

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KISAAN¹ a farmer
On his own behalf and on Behalf of class members²

“Sikhs For Justice” (SFJ), an advocacy Group³ working
for Sikh Peoples’ Right to Self Determination through
Khalistan Referendum and to whom the class
members have submitted the details of abuse.

Plaintiffs,

v.

NARENDRA MODI,
a national and citizen of India;
Prime Minister of India

Defendant

Civ. No. _____

COMPLAINT

CLASS ACTION

JURY TRIAL DEMANDED

The Plaintiffs, allege the following:

I. PRELIMINARY STATEMENT

1. This action is brought by and on behalf of the farmers of Punjab and Haryana who have suffered violence ordered by the **Defendant Modi** under the infamous state sponsored program “**Break The Heads of Protestors**”⁴ being implemented through Chief Minister of Haryana ML Khattar and Chief Minister of Uttar Pradesh Yogi Adityanath resulting in multiple deaths, injuries, torture, inhumane and cruel treatment to farmers.
2. The defendant through his minions has also been threatening the overseas supporters of protesting farmers with violence. In December 2020, criminal charges were filed in India against the foreign based activists of plaintiff SFJ for organizing protest rallies outside Indian Missions in USA, Canada, UK, Germany and other countries. [See Annex “B”]

¹ The Plaintiff “Kisaan” is an individual farmer from Punjab, India filing with the assumed name of “Kisaan” (Farmer), who has requested to withhold his name at this stage of the proceedings owing to his well-founded fear of retaliation from the state and non-state actors in India acting at the behest of the Defendant Modi who besides heading the government also heads an informal army of ardent blind followers who are willing to lynch anyone who dares to criticize the defendant Modi. **Meena Harris**, niece of Vice President Harris, **Gretta Thunberg**, an environmental activist and American singer **Rihanna** were threatened with beheadings and rape for supporting the farmers’ (the plaintiffs) protest against the farm laws passed by the defendant Modi’s Government.

² List of the class members who have submitted the abuse suffered during the relevant period by the actions of the defendant is attached, omitting the first names for security. Complete list can be presented to the Honorable Court, if and when asked. for in camera review. [See Annex “A”]

³ “Sikhs for Justice” (SFJ) (www.SikhsForJustice.org) is a New York based Pro Khalistan advocacy group working on the mission of realizing Sikh peoples’ right to self determination and independence of Indian Punjab through the means of Referendum. The voting in SFJ’s Khalistan Referendum is scheduled to start on October 31st from London, UK. The plaintiff class members of this lawsuit – the farmers who have suffered deaths, injuries and harms as a result of defendant Modi’s actions have submitted the details to SFJ via www.report2un.org. (See list attached). The unredacted version can be presented to the Honorable court for in camera review.

⁴ India Today, August 28, 2021 'Break heads of protestors', Karnal SDM tells cops deployed to tackle protesting farmers. <https://www.indiatoday.in/india/story/haryana-karnal-sdm-tells-cops-deployed-to-tackle-protesting-farmers-viral-video-1846580-2021-08-28>

3. On August 28, 2021, complying with Modi Government's policy of "Break Heads of Protesting Farmers", the police in Haryana brutally beat and injured a protesting farmer Sushil Kumar who succumbed to injuries and died.
<https://scroll.in/latest/1004088/haryana-farmer-injured-in-police-baton-charge-has-died-of-heart-attack-says-bku-leader>



Police in Haryana beating a protesting farmer

<https://www.indiatoday.in/india/story/haryana-karnal-sdm-cops-lathi-charge-protesting-farmers-viral-video-1846580-2021-08-28>

4. In or around September 2020, Modi Government passed the so called "Agricultural Reform Bills" which seriously and adversely affect the landowner ship rights of the farmers as well as their ability to grow the crops and make a living.
5. Since the passing the of Agricultural Reform Bills, farmers from the Sikh-dominated state of Punjab and other areas have been peacefully protesting including the months long "Sit In" at the borders of Indian Capital Delhi since late November 2020, demanding Modi Government to repeal the New Farm Laws which will leave the farmers at the mercy of the big corporations.

6. The ongoing Punjab farmers' protest against the Narendra Modi government's new agricultural laws isn't just a battle to secure a legal guarantee for minimum support price, or seek repeal of the three legislations. The battle is essentially the culmination of the growing realization that Punjab has to free itself of shackles of Indian occupation because under Indian control, Punjab and its farmers will continue to be subjected to economic conditions that will further accelerate suicide and death upon them.
7. Ever since, the farmers protest began in September 2020, the Indian Government, on the orders and directions of the defendant Modi, has employed brutal force including, illegal detentions, beating, torture, sexual violence, harassment against the protesting farmers and their supporters resulting in deaths of several protesting farmers and their relatives and bodily injuries to hundreds of others.
8. American Lawyer-cum-activist Meena Harris, niece of Vice President Harris, famous singer Shakira and environmental activist Greta Thunberg were threatened with murder and rape by the supporters of defendant for tweeting in support of farmers' right to protest.
9. Till to-date several farmers have died and scores have been injured as a result of the actions, policies and orders passed by the defendant Modi without any recourse to justice or law.
10. There is ample evidence that defendant Modi ordered and oversaw, currently ongoing violent onslaught on the lives of protesting farmers in India.
11. As recently as early September 2021, two protesting farmers were killed by the Indian authorities.
12. The defendant Modi remains and will continue to remain beyond and above the law in India and can only be held accountable by a court of law in democratic country like United States of America, which allows civil and criminal prosecution of human rights abusers like Modi, under Alien Tort Statute and Torture Victim Protection Act.

13. The Plaintiffs are those who are either personally injured or had immediate family members who were injured or killed as a result of the onslaught that resulted from this unspeakable cruelty ordered and overseen by the defendant Modi on the protesting farmers in India since September 2020.
14. This is a civil action for compensatory and punitive damages against Defendant Modi for violations of state, federal, and international law committed against the protesting farmers and their respective families from Punjab and other parts of India.

II. PARTIES

A. Plaintiffs

Individual Plaintiffs [Class Representative]

15. The Plaintiff “Kisaan” SINGH, filing under assumed name due to fear of retaliation, is a male individual farmer from Punjab, India who has suffered tort as a result of the policies, actions and orders of the defendant Modi. The plaintiff SINGH also represents similarly situated class members who suffered themselves or their family members.
16. Plaintiff “Kisaan” KAUR, filing under assumed name due to fear of retaliation, is a female individual farmer from Punjab, India who has suffered tort as a result of the policies, actions and orders of the defendant Modi. The plaintiff SINGH also represents similarly situated class members who suffered themselves or their family members.

