



IN THE HIGH COURT OF KARNATAKA AT BENGALURU

DATED THIS THE 9TH DAY OF DECEMBER, 2025

BEFORE

R

THE HON'BLE MR. JUSTICE SURAJ GOVINDARAJ

WRIT PETITION NO. 29704 OF 2025 (GM-TEN)

BETWEEN:

SRI ANANTHA KRISHNA SHETTY
S/O. LATE APPU MESTRY,
AGED ABOUT 52 YEARS,
OCC BUSINESS,
R/AT BHARATH BEEDI COMPOUND, PERVAJE ROAD,
KARKALA, UDUPI DISTRICT-574 104

...PETITIONER

(BY SRI. PRASANNA V R, ADVOCATE)

AND:

1. MANGALURU CITY CORPORATION
REP. BY ITS COMMISSIONER, MANGALURU,
D.K.DISTRICT-575 001
2. THE DEBARMENT COMMITTEE,
REP. BY ITS CHAIRMAN CUM COMMISSIONER,
MANGALURU CITY CORPORATION, MANGALURU,
D.K.DISTRICT-575 001
3. THE DIRECTOR,
DEPARTMENT OF MUNICIPAL ADMINISTRATION,
VISHWESHWARAIAH TOWERS, PODIUM BLOCK,
DR.B. R. AMBEDKAR ROAD,
BENGALURU 560 001.
4. THE STATE OF KARNATAKA
REP. BY ITS SECRETARY,
DEPT. OF URBAN DEVELOPMENT, VIKASA SOUDHA,
BENGALURU-560 001.

...RESPONDENTS

(BY SRI. NITISH K N, ADVOCATE FOR R1 & R2;

SMT.K.P.YASHODHA, AGA FOR R3 & R4)





THIS WP IS FILED UNDER ARTICLES 226 & 227 OF THE CONSTITUTION OF INDIA PRAYING TO QUASHING THE ORDER DTD 08.09.25 IN NO. MANAPAA/LN.NO.12298/25-26/DM-1 PASSED BY THE R2 , VIDE ANN-X-A.

THIS WRIT PETITION, COMING ON FOR PRELIMINARY HEARING, THIS DAY, ORDER WAS MADE THEREIN AS UNDER:

CORAM: HON'BLE MR JUSTICE SURAJ GOVINDARAJ

ORAL ORDER

1. The petitioner is before this Court seeking for the following reliefs:
 - a. *Issue a writ of Certiorari, quashing the order dtd 08.09.25 in No. MANAPAA/LN.No.12298/25-26/DM-1 passed by the R2 , vide Annx-A.*
 - b. *Issue any other writ or direction to meet the ends of justice.*
2. Though in most cases a contractor would seek to endeavour to retain the contract or challenge the awardal of the contract, this case relates to debarment, in which a contractor has sought to mislead all concerned.
3. Respondent No.1, having issued a tender, the petitioner had participated in the tender, submitted various documents, including his license and earlier



work done. During the initial verification process, the same were verified and found to be proper. Subsequently, on the detailed verification, when the said documents had been forwarded to the concerned authorities, respondent no.1 was informed that those documents were false and fabricated.

4. The electrical licence, which forms the basis for the petitioner to have participated bearing 1CL01946UDP, was indicated by the Chief Electrical Inspector as not having been issued.
5. Insofar as the work done certificates,
 - 5.1. The petitioner had indicated that the Municipal Corporation, Udupi had issued a work order bearing Indent No.129626. The said Municipal Corporation, Udupi, vide its order dated 25.03.2024, had categorically informed respondent no.1 that no such work order



bearing such indent number had been issued by the Udupi Corporation.

5.2. As regard to one other work certificate in respect of work order bearing Indent No.129611 said to have been issued by the Municipal Corporation, Udupi, again the said corporation vide its letter dated 27.03.2024 informed that there was no such work order which had been issued.

5.3. As regards the third work done certificate said to have been issued by the Mangalore Smart City Ltd. bearing Contract No.40/2021 dated 23.06.2020, the petitioner claimed that the work had been done for a sum of Rs.4,62,00,000/-. The Smart City on enquiry had replied that the total bid amount as regards the said work order is Rs.1,92,97,932/-, thus, indicating that the claim on the petitioner was false.



