



**NATIONAL INVESTIGATION AGENCY
MINISTRY OF HOME AFFAIRS
GOVERNMENT OF INDIA
NEW DELHI.**

**CHARGE SHEET
(U/s 173 Cr P C)**

**BEFORE THE HONOURABLE SPECIAL COURT
FOR N.I.A CASES, HYDERABAD, ANDHRA PRADESH STATE**

STATE

V/s

MORJEN HOSSAIN AND OTHERS

- 1 . Name of the Branch** : National Investigation Agency,
Hyderabad.
- FIR No.** : 1/2012
Year : 2012
Date : 03-01-2012
- 2 . Final Report/
Charge Sheet** : Final Report – 2
- 3 . Date** : 31-08-2012.
- 4 . Sections of Law** : U/s 489 (B), 489 (C) r/w 120-B of
IPC and Sections 16 & 18 of
Unlawful Activities (Prevention) Act,
1967 (as Amended in 2008).
- 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** : Supplementary Charge Sheet
- 8 . **Name of Investigating Officer** : [REDACTED],
Addl. Supt. of Police,
NIA, Hyderabad.
- 9 . **Name of the Complainants/ Informants** : National Investigation Agency
Hyderabad.
- 10 . **Details of properties/ Articles /Documents Recovered/ seized during Investigation and relied Upon.** : As per the list enclosed
in Annexure B & C

11. PARTICULARS OF ACCUSED PERSON CHARGE SHEETED:

1) JANAB HASSAN - A-23

1	Name	Janab Hassan
2	Whether verified	Yes
3	Age	24 years
4	Father's name	Mir Hassan
5	Sex	Male
6	Nationality	Indian
7	Passport details	No Passport


8	Occupation	Car Driver
9	Address (present)	Bura Village, Kairana Tahsil, Prabudhnagar District, Uttar Pradesh State.
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Nil
13	Regular Criminal No.(If known)	Nil
14	Date of arrest	27-03-2012
15	Date of release on bail	Not Released on bail
16	Under Act and Sections (of charge sheet)	U/s 489 (B), 489 (C) r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008)
17	Name(s) of bailer/sureties and Address	Not applicable
18	Previous Cases	Nil
19	Previous convictions with case Reference	Nil
20	Status of accused	In Judicial Custody

2) IMRAN KHAN @ IMRAN - A-24

1	Name	Imran Khan @ Imran
2	Whether verified	Yes
3	Age	25 years
4	Father's name	Manzoor Ali
5	Sex	Male
6	Nationality	Indian
7	Passport details	No Passport
8	Occupation	Labour/Maruti Omni Van driver

9	Address (present)	R/o Bura Village, Kairana Tahsil, Prabudhnagar District, Uttar Pradesh State.
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Nil
13	Regular Criminal No.(If known)	Nil
14	Date of arrest	27-03-2012
15	Date of release on bail	Not Released on bail
16	Under Act and Sections (of charge sheet)	U/s 489 (B), 489 (C) r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008)
17	Name(s) of bailer/sureties and Address	Not applicable
18	Previous Cases	Nil
19	Previous convictions with case Reference	Nil
20	Status of accused	In Judicial Custody

3) MASOOD AKHTAR ANSARI @ NAYEEM- A-25

1	Name	Masood Akhtar Ansari @ Nayeem
2	Whether verified	Yes
3	Age	51 years
4	Father's name	Waheedur Raheman
5	Sex	Male
6	Nationality	Indian
7	Passport details	

8	Occupation	Manager of AL-Nishath collections Cloth Shop at 97/98 Ibrahim Saheb Street, Bengaluru City, Karnataka State.
9	Address (present)	H.No.26/1, B Cooks Road, B2 Timmaiah Road Cross, Bengaluru City, Karnataka State.
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Nil
13	Regular Criminal No.(If known)	Nil
14	Date of arrest	29-03-2012
15	Date of release on bail	Not Released on bail
16	Under Act and Sections (of charge sheet)	U/s 489 (B), 489 (C) r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008)
17	Name(s) of bailer/sureties and Address	Not applicable
18	Previous Cases	Nil
19	Previous convictions with case Reference	Nil
20	Status of accused	In Judicial Custody


4) MOHAMMED SHAFI - A-26

1	Name	Mohammed Shafi
2	Whether verified	Yes
3	Age	26 years
4	Father's name	Abdul Khader
5	Sex	Male
6	Nationality	Indian

7	Passport details	No Passport
8	Occupation	Sales Man
9	Address (present)	R/o H.No. 114, 1 st Cross, BDA Complex, Austin Town, Bengaluru City, Karnataka State.
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Nil
13	Regular Criminal No.(If known)	Nil
14	Date of arrest	29-03-2012
15	Date of release on bail	Released on bail on 3.7.12
16	Under Act and Sections (of charge sheet)	U/s 489 (B), 489 (C) r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008)
17	Name(s) of bailer/suretias and Address	1. K. Rajkumar, S/o K S Yesudanam 26 years, [REDACTED]. 2. M D Khader, S/o late Sharifuddin, 62 years, [REDACTED].
18	Previous cases	Nil
19	Previous convictions with case Reference	Nil
20	Status of accused	Released on bail

