

Sr. No.	Name and Address of Accused	Details of Offence with sections of law.	Major Evidence in Brief in support of the charge, about Commission of offences
1.	Narendra D. Modi Address as in FIR	<ol style="list-style-type: none"> 1. Conspiracy and abetment to commit multiple offences of murder. (120 B, 114 r/w 302 IPC) 2. Furnishing false information (177 IPC) 3. False statement as evidence (199 IPC) 4. Giving false information about offences committed (203 IPC) 5. Injuring and defiling place of workshop (295 IPC), malicious acts to outrage religious belief (295 A. IPC) 6. Uttering words to wound religious feelings (298 IPC) 7. Obstructing public servant in discharge of duties (186 IPC) 8. Omission to assist public servant (187 IPC) 9. Promoting enmity between different groups on grounds of religion (153 A (IPC)) 10. Criminal intimidation 506 IPC 11. Mischief causing damage to public 	<ol style="list-style-type: none"> 1. Instruction to DGP, the Chief Secretary and other senior officials, to give went to the Hindu anger on the minority muslims, in the wake of Godhra incident. Meeting held on 27-2-2002 evening in Gandhinagar, as testified in Affidavit No. 4 of R. B. Sreekumar IPC ADGP (Police Reform) dated 27/10/2005 (See para 49 of FIR) 2. The CM's decision to bring dead bodies of those killed in Godhra train fire in Ahmedabad and parade them in Ahmedabad city, as testified, by Ashok Narayanan in his cross examination by the Nanavathi Commission. 3. Numerous illegal instructions given verbally to officials as detailed in third affidavit by R. B. Sreekumar to the Nanavathi Commission dated 9-4-2004 (Annexure F) 4. Data in the Citizens Tribunal Report, by panel of Judges, Justice Sawant and Justice V. R. Krishna Iyer - in para 10 of FIR. 5. Positioning Cabinet Minister J. K. Jadeja and

property (Section 3 of the prevention of damage to public property Act 1984)
12. Disobeying law with intent to cause injury to any person (Section 166 – IPC)

Ashok Bhatt in the DGP office and Ahmedabad city control room respectively. DGP Chakravarthi was critical of minister I.K. Jadeja remaining in his chamber, as testified by R. B. Sreekumar in his Fourth Affidavit, para 85.

6. Transfer of officers from field executive posts, in the thick of riots in 2002, despite DGP objection (as per media reports) for facilitating placement of those who are willing to subvert the system for the political and electoral benefits, as narrated in para 67 of FIR.

7. Rewarding of Senior officials with undue benefits, even while their conduct is under the scrutiny of Nanavathi Commission, as narrated in para 68 of the FIR. The latest instance was the 6 months extension as State Vigilance Commissioner given to Ashok Narayanan, the then Addl. Chief Secretary, Home Department who has already completed 2 years in the above post-retirement placement. The orders were issued on 28th July 2006 (copy enclosed).

8. No follow up action on the reports sent by R. B. Sreekumar on 24-4-2002, 15-6-2002, 20-8-2002 and

28-8-2002 about anti-minority stance of the Administration. These the copy of reports are appended in Second Affidavit of Sreekumar to the Nanavathi Commission, dt. 6-10-2004.

9. Indictment by the Hon. Supreme Court about injustice done to minority community and riot victims in the investigation of riot cases in respect of
1) Bilkis Bano case as
2) Best Bakery case, as narrated in para 13 and 14 of FIR

10. Partisan investigations betraying prejudice against riot victims belonging, as indicated by Rahul Sharma, the then Suptd. Of Police Bhavnagar District and now SP CBI Gandhinagar, during his cross examination before the Nanavathi Commission as noted in para 18 of FIR.

11. The CM for Narendra Modi did not visit the riot affected areas in the initial days, though he visited Godhra railway station on 27-2-2002 itself.

12. The press statement by Narendra Modi that the reaction against the Muslim community was the operation of Newtons law of reaction.

