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असाधारण
EXTRAORDINARY

भाग II—खण्ड 3—उप-खण्ड (ii)
PART II—Section 3—Sub-section (ii)

प्राधिकार से प्रकाशित
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NAW DELHI, MONDAY, JANUARY 27, 2025/MAGHA 7, 1946

गृह मंत्रालय

अधिसूचना

नई दिल्ली, 21 जनवरी, 2025

का.आ. 457(अ).—केंद्रीय सरकार ने, विधिविरुद्ध क्रियाकलाप (निवारण) अधिनियम, 1967 (1967 का 37) (जिसे इसमें इसके पश्चात् उक्त अधिनियम कहा गया है) की धारा 3 की उपधारा (1) और उपधारा (3) द्वारा प्रदत्त शक्तियों का प्रयोग करते हुए, भारत सरकार के गृह मंत्रालय की भारत के राजपत्र, असाधारण, भाग-2, खंड-3, उप-खंड (ii), में प्रकाशित तारीख 9 जुलाई 2024 की अधिसूचना संख्यांक का.आ. 2660 (अ) तारीख 8 जुलाई, 2024 (जिसे इसमें इसके पश्चात् उक्त अधिसूचना कहा गया है) के अधीन सिक्स फॉर जस्टिस (एसएफजे) को विधिविरुद्ध संगम घोषित करने की अवधि को 10 जुलाई, 2024 से अगले पांच वर्षों के लिए विस्तारित किया था;

और, केंद्रीय सरकार ने उक्त अधिनियम की धारा 5 की उपधारा (1) द्वारा प्रदत्त शक्तियों का प्रयोग करते हुए, भारत सरकार के गृह मंत्रालय की भारत के राजपत्र, असाधारण, भाग-2, खंड-3, उप-खंड (ii) में प्रकाशित तारीख 02 अगस्त, 2024 की अधिसूचना संख्यांक का.आ. 3097 (अ), तारीख 02 अगस्त, 2024 द्वारा विधिविरुद्ध क्रियाकलाप (निवारण) अधिकरण (जिसे इसमें इसके पश्चात् उक्त अधिकरण कहा गया है) का गठन किया था, जिसमें दिल्ली उच्च न्यायालय के न्यायाधीश, न्यायमूर्ति अनूप कुमार मेंदीरत्ता सम्मिलित थे;

और, केंद्रीय सरकार ने उक्त अधिनियम की धारा 4 की उपधारा (1) द्वारा प्रदत्त शक्तियों का प्रयोग करते हुए, इस न्यायनिर्णयन के प्रयोजन के लिए कि क्या सिक्स फॉर जस्टिस (एसएफजे) को विधिविरुद्ध संगम के रूप में की गई घोषणा का

विस्तार करने के लिए पर्याप्त कारण है या नहीं, तारीख 02 अगस्त, 2024, को उक्त अधिकरण को उक्त अधिसूचना संदर्भित की थी;

और, उक्त अधिकरण ने, उक्त अधिनियम की धारा 4 की उपधारा (3) द्वारा प्रदत्त शक्तियों का प्रयोग करते हुए, उक्त अधिसूचना में की गई घोषणा की पुष्टि करते हुए तारीख 3 जनवरी, 2025 को एक आदेश दिया था;

अतः, अब, केंद्रीय सरकार, उक्त अधिनियम की धारा 4 की उपधारा (4) के अनुसरण में उक्त अधिकरण के आदेश को प्रकाशित करती है, अर्थात्:-

---: अधिकरण का आदेश अंग्रेजी भाग में छपा है :---

न्यायमूर्ति अनूप कुमार मेंदीरत्ता, विधि-विरुद्ध क्रियाकलाप (निवारण) अधिकरण

[फा. सं. 17014/27/2024 – IS -VII]

अनिल सुब्रमण्यम, संयुक्त सचिव

MINISTRY OF HOME AFFAIRS
NOTIFICATION

New Delhi, the 21st January, 2025

S.O.457 (E).— Whereas, the Central Government in exercise of the powers conferred by sub-sections (1) and (3) of section 3 of the Unlawful Activities (Prevention) Act, 1967 (37 of 1967) (hereinafter referred to as the said Act), extended the declaration of Sikhs for Justice (SFJ) as an unlawful association for a further period of five years from 10th day of July, 2024 *vide* notification of the Government of India in the Ministry of Home Affairs number S.O. 2660(E), dated the 8th July, 2024, published in the Gazette of India, Extraordinary, Part-II, Section 3, Sub-section (ii) dated the 9th July, 2024 (hereinafter referred to as the said notification);