5) **SHAIK AKRAM- A-27**

1	Name	Shaik Akram
2	Whether verified	Yes
3	Age	39 years

4	Father's name	Shaik Ahmad
5	Sex	Male
6	Nationality	Indian
7	Passport details	
8	Occupation	Cloth Business
9	Address (present)	R/o H.No. 167, Bharatinagar, Armstrong Road, Bengaluru City, Karnataka State.
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Nil
13	Regular Criminal No.(If known)	Nil
14	Date of arrest	29-03-2012
15	Date of release on bail	Not Released on bail
16	Under Act and Sections (of charge sheet)	U/s 489 (B), 489 (C) r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008)
17	Name(s) of bailer/sureties and Address	Not applicable
18	Previous Cases	Nil
19	Previous convictions with case Reference	Nil
20	Status of accused	In Judicial Custody

12. Particulars of the accused : NIL
Persons not charge sheeted

13. (i) Particulars of Witnesses examined : Separate list attached as Annexure-A

(ii) List of documents : Separate list attached as **Annexure-B**

(iii) List of articles : Separate list attached as **Annexure-C.**

14. If FIR is false, action taken : N.A

15. Result of laboratory analysis : Separate list attached as **Annexure-B**

16. BRIEF FACTS OF THE CASE:

16.1 On the credible information that one Morjen Hossain of Mohabatpur Village, Kaliachak PS limits, Malda Dist, West Bengal State and others were circulating Counterfeit Indian Currency Notes of denominations of Rs. 500/- and Rs. 1000/-, the mobile phone Numbers of Morjen Hossain and others were lawfully intercepted u/s 5 of The Indian Telegraph Act, 1885 after taking necessary permission from the Ministry of Home Affairs, Govt of India. The conversations that took place on the intercepted phones were recorded. From the said interception of mobile phones, it was revealed that Morjen Hossain, Rakib Sheik (who worked at Ramky Infrastructures (ORR Project), Patancheru, Medak Dist, Andhra Pradesh) and others formed into a group and indulged in smuggling of Counterfeit Indian Currency Notes having face value of Rs. 500/- and Rs. 1000/- from hostile country and circulation of the same in India as a part of larger conspiracy to destabilize the monetary system of India. Further, they were allegedly raising funds for

terrorist activities by way of earning genuine currency notes against the counterfeit currency notes circulated by them. The Government of India, Ministry of Home Affairs (Internal Security-I-Division), (IS-IV Desk) had given permission vide Order No. 11034/36/2011-IS-IV dated 28/12/2011 for registration of this case.

16-2 Accordingly a case in Cr. No. 1/2012/NIA/Hyd was registered against A-1 Morjen Hossain, A-2 Rakib Sheik and others U/s 489 (B), 489 (C) r/w 120-B IPC and Sections 15,17 and 18 of Unlawful Activities (Prevention) Act-1967.

16-3 The A-1 Morjen Hossain was arrested on 06-01-2012 in Malda District, West Bengal State and he confessed the offence. He revealed the names of other persons (apart from A-2 Rakib Sheik) involved in the crime and they were arrayed as A-3 to A-22. A-17 Mohammed @ Sheik @ Anwar @ Ashraf is a Pakistan National and he supplied Counterfeit Indian Currency Notes to A-18 Shareef Sheik, who is a Bangladesh National, for circulation in India. The A-18 Shareef Sheik in association with A-1 Morjen Hossain, A-19 Mohsin Sheik and others got the FICN smuggled into India and circulated the same.

16-4 While the case was under investigation, credible information was received to the effect that the above said A-17 Mohammed @ Sheik @ Anwar @ Ashraf, a Pakistan National presently residing in Dubai, was smuggling the Counterfeit Indian Currency Notes into India for circulation in association with one Masood Akhtar Ansari @ Nayeem resident of Bengaluru and one Imran of Delhi. Discreet enquiries were caused and it came to light that Masood Akhtar Ansari @ Nayeem sent a parcel containing

Counterfeit Indian Currency Notes from Bengaluru to Imran who was in Delhi. It further came to light that the said Imran would collect the parcel containing Counterfeit Indian Currency Notes from Patel Rail Cargo, Chandni Chowk in Delhi. Basing on the said information, NIA investigation team was rushed to Delhi. On 27-03-2012, in Delhi, two persons namely 1) Janab Hassan and 2) Imran came to Patel Rail Cargo and took the delivery of Parcel. The investigation team intercepted those two persons in the presence of two independent witnesses and got the said parcel opened. In the said parcel Counterfeit Indian Currency Notes amounting to Rs.9,85,000/- were found packed in a plastic bag of off white colour beneath the tea packets consisting of 17 numbers and the same were seized. They were arrested and arrayed as A-23 and A-24. The person, who sent the Counterfeit Indian Currency Notes from Bengaluru to A-23 and A-24, was identified as Masood Akthar Ansari @ Nayeem and he was arrayed as A-25. The A-25 is an associate of A-17 Mohammed @ Sheik @ Anwar @ Ashraf, who is a Pakistan National and is maintaining connections with A-1 Morjen Hossain also. The A-25 is procuring the Counterfeit Indian Currency Notes from A-17 and also from A1. The A-25 Masood Akhtar Ansari @ Nayeem was arrested on 29-03-2012 in Bengaluru. Five other associates of A-25, who are residents of Bengaluru, were also identified and they were arrayed as A-26 to A-30.

16-5 From the above it is revealed that the A-17 Mohammed @ Sheik @ Anwar @ Ashraf is a main supplier of Counterfeit Indian Currency Notes to the gang led by accused A-1 Morjen Hossain. The confession statement of A-25 Masood Akthar and the material documents recovered from A-24 Imran Khan @ Imran established

that these accused also hatched larger conspiracy to circulate Counterfeit Indian Currency Notes supplied by A-17-Mohammed @ Sheik @ Anwar @ Ashraf . The A-25 also confessed that he is keeping active contact with A-1.