13. No direction from Narendra Modi to Hindu Organisations against the Observance of Bandh

on 28/2/2006. The bandh had been declared illegal by Kerala High Court.

14. Delay in the requisition and deployment of army, though anti-minority violence had broken out on 27/2/2002 afternoon itself in cities of Vadodara, Ahmedabad etc.

15. Appointment of Pro-VHP advocates as public Prosecutors in riot cases, though as Home Minister, the CM had all means to verify this credentials integrity of these advocates, as noted in para 4, under the captions 'Presnt Situation' in theFIR.

6. Refusal to transfer officers from grass loot level, as per State Itelligence Bureaus recommendation till the arrival of the K.P.S. Gill, as advisor to the CM. For Gill has ensured the transfer and this led to dramatic and drastic improvement in this situation, as indicated by Sreekumar in his Second affidavit to the Nanavathi Commission Dt. 6-10-2004.

17. No action against the print media making communally inciting reports, through State Intelligence Bureau and some field officers had recommended for action, as noted in First Affidavit of R. B. Sreekumar dt. 6-7-2002 and during his cross examination before

the Nanavati-Shah
Commission on 31/8/2004.
(It is the State Home
Department who is
empowered to give clearance
for initiating action against
the Print media)
18. State Home Department
gave misleading reports
about normalcy in the state
to the Central Election
Commission for ensuring
early Assembly Election.
The assessment of the Home
Department was adjudged as
false by the Election
Commission in its open order
Dt. 16/8/2002. As per the
Register for recording verbal
instructions from higher
formations kept by ADGP,
in his Third Affidavit, it is noted
that he was directed to by Home
Dept officials to give favourable
reports about law and order
for facilitating of holding of
early elections.
19. The State Home Secretary
G. C. Murmus was
presumably detailed for
tutoring, cajoling and even
intimidating officials
deposing before the
Nanavathi Commission,
so that they do not
tell the truth and harm the
interests of the CM and
ruling party, as narrated
in Third Affidavit of
R. B. Sreekumar
20. Shri GC Murmu's exercise was
for ensuring that officials will not file
affidavits relating to the
second terms of references to the
Nanavathi Commission,
about the role of the CM

and other Ministers in the riots, as narrated in para 52 of FIR

21. Initiating no action against senior police officers whose work in supervised by the Home Department, for Their grave dereliction of duty in supervision of serious offences investigation as envisaged in Rules 24, 134, 135 and 240 of Gujarat Police Manual vol III, as noted in Fourth Affidavit of R. B. Sreekumar Para no. 94.

22. Despite recommendation by CBI, who investigated the Bilkis Bano case, as per Hon. Supreme Court direction, did not initiate departmental action against Shri Jadeja the then Supdt. Of Police Dahod District for his gross misconduct of negligence.

23. The investigating officers of the Naroda Patia, and the Gulberg Society, cases did not probe into CD regarding telephone calls by BJP leaders and police officers, during riots. Rahul Sharma, SP. CBI presented this CD to the Nanavati Commission and the Commission ordered an inquiry, into this matter, recently, as per media reports.

24. Conducive situation is not created for rehabilitation of riot

victims, though a contrary claim is made by the State Administration in its reports to NHRC. Instead the riot victims were pressurized for compromising with the perpetrators of violence, as a condition precedent for their safe return as rehabilitation.

25. Police inaction facilitating riots as part of conspiracy is detailed in para 13, 14, 61 and 62 of FIR.

26. No minutes of the meetings held by the CM and Senior bureaucrats were issued and instructions mostly were conveyed through phone. Non-issuance of minutes had served to the twin objective of 1) field officers carrying out the conspiracy of pogrom against the minorities and 2) Avoidance of the subsequent monitoring of the actions by jurisdictional officers in the field.

