

CHARGE SHEET

(Under Section 173 Cr.P.C)

IN THE COURT OF SPECIAL JUDGE, NIA, GUWAHATI

1	Name of the Investigation Agency	National Investigation Agency (NIA).
	FIR No and date	RC-01/2011/NIA-GUW dt 11.07.2011
2	Final Report/Charge Sheet No.	01/ 2012.
3	Date	
4	Sections of Law	120(B), 121(A) IPC & Sections 18, 18A, 20 & 39 of UA(P) Act 1967
5	Type of Final Report	Charge sheet.
6	If Final Report Un-occurred/ false/ Mistake of fact/Mistake of law/Non-Cognizable /Civil Nature	Not Applicable.
7	If Charge-sheeted: Original / Supplementary	Original.
8	Name of Investigation Officer	Aseem Srivastava, ASP/NIA
9	Name of the Complainant/ Informant	Aseem Srivastava ASP/NIA
10	Details of Properties /Articles/ Documents recovered/seized during the investigation and relied upon:	As per Annexure "A", "B", "B-1"& C enclosed.

(11) (1) Particulars of accused persons charge sheeted:

Name : N.Dilip Singh @ Wangba @ N. Ranjit @ Jana
(hereinafter referred as A-1)

Whether verified : Yes

Father's Name : Late N.Iboton Singh

Year/Date of Birth : 1962

Sex : Male

Nationality : Indian

Passport No. : NA

Place of issue : NA

Date of issue : NA

Religion : Hindu

Occupation : Member of PLA

Address (Present) : House No. 18, Bye Lane-12,
Kundil Nagar Path, near Rajgarh Road, Guwahati,
Assam

Address (Permanent) : Konjeng Leikai PS Singjamei, Imphal West,
Manipur

Whether verified : Yes

Provisional Criminal No. : NA

Regular Criminal No. (if known) : NA

Date of Arrest : 28.11.2011

Date of release on bail : NIL

Under Acts & Sections (of charge sheet) : 120(B), 121(A) of IPC & Sections 18, 18A, 20 & 39 of UA(P) Act 1967as amended.

Name(s) of bailer/sureties and address : NA

Previous convictions with case reference : NA

Status of the accused : In Judicial Custody

(2) Particulars of accused persons charge sheeted:

Name : Senjam Dhiren Singh @ S. Babu Singh @ S. Babu Singha @ Macha @ Dhiren Singha @ Raghu
(hereinafter referred as A-2)

Whether verified : Yes

Father's Name : s/o Late S. Biren Singh @ S. Niren Singh

Year/Date of Birth : 01.01.1973

Sex : Male

Nationality : Indian

Passport No. : NA

Place of issue : NA

Date of issue : NA

Religion : Hindu

Occupation : Member of PLA

Address (Present) : E-41 Poddarnagar, PS Jadavpur, Kolkata

Address (Permanent) : Village- Bahadurgram, PO- Gossainpur, PS Udharband, Distt. Cachar, Assam

Whether verified : Yes

Provisional Criminal No. : NA

Regular Criminal No. : NA

Date of Arrest : 07.03.2012

Date of release on bail : NIL

Under Acts & Sections : 120(B), 121(A) of IPC & Sections 18, 18A, 20 & (of charge sheet) 39 of UA (P) Act 1967 as amended.

Name(s) of : NA
bailer/sureties and
address

Previous convictions : NA

with case reference

Status of the accused : In Judicial Custody

(3) Particulars of accused persons charge sheeted:

Name : Arnold Singh @ Kh Arnold Singh @ Arnold Singha@ Becon
(herein after referred as A-3)

Whether verified : Yes

Father's Name : Sushil Kumar Singh

Year/Date of Birth : 1981

Sex : Male

Nationality : Indian

Passport No. : NA

Place of issue : NA

Date of issue : NA

Religion : Hindu

Occupation : Member of PLA

Address (Present) : House No 23, Manipuri Basti, Guwahati, Assam

Address (Permanent) : House No 23, Manipuri Basti, Guwahati, Assam

Whether verified : Yes

Provisional Criminal No. : NA

Regular Criminal No. : NA
(if known)

Date of Arrest : 02.04.2012

Date of release on bail : NIL

Under Acts & Sections (of charge) : 120(B), 121(A) of IPC & Sections 18, 18A, 20 & 39 of UA (P) Act 1967 as amended.

sheet)

Name(s) of : NA
bailer/sureties and
address

Previous convictions : NA
with case reference

Status of the accused : In Judicial Custody

(12) Particulars of accused persons - not charge-sheeted.

- NIL**
- (13) (i) Particulars of witnesses to be examined : As per the list enclosed as Annexure –‘A’
(ii) List of documents/emails :As per the list enclosed as Annexure-‘B’ & ‘B-1’
(iii) List/details of articles : As per the list enclosed as Annexure-‘C’

(14) If FIR is false, indicate action taken or proposed to be taken u/s 182/211 IPC
: NA

(15) Result of laboratory analysis :---

(16) Brief facts of the case:

16.1. The case was registered on the basis of a reliable source information that People’s Liberation Army (PLA), a proscribed terrorist organization, is involved in a criminal conspiracy to wage war against the country by threatening the unity, integrity, security and sovereignty of India. It was alleged that PLA is systematically organizing terrorist camps, extorting funds, recruiting personnel and imparting training for carrying out terrorist acts. PLA had imparted training to some of the cadres of Left Wing Extremists i.e. Communist Party of India (Maoist) in India for waging war against the country. It is also alleged that the Communist Party of India

(Maoist) cadres have paid funds to the PLA cadres for acquiring arms, ammunition and other communication devices and for imparting training to be used against the Indian Security Forces. The above mentioned allegations *prima facie* disclosed commission of offences by the cadres of PLA and Communist Party of India (Maoist). Accordingly this case was registered vide FIR No. RC-01/2011/NIA-GUW dated 11/07/2011 under Sections 120B, 121A of IPC and 17, 18, 18A and 18B of Unlawful Activities (Prevention) Act, 1967 against People's Liberation Army (PLA), a proscribed terrorist organization as per UA (P) Act, 1967 as amended in 2008. The investigation was taken up by NIA in pursuance of Govt of India order No. MHA UO No.1-11034/28/2011-IS-IV dated 8th June 2011.