And, whereas, the Central Government in exercise of the powers conferred by sub-section (1) of section 5 of the said Act constituted the Unlawful Activities (Prevention) Tribunal (hereinafter referred to as the said Tribunal) consisting of Justice Anoop Kumar Mendiratta, Judge, High Court of Delhi *vide* notification of the Government of India in the Ministry of Home Affairs number S.O.3097 (E) dated 2nd August, 2024 published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (ii) dated 2nd August, 2024;

And, whereas, the Central Government in exercise of the powers conferred by sub-section (1) of section 4 of the said Act referred the said notification to the said Tribunal on the 2nd August, 2024 for the purpose of adjudicating whether or not there is sufficient cause for extending the declaration of Sikhs For Justice (SFJ) as an unlawful association;

And, whereas, the said Tribunal in exercise of the powers conferred by sub-section (3) of section 4 of the said Act, made an order on the 3rd January, 2025, confirming the extension of declaration made in the said notification;

Now, therefore, in pursuance of sub-section (4) of section 4 of the said Act, the Central Government hereby publishes the order of the said Tribunal, namely :-

**UNLAWFUL ACTIVITIES (PREVENTION) TRIBUNAL,
NEW DELHI**

Date of Decision: January 03, 2025

In the matter of:

Gazette Notification No.S.O.2660 (E) dated 08th July, 2024, published in the Gazette of India: Extraordinary, Part II, Section 3(ii) on 09th July, 2024 extending the declaration of **Sikhs for Justice (SFJ) as an “unlawful association”** under sub-sections (1) and (3) of Section 3 of the Unlawful Activities (Prevention) Act, 1967 (37 of 1967), for a further period of five years from 10th day of July, 2024.

And in the matter of:

Reference under Section 4 of the Unlawful Activities (Prevention) Act, 1967 made to this Tribunal constituted in exercise of powers under sub-section (1) of Section 5 of the Unlawful Activities (Prevention) Act, 1967 by the Central Government *vide* Gazette Notification No.S.O.3097(E) dated 02nd August, 2024.

CORAM:

HON'BLE MR. JUSTICE ANOOP KUMAR MENDIRATTA

Present: Mr.S.D. Sanjay, learned Additional Solicitor General (ASG) along with Mr.Rajat Nair, Mr.Sabarish Subramanian, Mr.Jay Prakash Singh, Ms.Nikita Sethi, Mr.Shubham Mishra, Mr.Khushal Kolwar and Mr.Dhruv Pande, Advocates for the Union of India.

Ms.Archana Varma, Director; Mr.Subodh Jayaswal, Under Secretary; Mr.Amit Kumar Chandan, Section Officer and Mr.Kapil Rana, Assistant Section Officer, Ministry of Home Affairs.

In attendance :

Mr.Jitendra Pratap Singh, Registrar, Unlawful Activities (Prevention) Tribunal.

ORDER

1. This order answers the Reference made by the Government of India, Ministry of Home Affairs, pursuant to Section 4 of the Unlawful Activities (Prevention) Act, 1967 (hereinafter referred to as the ‘Act’/‘UA(P)A’ for short) for adjudicating whether or not there is sufficient cause for extending the declaration of ‘**Sikhs for Justice**’ (‘**SFJ**’, for short) as an ‘**unlawful association**’.

The Tribunal has been constituted by the Central Government *vide* Gazette Notification No.S.O.3097(E) dated 02nd August, 2024 in exercise of powers conferred by sub-section (1) of Section 5 of the UA(P)A since the Central Government extended the declaration of **Sikhs for Justice (SFJ)** as an “**unlawful association**” for a further period of five years from 10th July, 2024 *vide* Notification

No.S.O.2660(E) dated 08th July, 2024 published in the Gazette of India, Extraordinary, Part-II, Section 3, sub-section (ii) dated 09th July, 2024. The copy of the notification is reproduced for reference:-

**“MINISTRY OF HOME AFFAIRS
NOTIFICATION
New Delhi, the 2nd August, 2024**

S.O.3097(E).-Whereas, the Central Government has extended the declaration of Sikhs for Justice (SFJ) as an unlawful association for a further period of five year from 10th July, 2024 vide notification number S.O.2660(E), dated 08th July, 2024, published in the Gazette of India, Extraordinary, Part-II, Section 3, Sub-section (ii) dated 9th July, 2024.