27. No action is taken against officers like K. Chakravarthi then DGP for P.C. Pande, then Commissioner of police, Ahmedabad city, Ashok Narayanan, the Addl. Chief Secretary and a large numbers of Senior functionaries in Govt. who filed incomplete, inaccurate, vague and inadequate affidavits to

the Nanavati Commission
Practically no officer had
provided important documents
relevant to the terms of
reference of the Commission
as Exhibits either in the affidavits
or during the cross
examination, as narrated
in para 54, 55, 56 of the FIR
28. Slack review of post riot
cases as ordered by the Hon.
Supreme Court in 2004. This
was achieved by entrusting this
work to those senior
officers who are willing or
constrained to act according
to political interests of BJP
and the CM, as narrated
in para 84 of FIR.
29. Nepotism practiced in
postings, transfer,
promotions etc,
mounting vacancies in
police departments, as
narrated in para 85 of
FIR for facilitating the
on going subversion of
criminal justice system.
30. The fact that victims of
riots, and more violence,
and police firing were
predominantly for the
Muslim community will
establish that rioters,
the administration, cohorts of
the ruling party (BJP)
were moving in collaboration
for achieving the satanic
objectives of the Chief
Minister statistics in this
respect may be seen in
the Second Affidavit
of Sreekumar to Nanavathi
Commission dt. 6-10-2004,
particularly in para 3 of
appendix V of this affidavit.

The nature of offences detailed in column No. 3 and the quantum of evidence delineated in column No. 4 categorically, establish that the accused no. 1 had violated and has been violating the oath of his allegiance to the provisions of the Constitution of India. Further, through a series of pre-conceived, and planned illegal actions, he carried out and has been pursuing actions, challenging, violating and subverting the letter, spirit and ethos of the Constitution of India. This sinister design has been implemented by means of malevolent use of human and maternal resources, under his command, by virtue of the office of the chief minister presided over by him. The activists, collaborators and supporters of the ruling party – BJP – and its feeder and sister organizations have been motivated, equipped and directed for the accused for perpetration of crimes as listed in column 3.

In other words, the accused, has been waging a war against the real sovereignty of the Indian nation “We, the people”, as etched in the first line of the Preamble of the Constitution of India. The deliberate acts of omission and commission, by the accused, individually and by the medium of his active collaborators in the State Administrations and BJP party bodies went against the foundations of the Basic and Inviolable structure of the Indian polity, as envisioned in the Preamble of the Constitution.

In this perspective the accused had done and has been committing seditious acts, which had, and will be having long term divisive, degenerative and delibitative impact on the monolithic Indian society and on the unity and integrity of Indian nation.

2. Ashok Bhatt
as in FIR

As in the case of
accused No. I

1. By virtue being
cabinet minister in
Modi Govt during the
protracted riots, he is

liable under the concept of collective responsibility of the cabinet, for all offences, as alleged against accused No. 1
 2. He positioned himself perhaps under the instructions of the CM Modi, in Ahmedabad City police control room and made sinister moves for carrying out the conspiracy and other crimes. A moot point for investigation is whether he gave written instructions while he was there. It was a clear instance of his exercising illegal authority on he was not in charge of the Home Dept. This act is an Offence 41 & 186 IPC.

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|----|--------------------------------|---------------------|--|
| 3. | J. K. Jadeja
as in FIR | --do-- | <p>1. As in para 1 above of accused No. 2
 2. He positioned himself in DGP chamber during the early days of communal riots and did sinister moves for carrying out the conspiracy and other crimes. It was a clear instance of his exercising illegal authority he was not in charge of Home Dept. This act is an offence 41 & 186 IPC. This is mentioned in the Fourth Affidavit of RB Sreekumar.</p> |
| 4. | Prabhat Singh
as in FIR | Chamber
---do--- | <p>1. As in para 1 of Ashok Bhatt in in column 4.</p> |
| 5. | Gordhan Zadapphia
as in FIR | ---do--- | <p>1. ---do---
 2. Rahul Sharma, Suptd, of Police CBI deposed before the Nanavathi Commission that as the then Minister of State for Home he had shown communal bias by questioning</p> |

Rahul Sharma about the reasons behind more Hindus being killed in police firing against rioters.(Bhavnagar incident)

