



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

**SUPPLEMENTARY CHARGE SHEET
(Under Section 173 Cr. P.C.)**

**BEFORE THE HONOURABLE SPECIAL COURT FOR N.I.A
CASES (XLIX ADDITIONAL CITY CIVIL & SESSIONS COURT)
BANGALORE, KARNATAKA**

STATE

V/s

SHOAIB AHAMED MIRZA @ CHOTU AND OTHERS

- 1 Name of the Branch** : National Investigation Agency,
Hyderabad
- FIR No.** : RC 04/2012/NIA/HYD
- Year** : 2012
- Date** : 25.11.2012
- 2. FinalReport/
Charge Sheet No.** : Supplementary Charge Sheet No. 3

- 3 Date** :2014
- 4 Sections of Law** : U/s 120B r/w sections 153A, 399 IPC, and section 18 read with sections 10, 13, 17, and 38 of the Unlawful Activities (Prevention) Act, 1967. Section 3 r/w section 25 of the Arms Act 1959.
- 5 Type of Final Report** : Supplementary 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
- 8 Name of Investigating Officers** **of** : 1.Shri A.G.Kaiser,
Dy.Superintendent of Police, NIA,
Hyderabad (Previous).
2.Shri K. Sunil Emmanuel IPS,
SP NIA, Hyderabad (Previous)
3.Shri A.G.Kaiser,
Dy.Superintendent of Police, NIA,
Hyderabad (Present).
- 9 Name of the Complainants/ Informants** : Sri.K.N.Jithendranath,ACP (Special Enquiries), City Crime Branch, Bangalore City, Karnataka.

10 **Details of properties/ Articles /Documents Recovered/ seized during Investigation and relied Upon.** : As per list attached

11.PARTICULARS OF ACCUSED PERSONS CHARGE SHEETED:

1)Dr.Imran Ahmed(A-22)

1	Name	Dr.Imran Ahmed
2	Whether verified	Yes
3	Age	35 years
4	Father's name	Late Mumtaz Ahmed
5	Sex	Male
6	Nationality	Indian
7	Passport details	J7064053 issued at Bangalore
8	Occupation	Doctor
9	Address (present)	████████████████████ ████████████████████ ████████████████████ ████████████████████
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No.	Not known
13	Regular Criminal No.(If known)	Not known
14	Date of arrest	28.11.2013
15	Date of release on bail	Not applicable
16	Under Act and Sections (ofcharge sheet)	Under Section 12(1)(b) of the Passport Act.

17	Name(s) of bailer/ sureties and Address	Not applicable
18	Previous Cases	Not known
19	Previous convictions with case Reference	Not known
20	Status of accused	In judicial custody at Central Prison, Bangalore

2)S.M.Ahamedullah (A-26)

1	Name	S.M.Ahamedullah
2	Whether verified	Yes
3	Age	67 years
4	Father's name	Ibrahim
5	Sex	Male
6	Nationality	Indian
7	Passport details	No passport
8	Occupation	Passport Agent
9	Address (present)	[REDACTED]
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Not known
13	Regular Criminal No.(If known)	Not known
14	Date of arrest	04.12.2013
15	Date of release on bail	On 17.03.2014.
16	Under Act and Sections (of charge sheet)	Under Section 12(2) of the Passport Act,1967
17	Name(s) of bailer/ sureties and Address	1. Andanaih S B s/o Late Doddaboregowda r/o 2. Shankarappa s/o Siddalingappa, r/o

18	Previous Cases	Not known
19	Previous convictions with case Reference	Not known
20	Status of accused	Accused released on court bail.

3) Rizwan Ahmed(A-27)

1	Name	Rizwan Ahmed
2	Whether verified	Yes
3	Age	40 years
4	Father's name	Saban Sab
5	Sex	Male
6	Nationality	Indian
7	Passport details	No passport
8	Occupation	Real Estate Agent
9	Address (present)	████████████████████ ████████████████████ ██████████
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Not known
13	Regular Criminal No.(If known)	Not known
14	Date of arrest	Not Arrested
15	Date of release on bail	Not applicable
16	Under Act and Sections (ofcharge sheet)	Under Section 465 read with 34, 466 IPC & Section 12(2) of the Passport Act.
17	Name(s) of bailer/ sureties and Address	Not applicable
18	Previous Cases	Not known
19	Previous convictions with case Reference	Not known
20	Status of accused	Not arrested.