16.2. During the investigation by the National Investigation Agency, offences under Section 120(B), 121(A) of IPC & under Sections 18, 18A, 20 & 39 of UA (P) Act 1967 (as amended) found to have been committed by the arrested accused persons in the instant case.

17. Facts Disclosed During Investigation.

17.1. Investigation has revealed that in the year of 2005, senior leadership of People's Liberation Army (PLA) and CPI (Maoist) agreed to partner with each other and continue their war against the Indian state. The leaders of CPI (Maoist) decided to recognise and support the war waged by PLA against Indian state for securing a separate country of Manipur out of India and the senior leadership of PLA decided to support the continuing war of CPI (Maoist) aimed at overthrowing the constitutionally elected government of India.

17.2. The PLA and the CPI (Maoist) are declared as terrorist organisations as per the *schedule* of Unlawful Activities (Prevention) Act 1967, as amended and mentioned at Sl. No 13 and Sl. No 34 respectively in the aforementioned Act.

17.3 The People's Liberation Army (PLA) and its Political Wing, the Revolutionary People's Front (hereinafter RPF) have also been declared as 'Unlawful Association' in terms of UA(P) Act, 1967 by Ministry of Home Affairs, Government of India through a Notification. The Notification mentions that the PLA has aim and objective of formation of an independent Manipur by secession of Manipur State from India through armed struggle. The PLA has been attacking the

Indian Security Forces, the Police, Government employees and law-abiding citizens in Manipur. The PLA has been indulging in acts of intimidation, extortion and looting of civilian population for collection of funds.

17.4. Investigation has established that in pursuance of the aforementioned conspiracy, the Standing Committee of PLA/RPF nominated its Chief of External Affairs Department to communicate with CPI (Maoist) leaders to build strong relationship with them. In or around 16 June, 2006, as instructed by top leaders of PLA, the Chief of External Affairs Department met the *Polit* Bureau & Central Committee Member of the CPI (Maoist) and discussed the modalities for future cooperation. After this meeting, a series of meetings were held between representatives of these two terrorist organizations during 2006-2008. The other *Polit* Bureau Members of CPI (Maoist) including but not limited to (1) General Secretary Mupalla Laxman Rao @ Ganpathy, (2) Eastern Regional Bureau Secretary Prasant Bose @ Kishan da, (3) Northern Regional Bureau Secretary Janardan, (4) Central Military Commander Prakash had also participated in meetings in furtherance of the said conspiracy.

17.5 Investigation has disclosed that leadership of CPI (Maoist) requested for training of its cadres and arms and ammunition from the PLA to continue their war against Indian State. After consultation, a plan was finalized and the PLA agreed to supply communication equipments, arms and ammunitions and military training to the CPI (Maoist).

17.6 Investigation revealed that in or around December 2006, after authorization from senior leadership of PLA and consultation with the CPI (Maoist), a Liaison Office of PLA in Kolkata was established and Arnold Singh @ Becon was placed as a Liaison Officer of the PLA. This was done to facilitate the activities of supply of arms and ammunition to the CPI (Maoist) by the PLA and also for facilitating training to CPI (Maoist) cadres.

17.7 In pursuance of the conspiracy to wage war against India, on or about latter half of 2008, the Standing Committee of PLA/RPF organized the 2nd Party Congress of the outfit around October of 2008 wherein a decision to restructure the organizational set up of the PLA was taken. Accordingly, in the External Affairs Department (hereinafter referred as EAD) of PLA, SS Maj. Gibon Luwang was

appointed as Secretary, SS Maj. Somi Singh was appointed as Assistant Secretary, SS Capt N Dilip Singh @ Wangba (A-1) was made Chief-1 and S. Dhiren Singh @ Raghu (A-2) was made Assistant Chief.

17.8 Investigation has disclosed that in the same party congress (around October, 2008) four cadres of CPI (Maoist) led by one Alok reached the PLA Headquarters in Myanmar. Accused Arnold Singh @ Becon (A-3) had escorted Alok from Kolkata to PLA Headquarters in Myanmar. A meeting was held between PLA/RPF and CPI (Maoist) leader/delegates; Irengbum Chaoren the SS President, MM Ngouba the SS Chief of Army Staff, Sanasam Gunen the SS Secretary General and Gypsy Sharma @ Changjou participated in the meeting on behalf of the PLA, and Alok and his team represented the CPI (Maoist). Investigation has disclosed that in the meeting, the Maoists requested the PLA for procurement of sophisticated weapons and in turn PLA asked for Ammonium Nitrate (explosive) from the CPI (Maoist). It was also decided in the meeting that both outfits should work together to achieve their objectives. Accordingly, a Joint Declaration between the CPI (Maoist) and PLA/RPF for working out modalities for unified action of waging war against the Union of India, was signed by Alok (Maoist) and Secretary General of PLA S. Gunen.

17.9. In pursuance of the said conspiracy, the newly appointed Chief of EAD SS Capt N. Dilip Singh @ Wangba (A-1), the Assistant Chief of EAD SS Lt S.Dhiren Singh @ Raghu (A-2) and SS Sgt Arnold Singh @ Becon (A-3) were briefed by Secretary General S. Gunen and Secretary EAD Gibon Luwang to regularly communicate with Maoist cadre Alok for negotiating with Maoists for finalizing the deal including but not limited to supply of Communication Devices, Arms and Ammunition.

