



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

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

**IN THE HON'BLE SPECIAL COURT CONSTITUTED UNDER
MCOC ACT 1999 AND NIA ACT 2008**

FOR GREATER BOMBAY AT MUMBAI

1. **Name of the Branch** : National Investigation Agency, Mumbai
- FIR No.** : RC-01/2014/NIA-MUM
dated 28-11-2014
- Year** : 2014
- Date & Time** : Between January, 2014 to 28.11.2014
2. **Final Report/Charge Sheet No.** :
3. **Date** : 20/05/2015
4. **Sections of Law** : Section 16, 18 & 20 of Unlawful
Activities (Prevention) Act, 1967 as
amended in 2008 and 2013 read with
section 125 of Indian Penal Code.

5. **Type of Final Report** : Charge-sheet
6. **If Final Report un-occurred-False/** : Not Applicable
Mistake of fact/ Mistake of law/
Non Cognizable / Civil Nature
7. **If charge sheeted: Original/** : Original
Supplementary
8. **Name of Investigating Officer** :
9. **Name of the Complainant/Informant** :
10. **Details of properties/ Articles/** : As per the list enclosed in Annexures
Documents recovered/ seized during "A", "B" and "C".
Investigation and relied upon

11. (1) Particulars of accused person against whom present charge sheet is being filed

Name of accused	: Areeb Ejaz Majeed (A-1),
Whether verified	Yes
Father's Name	
Year/Date of Birth	22 years /
Sex	Male
Nationality	Indian
Religion	
Occupation	
Address (Present)	(i) Kalyan (West) and (ii) Kalyan (West)
Address (Permanent)	...As above...
Date of Arrest	29/11/2014
Date of release on bail	N.A
Under Acts and Sections (of Charge-sheet)	Section 16, 18 & 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with section 125 of Indian Penal Code.
Names of sureties and address	N.A
Status of accused	In Judicial Custody.

12. (1) Particulars of accused person against whom present charge-sheet is not being filed (Wanted Accused)

Name of accused	: Saheem	(A-2)
Whether verified	Yes	
Father's Name		
Year/Date of Birth	26 years /	
Sex	Male	
Nationality	Indian	
Religion		
Occupation	Self Employed	
Address (Present)		, Kalyan (W)
Address (Permanent)	...As above...	
Date of Arrest	N.A.	
Date of release on bail	N.A.	
Under Acts and Sections (of Charge-sheet)	Section 16, 18 & 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with section 125 of Indian Penal Code.	
Names of sureties and address	N.A.	
Status of accused	Wanted	

(2) Particulars of accused person against whom present charge sheet is not being filed (Wanted Accused)

Name of accused	Fahad (A-3)
Whether verified	Yes
Father's Name	
Year/Date of Birth	26 years /
Sex	Male
Nationality	Indian
Religion	
Occupation	
Address (Present)	, Kalyan (W)
Address (Permanent)	
Date of Arrest	N.A.
Date of release on bail	N.A.
Under Acts and Sections (of Charge-sheet)	Section 16, 18 & 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with section 125 of Indian Penal Code.
Names of sureties and address	N.A.
Status of accused	Wanted

(3) Particulars of accused person against whom present charge sheet is not being filed (Wanted Accused)

Name of accused : **Aman**
(A-4)

Whether verified Yes

Father's Name

Year/Date of Birth 21 years / 09.05.1994

Sex Male

Nationality Indian

Religion

Occupation

Address (Present)

Kalyan (W).

Address (Permanent) ...As above...

Date of Arrest N.A.

Date of release on bail N.A.

Under Acts and Sections (of Charge-sheet) Section 16, 18 & 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with - section 125 of Indian Penal Code.

Names of sureties and address N.A.

Status of accused **Wanted**

13. (i) Particulars of witnesses examined : As per Annexure A (Volume ____)
- (ii) List of Documents : As per Annexure B (Volume ____)
- (iii) List of articles : As per Annexure C

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

15. Result of laboratory analysis : As per Annexure "B" and "C" mentioned above.

16. Brief Facts of the Case :

16.1 In pursuance of the direction of MHA, Govt. of India, New Delhi vide order no. 11011/51/2014/IS.IV dated 28.11.2014, National Investigation Agency (NIA), Mumbai, took up the investigation of the case registered RC 01/2014/NIA/Mumbai at Police Station NIA, Mumbai on 28.11.2014 under sections 16, 18 & 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with section 125 of Indian Penal Code against (1)

Areeb

A-1); (2) Saheem

A-2); (3) Fahad

A-3) and (4) Aman

A-4) and other members of

and

started investigation.