16-6 The main source of supply of Counterfeit Currency Notes is A-17 and efforts are in progress to reach him to unearth the larger conspiracy and to curb his illegal activities of economic destabilization of the country.

16-7 Basing on the investigation done in this case so far, Charge Sheet was filed in respect of A-1 to A-6 and A-8 to A-14 on 30-06-2012 before this Hon'ble Court.

16-8 Investigation in respect of A-23 to A-27 has also been completed. The A-23 Janab Hassan and A-24 Imran were found in the possession of Counterfeit Indian Currency Notes amounting to Rs.9,85,000/- in Delhi, which was sent by A-25 Masood Akhtar Ansari @ Nayeem from Bengaluru.

16-9 This supplementary charge sheet is herewith filed in respect of A-23 Janab Hasan, A-24 Imran Khan, A-25 Masood Akhtar Ansari @ Nayeem, A-26 Mohammed Shafi and A-27 Shaik Akram before this Hon'ble Court.

17. FACTS DISCLOSED DURING THE INVESTIGATION:

17.1 During the course of investigation it is revealed that A-25 Masood Akhtar Ansari @ Nayeem who is originally a native of Mumbai where he used to do saree-dyeing and trading business. During those days, Banaras silk and fancy sarees were exported to Dubai. He used to export the sarees to Dubai and in that connection he came into contact with A-17 Mohammed @ Sheik @ Anwar @ Ashraf who is a citizen of Pakistan and said to be staying in Dubai. Thereafter the A-25 migrated to Bengaluru and started a Cloth Trading business in the name of "Al-Nishath collections" at Ibrahim Street in Bengaluru by paying rent to A-29 Chand Pasha, owner of the above said shop. A-29 is also doing the business of similar nature with different cloth material. A-25 was frequently in contact with A-17 - Mohammed @ Sheik @ Anwar @ Ashraf and discussed about the export of Sarees to Dubai. During the course of business transactions A-17 - Mohammed @ Sheik @ Anwar @ Ashraf told A-25 that if he entered in circulation of Counterfeit Indian Currency Notes in India, he would get profit of Rs. 50,000/- (original Indian currency) against one lakh Counterfeit Indian Currency Notes. The A-25 agreed to the proposal offered by A-17 and since then he used to receive the Counterfeit Indian Currency Notes from him and has been circulating the same in India. The A-25 used to send original Indian Currency (Proceeds of crime) of Rs. 50,000/-for each one lakh Counterfeit Indian Currency Notes to A-17 through Hawala route. As confessed by A-25, he was in contact with A-17 on his mobile No. 97XXXXXXX854 from his mobile No. 99XXXXXX221 and as well as from landline numbers.

17.2 It is also revealed that as per the instructions of A-17, the A-25 established contact over phone with A-24. The A-25 introduced himself to A-24 as **Nayeem** by concealing his original name. The A-25 used to send Counterfeit Indian Currency Notes to A-24 and he in turn circulated the same in UP and Delhi in association with A-23 Janab Hassan.

17.3 In the month of February 2012, the A-25 received a parcel from A-17 containing Counterfeit Indian Currency Notes amounting to Rs. 26,00,000/- in denominations of Rs 1000/- and Rs 500/- notes transported from Dubai via Chennai. In order to hide the Counterfeit Indian Currency Notes contained in the parcel, the same was covered with chocolates, shampoos, toys and dates.

17.4 After receiving the said parcel, the A-25 informed A-17 about the receipt of the parcel. Out of the 26 Lakhs of Counterfeit Indian Currency Notes, the A-25 gave Rs.3,10,000/- to his associate A-26 Mohammed Shafi, who is a resident of Bengaluru for circulation. The A-26 in turn gave Counterfeit Indian Currency Notes of Rs.1,00,000/- to A-27 Shaik Akram for circulation. The A-27 circulated the same in local market and paid genuine currency notes of Rs. 50,000/- to A-26 as proceeds of crime. The A-26 circulated the remaining Counterfeit Indian Currency Notes and paid proceeds of crime of Rs. 1,50,000/- to A-25. The A-25 also gave counterfeit Indian Currency Notes of Rs. 5,00,000/- for circulation to his another associate A-28, Anees who is resident of Bengaluru and doing Saree business. The A-28 in turn paid

Rs.2,50,000/- genuine currency to A-25 towards the crime proceeds. The A-25 sent Rs. 2.5 Lakhs genuine Indian currency notes to A-17 through hawala route, as a part payment towards the proceeds of circulation of Counterfeit Indian Currency Notes given by him.

17.5 In order to send the Counterfeit Indian Currency Notes to A-24 Imran Khan @ Imran, on 20-03-2012 the A-25 Masood Akhtar Ansari @ Nayeem with the help of A-28 Anees purchased Tea powder packets from the local market and kept the same in a dark brown cardboard box. The A-25 placed Rs. 9, 85,000/- Counterfeit Indian Currency Notes (all in Rs. 1000/- denomination) in a cream colour polythene cover and kept in the said cardboard box and packed it. Later A-25 told A-29 Chand Pasha and A-30 Rizwan Qureshi that the said parcel belonged to A-28 Anees and it was to be transported to his relatives in Delhi. The A-25 requested A-29 and A-30 to book the parcel at Patel Parcel Movers stating that he was unable to go to parcel office as he had some other work. Accordingly A-29 and A-30 booked the parcel at Patel Parcel Movers, Bengaluru on 20-03-2012 vide receipt No. 16297 dated 20/03/2012. On the said parcel the address of the receiver was mentioned as “KISAAN CHANDNI CHOWK DELHI Mob-84XXXXX798”. Sender’s address was mentioned as “KARNATAKA Tea Agencies, O.P.h. Road/SUC/Bg of Karnataka”. The original receipt given by Patel Parcel Movers was handed over to A-25 by A-29 and A-30. As per the receipt the weight of the parcel was 20 kgs and the amount collected was Rs. 240/- towards the transport charges. During the course of investigation, it was revealed that