6. In pursuance thereof, the debarment proceedings under Rule 26A of the Karnataka Transparency in Public Procurements (KTPP) Rules, 2000 (for short, 'the KTPP Rules') had been taken up against the petitioner.

7. When the first notice was issued to the petitioner, the petitioner replied to the same, stating that the respondent has to furnish him the details of what the complaint against the petitioner is, and what documents the complainant has furnished. Another notice having been issued, once again the petitioner sought for the same information and in addition sought for cross-examining the complainant. Third notice having been issued, the petitioner persisted with the aforesaid request.

8. The matter having been heard, the impugned order at Annexure-A came to be passed debarring the



petitioner. It is the said order dated 08.09.2025 which is challenged in these proceedings.

9. The submission of Sri.V.R.Prasanna, learned counsel for the petitioner, is that:

9.1. The petitioner has not been given sufficient opportunity to defend the matter inasmuch as the name of the complainant had not been furnished, the details of the complainant had not been furnished, the documents relied upon by the complainant had not been furnished and no opportunity had been granted to the petitioner to cross-examine the complainant.

9.2. His submission is also that there are only minor variations in the quantum of work done and the same cannot be a ground for debarring the petitioner.

9.3. As regards the license, he submits that the petitioner has given a detailed reply as to why there was an issue regarding the license and



that issue having been rectified, the respondent ought to have considered the reply of the petitioner and consider the license bearing No.1CL-182980-UDP to be a proper license.

9.4. His submission is also that the petitioner has filed 12 complaints and 12 appeals regarding the tenders allotted to certain other contractors, and as such, the petitioner has been targeted. On the above basis, he submits that the impugned debarment order is required to be set aside.

10. Sri.Nitish K.N., learned counsel for respondents No.1 and 2 submits that:

10.1.The initial verification of documents had been made by the tender acceptance authority, based on the face value of the document which had been furnished. The said documents, after such initial verification, are sent to the concerned authorities, and it is only after



receipt of information from those authorities that the respondent no.1 came to know about the fraud played by the petitioner on respondent no.1 and, as such, initiated proceedings for debarment under Rule 26A of the KTPP Rules.

10.2. His submission is that the petitioner is not entitled to any complaint or any documents in respect of the debarment proceedings initiated inasmuch as what is alleged is as regard to the documents supplied by the petitioner to be fabricated, and it was for the petitioner to establish that the documents which had been submitted by the petitioner were genuine and valid. No such document had been placed by the petitioner on record before the Debarment Committee.

10.3. Insofar as the non-existence of the license of the petitioner, the explanation given is that



another license which the petitioner has obtained by entering into a partnership with one other individual, subsequent to the submissions of the document in respect to the present tender.

10.4. Two of the work experience documents indicate that those tenders had not even been issued. There is no question of contention being raised by the petitioner that there is a variation in the quantum of work done.

10.5. In respect of the work order issued by the Mangalore Smart City Ltd., the amount of work claimed by the petitioner to have been done is Rs.4,62,00,000/- whereas the said tender was for a sum of Rs.1,92,97,932/- which is less than half the value claimed by the petitioner and it cannot therefore be said that there is a minor variation in the works done by the petitioner.



10.6. His categorical submission is that the petitioner has deliberately sought to mislead the respondents, submitted false documents, and as such, the matter having been referred to the Debarment Committee, the Debarment Committee has granted enough and more opportunity to the petitioner before the impugned order was passed, and this Court ought not to interfere in the matter.

11. Heard Sri.Prasanna V.R., learned counsel for the petitioner, Sri.Nitish K.N., learned counsel for respondents No.1 and 2 and Smt.K.P.Yashodha, learned AGA for respondents No.3 and 4. Perused papers.

12. The points that would arise for consideration are:

- 1. Whether in debarment proceedings under Rule 26A of KTPP Rules, is there a requirement for the Debarment Committee to furnish the details of the complaint, if any received, the documents enclosed along with the complaint, and also to**



- permit the contractor to cross-examine the complainant?
2. Whether in the present case, has sufficient opportunity been provided to the petitioner to defend the proceedings before the Debarment Committee?
 3. Whether in the present case, the petitioner has been able to establish that the documents submitted by the petitioner are genuine, and no action was required to be taken against him?
 4. What order?
13. I answer the above points as under:-
14. **Answer to Point No.1: Whether in debarment proceedings under Rule 26A of KTPP Rules, is there a requirement for the Debarment Committee to furnish the details of the complaint, if any received, the documents enclosed along with the complaint, and also to permit the contractor to cross-examine the complainant?**