17.10. Investigation has established that in pursuance of the said conspiracy, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) started staying in a rented room at Chanmari area of Aizawl City in the assumed name of Senjam Babu Singha. His main task was to facilitate PLA cadres to cross over the Indo-Myanmar Border and supervise the supply of items including weapons and Communication Devices for Maoists from PLA Camps in Myanmar to Guwahati. For concealing his real identity, accused S. Dhiren Singh @ Raghu (A-2) procured a number of fake identity proofs including Driving Licences and Identity Cards of different firms.

17.11. Investigation has also established that to co-ordinate with the CPI (Maoist) in-charge for the NE Region, and to receive the items from Aizawl, accused SS Capt N. Dilip Singh @ Wangba (A-1) started living [REDACTED] [REDACTED] in Guwahati in the assumed name of N. Ranjit. Accused SS Sgt Arnold Singh @ Becon (A-3) was already staying [REDACTED] in Kolkata from where the Liaison Office of the PLA was functioning. He stayed there under the pretext of doing some Computer Course. The rent of these accommodations was used to be paid by the PLA.

17.12. Investigation has established that as per the deal, the CPI (Maoist) had to pay Rs 50 lakh to the PLA for supply of Communication Devices, arms and ammunition by the end of year 2009. Accordingly, in the beginning of year 2009, Maoist cadre Raj gave Rs 13 lakh to SS Capt Gypsy Sharma as first instalment of advance payment.

17.13. Investigation has disclosed that in pursuance of the said conspiracy, on 8th May 2009, as per the directions of the central leadership of the PLA, a team of four PLA Cadres namely (1) SS Lt Angkimang @ Chinglen Sharma, (2) SS Sgt Chinglensana, (3) SS Sgt Sital, and (4) SS Sgt S Ahingcha visited CPI (Maoist) Camp for imparting of Military Training to CPI (Maoist) cadres. The main objective of the said team was to understand the ground conditions i.e. level of trainees, climate, topography of region, food arrangements and lodging, to design a good Training Programme for training of CPI (Maoist) Cadres.

17.14. Investigation has disclosed that the above mentioned team of PLA cadres had started from Guwahati on 21st May, 2009 and on 22nd May 2009, reached Kolkata. In Kolkata, they had stayed in the room of accused SS Sgt Arnold Singh @ Becon (A-3). On 23rd May, 2009, Maoist cadre Raj took them along to the CPI (Maoist) Camp located inside the Dandakaranya Forest in Chhattisgarh. They had stayed in the said camp of the CPI (Maoist) and studied the ground conditions for Military Training. The PLA team had to visit Jharkhand also, however, they were forced to cut short its tour due to illness of its members and returned to Guwahati on 1st of July, 2009. The team submitted its report to Chief of EAD SS Capt N. Dilip Singh @ Wangba (A-1) mentioning the ground conditions observed by them.

17.15. In pursuance of the aforesaid conspiracy, accused SS Capt N. Dilip Singh @ Wangba (A-1) and accused SS Sgt Arnold Singh @ Becon (A-3) met Maoist Cadre Comrade Alok and Comrade Raj on 28th June, 2009 in Guwahati. In the meeting, SS Capt N. Dilip Singh @ Wangba (A-1) on behalf of the PLA, assured Alok and Raj that as per the deal he would supply arms and ammunition to them and they had to pay Rs. 30 Lakh for the same. Alok also asked them to procure more TH-K2AT wireless sets. Alok also requested for early supply of at least two RPGs so that the CPI (Maoist) could attack the Indian Security Forces Camp in the near future.

17.16. Investigation has established that in pursuance of the said conspiracy, on or about July 2009, accused SS Capt N. Dilip Singh @ Wangba (A-1) handed over about 1700 live ammunitions of AK Rifle, one 9mm Pistol with magazine to the accused SS Sgt Arnold Singh @ Becon (A-3) at his Guwahati hide-out for supplying those to CPI (Maoist) cadres as per the deal. Further, on 18th August, 2009 Alok, along with Raj, met accused SS Sgt Arnold Singh @ Becon (A-3) at latter's rented room in Kolkata and requested to deliver Guns with ammunition and walkie-talkies before 15th September as the CPI (Maoist) had planned to attack a Camp of Indian Security Force. Raj also paid Rs 10 lakh as second instalment to accused SS Sgt Arnold Singh @ Becon (A-3) on 22nd August, 2009. In furtherance to said deal again in November 2009, accused SS Capt N. Dilip Singh @ Wangba (A-1) handed over 1280 live rounds of AK Rifle, one 9mm Pistol with two Magazines to the accused SS Sgt Arnold Singh @ Becon (A-3) at his Guwahati hide-out for supplying those to Maoists as per the deal. Accused SS Sgt Arnold Singh @ Becon (A-3) supplied all the aforesaid arms and ammunition to Maoist cadres in Guwahati.

17.17. Investigation has established that in pursuance of the said conspiracy, in October 2009, the Assistant Chief of EAD SS Lt S.Dhiren Singh @ Raghu (A-2) was shifted to Kolkata for better coordination with Maoists. He hired two rooms in [REDACTED] [REDACTED] Kolkata and started staying there with his family.

17.18. Investigation has established that on 6th October 2009, in pursuance of the said conspiracy, the accused SS Sgt Arnold Singh @ Becon (A-3) visited Cuttack, Odisha along with Maoist cadre Raj and met Eastern Regional Bureau Secretary of the CPI (Maoist) Kishan da. Kishan da handed over a letter to Becon

addressed to the Assistant Secretary EAD, PLA/RPF SS Maj Somi intimating the arrest of Maoist cadres Alok and Kartik by the Indian Security Forces. Accused SS Sgt Arnold Singh @ Becon (A-3) visited Nepal along with the accused SS Lt S.Dhiren Singh @ Raghu (A-2) and Maoist cadre Raj and handed over the said letter personally to SS Maj Somi.