16.2 As per the allegations in the FIR, four persons namely (1) Areeb (A-1);

(2) Saheem

(A-2); (3) Fahad

(A-3) and (4) Aman

(A-4) had left the country on 25/05/

for Iraq

Subsequently they parted

and the

and went to

), a banned International Terrorist Organization. After joining ISIL,

underwent the basic

and were actively

involved in . The input received further indicated that ISIL, in conspiracy , was keen not only on resident Indian citizens joining the outfit but was also trying to recruit non-resident Indians settled abroad for participating in the so called not only in and but also in and other countries. The above mentioned information disclosed commission of offences by the above named four persons and others under Sections 16, 18 and 20 of Unlawful Activities (Prevention) Act, 1967 as amended in 2008 and 2013 read with section 125 of IPC.

17. Facts Disclosed During Investigation:

17.1 The investigation revealed that accused Areeb (A-1) and his three associates Saheem (A-2), Fahad (A-3) and Aman (A-4) entered into a criminal conspiracy between January 2014 to November 2014 with the common objective and intention to join (ISIL), a banned International Terrorist Organization and participate in terrorist act not only in and but also in amongst other countries.

17.2 The (IS), formerly known as the (ISIL) or the (ISIS), is a in the . In its self-proclaimed status as a , it claims over all across the world and aspires to bring much of the regions of the world under its control. Under its leader, , ISIS has grown significantly, and attracted youths from other countries as well, to participate in against all by means and is engaged in of and of non-believers.

17.3 ISIL is known for its well-funded network and social media propaganda, which includes internet videos of the , as well as the deliberate destruction of cultural heritage sites.

17.4 On 15th August, 2014, United Nation Security Council Resolution 2170 (2014) has unanimously declared (ISIS) also known as (ISIL) or (IS) or (IC) as terrorist organisation and condemned the 'Recruitment of Foreign Terrorist Fighters'; 'Terrorist Financing'. The said resolution is binding upon all member states that they shall take all measures to prevent the movement of terrorists, as well as their supply of arms or financial support.

17.5 Investigation has revealed that in or around January, 2013, accused Areeb (A-1) got motivated towards especially through on his and through readings about which had started flashing on his pages. Further, Areeb (A-1) started reading various , books and related to ISIL and for eliminating by violent means the . He had read different books through various apps downloaded by him.

17.6 It is also revealed that Areeb (A-1) had started searching about pages related to (IS). ISIL had their own media which was actively showing the work done by IS in and like burning of alcohol factories, burning cigarettes factories, punishing smokers according to . ISIL was appealing to come and live under the Areeb (A-1) started watching and of which had great bearing and impact on his and made him a

17.7 Investigation has further revealed that in pursuance to the above , Areeb (A-1) started searching in the about and of reaching and

joining ISIL. To realize the said objective, Areeb (A-1) started making contacts over or through with of ISIL, its propagators, in order to find the means of the ISIL. In this connection, the arrested accused, Areeb (A-1) tried to contact people from different countries like

who all guided him to reach and contact them thereafter. Prominent amongst them were from and from

17.8 Investigation has revealed that Areeb (A-1) had used his for as well as for or having or with his three associates, Saheem (A-2), Fahad (A-3) and Aman (A-4) and the of ISIL. Areeb Majeed (A-1) was using number & . He used this phone for , for and etc from , Maharashtra.

17.9 Investigation has further revealed that Areeb (A-1) got introduced to Fahad (A-3) somewhere in and became friends in person . Fahad (A-3) had revealed to him that the person who has liked the ISIS pages by was none other than him. Fahad (A-3) had further told Areeb (A-1) that his two friends, Saheem (A-2) and Aman (A-4) were also eager to . Thereafter, Areeb (A-1), Fahad (A-3), Saheem (A-2) and Aman (A-4) conspired to for carrying out the .

17.10 In pursuance to the above conspiracy, Areeb (A-1), Saheem (A-2) and Fahad (A-3) started and discussed various issues like money to be contributed by each of them, etc. Areeb (A-1) was assigned the task of finding the route to for which he had approached

and enquired about holiday package for persons and the formalities to be followed for . The route for was dropped as the was very cumbersome. Instead, Areeb (A-1) came out with a which did not involve any formalities, neither required detailed

17.11 Investigation revealed that in furtherance to the above conspiracy Areeb (A-1) along with Saheem (A-2) and Fahad (A-3) visited , Mumbai on various occasions and chose which would depart on 25/05/2014 by paying a total sum of Rs.2,39,500/- on three occasions. On 22/05/2014, Areeb (A-1), Saheem (A-2) and Fahad (A-3) visited the office of and , while the in the form of remained with the Mumbai had got the of the accused, Areeb (A-1), Saheem (A-2), Fahad (A-3) and Aman (A-4) booked through of Mumbai.