Now, therefore, in exercise of the powers conferred by sub-section (1) of section 5 of the Unlawful Activities (Prevention) Act, 1967 (37 of 1967), the Central Government hereby constitutes an Unlawful Activities (Prevention) Tribunal consisting of Justice Anoop Kumar Mendiratta, Judge, High Court of Delhi for the purpose of adjudicating whether or not there is sufficient cause for extending the declaration of ‘Sikhs for justice (SFJ)’, as an unlawful association.

[F. No. 17014/21/2024-IS.VII (Part-II)]
ANIL SUBRAMANIAM, Jt. Secy.”

2. The Notification No.S.O.2660(E) dated 08th July, 2024 extending the declaration of Sikhs for Justice (SFJ) as an ‘unlawful association’ for a further period of five years with effect from 10th day of July, 2024 also enumerates the reasons as contemplated under Section 3 of the UA(P)A and is reproduced for reference:-

**“MINISTRY OF HOME AFFAIRS
NOTIFICATION
New Delhi, the 8th July, 2024**

S.O. 2660(E).—Whereas, the Sikhs For Justice (hereinafter referred to as the SFJ), has been indulging in activities, which are prejudicial to the internal security of India and public order, and have the potential of disrupting peace, the unity and integrity of the country;

And, Whereas, the Central Government is of the opinion that the SFJ is indulging in the activities which are prejudicial to the integrity and security of the country;

And, Whereas, the Central Government is of the opinion that following unlawful activities indulged by the SFJ falls within the meaning of clauses (o) and (p) of sub-section (1) of section 2 of the Unlawful Activities (Prevention) Act, 1967, namely: -

- (i) SFJ is involved in anti-national and subversive activities in Punjab and elsewhere, intended to disrupt the sovereignty and territorial integrity of India;
- (ii) SFJ is in close touch with the militant outfits and activists, and is supporting violent form of extremism and militancy in Punjab and elsewhere to carve out a sovereign Khalistan out of territory of Union of India; and
- (iii) SFJ is encouraging and aiding the activities for secession of a part of the Indian territory from the Union of India and supporting separatist groups fighting for this purpose in India and elsewhere by indulging in activities and articulations intended to disrupt the sovereignty and territorial integrity of India;

And, Whereas, the Central Government is further of the opinion that if the unlawful activities of the SFJ are not curbed and controlled immediately, it is likely to –

- (a) *escalate its subversive activities including attempts to carve out Khalistan Nation out of the territory of Union of India by destabilising the Government established by law;*
- (b) *continue advocating the secession of Punjab from the Union of India and formation of Khalistan;*
- (c) *propagate anti-national and separatist sentiments prejudicial to the territorial integrity and security of the country; and*
- (d) *escalate secessionist movements, support militancy and incite violence in the country;*

And, Whereas, the Central Government is also of the opinion that having regard to the activities of the SFJ, it is necessary to declare the SFJ to be an unlawful association.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (3) of section 3 of the Unlawful Activities (Prevention) Act, 1967 (37 of 1967), the Central Government hereby extends the declaration of the Sikhs For Justice (SFJ) as an unlawful association and directs that this notification shall, subject to any order that may be made under section 4 of the said Act, have effect for a further period of five years from 10th day of July, 2024.

*[F. No. 17014/21/2024 – IS-VII]
ANIL SUBRAMANIAM, Jt. Secy.”*

3. Along with the Reference to this Tribunal, the Central Government has enclosed a Background Note, as provided **under Rule 5(ii) of the Unlawful Activities (Prevention) Rules, 1968** as amended upto date which also refers to the cases registered against SFJ and its activities in India.

Gazette Notification No.S.O.3034(E) dated 29th July, 2024 has also been enclosed with Reference, whereby in exercise of powers conferred by Section 42 of UA(P)A the powers exercised by the Central Government under Section 7 & 8 of the said Act shall be exercised by the State Government of Assam, Gujarat, Haryana, Himachal Pradesh, Jharkhand, Punjab, Rajasthan, Uttarakhand, Uttar Pradesh and the Union Territory Administrations of Chandigarh, Jammu and Kashmir and National Capital Territory of Delhi in relation to the Unlawful Association (Sikhs for Justice).

