



PUNJAB ELECTION WATCH

561-L, Model Town, Ludhiana 141002 (Pb.)

Contact: 98157 81629, 98143 13162

10 June 2025

To
The Election Commission of India
Nirvachan Sadan, Ashoka Road,
New Delhi – 110001

The Chief Electoral Officer, Punjab
Chandigarh

Copy to:

The District Election Officer, Ludhiana
All Major Media Outlets

Subject: Urgent Action Required to Halt Egregious Model Code of Conduct Violations, Enforce ₹40 Lakh Expenditure Limit, and Promote cVIGIL in Ludhiana West Bye-Election

Respected Sir/Madam,

We, the Association for Democratic Reforms (ADR) and Punjab Election Watch, organizations dedicated to safeguarding electoral integrity, urgently write to report multiple egregious violations of the Model Code of Conduct (MCC) and election expenditure regulations in the ongoing Ludhiana West bye-election, with only 9 days remaining until polling on June 19.

The District Election Officer's (DEO) failure to act **suo moto** on blatant MCC violations, as mandated by ECI guidelines, threatens to undermine the fairness of this election and voter trust. We are sharing this letter with the media to ensure public scrutiny and amplify calls for accountability.

Observed Violations Threatening Voter Rights:

1. Pervasive Illegal Hoardings and DEO's Dereliction of Duty:

The ruling party candidate has littered Ludhiana's cityscape with widespread, unauthorized hoardings, extending far beyond constituency limits, in brazen violation of MCC Part I, General Conduct. These highly visible displays, prominently erected in areas such as Sarabha Nagar, Link Road, Chandigarh Road, Ferozepur Road, Dugri Road, and Gill Road, constitute a flagrant affront to electoral fairness and likely exceed the ₹40 lakh expenditure limit per candidate, as prescribed by the ECI.

The DEO's egregious failure to act suo moto, as required by ECI guidelines, constitutes a deliberate abdication of responsibility, granting an unjust advantage to the ruling party and undermining public confidence in the democratic process. With only 9 days until polling, there is no time for repeated complaints. We urgently demand the immediate removal of these hoardings, inclusion of their costs in candidates' expenditure accounts, and the prompt replacement of the DEO with an impartial officer to restore neutrality and rigorously enforce the MCC, as the ECI has done in past instances of official negligence.

2. Failure in Expenditure Monitoring Against ₹40 Lakh Limit:

Expenditure observers and election officials are clearly failing to enforce the ECI's ₹40 lakh expenditure limit per candidate, allowing unchecked spending by shadow teams and proxy campaigners benefiting certain candidates. This lapse violates ECI's expenditure monitoring guidelines and Section 77 of the Representation of the People Act, 1951, risking candidate disqualification for exceeding the cap.

We demand rigorous oversight, accurate shadow registers, and audits to ensure all campaign expenses, including those by proxy teams, are tracked and kept within the ₹40 lakh limit.

3. Unapproved and Oversized Campaign Materials:

Candidates are flooding the constituency with unapproved advertisements, posters, and oversized banners, flouting the Media Certification and Monitoring Committee (MCMC) requirements. These materials, exceeding ECI-approved dimensions, contribute to excessive spending beyond the ₹40 lakh cap. They must be removed immediately, with their costs added to candidates' expenditure accounts.

4. Environmental Harm from Campaign Materials:

The rampant use of plastic flex boards and non-biodegradable materials not only violates ECI advisories but also inflicts lasting environmental damage on Ludhiana, a city already grappling with pollution concerns. These materials likely inflate candidate expenditures beyond the ₹40 lakh limit. We urge their immediate removal, inclusion in expenditure accounts, and enforcement of eco-friendly campaign guidelines to align with public demand for sustainability.

5. Misuse of Government Resources:

Government vehicles, security personnel, and Punjab government ministers have been observed brazenly participating in campaign activities, breaching MCC Part VII (Prohibition of Public Resources). This misuse of public assets for partisan gain demands immediate scrutiny of vehicle logbooks and strict action to prevent further violations.

6. Erosion of Transparency and Need for cVIGIL Promotion:

The absence of public disclosure of shadow expenditure registers, notices issued, or enforcement actions shields violators from accountability and obscures whether candidates are adhering to the ₹40 lakh expenditure limit.