Organizational Plaintiffs [Civil Society/Class Representative]

17. Plaintiff “Sikhs for Justice” (SFJ) is New York based human rights advocacy group.
18. The class members, on their behalf and on behalf of their deceased family members, submitted the details of the abuses suffered by them to the plaintiff SFJ through the SFJ’s online portal www.report2UN.org designed and launched to enable the protesting farmers to report the abuses suffered at the hands of government to the outside world, including UN and to seek appropriate remedies at the international forums.

19. As a part of its crackdown policy, the Defendant through his agents and officials, has been attempting to block the communication of news and information with regard to abuse and maltreatment of protesting farmers to the outside world.
20. Plaintiff SFJ believes in and adheres to UN Charter and works to promote the human rights as enshrined in Universal Declaration of Human Rights (“UDHR”) and the International Covenant on Civil and Political Rights. SFJ is spearheading the peaceful and democratic campaign for holding non-governmental referendum on the question of establishing the region of Punjab currently governed by India as a sovereign country. The Referendum will give the Sikhs living anywhere in the world and indigenous people of all faiths living in Punjab to express their will on the question of future association of Punjab with India.
- The Voting in SFJ’s the non-governmental Punjab Independence Referendum will begin on October 31st from London, UK and will be monitored and tabulated by “Punjab Referendum Commission” www.punjabreferendumcommission.org a panel of non-aligned experts on direct democracy and secession.
21. SFJ has been supporting the Punjab farmers in their peaceful protest as empirical evidence suggests that Modi Government’s recently passed agricultural reform bills are designed to create conditions that will deprive the farmers of ownership to their lands. Since farming is the main profession for the people of Punjab, these bills pose existential economic threat to the Punjab farmers who are already living under such a distress that over 8800 farmers have committed suicide in year 2020 alone. See: <https://thewire.in/agriculture/punjab-farmers-suicides-debt>
22. On December 10, 2020, the International Human Rights Day, SFJ organized rallies outside Consulates of India in US, Canada, UK, Europe and Australia to show solidarity with the farmers of Punjab.

Defendant’s Response To Plaintiff SFJ’s Support To Farmers Protest.

23. Irked by SFJ’s principled support to the Punjab Farmers’ peaceful struggle, on December 15, 2020, India’s premier investigating agency National Investigating Agency (NIA), filed a charge sheet against Sikh activists living in foreign countries for organizing

protests outside Indian Embassies and for running a campaign for secession of Punjab from India through Referendum. (See Copy Attached). The fact that Indian Government has charged the Sikh activists living in USA, Canada, UK, Germany and other countries for holding rallies outside Indian Consulates is a proof that Indian authorities are not only suppressing the freedom of expression of Sikhs living in India but are also attempting to silence the voices of Sikhs living in western democracies.

24. While it is correct that SFJ seeks the secession of Punjab from India but it seeks to achieve it only through non-violent and democratic modus operandi as demonstrated by its initiative of holding the non-governmental referendum on the issue of Khalistan.
25. Passing of Agricultural Reform Bills, use of force to crush the farmers' peaceful protest and display of complete apathy towards the demands of agitating farmers have caused the SFJ's call for Referendum for the independence of Punjab to resonate even more with farmers of Punjab who, on account of decades of Indian policies of genocide and economic exploitation, rightly feel that the only real, permanent and sustainable solution is the liberation of Punjab from Indian occupation through referendum.
26. With the growing resolve shown by the Punjab Farmers to continue their peaceful protest against farm bills and their support for Khalistan Referendum, Indian authorities have now embarked upon the policy of demonizing the Farmers' agitation by labelling it as "Khalistan terror", ostensibly to create the justification for use of brutal and violence means.
27. For long Indian government has been equating and conflating Khalistan with crime, terrorism and danger and today Indian Government is once again using the bogeyman of Khalistan to delegitimize and demonize the farmers' protest to justify the otherwise unjustifiable removal of peacefully protesting farmers.

B. Defendant:

28. Defendant Narendra Modi is a national and citizen of India and is the Prime Minister of the India since 2014. He presided over, initiated, and condoned the horrors of the acts perpetrated against protesting farmers of Punjab, the fact which forms the factual basis of this complaint. The defendant will be physically present in the United States from around September 23rd till about September 27th and during which time he will also be present within the limits of the Southern District of New York.

29. Defendant is also a member and the leader of Bhartiya Janata Party (BJP) and member of Rashtriya Swayamsevak Sangh (RSS), as well as maintains close association with Vishva Hindu Parishad (VHP) and Bajrang Dal (BD), supremacist groups and organizations in India.
30. Defendant has a track record of inciting, instigating and overseeing violence against anyone dissenting or criticizing.
31. Defendant Modi, besides heading the government of India also heads an informal army of ardent blind followers who are willing and capable to lynch anyone who dares to criticize the defendant Modi. Meena Harris, niece of Vice President Harris an American lawyer and activist and Greta Thunberg, a world known environmental activist were threatened with beheadings and rape for supporting the farmers (the plaintiffs') protest against the farm laws passed by the defendant Modi's government.
32. The plaintiffs are members of Sikh community, while the Defendant has a track record of inciting, instigating and overseeing violence against non Hindus. In 2005, the United States officially recognized and acknowledged the defendant's complicity in the 2002 massacre of Muslims in Gujarat by revoking the defendant's visa and putting a ban on his entry into the United States under the provision of International Freedom Act of 1998.
33. Defendant Modi shares command and control responsibility for wrongs being committed against protesting farmers and Sikhs of Punjab.
34. Defendant Modi is liable in personal capacity as well as shares command and control responsibility for ordering torture on plaintiffs and class members.