Patel Parcel Movers installed CCTV recording system. The video footage of 20-03-2012 was seized and as per this, A-29 Chand Pasha and A-30 Rizwan Qureshi carried the parcel and booked the same on 20-03-2012 at about 6 PM. The statements of [REDACTED], Manager and [REDACTED], Parcel clerk of M/s Patel Parcel Movers Bengaluru, Karnataka State were recorded U/s 161 Cr.P.C.

17.6 On 21-03-2012, with a view to send the copy of the receipt given by Patel Parcel Movers to A-24 for enabling him to collect the parcel containing Counterfeit Indian Currency Notes, A-25 went to “[REDACTED]” in Bengaluru which deals with Computer Accessories repairs, fax, Xerox etc., located in the commercial complex called Ashok Plaza on the main Kamaraja Road in Bengaluru and requested its owner [REDACTED] to fax the original receipt No. 16297 dated 20/03/2012 to Delhi. Accordingly, [REDACTED] faxed the receipt to the phone number given by A-25. As the letters on the copy received through fax were not clear, the A-24 asked A-25 to send the receipt to the e-mail ID “[REDACTED]@gmail.com”. This e-mail belongs to one [REDACTED], proprietor of [REDACTED] Computers located at Tahsil compound area, Kairana, Prabhudhnagar, UP State. On the request of A-25, [REDACTED], owner of [REDACTED] Hitech Service scanned the receipt and sent it to the e-mail address [REDACTED]@gmail.com through his office e-mail ID “[REDACTED]@gmail.com”. [REDACTED] Computers proprietor, [REDACTED] took a printout of the receipt from the e-mail ID “[REDACTED]@gmail.com” and gave it to A-24.

During the course of investigation, Hard Disks of computers were seized from [REDACTED] Hi-tech Service, Bengaluru and [REDACTED] Computers, Kairana, Uttar Pradesh State. The statements of [REDACTED], proprietor of [REDACTED] Computers located at Tahsil compound area, Kairana, Prabudhnagar District, Uttar Pradesh State and [REDACTED], owner of [REDACTED] Hitech Service, Bengaluru, Karnataka State, were recorded U/s 161 Cr.P.C.

17.7 On 26-03-2012 [REDACTED], Regional Manager, Patel Rail Cargo, Chandni Chowk, Delhi made a call to mobile No. 84XXXXX798 (mentioned on the parcel sent by A-25) and informed that the parcel had arrived in Delhi from Bengaluru. On 27-03-2012, A-24 along with his half-brother A-23 went to Patel Rail Cargo, Delhi in the Indica DI Car bearing Reg. No. [REDACTED] [REDACTED] and collected the parcel containing Counterfeit Indian Currency Notes of Rs.9,85,000/- by presenting the scanned receipt sent by A-25 from Bengaluru. The A-24 signed on the delivery receipt No. 4095 dated 27/03/2012 of Patel Rail Cargo, Delhi for having received the parcel No. 16297/1. On the said delivery receipt, the signature of A-24 as 'Imran' in Hindi is found and he wrote his phone No. as "95XXXXX674". The said parcel was sent by A-25 by booking on 20-03-2012 at Patel Parcel Movers in Bengaluru. The said Counterfeit Indian Currency Notes of Rs. 9,85,000/- were seized from the possession of A-23 and A-24 in the presence of independent witnesses. Apart from this, a Counterfeit Indian Currency Note of Rs. 1000/- denomination vide Sl. No.JCA888302 was also found during personal search of A-24 and the same was seized at the time of his arrest on 27-03-2012. Another Counterfeit Indian Currency Note of Rs. 1000/-

denomination vide Sl. No.9BW 674802 was also found in possession of A-23 and the same was also seized. Statement of [REDACTED], Regional Manager, Patel Rail Cargo, Chandni Chowk, Delhi, was recorded U/s 161 Cr.P.C.

17.8 Investigation revealed that A-23 and A-24 used to circulate Counterfeit Indian Currency Notes in Uttar Pradesh and Delhi. Both of them were arrested on 27/03/2012.

17.9 The A-25 was arrested on 29-03-2012 by NIA, Hyderabad in Bengaluru and Counterfeit Indian Currency Notes having face value Rs. 21,500/- were seized from his house, at his instance. The original receipt No. 16297, dated 20-03-2012 issued by Patel Parcel Movers, Bengaluru in respect of the parcel containing Counterfeit Indian Currency Notes sent by A-25 to A-24 was also seized from the possession of A-25. In his confession, he revealed the names of his associates in Bengaluru and they were arrayed as A-26 Mohammed Shafi, A-27 Shaik Akram, A-28 Anees, A-29 Chand Pasha and A-30 Rizwan Qureshi. The A-25 also confessed that on earlier occasions he had received Counterfeit Indian Currency Notes of Rs 5,00,000 from A-1 and circulated the same.