17.19. Investigation has established that on 21st October 2009, Maoist cadre Raj met the accused SS Lt S.Dhiren Singh @ Raghu (A-2) and SS Sgt Arnold Singh @ Becon (A-3) at latter's rented room in Kolkata and informed them that *Polit* Bureau of CPI (Maoist) had decided to postpone the training programme of Maoist cadres by PLA instructors scheduled for November due to operation launched by the Indian Security Forces in their area. Raj requested them for immediate delivery of three 79 MM Lethod Guns with ammunitions. He further told that he would arrange rest of the amount as promised in the deal. Accordingly, in pursuance of the conspiracy Raj gave an amount of Rs 10 lakh to the accused SS Sgt Arnold Singh @ Becon (A-3) on 06.11.2009 at latter's rented room in Kolkata as a part payment of the earlier deal.

17.20. Investigation has established that on 7th November 2009, in pursuance of the said conspiracy, the accused SS Sgt Arnold Singh @ Becon (A-3) reached Guwahati where the accused SS Capt N.Dilip Singh @ Wangba (A-1) was staying. On 9th November, he met SS Capt N.Dilip Singh @ Wangba (A-1) at latter's rented house at [REDACTED] and handed him over the money which he had received from Maoist cadre Raj as part payment of the earlier deal.

17.21. Investigation has established that on or about the second week of November 2009, in pursuance of the said conspiracy, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) along with SS Sgt Arnold Singh @ Becon (A-3) and Maoist cadre Raj went to Nepal to meet Assistant Secretary of EAD SS Maj Somi Singh. On 15th November, they met SS Maj Somi Singh. SS Maj Somi Singh instructed SS Lt S.Dhiren Singh @ Raghu (A-2) to deliver the consignment of Lethod Gun to the CPI (Maoist) in Dimapur. It was also decided in the meeting that Raj would provide the vehicle for transporting consignment from Imphal to Dimapur.

17.22. Investigation has revealed that on 3rd December 2009, in pursuance of the said conspiracy, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) and SS Sgt

Arnold Singh @ Becon (A-3) went to Dimapur and took over a vehicle from a Maoist cadre as arranged by Raj for transportation of Lethod Gun consignment. The accused SS Lt S.Dhiren Singh @ Raghu (A-2) managed to send the vehicle to Imphal from Dimapur through one Leilengba of Imphal.

17.23. Investigation has established that as arranged by the accused SS Lt S.Dhiren Singh @ Raghu (A-2) and SS Sgt Arnold Singh @ Becon (A-3), Leilengba received the consignment of arms in Imphal from a PLA cadre on or around 13th December 2009. On 16th December 2009, Leilengba was arrested by Imphal Police. However, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) managed to shift the consignment and the vehicle in safe custody through his acquaintance. Finally the aforesaid vehicle was taken over by one Kiyamba on the instruction of accused S Dhiren Singh @ Raghu (A-2) and further handed over to Maoist cadre in Dimapur.

17.24. Investigation has brought out that in pursuance of the said conspiracy sometime in the third week of March 2010, the accused SS Capt N.Dilip Singh @ Wangba (A-1) and SS Lt S.Dhiren Singh @ Raghu (A-2), on the instruction of Secretary EAD Gibon Luwang, visited Eastern Regional Bureau Headquarters of the CPI (Maoist) in Jharkhand. Maoist cadre Raj had also accompanied them. A meeting was held there from 18th March to 20th March, 2010. In the meeting, Secretary, ERB Kishan da, Member of Central Military Commission Sagar, Members Kamal and Raj had participated on behalf of CPI (Maoist).

17.25. Investigation has revealed that during the meeting the CPI (Maoist) proposed that the PLA should send at least two instructors for imparting Military Training and two instructors for imparting Communication Training to the CPI (Maoist) cadres for 12 to 14 months in the first week of September. They also requested the PLA to supply more arms & ammunition and Wireless Communication Sets. The accused SS Capt N.Dilip Singh @ Wangba (A-1) and accused SS Lt S.Dhiren Singh @ Raghu (A-2) assured the Maoist leaders for positive and timely action on both requests. Accordingly, a document containing main issues discussed in the meeting was prepared and signed by both the parties. The accused SS Capt N.Dilip Singh @ Wangba (A-1) signed it on behalf of PLA/RPF and one Sagar signed it as the representative of the CPI (Maoist).

17.26. It is also evident that at the end of meeting, two letters from Maoist side along with the signed documents were handed over to the accused SS Capt N.Dilip Singh @ Wangba (A-1) by Kishan da to further hand it over to SS President of PLA/RPF Irengbam Chaoren. First letter dated 24.01.2010 from the General Secretary of CPI (Maoist) Ganpathi was regarding 'Operation Green Hunt' launched by the Security Forces against Maoists. Second letter dated 22.03.2010 from the Central Committee Member Kishan da was about the outcome of this bipartite meeting. The accused SS Capt N.Dilip Singh @ Wangba (A-1) sent all three documents through his email '[REDACTED]@gmail.com' to the Secretary of EAD Gibon Luwang.

17.27. Investigation has brought out that as a follow-up of the above-mentioned bipartite meeting; the SS President of PLA/RPF Irengbam Chaoren wrote a letter to the General Secretary of CPI (Maoist) on 13th April 2010, conveying assurance that the PLA/RPF would be sending its instructors for Military and Communication Training to Maoist cadres. He also expressed his readiness to further proceed on the proposal of formation of 'Strategic United Front' to fight against the Indian Security Forces. He congratulated the CPI (Maoist) for carrying out successful attack on the Indian Security Forces on 6th April, 2010 which resulted in the killing of 76 CRPF personnel.

17.28. Investigation has revealed that the above-mentioned letter was sent as attachment by the accused SS Capt N.Dilip Singh @ Wangba (A-1) through his email 'woodland1960@gmail.com' to co-accused SS Sgt Arnold Singh @ Becon (A-3) on his email id '[REDACTED]@gmail.com' on 5th May, 2010. Accused SS Sgt Arnold Singh @ Becon (A-3) further handed over the hardcopy of letter to Maoist cadre Raj in Kolkata.

