

BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT

RESERVED ON : 27.01.2026 & 28.01.2026

DELIVERED ON : 29.06.2026

CORAM:

THE HONOURABLE MR.JUSTICE **B.PUGALENDHI**

WP(MD)Nos.1266, 1411, 2011, 2805, 6243, 23151 of 2024;
13587, 26490, 26701, 27149, 27437, 33810 of 2025

&

WMP(MD)Nos.1293, 1295, 1443, 2012, 2013,
2806, 5856, 5858, 19618, 19619 of 2024;
9794, 9795, 9797, 20556, 20703, 20704,
21081, 21082, 21087, 21364, 26703, 27065,
27675 to 27678 of 2025; 1612 of 2026

WP(MD)No.1266 of 2024:-

M.Kalaivani

: Petitioner

Vs.

1.The Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road,
Park Town,
Chennai – 600 003.

2.The Registrar,
Madurai Kamaraj University,
Madurai – 625 021.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorarified Mandamus calling for the records relating to the impugned show cause notice vide reference no. 6543/OTD-B1/2017-3 dated 05.01.2024 issued by the first respondent, quash the same and consequently, directing the first respondent to wait till the proceedings are completed in the investigation taken by the third respondent and a final report is filed.

WP(MD)No.1411 of 2024:-

S.Swapna (Transgender)

: Petitioner

Vs.

1.The Secretary,
Tamil Nadu Public Service Commission,
VOC Nagar, Park Town,
Chennai – 600 003.

2.The Registrar,
Madurai Kamaraj University,
Madurai.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
Madurai.

: Respondents

[R.3 suo-motu impleaded vide order dated 23.01.2024]

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order in Memorandum No.6543/OTD-B1/2017-4 dated 05.01.2024 issued by the first respondent and quash the same.

WP(MD)No.2011 of 2024:-

K.C.Sathish Kumar

: Petitioner

Vs.

1.Tamil Nadu Public Service Commission,
Rep. by its Secretary,
TNPSC Road,
VOC Nagar, Park Town,
Chennai – 600 003.

2.Madurai Kamaraj University,
Rep. by its Registrar,
Palkalai Nagar,
Madurai.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
Madurai.

: Respondents

[R.3 suo-motu impleaded vide order dated 01.02.2024]

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorarified Mandamus calling for the records relating to the impugned order in Memorandum No.6543/OTD-B1/2017-2 dated 05.01.2024 issued by the first respondent, quash the same and consequently, directing the first respondent to drop all further proceedings against the petitioner.

WP(MD)No.2805 of 2024:-

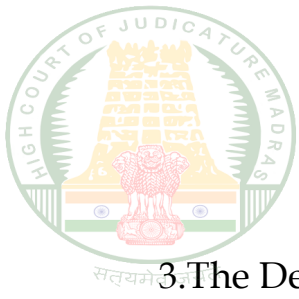
N.A.Chanheetha

: Petitioner

Vs.

1.The Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road, Park Town,
Chennai.

2.The Registrar,
Madurai Kamaraj University,
Madurai.



WP(MD)Nos.1266 of 2024, etc., batch

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3. The Deputy Superintendent of Police,
Vigilance and Anti Corruption Wing,
No.1/165G, Alagarkovil Road,
Madurai - 2.

: Respondents

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned show cause notice in Memorandum No.6543/OTD-B1/2017-1 dated 05.01.2024 issued by the first respondent and quash the same.

WP(MD)No.6243 of 2024:-

M.Kalaivani

: Petitioner

Vs.

1. The Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road,
Park Town,
Chennai – 600 003.

2. The Registrar,
Madurai Kamaraj University,
Madurai – 625 021.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorarified Mandamus calling for the records relating to the impugned show cause notice in reference No. 6937/OTD-B1/2019 dated 23.01.2024 issued by the first respondent, quash the same and consequently, directing the first respondent to wait till the proceedings are completed in the investigation taken up by the third respondent and a final report is filed.

WP(MD)No.23151 of 2024:-

N.A.Chanheetha

: Petitioner

Vs.

1.The Registrar,
Madurai Kamaraj University,
Palkalai Nagar,
Madurai – 625 021.

2.The Deputy Superintendent of Police,
Directorate of Vigilance and Anti Corruption,
Madurai District.

: Respondents

[R.2 *suo-motu* impleaded vide order dated 27.09.2024]



WP(MD)Nos.1266 of 2024, etc., batch

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PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order in Ref:MKU/DDE/V&AC/P&D 2023 dated 09.11.2023 issued by the first respondent as against the petitioner and quash the same.

WP(MD)No.13587 of 2025:-

S.Swapna (Transgender)

: Petitioner

Vs.

1.The State of Tamil Nadu,
Rep. by its Additional Chief Secretary to Government,
Commercial Taxes and Registration Department,
Secretariat, St.George Fort,
Chennai.

2.The Secretary,
Tamil Nadu Public Service Commission,
VOC Nagar, Park Town,
Chennai – 600 003.

3.The Registrar,
Madurai Kamaraj University,
Madurai – 625 021.

4.The Commissioner of Commercial Tax,
Chennai – 5.

: Respondents



WP(MD)Nos.1266 of 2024, etc., batch

PRAYER: Petition filed under Article 226 of the Constitution of India

seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order passed by the first respondent in G.O(D)No.48, Commercial Taxes and Registration (E1) Department dated 03.03.2025 and quash the same.

WP(MD)No.26490 of 2025:-

N.A.Chanheetha

: Petitioner

Vs.

1.The Deputy Secretary,
Tamil Nadu Public Service Commission,
Rep. by its Secretary,
TNPSC Road, VOC Nagar,
Park Town,
Chennai – 600 003.

2.The Madurai Kamaraj University,
Rep. by its Registrar,
Palkalai Nagar,
Madurai – 625 021.

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

[R.3 *suo-motu* impleaded vide order dated 27.01.2026]



WP(MD)Nos.1266 of 2024, etc., batch

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PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned proceedings in Memorandum No.6543/QT-D-A3/2017-1 dated 04.09.2025 issued by the first respondent and quash the same.

WP(MD)No.26701 of 2025:-

K.C.Sathish Kumar

: Petitioner

Vs.

1.Tamil Nadu Public Service Commission,
Rep. by its Secretary,
TNPSC Road, VOC Nagar,
Park Town,
Chennai – 600 003.

2.Madurai Kamaraj University,
Rep. by its Registrar,
Palkalai Nagar,
Madurai – 21.

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

[R.3 *suo-motu* impleaded vide order dated 27.01.2026]



WP(MD)Nos.1266 of 2024, etc., batch

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PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorarified Mandamus calling for the records relating to the impugned order in Memorandum No.6543/OTD-A3/2017-2 dated 04.09.2025 issued by the first respondent, quash the same and consequently, directing the first respondent to keep all further proceedings in abeyance till the outcome of the criminal case registered in Crime No.12 of 2024 against the petitioner.

WP(MD)No.27149 of 2025:-

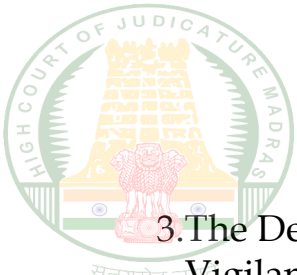
Kalaivani

: Petitioner

Vs.

1.The Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road,
Park Town,
Chennai – 600 003.

2.The Registrar,
Madurai Kamaraj University,
Madurai – 625 021.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

[R.3 suo-motu impleaded vide order dated 27.01.2026]

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order in Memorandum No.6937/OTD-A3/2019 dated 08.09.2025 issued by the first respondent and quash the same.

WP(MD)No.27437 of 2025:-

S.Swapna (Transgender)

: Petitioner

Vs.

1.The Deputy Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road, VOC Nagar,
Park Town,
Chennai – 600 003.

2.Madurai Kamaraj University,
Rep. by its Registrar,
Palkalai Nagar,
Madurai – 625 021.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai – 625 002.

: Respondents

[R.3 suo-motu impleaded vide order dated 27.01.2026]

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order in Memorandum No.6543/OTD-A3/2017-4 dated 04.09.2025 issued by the first respondent and quash the same.

WP(MD)No.33810 of 2025:-

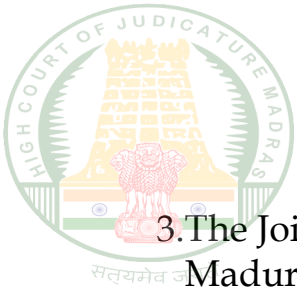
S.Swapna (Transgender)

: Petitioner

Vs.

1.The State of Tamil Nadu,
Rep. by its Secretary to Government,
Commercial Taxes and Registration Department,
Secretariat,
Chennai.

2.The Commissioner of Commercial Taxes,
O/o.Commissioner of Commercial Taxes,
Ezhilagam,
Chepauk, Chennai.



WP(MD)Nos.1266 of 2024, etc., batch

3.The Joint Commissioner (ST),
Madurai Division,
Madurai.

4.The Deputy Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road, VOC Nagar,
Park Town,
Chennai – 600 003.

5.Madurai Kamaraj University,
Rep. by its Registrar,
Palkalai Nagar,
Madurai – 625 021.

: Respondents

PRAYER: Petition filed under Article 226 of the Constitution of India seeking issuance of a Writ of Certiorari calling for the records relating to the impugned order in G.O(D)No.360, Commercial Taxes and Registration (E1) Department dated 14.11.2025 issued by the first respondent and quash the same.