4) Babu Narendra Prasad(A-28)

1	Name	Babu Narendra Prasad
2	Whether verified	Yes
3	Age	40 years.
4	Father's name	V.R.Shetty
5	Sex	Male
6	Nationality	Indian
7	Passport details	No passport
8	Occupation	Graphical designer
9	Address (present)	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
10	Address(Permanent)	Same as above
11	Whether verified	Yes
12	Provisional Criminal No	Not known
13	Regular Criminal No.(If known)	Not known
14	Date of arrest	Not arrested.
15	Date of release on bail	Not Arrested
16	Under Act and Sections (ofcharge sheet)	Under Section 465 read with 34, 466 IPC & Section 12(2) of the Passport Act.
17	Name(s) of bailer/ sureties and Address	Not applicable
18	Previous Cases	Not known
19	Previous convictions with case Reference	Not known
20	Status of accused	Accused released on court bail as per the order of NIA Special Court, Bangalore.

12. Particulars of the accused persons not charge sheeted:

- NA-

13. (i) Particulars of

Witnesses examined : Separate list attached as
Annexure-I

(ii) List of Articles : Separate list attached as
Annexure-II (List of documents)

14. If FIR is false, action taken: Not Applicable

15. Result of laboratory analysis : Cyber Forensic Expert Report of some gadgets yet to be received

16. BRIEF FACTS OF THE CASE:

16.1 The City Crime Branch, Bangalore received credible information that members of the banned terrorist organizations Lashkar-E-Taiba (**L-e-T**) and Harkat-ul-Jihad-E-Islami (**HuJI**) have hatched a conspiracy to indulge in subversive activities like target killings of important personalities of Hindu community in Bangalore and Hubli and thereby to disturb the communal harmony. They were also in possession of illegal fire arms and ammunition to carry out their desired objective and wage war against the Government of India.

16.2 Surveillance was arranged by CCB, Bangalore City Police over the activities of the suspected members at Hubli and Bangalore and finally on 29.08.2012 the accused Shoaib Ahamed Mirza @ Chotu (**A-1**) and Abdul Hakeem Jamadar (**A-2**) were arrested with possession of illegal weapon when they had reached near the house where their target [REDACTED] a daily news paper used to visit. Subsequently other accused were also arrested and a case was registered in Basaveshwara Nagar Police Station as Crime.No.384/2012 under sections 120B, 121, 121A, 122, 153A, 153B, 307, 379 IPC and sections 3 & 25 of the Arms Act, 1959 and sections 10, 12, & 13, of the Unlawful Activities (Prevention)

Act, 1967 on the complaint of Shri K.N.Jithendranath, ACP, Bangalore City, Karnataka on 29.08.2012.

16.3 The investigation disclosed the widespread L-e-T supported network of terrorists based in Saudi Arabia, Pakistan and their associates in India in the States of Karnataka, Andhra Pradesh and Maharashtra and their conspiracy to commit terrorist activities in India. It is also found during the investigation that a larger conspiracy was hatched by the accused in Riyadh and Dammamin Kingdom of Saudi Arabia. In furtherance of the conspiracy hatched by them, the accused persons decided to kill the selected targets i.e. prominent right wing politicians, police officers and journalists in Bangalore, Hubli, Hyderabad and Nanded.

16.4 Having regard to the gravity and seriousness of the case and considering the international ramifications of the case, the Government of India passed orders to transfer the case to National Investigation Agency (NIA) for investigation. As per the orders of Ministry of Home Affairs, Govt of India vide No.1-11011/55/2012-IS-IV dated 16th November, 2012, National Investigation Agency took over the investigation of the above case and re-registered the same as RC No. 04/2012/NIA/HYD and the case was investigated by NIA Field Office, Hyderabad.

17. FACTS DISCLOSED DURING THE INVESTIGATION;

17.1 Investigation conducted by the Karnataka Police and the NIA has revealed that some members of the banned terrorist organizations LeT/HuJI based in Saudi Arabia and Pakistan hatched a conspiracy to carry out target killings in Bangalore, Hubli, Hyderabad and Nanded with the help of their operatives in Karnataka, Andhra Pradesh and Maharashtra.