17.10 The A-26 Mohammed Shafi took Counterfeit Indian Currency Notes of Rs. 3,10,000/- from his associate A-25. He in turn gave Rs.1, 00,000/- out of the same to A-27 for circulation. The A-27 circulated the same and gave genuine currency notes of Rs. 50,000/- to him as proceeds of crime. The A-26 circulated the remaining Counterfeit Indian Currency Notes and paid proceeds of

crime to the tune of Rs. 1, 50,000/- to A-25. The A-26 was arrested on 29-03-2012 in Bengaluru and Counterfeit Indian Currency Notes having face value of Rs.6,500/- were seized from his house in Bengaluru, at his instance.

17.11 The A-27 Shaik Akram took Counterfeit Indian Currency Notes Rs.1,00,000/- from A-26. The A-27 circulated the same and paid genuine Indian currency notes of Rs. 50,000/- to A-26 as proceeds of crime. The A-27 was arrested on 29-03-2012 by NIA, Hyderabad in Bengaluru and Counterfeit Indian Currency Notes having face value of Rs.4, 500/- were seized at his instance from his shop in Bengaluru.

18. CHARGE.

It is submitted that in order to unearth the larger conspiracy and to find out whether all the Counterfeit Indian currency notes flowing in Indian economy and counterfeit currency notes seized in cases abroad are of same quality and to find out its common characteristics, the samples were obtained officially from a case registered in Delhi by the Special Police, Delhi in Cr.No. 1/2012 (from CMM Court, Tis Hazari) and from Bangladesh and were subjected to comparison at Currency Note Press (Unit of SPMCIL), Nasik and it was reported that 1) Printing defects are similar, 2) The quality of Paper watermark and security thread, fluorescent fibres used as well as quality and process of printing have close resemblance to each other 3) The style, font, size of numbering and its process of printing in the counterfeit notes are similar 4) The level of counterfeiting is very high and these notes are printed on

high-end printing machines requiring huge capital investment. Based on the above observations it was concluded that the Counterfeit Indian Currency Notes of Rs. 500/- & Rs. 1000/- denomination are manufactured by the similar “modus operandi”.

The circulation of high value (denomination Rs. 500/- and Rs. 1000/-) and high quality Counterfeit Indian Currency Notes which are said to be printed in Pakistan and smuggled into India affected the Economic Security of India. The circulation of Counterfeit Indian Currency Notes in India tantamount to the damage of genuine currency notes (Property) which are printed by RBI for India and it resulted in the destabilization of monetary system of India. This is an offence U/s 16 of UA (P) Act 1967. The seized counterfeit Indian currency Notes were procured by the accused A-25 from A-17 Mohammed @ Sheik @ Anwar @ Ashraf, a Pakistan National, who is stationed in Dubai. These offences are committed as a part of criminal conspiracy to damage the property (Genuine currency notes) by circulating Counterfeit Indian Currency Notes and it is construed as an offence U/s 18 of UA (P) Act 1967.

Regarding the invoking of the provisions of Unlawful Activities (Prevention) Act-1967, the Reserve Bank of India opined that the Indian currency notes in physical form are the property of RBI i.e., Government of India. Indian Bank notes are paper currency and they hold their value because they are legal tenders of Government of India otherwise bank notes do not have any intrinsic value of their own. Since, Genuine Indian currency is the property of Govt. of India and large scale printing and smuggling of high quality high value Counterfeit Indian Currency Notes by a hostile

country (Pakistan) clearly damages the credibility of Indian Currency i.e., causes damage to the property of Indian State. Therefore, the act of large scale printing, smuggling and circulation of high value high quality Counterfeit Indian Currency Notes in an organised manner with the support of a hostile country comes within the definition of a terrorist act as per section 15(a) (iv) of UA (P) Act-1967.

18.1 Discussion of Evidence collected against A-23:Janab Hassan s/o Mir Hassan, aged 24 years, R/o Bura Village, Kairana Tahsil, Prabudhnagar District, Uttar Pradesh State:-

He conspired with other accused and circulated high quality and high value Counterfeit Indian Currency Notes, which affected the security of India. On 27-03-2012 he along with A-24 Imran Khan @ Imran took the delivery of the parcel containing Counterfeit Indian Currency Notes having face value of Rs. 9,85,000/- from Patel Rail Cargo, New Delhi. Apart from this a Counterfeit Indian Currency Note having face value of Rs. 1,000/- Sl. No. 9BW 674802 was recovered from his possession.

Hence he committed the offences U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Evidence (Documentary and Material):-

1. Seizure memo dt 27/03/2012.

2. Seizure of Fake Indian Currency Notes having face value of Rs. 9,85,000/- from the joint possession of A-23 and A-24.
3. Fake Indian Currency Notes Rs. 1,000/- Sl. No. 9BW 674802 seized from his possession at the time of his arrest on 27-3-2012.
4. 17 packets of plastic bags containing tea powder seized from A-23 & A-24 along with the Counterfeit currency notes.
5. Off white plastic bag used for packing Counterfeit currency notes.
6. Report vide Letter No. 39/Dy.No.202/12/991 dated 03/05/2012 of [REDACTED], Assistant Manager (Tech) for General Manager, Currency Note Press, Nasik (Unit of SPMCIL) Govt. of India). It confirmed that the Rs. 9,85,000/- currency seized in respect of the accused A-23 & A-24, are counterfeit currency notes. Similarly the Fake Indian Currency Note denomination Rs. 1,000/- Sl No. 9BW 674802 found on the person of A-23, is confirmed as counterfeit currency note.
7. Report vide Letter No. 39/FD/Corr/152 dated 02/03-05-2012 of [REDACTED], Asst. Manager (Technical) For General Manager, Currency Note Press, Nashik Road as required for comparison of Fake Indian Currency Notes (FICNs) seized on different dates are compared with notes by using modern scientific instruments & application of expertise in security printing. The expert opinion is as follows. The

quality of paper, watermark & security thread, fluorescent fibers used as well as quality & process of printing have close resemblance to each other. The style, font, size of numbering & its process of printing in the counterfeits is similar. The level of counterfeiting is very high & these notes are printed on high end printing machines requiring huge capital investment. Based on the above observations, it is concluded that the FICNs of Rs. 500/- & Rs. 1000/- denominations are manufactured by the similar “modus operandi”.