I. HISTORY OF THE PROSCRIBED ORGANIZATION (SFJ)

4. In short, as per the Background Note, Sikhs For Justice (SFJ) is registered under Section 501 (c) (3) of Internal Revenue Code of USA and claims to be a non-profit, human rights advocacy group “striving to create an environment in which minorities can freely exercise their right to self-determination” as enshrined in the ‘Universal Declaration of the Human Rights’ and the ‘United Nations Covenant on Civil and Political Rights’. The outfit also claims to provide the global Sikh community an international platform with a purpose

to lobby and to provide legal advocacy on issues involving human rights violations, racism, religious and cultural intolerance, etc. and to advance political empowerment of Sikhs. The activities of SFJ are usually undertaken from the office of its Legal Advisor Gurpatwant Singh Pannun, both in New York and in California. SFJ's address in New York is Empire State Building, 59th Floor, Fifth Avenue, New York, Tel: +1-212-601-2699, Fax: +1-212-601-2610.

5. It is further reflected in the Background Note that since over the years, SFJ has been involved in intense secessionist and terrorist activities and keeping in view its repercussions for the security and integrity of the country, SFJ was declared as an 'Unlawful Association' under the provisions of sub-sections (1) and (3) of Section 3 of the Unlawful Activities (Prevention) Act, 1967, *vide* a notification published on 10th July, 2019 for a period of five years.

6. Further, despite being declared an unlawful association, SFJ's anti-India activities have continued to increase. In the garb of its professed aims and objectives, SFJ continues to aid and abet unlawful activities and articulations intended to disrupt the sovereignty and territorial integrity of India. Therefore, it has become necessary to extend the declaration of SFJ as an unauthorized association for a further period of five years from 10 July, 2024 in the interest of country's security and integrity.

7. The Background Note further notices the objectives of SFJ and mentions that SFJ is propagating a sovereign State of Punjab (Khalistan) and seeks to liberate Punjab from India and establish an independent Sikh Homeland. The said objective is sought to be achieved through:

(a) *Propagating so called Referendum 2020 in countries having Sikh population and through social media platforms. Various websites launched by SFJ propagate 'right to Self-Determination under International Law' for the people of Punjab claiming that Punjabi is the common language and the Sikhs being predominant in Punjab, they have the right to Self-Determination based on language and religion, causing imputations and assertions prejudicial to national integration.*

(b) *Aiding, abetting and instigating violence to disrupt the sovereignty and territorial integrity of India. It also supports dissolution of India into several smaller states such as Punjab (Khalistan), Kashmir, South India (Dravidstan), Muslim state (Urduistan), separate state for Christians from Manipur.*

(c) *Stake a claim for separate Sikh nation under the UN Charter.*

8. Apart from the objectives of SFJ as noticed above, the Background Note also refers to the activities that the organization has been indulging which are prejudicial to the internal security of India and have the

potential of disrupting the peace, unity and integrity of the country. The same may be reproduced for reference:

3.1 *Sikhs for Justice has been indulging in activities, which are prejudicial to internal security of India and public order, and have the potential of disrupting peace, the unity and integrity of the country. The involvement of SFJ in anti-national activities has increased manifold since July, 2019. However, declaration of SFJ as Unlawful Association in 2019 has helped the security agencies in taking decisive action against the group and in censoring its hostile social media propaganda and making an effective argument against SFJ to the western countries, where the organization is active.*

3.2 *From being a Khalistan advocacy group, SFJ has progressed over the years to an organization indulging in intense secessionist propaganda against India, especially in foreign countries. SFJ has been making concerted attempts to radicalise Sikh youth in India and abroad to lure them into secessionist and terrorist activities. Many known terrorists are supporting SFJ and are using the Referendum platform to radicalise, recruit and initiate Sikh youth into terror activities. SFJ has made repeated attempts to incite various sections of the Indian society for sabotaging sensitive installations and economic infrastructure by offering monetary rewards to youth for undertaking secessionist and terrorist activities.*