Appearances:-

For Petitioner : Mr.N.Anandha Padmanabhan,
Senior Counsel
for M/s.APN Law Associates
in WP(MD)Nos.1266, 6243 of 2024,
27149 of 2025



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WP(MD)Nos.1266 of 2024, etc., batch

Mr.T.Aswin Rajasimman
in WP(MD)Nos.2011 of 2024,
26701 of 2025

Mr.M.P.Senthil
in WP(MD)Nos.2805, 23151 of 2024,
26490 of 2025

Mr.H.Mohammed Imran
in WP(MD)Nos.1411 of 2024,
13587, 27437, 33810 of 2025

For Respondents:

Mr.J.Anand Kumar,
Standing Counsel for TNPSC
(In all WPs)

Mr.Isaac Mohanlal,
Senior Counsel
for Mr.K.Ragatheesh Kumar
for Madurai Kamaraj University
(In all WPs)

Mr.S.Ravi,
Additional Public Prosecutor
for Vigilance & Anti Corruption Wing
(In all WPs)

Mr.G.V.Vairam Santhosh,
Additional Government Pleader
for R.1, R.4 in WP(MD)No.13587/2025
for R.1 to R.3 in WP(MD)No.33810/2025



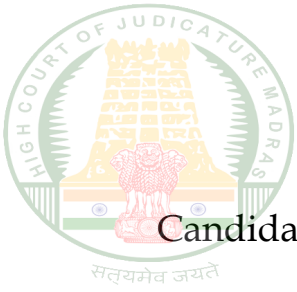
WP(MD)Nos.1266 of 2024, etc., batch

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COMMON ORDER

Reservation is a welfare measure adopted by the State to advance substantive equality by ensuring preferential opportunities in education and public employment for disadvantaged and underrepresented sections of society. Pursuant to the same, the Government of Tamil Nadu enacted the Tamil Nadu Appointment on Preferential Basis in the Services under the State of Persons Studied in Tamil Medium Act, 2010 (hereinafter referred to as the "PSTM Act"), to promote and protect the interests of candidates who pursued their education through Tamil medium. The Act provides for 20% preferential reservation in all direct recruitments to State services for persons who have studied in Tamil medium. Correspondingly, the Tamil Nadu Public Service Commission (hereinafter referred to as the "TNPSC") earmarked a separate 20% quota for Persons Studied in Tamil Medium ("PSTM").

2.However, the reservation under the PSTM Act has allegedly been misused, thereby depriving the genuine beneficiaries of its protection.



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Candidates who had not undergone their schooling in Tamil medium allegedly secured the benefit of the reservation by obtaining only the prescribed degree qualification through Tamil medium. Serious allegations have also surfaced that certain candidates procured fake degree certificates from various Universities in order to fraudulently avail the benefit of the PSTM reservation.

3. Alleging such widespread malpractices, one G.Sakthi Rao filed WP(MD)No.8025 of 2020 as a Public Interest Litigation challenging the recruitment to various posts under the Combined Civil Services-I Examination (Group-I Services) pursuant to Notification No.1 of 2020 dated 20.01.2020. The petitioner contended that candidates who had not completed their entire schooling and college education through Tamil medium had been selected under the PSTM quota. The petitioner consequently sought directions to permit only those candidates who had completed their entire education, namely, 10th Standard, 12th Standard and Degree, through Tamil medium to claim the benefit of the PSTM reservation, to frame appropriate rules governing the PSTM quota, and to



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restrain the Universities from issuing PSTM certificates for distance education courses.

4.While dealing with the said Public Interest Litigation, a Division Bench of this Court, by order dated 23.02.2021, took note of the pending vigilance enquiry relating to serious irregularities in the Madurai Kamaraj University (hereinafter referred to as "MKU"), including malpractices in the conduct of examinations, collection of fees, missing answer sheets and issuance of fake certificates. Thereafter, by order dated 22.03.2021, the Division Bench directed the Director of Vigilance and Anti-Corruption to constitute a Special Team headed by an officer not below the rank of Deputy Superintendent of Police to investigate the irregularities in the conduct of examinations and issuance of false certificates, including false PSTM certificates, in MKU and to complete the investigation within a time-bound schedule. The said orders were challenged before the Hon'ble Supreme Court in SLP (Civil) Nos.3364 to 3367 of 2022, which came to be dismissed on 31.07.2023. Meanwhile, the Principal Secretary to Government, Higher Education Department, also forwarded allegations



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concerning the Directorate of Distance Education of MKU to the Vigilance Department, pursuant to which an enquiry was registered in D.E. 24/2020/EDN/M.

5.Pursuant to the directions of the Division Bench, the Deputy Superintendent of Police, Vigilance and Anti-Corruption, Madurai, commenced investigation. The investigation agency collected the details of the candidates who had secured appointment to the Group-I services under the PSTM quota on the strength of PSTM certificates issued by MKU. Communications were therefore addressed to the University calling for relevant records relating to their degree and PSTM certificates. Although the investigation commenced in the year 2021, the University delayed furnishing the required documents and took a stand that certain records were unavailable. Consequently, the petitioner in WP(MD)No.8025 of 2020 initiated contempt proceedings in Cont.P(MD)No.918 of 2021 alleging non-compliance with the directions issued by the Division Bench. Subsequently, the Vigilance Department was impleaded in the contempt proceedings on 26.07.2022 and MKU was impleaded on 25.08.2022. Thereafter, upon



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directions issued by the Division Bench requiring the University to extend full cooperation to the investigating agency, the necessary records were furnished. On verification of those records, the Vigilance Department found that the petitioners herein had allegedly obtained bogus degree certificates without following the prescribed admission procedure or the payment of the requisite registration fees. A preliminary enquiry was accordingly conducted, and prior approval under Section 17A of the Prevention of Corruption Act was obtained on 05.09.2024. Thereafter, a regular case in Crime No.12 of 2024 was registered on 03.10.2024 against the petitioners and certain officials of MKU for offences under Sections 120-B, 420, 465, 467, 468, 167 and 471 read with Section 109 of the Indian Penal Code and Section 7 of the Prevention of Corruption Act, 1988.

6.All the petitioners were selected pursuant to Notification No.1 of 2019 dated 01.01.2019 issued for the Combined Civil Services-I Examination (Group-I Services) 2016-2019 and were appointed to various Group-I posts through the TNPSC. In addition, Kalaivani was also selected in the Group-I Recruitment Examination, 2020. Chanheetha, the petitioner in



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WP(MD)Nos.23151 of 2024, 2805 of 2024 and 26490 of 2025, was appointed as Deputy Collector. K.C.Satish Kumar, the petitioner in WP(MD)Nos.2011 of 2024 and 26701 of 2025, was appointed as Assistant Commissioner (Commercial Taxes). Swapna, the petitioner in WP(MD)Nos.1411 of 2024, 13587 of 2025 and 27437 of 2025, was appointed as Assistant Commissioner (Commercial Taxes). Kalaivani, the petitioner in WP(MD)Nos.1266 of 2024, 6243 of 2024 and 27149 of 2025, was appointed as Deputy Superintendent of Police (Category-I) pursuant to the Group-I Examination, 2016-2019 and was subsequently appointed as Deputy Collector in the Group-I Recruitment Examination, 2020.

7.During the course of investigation, the DSP, Vigilance and Anti-Corruption, by communication dated 24.02.2023, requested the TNPSC to verify the genuineness of the certificates produced by the petitioners. The TNPSC, after collecting the relevant particulars and records from the concerned departments, including MKU, forwarded the same to the Vigilance Department. The Vigilance Department also informed the TNPSC regarding the registration of the criminal case against the petitioners.

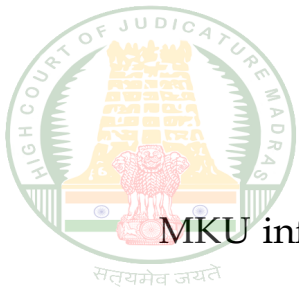


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8. Thereafter, the TNPSC issued show cause notices calling upon the petitioners to explain the genuineness of the PSTM certificates produced by them during the selection process. The said show cause notices have been challenged in WP(MD)Nos.1411 of 2024 (Swapna), 2011 of 2024 (Satish Kumar), 2805 of 2024 (Chanheetha), and 1266 and 6243 of 2024 (Kalaivani). Subsequently, the TNPSC passed final orders cancelling the provisional selection of the petitioners. Those orders are under challenge in WP(MD) Nos.27437 of 2025 (Swapna), 26701 of 2025 (Satish Kumar), 26490 of 2025 (Chanheetha), and 27149 of 2025 (Kalaivani). Apart from the above, Swapna has challenged the order dated 03.03.2025 placing her under suspension in WP(MD)No.13587 of 2025 and the order dated 14.11.2025 cancelling her appointment as Assistant Commissioner (Commercial Taxes) in WP(MD)No.33810 of 2025.

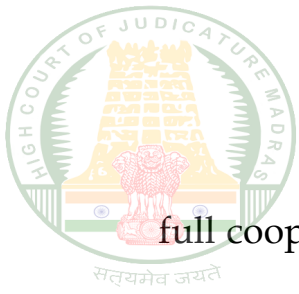
9. As the Vigilance Department entertained doubts regarding the validity of the degrees obtained by the petitioners, it sought clarification from MKU by communication dated 17.10.2023. By reply dated 09.11.2023,



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WEB COPY MKU informed the Vigilance Department that the degrees obtained by the petitioners were not valid. Challenging the said communication, Chanheetha filed WP(MD)No.23151 of 2024. Subsequently, by proceedings dated 16.10.2025, MKU cancelled the degree certificates of Chanheetha, Satish Kumar and Kalaivani. Thereafter, the Vigilance Department filed an objection report dated 31.10.2025 stating that the degree certificate obtained by Swapna had also been issued in violation of the University Regulations and required cancellation. Acting upon the materials furnished by the Vigilance Department, MKU cancelled Swapna's degree on 27.11.2025. These orders of cancellation have been challenged in WP(MD)No.23151 of 2024 (Chanheetha), WP(MD)No.32860 of 2025 (Kalaivani), WP(MD)No. 33121 of 2025 (Satish Kumar) and WP(MD)No.36348 of 2025 (Swapna).