6.	Ranjit Singh N. Chawada as in FIR	---do---	As in para I of accused No. 2
7.	Kaushik Kumar J. Patel - As in FIR	---do---	----do---
8.	C. D. Patel as in FIR	---do---	---do---
9.	Niteenbhai R. Patel as in FIR	---do---	---do---
10.	Amitbhai A. Shah as in FIR	---do---	----do---
11.	Anil T. Patel as in FIR	----do---	---do---
12.	Narayan L Patel as in FIR		---do---
13.	Kalubhai Hirabhai Maliwad as in FIR	---do---	1. He collaborated with the other accused in perpetration of violence, pursuance of the conspiracy.
14.	Dilipbhai Manubhai Patel	---do---	---do---
15.	Madhubhai B. Srivastava	---do---	---do---
16.	Dr. Maya Kotdani	----do---	---do---
17.	Nitin Kantibhai Patel	---do---	---do---
18.	Rajendra Singh	---do---	---do---

	Patel		
19.	Dr. K. J. Mehta	---do---	---do---
20.	Dr. Praveen Togadia	---do---	---do---
21.	Dr. Jaideep Patel	---do---	---do---
22.	Babu Bajrangi Patel	---do---	---do---
23.	Prof. K.K. Shastri		---do--- Media reported about his justifying the violence against Muslims during the first week of riots viz file 27-2002 to 5/3/2002
24.	Balubhai Rajput	----do---	As in para I above
25.	K. Chakravarthi	---do---	1. As in para 1 above 2. Deposition by Sreekumar in his Fourth Affidavit to Nanavati Commission about Chakravarthi participant in the meeting chaired by accused No. 1 on 27-2-2002. 3. He did not initiate any follow up action for arresting the subversive of the criminal justice system (CJS), through 4 reports, 1) dt. 24/4/2002, 2) 15/6/2002 3) 20/8/2002 and 4) 28/8/2002 about the undesirable trends were reported to him by R. B. Sreekumar AGDP (copies of these reports are appended in AGDP Sreekumar Second Affidavit dt. 6/10/2004) 4. He played a collaborative role with the accused no. 1, in his conspiracy of the perpetration of violence against the minority muslim

community and subsequent subversion of Govt. machinery.

5. As in para 17 of column 4 of accused no. 1

6. The gross dereliction of his supervisory responsibility and professional commitment by not enforcing the regulations in Gujarat Police Manual particularly vol III, Rule 24, 134, 135 and 240.

He also did not effectively monitor as to whether numerous instructions regarding controlling and containing of communal disturbances, and investigations of communal riot related cases were implemented or not. This lapse is quite poignant with regard to the implementation of instructions in 'The Booklet on Communal Riots' dispatched to all field officers by the former DGP.

K. V. Joseph vide his office order No. SB/44105 D/1175 dt. 19/11/1997.

The net result was that the Hon. Supreme Court had transferred the trail of 2 cases outside Gujarat and one of these investigations was also entrusted to the CBI.

Further, in an unprecedented verdict, the Hon. SC had ordered review of nearly 2000 odd. riot related cases.

7. He did not furnish relevant data to the Nanavati Commission, in his first and only affidavit with reference to the first terms of reference of the commission

8. He did not file any affidavit covering the second terms of reference to the commission

9. He did not initiate any action

against vernacular press which made objectionable and sensational reports violating the laid down regulations and code, through specific reports about this crime was submitted to him by field officers, particularly R. B. Sreekumar AGDP (INT), as detailed in his first affidavit to the Nanavathi Commission Dt. 15-7-2002 and deposed by him before the Commission during the cross examination on 31-8-2004. He did not take any action through the Home Department to prevent the posting of pro-BJP advocates (whose details are given in para 4 under the heading 'Present Situation' in FIR) as public prosecutors, though this fact was reported to him by State Intelligence Bureau. On the whole, his serious acts of omission of his statutory responsibility amounts to a flagrant condonation of and collusion with the violations of law.