C. Class Allegations

35. The class consists of all men, women, and children who are the victims of physical and mental torture and next of kin of those who suffered wrongful deaths at the hands of Indian officials who were acting under the orders and policies set by the defendant.
36. Although so far, 88 members of the class have submitted the details of the abuses suffered, however, the exact number of class members is several hundred.
37. There are common questions of law and fact in this action that affect and relate to each member of the class, including:

- a. Whether the plaintiffs, individually and collectively, suffered an abuse which amounts to tortious liability and which was ordered, commanded or overseen by the defendant.
 - b. Whether Defendant authorized, condoned, commanded, or directed the unlawful acts of the authorities and forces under his control;
 - c. Whether Defendant knew or should have known that his directives, policies and actions, the primary purpose of which was to crush the protest against Agricultural Reform Bills and to spread terror among the farmers and their supporters, at home, and abroad.
 - d. Whether Defendant's actions give rise to liability under applicable international and domestic laws.
38. This action is properly maintained as a class action because a) Defendant has acted and failed to act in a way generally applicable to the class, making any declaratory relief awarded appropriate to the class as a whole, and b) questions of law and fact common to the class predominate over questions affecting individual members and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

III. JURISDICTION AND VENUE

39. Defendant is liable for mental and physical torture and wrongful deaths, under actual and apparent authority and under color of law through the ordering and direction of his forces and authorities to use brutal force resulting in deaths and bodily injuries as defined by the customary international law, the Vienna Convention, and the Torture Victim Protections Act ("TVPA"), Pub. L. No. 102-256, 106 Stat. 73 (1992).
40. Defendant are further liable for violations of customary international law and treaty law prohibiting the commission of human rights violations and war crimes. Accordingly, this Court has jurisdiction over this action based on 28 U.S.C. Section 1350 (Alien Tort Statute) and 28 U.S.C. Section 1331. The Court has jurisdiction over the state law claims pursuant to 28 U.S.C. Section 1367.
41. Venue is proper in the Southern District of New York pursuant to 28 U.S.C. Sections 1391(b) (3). This Court has personal jurisdiction over Defendant.

42. The defendant's actions of from September 2020 till today with respect to ongoing farmers protest, fall within 10 year statute of limitation set by the Torture Victim Protection Act (TVPA).

IV. STATEMENT OF FACTS

A. Key Events:

43. In September 2020 Indian Parliament passed three bills named: Farmers' Produce Trade and Commerce (Promotion and Facilitation) Act; Farmers (Empowerment and Protection) Agreement on Price Assurance and Farm Services Act; and the Essential Commodities (Amendment) Act, commonly referred to as "New Farm Bills" or "Agricultural Reform Bills".
44. These Farm Bills are designed to take the control of land, crops, and income from farmers and transfer the same over to the big corporations like Ambani and Adani's of India who happen to be sponsors of Prime Minister Modi and his party – the ruling BJP.
45. Sikhs and Farmers of Punjab who were already living under distressed economic conditions are disproportionately affected by the New Farm Bills.
46. Agriculture and farming is the main occupation and source of livelihood of the people of the region of Punjab under Indian control. Over 70% of Punjabis earn their living through agriculture.
47. Punjab under Indian control is the only Sikh majority area with almost 60% of the population belonging to the Sikh faith.
48. Since 1947, Sikhs in India have been target of the state policies of discrimination, denial of religious identity, violence, genocide and econocide; all of which pose existential threat to the Sikh people living under Indian control.
49. There is Rs. 1 lakh crore (USD 18 billion) debt on Punjab's farmers. If one goes by the total number of farm households, which is around 10.53 lakh (1.05 million) in Punjab as

per the 2015-16 agriculture census of the government, on an average, there is a Rs 10 lakh (USD 18000) debt on every farm household in the state. While the average income of every farm household in Punjab is Rs 6 lakh (UD 11,000)

50. More than 80,000 farmers of Punjab have committed suicide during the last decade due to insurmountable agricultural debts.

B. Background

51. Punjab farmers' protest against Modi government's New Farm Bills is just a symptom of the problem which has its roots deep in the history of how people of Punjab have been treated by the Indian government since 1947.
52. The current milieu of the farmers' protest against the New Farm Bills can only be understood in the backdrop of what Punjab farmers have been going through.
53. While leaving India, British handed the Sikh majority region of Punjab under the control of India, who ever since, has been on acting on the policies of suppressing the political rights and plundering the economic resources of Punjab.
54. In 1950s, in sheer violation of International riparian laws and the constitution, India took away the control of the rivers of Punjab, depriving the region and its people of the water essential for farming and deprived them of the electricity as well as income.
55. In 1966, India reorganized the region of Punjab under its control, taking away several districts, water heads and electricity generating hubs and handed them over to newly created states.
56. The economic and agricultural policies imposed by India over the decades have caused scarcity of water in Punjab resulting in reduction of crop production and mounting of agricultural debts on the farmers. Consequently, during the past decade more than 80,000 farmers of Punjab have committed suicide due to poverty and economic destitution.

57. The cause and core of Punjab farmers' protest has been aptly summarized by Robin Vochelet who while writing for Canada's McGill International Review, stated:

"The ramifications of these bills extend beyond recent protests and public outrage, with many observers noting how they will disproportionately impact ethnic minorities. More specifically, Sikh communities in India have long endured the crushing weight of their government's repressive policies, brutally demonstrated during the 1984 Operation Blue Star, carried out by then Prime Minister Indira Gandhi. This military operation targeted figures of the Khalistan movement — a Sikh separatist campaign — focusing primarily on the elimination of preacher and militant leader Jarnail Singh Bhindranwale. The military crackdown that followed exceeded its intended purpose of dislodging the insurgent leader, degenerating into what could be considered a state-sponsored genocide against Sikhs. While official reports situate the death toll around 492 civilian deaths, independent estimates recorded far higher numbers, reaching up to 7000 civilian Sikhs. To this day, Operation Blue Star remains a memorable example of Sikh persecution under the Central Government.

This Sikh exclusionary ideology is one of many examples of systemic inequalities entrenched within the Central Government. As a political figure, Narendra Modi has played a vital role in ostracizing non-Hindu communities in India. Serving as Chief Minister of Gujarat in 2002, Modi instigated violence towards Muslims by declaring that an attack on a train at Godhra was related to an act of terrorism organized by Pakistani intelligence services. Pogroms ensued, killing hundreds of Muslims as a result. All the while, Modi suppressed evidence tying him to the onset of violence, effectively concealing the role he played in rousing Hindu extremism."

<https://www.mironline.ca/voices-from-the-margin-punjabi-farmers-and-modis-farms-bills/>

C. Defendant's Response to Farmers' Protest

58. The response of the defendant Modi's government to the Punjab Farmers' protest against agricultural reform bills ranges from resorting to use of brutal force and violence to filing of false criminal charges and harassment. According to the facts reported by the plaintiffs directly to the SFJ, Indian authorities acting on the orders of the defendant Modi have committed the following tortuous acts against the plaintiffs, individually and collectively:

- a) Causing death of protesting farmer or relative
- b) Filing of false criminal charges (FIR)
- c) Filing of Sedition Charge for participating in protest
- d) Arrest/Detention
- e) Baton Charge/Tear Gas/Water Cannon During or At the Protest Rally
- f) Torture in Police custody
- g) Police Raid at home or work Interrogation/Questioning
- h) Sexual violence/abuse/harassment

59. The human cost defendant Modi's policies and actions towards farmers' protest has been detailed on the website:

<https://humancostoffarmersprotest.blogspot.com/2020/12/list-of-deaths-in-farmers-protest-at.html>

which list the number of people died and injured directly as a result of actions and policies sanctioned by the defendant Modi.