10.Taking note of these subsequent developments, the Division Bench, by order dated 05.06.2026, closed Cont.P.(MD) No.918 of 2021 while directing the Vigilance Department to ensure that the investigation into the issuance of fake degree certificates by MKU reaches its logical conclusion. The Division Bench further directed the Universities concerned to extend



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full cooperation to the investigation and to take appropriate steps to cancel the degrees of candidates who had obtained such bogus degrees.

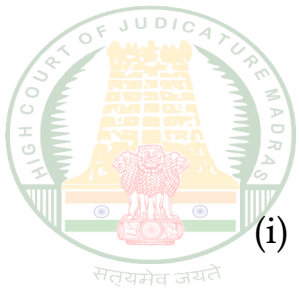
11.Since all these writ petitions arise out of the common issue relating to the genuineness of the PSTM certificates and the consequential actions taken by the authorities, they were heard together and are being disposed of by this common order.

Petitioners' Case:-

12.The case of the petitioners, as advanced by the respective learned Senior Counsel / Counsel, is summarised hereunder.

13.Chanheetha:-

(a) WP(MD)No.23151 of 2024: *Challenge to the communication dated 09.11.2023 issued by the Madurai Kamaraj University informing the Deputy Superintendent of Police, Vigilance and Anti-Corruption, Madurai, that the PSTM certificate issued to the petitioner was not valid.*



(i) The petitioner submitted that she had enrolled in the B.A. History (Tamil Medium) course offered by the Directorate of Distance Education, Madurai Kamaraj University, through Life Educational Trust, Theni, a recognised study centre, on 30.06.2014 and was allotted an enrolment number by the University. Since she was nursing her new-born child and was simultaneously preparing for the Group-II Civil Services Examination, 2015, in which she had qualified for the main examination, she opted to write all the papers in a single sitting. According to the petitioner, she completed all the admission formalities by submitting the prescribed applications and remitting the requisite fees through the study centre.

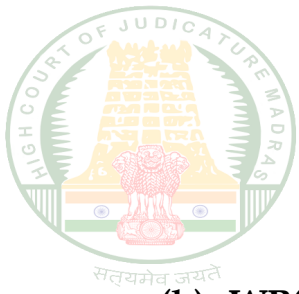
(ii) It was further submitted that the Directorate of Distance Education had erroneously recorded her medium of instruction as English instead of Tamil. To rectify the mistake, she paid a sum of Rs.1,000/- on 05.05.2017 towards change of medium. Likewise, though the University initially issued a mark statement dated 05.04.2017 showing that she had not appeared for three papers, the mistake was subsequently rectified and a fresh mark statement was issued. According to the petitioner, these errors



committed by the University cannot lead to an inference that she had never been admitted to the course.

(iii) The petitioner further contended that she had paid the registration fee and tuition fee through the recognised study centre. Even according to the official website of the University, the said study centre was in arrears of a sum of Rs.1,01,50,162/- payable to the University as on June 2020. Since the University is the lawful custodian of all admission records, she cannot be faulted for any discrepancy in the remittance of the registration fee by the study centre.

(iv) It was lastly submitted that the University itself had issued the petitioner the course completion certificate, mark statements, no due certificate and degree certificate. Therefore, the subsequent communication declaring the PSTM certificate to be invalid solely on the ground that the admission fee paid by the petitioner was not reflected in the University records is arbitrary and unsustainable.



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(b) WP(MD)No.2805 of 2024: *Challenge to the show cause notice dated 05.01.2024 issued by the TNPSC proposing to reject the petitioner's candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and her selection to the post of Deputy Collector.*

(i) The petitioner submitted that the impugned show cause notice had been issued mechanically solely on the basis of the communication dated 09.11.2023 received from the University stating that the PSTM certificate issued to her was not valid. According to the petitioner, the TNPSC failed to independently consider the other records issued by the University, namely, the mark statements, course completion certificate and provisional degree certificate.

(ii) It was further submitted that the petitioner had duly paid the prescribed fees through the recognised study centre and therefore cannot be penalised for the failure of the study centre to remit the same to the University. It was also contended that the errors committed by the University in recording her medium of instruction as English and in issuing

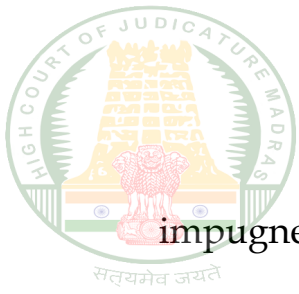


the original mark statement had subsequently been rectified and, therefore, those mistakes cannot be relied upon to dispute the validity of the petitioner's enrolment or her PSTM certificate.

(c) WP(MD)No.26490 of 2025: *Challenge to the order dated 04.09.2025 passed by the TNPSC rejecting the petitioner's candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and cancelling her selection to the post of Deputy Collector.*

(i) The petitioner submitted that the impugned cancellation order has been passed solely on the basis of the communication dated 09.11.2023 issued by the University, which itself is under challenge in WP(MD)No. 23151 of 2024. It was further contended that the order had been passed without affording the petitioner an adequate opportunity to submit her explanation.

(ii) According to the petitioner, except for the allegation that the credit of the registration fee was not traceable in the University records, there is no material available against her. Consequently, the TNPSC has passed the



impugned order mechanically without independently satisfying itself regarding the genuineness of the petitioner's claim.

(iii) The petitioner further submitted that the University had issued her the admit card, hall tickets, course completion certificate, mark statements and degree certificate, the validity of which has never been disputed. Therefore, she cannot be made to suffer for the omission on the part of the recognised study centre, acting as an agent of the University, in remitting the registration fee to the Directorate of Distance Education.

(iv) Lastly, it was contended that the PSTM certificate merely certifies the medium of instruction pursued by the petitioner and is issued consequent upon the award of the degree. Since this Court has remitted the issue relating to cancellation of the petitioner's degree to the University for fresh consideration after obtaining her explanation, the degree continues to subsist. Consequently, the impugned order cancelling her selection is liable to be set aside.

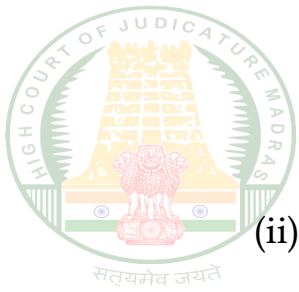


WP(MD)Nos.1266 of 2024, etc., batch

14.Kalaivani:-

(a) WP(MD)Nos.1266 and 6243 of 2024: *Challenge to the show cause notices dated 05.01.2024 and 23.01.2024 issued by the TNPSC calling upon the petitioner to explain as to why her candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and 2020, respectively, and her selection to the posts of Deputy Superintendent of Police (Category-I) and Deputy Collector should not be rejected.*

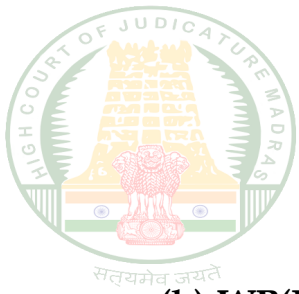
(i) The petitioner submitted that she had completed the B.Com. (Tamil Medium) course through the Directorate of Distance Education, Madurai Kamaraj University. She had secured admission through the recognised study centre, namely, AIECT Campus, Gudalur. According to the petitioner, her admission was processed in October 2015 and she had paid the registration fee of Rs.200/- to the study centre during the year 2015 itself. Therefore, if the study centre had remitted the registration fee to the University only on 09.03.2018, the petitioner cannot be held responsible for the same.



(ii) It was further submitted that the University had allotted an enrolment number to the petitioner and permitted her to appear for the examinations. Having accepted her admission and allowed her to complete the course, the University cannot subsequently contend that the admission was not in accordance with the prescribed norms.

(iii) The petitioner further contended that she had made several payments in connection with the course. If the University is unable to account for one particular transaction, the petitioner cannot be faulted for the same.

(iv) It was also contended that the Vigilance Department itself has alleged that certain officials of the University had indulged in corrupt practices and that the investigation in this regard is still in progress. Therefore, the issuance of the impugned show cause notices, even before the completion of the investigation, is premature and the TNPSC ought to have awaited the outcome of the investigation before initiating any action against the petitioner.



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(b) WP(MD)No.27149 of 2025: *Challenge to the order dated 09.09.2025 passed by the TNPSC rejecting the petitioner's candidature under the Combined Civil Services-I Examination (Group-I Services), 2020 and cancelling her selection to the post of Deputy Collector.*

(i) The petitioner submitted that she had made all the requisite payments through the recognised study centre and that the University had issued all the relevant certificates in her favour. Therefore, merely because certain payment records are not traceable in the University, she cannot be held responsible for the same.

(ii) It was further submitted that the University had failed to collect and maintain the records relating to students admitted through the distance education programme from the recognised study centres. The petitioner, having secured admission through an approved study centre, cannot be made to suffer for the lapses either on the part of the study centre or the University.