Dr Imran Ahmed (A-22) in the year 2011 had obtained passport fraudulently by enclosing his forged voter id card bearing the false address of Mysore City. The forged voter id card was prepared and obtained with the help of accused S M Ahmedullah(A-26), Rizwan Ahmed(A-27) and Babu Narendra Prasad(A-28) and had paid a sum of Rs.50,000/- for the purpose.

In pursuance of the said criminal conspiracy, Mohammed Akram (A-7) had visited Riyadh, KSA at the instance of Abdul Majeed (A-19). He had arranged for the passport, VISA and other travel documents for Akram (A-7) in Riyadh. In KSA Akram(A-7) came in contact with L-e-T operatives Mohammed Shaheed Faisal@Zakir@Ustad(A-13), Mohammed Bhai (A-16), Dr Usmane Ghani Khan (A-18), Abdul Majeed(A-19) and Dr Imran Ahmed(A-22). In pursuance of the conspiracy, Dr Imran Ahmed (A-22) and Mohammed Akram (A-7) stayed together in a flat rented by [REDACTED] who is a cousin of accused Abdul Majeed (A-19) in Riyadh for 40 days. During the period, Dr Imran (A-22) motivated him towards jihadi activities and take up subversive activities in India under the direction and supervision of the other accused persons in India.

The accommodation in the flat of [REDACTED] at Riyadh was provided by Mohammed Bhai (A-16) and Mohammed Shaheed Faisal @Zakir @Ustad(A-13). Dr Imran Ahmed stayed in the flat for a period of 4 months. During his stay in Riyadh, he participated in conspiracy meetings held at different places along with 1. Mohammad Bhai (A-16) 2. Abu Sufiyan 3. Abdul Majeed(A-19) 4. Abu Hanzala.

Investigation conducted so far has disclosed that **S M Ahmedullah @Iqbal (A-26)** without lawful authority, fraudulently caused the preparation of fake voter ID card for Dr. Imran Ahmed (A-22) with the help of Rizwan Ahmed(A-27) and Babu Narendra Prasad(A-28) and after obtaining the said voter ID card he had helped Dr. Imran Ahmed (A-22) to submit his application for renewal of Passport under Tatkal Scheme by producing the fake voter ID along with other documents at the Passport Seva Kendra, Bangalore. Thereby abetting Dr.Imran to Disclose false information by using a forged document as genuine and

suppressing material information with a view to obtain the passport.

Investigation conducted so far has disclosed that **Rizwan Ahmed (A-27)** at the instance of S M Ahmedullah (A-26) with an intention of earning some extra money helped Dr Imran Ahmed in getting a fake voter identity card, he also provided the information and the photographs of Dr Imran Ahmed for the purpose of forging a election voter ID card to Babu Narendra Prasad. Babu Narendra Prasad was introduced to him by his friend [REDACTED]. Rizwan also affixed the hologram on the forged voter ID card prepared for Dr Imran Ahmed by Babu Narendra Prasad (A-28); he used the same fake voter for ID collecting the passport personally by hand at the [REDACTED] to help Dr Imran Ahmed in fraudulently obtaining his passport. Thereby, abetted Dr Imran to fraudulently obtain his passport by using the forged document as genuine.

Investigation conducted so far has disclosed that **Babu Narendra Prasad (A-28)** was approached by Rizwan(A-27) using the reference of [REDACTED] to help him . At the instance of Rizwan Ahmed (A-26), he forged voter ID card using the photograph and address particulars of Dr Imran Ahmed (A-22) provided by Rizwan Ahmed (A-26) using computer graphics. This forged voter ID card prepared by him was later used by Dr Imran Ahmed (A-22) to fraudulently obtain his passport by using the forged document as genuine. Thereby, abetting the offence.

18. CHARGE.

18.1 The accused **Dr Imran Ahmed @Immu Bhai (A-22)** wantonly obtained a passport having false address in Mysore with the help of his co-accused by obtaining a forged voter id card using the same as genuine document to obtain his passport fraudulently. Therefore, it is recommended that he may be prosecuted under section 12 (1)(b) of the Passport Act 1967.