To empower citizens to report MCC violations and excessive spending in real time, we urge the ECI to vigorously promote its cVIGIL app among Ludhiana West voters through public campaigns, media outreach, and local election offices. This will enable expenditure observers to swiftly identify and punish candidates exceeding the ₹40 lakh limit, as per Section 10A of RPA, 1951.

We further demand real-time public access to expenditure records, notices, and enforcement actions to enable citizen and media scrutiny of compliance with the ₹40 lakh cap.

7. Candidate Accountability and Evidence Submission:

Candidates who fail to disclose expenditures or misrepresent them can face disqualification under Sections 77, 78, and 10A of the Representation of the People Act, 1951. Citizens should be encouraged to submit evidence of violations, and expenditure observers along with election officials must actively collect and maintain records to compare actual spending with declared accounts.

Urgent Actions Requested to Safeguard Democracy:

To halt this assault on voter rights and restore public trust in the Ludhiana West bye-election, we implore the ECI to:

- Immediately remove all unapproved, oversized, and environmentally harmful campaign materials, adding their costs to candidates' expenditure accounts to ensure compliance with the ₹40 lakh limit.
- Enforce vigilant, impartial monitoring by expenditure observers and election officials, with accurate shadow registers and audits to track all expenses against the ₹40 lakh cap per candidate.
- Investigate and halt the misuse of government vehicles and resources for campaigning.
- Replace the current DEO due to their egregious failure to act suo moto on blatant MCC violations, as seen in the unchecked proliferation of illegal hoardings, to restore impartial administration.

- Launch an urgent campaign to vigorously promote the cVIGIL app among Ludhiana West voters to enable real-time reporting of MCC violations and excessive spending, ensuring violators are caught and punished under Section 10A of RPA, 1951.
- Mandate real-time public disclosure of expenditure records, notices, and enforcement actions to enable citizen and media scrutiny of compliance with the ₹40 lakh limit.
- Strictly enforce the MCC and election laws, with swift, exemplary action against violators, including disqualification for exceeding expenditure limits.
- Hold the DEO accountable for dereliction of duty under ECI guidelines and Rules 3 and 4 of the Candidate Handbook 2023 regarding inspection of accounts and timely communication to candidates.
- Immediately initiate a comprehensive enquiry into the accuracy of the day-to-day expenditure accounts submitted by the candidates as required by law.
- Issue show-cause notices to candidates found exceeding expenditure limits, and take strict legal action as warranted.
- Forward findings of illegal expenditure to the Income Tax Department for further investigation as appropriate.
- If the election expenditure submission deadline lapses, initiate disqualification proceedings under Section 10A of the Representation of the People Act, 1951.

We have documented evidence (including GPS-tagged photographs with time and date stamps) to substantiate these claims. These are samples only and no way represent all the advertisements. You are requested to do a thorough check and catch all the hoardings and ensure their expenditure is strictly accounted for. The media's role in exposing these violations is critical, and we call on journalists to amplify this issue and promote the cVIGIL app to protect the democratic rights of Ludhiana's voters to send complaints for a fair election as per law.

With only 9 days left until polling on June 19, decisive and transparent action by the ECI—particularly immediate replacement of the DEO and rigorous enforcement of the ₹40 lakh expenditure limit—is essential to uphold electoral integrity and public confidence.