14.1. Rule 26A is reproduced hereunder for easy reference:

26A. Debarment of Tenderers by Procurement Entity.- (1) *The Procurement Entity may proceed with debarring such tenderer or contractor or supplier or any of the successor of the tenderer or contractor or supplier who has engaged directly or through an agent in a corrupt or fraudulent practices in participating or competing or executing the contract including misleading the Procurement Entity at any stage of procurement and executing activity.*



(2) The Procurement Entity may, by order, appoint a Committee consisting of such officers not below the rank of Tender Inviting Authority to be the Debarment Committee to consider the proposals for debarring bidder or contractor or supplier and to take a decision thereof.

(3) On the receipt of information, Debarment Committee shall provide a reasonable opportunity, including an oral hearing, to the concerned for making representations before taking a decision.

(4) For consideration of debarment, Tender Inviting Authority or any other officer authorized by Tender Accepting Authority shall furnish the details of such bidders or contractors or suppliers who have engaged in corrupt practice and fraudulent practices to the Debarment Committee constituted under sub rule (2) above.

(5) The Debarment Committee may make recommendations with reasoning in writing, within thirty days from date of receipt of information.

Provided that, the said period may be extended by another fifteen days by Procurement Entity for the reasons to be recorded in writing.

(6) On the recommendations of the Debarment Committee, the Procurement Entity shall by notification debar any of tenderer or contractor or supplier and publish the same on its website and Karnataka Public Procurement Portal and also maintain the list of such tenderer or contractor or the supplier or any of its successors.

(7) The order of debarment shall be deemed to have been automatically revoked on the expiry of the period specified in the debarment order.



14.2. What sub-Rule (3) of Rule 26A of KTPP Rules mandates is that on receipt of the information, the Debarment Committee shall provide a reasonable opportunity, including an oral hearing, to the concerned person for making representations before taking a decision. The said Rule does not provide for a complaint or a document annexed to the complaint to be provided to the contractor. The substance of the allegation is required to be provided, and it is that substance of the allegation which is required to be answered by the contractor.

14.3. The proceedings under Rule 26A are not disciplinary proceedings or criminal proceedings as sought to be made out by learned counsel for the petitioner, for the petitioner to enable cross-examination of the complainant.

14.4. What was required was for the petitioner-contractor to establish the allegations made



against the contractor to be false and not for the petitioner to procrastinate the matter and to sidetrack the same by seeking for documents which he was not entitled to inasmuch as respondent no.1 was required to issue three notices which the petitioner-contractor has conveniently avoided by making various demands which the petitioner was not entitled to.

14.5. As indicated supra Rule 26A(3) mandates that the Debarment Committee shall afford a reasonable opportunity, including an oral hearing, before taking a decision. The Rule does not contemplate a complaint-centric or adversarial adjudication, nor does it provide for supply of complaints, disclosure of complainant identity, or cross-examination.

14.6. The proceedings under Rule 26A are administrative and preventive in nature,



intended to protect the integrity of public procurement. They are neither disciplinary nor criminal proceedings. Consequently, the full rigour of principles applicable to quasi-criminal proceedings is inapplicable.

14.7. What was required to be furnished to the contractor is the substance of allegations, which, in the present case, was clearly conveyed—namely, that the licence and work experience certificates submitted by the petitioner were found to be false upon verification.

14.8. The insistence on cross-examination and disclosure of complaint documents is therefore misconceived and unsupported by the statutory scheme.

14.9. Hence, I answer Point No.1 by holding that a contractor in proceedings under Rule 26A would not be entitled to the complaint or the



documents annexed with the complaint, let alone cross-examine the complainant. He would be entitled only to the gist of the allegations made and answer to those allegations.

15. **Answer to Point No.2: Whether, in the present case, sufficient opportunity has been provided to the petitioner to defend the proceedings before the Debarment Committee?**

And

16. **Answer to Point No.3: Whether in the present case, the petitioner has been able to establish that the documents submitted by the petitioner are genuine, and no action was required to be taken against him?**

16.1. It has been claimed that the documents which had been submitted by the petitioner are genuine documents, and as such, the allegation made against the petitioner that fabricated documents had been furnished is a false assertion made by respondent no.1 on the basis of a false complaint filed by one other contractor.