17.12 Investigation revealed that in furtherance to the above conspiracy, Areeb (A-1) booked and hired Mumbai on and all four accused were Mumbai in the late night of , 2014. All accused boarded the Flight No. in the early morning of , 2014 and reached around 07.00 am IST and thereafter made onward journey to on the same day i.e. 25.05.2014. Investigation has also revealed that the four accused had not returned to Mumbai with the on the scheduled date

17.13 Investigation revealed that before leaving for Iraq, accused namely Areeb (A-1), Saheem (A-2), Fahad (A-3) and Aman (A-4) had their family members. As such were filed by the

members of Areeb (A-1) on , Saheem (A-2) on , Fahad (A-3) on and Aman (A-4) on with the jurisdictional , Kalyan (W) Thane. However, before leaving for members wherein he had indicated that he was leaving the family

17.14 Investigation further revealed that after reaching , the took the group to the , which was in the main city of . From to , the group had performed to various places, however, the four accused viz. Areeb (A-1), Fahad (A-3), Saheem (A-2) and Aman (A-4) had during this entire with the . They also avoided staying with the in the , fearing disclosure of their plans and requested the tour guide to arrange for a room in a hotel. On , Areeb (A-1) and his associates stayed in one at

17.15 Investigation has revealed that accused Areeb (A-1) alongwith his three associates during their stay at between had purchased cards of having numbers and others for from outside the for communicating amongst themselves as well as for communicating with the members of ISIL and their propagators.

17.16 Further, it is revealed that, Areeb (A-1) used to contact , an and , an referred to Areeb (A-1) by , one of the propagators of ISIL. Areeb (A-1) had come in contact with R/o through on

17.17 Investigation has also revealed that in pursuance to the aforesaid conspiracy, on the instruction from _____, accused Areeb (A-1) alongwith his three associates contacted one _____ over _____ seeking assistance from him. _____ had sent _____ by means of _____ through _____ on _____ which was received by Areeb (A-1).

17.18 Investigation further revealed that in pursuance of the conspiracy to join _____, the accused Areeb (A-1) alongwith his three associates, Fahad (A-3), Saheem (A-2) and Aman (A-4) had tried to extend their air tickets upto _____ as they were informed by the propagators of ISIL that their " _____ " (which means recommendation from an existing member of ISIL for joining ISIL) was not ready. Accordingly, Areeb (A-1) and his three associates had given _____ to the _____ on _____ for _____ their tour. The _____ on the instruction of his employer on _____ informed the four accused that the _____ of the _____ visa and _____ was not possible.

17.19 The four accused, Areeb (A-1) Fahad (A-3); Saheem (A-2) and Aman (A-4) having realised that the _____ of the _____ was not possible, slipped away from the _____ on _____ without _____ anyone. A _____ was filed by the _____ with the _____ after following the necessary formalities. It was further revealed that Areeb (A-1) and his associates had left their _____ alongwith personal belongings in the _____ which the _____ brought back with him and handed over to the owner _____ alongwith _____ given to the _____ by the accused, Areeb (A-1).

17.20 Investigation has also revealed that the accused Areeb (A-1) alongwith his three associates Fahad (A-3), Saheem (A-2) and Aman (A-4) after slipping away from the without anybody had proceeded to by a from the . After reaching , they had initially checked in a and visited as per the direction of , propagator of ISIL. They got picked up in a vehicle by one , sympathiser of ISIL and they stayed at residence of .

17.21 It was further revealed that the accused, Areeb (A-1) had contacted and for arranging “ ” (for joining ISIL). As per the of , of ISIL, the four accused were dropped on till the outskirts of in a car from where they were taken to a place in the desert area (known as) which was a camp having around of the ISIL armed with various types of weapons.

17.22 It is revealed that after joining the ISIL camp in , the accused were christened as “ ” for Areeb (A-1); “ ” for Saheem (A-2); “ ” for Fahad (A-3) and “ ” for Aman (A-4). They were operating under the new names in . They stayed at for about days in the month of . During this period, war started at city which lasted for 3-4 days and the was captured by ISIL. After ISIL captured the border, the accused, Areeb (A-1) and his three associates were taken from , the then of and to (centre of ISIL where persons joining from outside have to be registered) in in 2014. Here Areeb (A-1) came in contact with , head of the in , whose contact number was communicated to him by when he was in India.

17.23 It is also revealed that at _____ at _____, the accused, Areeb (A-1) and _____ accused, Saheem (A-2), Fahad (A-3) and Aman (A-3) had undergone _____

_____ . After the _____, Areeb (A-1) alongwith his co-conspirators, Fahad (A-3) and Saheem (A-2) were chosen to be _____ . Subsequently Areeb (A-1) took part in several _____ on behalf of the ISIL against the _____, the _____ which are at _____ with _____ . His Co-conspirators are still suspected to be in _____ on behalf of the ISIL.