3.3 *SFJ has repeatedly threatened India's political leaders, government officers including police, diplomats, judiciary and even their family members and relatives abroad. SFJ organises 'justice rallies', 'genocide conferences', 'seminars', 'fund-raising rallies', 'freedom rallies', protests and filing of baseless court cases against visiting Indian dignitaries abroad (Europe/Canada/USA) to defame them and to fan anti-India sentiments among the Sikh diaspora. The activities of SFJ are usually carried out from the office of its Legal Adviser, Gurpatwant Singh Pannun (GSP), both in New York and in California. GSP had instigated the protesting Indian farmers to arm themselves and fight the Indian forces and stated that the weapons would reach them from across the border. SFJ and GSP are threatening Indian Missions under the 'Kill India' campaign in Canada, USA, UK, Italy, Germany, Portugal and Australia. SFJ has threatened various Indian dignitaries, political figures, diplomats and senior government officers. SFJ has also been inciting to disrupt important events such as the Cricket World cup. Many known terrorists are supporting SFJ and are using the Referendum platform to radicalise, recruit and initiate Sikh youth into terror activities. Holding the Indian Government to be responsible for the recent death or killings of foreign based SFJ activists or sympathisers, SFJ has threatened to avenge the same.*

3.4 *SFJ has also been inciting Sikh personnel in Army and Police forces to desert. SFJ has been colluding with gangsters, terrorists and other radical elements including Kashmiri separatists. Besides, SFJ continues to receive support from Pakistan. Of late, SFJ has also been inciting Muslims, Tamils and Christians from Manipur to secede from India. Currently, around 104 cases have been*

registered against SFJ activists or sympathizers in India by State or UT police and NIA under various sections of UA(P)A, 1967; IPC; Arms Act, 1959; IT Act, 2000 and various other applicable laws.

3.5 The NIA has filed 08 cases against SFJ/GSP for various terrorist and subversive activities aimed to promote divisive agenda targeting the sovereignty and integrity of India. SFJ has threatened vital installations and had attempted to sabotage Railways by removing clips and clamps, thereby endangering lives and causing terror. SFJ had particularly targeted trains ferrying poor migrant labour to take revenge for the recent killings of Pro-Khalistan elements based abroad. SFJ also threatened to disrupt coal supply to thermal power plants.

3.6 The various activities of SFJ are detailed below:-

(i) **Referendum 2020:** SFJ organised a Geneva Convention for its Referendum 2020 wherein it announced the starting of voter registration for Sikh people of all the countries except India with the launch of a web portal. Around 25 websites were launched for registration of voters from Punjab. SFJ announced to carry out door to door voter registration in Punjab and to pay a monthly stipend of Rs. 7500 for execution of this registration. Appeal was issued to Shiromani Gurdwara Parbandhak Committee members, Panchayat members and Sarpanches to support the voter registration process and they were threatened not to leak out any information to the police. While SFJ has failed to gain any traction amongst the Sikh community in India, it has carefully worked around the laws in western countries to amplify its aggressive anti-India campaign. SFJ held the so called 'voting' for its 'Khalistan Referendum' in UK, Italy, Australia, Canada, US, Switzerland and Austria.

(ii) **Incitement to violence:** SFJ continues to incite people for indulging in subversive and terrorist activities. SFJ has been inciting the Indian Sikh jathas travelling to Pakistan for pilgrimage, to access its websites. SFJ has been undertaking recruitment of underprivileged Sikh youths by SFJ for carrying out pro-Khalistan propaganda and conducting terrorist acts or other subversive activities in lieu of money. SFJ activist have been found to be involved in promoting enmity and other subversive activities having a potential to inflame communal tensions and disrupt harmonious co-existence of communities of India. Such elements are found to be receiving instructions and other support from Pak ISI handlers and Gurpatwant Singh Pannun. On 17.01.2023, Pannun announced a monetary reward of \$500,000 for targeting Delhi and raising Khalistani flag in Delhi on 26th January, 2023 to disrupt India's Republic Day celebrations. In a recent video posted by Pannun (02 August), he announced that SFJ will pay 15 lakh dollars to any Sikh soldier who stops PM Modi and burns the Indian flag on August 15.

Dividing people on communal lines by provoking minority communities against the other communities has become a major tool for SFJ to push up its anti-India agenda. SFJ have been

inciting the Christian community in Manipur to raise their voices for a 'separate country', the people of Tamil Nadu to raise flags of 'Dravidstan' and have been stoking Muslim sentiments by raising the bogey of 'minority persecution' and exhorted the Muslims of India to carve out a separate 'Urduistan'. Further, SFJ urged the Dalits of India to extend support for its secessionist exercise, citing their 'persecution' in the hands of Indian Government. SFJ has also been involved in provoking the farmers of Punjab and Haryana over Farm bills.