16.2. From the reading of this file, it is clear that the contractors in this particular location are given to file complaints against each other. The petitioner himself has filed 12 complaints and 12 appeals against the other contractors, probably giving rise to those contractors also filing complaints against the petitioner.

16.3. Be that as it may, irrespective of who the complainant is, what is required to be seen is the veracity of the allegations made. These aspects have been dealt with hereinabove.

16.4. The license claimed by the petitioner to be authentic and genuine bearing No.1CL01946UDP has been found to be a fabricated document. The Chief Electrical Inspector has categorically stated that such a license has not been issued. Even in the reply which has been submitted by the petitioner, he adverts to license bearing No.1CL82980UDP



and claims that this is a license which is genuine and which has been uploaded. The license numbers being completely different, the explanation, which is sought to be offered by the petitioner, was apparently only to mislead the respondents and even in the reply, the petitioner seeks to make allegations against the tender acceptance authority to cover the lapses on the part of the petitioner.

16.5. Insofar as the three tenders which have been furnished by the petitioner to indicate his technical expertise and his past track record, two of the tenders, namely those issued by the Municipal Corporation, Udupi, bearing indent Nos. 19626 and 19611 have been categorically indicated by the Corporation that no such work order with such an indent number had been issued. As regards the third work order said to have been issued by the Mangalore Smart City



Ltd., the petitioner claims that work to an extent of Rs . 4,62,00,000/- had been awarded to the petitioner when in fact the tender value was Rs.1,92,97,932.97. This variation cannot be said to be a minor variation as sought to be contended by the petitioner in his reply, as also learned counsel for the petitioner during the course of his oral arguments today. The difference is more than 50%.

16.6. A contractor, when submitting documents for the purpose of evaluation of a tender, is required to disclose all the necessary requirements in a genuine manner as sought by the tender issuing authority. The contractor cannot furnish false or fabricated documents or make statements which are false. A fiduciary relationship would exist at the time of a tender being submitted, and that fiduciary relationship would have to be discharged by the tenderer in



making truthful statements and not making false statements for a tender issuing authority requiring the tender issuing authority to verify the same and on verification of the said documents to be false, to take action against such contractors.

16.7. All the four issues which have been pointed above, which had been relied upon by the petitioner namely the license, three work orders having been found to be fabricated and no suitable explanation having been submitted by the petitioner except to call on the respondent to furnish copy of the complaint and seek to cross examine the complainant, the petitioner has only sought to delay the proceedings before the Debarment Committee. The petitioner has not established the truthfulness of the documents submitted by him, which was what was required to be done.



- 16.8. The record discloses that:
- 16.8.1. Multiple notices were issued;
 - 16.8.2. The petitioner was afforded oral hearing;
 - 16.8.3. The petitioner was repeatedly called upon to substantiate the authenticity of his documents.
- 16.9. Instead of producing supporting material from the issuing authorities, the petitioner persisted in raising objections extraneous to the scope of Rule 26A, thereby seeking to delay and protract the proceedings.
- 16.10. The requirement of natural justice is fair opportunity, not endless opportunity. The petitioner was afforded more than adequate opportunity and chose not to utilise the same for the purpose for which it was granted.
- 16.11. At the heart of this point lies the integrity of the tender process itself. Public tenders are evaluated on the basis of representations made



by bidders regarding eligibility, technical capacity, and past performance. Documents furnished in that regard are not collateral or incidental; they form the very basis of consideration.

16.12. In proceedings arising out of verification of tender documents, the evidentiary burden operates in two stages:

16.12.1. Initial burden on the procuring authority, which stands discharged once verification by the competent issuing authority establishes that a document is non-existent, false, or materially inaccurate; and

16.12.2. Consequential burden on the contractor, who must then rebut such verification by placing cogent, contemporaneous, and authoritative material on record.



16.13. Once the issuing authority itself certifies that a document was never issued or that the claim is incorrect, the Court is not required to presume genuineness merely because the contractor asserts so. Bare denial or procedural objections do not displace such verification.

16.14. The petitioner relied upon an electrical licence bearing No.1CL01946UDP. The Chief Electrical Inspector, who is the sole competent authority, categorically stated that no such licence was ever issued.