26. A.K. Bhargava
the then DGP
as in FIR

---do---

1. As in para 1 above
2. As in para 4 relating to accused no. 25.
3. As in para 6 relating to accused no. 25
4. He did not enforce his own directive to officers for filing affidavit to the Nanavathi Commission

relating to the second terms of reference to the commission as noted in para 81 of the FIR
5. He did not file any affidavit to the Nanavathi commission, though he supervised the Godhra train burning case and other cases relating to riots as AGDP Crime.
6. His negligence in supervision of riot related cases, led to the Hon. Supreme Court ordering reievow of investigation of nearly 2000 odd riot related cases

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|-----|--|----------|---|
| 27. | G. Subha Rao
as then Chief Secretary
as in FIR | ---do--- | <ol style="list-style-type: none">1. As in para 3, 4 of 6 column no. 4 relating to accused no. 1.2. As in para 15, 16, 17, 18, and 26 relating to accused no. 1.3. Did not file any affidavit before the Nanavati Commission though his affidavit is quite relevant to the first and second term of reference to the Commission as he was head of State bureaucracy during the protracted communal riots and subsequent days. |
| 28. | Ashok Narayanan
as in FIR | ---do--- | <ol style="list-style-type: none">1. As in para 3, 4, 6, 8, 9, 10, 14, 15, 16, 17, 18, 21, 25, and 26, in columns 4 of accused no. 12. He did not provide adequate data to the Nanavati Commission in his only affidavit3. He did not fill his second affidavit regarding second |

terms of reference to the Commission.

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|-----|--------------------------|------------|---|
| 29. | P. C. Pande
as in FIR | ---do- | <ol style="list-style-type: none">1. As in para 4, 10, 14, 17, 23, and 25 in column 4 of accused no. 12. As in para 6, 7, 8, in column no. 4 of accused no. 253. He delayed the imposition of curfew in Ahmedabad city, the most communally volatile area in Gujarat state which facilitated the Hindu anti-social elements to indulge in violence against Muslims.4. He did not advise the govt, against bringing dead bodies of Godhra train fire victims and parading these bodies, including dead bodies of people not belonging to Ahmedabad city (a few not even identified) in Ahmedabad city. |
| 30. | K. Srinivas
as in FIR | ----do---- | <ol style="list-style-type: none">1. As in para No. 4, 17, 24, 25, in column 4 of the accused no.1.2. Forcible closing down of relief camps wherein the victims of riots (mostly Muslims) were sheltered in first week of August, 2002. All Collectors used the police to drive victims out of refugee camps. This was done with a view to project false image of normalcy before the Central Election Commission so that early Assembly election will be held in the state, (please read para 16 of R. B. |

Sreekumar, AGDP (Int)
 Third affidavit to the
 Nanavathi commission
 Dt. 9-4-2005.
 3. Failure to perform
 duties of the District
 Magistrate as per the Police Act
 and CRPC through their
 personal interventions and
 effective supervision of
 district police and also by
 taking or initiating action to contain
 control riots so as to stabilize the
 situation, especially
 in those areas under his
 jurisdiction where mass
 murder, rape, and other
 heinous crimes had
 taken place, (as noted
 in third affidavit of
 Sreekumar – para 16)
 4. Did not file affidavits
 before the Nanavati Commission

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|-----|-------------------------------|------------|--|
| 31. | Dr. P. K. Mishra
as in FIR | ---do--- | <p>1. As in para 3, 4 and 26
in column by of the accused
no. 1
2. Did not file affidavit to
the Nanavati Commission</p> |
| 32. | Kuldeep Sharma | ---do--- | <p>1 As in para 4, 21, 24,
25, in column 4 of
accused no. 1.
2. As in column 2 of
accused no. 31</p> |
| 33. | M. K. Tandon
as in FIR | ----do---- | <p>As in column no. 4, 10, 14,
17, 23, and 25 of
accused no. 1 (one)
as noted in column no.
1 if accused no. 29.
Shri. P.C. Pande
Reference the
Did not file affidavit
Nanavathi Commission
on second terms of
commission.</p> |

