true copy of the commendation by Hon. Justice Shiranee Tilakawardane is marked as P-4 and is annexed and pleaded as part and parcel of the Petition.

17. The Petitioner was promoted to the rank of Senior Superintendent of Police by the National Police Commission on 25th August 2016 based on the unblemished record maintained by the Petitioner during 05 years of previous service in the rank of Superintendent of Police.

A true copy of a telephone message sent by the 1st Respondent on 30/10/2019 bearing RTM No. 1155, CRTM No. 1938 and his No. D/HRM/Promotion/299/2019 which indicates the effective date of promotion of the Petitioner to the ranks of Superintendent of Police and Senior Superintendent of Police is marked as P-5 and is annexed and pleaded as part and parcel of the Petition.

18. The Petitioner states that as a senior officer of the Criminal Investigation Department, he supervised the Special Investigation Unit (II), Special Branch, Gang Robbery Branch and Homicide Investigation Unit of the Criminal Investigation Department.

19. The Petitioner states that on 9th September 2017, he was appointed as the Director of the Criminal Investigation Department - Sri Lanka's premier law enforcement body and the functional division of the police charged with international law enforcement cooperation, investigation of high profile and complex crimes, large scale financial crimes and human smuggling.

A true copy of a letter sent by the Senior Deputy Inspector General of Police of the Criminal Investigation Department, Mr. D. W. R. B. Seneviratne to the 2nd Respondent dated 25/08/2017 recommending the Petitioner to the position of Director of the Criminal Investigation Department is marked as P-6 and is annexed and pleaded as part and parcel of the Petition.

A true copy of the telephone message sent by the 2nd Respondent bearing TM No. 61 and his No. D/MD/ADM/1644/2017 appointing the Petitioner to the position of Director of the Criminal Investigation Department is marked as P-7 and is annexed and pleaded as part and parcel of the Petition.

Petitioner is an outstanding police officer

20. The Petitioner states that he has an unblemished record of service for over 33 years and was never suspended or served with a charge sheet, to date. Although he has been named as a Respondent in several fundamental rights applications, the same is not on his personal capacity but as the Director of the Criminal Investigation Department.

21. During his period of service, he received numerous commendations, awards and special salary increments. In addition, the Petitioner also underwent rigorous training which enabled him to function as an exemplary officer.

*The details of aforesaid commendations, awards and special salary increments and the training that the Petitioner underwent are set out in a schedule attached hereto marked **P-8** (together with corresponding supporting documents attached with respective sub markings), pleaded as part and parcel hereof.*

22. Further, during active service the Petitioner was involved in the investigation of a number of high-profile matters, including:

- i) The attempted murder of (former) President Chandrika Bandaranayaka Kumaranathunga in 1999;
- ii) Katunayake International Airport attack by the LTTE in 2001;
- iii) Murder of Yvone Johnson at Royal Park Condominium in 2005;
- iv) The attempted murder of (former) Secretary of Defense and incumbent President, Mr. Gotabhaya Rajapaksha in 2006;
- v) The kidnapping and disappearance of 11 youth by the Naval Intelligence personnel in 2008;
- vi) The 'Angulana double murder' case in 2009;
- vii) The kidnapping and disappearance of Prageeth Ekmaligoda in 2010;

*A list prepared by the Petitioner depicting special investigations conducted by him is marked as **P-9** and is annexed and pleaded as part and parcel of the Petition.*

Purported transfer of the Petitioner

23. From and after his appointment on the 9th September 2017, the Petitioner proceeded to function and perform his duties as the Director of the Criminal Investigation Department.
24. The Presidential Election 2019 was held on 16th November 2019 and the final result of the same was announced on the next day, namely, the 17th November 2019.
25. Just four days after the release of the results the aforesaid Presidential Election, namely on the 21st November 2019, the 1st Respondent, by a telephone message bearing RTM No. 678, C/RTM No. 1304 and his No. D/HRM/ADM/2011/2019 informed the Petitioner that he has been transferred with immediate effect as the Personal Assistant to the Deputy Inspector General of Police, Galle Range. The relevant portions of that said telephone message read as follows:

ජාතික පොලිස් කොමිෂන් සභාවේ 2019.11.21 දිනැති අංක NPC/ED/GO/TR/05/01/19-III දරණ ලිපියේ සඳහන් අනුමැතිය පරිදි හා මැතිවරණ කොමිෂන් සභාවේ 2019.11.20 දිනැති අංක EC/SO/PE/EDR/1/4 දරණ ලිපියේ සඳහන් එකඟතාවය අනුව පහත ස්ථාන මාරු කිරීම් වහාම ක්‍රියාත්මක වන පරිදි මෙයින් නියෝග කරමි.