16.15. The petitioner's attempt to rely upon a different licence bearing No.1CL82980UDP does not advance his case. Tender eligibility is required to be satisfied as on the date of submission of the bid. Subsequent acquisition of qualifications, licences, or arrangements, whether by partnership or otherwise, cannot retrospectively validate an ineligible bid.



16.16. Tender conditions are not ambulatory. They operate with reference to a defined cut-off date, failing which the sanctity of competitive bidding would be irreparably compromised.

16.17. With respect to Indent Nos.129626 and 129611, the Municipal Corporation, Udupi, categorically confirmed that no such work orders were ever issued. These confirmations are official, unambiguous, and leave no scope for interpretative doubt.

16.18. The petitioner did not produce any supporting material such as bills, payment records, completion certificates, or correspondence to counter these confirmations. In tender jurisprudence, silence in the face of authoritative verification cannot negate it.

16.19. The petitioner's claim of having executed work worth ₹4,62,00,000/- under a tender whose entire sanctioned value was ₹1,92,97,932/-



cannot be explained away as a variation. The claim exceeds the tender value by more than 50%, which is neither marginal nor accidental.

16.20. No explanation was offered as to how such escalation could lawfully occur, nor was any material produced to support the claim. The misstatement goes to the root of technical eligibility and cannot be treated as a clerical error.

16.21. A bidder in a public tender stands in a position of fiduciary responsibility. The procuring authority is entitled to proceed on the assumption that representations made are truthful. Verification is a safeguard, not a substitute for truthfulness.

16.22. The submission of documents that are subsequently found to be non-existent or materially false constitutes a serious breach of that fiduciary obligation. The State cannot be



compelled to continue business relations with a contractor whose foundational representations are demonstrably unreliable.

16.23. It is clarified that the finding of falsity in the present proceedings is administrative and objective, confined to determining eligibility and suitability under Rule 26A, and does not amount to a determination of criminal culpability.

16.24. The present case does not involve a solitary discrepancy. It involves:

16.24.1. A licence that never existed;

16.24.2. Two work orders that were never issued;

and

16.24.3. A grossly inflated claim in respect of the third work.

16.25. Taken cumulatively, these facts establish a pattern of misrepresentation affecting eligibility itself. In such circumstances, debarment is



neither arbitrary nor excessive; it is a necessary measure to protect the integrity of public procurement.

16.26. I answer Point No.2 by holding that in the present case, sufficient opportunity has been provided to the petitioner to defend the proceedings before the Debarment Committee.

16.27. I answer Point No.3 by holding that in the present case, the petitioner has not been able to establish that the documents submitted by the petitioner are genuine, and that no action was required to be taken against him. In fact, all the allegations against the petitioner have been established and proven.

17. This is not a stray case, there are several matters coming up before this court wherein false documents have been furnished during the tender submission process, which indicates systemic vulnerabilities in the procurement processes of public bodies, which



have resulted in repeated submission of false and forged documents by unscrupulous tenderers, thereby occasioning substantial loss to the public exchequer and undermining the integrity of public procurement and needless to say several unnecessary litigations;

18. A comprehensive methodology for the prevention of submission of false documents in public procurement through structured utilisation of Information Technology, is required to be implemented by the Government of Karnataka and all procuring entities so as to take proactive action in such matters.
19. The integrity of public procurement is not merely an administrative imperative but a constitutional mandate flowing from the principles of Article 14 (equality) and Article 19 of the Constitution, as it directly impacts the quality of public works, compliance with applicable rules, freedom to carry



on trade and profession, and protection of public resources;

20. In that view of the matter I'am of the considered opinion that the Government of Karnataka would have to formulate a standard operating procedure or the like in respect of the tendering process by taking into account the following factors:

General Directions

21. Any framework designed to prevent submission of false documents must rest upon the following cardinal principles, which shall guide all its implementation:

21.1. Prevention Over Punishment: The primary objective of the framework is early detection and prevention of false document submission at the tender design and submission stages, rather than reliance upon post-award cancellation or purely punitive remedies.



Technology-enabled real-time verification shall be prioritised over post-facto investigation.

21.2. Objective Verification: All determinations regarding document authenticity shall rest upon:

21.2.1. Cross-verification with issuing authority databases;

21.2.2. Reliance upon certified records maintained by statutory bodies;

21.2.3. System-generated data matching;

21.3. Clarity of Burden and Contractual Competence: Every tenderer, at the moment of bid submission, undertakes that:

21.3.1. All documents submitted are authentic, unmodified, and currently valid as of the bid submission date;

21.3.2. The burden of authenticity rests with the tenderer, not with procuring entities;



21.3.3. No post-bid rectification, renewal, or re-issuance shall cure a false or expired document at the bid submission date.