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(iii) Lastly, it was contended that the University had issued the petitioner the no due certificate and hall tickets enabling her to appear for the examinations. Having recognised her admission and permitted her to complete the course, the University cannot now turn around and contend that her admission itself was invalid.

15.K.C.Satish Kumar:-

(a) WP(MD)No.2011 of 2024: *Challenge to the show cause notice dated 05.01.2024 issued by the TNPSC calling upon the petitioner to explain as to why his candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and his selection to the post of Deputy Superintendent of Police (Category-I) should not be rejected.*

(i) The petitioner submitted that he had completed the B.A. History (Tamil Medium) course through the Directorate of Distance Education, Madurai Kamaraj University. On the strength of the PSTM certificate issued by the University, he applied under the PSTM category in the Combined Civil Services-I Examination (Group-I Services), 2016-19,

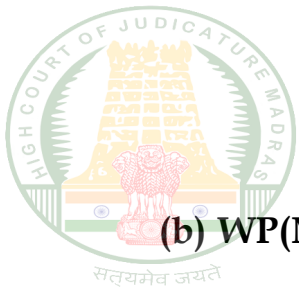


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successfully cleared the examination and was appointed as Deputy Superintendent of Police (Category-I).

(ii) It was further submitted that the impugned show cause notice had been issued mechanically solely on the basis of the communication dated 09.11.2023 received from the University stating that the petitioner's PSTM certificate was not valid. According to the petitioner, the University had issued the mark statements, provisional degree certificate and course completion certificate, all of which continue to remain valid. The petitioner had also paid the requisite fees through the recognised study centre and, therefore, cannot be penalised for the failure of the University to account for the same.

(iii) Lastly, it was contended that the impugned show cause notice was issued with a pre-determined mind and without affording the petitioner a reasonable opportunity to effectively put forth his explanation.



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(b) WP(MD)No.26701 of 2025: *Challenge to the order dated 04.09.2025 passed*

by the TNPSC rejecting the petitioner's candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and cancelling his selection to the post of Deputy Superintendent of Police (Category-I).

(i) The petitioner submitted that the impugned order had been passed without properly considering the explanation submitted by him and was merely the culmination of a pre-determined process initiated by the impugned show cause notice.

(ii) It was further submitted that the challenge to the show cause notice is pending before this Court and, without awaiting the outcome of the said proceedings, the TNPSC proceeded to pass the impugned order.

(iii) The petitioner further contended that he had produced the degree certificate, consolidated mark statement and year-wise mark statements issued by the University. Therefore, the TNPSC could not have ignored those records and concluded that the petitioner's PSTM certificate was invalid. According to the petitioner, the impugned order has been passed



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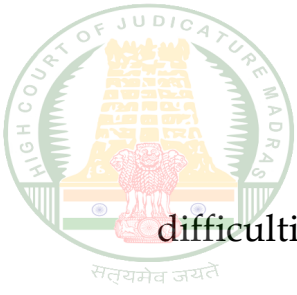
solely on the basis of the communication received from the University and the registration of the criminal case against him.

(iv) Lastly, it was contended that the non-availability of the records relating to the registration fee is attributable entirely to the University and the petitioner cannot be made to suffer for the failure of the University to account for the same.

16.Swapna:-

(a) WP(MD)No.1411 of 2024: *Challenge to the show cause notice dated 05.01.2024 issued by the TNPSC calling upon the petitioner to explain as to why her candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and her selection to the post of Assistant Commissioner (Commercial Taxes) should not be rejected.*

(i) The petitioner submitted that she had initially joined the B.C.A. course at P.K.N. Arts and Science College, Thirumangalam, and successfully completed the first year. According to the petitioner, on account of the hormonal changes that she was undergoing and the

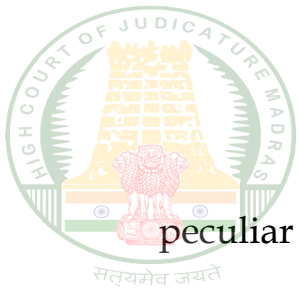


WP(MD)Nos.1266 of 2024, etc., batch

difficulties faced by her as a transgender person, she discontinued the course and joined Mannar Thirumalai Naicker College, where she completed the second year. Thereafter, she underwent sex reassignment surgery and joined the B.A. (Tamil) course through the Directorate of Distance Education, Madurai Kamaraj University.

(ii) It was further submitted that the officials of the University informed her that, since she had already completed the first and second years of the B.C.A. course in colleges affiliated to the University, she was eligible to join the final year of the B.A. (Tamil) course. Accordingly, she joined the final year and successfully cleared all the eighteen papers in a single sitting. The University also issued a communication dated 06.03.2014 clarifying that she had been admitted as a "III Year Readmission - Different Major". Therefore, the petitioner cannot be faulted for having pursued the course in the manner permitted by the University.

(iii) Lastly, it was contended that the impugned show cause notice had been issued mechanically and without taking into consideration the



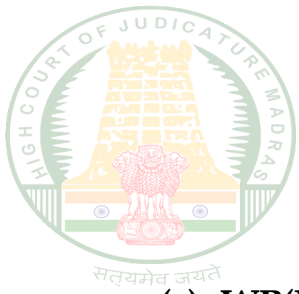
WP(MD)Nos.1266 of 2024, etc., batch

peculiar facts and circumstances under which the petitioner pursued her education, including the challenges faced by her as a transgender person.

(b) WP(MD)No.27437 of 2025: *Challenge to the order dated 04.09.2025 passed by the TNPSC rejecting the petitioner's candidature under the Combined Civil Services-I Examination (Group-I Services), 2016-19 and cancelling her provisional selection to the post of Assistant Commissioner (Commercial Taxes).*

(i) The petitioner submitted that the provisional selection had been cancelled solely on the basis of the communication dated 09.11.2023 issued by the University and the registration of the criminal case against her.

(ii) It was further submitted that the University had issued the petitioner the degree certificate, consolidated mark statement and year-wise mark statements, and it is not the case of the University that any of those documents were fabricated. Therefore, the TNPSC could not have ignored those records and concluded that the petitioner's PSTM certificate was invalid.



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(c) WP(MD)No.33810 of 2025: *Challenge to G.O.(D) No.360, Commercial Taxes and Registration (E1) Department, dated 14.11.2025, cancelling the petitioner's appointment as Assistant Commissioner (Commercial Taxes) and directing the Commissioner of Commercial Taxes to relieve her from the Tamil Nadu Commercial Taxes Service forthwith.*

(i) The petitioner submitted that this Court had granted an interim order staying the operation of the order of the TNPSC cancelling her provisional selection. Therefore, the consequential Government Order cancelling her appointment is unsustainable. It was further contended that the impugned order had been passed without affording her an opportunity of hearing and in violation of the principles of natural justice.

(d) WP(MD)No.13587 of 2025: *Challenge to G.O.(D) No.48, Commercial Taxes and Registration (E1) Department, dated 03.03.2025 placing the petitioner under suspension in public interest.*

(i) The petitioner submitted that the order of suspension had been passed solely on the basis of the registration of the criminal case against her

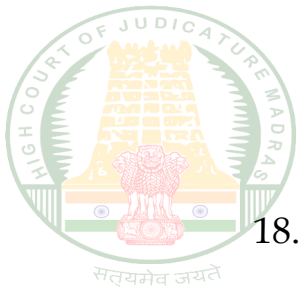


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and without any other justifiable cause. It was further contended that, since she intended to participate in the Group-I Examination pursuant to the Notification dated 01.04.2025, the continuance of the suspension would prevent her from obtaining the necessary No Objection Certificate from the Government.

TNPSC's stand:-

17.The TNPSC has taken a common stand in all these writ petitions. According to the Commission, pursuant to the directions issued by this Court in WP(MD)No.8025 of 2020 and Cont.P(MD)No.918 of 2021, the Deputy Superintendent of Police, Vigilance and Anti-Corruption, Madurai, conducted an investigation into the issuance of bogus PSTM certificates and requested the TNPSC to verify the genuineness of the certificates produced by the petitioners, who had been provisionally selected under the Combined Civil Services-I Examination (Group-I Services). Accordingly, the TNPSC called for verification reports from the concerned authorities, including the Madurai Kamaraj University.

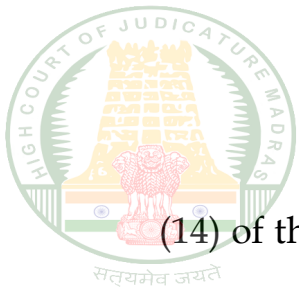


18. Based on the materials received, the Commission issued show cause notices to the petitioners and, after considering their explanations, rejected their applications and cancelled their provisional selection to the respective Group-I posts on the following grounds:

(i) The Madurai Kamaraj University, by its communication dated 09.11.2023, reported that the PSTM certificates produced by the petitioners were not valid. Further, the Vigilance and Anti-Corruption Department, Madurai, had registered Crime No.12 of 2024 against the petitioners and certain officials of the University in connection with the issuance of bogus PSTM certificates.

(ii) Subsequently, the Syndicate of the Madurai Kamaraj University also resolved to cancel the degrees issued to the petitioners.

(iii) In view of the above, the TNPSC concluded that the petitioners had applied under the PSTM quota without possessing valid PSTM certificates, thereby violating Clauses 12(L) and 13(h) of Notification No.1 of 2019 dated 01.01.2019 and Paragraphs 6(iv), 6(v), 19(b)(i), 20(d) and 22(I)



(14) of the Instructions to the Candidates. According to the Commission, by securing selection under the PSTM quota on the strength of invalid PSTM certificates, the petitioners had encroached upon the rights of other eligible candidates who had participated in the selection process.