60. According to "Human Cost of Farmers Protest", as of September 09, 2021, the total number of deaths have reached 594.

D. Defendant's participation

61. Since before September 2020, the Defendant Modi has been heading the government of India as Prime Minister.

62. Defendant Modi, as Prime Minister of India, formulate the policies, issues orders, and oversees the implementation of policies and actions of the government of India and its officials. Defendant Modi has publicly stood by the official treatment of protesting farmers which establishes that violent crackdown on farmers is in furtherance of his policies.

63. Defendant Modi is directly and personally liable for the suffering of the named plaintiffs and the class members.

E. Inadequacy of local remedies

64. The plaintiffs and the class will not receive any remedy from within Indian system.

65. Defendant Modi has remained and continue to remain beyond the reach of law in India.

66. India has a consistent policy, practice and pattern of impunity. India's record on human rights is marred with torture and human rights violations which go unpunished and unprosecuted for decades despite abundance of implicating evidence. November 1984 genocidal violence against of Sikhs throughout India in the aftermath of Indira Gandhi's assassination and 2002 massacre of Muslims in Gujarat committed with the complicity of Defendant Modi are just few of many such glaring examples of impunity. While the civilized nations like USA, Canada, UK and many European countries revoked defendant's Modi's visa due to his complicity in massacre of Muslims, Indian system and so-called democracy rewarded the mass murderer Modi with the premiership of the country, second time in a row.

67. From the above, it becomes clear that there can be no justice in a country where the government covers up the acts and omissions of a man responsible for the deaths and injuries of thousands persecuted solely because of their religious beliefs. There is no remedy in India. Jurisdiction is proper in this forum and this court must allow for this case to proceed accordingly.

V. CLAIMS FOR RELIEF

68. Plaintiffs' causes of action arise under and violate both domestic law and international law as defined in agreements, declarations, conventions, resolutions, and treaties, including but not limited to the following:

- a. Customary international law and treaties of the United States;
- b. Statutes and common law of the United States;
- c. Statutes and common law of Texas;
- d. Any other applicable laws, domestic, foreign or international.

69. The claims herein under the law of nations are based on norms that are definable, obligatory, and universally recognized.

70. The law of nations prohibits the targeting of civilians and the blatant discrimination based on targeting members of a specific religious group.
71. The law of nations prohibits acts or threats of violence against a specific group of people targeted because of their religious beliefs.
72. Based on the foregoing, Defendant is guilty of Crimes against Humanity, Cruel, Inhuman, or Degrading Treatment or Punishment, Extrajudicial Killing, Wrongful Death, Negligence, Battery, and Intentional and Negligent Infliction of emotional Distress.
73. The testimony of Plaintiffs and other witnesses will show that Defendant since September 2020 has taken actions with respect to farmers' protest which directly caused and resulted in deaths, bodily injury, harm, mental distress to the plaintiffs and class members.
74. Plaintiffs "Kisaan" Singh and "Kisaan" Kaur have requested that their identities be withheld at this stage of the proceedings, fearing retaliation and harm to their family members living in Punjab, India at the hands of defendant Modi and his agents.
75. The United States courts have held that in recognizing the right to a public trial of the Defendant, such considerations "must be balanced against other interests that might justify closing the courtroom to the public, including preservation of order, protection of parties or witnesses, or maintenance of the confidentiality of certain information."⁵

General Allegations

76. The acts described in the Complaint were undertaken under color of law.
77. The acts and injuries to Plaintiffs and their deceased and injured relatives described herein, as well as those similarly situated, were part of a pattern and practice of systematic human rights violations designed, ordered, implemented, and directed with the participation of Defendant and carried out by local law enforcement and military authorities and personnel acting at their direction, and/or with their encouragement and acquiescence.

FIRST CLAIM FOR RELIEF (Crimes against Humanity)

78. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.

⁵ See *United States v. Lloyd*, 520 F.2d 1272, 1274 (2d Cir. 1975).

79. The abuses committed against Plaintiffs and their deceased loved ones constitute crimes against humanity. Defendant knew or should have known that the direction given to the local law enforcement and military personnel under their command and direction would have resulted in the death and torture of protesting farmers.
80. As a result, Defendant is responsible for the wrongful death (murder) of the next of kins of plaintiffs or class members and these murders were knowingly committed as part of a widespread or systemic suppression of farmers' protest.
81. Defendant, by virtue of his inhuman acts and omissions, also caused great suffering and/or serious injury to body or to mental or physical health in the context of a widespread or systemic attack against a specific population.
82. Defendant's acts and omissions constitute "tort[s]... committed in violation of the law of nations or a treaty of the United States" under 28 U.S.C. Section 1350 and also violate 28 U.S.C. Section 1331 in that the acts and omissions against Plaintiffs violated customary international law prohibiting war crimes as reflected, expressed, and defined in multilateral treaties and other international instruments, international and domestic judicial decisions, and other authorities.
83. The acts and omissions constituting crimes against humanity caused Plaintiffs to suffer damages, including physical and mental pain and suffering, in amounts to be determined by a jury at trial.
84. Defendant's acts and omissions were deliberate, willful, wanton, malicious, intentional, and/or oppressive, and should be punished by an award of punitive damages in an amount to be determined by a jury at trial.

SECOND CLAIM FOR RELIEF
(Cruel, Inhuman, or Degrading Treatment or Punishment)

85. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
86. The abuses committed against Plaintiffs and deceased next of kin described herein each constitute cruel, inhuman, or degrading treatment or punishment.
87. These acts include, as alleged in this Complaint also constitute torts committed in violation of the law of nations, and thus of the United States, as reflected in federal common law, which incorporates extrajudicial killing, pursuant to 28 U.S.C. Sections 1331 and 1350.

88. Defendant's conduct constitutes a violation of the law of nations and customary international law prohibiting torture, cruel, inhuman, or degrading treatment or punishment as reflected, expressed, and defined in multilateral treaties and other international instruments, international and domestic judicial decisions and other authorities. Extrajudicial killing is similarly reflected, expressed, defined, and codified in multilateral treaties and other international instruments, international and domestic judicial decisions and other authorities. Therefore, such acts and omissions are actionable.
89. The acts and omissions constituting cruel, inhuman, or degrading treatment or punishment caused Plaintiffs to suffer damages, including physical and mental pain and suffering, in amounts to be determined by a jury at trial.
90. Defendant's acts and omissions were deliberate, willful, wanton, malicious, intentional, and/or oppressive, and should be punished by an award of punitive damages in an amount to be determined by a jury at trial.