22. Technology as Enabler, Not Substitute:

Technology shall serve as an enabler of verification, automation, and procedural efficiency. It shall NOT be a substitute for judicial review, human judgment, or procedural fairness.

23. Scope of Digitalisation: All public procurement processes in the State of Karnataka shall, shall mandate electronic submission of tender documents through the E-Procurement Portal.

24. Document Format and Metadata Requirements:

All documents shall be uploaded in the following formats:

Document Category	Mandatory Format	Metadata Fields	Validation Rule
Certificates, Licenses, Permits	PDF (searchable)	Issuing Authority Code; Issue Date;	System-auto-reject if fields



Document Category	Mandatory Format	Metadata Fields	Validation Rule
		Expiry Date; Reference Number; Signature Hash	blank
Work Orders, Contracts	PDF + Extracted Text	Client Entity; Contract Period; Tender Value; PO Number; Completion Status	Cross-verify with portal database
Financial Statements	PDF + Excel (structured)	FY; Total Turnover; Net Profit; Auditor Name; Audit Date	Validate against MCA/ROC records
Experience Certificates	PDF + Structured Data	Client Name; Project Description; Duration; Contract Value; Certifying Officer Details	Cross-verify with work order

25. **Metadata Validation:** The portal shall automatically generate a report citing reasons for rejecting any upload where mandatory metadata fields are left



blank or contain obviously spurious data (e.g., validity periods exceeding the natural tenure of the document type). Standardised metadata enables automated cross-verification without manual intervention. It also creates an immutable audit trail of document provenance.

26. The Department of e-Governance shall, prepare and notify a "Document Validation Taxonomy" specifying for each document type:

Document Type	Validation Rule	Mandatory Cross-Reference	System Action on Failure
Professional Licenses (e.g., Engineering, Architecture, Medical)	License must be active; must not be suspended or cancelled	State Professional Council Database or Central Registry	Auto-reject if not found or status is inactive
Work Orders / Past Performance	Project entity name, contract value, and completion date must be verified against issuing	Issuing entity's MIS or central procurement database	Flag for manual verification if variance > 10%



Document Type	Validation Rule	Mandatory Cross-Reference	System Action on Failure
	organisation records		
Experience Certificates	Issuer (company/project owner) must exist; certifying officer must be identifiable; project duration must be reasonable	Company Registration Database (MCA); Project records maintained by client	Auto-reject if issuer unverifiable; show-cause if officer unidentifiable
Statutory Clearances (GST, Environmental, Labour)	Certificate status must be "Active" or "Compliant"; no defaults or violations recorded	GST India Portal; Central Pollution Control Board; Ministry of Labour database	Auto-reject if status is inactive/suspended
Financial Documents	Audited financial statements must match ROC filings; turnover figures must be internally consistent	Registrar of Companies; RBI CIBIL database	Flag for manual review if unexplained variance
Bank/Performa	Document must match that	Database of Bank Guarantees to be	Auto-reject if issuer Bank is



Document Type	Validation Rule	Mandatory Cross-Reference	System Action on Failure
nce Guarantee	issued by the Bank	established by the Banks	unverifiable; Auto Reject if document not found on the issuer database, show-cause if there is variance >10%

27. The portal shall enforce these rules at the point of upload. Documents failing validation shall be:

27.1. Immediately rejected with an automated notice specifying:

27.1.1. The validation rule violated;

27.1.2. The specific field or information that failed;

27.1.3. Remedial action required (if permissible within the "no-rectification" rule);



27.1.4. Opportunity to resubmit (only for technical defects, not substantive false information).

28. **Logged in a portal audit trail**, including date and timestamp, document hash, and reason for rejection. Automated validation prevents ineligible bids from reaching the evaluation stage and eliminates subjective assessments by procurement officials.