01. ජ්‍ය.පො.අ. ජී. එස්. අබේසේකර මහතා - අපරාධ පරීක්ෂණ දෙපාර්තමේන්තුවේ අධ්‍යක්ෂ තනතුරේ සිට ගාල්ල කොට්ඨාශය වෙත (නි.පො.ප. ගාල්ල දිසාවගේ පුද්ගලික සහකාර ලෙස)

*A true copy of aforesaid telephone message bearing RTM No. 678, C/RTM No. 1304 and his No. D/HRM/ADM/2011/2019 is marked as **P-10** and is annexed and pleaded as part and parcel of the Petition.*

26. By the very same telephone message P-10, the 15th Respondent was appointed as the Director of the Criminal Investigation Department. The 15th Respondent was the Director of the Environmental Protection Division, prior to such appointment.
27. Although the aforesaid message states that the approval of the National Police Commission and the concurrence of the Election Commission have been obtained respectively by letter dated 21/11/2019 bearing No. NPC/ED/GO/TR/05/01/19-III and letter dated 20/11/2019 bearing No.

EC/SO/PE/EDR/1/4, the Petitioner is not in possession of the aforesaid documents.

28. The Petitioner states that the aforesaid transfer of the Petitioner was not a routine transfer. The Petitioner further states that he did not receive any prior notice of such transfer and no reason was either given or stated for such transfer.
29. Therefore, up to date, the Petitioner is unaware of the reason for his transfer and in the circumstances, such transfer of the Petitioner remains a transfer without reason.
30. In any event, after handing over his files and documents to the relevant officers at the Criminal Investigations Department, he reported for duties as the Personal Assistant of the Deputy Inspector General of Police of Galle Range, the on 25th November 2019.

A telephone message pertaining to reporting of duties by the Petitioner is marked as P-13 and is annexed and pleaded as part and parcel of the Petition.

31. The Petitioner states that due to threats to his life arising due to the very sensitive and complex investigations carried out by the Petitioner, in or around 2008 the predecessor of the 2nd Respondent Mr. N. K. Illangakoon allocated an additional vehicle bearing No. KX 5303 to the Petitioner for the use of his personal security. Further, the Petitioner was provided with security when travelling to and from his home and his house was protected at night by the officers of the Special Task Force. All these security measures were removed on the same day that the Petitioner was purportedly transferred.
32. The Petitioner states that on 22nd November 2019, he sought permission of the Senior Deputy Inspector General of Police of the Criminal Investigation Department to take the aforesaid vehicle bearing No. KX 5303 to the Galle range. The said SDIG of the CID recommended the Petitioner's request and forwarded the same to the 1st Respondent. Up to date, the Petitioner did not receive any response to his request and the Petitioner still fears for the safety of his life.

A true copy of aforesaid letter dated 22/11/2019 which also contains the recommendation of the SDIG of the CID is marked as P-11 and is annexed and pleaded as part and parcel of the Petition.

33. The Petitioner states that:

- i) Out of 101 Senior Superintendents of Police, he is ranked 13th in the seniority list of the Senior Superintendents of Police;
- ii) The Petitioner is the only Senior Superintendent of Police who is assigned to serve as a Personal Assistant to a Deputy Inspector General of Police;
- iii) There is no specific list of duties to be carried out by a Personal Assistant to a Deputy Inspector General of Police and the work currently required to be carried by the Petitioner are opening of letters received by the Deputy Inspector General of Police and entering them in a register, relaying messages and orders to and from the Deputy Inspector General of Police to the relevant officers and divisions and answering telephone calls received by the Deputy Inspector General of Police when he is not in office;
- iv) Therefore, the Petitioner's transfer from the position of Director of the Criminal Investigation Department to the post of Personal Assistant to the Deputy Inspector General of Police Galle Range amounts to a degradation of service.