THIRD CLAIM FOR RELIEF (Extrajudicial Killing)

91. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
92. With regard to the events alleged herein, Defendant's acted under the actual and/or apparent authority and/or color of law of the State of India. The killings were deliberate and not authorized by a previous judgment pronounced by a regularly constituted court affording all the judicial guarantees that are recognized as indispensable by civilized peoples. The killings were not lawfully carried out under the authority of any country or court.
93. The killings constitute extrajudicial killings under the Torture Victim Protection Act, Pub. L. No. 102-256, 106 Stat. 73 (1992) (codified at 28 U.S.C. Section 1350). Additionally, the killings constitute torts committed in violation of the law of nations, and thus of the United States, as reflected in federal common law, which incorporates extrajudicial killing, pursuant to 28 U.S.C. Sections 1331 and 1350.
94. Defendant's conduct constitutes violations of the law of nations and customary international law prohibiting extrajudicial killing, reflected, expressed, and defined in

multilateral treaties and other international instruments, international and domestic judicial decisions, and other authorities.

95. Defendant knew or should have known that his acts and/or omissions would have resulted in the thousands of deaths by the hands of the military and police at their command and direction.
96. Upon information and belief, no adequate remedy exists at law under the laws of India, which is the place where the conduct giving rise to this action and these claims occurred, nor is any adequate remedy available through the courts of India.
97. The acts and omissions constituting extrajudicial killings caused Plaintiffs to suffer damages, including physical and mental pain and suffering, in amounts to be determined by a jury at trial.
98. Defendant's acts and omissions were deliberate, willful, wanton, malicious, intentional, and/or oppressive, and should be punished by an award of punitive damages in an amount to be determined by a jury at trial.

FOURTH CLAIM FOR RELIEF (Wrongful Death)

99. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
100. Defendant owed a duty to refrain from intentionally and wantonly harmful or outrageous conduct. Defendant owed a duty to Plaintiffs' decedents under customary international law, including but not limited to the Geneva Conventions, which imposes duties upon an occupying power and its officials with regard to protected populations.
101. Defendant breached that duty by authorizing the targeting of members of the Muslim religion in western India and authorizing the use of excessive force, violence, and depravity against said population by members of the military and police forces under their command and direction. Defendant knew or should have known that innocent people would be killed or wounded.
102. As a direct and proximate cause of Defendant's actions and omissions constituting breach of that duty, next of kin of named plaintiff and of class members were killed and suffered injury. It was reasonably foreseeable that such deaths and injuries would occur.

103. Plaintiffs are representatives of class and their deceased relatives and loved ones and bring this suit on behalf as their next of kin.
104. The acts and omissions constituting wrongful death caused Plaintiffs to suffer damages, including physical and mental pain and suffering, in amounts to be determined by a jury at trial.
105. Defendant's acts and omissions were deliberate, willful, wanton, malicious, intentional, and/or oppressive, and should be punished by an award of punitive damages in an amount to be determined by a jury at trial.

FIFTH CLAIM FOR RELIEF
(Negligence)

106. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
107. Defendant owed a duty to Plaintiffs and their decedents to prevent the deliberate, willful, wanton, malicious, intentional, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and other parts in India. Further Defendant owed a duty to Plaintiffs and their decedents to refrain from intentional and wantonly harmful outrageous conduct.
108. Defendant breached that duty by authorizing the military and police forces under his command and direction to engage in the deliberate, willful, wanton, malicious, intentional, and/or oppressive torture, killings, and assaults on the farmers of Punjab and elsewhere in India.
109. As a direct and proximate cause of Defendant's acts and omissions constituting breach of that duty, Plaintiffs and their decedents were harmed. It was reasonably foreseeable that such breach would result in this harm.
110. Beyond mere negligence, Defendant's acts were intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults on the farmers of Punjab and elsewhere in India and should be punished by an award of punitive damages in addition to compensatory damages, in respective amounts to be determined by a jury at trial.

SIXTH CLAIM FOR RELIEF
(Public Nuisance)

111. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
112. Plaintiffs', as members of the public, had a right to health, public peace, public comfort, and/or public convenience.
113. Defendant deliberately and unreasonably interfered with the aforementioned rights by authorizing, commanding, and directing the attack of intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults by the police and military forces under their command and direction specifically targeted against the protesting farmers of Punjab, Haryana and other parts of India.
114. The clamp down arranged and directed as well as encouraged, condoned, and acquiesced in by Defendant caused substantial personal and property damage and endangered the comfort, repose, health and/or safety of Plaintiffs, their decedents, and thereby constitute a public nuisance.
115. The public nuisance created by Defendant directly caused special injuries and damages to Plaintiffs and their decedents, unique from those suffered by the general public. Said public nuisance interfered with, obstructed, and or injured the individual rights of Plaintiffs and their decedents.
116. Defendant's acts and omissions were intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and other parts of India.
117. Defendant's acts were intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and other parts of India, constituting a public nuisance, and should be punished by an award of punitive damages in addition to compensatory damages, in respective amounts to be determined by a jury at trial.

SEVENTH CLAIM FOR RELIEF
(Battery)

118. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
119. Defendant by engaging in the intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and

other parts in India also brought about harmful and/or offensive contact with the persons and bodies of Plaintiffs and their decedents.

120. As a direct and proximate cause of Defendant's conduct, Plaintiffs and their decedents were harmed and such harm was the reasonably foreseeable consequence of the contact.
121. Defendant's acts and omissions caused Plaintiffs and their decedents to suffer damages, severe physical and mental pain and suffering, in amounts to be determined by a jury at trial.
122. Defendant's acts were intentional, deliberate, willful, wanton, malicious, and/or oppressive torture, killings, and assaults on protesting farmers of Punjab, Haryana and other parts in India constituting battery, and should be punished by an award of punitive damages in addition to compensatory damages, in respective amounts to be determined by a jury at trial.

NINTH CLAIM FOR RELIEF
(Negligent Infliction of Emotional Distress)

123. Plaintiffs re-allege and incorporate by reference all the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.
124. Defendant owed a duty to Plaintiffs and their decedents to prevent the deliberate, willful, wanton, malicious, intentional, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and other parts in India. Further Defendant owed a duty to Plaintiffs and their decedents to refrain from intentional and wantonly harmful outrageous conduct.
125. Defendant breached that duty by authorizing, commanding, and directing the military and police forces under his command and direction to engage in the deliberate, willful, wanton, malicious, intentional, and/or oppressive torture, killings, and assaults on the protesting farmers of Punjab, Haryana and other parts in India. Defendant violated this duty and created an unreasonable and foreseeable risk of substantial bodily harm or death to the Plaintiffs and their decedents. The attacks placed the Plaintiffs and their decedents in grave danger and/or made them reasonably fear for their physical safety. During the attacks that Defendant planned, authorized, and directed, as well as condoned and acquiesced in, the surviving Plaintiffs all feared for their lives and experienced great trauma and shock.