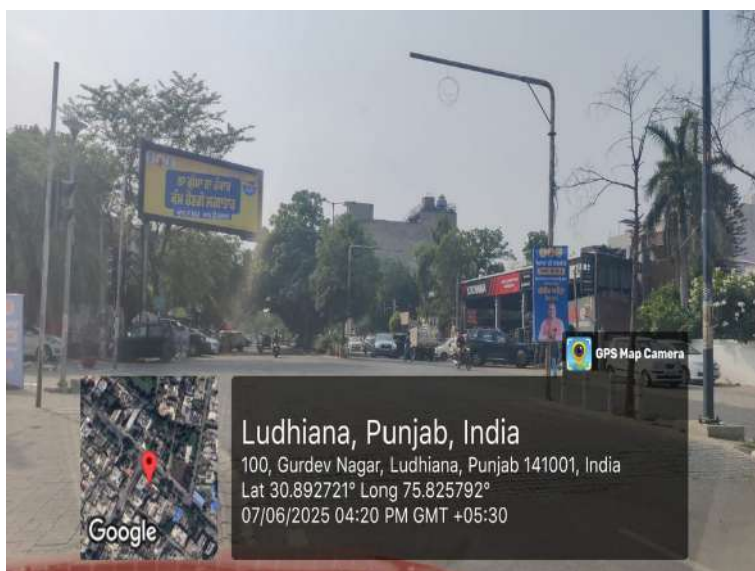
Sincerely,

Jaskirat Singh
 Trustee, Association for Democratic Reforms
 Phone: 98157-81629

Parvinder Singh Kittna
 Coordinator, Punjab Election Watch
 Phone: 98143-13162

Enclosures:

GPS and date/time stamped photographs of campaign hoardings (samples only) found in Ludhiana West constituency.