17.29. Further it is evident that on getting the letter from SS PLA/RPF President, the General Secretary of CPI (Maoist) Ganpathy again wrote a letter to SS President of PLA/RPF on 22nd June 2010 appreciating the role played by the accused SS Capt N.Dilip Singh @ Wangba (A-1) and accused SS Lt S.Dhiren Singh @ Raghu (A-2) in strengthening the bilateral relations. He also thanked the SS President of PLA/RPF for his support in developing the ongoing guerrilla war of the Maoists into a mighty war against the Indian Security Forces. The softcopy of the letter was given to accused SS Sgt Arnold Singh @ Becon (A-3), who had sent it as

attachment file through his email id ' [REDACTED]@gmail.com' to accused SS Capt N.Dilip Singh @ Wangba (A-1) on 18th July 2010. On receiving this email from accused SS Sgt Arnold Singh @ Becon (A-3), accused SS Capt N.Dilip Singh @ Wangba (A-1) forwarded the email to Secretary EAD Gibon Luwang at his email address ' [REDACTED]@gmail.com' on 18th July 2010 and to Assistant Secretary EAD Maj Somi Singh at his email address ' [REDACTED]@gmail.com' on 21st July 2010.

17.30. Investigation has revealed that in pursuance of ongoing conspiracy in or around June 2010, pursuant to the decision taken in bipartite meeting held in March 2010, the PLA standing Committee consisting of its SS President, SS Vice President and SS Secretary General decided to organize a camp for imparting military and communication training to the Maoist cadres to strengthen them to attack on the Indian Security Forces more effectively and efficiently.

17.31. Investigation has established that in or around July 2010, in pursuance of the said conspiracy, the PLA leadership dispatched a team of its Instructors from its Headquarters for the purpose of imparting Military and Communication Training to the Maoist cadres. The said team consisted of accused SS Capt N.Dilip Singh @ Wangba (A-1), SS Sgt Maj Kunjo, the Military Instructor, SS Sgt Hitler, Military Instructor, SS Cpl Rome @ Amar, the Signal Instructor, and SS Sgt Arnold Singh @ Becon (A-3).

17.32. Investigation has brought out that on 29th July 2010, the three instructors reached Guwahati and reported to accused SS Capt N.Dilip Singh @ Wangba (A-1). The team stayed at Urvashi lodge, Guwahati after taking a room there under an assumed name. On the same day accused SS Capt N.Dilip Singh @ Wangba (A-1) came to Urvashi Lodge and briefed the PLA instructors regarding the training program for Maoist cadres in Jharkhand.

17.33. Investigation has established that on 30th July 2010, accused SS Sgt Arnold Singh @ Becon (A-3) met the PLA instructors at Guwahati Railway Station where the instructors were to board train for Kolkata. SS Sgt Arnold Singh @ Becon (A-3) had accompanied the instructors up to Kolkata. Accused SS Capt N.Dilip Singh @ Wangba (A-1) was to join the team in Kolkata in the last week of August, at the time of their departure for Saranda Jungle.

17.34. Investigation has established that on 31st July, 2010, the accused SS Sgt Arnold Singh @ Becon (A-3) along with PLA instructors reached Kolkata and arranged their stay at his rented room in Tollygunge. In the second week of August 2010, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) along with Maoist Raj came to the said rented room of SS Sgt Arnold Singh @ Becon (A-3) and briefed the PLA instructors about the living/security condition in Saranda Jungle.

17.35. Investigation has established that on 17th August 2010, SS Sgt Arnold Singh @ Becon (A-3) along with the PLA instructors and Maoist guides left Kolkata for Rourkela by train. The PLA instructors travelled under assumed names Tomba, Dharmen and Rome, however, SS Sgt Arnold Singh @ Becon (A-3) travelled as A.Singh.

17.36. Investigation has established that the PLA team, guided and escorted by Maoist cadres, reached Saranda Jungle on 20th August 2010. The PLA team met with Comrade Sagar, Member of Central Military Commission of CPI (Maoist). For this training, the Maoist cadres had gathered from different places. The PLA instructors prepared a proper training camp including Barracks & Drill ground with the help of the Maoist cadres. The training started on 11th September 2010.

17.37. Investigation has disclosed that in pursuance of the aforesaid conspiracy, the PLA instructors did impart training to Maoist cadres on various disciplines including but not limited to Weapons handling, Firing, Jungle Warfare and War Tactics. The training concluded on 20th November 2010. At the time of valediction, senior members of CPI (Maoist) including but not limited to (1) Prasant Bose @ Kishan da, (2) Sagar, and (3) Nishan da were present. Kishan da gave the PLA instructors Rs 40,000. The PLA team led by accused SS Sgt Arnold Singh @ Becon (A-3) left the Saranda jungle on 28th November 2010 and reported to the accused SS Capt N.Dilip Singh @ Wangba (A-1) in Guwahati. Thereafter, the instructors returned to the PLA Headquarters in Myanmar.

17.38. Investigation has established that on 30th December 2010, Comrade Sagar of CPI (Maoist) wrote a letter to The General Secretary, PLA/RPF regarding the visit of PLA Instructors and Military training to Maoist Cadre. In the letter, it is clearly mentioned that the accused SS Capt N.Dilip Singh @ Wangba (A-1) handed over HF Wireless Sets to a Maoist cadre in the latter part of September 2010.

Investigation has disclosed that these HF Sets were handed over to the accused SS Capt N.Dilip Singh @ Wangba (A-1) at ISBT, Guwahati on 17th September 2010 by a PLA Member named Kiyamba as per the instruction of accused S. Dhiren Singh @ Raghu (A-2). Accused SS Capt N.Dilip Singh @ Wangba (A-1) further handed over the HF Sets to a Maoist cadre in Guwahati. The letter also mentions presence of accused SS Sgt Arnold Singh @ Becon (A-3) at Maoist camp during training.