126. Plaintiffs have suffered and will continue to suffer extreme mental anguish and emotional distress that was directly caused by the trauma, shock, and fear that they experienced during and directly after the attacks orchestrated by Defendant.
127. Moreover, Defendant's conduct caused many of the Plaintiffs to witness members of their immediate families suffer violent deaths or grave physical injury during the attacks. Defendant's conduct was a substantial factor in bringing about the injuries and deaths to which Plaintiffs bore witness.
128. Many Plaintiffs suffered and continue to suffer emotional torment caused by directly witnessing the violent death or serious physical injury of relatives during the attacks authorized, commanded, and directed as well as condoned and acquiesced in by Defendant.
129. When Defendant's authorized, commanded, and directed as well as condoned and acquiesced in the attacks, he carelessly and negligently ignored the obvious risk of causing the Plaintiff's this trauma, shock, fear, and several emotional mental suffering. Defendant's disregard for the substantial risk of causing this trauma, suffering, and fear, was so extreme and degree as to go beyond all possible bounds of decency, and are utterly intolerable in a civilized society.
130. Defendant's acts were negligent infliction of emotional distress in the torture, killings, and assaults on protesting farmers of Punjab, Haryana and other parts in India, and should be punished by an award of punitive damages in addition to compensatory damages, in respective amounts to be determined by a jury at trial.

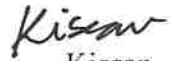
PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pay for judgment against Defendant as follows:

- a. For compensatory damages in an amount to be proven at trial;
- b. For punitive and exemplary damages in an amount of USD 1 Million⁶ per death and USD 100,000 per injured.
- c. For reasonable attorneys' fees and costs of suit;
- d. For such, other, further, or different relief as this honorable Court may deem to be just, proper, fitting, and equitable.

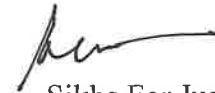
A jury trial is demanded on all issues.

Submitted on: September 17, 2021.



Kissan
Plaintiff

c/o Sikhs For Justice
7520 Astoria Blvd, Suite 170
East Elmhurst, NY 11370
support@sikhsforjustice.org



Sikhs For Justice
Through its coordinator A. Singh
7520 Astoria Blvd, Suite 170
East Elmhurst, NY 11370
support@sikhsforjustice.org

⁶ As of the filing of this lawsuit, 574 farmers have died as a result of Defendant Modi's policy of "**Break the Head of Protestors**" making the current amount of damages for wrongful death as **\$574 Million** subject to increase with more reported deaths.

ANNEXURE “A”

LIST OF FARMERS WHO SUBMITTED THEIR DETAILS

5	singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
6		India	Sikh	Punjab, India	FIR Arrest/Detention	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
7	singh	India	Sikh	Punjab, India	Arrest/Detention Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
8		India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	November 26, 2020 Kisaan March Other Date between September and Present	Shamhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
9	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
10	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon Sexual violence/abuse/harassment	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

11	Singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shajahanpur- Rewari Border, Haryana/Delhi Ghaziipur Border, Uttar Pradesh/Delhi My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
12	singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Torture in Police custody Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
13	singh	India	Sikh	Punjab, India	FIR Sedition Charge Arrest/Detention Torture in Police custody Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
14	Singh	India	Sikh	Punjab, India	Death Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shajahanpur- Rewari Border, Haryana/Delhi Ghaziipur Border, Uttar Pradesh/Delhi My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
15	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

16	Singh	India	Sikh	Punjab, India	Death Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
17	Singh	India	Sikh	Punjab, India	Death Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
18	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
19	kaur	India	Sikh	Punjab, India	Death Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
20		India	Sikh	Punjab, India	Sedition Charge Arrest/Detention Sexual violence/abuse/harassment	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
21	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
22	Singh	India	Sikh	Punjab, India	Death Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

23	singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
24	kaur	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shahjahanpur- Rewari Border, Haryana/Delhi Ghaziipur Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
25	singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shamhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shahjahanpur- Rewari Border, Haryana/Delhi Ghaziipur Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

26	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi Shambhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
27		India	Sikh	Punjab, India	Sexual violence/abuse/harassment	Other Date between September and Present	Singhu Border, Haryana/Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
28	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
29		India	Sikh	Punjab, India	FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
30		India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	Singhu Border, Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
31		India	Sikh	Punjab, India	Arrest/Detention Police Raid at home or work Interrogation/Questioning	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

32	singh	India	Sikh	Punjab, India	Death FIR	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shambhu Border, Punjab/Haryana/Delhi Shahjahanpur-Rewari Border, Haryana/Delhi Ghazipur Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
33		India	Sikh	Punjab, India	FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi My village/town/police station	Police NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
34	singh	India	Sikh	Punjab, India	FIR	Other Date between September and Present	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
35	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
36	Kaur	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
37		India	Sikh	Punjab, India	Arrest/Detention Police Raid at home or work Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	November 26, 2020 Kisaan March	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

38	Alam	India	Muslim	Punjab, India	Arrest/ Detention Torture in Police custody	November 26, 2020 Kisaan March	Shalijahanpur-Rewari Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
39	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
40	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
41	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
42	singh	India	Sikh	Punjab, India	Torture in Police custody	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
43	singh	India	Sikh	Punjab, India	FIR	January 26, 2021 Tractor Rally	Tikri Border, Uttar Pradesh/Delhi	Police IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
44	singh	India	Sikh	Punjab, India	Death	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
45	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

46	singh	India	Sikh	Punjab, India	Death	January 26, 2021 Tractor Rally	Tikri Border, Uttar Pradesh/Delhi	NIA (National Investigation Agency)	Jodh singh
47	Singh	India	Sikh	Punjab, India	Death	November 26, 2020 Kisaan March	Shambhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
48	Singh	India	Sikh	Punjab, India	FIR	Other Date between September and Present	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
49	singh	India	Sikh	Punjab, India	Death FIR Sedition Charge/Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shambhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shahjahanpur-Rewari Border, Haryana/Delhi Ghaziipur Border, Uttar Pradesh/Delhi My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
50	SINGH	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	Other Date between September and Present	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
51	India	India	Sikh	Punjab, India	Torture in Police custody	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