29. **Scope and Mandate**: The Government of Karnataka shall, establish and operationalise Application Programming Interfaces (APIs) between the E-Procurement Portal and databases maintained by:

29.1. Licensing and Regulatory Authorities:

Professional councils, State Professional License Boards, environmental agencies;

29.2. Municipal and Local Bodies: Municipal corporations, gram panchayats, district administrations;



29.3. **Government Public Sector Undertakings and Special Purpose Vehicles:** State-owned enterprises, smart city entities, infrastructure development boards etc.,;

29.4. **Financial Regulators:** ROC (Ministry of Corporate Affairs), GST India Portal, RBI;

29.5. **Central Databases:** CEDCAP (Government e-Marketplace), CPSE Portal.

29.6. **Banks and Financial Institutions**

30. **Nature of API Verification:** Wherever real-time API connectivity is feasible, the portal shall automatically:

30.1. **Confirm Existence:** Verify that the licence, permit, certificate, or work order exists in the issuing authority's database;

30.2. **Match Identifiers:** Cross-reference the reference number, issue date, and validity period submitted by the tenderer with authoritative records;



- 30.3. **Validate Status:** Confirm the current status of the document (Active, Suspended, Cancelled, Expired) as of the bid submission date;
- 30.4. **Threshold Verification:** For work orders and experience certificates, verify that contract value and scope align with tender requirements (within a tolerance of $\pm 10\%$);
- 30.5. **Historical Compliance:** Flag any history of violations, complaints, or non-compliance recorded against the tenderer in issuing authority records.
31. **Establishment of Registry:** The Government of Karnataka shall establish and maintain a Centralised State Debarment Registry (SDR).
32. **Analytics Dashboard and Data-Driven Policy Interventions:** The E-Procurement Portal shall maintain a real-time Analytics Dashboard accessible to the State Finance Department and Government of Karnataka, tracking:



Metric	Measurement	Update Frequency	Purpose
False Document Frequency	Number of bids rejected due to false documents per month; trend over quarters	Monthly	Assess systemic fraud rates
Department-wise Incidence	Which departments have highest false submission rates	Quarterly	Identify departments needing training
Document-Type Vulnerability	Which document types are most frequently fabricated (e.g., licences vs. certificates)	Quarterly	Target policy interventions
Procurement Volume	Total bids submitted, percentage rejected, percentage debarred	Monthly	Monitor system health
Verification Success Rate	% of bids cleared without issues, % flagged, % debarred	Quarterly	Assess verification effectiveness



Metric	Measurement	Update Frequency	Purpose
Debarment Trends	Contractors debarred; average debarment period; repeat violators	Semi-annual	Assess deterrent effect

33. **Policy Intervention Framework:** Based on dashboard data, the Government shall conduct quarterly reviews to identify:

33.1. High-Risk Document Types,

33.2. High-Fraud Departments.

33.3. Repeat Violators,

34. **Public Reporting:** A sanitised version of the Analytics Dashboard (excluding contractor-identifiable information) shall be published quarterly on the State e-Governance portal to promote transparency and deter fraud.



35. **KTPP and GEMS Portal:** All the above would be part of the Karnataka Transparency of Procurement Portal, as well as the GEMS Portal.
36. The Principal Secretary, e-governance, and the Principal Secretary, Finance, may consider such other and further requirements as may be required to be incorporated in the above system. The points which have been detailed above are only indicative and not exhaustive. A report regarding the implementation of the above is to be submitted in 6 weeks' time from the date of receipt of a copy of this order.
37. **Answer to Point No.4:** In view of my answer to Points No.1 to 3 above and in view of my findings to the aforesaid paras, there are no grounds made out in the present petition, and as such, I pass the following:



ORDER

- i) The Writ petition stands ***dismissed***.
- ii) Taking into consideration that there are serious allegations which have been made against the petitioner and the petitioner has sought to fabricate documents and place it before respondent no.1, respondent no.1 would always be at liberty to initiate such criminal proceedings as may be permissible against the petitioner under law.
- iii) Though the above matter is disposed of, relist on 24.02.2026 to report compliance with general directions.
- iv) Leaned AGA is directed to inform the Principal Secretary, e-governance, and the Principal Secretary, Finance, about the above order.
- v) Registry to furnish a copy of the above order to the Learned AGA.



- vi) Registrar Judicial is also directed to forward the above order to the Principal Secretary, e-governance, and the Principal Secretary, Finance.
- vii) Registry is directed to print the name of MS Sarita Kulkarni Learned AGA as that appearing for the State.

**Sd/-
(SURAJ GOVINDARAJ)
JUDGE**

PRS
List No.: 1 SI No.: 52