17.39. Investigation has established that on 26th May 2011, Comrade Sagar of CPI (Maoist) wrote a letter to accused SS Capt N.Dilip Singh @ Wangba (A-1). In the letter, he mentioned that the PLA instructors had imparted training to one batch in 2010. To discuss the modalities of training for the second batch, Sagar invited him to visit ERB Headquarters in Jharkhand in the latter half of July 2011. Sagar also requested accused SS Capt N.Dilip Singh @ Wangba (A-1) to send the 'Key' of Radio Set, which he had supplied earlier. He further requested him to send more Radio Sets of same model with Key. SS Capt N.Dilip Singh @ Wangba (A-1) forwarded the letter to SS Secretary EAD Gibon Luwang through SS Assistant Secretary EAD Somi Singh on latter's email address '██████████@gmail.com'.

17.40. Investigation has established that in pursuance of aforesaid criminal conspiracy SS Capt N.Dilip Singh @ Wangba (A-1) used to communicate with Comrade Sagar of CPI (Maoist) through emails on latter's email address '██████████@rediffmail.com'.

17.41. Investigation has established that the accused SS Capt N.Dilip Singh @ Wangba (A-1), as directed by SS Maj Somi Singh, the Assistant Secretary of EAD, went to New Delhi to meet SS 2nd Lt Salam Arun Kumar @ Willow, the Assistant Chief-II of EAD, PLA. Both of them were apprehended by the Special Cell of Delhi Police and a case FIR No 51/2011 u/s 18 & 20 UA (P) Act was registered against them.

17.42. Investigation has brought on record that on 1st January 2012, in pursuance of the aforesaid conspiracy, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) left Guwahati on a Bus and reached Silchar to meet Maoist cadre Raj. On 2nd January, he reached Silchar and met Maoist cadre Raj there. Raj handed over him two letters from Comrade Sagar of CPI (Maoist) to be further handed over to PLA leaders. In the letters Comrade Sagar had mentioned the future strategies of

ongoing cooperation of PLA with CPI (Maoist) in fighting against the Indian Security Forces especially after the arrest of N. Dilip Singh @ Wangba (A-1). The soft copies of these letters were recovered from email of the accused SS Lt S.Dhiren Singh @ Raghu (A-2). Both Raj and SS Lt S.Dhiren Singh @ Raghu (A-2) stayed in Silchar at the accommodation arranged by the latter.

17.43. Investigation has disclosed that on 3rd February 2012, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) was arrested by the Special Task Force of Kolkata and a case FIR No 21/2012 u/s 25(1A) Arms Act was registered against him.

17.44. Investigation has disclosed that during the aforesaid criminal conspiracy about 400 criminal cases have been registered against PLA cadres in Manipur in which 295 arrests were made, around 26 Pistols, 22 AK Rifles, 2 Carbines, 72 Lethod Guns, 13 Mortar Shells, 22 Hand Grenades 4000 live ammunitions and high explosives with detonators were recovered from the possession of arrested PLA Cadres. These facts clearly establish that PLA cadres are involved in terrorist activities with the intent to wage war against the Government of India.

17.45. Investigation has revealed that, the Publicity Department of PLA has been issuing press releases about activities of PLA from time to time for propaganda and publicity about the outfit and its objective. For the said purpose, Publicity Department of PLA has sent press releases to the Editors of the Manipur based News Papers. Earlier the News Houses used to receive the hardcopy of Press Releases from PLA/RPF on its printed letter-head for publishing in their respective newspapers, but now News Houses are receiving the press releases through Emails. During investigation various press releases on the PLA/RPF letterhead have been collected from News Houses which establishes the fact that PLA/RPF, a proscribed terrorist outfit, is involved in terrorist activities with intent to wage war against the Government of India. The said Publicity Department also circulates the Press Release through email to its Central Cadres. A number of said press releases were also found and recovered from the emails of accused N.Dilip Singh @ Wangba (A-1) and S.Dhiren Singh @ Raghu (A-2).

17.46. During investigation, the material objects i.e. Mobile Handset with BSNL SIM Card recovered from the rented room of N.Dilip Singh @ Wangba (A-1)

were sent to the State FSL, Guwahati and the handwritten documents containing incriminating evidence were sent to CFSL Chandigarh for forensic examination and expert opinion. The Expert Reports are still awaited and would be submitted to the Court as and when received.

17.47. Investigation has also revealed that accused SS Capt N.Dilip Singh @ Wangba (A-1) was arrested on 1st October 2011 along with another PLA cadre Salam Arun Kumar @ Willow in New Delhi by the Special Cell of Delhi Police. At the time of arrest one Laptop, three mobile phones no [REDACTED] and [REDACTED], one Tata Photon and a fake photo identity card in the name of N.Ranjit were seized from his possession. A case FIR No 51/2011 u/s 18, 20 of UA (P) Act was registered against them which resulted in filing of the charge-sheet against accused N.Dilip Singh @ Wangba u/s 18, 20 UA (P) Act and 419, 420, 468 & 471 IPC. Accused N.Dilip Singh @ Wangba (A-1) was formally arrested by the NIA in the instant case on 28th November, 2011.

17.48. Investigation has revealed that accused N.Dilip Singh @ Wangba (A-1) was using email id '[REDACTED]@gmail.com' for communicating with other co-accused, senior functionaries of PLA/RPF stationed at different places abroad and CPI (Maoist) Cadres to maintain secrecy. The incriminating emails were recovered from the email ID '[REDACTED]@gmail.com' of accused N.Dilip Singh @Wangba on his disclosure.

17.49. The investigation has revealed that upon the disclosure of accused SS Capt N.Dilip Singh @ Wangba (A-1) a mobile phone and a diary containing passwords to open the files send by other PLA members through e-mail were seized from [REDACTED] [REDACTED] Guwahati, Assam where the said accused was staying on rent during the year 2011.