34.	K. Nityanandam	---do---	1. As in para 1 and 2 in Column 4 of accused no 28 viz Shri Ashok Narayanan 2. As in column 2 of accused no. 31.
35.	Rakesh Asthana	---do---	As in para 4, 21, 24, and 28, of column 4 of the accused no. 1 1. As in para 2 of the accused no. 31
36.	A. K. Sharma as in FIR	---do---	As in case accused no.32
37.	G. C. Murmu	---do---	1. Tutoring of witnesses (Govt officials) deposing before the Nanavathi Commission 2. Threat and Intimidation were hurled at R.B. Sreekumar AGDP for ensuring that he will not tell the truth about communal riots harming the interests of the government, as noted in third affidavit of Sreekumar to the Nanavathi Commission dt. 9-4-2005.
38.	Shivanand Jha as in FIR	---do---	As in the column 4 of accused no. 33
39.	D. H. Brahmhatt FIR	---do---	As in the column no. 4 of accused no. 30.
40.	Deepak Swaroop FIR	---do---	As in column no. 4 of accused no. 32
41.	Sudhir Sinha as in FIR	---do---	He played an unholy role for facilitating a few major witnesses of Best Bakery case turning hostile. He attended even the Hon. Supreme Court proceedings in this matter.
42.	K. Kumarswamy	---do---	----do----

	as in FIR		
43.	B. S. Jabaliya as in FIR	----do---	1. He did not supervise the investigators of riot cases against then pro BJP accused 2. As in para 24 in column 4 of the accused no. 1
44.	D. G. Vanzara as in FIR	---do---	He is responsible for many encounter killings.
45.	Rahul Sharma as in FIR	---do---	As in his column no. 4 of the accused no. 36
46.	Raju Bhargava as in FIR	---do---	As in the column 4 of accused no. 40
47.	Anju Sharma as in FIR	----do----	As in the column 4 of accused no. 30
48.	D. D. Tuleja as in FIR	---do---	As in column 4 of accused no. 40
49.	Bhavesh Jha as in FIR	----do---	As in column 4 of accused no. 30
50.	Niraj Solanki FIR	---do---	As in the column no. 4 of the accused no. 40
51.	Amrutlal FIR	---do---	As in the column 4 of accused no. 30
52.		---do---	As in the column 4 of accused no. 40
53.	P. N. Patel	---do---	As in the column 4 of accused no. 30.
54.	V. M. Pargi FIR	---do---	As in FIR – page 95
55.	K. G. Erda FIR	---do---	As in FIR page 95/96
56.	K. K. Mysorwala FIR	---do---	As in page 96 of FIR

57.	M. T. Rana FIR FIR	---do---	---do---
58.	Tarun Barot FIR	---do---	---do--- He is involved in many encounter killings in Ahmedabad city
59.	Narendra Amin FIR	---do---	---do---
60.	G. C. Raiger- FIR	---do---	1. He attended many meetings chaired by accused no.1 and other senior officials. But he did not file any affidavit to the Nanavathi Commission
61.	K. R. Kaushik FIR	---do---	---do---
62.	A Pathak FIR	---do---	As in the column 4 of the accused no. 40.
63.	Satish Verma	---do---	Not much evidence NB: There is need for Including the names of Suptd. of Police and Dist Magistrates and Range In Charges charges DIG/IG in whose jurisdiction major carnages had taken place viz Districts of Mehsana, Panchmahals, Sabarkantha, Patan, Gandhinagar, Ahmedabad Rural, Anand, Kheda Vadodara Rural, Godhra & Dahod --- in case their names are not included in FIR / PIC then perhaps in the PIL –as respondents the names of Union Home Secretary, Cabinet, Secretary, Director, IB, Joint Director, Central IB –Gujarat state Rajendra Kumar now member Central Vigilance Commission his then immediate supervisor located in Mumbai- Shri Sudhir Kumar, (who insisted on conspiracy theory about Godhra incident) etc.

Kindly note that for convenience against certain accused under column 4, what is whether as specific paragraph in certain other accused is shown. The relevant para has to be taken out and pasted and perhaps minor alterations need to be made also.