MKU's stand:-

19.The common stand of the Madurai Kamaraj University in all these writ petitions is summarised as under:

(i) Pursuant to the orders of this Court in WP(MD)No.8025 of 2020 and Cont.P(MD)No.918 of 2021, the DSP, Vigilance and Anti-Corruption, Madurai, has found that the petitioners got appointed to Group-I services under the PSTM quota and requested the MKU to provide certain documents, registers and details regarding the petitioners. The University has cooperated with the investigation by the Vigilance Department and provided the required details.

(ii) The DSP, Vigilance and Anti-Corruption, Madurai requested the University to clarify regarding the genuineness of the certificates issued to



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the petitioners vide communication dated 17.10.2023. Pursuant to the same, the University has verified the admission details of the petitioners and has found that the alleged admission fees paid by the petitioners were not available in the University and vide communication dated 09.11.2023 has informed the Vigilance Department that the PSTM certificates issued in favour of the petitioners are not valid.

(iii) The University has accorded prior sanction for the registration of the criminal case against the University officials involved in the issue of bogus PSTM certificates on 06.09.2024.

(iv) The TNPSC has requested the University to furnish copies of the documents given to the Vigilance Department on 20.12.2024 and the University has furnished the same on 30.12.2024.

(v) The TNPSC has requested the University to confirm the genuineness of the certificates of the petitioners on 04.07.2025 and the University has informed the TNPSC on 08.07.2025 that the decision



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regarding the degrees awarded to the candidates has to be placed before the Syndicate and that a decision regarding the same would be taken soon.

(vi) Considering the seriousness of the issue, the Convener Committee of the University has appointed a four member committee for conducting a study regarding the validity of the admission and issuance of degree in respect of the above candidates. The four member committee has filed a detailed report on 06.10.2025 that the admission and PSTM certificates issued to one Chanheetha, K.C.Satish Kumar and Kalaivani is not valid as the registration fees paid by them to the University could not be validated.

(vii) There is no proof of payment of admission fees of the petitioners and all of them have obtained degrees by writing all the papers in a single sitting. There is no proof that they have undergone three years of study and they have obtained fraudulent certificates by colluding with certain University officials. Therefore, the matter was placed before the University Syndicate and the degrees of Chanheetha, K.C.Satish Kumar and Kalaivani



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were cancelled on 16.10.2025. Thereafter, the Vigilance Department has filed an objection report on 31.10.2025 with regard to one Swapna that she had joined her course in violation of University norms and her degree had to be cancelled. Pursuant to the above report, it was verified and the University Syndicate has resolved to cancel the degree of Swapna on 27.11.2025.

Vigilance Department's stand:-

20.The stand of the Vigilance Department, with regard to each petitioner is summarised as under.

21.Chanheetha:-

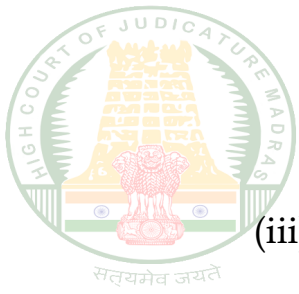
(i) According to the Individual Student Details, the petitioner was admitted on 30.06.2014 under Enrolment No.14CT500100388. The Vigilance Department states that the petitioner's photograph was not uploaded along with the application as required under the norms. It is further stated that the Registration Fee of Rs.200/-, said to have been remitted through Demand Draft No.0000032 dated 30.06.2014 drawn on HDFC Bank, is not



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reflected in the records of the Finance and Accounts Section of the Madurai Kamaraj University. The officials of HDFC Bank have also denied having issued the said Demand Draft. As per the Prospectus of the University, every application is required to be accompanied by the prescribed Registration Fee and any application received without such fee is liable to be rejected. The Vigilance Department, therefore, contends that the petitioner's application itself was invalid.

(ii) The Vigilance Department further states that, as per the Individual Student Details, the petitioner was admitted through the Life Educational Trust Study Centre, Theni, on 30.06.2014 and was assigned Application No. 20553. However, according to the Applications Issue Register for the academic year 2013-2014, the said application had already been despatched to the Kalra Institute of Academic Technology and Management, Gurgaon. Reliance is also placed on the statement of one Velankanni, Deputy Registrar, General Section, Madurai Kamaraj University, who has stated that the application was sent to the said institution on 30.10.2013 based on the request made by the Study Centre on 23.10.2013.



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(iii) According to the Tabulated Marks Register, the petitioner had originally been admitted to the English Medium course and not the Tamil Medium course. The Vigilance Department states that the petitioner sought and obtained a change of medium only on 05.05.2017, at the end of the third year of the course, after appearing for the November 2016 examinations. It is contended that, under the Prospectus of the University, a request for change of medium ought to have been made within three months from the date of admission or at least one month prior to the closure of the relevant Academic/Calendar Year admission. Therefore, according to the Vigilance Department, the change of medium was effected contrary to the prescribed norms of the University.

(iv) The Vigilance Department also relies upon the Tabulated Marks Register to state that certain corrections were subsequently made in the petitioner's Marks Statement. While the Marks Statement originally issued showed that the petitioner had remained absent in three subjects, those entries were later altered to indicate that she had appeared for the examinations.



WEB COPY (v) It is further stated that the petitioner passed all eighteen papers in a single sitting in the November 2016 examinations conducted during the third year of the course and was issued a Degree Certificate on that basis. According to the Vigilance Department, neither the petitioner's examination application nor the answer scripts relating to the eighteen papers are available with the University.

(vi) In response to the allegation regarding payment of the Registration Fee, the petitioner has stated that she paid a sum of Rs.200/- in cash to the Life Educational Trust Study Centre and that the Study Centre, in turn, obtained the Demand Draft and remitted the amount to the University. The Vigilance Department, however, points out that the petitioner has neither disclosed the identity of the person to whom the payment was made nor produced any receipt evidencing such payment. It is also stated that one Murali, Manager of the Study Centre, has given a statement that Demand Draft No.0000032 had been received only from the petitioner.



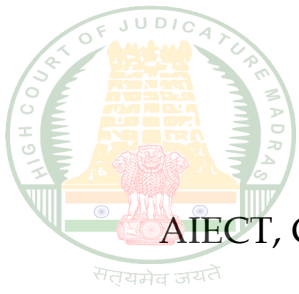
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22.Kalaivani:-

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(i) According to the Admission Card details, the petitioner was admitted under Registration No.16AT501800495 and is shown to have paid the Registration Fee of Rs.200/- on 31.12.2015 through Bank ID No. 85994778 of the State Bank of India, Palkalai Nagar Branch, Madurai. The Vigilance Department, however, states that the said Registration Fee was actually credited to the account of the Directorate of Distance Education, Madurai Kamaraj University, only on 09.03.2018. It is further stated that the aforesaid Bank ID came into use only during the year 2018. Therefore, according to the Vigilance Department, the entry in the Admission Card showing payment of the Registration Fee in the year 2015 is false. As per the Prospectus of the University, every application is required to be accompanied by the prescribed Registration Fee and any application received without such fee is liable to be rejected. The Vigilance Department, therefore, contends that the petitioner's application itself was invalid.

(ii) The Vigilance Department further states that, according to the Individual Student Details, the petitioner secured admission through



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AIECT, Gudalur. During the course of investigation, however, it was found that the admission and tuition fees had actually been remitted through the Sethupathi Institute of Higher Education, Coimbatore, which had commenced functioning only on 18.12.2017. It is further stated that the petitioner's Application No.00235 had already been despatched to the Computer Training Centre, Amity Career Institute, Tambaram, Chennai, on 22.07.2013 as reflected in the Applications Issued Register for the academic year 2013–2014. According to the Vigilance Department, the very same application was subsequently used to project as if the petitioner had secured admission through AIECT, Gudalur, on 31.12.2015. It is, therefore, alleged that the application number was utilised in violation of the norms of the University.

(iii) It is further stated that the petitioner cleared all seventeen papers in a single sitting in the April 2018 examinations and was issued the Degree Certificate and the PSTM Certificate on that basis.



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WEB COPY (iv) The Vigilance Department also states that the PSTM Certificate produced by the petitioner before the TNPSC during certificate verification, bearing the date 24.04.2019, differs from the PSTM Certificate issued by the University on 29.07.2019. According to the University, the PSTM Certificate produced by the petitioner before the TNPSC is a bogus certificate. It is further stated that neither the petitioner's examination application nor the answer scripts relating to the seventeen papers are available with the University. The Vigilance Department also points out that, during the course of investigation, the petitioner was unable to produce the PSTM Certificate which she had relied upon during the TNPSC certificate verification.

(v) The petitioner was examined on 22.08.2022 and, according to the Vigilance Department, she gave a signed statement stating that she had joined the B.Com. (Tamil Medium) course through the Sethupathi Institute of Higher Studies, Coimbatore, and had passed all seventeen papers in a single sitting in the year 2018. The Vigilance Department, however, states



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that the petitioner has subsequently contradicted the said statement and has now taken a stand that she studied the B.Com. (Tamil Medium) course through AIECT Campus, Gudalur, after paying a fee of Rs.4,800/- to the said institution. She has also stated that she appeared for the examinations after obtaining Hall Tickets through the Sethupathi Institute of Higher Studies, Coimbatore, in the year 2018.