17.50. Investigation has revealed that accused N. Dilip Singh @ Wangba (A-1), S.Dhiren Singh @ Raghu (A-2) and Arnold Singh @ Becon (A-3) were regularly receiving funds from the PLA. They used to send their monthly demand for money to their superiors in External Affairs Department of the PLA i.e. SS Assistant Secretary and SS Secretary through email. The actual Budget sanctioned by PLA authorities

was also communicated to them every month through email. The budget related mails were also recovered from the email accounts of aforesaid accused persons.

17.51. Investigation has revealed that the accused S.Dhiren Singh @ Raghu (A-2) was arrested for the first time in May 1995 along with a PLA cadre. A case FIR No 2/95 u/s 120/121A IPC was registered against him at North Vanlaiphai Police Station, Mizoram. The investigation has revealed that the accused SS Lt S.Dhiren Singh @ Raghu (A-2) was also arrested by Imphal Police in connection with FIR No 500(6)/1995 u/s 121/121-A/400 IPC, 25 (1-B) Arms Act, 3 Explosive Substances Act of Imphal West Police Station, Manipur. After his release, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) fled away to Bangladesh and worked in the External Affairs Department of PLA at Bangladesh till 2004.

17.52. Investigation has revealed that in 2004, the accused SS Lt S.Dhiren Singh @ Raghu (A-2) was detained by Udharband Police and brought to Udharband Police Station for interrogation. But he escaped from the police custody. As per report of Officer in Charge of Udharband Police Station, Cachar a Case FIR No. 122/2004 u/s 224 IPC dated 13.08.2004 was registered against the accused S.Dhiren Singh @ Raghu (A-2) at PS Udharbond in this regard and the Charge-Sheet No 150 dated 31.10.2005 was filed showing him as absconder.

17.53. The investigation has revealed that after participating in 2nd Party Congress of the PLA in Myanmar, in or around January 2009, the accused SS Lt S.Dhiren Singh @ Raghu (A-2), in pursuance of the aforesaid conspiracy, shifted his base from Bangladesh to Mizoram. In Mizoram, he had two over-ground PLA members namely Kiyamba and Mangol Singh. The Budget demands made by accused SS Lt S.Dhiren Singh @ Raghu (A-2) since 2009 and the Budget sanction by PLA authorities clearly established the regular demand and sanction of money for Kiyamba & Mangol. PLA had hideouts in Aizawl and Champhai. He used to facilitate PLA cadres in crossing over Indo-Burma border illegally from either side. PLA used to give additional funds to accused SS Lt S.Dhiren Singh @ Raghu (A-2) every month for this specific work of facilitating border crossing.

17.54. Accused S.Dhiren Singh @ Raghu (A-2) was arrested by NIA on 07.03.2012 on the strength of Production Warrant issued by the Special NIA Court, Guwahati. Investigation further revealed that accused S.Dhiren Singh @Raghu (A-2)

was using email ids '████████@gmail.com' and '████████@gmail.com' for communicating with other PLA cadres including his Chief N.Dilip Singh @ Wangba (A-1) and Liaison Officer for Maoist Arnold Singh (A-3).

17.55. The recovered emails had clearly brought out the involvement of accused S.Dhiren Singh @ Raghu (A-2) as Assistant Chief of EAD of PLA with regards to building strategic relationship with CPI (Maoist) and strengthen them by means of imparting Military Training & supplying arms and ammunition to them. Internal letters from senior PLA cadres including SS President and SS Secretary General's were also found in the mail. Mails also corroborated his activities for PLA in Kolkata and Mizoram. Reports of outfit related activities of his assistants in Mizoram were also found in mail. Emails also contained Monthly Budget Sanction of Members of EAD, PLA including A-1, A-2 and A-3.

17.56. The investigation has revealed that for receiving the funds from PLA and withdrawing them at different places, accused SS Lt S.Dhiren Singh @ Raghu (A-2) opened three Bank Accounts in Aizawl. The ██████ Account No. ██████ was opened on 28.08.2009, in the name of Senjam Babu Singha r/o 174A, Zothanmawia Building, Dawrpui West, Aizawl, Mizoram, Mobile Number ██████. The ██████ Bank Account No. ██████ was opened on 29.07.2010, in the name of Senjam Babu Singha r/o 174A, Zothanmawia Building, Dawrpui West, Aizawl, Mizoram, Mobile Number ██████. And the third Account bearing No. ██████ at ██████, Aizawl was opened by him in the name of his wife S.Sobita Singh d/o Pakchand r/o Hrangchhuana Pharmacy, Civil Hospital, Aizawl, Mizoram.

17.57. It is also evident that in all these Bank Accounts operated by accused SS Lt S.Dhiren Singh @ Raghu (A-2), more than Rs 15,00,000 had been credited despite the fact that he did not have any ostensible source of income and no legal means of earning money. Neither accused SS Lt S.Dhiren Singh @ Raghu (A-2) nor his wife Sobita is employed anywhere. All the three accounts were opened in Aizawl using fake identity or address proof to avoid linking his actual identity of Senjam Dhiren Singh with these Bank Accounts. Further, though the money was being withdrawn in Kolkata, it used to be deposited in the said accounts in Imphal on behalf of PLA.

17.58. The investigation has disclosed that Arnold Singh @ Becon (A-3) had been arrested by the Assam Police for possessing 'Ganja' in the case No 290/2002 dated 07.09.2002 u/s 20(B) NDPS Act at Paltan Bazar Police Station and a chargesheet No 140 dt 19.09.2002 was filed in the court against him. After being released on bail, he left home and joined the PLA as motivated by co-accused S.Dhiren Singh @ Raghu (A-2). After joining PLA, he stayed in Bangladesh for almost four years. In December 2006, he was sent to Kolkata as Liaison Officer for CPI (Maoist). In Kolkata, he stayed at two different places and both places were used as hide-outs of the PLA.