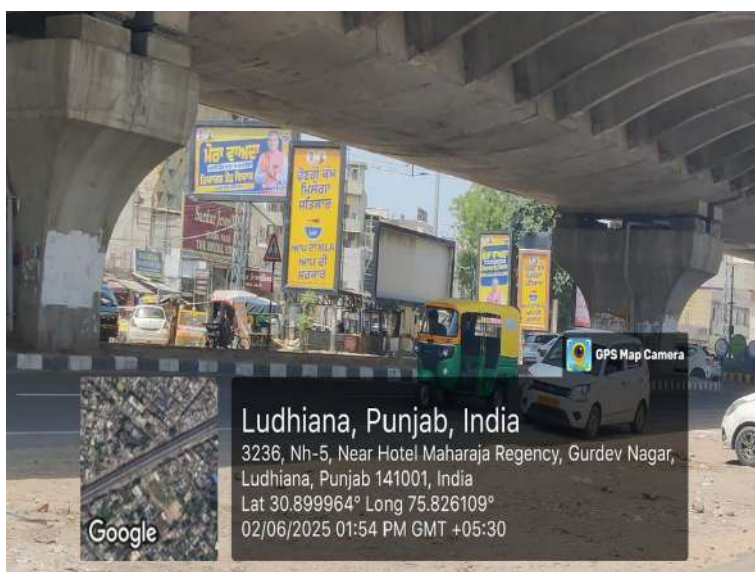




























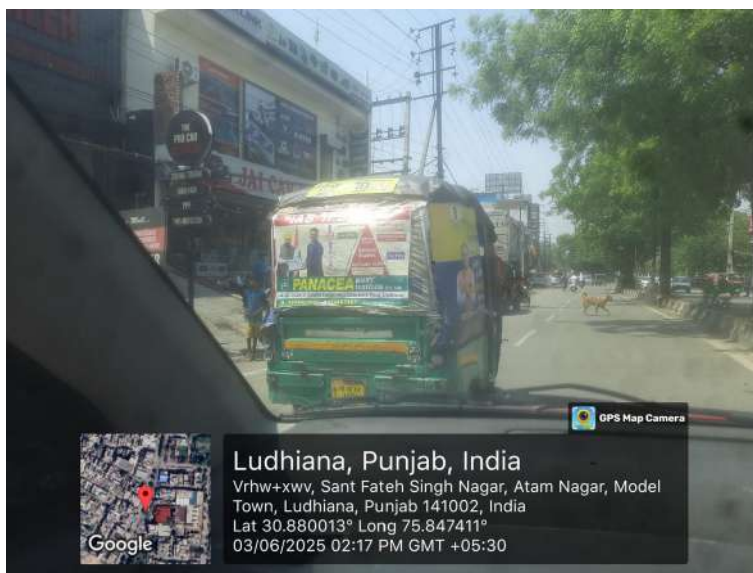


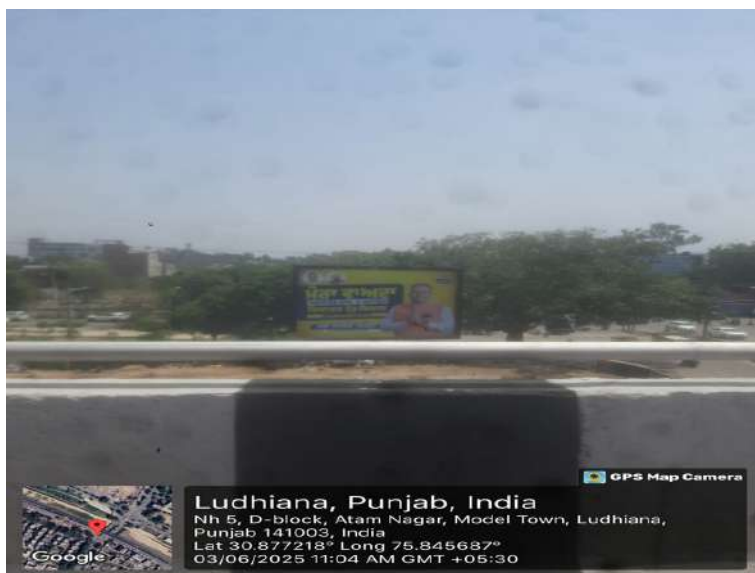




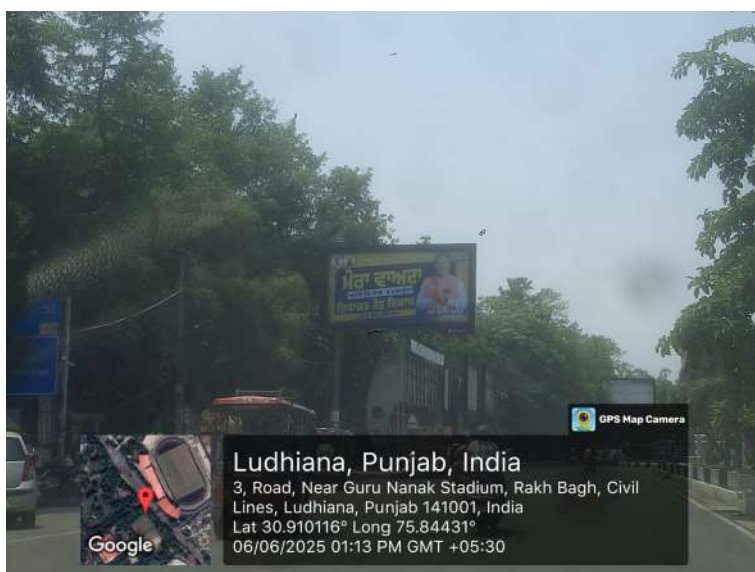


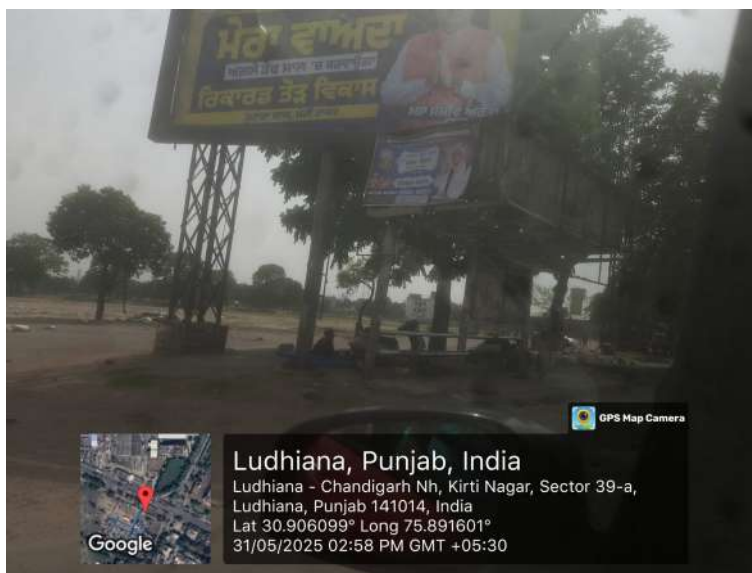