23.K.C.Satish Kumar:-

(i) According to the Admission Card, the petitioner was admitted under Registration No.16AT500100562. The records contain entries indicating that the Registration Fee of Rs.200/- was paid through Demand Draft No.878796 on 31.12.2015 and that the tuition fee of Rs.5,200/- was remitted through Demand Draft No.93231970 on 09.07.2019 in the Finance and Accounts Section of the Directorate of Distance Education, Madurai Kamaraj University. The Vigilance Department, however, states that no such amounts were actually credited to the Finance and Accounts Section. As per the Prospectus of the University, every application is required to be accompanied by the prescribed Registration Fee and any application



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received without such fee is liable to be rejected. The Vigilance Department, therefore, contends that the petitioner's application itself was invalid.

(ii) The Vigilance Department further states that, according to the Admission Register and the Applications Issued Registers, the petitioner secured admission through Tirunelveli Jayam Institute on 31.12.2015. However, according to the statement of one Ramesh Babu, who runs the said Study Centre, the petitioner was never admitted through his Study Centre and had not appeared for any examination through the same. It is further stated that Application No.00562, which had been despatched to Annai Educational Trust, Saligramam, Chennai, on 23.07.2013 as reflected in the Delivery Slip Book and Gate Pass, was subsequently utilised for the petitioner's admission. According to the Vigilance Department, the claim that the petitioner secured admission through the said Study Centre is therefore false.

(iii) The Vigilance Department also relies upon the statement of one Manikandan, who runs the ChelJan Study Centre, to state that the

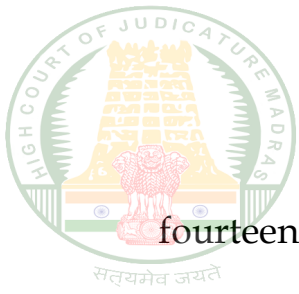


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petitioner was never admitted through his Study Centre and had not appeared for the examinations as reflected in the Individual Student Details (Admission Card). He has also stated that he had not remitted any amount to the University on behalf of the petitioner. The Vigilance Department further relies upon the statement of one Pandidurai, a friend of the petitioner, who is stated to have admitted that he had handed over the petitioner's application to one Jeyapandi, a temporary staff member of the Madurai Kamaraj University, who processed the petitioner's application.

(iv) It is further stated that corrections were made in the petitioner's Tabulated Marks Register by the Superintendent of Examinations, following which the Consolidated Mark Statement and the Provisional Certificate were issued to the petitioner.

(v) The Vigilance Department further states that the petitioner appeared for all eighteen papers in a single sitting during the third year examinations held in April 2018 and cleared the same. It is also stated that the petitioner's examination application, the answer scripts relating to



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fourteen subjects and the records pertaining to the issuance of the Provisional Certificate are not available with the University.

24.Swapna:-

(i) According to the Admission Card, the petitioner secured admission on 20.06.2012 under Registration No.12AT4090187. The Admission Card contains entries showing that a sum of Rs.100/- was paid towards the Registration Fee vide Cash Receipt No.9329 dated 26.04.2012 and that the tuition fee of Rs.1,650/- was remitted through the SBI Power Jyoti Account on 04.08.2012. The Vigilance Department, however, states that no record relating to the payment of the Registration Fee is available in the Finance and Accounts Section of the Directorate of Distance Education, Madurai Kamaraj University. As per the Prospectus of the University, every application is required to be accompanied by the prescribed Registration Fee and any application received without such fee is liable to be rejected. The Vigilance Department, therefore, contends that the petitioner's application itself was invalid.



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(ii) The Vigilance Department further states that the petitioner had completed the first year of the B.C.A. (English Medium) course at PKN Arts and Science College, Thirumangalam, and the second year at Mannar Thirumalai Naicker College, Madurai. Thereafter, she was granted exemption by the Madurai Kamaraj University and admitted directly into the third year of the B.A. (Tamil) course. According to the Vigilance Department, Paragraph 14 of the Prospectus of the University permits only those candidates who had discontinued their studies in the first, second or third year of the B.C.A. course to seek admission into the first year of the same degree course. It is, therefore, alleged that the exemption granted to the petitioner to secure direct admission into the third year of the B.A. (Tamil) course was contrary to the norms of the University. It is further stated that, while the petitioner claims to have secured admission on 20.06.2012, the order granting exemption was issued only on 14.08.2012, that is, after the date of admission, which is also stated to be contrary to the University norms.



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(iii) The Vigilance Department also states that the petitioner secured admission on 20.06.2012 using Application No.37235. Whereas, on verification of the Centre records, it is found that Application No.37235 was dispatched to the Admission Centre (Headquarters), Palkalai Nagar, Madurai, only on 13.06.2014 (i.e.) 2 years after the admission of the petitioner.

(iv) It is further stated that the petitioner passed all eighteen papers in a single sitting in the November 2012 examinations, within six months of securing admission to the course.

(v) According to the Vigilance Department, out of the eighteen foil cards relating to the petitioner, only fourteen were available with the University. It is further stated that the records relating to the issuance of the Provisional Certificate, Course Completion Certificate and the registers pertaining to the issuance of the Provisional Certificate and the PSTM Certificate are not available with the Directorate of Distance Education.

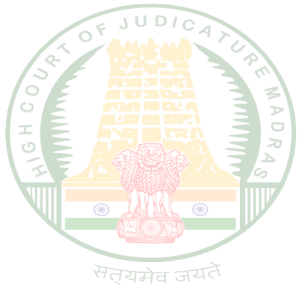


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According to the Vigilance Department, there are therefore no records available to establish the issuance of the said certificates.

(vi) The Vigilance Department further states that the PSTM Certificate produced by the petitioner during the TNPSC certificate verification records that she studied the B.A. (Tamil) course during the calendar period from January 2010 to December 2012. However, the petitioner had actually pursued the course only for a period of about six months, namely from 20.06.2012 till November 2012. It is, therefore, alleged that the particulars furnished in the PSTM Certificate are incorrect.

25. Insofar as WP(MD)No.13587 of 2025, filed by Swapna challenging the order of suspension dated 03.03.2025, is concerned, the Commercial Taxes and Registration Department and the Commissioner of Commercial Taxes have taken a common stand that, in view of the registration of Crime No.12 of 2024 against the petitioner and the serious allegations that she had secured public employment on the strength of a bogus PSTM Certificate, it was considered necessary, in public interest, to place her under suspension.



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26. Insofar as WP(MD)No.33810 of 2025, filed by Swapna challenging the cancellation of her appointment dated 14.11.2025 is concerned, the Commercial Taxes and Registration Department and the Commissioner of Commercial Taxes have taken a common stand that, it is only a consequential order to the cancellation of the provisional selection of the petitioner by the TNPSC.

27. This Court considered the rival submissions made by the respective parties and perused the materials placed on record.

28. All the writ petitioners were provisionally selected by the Tamil Nadu Public Service Commission for appointment to Group-I Services under the Persons Studied in Tamil Medium quota pursuant to Notification No.1 of 2019 dated 01.01.2019. Under the said recruitment, 181 vacancies were notified, of which 34 vacancies were earmarked for candidates claiming reservation under the PSTM quota. Apart from the said recruitment, Kalaivani was also provisionally selected under the PSTM

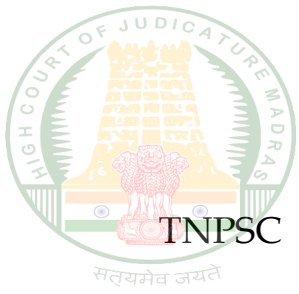


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quota in the Group-I Recruitment Examination, 2020. At present, Chanheetha and Kalaivani are serving as Deputy Collectors, while K.C.Satish Kumar and Swapna are serving as Assistant Commissioners (Commercial Taxes).

29.This Court had earlier granted interim orders staying the operation of the orders passed by the TNPSC cancelling the provisional selection of the petitioners. The interim protection was granted principally on the ground that the degrees conferred upon the petitioners by the Madurai Kamaraj University had not been cancelled and that the impugned orders of the TNPSC did not disclose any independent reason for concluding that the petitioners had not completed their respective courses in Tamil Medium.

30.The petitioners had earlier filed WP(MD)Nos.1411 of 2024 (Swapna), 2011 of 2024 (K.C.Satish Kumar), 2805 of 2024 (Chanheetha), and 1266 and 6243 of 2024 (Kalaivani) challenging the show cause notices issued by the TNPSC. During the pendency of the said writ petitions, the



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TNPSC passed final orders cancelling the provisional selection of the petitioners. Those final orders are now under challenge in WP(MD)Nos. 27437 of 2025 (Swapna), 2670 of 2025 (K.C.Satish Kumar), 26490 of 2025 (Chanheetha) and 27149 of 2025 (Kalaivani). Consequently, the writ petitions challenging the show cause notices have become infructuous. Apart from the above, it is well settled that ordinarily no writ petition lies against a show cause notice or charge memorandum, since the same does not by itself affect any legal right or give rise to a cause of action. The decision of the Hon'ble Supreme Court in *Union of India v. Kunisetty Satyanarayana* [(2006) 12 SCC 28], reiterates the said principle. Therefore, the writ petitions challenging the show cause notices are liable to be dismissed as not maintainable. As such, the principal question that survives for consideration is the validity of the final orders passed by the TNPSC cancelling the provisional selection of the petitioners.

31.Before examining the rival contentions, it is necessary to bear in mind the scope of judicial review in the present batch of cases. This Court is not called upon to determine the criminal culpability of the petitioners or to

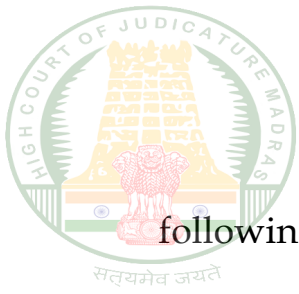


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record findings regarding the offences alleged in Crime No.12 of 2024.