17.59. Accused Arnold Singh @ Becon (A-3) was arrested by NIA on 02.04.2012. Investigation has disclosed that accused Arnold Singh @Becon (A-3) was using email id ' [REDACTED] @gmail.com' for communicating with other PLA cadres including co-accused N.Dilip Singh @ Wangba (A-1) and S.Dhiren Singh @ Raghu (A-2).

17.60. The investigation has brought on record, evidence pertaining to the other emails used by the prominent members of PLA in furtherance of the conspiracy as alleged in the investigation. The scrutiny of the emails obtained during the investigation has clearly brought out the commission of the offences under which the instant case is being investigated.

17.61. The investigation thus conducted has established the involvement of accused N.Dilip Singh @ Wangba (A-1) in the instant case. A-1 as a member of the proscribed terrorist organisation PLA, entered into a criminal conspiracy of waging war against India by imparting training and organising training camps for the proscribed terrorist organisation CPI (Maoist), in pursuance of the said conspiracy A-1 in association of the other co-conspirators including but not limited to A-2 and A-3; travelled to different places within and outside India; stayed in different cities of India especially Guwahati, Kolkata, Delhi and so on in assumed name so as to avoid detection by the law enforcement authorities; met the co-conspirators physically, made telephone contacts and email communication so as to pursue the said criminal conspiracy; in furtherance of the said conspiracy A-1 in association of the co-conspirators imparted training to the CPI (Maoist) cadres at Saranda forest for waging war against the Union of India and knowingly fostered terrorist activities,

further in association of the other co-conspirators including but not limited to A-2 and A-3 facilitated the supply of items including but not limited to arms, ammunition and communication devices to the proscribed terrorist organisation CPI(Maoist), thus committed offences of Criminal Conspiracy to wage war against India, Conspiracy for terrorist activities, Organizing Camp for imparting training in terrorism, being the member of a terrorist organization PLA and supporting another terrorist organization the CPI (Maoist).

17.62. The investigation thus conducted has also established the complicity of accused S.Dhiren Singh @ Raghu (A-2) in the instant case. A-2 as a member of the proscribed terrorist organisation PLA, entered into a criminal conspiracy of waging war against the country by organising training camps for proscribed terrorist organisation CPI (Maoist); in pursuance of the said conspiracy A-2 in association of the co-conspirators including but not limited to A-1 and A-3, travelled to different places within and outside India, stayed in different cities of India especially Guwahati, Kolkata and Aizawl in assumed name so as to avoid detection by the law enforcement authorities, facilitated PLA cadres in illegally crossing over Indo-Burma international border; opened Bank Accounts in assumed names to receive the funds from the outfit for unlawful activities; met the co-conspirators physically, made telephone contacts and email communication so as to pursue the said criminal conspiracy. In furtherance of the said conspiracy A-2 in association of the co-conspirators organized camp for imparting training to the CPI (Maoist) cadres at Saranda forest for waging war against the Union of India and knowingly fostered terrorist activities; further in association of the co-conspirators including but not limited to A-1 and A-3 facilitated the supply of items including but not limited to arms, ammunition and communication devices to the proscribed terrorist organisation CPI(Maoist), thus committed offences of Criminal Conspiracy to wage war against the Country, Conspiracy for terrorist activities, Organizing Camp for imparting training in terrorism, being the member of a terrorist organization PLA and supporting another terrorist organization CPI (Maoist).

17.63. The investigation thus conducted has also established the complicity of accused Arnold Singh @ Becon (A-3) in the instant case. A-3 as a member of the proscribed terrorist organisation PLA, entered into a criminal conspiracy of waging war against India by imparting training and organising training camps for proscribed

terrorist organisation CPI (Maoist); in pursuance of the said conspiracy A-3 in association of the co-conspirators including but not limited to A-1 and A-2, travelled to different places within and outside India; stayed in Kolkata, Guwahati so as to liaise with CPI (Maoist) cadres easily; met the co-conspirators physically, made telephone contacts and email communication so as to pursue the said criminal conspiracy. in furtherance of the said conspiracy, A-3 in association of the co-conspirators including but not limited to A-1 and A-2 facilitated the supply of items including but not limited to arms, ammunition and communication devices to the proscribed terrorist organisation CPI (Maoist), thus committed offences of Criminal Conspiracy to wage war against India, Conspiracy for terrorist activities, Organizing Camp for imparting training in terrorism and terrorist acts being the member of a terrorist organization PLA and supporting another terrorist organization CPI (Maoist).

18. CHARGE

1. N.Dilip Singh @ Wangba @N. Ranjit @ Jana s/o Late N. Iboton Singh under sections 120-B, 121-A of IPC & Sections 18, 18-A, 20 & 39 of UA (P) Act 1967 as amended.
2. Senjam Dhiren Singh @ S.Babu Singh @ S. Babu Singha @ Raghu @ S. Dhiren Singha @ Macha s/o Late Biren Singh under Sections 120-B, 121-A of IPC & Sections 18, 18-A, 20 & 39 of UA (P) Act, 1967 as amended.
3. Arnold Singh @Kh Arnold Singha @ Becon s/o Sushil Kumar Singh under Sections 120-B, 121-A of IPC & Sections 18, 18-A, 20 & 39 of UA (P) Act 1967 as amended.

19. The sanction for prosecution under Section 196 of the Code of Criminal Procedure, 1973 and Section 45(1) of Unlawful Activities (Prevention) Act, 1967 has been obtained from the competent authority and enclosed.

20. It is, therefore, prayed that this Hon'ble court may be pleased to take cognizance of the offences as mentioned above and issue process to the accused persons to stand trial in accordance with law.

21. Despatched on :

22. No. of enclosures : 4

23. List of enclosures : Annexure A (List of witnesses)
Annexure B (List of Documents)
Annexure B1 (List of emails)
Annexure C (List of Material Objects)

Submitted,

Name: Aseem Srivastava
Addl. Superintendent of Police/
Investigating Officer,
NIA, New Delhi