18.2 Discussion of Evidence collected against A-24: Imran Khan @ Imran s/o Manzoor Ali, aged 25 years, R/o Bura Village, Kairana Tahsil, Prabudhnagar District, Uttar Pradesh State:-

He conspired with other accused and circulated high quality and high value Fake Indian Currency Notes, which affected the security of India. On 27-03-2012 he along with A-23 Janab Hassan took the delivery of the parcel containing Fake Indian Currency Notes having face value Rs. 9,85,000/- from Patel Rail Cargo, New Delhi by signing on the delivery receipt. Apart from this a Fake Indian Currency Note having face value Rs. 1,000/- Sl. No. No.JCA888302 was recovered from his possession.

Hence he committed the offences U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Evidence (Documentary and Material):-

1. Seizure memo dt 27/03/2012.
2. Seizure of Fake Indian Currency Notes having face value of Rs. 9,85,000/- from his possession on 27/03/2012 in Delhi.
3. Fake Indian Currency Notes Rs. 1,000/- Sl. No. No.JCA888302 seized from his possession at the time of his arrest on 27-3-2012.
4. Scanned copy of receipt No. 16297 dated 20/03/2012 issued by Patel Parcel Movers, Bengaluru, seized from the possession of A-24 on 27/03/2012.
5. Delivery receipt no. 4095 dated 27/03/2012 of Patel Rail Cargo, New Delhi, seized from the possession of A-24 Imran Khan @ Imran.
6. Delivery receipt no. 4095 dated 27/03/2012 of Patel Rail Cargo, New Delhi in respect of receipt of parcel no. 16297/1 by A-24 Imran Khan @ Imran, seized from Patel Rail Cargo, New Delhi. On the said delivery receipt, the signature of A-24 Imran in Hindi, is found and written his phone no. as "95XXXXX674".
7. Delivery Register of Patel Rail Cargo, Chandni Chowk, Delhi.
8. 17 packets of plastic bags containing tea powder seized from A-23 & A-24 along with the Counterfeit currency notes.

9. Off white plastic bag used for packing Counterfeit currency notes.
10. Report vide Letter No. 39/Dy.No.202/12/991 dated 03/05/2012 of [REDACTED], Assistant Manager (Tech) for General Manager, Currency Note Press, Nasik (Unit of SPMCIL) Govt. of India). It confirmed that the Rs. 9,85,000/- currency seized in respect of the accused A-23 & A 24 are counterfeit currency notes. Similarly the Fake Indian Currency Note denomination Rs. 1,000/- Sl No. 9BW 674802 found on the person of A-24, is confirmed as counterfeit currency note.
11. Report vide Letter No. 39/FD/Corr/152 dated 02/03-05-2012 of [REDACTED], Asst. Manager (Technical) For General Manager, Currency Note Press, Nashik Road as required for comparison of Fake Indian Currency Notes (FICNs) seized on different dates are compared with notes by using modern scientific instruments & application of expertise in security printing. The expert opinion is as follows. The quality of paper, watermark & security thread, fluorescent fibers used as well as quality & process of printing have close resemblance to each other. The style, font, size of numbering & its process of printing in the counterfeits is similar. The level of counterfeiting is very high & these notes are printed on high end printing machines requiring huge capital investment. Based on the above observations, it is concluded that the FICNs of Rs. 500/- & Rs. 1000/- denominations are manufactured by the similar “modus operandi”.

12. CDRs of mobile Nos. 1) 95XXXXXX674 (A-24 Imran wrote this number on the delivery receipt of Patel Rail Cargo, Delhi), 2) 917XXXXXX369 (Through this number A-24 was in contact with A-17 Mohammed @ Sheik @ Anwar @ Ashraf a Pakistani National on phone No. 971XXXXXX854), 3) 84XXXXXX798 (this number was also used by A-24 and this number was found mentioned on the parcel sent by A-25).

18.3 Discussion of Evidence collected against A-25: Masood Akhtar Ansari @ Nayeem s/o Waheedur Raheman aged 51 years, R/o H.No.26/1, B Cooks Road, B2 Timmaiah Road Cross, Bengaluru City, Karnataka State:-

He conspired with other accused and circulated high quality and high value Fake Indian Currency Notes procured from A-17 Mohammed @ Sheik @ Anwar @ Ashraf a Pakistan National, which affected the security of India. He sent a parcel containing Counterfeit Indian Currency Notes value of Rs. 9, 85,000/- from Bengaluru to A-24 Imran Khan @ Imran who was in Delhi by booking on 20-03-2012 at Patel Parcel Movers, Bengaluru. At the time of his arrest on 29-03-2012, Counterfeit Indian Currency Notes having face value of Rs. 21,500/-were recovered from his house at his instance.