Those issues fall within the domain of the investigating agency and the competent criminal Court. The question that arises for consideration is considerably narrower, namely, whether the respondents possessed sufficient objective material to conclude that the petitioners were not entitled to continue claiming the benefit of reservation under the PSTM quota and whether the consequential administrative action suffers from arbitrariness, perversity or violation of law.

32.Pursuant to the directions issued by this Court in WP(MD)No.8025 of 2020 and Cont.P(MD) No.918 of 2021, the Vigilance and Anti-Corruption Department conducted a detailed investigation into the genuineness of the PSTM Certificates produced by candidates selected under the PSTM quota. According to the Vigilance Department, the investigation disclosed several irregularities relating to the admission of the petitioners, the course of study pursued by them and the issuance of the PSTM Certificates relied upon by them. Though the specific allegations differ from petitioner to petitioner, the materials collected during the investigation disclose the



following common features:

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(1) All the petitioners obtained their degrees through the Directorate of Distance Education, Madurai Kamaraj University, by enrolling through different Study Centres. However, in each case, discrepancies have been noticed between the Study Centre to which the application was originally despatched by the University and the Study Centre through which the petitioner is stated to have secured admission.

(2) All the petitioners cleared all the papers relating to their respective degree courses in a single sitting during the final year of study.

(3) The records maintained by the Finance and Accounts Section of the University do not disclose payment of the Registration Fee at the time of admission. Further, in several cases, the applications, answer scripts and other relevant academic records are stated to be unavailable with the University.

(4) According to the Vigilance Department, though the Registration Fee ought to have been paid at the time of admission,



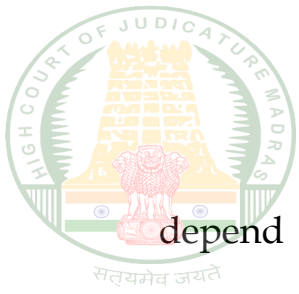
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the records indicate that the amount was actually remitted only during the final year of study. At the same time, entries have been made in the Admission Cards showing as though the Registration Fee had been paid on the last day of the calendar year in which admission was secured.

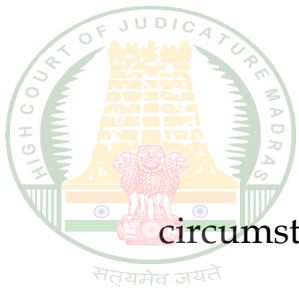
These are not isolated irregularities. Rather, they constitute interconnected circumstances touching the very foundation of the petitioners' admission, course of study and issuance of the PSTM Certificates.

33. None of the above circumstances, viewed individually, may by itself conclude the issue. However, administrative authorities are not required to examine each circumstance in isolation. When viewed cumulatively, the materials disclose a consistent pattern casting serious doubt upon the genuineness of the petitioners' admission, course of study and the consequential issuance of the PSTM Certificates. At this stage, this Court is not concerned with recording any finding on the criminal culpability of the petitioners or on the correctness of each allegation made by the Vigilance Department. Those are matters which would necessarily



depend upon the outcome of the investigation and any proceedings that may follow. The limited question before this Court is whether the respondents possessed sufficient objective material to initiate the impugned administrative action. In the considered view of this Court, the materials placed on record satisfy that requirement.

34.The principal contention advanced on behalf of all the petitioners is that they had paid the prescribed fees to their respective Study Centres and that, if the Study Centres failed to remit the same to the University, the petitioners cannot be penalised. This submission cannot be accepted in the facts of the present case. The allegation against the petitioners is not confined merely to non-reflection of the registration fee in the accounts of the University. The materials collected during investigation disclose several other serious discrepancies, including recycled application numbers, inconsistencies regarding the Study Centres through which admissions were obtained, doubtful demand drafts, contradictory admission records, unavailable examination records, missing answer scripts and, in certain cases, alteration of academic records. It is the cumulative effect of these



circumstances, and not the isolated issue relating to payment of fees, that has led the respondents to question the genuineness of the PSTM certificates.

35.The petitioners have also repeatedly relied upon the fact that the University itself issued hall tickets, mark statements, course completion certificates, provisional certificates and degree certificates in their favour. However, the mere issuance of those documents cannot, by itself, conclude the issue once the University itself has, on verification of its records, questioned the validity of the very process by which those certificates came to be issued. In the present case, the challenge is not to the physical existence of those certificates, but to the legality and genuineness of the process that culminated in their issuance.

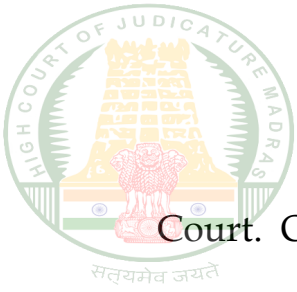
36.It is also relevant to note that this Court had granted interim protection at an earlier stage principally because the degrees conferred upon the petitioners had not then been cancelled by the Madurai Kamaraj University. Consequently, the petitioners have continued in service



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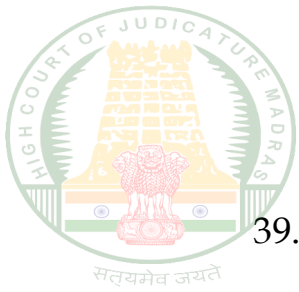
pursuant to the interim orders passed by this Court. However, during the pendency of these writ petitions, the Madurai Kamaraj University cancelled the degrees issued in favour of Chanheetha, Kalaivani and K.C.Satish Kumar on 16.10.2025 and Swapna on 27.11.2025. Those orders were subsequently set aside by this Court in WP(MD)Nos.32126 of 2025 (Chanheetha), 32860 of 2025 (Kalaivani), 33121 of 2025 (Satish Kumar) and 36348 of 2025 (Swapna) solely on the ground that they had been passed without affording the petitioners an opportunity of hearing and the matters were remitted for fresh consideration. The subsequent developments have, therefore, materially altered the basis upon which the interim orders had earlier been granted.

37.It is to be noted that the petitioners cannot derive any advantage from the said order of remand. The aforesaid orders were confined to the procedural infirmity arising from the denial of an opportunity of hearing, and the merits of the allegations were expressly left open. In the present batch of writ petitions, the petitioners have been afforded adequate opportunity to place all their factual and legal submissions before this

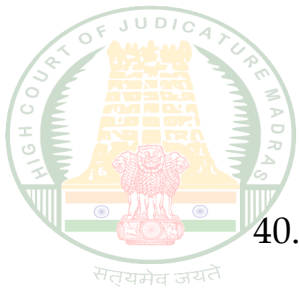


Court. Once all the factual and legal submissions which the petitioners contend ought to have been considered by the University have been placed before this Court and examined on merits, no useful purpose would be served by interfering solely on the earlier procedural infirmity.

38.The contention that the respondents ought to have deferred all action until the completion of the criminal investigation is equally without merit. Criminal proceedings and administrative action operate in distinct fields. The pendency of one does not preclude the other from proceeding independently. While criminal prosecution is intended to determine criminal liability beyond reasonable doubt, the authorities responsible for public employment are entitled to independently examine whether the eligibility conditions governing public appointment continue to stand satisfied. The mere pendency of the criminal proceedings therefore did not prevent the TNPSC from examining the validity of the petitioners' claim under the PSTM quota.



39. In this backdrop, the legality of the final orders passed by the TNPSC cancelling the provisional selection of the petitioners falls for consideration. The petitioners secured provisional selection under the PSTM quota solely on the strength of the PSTM Certificates issued by the Madurai Kamaraj University. The very University which issued those certificates has subsequently informed the TNPSC that the certificates are not genuine. That communication is also supported by the materials collected by the Vigilance Department during the course of investigation, which disclose several irregularities relating to the admission, course of study and issuance of the certificates relied upon by the petitioners. In such circumstances, the TNPSC cannot be faulted for examining the eligibility of the petitioners to continue to claim the benefit of reservation under the PSTM quota. In fact, once the very authority which issued the PSTM certificates expressed serious reservations regarding their genuineness, supported by the materials gathered during the Vigilance investigation, the Commission would have failed to discharge its obligation to verify the petitioners' eligibility had it failed to take those developments into account.



40. The selection of the petitioners was admittedly provisional. A candidate claiming reservation necessarily carries the burden of establishing continued eligibility to claim such reservation. Since the selection was only provisional, the Commission retained the authority to verify the petitioners' eligibility even after selection. The Notification dated 01.01.2019 issued by the TNPSC specifically provides that candidature is liable to be rejected if, at any stage, it is found that any claim made by a candidate regarding eligibility, educational qualification or entitlement to reservation is incorrect. The relevant portion is extracted hereunder:

"12. General Informations

... ..

L. Incomplete applications and applications containing wrong / incorrect claims or incorrect particulars relating to category of reservation / other basic qualification / eligibility wise / age / communal categories / educational qualification / PSTM / physical qualification and other basic eligibility criteria will be summarily rejected.

... ..

13. Other Important Instructions

... ..