17.24 It was also revealed that the accused, Areeb (A-1) was injured on three occasions, twice by bullet injury and once during the _____ for which he had undergone medical treatment on _____ at _____ in _____, 2014 and _____ in _____, 2014.

17.25 Investigation revealed that the accused, Areeb (A-1) after the _____ in _____, 2014 had decided to return to _____ for _____ in India. Prior to leaving for India, Areeb (A-1) had joined " _____ and started working in the _____ and in _____, 2014 Areeb (A-1) had personally met _____ who allowed him to leave.

17.26 Investigation has revealed that Areeb (A-1) had planned his return to _____ via _____ . He approached the _____ on _____, 2014 and got an _____ issued in his name on the _____ . Thereafter, the accused, Areeb (A-1) tried to _____ into _____ by taking _____ on _____ . However, he was _____ by _____ at Mumbai airport.

17.27 Investigation has further revealed that the accused Areeb (A-1) was using various

for communicating with his co-conspirators and propagators of ISIL. Investigation has revealed that the email id was created by the accused, Areeb (A-1) while he was in

17.28 Investigation has also revealed that accused, Areeb (A-1) was using facebook accounts like which were connected to his

17.29 Investigation has also revealed that accused, Areeb (A-1) was using accounts connected to id connected to and (iii) to his account

17.30 Investigation has also revealed that accused, Areeb (A-1) was using accounts connected to id and (ii) connected to id . It was also revealed that the account was created by the accused, Areeb (A-1) while he was in . It was also revealed that the accused, "Areeb (A-1)" and were one and the same person.

17.31 Investigation has revealed that the accused, Areeb (A-1) in pursuance to the aforesaid conspiracy, had used his various such as through his ids for exchanging his against of

to attract the and vulnerable towards by

17.32 Investigation has further revealed that the accused, Areeb (A-1) in pursuance to the aforesaid conspiracy alongwith with wanted accused, Saheem (A-2), Fahad (A-3) and Aman (A-4), had actively as a of ISIL against on different occasions. In pursuant to the above conspiracy, Areeb (A-1) had also participated in missions on different occasions and had suffered in the process.

17.33 The investigation has thus revealed the involvement of accused, Areeb @ (A-1) in the instant case. The accused, Areeb (A-1) as a of proscribed terrorist organization ISIL, entered into a of terrorist act by participating in in and by becoming members of ISIL which is involved in . By doing so, the accused, Areeb (A-1) had in alliance with the . By conspiring with his co-accused and to accomplish his goals, accused Areeb (A-1) alongwith wanted accused, Saheem (A-2), Fahad (A-3) and Aman (A-4) on the . Later they, knowingly away from the without and joined the banned international terrorist organisation, ISIL. Here after joining ISIL, the accused, Areeb (A-1) was given a new as “ ”. In pursuance of the aforesaid conspiracy, the accused, Areeb @ (A-1) met several ISIL members, underwent various trainings including training in arms and explosives and actively took part in including as a member of ISIL against . The accused, Areeb @ (A-1) in pursuance to the aforesaid conspiracy, had used through his ids for waging

to attract the of likeminded
and motivate toward

18. Charge :

That the arrested accused Areeb @ (A-1) alongwith his three co-conspirators, Saheem @ (A-2), Fahad @ Abu (A-3) and Aman @ (A-4) and few others entered into a criminal conspiracy, hatched by them between to commit terrorist acts in the name of , more specifically in and and aided and abetted each other by agreeing to commit terrorist acts to strike terror in the with an intent to and in furtherance of the aforesaid criminal conspiracy underwent various trainings including training in arms and explosives and actively took part in various terrorist acts including fidayeen attacks as a member of ISIL against and thereby committed offences punishable under section 16, section 18 and section 20 of The Unlawful Activities (Prevention) Act, 1967 as amended, read with section 125 of Indian Penal Code.

19. The sanction for prosecution of the aforementioned arrested accused person, Areeb (A-1) under of Criminal Procedure Code, 1973 and of Unlawful Activities (Prevention) Act, 1967 has been obtained from the and enclosed herein.

20. It is, therefore, prayed that in the light of the averments herein, documents and other materials filed with this police report u/s 173 Cr.P.C, this may kindly take cognizance of offences.

21. It is further submitted that the investigation of the case
against the accused person Areeb @
(A-1) as well as the named accused Saheem (A-2), Fahad
(A-3) and Aman (A-4) and others.

22. Therefore, it is requested that NIA may be allowed to continue the investigation of the case as per the provisions of section 173 (8) of Cr.P.C.

23. Despatched on :

24. No. of enclosures :

25. List of enclosures : ANNEXURE - A, B, C.

Deputy Superintendent of Police/ CIO,
NIA, Mumbai.

Submitted through

PP/NIA/ Mumbai