Hence he committed the offences U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Evidence (Documentary and Material):-

1. Original receipt No. 16297 dated 20/03/2012 issued by Patel Parcel movers, Bengaluru, seized from possession of A-25 on 29-03-2012.
2. Seized Carton containing Fake Indian Currency Notes Rs. 9,85,000/- on 27/03/2012 from the possession of A-23 and A-24 in Delhi, sent by A-25 by booking on 20/03/2012 at Patel Parcel Movers in Bengaluru, Karnataka State.
3. Seizure of Fake Indian Currency Notes of Rs. 21,500/-on 29/03/2012 from the house of A-25 on his confession.
4. Report vide Letter No. 39/Dy.No.202/12/991 dated 03/05/2012 of [REDACTED], Assistant Manager (Tech) for General Manager, Currency Note Press, Nasik (Unit of SPMCIL) Govt. of India). It confirmed that the Rs. 21,500/- currency seized in respect of the accused A-25, are counterfeit currency notes.
5. Report vide Letter No. 39/FD/Corr/152 dated 02/03-05-2012 of [REDACTED], Asst. Manager (Technical) For General Manager, Currency Note Press, Nashik Road as required for comparison of Fake Indian Currency Notes (FICNs) seized on different dates are compared with notes by using modern scientific instruments & application of expertise in security printing. The expert opinion is as follows. The quality of paper, watermark & security thread, fluorescent fibers used as well as quality & process

of printing have close resemblance to each other. The style, font, size of numbering & its process of printing in the counterfeits is similar. The level of counterfeiting is very high & these notes are printed on high end printing machines requiring huge capital investment. Based on the above observations, it is concluded that the FICNs of Rs. 500/- & Rs. 1000/- denominations are manufactured by the similar “modus operandi”.

6. CDR of Mobile No. 99XXXXXX221, which proves his association with A-17 Mohammed @ Sheik @ Anwar @ Ashraf a Pakistan National, (971XXXXXX854) and other accused.

7. The hard disc (SEAGATE) Size 500 GB, serial no-Z2ANB8NA, Firmware-JC4B, Datacode-12344, date of manufacture 2/2012 seized from the Digital video recorder H.264, Serial no-1111012874, model no E-DR4, make: ENTER installed in the Patel Parcel Movers, Bengaluru (this hard Disc contains video footage regarding the booking of the parcel containing FICN by A-29 Chand Pasha and A-30 Rizwan Qureshi on the instructions of A-25 Masood Akhtar Ansari @ Nayeem on 20-03-2012).

8. The hard disc (SEAGATE) Size 80 GB, serial no-51r8z5gm,-ATA-ST-3802110A seized from the computer of “██████████ Hi-tech Service”, Bengaluru. It contained the scanned parcel receipt No. No. 16297 dated 20/03/2012 pertaining to the parcel containing Fake Indian Currency Notes, issued by Patel Parcel movers, Bengaluru. This receipt is available in the e-mail ID of ██████████ Hi-tech Service “██████████@gmail.com”. This receipt was e-mailed to “██████████@gmail.com”.

11. Seagate 500GB SATA Hard disk having Serial No.6VM7DKZA whose MD5 hash value is “3E9FAD68423A50E1E4726FF179BBAF31” & SHA-1 hash value is “D2202E9778CD46EB28A02C320771B3CD6865AE1F” and for No.2 hard disk having Serial Number 4QE036P8 and 250GB capacity whose MD5 hash value is “756B681451AF2C49C039D78CA263C648” & SHA-1 hash value is “3E30B52A9773BC7815BBF5EF3E969197A6150264” seized from the ██████████ Computers Tahsil Compound Kairana, Uttar Pradesh State.
12. 17 packets of plastic bags containing tea powder seized from A-23 & A-24 along with the Counterfeit currency notes sent by A-25.
13. Off white plastic bag used for packing Counterfeit currency notes.

18.4 Discussion of Evidence collected against A-26: Mohammed Shafi s/o Abdul Khader, aged 25 years, R/o H No 114, 1st Cross, BDA Complex, Austin Town, Bengaluru, Karnataka State:-

He conspired with other accused and circulated high quality and high value Fake Indian Currency Notes, which affected the security of India. He took Fake Indian Currency Notes Rs. 3,10,000/- from his associate A-25 Masood Akhtar Ansari @ Nayeem. He in turn gave Fake Indian Currency Notes of

Rs.1,00,000/- to A-27 Shaik Akram for circulation. The A-27 circulated Fake Indian Currency Notes and gave genuine currency notes of Rs. 50,000/- to him as proceeds of crime. He circulated the remaining Fake Indian Currency Notes and paid proceeds of crime to the tune of Rs. 1,50,000/- to A-25. At the time of his arrest on 29-03-2012, Fake Indian Currency Notes having face value Rs. 6,500/-were recovered from his house at his instance.

Hence he committed the offences U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Evidence (Documentary and Material):-

1. Seizure of Fake Indian Currency Notes of Rs. 6,500/- on 29/03/2012 from the house of A-26 at his instance.
2. Report vide Letter No. 39/Dy.No.202/12/991 dated 03/05/2012 of [REDACTED], Assistant Manager (Tech) for General Manager, Currency Note Press, Nasik (Unit of SPMCIL) Govt. of India). It confirmed that the Rs. 6,500/- currency seized in respect of the accused A-26, are counterfeit currency notes.

1. 3. Report vide Letter No. 39/FD/Corr/152 dated 02/03-05-2012 of [REDACTED], Asst. Manager (Technical) For General Manager, Currency Note Press, Nashik Road as required for comparison of Fake Indian Currency Notes (FICNs) seized on different dates are compared with notes by using modern scientific instruments & application of expertise in security printing. The expert opinion is as follows. The quality of paper, watermark & security thread, fluorescent fibers used as

well as quality & process of printing have close resemblance to each other. The style, font, size of numbering & its process of printing in the counterfeits is similar. The level of counterfeiting is very high & these notes are printed on high end printing machines requiring huge capital investment. Based on the above observations, it is concluded that the FICNs of Rs. 500/- & Rs. 1000/- denominations are manufactured by the similar “modus operandi”.