A true copy of Seniority List of Senior Superintendents of Police as at 17/12/2019 (without STF) is marked as P-12 and is annexed and pleaded as part and parcel of the Petition.

34. The Petitioner states that several high-profile investigations were conducted by the Criminal Investigation Department at the time the Petitioner was the Director. Many such investigations are still continuing. Therefore, the transfer of the Petitioner from the Criminal Investigation Department necessary resulted in the removal of the Petitioner from the supervision, direction and control of such investigations.

35. Some of the aforesaid investigations also pertains to complaints relating to high profile persons including several persons from security forces and politicians. The Petitioner verily believes that the aforesaid transfer of the Petitioner for which no reason has been assigned, has been motivated for reasons other than service-related requirements and/or exigencies of service. The Petitioner verily believes that he was transferred from the position of Director of the Criminal Investigation Department due to external influences and/or collateral reasons to jeopardize the sensitive, complex and high-profile investigations supervised by

the Petitioner in his capacity as the Director of the Criminal Investigations Department.

36. In the circumstance, the Petitioner states that by the aforesaid transfer, he has been penalized without any lawful or justifiable cause, reason or justification.
37. The Petitioner states that he had a reasonable and legitimate expectation of continuing in such position as the Director of the Criminal Investigation Department, unless it became necessary for the Petitioner to be transferred out of such position due to exigencies of service or for disciplinary reasons and the aforesaid transfer of the Petitioner is a transfer without reason.
38. On or around on 26th November 2019, the Petitioner became aware through media reports that 704 officers attached to the Criminal Investigation Department had been barred from overseas travel. The Petitioner further became aware that although he has been transferred out of the Criminal Investigation Department on the 21st November 2019, the Petitioner's name has also been included in the aforesaid list of persons.

*True copies of the newspaper articles pertaining to above are marked as **P-14** and is annexed and pleaded as part and parcel of the Petition.*

39. The Petitioner states that on 03rd December 2019, the Deputy Inspector General of Police Galle range was informed by the Director of the Special Investigation Unit to refer the Petitioner to the said Unit on 06th December 2019 at 9.00 am to record a statement from the Petitioner relating to two "urgent inquiries" conducted by the said Unit on the orders of the Inspector General of Police.

*A true copy of the telephone message pertaining to above is marked as **P-15** and is annexed and pleaded as part and parcel of the Petition.*

40. Accordingly, on the 06th December 2019, the Petitioner reported to and made a statement to the Special Investigation Unit. The Petitioner states that the said unit questioned him relating to the overseas travel of IP Nishantha Silva, who functions as OIC of the Gang Robberies Branch at the Criminal Investigation Department and relating to a complaint made by the retired Deputy Inspector General of Police Mr. Palitha Siriwardena, relating to several matter including the investigations relating to damaging of several Buddha statues in the Mawanella area.

41. The Petitioner states that in the aforesaid circumstances, on 08th December 2019 he preferred an appeal to the Inspector General of Police against his transfer. Up to date, the Petitioner has not received any response thereto.

A true copy of the aforesaid appeal is marked as P-16 and is annexed and pleaded as part and parcel of the Petition.

42. The Petitioner states that the aforesaid transfer hinders the career prospects of the Petitioner. Further, the aforesaid transfer effected as set out above, has subjected the Petitioner to public ridicule and embarrassment among the fellow officers in the Police service.

Infringement of the Petitioner's Fundamental Rights

43. In the foregoing circumstances the Petitioner states that his transfer from the position of Director of the Criminal Investigation Department constitutes administrative and/or executive action within the meaning of the Constitution, which;

- i. Is without any justifiable reason, arbitrary, unreasonable, unfair, unjust, capricious and irrational;
- ii. Is based on irrelevant considerations and has been carried out for collateral purposes, motivated by extraneous considerations;
- iii. Is without any legal basis whatsoever;
- iv. Is against the legitimate expectations of the Petitioner;
- v. Is tainted with *mala fides*;
- vi. Is *ultra vires*;
- vii. Is illegal and contrary to law;
- viii. has been carried out contrary to the principles of natural justice; and
- ix. Is discriminatory of the Petitioner.