18.2 Accused **S M Ahmedullah @Iqbal (A-26)** with the help of other accused Rizwan Ahmed (A-27) for monetary gain has facilitated Dr. Imran by providing a forged voter ID card. The forged voter ID card was later used by them in obtaining passport of Dr Imran Ahmed fraudulently by using the forged document as genuine. Therefore, it is recommended that he may be prosecuted under section 12 (2) of the Passport Act.

18.3 Accused **Rizwan Ahmed (A-27)** after receiving money from Ahmedullah(A-26) has facilitated in obtaining a forged voter ID card which was forged by Babu Narendra Prasad(A-28) at his instance. He had also provided the photograph and address particulars of Dr. Imran for the purpose of forging the voter ID card. On his repeated request to help, [REDACTED] had referred him to Babu Narendra Prasad (A-28). Rizwan also affixed the hologram on the forged voter ID card prepared for Dr Imran Ahmed by Babu Narendra Prasad (A-28), he has also used the same for collecting the passport personally by hand at the [REDACTED] to help Dr Imran Ahmed in fraudulently obtaining his passport. Thereby, abetted Dr Imran to fraudulently obtain his passport by using the forged document as genuine.. Therefore it is recommended that he may be prosecuted under section 465 read with 34, 466 IPC; and section 12 (2) of the Passport Act.

18.6 Accused **Babu Narendra Prasad (A-28)** was approached by Rizwan(A-27) using the reference of [REDACTED] to help him . At the instance of Rizwan Ahmed (A-26), he forged voter ID card using the photograph and address particulars of Dr Imran Ahmed (A-22) provided by Rizwan Ahmed(A-26) using computer graphics. This forged voter ID card prepared by him was later used by Dr Imran Ahmed (A-22) to fraudulently obtain his passport by using the forged document as genuine. Therefore it is recommended that he may

be prosecuted under section 465 read with 34, 466 of IPC; and 12 (2) of the Passport Act.

18.7 The sanction for prosecution under section 15 of the Passport Act, 1967 has been accorded by Joint Secretary/ (PSP) & Chief Passport Officer, Ministry of External Affairs, Govt. Of India, New Delhi vide order No.VI/401/1/7/2014 dated 18th June 2014 and is enclosed in original.

18.8 That further investigation is inevitable against the arrested accused Dr. Imran @ Immu (**A-22**) and the absconding accused viz Mohammad bhai @ Abdul Bari @ Abu Hamza (**A-16**), Abu Saad @ Furkhan Bhai @ Abdulla @ Masood (**A-17**), Usmane Ghani Khan @ Dr. Usman Ghani @ Abu Anas (**A-18**), Mohammed Abdul Majeed @ Abdul Majeed Mohammed (**A-19**), Abdul Rehman @ Farhathullah Ghorri (**A-20**), Motu Doctor (**A-21**), Siddiq Bin Osman @ Abu Hanzala @ Saber (**A-23**), and Asad Khan @ Abu Sufiyan @ Asadullah Khan (**A-24**). Further investigation is also unavoidable to unearth the larger conspiracy and for collecting additional evidence against the accused persons who are charge sheeted. Additional witness list and documents list will be filed in due course.

18.9. It is, therefore, prayed that this Hon'ble Court may be pleased to take cognizance against accused mentioned in Column Number 11 to be prosecuted for offences as under:

-U/s 12 (1)(b) of the Passport Act 1967 against **A-22**,

-U/s 12 (2) of the Passport Act against **A-26**,

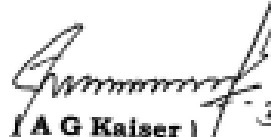
- U/s 465 read with 34, 466 IPC; and section 12 (2) of the Passport Act against **A-27**,

- U/s 465 read with 34, 466 IPC; and section 12 (2) of the Passport Act against **A-28**.

It is also prayed that further investigation u/s 173 (8) Cr.PC against the accused, arrested/absconding may be permitted for the ends of justice.

19. Despatched on : 31/07/14
20. No. of enclosures : 03
21. List of enclosures : 1. Annexure I (List of Witnesses)
2. Annexure II
(List of Documents)
3. Sanction for Prosecution -01
No. (Original)

Signature of the
Investigating Officer
submitting the Final Report


(A G Kaiser) - 31/7/14
Dy Superintendent of Police
NIA /Hyderabad.

Forwarded by DIG/NIA



(Dr. A. Ravishankar IPS)
Deputy Inspector General
NIA /Hyderabad.