52	singh	India	Sikh	Punjab, India	Death	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
53	singh	India	Sikh	Punjab, India	Arrest/Detention	November 26, 2020 Kisaan March	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
54	singh	India	Sikh	Punjab, India	Death	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
55	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Delhi& haryana police
56	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
57	singh	India	Sikh	Punjab, India	Death Sedition Charge Arrest/Detention Sexual violence/abuse/harassment	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
58	khan	India	Muslim	Punjab, India	FIR Sedition Charge Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
59	Kaur	India	Sikh	Punjab, India	Police Raid at home or work	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Ghaziपुर Border, Uttar Pradesh/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

60	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
61	Singh	India	Sikh	Punjab, India	Death	November 26, 2020 Kisaan March	Tikri Border, Uttar Pradesh/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
62	singh	India	Sikh	Punjab, India	Death	Other Date between September and Present	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
63	kaur	India	Sikh	Punjab, India	Police Raid at home or work	January 26, 2021 Tractor Rally	Singhu Border, Haryana/Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
64	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Tikri Border, Uttar Pradesh/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
65	Singh	India	Sikh	Punjab, India	Death	Other Date between September and Present	Tikri Border, Uttar Pradesh/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

66	Singh	India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Delhi police and indian govt
67	singh	India	Sikh	Punjab, India	Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	My village/town/police station	IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
68		India	Sikh	Punjab, India	Death FIR Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shambhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shajahanpur- Rewari Border, Haryana/Delhi Chazipur Border, Uttar Pradesh/Delhi My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
69	Singh	India	Sikh	Punjab, India	Death	Other Date between September and Present	My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
70	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally	Shambhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

71	Singh	India	Sikh	Punjab, India	FIR	Other Date between September and Present	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
72	S	India	Sikh	Punjab, India	Torture in Police custody	November 26, 2020 Kisaan March	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shambhu Border, Punjab/Haryana/Delhi Chazipur Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
73	Singh	India	Sikh	Punjab, India	Police Raid at home or work Interrogation/Questioning Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally Other Date between September and Present	Singhu Border, Haryana/Delhi My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
74	singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Singhu Border, Haryana/Delhi My village/town/police station	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
75	Singh	India	Sikh	Punjab, India	Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi Shambhu Border, Punjab/Haryana/Delhi	Police IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
76	kaur	India	Sikh	Punjab, India	Death	Other Date between September and Present	My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

77	singh	India	Sikh	Punjab, India	Sexual violence/abuse/harassment	Other Date between September and Present	My village/town/police station	Police IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
78	singh	India	Sikh	Punjab, India	Death	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
79	singh	India	Sikh	Punjab, India	FIR	January 26, 2021 Tractor Rally	Tikri Border, Uttar Pradesh/Delhi	NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
80	singh	India	Sikh	Punjab, India	Interrogation/Questioning	Other Date between September and Present	Tikri Border, Uttar Pradesh/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
81	singh	India	Sikh	Punjab, India	Sedition Charge	November 26, 2020 Kisaan March	Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
82	singh	India	Sikh	Punjab, India	Police Raid at home or work Interrogation/Questioning Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	Other Date between September and Present	My village/town/police station	Police NIA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
83	singh	India	Sikh	Punjab, India	Sexual violence/abuse/harassment	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi	NIA (National Investigation Agency)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.

85	singh	India	Sikh	Punjab, India	Death Sedition Charge Arrest/Detention Baton Charge/Tear Gas/Water Cannon Torture in Police custody Police Raid at home or work Interrogation/Questioning Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally November 26, 2020 Kisaan March Other Date between September and Present	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi Tikri Border, Uttar Pradesh/Delhi Shambhu Border, Punjab/Haryana/Delhi Rewari-Alwar Border, Haryana/Delhi Shahjahanpur- Rewari Border, Haryana/Delhi Ghaziपुर Border, Uttar Pradesh/Delhi	Police NTA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
86	Singh	India	Sikh	Punjab, India	Arrest/Detention	January 26, 2021 Tractor Rally	Shambhu Border, Punjab/Haryana/Delhi	Police	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
87	singh	India	Sikh	Punjab, India	Torture in Police custody Police Raid at home or work Sexual violence/abuse/harassment Forced To Give Bribe To Police To Save from False Criminal Case/Illegal Detention/Torture	January 26, 2021 Tractor Rally	Red Fort Delhi, New Delhi Singhu Border, Haryana/Delhi	Police NTA (National Investigation Agency) IB (Intelligence Bureau)	Because of the fear of retaliation, I do not want to name the Indian officials involved in the abuse.
88	Singh	India	Sikh	Punjab, India	Baton Charge/Tear Gas/Water Cannon	November 26, 2020 Kisaan March	Shambhu Border, Punjab/Haryana/Delhi	Police	Haryana Police

ANNEXURE “B”

Copy of Charge Sheet Filed By National Investigations Agency of India
Against the activists of Plaintiff “Sikhs For Justice” (SFJ) for
organizing protest rallies outside Indian Missions in USA, Canada,
UK, Germany and other countries.



NATIONAL INVESTIGATION AGENCY
FIRST INFORMATION REPORT
(Under Sec. 154 Cr. P.C)

Book No. 01

Serial No. 218

1. **District:** New Delhi **PS:** NIA Hqrs New Delhi
Year: 2020 **FIR No.** RC-40/2020/NIA/DLI **Date:** 15.12.2020

2.

	Act	Sections
(i)	Act: The Indian Penal Code	120 B , 124 A, 153 A, 153B
(ii)	Act: Unlawful Activities (Prevention) Act	13, 17, 18 , 18 B , 20

3. (a) **Suspected Offence:**

'Sikhs For Justice', an 'Unlawful Association' under the Unlawful Activities(Prevention)Act,1967, and other Khalistani terrorist outfits including but not limited to Babbar Khalsa International, Khalistan Tiger Force and Khalistan Zindabad Force along with their frontal organisations, have entered into a conspiracy to create an atmosphere of fear and lawlessness and to cause disaffection in people and to incite them towards rising in rebellion against the Government of India.

In furtherance of above conspiracy, huge funds are being collected abroad for on-ground campaign and propaganda against Government of India including staging demonstrations outside Indian missions in countries like the USA, UK, Canada, Germany and so forth. These campaigns are being spearheaded by designated terrorists Gurpatwant Singh Pannun, Paramjit Singh Pamma, Hardeep Singh Nijjar and others.

It has also been learnt that large amounts of funds so collected are being sent through Non-Governmental Organisations to pro-Khalistani elements based in India, to undertake terrorist acts and to strike terror in the people of India. SFJ leadership has planned large scale disruptive activities intended to damage government and private property and also disrupt supplies and services essential to the life of the community of India.