44. The Petitioner further states that in the circumstances the aforesaid transfer of the Petitioner violates the Fundamental Rights guaranteed to the Petitioner:

- a) under Article 11 of the Constitution guaranteeing to him that he shall not be subjected to degrading treatment or punishment;
- b) under Article 12(1) of the Constitution guaranteeing to him equality before the law and equal protection of the law;

- c) under Article 12(2) of the Constitution guaranteeing to him the freedom not to be discriminated on the grounds of race, religion, language, caste, sex, political opinion, place of birth or any one of such grounds;
- d) under Article 14(1)(g) of the Constitution guaranteeing to him the freedom to engage in any lawful occupation, profession, trade, business or enterprise.

45. The Petitioner states that:

- i) The Petitioner has investigated several high-profile cases during his career, including while he was the Director of the Criminal Investigations Department;
- ii) As such, the life of the Petitioner has consistently been under threat;
- iii) It is for this reason that the Petitioner was provided with security even while he was an Assistant Superintendent of Police;
- iv) It was for this very reason that the Senior Deputy Inspector General of Police of the Criminal Investigation Department made the recommendation set out in P-11 aforesaid;
- v) The non-provision of such security at present unnecessarily increases the exposure of the Petitioner to such threats and dangers;
- vi) Therefore, grave and irreparable loss and damage would be caused to the Petitioner, unless the interim relief sought herein is granted to the Petitioner.

46. The Petitioner respectfully reserves his right to add parties to this application and tender further material.

47. The Petitioner has not previously invoked the jurisdiction of Your Lordships' Court in this matter.

WHEREFORE THE PETITIONER RESPECTFULLY PRAYS THAT YOUR LORDSHIPS' COURT BE PLEASED TO:

- a) Grant the Petitioner, Leave to Proceed with this application in the first instance;
- b) Grant and issue an Interim Order directing the 1st Respondent to restore the security arrangements for the Petitioner to the level provided to him prior to the 21st of November 2019, until the hearing and final determination of this application;
- c) Direct the 3rd to 10th Respondents to submit Your Lordships' Court the approval of the National Police Commission to transfer the Petitioner, said to be contained in its letter dated 21/11/2019 and bearing No. NPC/ED/GO/TR/05/01/19-III, and the letters of the 1st Respondent (or any persons acting on his behalf) requesting such approval of the National Police Commission to transfer the Petitioner;
- d) Direct the 11th to 14th Respondents to submit Your Lordships' Court the concurrence of the Election Commission of Sri Lanka to transfer the Petitioner, said to be contained in its letter dated 20/11/2019 bearing No. EC/SO/PE/EDR/1/4, and the letters of the 1st Respondent (or any persons acting on his behalf) requesting such concurrence of the Election Commission of Sri Lanka to transfer the Petitioner;
- e) Grant and issue a Declaration that Fundamental Rights guaranteed to the Petitioner under Articles 11, 12(1), 12(2) and 14(1)(g) of the Constitution have been infringed;
- f) Make Order quashing the approval of the National Police Commission to transfer the Petitioner from the position of Director of the Criminal Investigation Department of Sri Lanka Police, which is said to be contained in its letter dated 21/11/2019 and bearing No. NPC/ED/GO/TR/05/01/19-III;
- g) Make Order quashing the concurrence of the Election Commission of Sri Lanka to transfer the Petitioner from the position of Director of the Criminal Investigation Department of Sri Lanka Police which is said to be contained in its letter dated 20/11/2019 bearing No. EC/SO/PE/EDR/1/4;

- h) Make Order quashing the transfer of the Petitioner from the position of Director of the Criminal Investigation Department of Sri Lanka Police as reflected in P-10;
- i) Make Order quashing the transfer of the 15th Respondent to the position of Director of the Criminal Investigation Department of Sri Lanka Police as reflected in P-10;
- j) Make Order directing that the Petitioner be restored to the position of Director of the Criminal Investigation Department of Sri Lanka Police;
- k) Direct the 1st Respondent to restore the security arrangements for the Petitioner to the level provided to him prior to the 21st of November 2019;
- l) Award the Petitioner a compensation in a sum of Rs. Ten Million or such other sum as may be deemed appropriate by Your Lordships' Court;
- m) Grant costs; and
- n) Grant such other and further relief that Your Lordships' Court shall deem meet in terms of Article 126(4) of the Constitution of the Democratic Socialist Republic of Sri Lanka;

Attorney-at-Law for the Petitioner