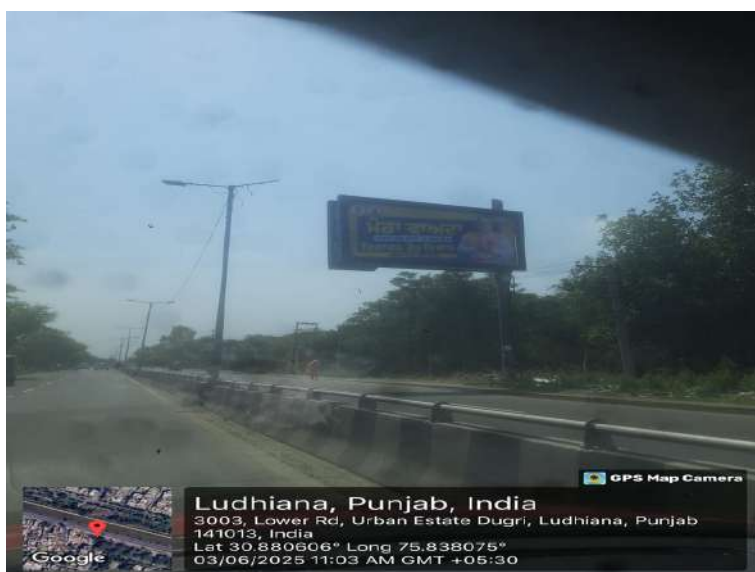










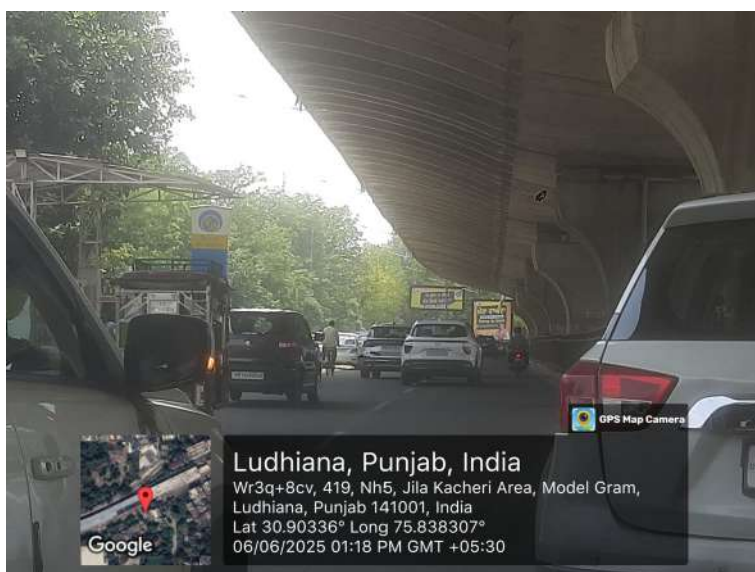
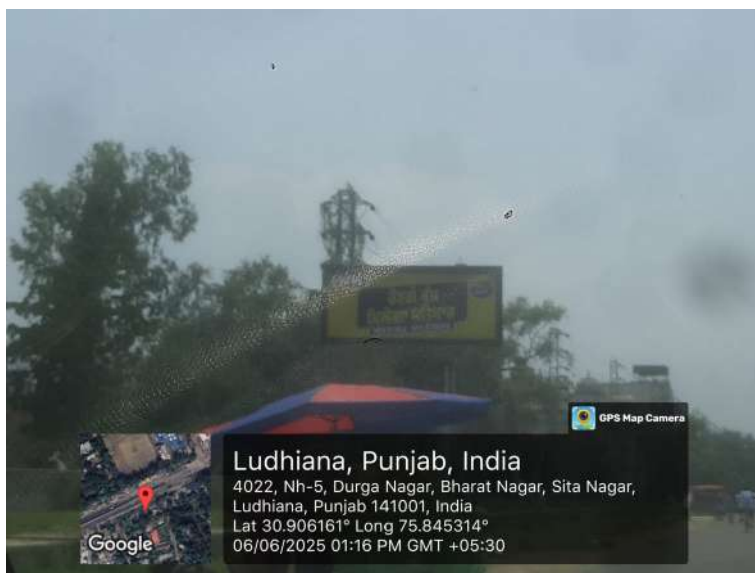
















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