SFJ and other pro-Khalistani elements involved in this conspiracy, through their incessant social media campaign and otherwise, are radicalizing and recruiting impressionable youth to agitate and undertake terrorist acts for creation of separate nation of Khalistan after secession from Indian Territory.

- (b) **Day:** Tuesday **Date:** 15.12.2020 **Time:** 18:15 PM
(c) **Information received at PS, New Delhi:-** 15.12.2020
(d) **GD No.** 10730 **Date:** 15.12.2020 **Time:** 2000 hrs.

4. **Type of information:** Written

5. **Place of occurrence:** - India and abroad

- (a) **Direction and Distance from PS:** - NA
(b) **Address:**
(c) **In case, outside the limit of this Police Station then Name of PS:-** NA

6. **Complainant/Informant:**

- (a) **Name** : Sh. Rajeev Kumar
(b) **Father's/Husband's Name** : N/A
(c) **Date/ Year of birth** : N/A
(d) **Nationality** : N/A
(e) **Passport No.** : N/A
(f) **Profession** : Under Secretary to Govt. of India.
(g) **Address** : North Block, New Delhi.

7. **Details of known/suspected/unknown accused with full particulars:**

(i) Gurpatwant Singh Pannun s/o Mohinder Singh Pannun r/o Kothi No. 2033, Sec 15-C, Chandigarh presently r/o 167-05 Powell Blvd, Unit-22 White Stone, New York.

(ii) Paramjit Singh Pamma s/o Amrik Singh r/o Vill Bhaku Majra Chamkaur Sahib, Rupnagar, Punjab presently r/o 41, Bowden Road, Smethwick, B677PA, UK.

(iii) Hardeep Singh Nijjar s/o Piara Singh r/o vill Bhar Singh Pura, Phillaur, Jalndhar presently r/o 8193, 143 A Street, Surrey BC, Canada and 1418, 142 Street, 72 Avenue, Surrey BC, Canada.

(iv) Unknown others.

8. **Reason for delay in reporting by the complainant/ informant**

☒ No delay

9. Particulars of properties stolen : None
10. Total value of property lost : N/A
11. Inquest Report/ UD Case No., if any : N/A
12. **First Information contents:**

Whereas Central Government has received information that 'Sikhs For Justice', an 'Unlawful Association' under the Unlawful Activities(Prevention)Act,1967, and other Khalistani terrorist outfits including but not limited to Babbar Khalsa International, Khalistan Tiger Force and Khalistan Zindabad Force along with their frontal organisations, have entered into a conspiracy to create an atmosphere of fear and lawlessness and to cause disaffection in people and to incite them towards rising in rebellion against the Government of India.

In furtherance of above conspiracy, huge funds are being collected abroad for on-ground campaign and propaganda against Government of India by designated terrorists Gurpatwant Singh Pannun, Paramjit Singh Pamma, Hardeep Singh Nijjar and others such as staging demonstrations outside Indian missions in countries like the USA, UK, Canada, Germany.

And whereas, large amounts of fund so collected are being sent through Non-Governmental Organisations to pro-Khalistani elements based in India, incite impressionable youth to undertake terrorist acts and to strike terror in the people of India.

The Central Government is of the opinion that Scheduled offence under the National Investigation Act, 2008 has been committed.

The Government of India, Ministry of Home Affairs, CTCR Division, North Block, New Delhi, vide order F. No. 11011/71/2020 dated 15.12.2020 issued as per provision of sub-section 5 of section 6 read with section 8 of the National Investigation Agency to register and take up the investigation of the scheduled offence.

13. Action taken:

(a) The case is registered as RC-40/2020/NIA/DLI dated 15.12.2020.

(b) Sh. Shankar Brata Raimedhi, IPS, SP, NIA HQrs, New Delhi has been directed to take up the investigation into the case as the Chief Investigating Officer (CIO).

14. Signature / Thumb Impression
Charge of the complainant/informant

Signature of Officer-in-
PS- NIA, New Delhi

15. Date and time of dispatch to the Court;

____/____/____ at ____ Hrs

Signature of recording officer with date

Enclosures: -

- i) Copy of MHA order F. No. 11011/71/2020 dated 15.12.2020
(CTCR Division) North Block, New Delhi.

Copy to: 13480 - 24

1. The Hon'ble NIA Special Court, PHC, New Delhi.
2. The Joint Secretary (CTCR), MHA, North Block, New Delhi.
3. Sh. Nitish Kumar, IPS, IG, NIA HQrs, New Delhi.
4. Sh. Shankar Brata Raimedhi, IPS, SP, NIA HQrs, New Delhi
5. Crime Section, NIA, Delhi.

No. 11011/71/2020/NIA
Government of India
Ministry of Home Affairs
CTCR Division

North Block, New Delhi
Dated, the 15th December, 2020

ORDER

Whereas, the Central Government has received information that 'Sikhs for Justice', an unlawful association under the Unlawful Activities (Prevention) Act, 1967, and other Khalistani terrorist outfits including but not limited to Babbar Khalsa International, Khalistan Tiger Force and Khalistan Zindabad Force along with their frontal organizations, have entered into a conspiracy to create an atmosphere of fear and lawlessness and to cause disaffection to people and to incite them towards rising in rebellion against the Government of India,

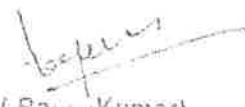
And whereas, in furtherance of the conspiracy, huge funds are being collected abroad for on-ground campaign and propaganda against Government of India, by designated terrorists Gurbachan Singh Pannun, Paramjit Singh Panma, Hardeep Singh Nijjar and others such as staging demonstrations outside Indian Missions in countries like USA, UK, Canada, Germany,

And whereas, large amounts of funds so collected are being sent through NGOs to pro-Khalistani elements based in India, incite impressionable youth to undertake terrorist acts and to strike terror in the people of India.

And whereas, the information involves commission of offences under section 120B, 124A, 153A, 153B of Indian Penal Code and sections 13, 17, 18, 18B and 20 of the Unlawful Activities (Prevention) Act, 1967,

And whereas, the Central Government is of the opinion that Scheduled Offence under National Investigation Agency Act, 2008 has been committed and, having regard to the gravity of the offence, it is required to be investigated by the National Investigation Agency in accordance with the National Investigation Agency Act, 2008;

Now, therefore, in exercise of the powers conferred under sub-section (5) of section 6 read with section 8 of the National Investigation Agency Act, 2008, the Central Government hereby directs the National Investigation Agency to take up investigation of the information received.


(Rajeev Kumar)

Under Secretary to the Government of India

To:-

1. The Director General, National Investigation Agency, CGO Complex, Lodhi Road, New Delhi