18.5 Discussion of Evidence collected against A-27: Shaik Akram s/o Shaik Ahmad, aged 37 years, R/o H.No. 167, Baratinagar, Armstrong Road, Bengaluru, Karnataka State:-

He conspired with other accused and circulated high quality and high value Counterfeit Indian Currency Notes, which affected the security of India. He took Counterfeit Indian Currency Notes of Rs.1,00,000/- from A-26 Mohammed Shafi. He circulated Counterfeit Indian Currency Notes and paid genuine Indian currency notes Rs. 50,000/- to A-26 as proceeds of crime. At the time of his arrest on 29-03-2012, Counterfeit Indian Currency Notes having face value of Rs. 4,500/-were recovered from his shop at his instance.

Hence he committed the offences U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Evidence (Documentary and Material):-

1. Seizure of Counterfeit Indian Currency Notes of Rs. 4,500/- on 29/03/2012 from his shop at his instance.
2. Report vide Letter No. 39/Dy.No.202/12/991 dated 03/05/2012 of [REDACTED], Assistant Manager (Tech) for General Manager, Currency Note Press, Nasik (Unit of SPMCIL Govt. of India). It confirmed that the Rs. 4,500/- currency seized in respect of the accused A-27, are counterfeit currency notes.
3. Report vide Letter No. 39/FD/Corr/152 dated 02/03-05-2012 of [REDACTED], Asst. Manager (Technical) For General Manager, Currency Note Press, Nashik Road as required for comparison of Fake Indian Currency Notes (FICNs) seized on different dates are compared with notes by using modern scientific instruments & application of expertise in security printing. The expert opinion is as follows. The quality of paper, watermark & security thread, fluorescent fibers used as well as quality & process of printing have close resemblance to each other. The style, font, size of numbering & its process of printing in the counterfeits is similar. The level of counterfeiting is very high & these notes are printed on high end printing machines requiring huge capital investment. Based on the above observations, it is concluded that the FICNs of Rs. 500/- & Rs. 1000/- denominations are manufactured by the similar “modus operandi”.

From the above facts it is established that the accused A-23 to A-27 in pursuance to the criminal conspiracy with A-17 Mohammad @ Sheik @ Ashraf and with the intention to destabilize the monetary system of India affecting the internal and economic security and to cause destruction of genuine currency notes owned by the Government of India and to get unlawful monetary gain by circulation of Counterfeit Indian Currency notes as genuine currency notes, smuggled Counterfeit Currency Notes of Rs. 26 Lakhs from A-17 Mohammad @ Sheik @ Ashraf, who is belonging to Pakistan into India by A-25 Masood Akhtar Ansari @ Nayeem and transported Counterfeit Indian Currency Notes of Rs. 9,85,000/- to A-23 and A-24 through Patel Parcel Service of Bengaluru by way of parcel on 20.03.2012 after the circulation of the rest of the amount through A-26 Mohammad Shafi and A-27 Sheik Akram and by A-25 himself as genuine currency notes and by receiving the said parcel with a view to circulate it as genuine currency notes by A-23 Janab Hassan and A-24 Imran, all the accused have wilfully caused the destruction of value of genuine Indian currency notes and also affected the internal and economic security of India and thereby all the accused have committed the offence u/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

Sanction Order for the prosecution of A-23 Janab Hassan, A-24 Imran Khan @ Imran, A-25 Masood Akhtar Ansari @ Nayeem, A-26 Mohammed Shafi and A-27 Shaik Akram Under

Sections 489-B, 489 -C r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008), has been obtained vide the order No. 1-1034/36/2011-IS-IV of under Secretary to Govt of India, Internal Security-I Division, Ministry of Home Affairs, New Delhi.

Hence, it is prayed that this Hon'ble Court may be pleased to take cognizance against the following accused and they may be tried and punished U/s 489 (B), 489 (C), r/w 120 B of IPC and Sections 16 & 18 of Unlawful Activities (Prevention) Act, 1967 (as Amended in 2008).

- 1) A-23- Janab Hassan, s/o Mir Hassan.
- 2) A-24- Imran Khan @ Imran, s/o Manzoor Ali.
- 3) A-25- Masood Akhtar Ansari @ Nayeem, s/o Waheedur Raheman.
- 4) A-26- Mohammed Shafi, s/o Abdul Khader.
- 5) A-27-Shaik Akram, s/o Shaik Ahmad.

Investigation in respect of all other accused namely A-7 Mallikarjun Baswanappa Pallapur, A-15 Rajeeb Sheik, A-16 Bablu Seikh, A-17 Mohammed @ Sheik @ Anwar @ Ashraf, A-18 Shareef Sheik, A-19 Mohsin Sheik, A-20 Parasuram, A-21 Mustafa Ali Buddan, A-22 Surja Jamal, A-28 Anees, A-29 Chand Pasha and A-30 Rizwan Qureshi of this case is being continued and report U/s 173 Cr.P.C. will be submitted soon after the completion of investigation.

19. Despatched on : 31-8-2012

20. No. of enclosures :

21. List of enclosures : Annexure A (List of Witnesses)
Annexure B (List of Documents)
Annexure C (List of Material Objects)

Signature of the Investigating Officer
Submitting the Charge Sheet


Addl. Superintendent of Police
NIA, Hyderabad

Forwarded by-
Superintendent of Police,
National Investigation Agency
Hyderabad