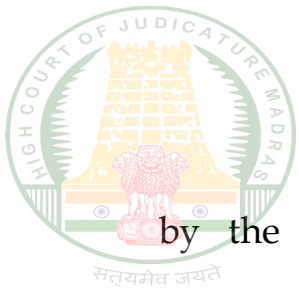
g) Unless specific instruction is given, applicants are not



required to submit along with their application any certificates (in support of their claims regarding age, educational qualifications, physical qualification, community certificate and certificates regarding their physical disability etc.,) which should be submitted when called for by the Tamil Nadu Public Service Commission. The applicants applying for the examination should ensure that they fulfil all the eligibility conditions for admission to the Examination. Their admission at all the stages of examination for which they are admitted by the Commission viz. Preliminary Examination, Main Written Examination, Certificate Verification and Oral Test will be purely provisional, subject to their satisfying the prescribed eligibility conditions. If, on verification at any time before or after Preliminary Examination, Main Written Examination, Certificate Verification and Oral Test, it is found that they do not fulfill any of the eligibility conditions, their candidature for the recruitment will be rejected summarily by the Commission.

h) If any of their claims is found to be incorrect, it will lead to rejection of their candidature and suitable penal action including debarment."

Therefore, once credible materials were placed before the TNPSC casting serious doubt upon the genuineness of the PSTM Certificates relied upon



by the petitioners, the Commission was fully justified in initiating proceedings and passing appropriate orders after following the prescribed procedure.

41.Although this Court is not recording any final finding regarding fraud in the criminal law sense, it is nevertheless necessary to bear in mind the well-settled principle *Fraus et jus nunquam cohabitant* (fraud and justice never dwell together). The law does not permit a person to retain an advantage obtained by practising fraud or misrepresentation. In ***Union of India v. Prohlad Gupta* [2024 SCC OnLine SC 1865]**, the Hon'ble Supreme Court reiterated that fraud vitiates every solemn act and that a person who secures public employment by practising fraud cannot seek protection of the law to retain such appointment, in the following terms:-

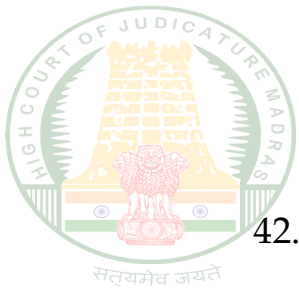
"14.The above discussion reiterates that fraud vitiates all proceedings. Compassionate appointment is granted to those persons whose families are left deeply troubled or destitute by the primary breadwinner either having been incapacitated or having passed away. So when persons seeking appointment on such ground attempt to falsely establish their eligibility, as has been done in this case, such positions



cannot be allowed to be retained. So far as the submission of non-compliance of the Rules is concerned, the judgment in Vishwanatha Pillai (supra) answers the question. The respondent-employees in the present case, having obtained their position by fraud, would not be considered to be holding a post for the purpose of the protections under the Constitution. We are supported in this conclusion by the observations made in Devendra Kumar v. State of Uttaranchal. In paragraph 25 thereof it was observed –

“25. More so, if the initial action is not in consonance with law, the subsequent conduct of a party cannot sanctify the same. Sublato fundamento cadit opus – a foundation being removed, the superstructure falls. A person having done wrong cannot take advantage of his own wrong and plead bar of any law to frustrate the lawful trial by a competent court. In such a case the legal maxim nullus commodum capere potest de injuria sua propria applies. The persons violating the law cannot be permitted to urge that their offence cannot be subjected to inquiry, trial or investigation. (Vide Union of India v. Major General Madan Lal Yadav [(1996) 4 SCC 127 : 1996 SCC (Cri) 592 : AIR 1996 SC 1340] and Lily Thomas v. Union of India [(2000) 6 SCC 224 : 2000 SCC (Cri) 1056].) Nor can a person claim any right arising out of his own wrongdoing (jus ex injuria non oritur).

(Emphasis supplied)”



42.In *Food Corporation of India v. Jagdish Balaram Bahira* [(2017) 8

SCC 670], the Hon'ble Supreme Court held that permitting an ineligible person to secure public employment not only deprives a genuinely eligible candidate of an opportunity but also strikes at the constitutional guarantee of equality in public employment. The Hon'ble Supreme Court further emphasised that Courts must ensure that their jurisdiction is not utilised to perpetuate an illegality or protect benefits obtained by practising fraud.

"56. Service under the Union and the States, or for that matter under the instrumentalities of the State subserves a public purpose. These services are instruments of governance. Where the State embarks upon public employment, it is under the mandate of Articles 14 and 16 to follow the principle of equal opportunity. Affirmative action in our Constitution is part of the quest for substantive equality. Available resources and the opportunities provided in the form of public employment are in contemporary times short of demands and needs. Hence, the procedure for selection, and the prescription of eligibility criteria has a significant public element in enabling the State to make a choice amongst competing claims. The selection of ineligible persons is a manifestation of a systemic failure and has a deleterious effect on good governance. Firstly, selection of a person who is not eligible allows someone who is ineligible to gain access to



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scarce public resources. Secondly, the rights of eligible persons are violated since a person who is not eligible for the post is selected. Thirdly, an illegality is perpetrated by bestowing benefits upon an imposter undeservingly. These effects upon good governance find a similar echo when a person who does not belong to a reserved category passes off as a member of that category and obtains admission to an educational institution. Those for whom the Constitution has made special provisions are as a result ousted when an imposter who does not belong to a reserved category is selected. The fraud on the Constitution precisely lies in this. Such a consequence must be avoided and stringent steps be taken by the Court to ensure that unjust claims of imposters are not protected in the exercise of the jurisdiction under Article 142. The nation cannot live on a lie. Courts play a vital institutional role in preserving the rule of law. The judicial process should not be allowed to be utilised to protect the unscrupulous and to preserve the benefits which have accrued to an imposter on the specious plea of equity. ...”

43. For the aforesaid reasons, this Court finds no arbitrariness, perversity or illegality in the decision of TNPSC in rejecting the petitioners' candidatures and cancelling their provisional selection. As such, WP(MD)Nos.2670, 26490, 27149 & 27437 of 2025 are liable to be dismissed.

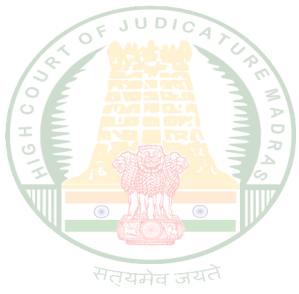


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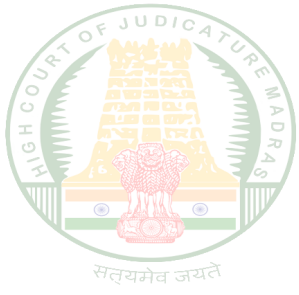
44.This Court is also not inclined to interfere with the communication dated 09.11.2023 issued by the Madurai Kamaraj University informing the Deputy Superintendent of Police, Vigilance and Anti-Corruption, Madurai, that the PSTM Certificates relied upon by the petitioners are not genuine. The said communication only constitutes one of the materials relied upon by the authorities and does not, by itself, determine the rights of the petitioner. Consequently, WP(MD)No.23151 of 2024 is liable to be dismissed.

45.For the very same reasons, this Court finds no ground to interfere with G.O(D)No.48, Commercial Taxes and Registration (E1) Department dated 03.03.2025 placing Swapna under suspension. Having regard to the registration of the criminal case and the serious allegations touching the very basis of her appointment to public service, the order of suspension cannot be said to be arbitrary or illegal. Accordingly, WP(MD)No.13587 of 2025 also deserves to be dismissed.



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46. This Court cannot also lose sight of the nature of the posts presently held by the petitioners. They occupy responsible positions in the civil services, where the discharge of public duties demands the highest standards of integrity, transparency and ethical conduct. The legitimacy of public administration rests upon the confidence of the public that appointments to public office are made strictly in accordance with law and not by resorting to fraud or manipulation. Where the very foundation of an appointment stands seriously questioned on credible materials and the authorities possess substantial material warranting further action, this Court would be failing in its constitutional duty if it were to exercise its extraordinary jurisdiction under Article 226 of the Constitution to protect such appointments. As held by the Hon'ble Supreme Court, the judicial process cannot be permitted to protect or perpetuate an appointment obtained on the strength of certificates whose genuineness stands seriously questioned.



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In the result, all the writ petitions stand dismissed. The interim orders already granted stand vacated and all the connected miscellaneous petitions are closed. There shall be no order as to costs.

Internet : Yes

29.06.2026

Index : Yes / No

NCC : Yes / No

gk

To

1.The Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road, Park Town,
Chennai - 600 003.

2.The Registrar,
Madurai Kamaraj University,
Madurai - 625 021.

3.The Deputy Superintendent of Police,
Vigilance and Anti Corruption,
1/165G, Alagar Kovil Road,
Madurai - 625 002.

4.The Secretary to Government,
State of Tamil Nadu,
Commercial Taxes and Registration Department,
Secretariat, St.George Fort,
Chennai.

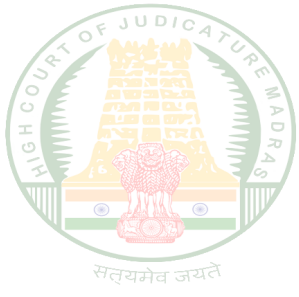


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5.The Commissioner of Commercial Tax,
Chennai – 5.

6.The Joint Commissioner (ST),
Madurai Division,
Madurai.

7.The Deputy Secretary,
Tamil Nadu Public Service Commission,
TNPSC Road, VOC Nagar,
Park Town,
Chennai – 600 003.



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B.PUGALENDHI, J.

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**WP(MD)Nos.1266, 1411, 2011, 2805, 6243, 23151 of 2024;
13587, 26490, 26701, 27149, 27437, 33810 of 2025**

29.06.2026