(iii) **SFJ's Propaganda:** *SFJ's subversive activities undermine the democratic fabric of the country by seeking to challenge the sovereignty of the Indian state. SFJ has employed various tactics to advance its agenda which includes organization of rallies, conducting social media campaigns and lobbying international bodies to support the cause. 'Khabardar Punjab', 'Liberate Punjab from Indian Occupation', 'Tasveer-e-Punjab', 'Awaz-e-quam', 'Ajadi hi Hal', 'Inquilab', 'Jawab Mangda Punjab', etc are some of the programmes initiated by SFJ over various social media platforms in different countries. Youth have been used for activities such as planting Khalistan flags on Government Schools, offices of government authorities such as the District Collector, Sub-Divisional Magistrate, etc.; writing 'Khalistan-2020' and 'voter bano' for Referendum, slogans on sign boards, walls and government offices, removing clips on railway tracks, burning of the Indian flag on railway tracks and scribbling "Khalistan Zindabad" slogans. SFJ has been making highly inflammatory statements and spreading misinformation to provoke the minority communities in order to push up its anti-India agenda.*

(iv) **Links and propaganda in other countries:** *The Pak ISI has been supporting SFJ and its agenda. Following Canada's statement linking the killing of Hardeep Singh Nijjar with Indian agencies, SFJ activists had raised pro-Khalistan and anti-India slogans while holding the flags of Khalistan outside United Nations Headquarters in New York and also carried out protests outside the Indian Missions in USA, UK, Australia, etc. Indian National Flag was also desecrated by the protestors. SFJ has been trying to project itself as the well-wisher of other countries (viz. China and Pakistan) and seeking their support for its Referendum 2020 agenda. SFJ had shared a video message that it will reimburse the service fee of \$20 to the people of Punjab who will be visiting Kartarpur Sahib and had urged the Sikh pilgrims at Kartarpur Sahib to use Google App "2020 Sikh Referendum". SFJ called Kartarpur Sahib Corridor as Bridge to Khalistan.*

SFJ has claimed to have conducted a number of campaigns for sending bulk emails to International organizations and to the governments of foreign nations for getting publicity and to fuel up its anti-India agenda.

SFJ has been holding anti-India protests outside Indian Embassies or Consulates or High Commissions to raise Khalistan flags to counter India's Republic Day celebration in different

countries. During such protests, SFJ and its sympathizers have been dishonoring the Indian national flag and burning of copies of the Constitution of India. They often indulge in violence and vandalizing of the property. At several venues, these protest events have been organized by SFJ with active support of the Pak Missions and in tandem with multiple ISI backed Pakistani Diaspora outfits and Kashmiri diaspora. SFJ gave a call for besieging the Indian Embassies in Canada, USA, UK, Portugal, Italy, Germany and Australia and disrupting independency day celebrations at the Indian Missions, in opposition to killing of Khalistani operatives abroad. SFJ released a video depicting burning of the Indian national flag and ashes of the same were sent to the High Commission of India, Ottawa on August 15, 2020.

SFJ is reported to have attempted political lobbying abroad with a view to coerce Indian Government to repeal the CAA and represented to the USCIRF against CAA and abrogation of Article 370 under the banner of 'Khalistan Kashmir Referendum Front' (KKRF).

Hindu targeted hate crimes, primarily in Canada and Australia have been increasing and there have been a rising numbers of instances, where Hindu temples are being defaced with pro-Khalistan/anti-India graffiti, often aligned with the 'propaganda calls' of SFJ. After the deadly ISIS attack at Gurdwara Kart-e-Parwan, Kabul, Afghanistan, SFJ exhorted the ISIS to target the Indian Embassies instead of Gurdwaras.

Following the killing of Nijjar, SFJ held protest car rallies worldwide on July 08, 2023 titled 'Kill India Rally' outside Indian missions in US, Canada, UK, Germany and Australia and posters featuring photographs of Indian diplomats were circulated by SFJ.

(v) **Links with other separatists, terrorists, gangsters and radical elements:** *Beside its links with Pakistan, SFJ also has links with militants and gangsters abroad. SFJ has claimed the responsibility for committing terrorist acts in India and its activists are involved in terror funding in India. SFJ has been found associating with gangster elements abroad to propel its secessionist campaign. It has been revealed that Gurupatwant Singh Pannun actively conspired with the members of other Pro-Khalistani entities (PKEs) based in various countries like UK based Paramjit Singh alias Pamma, a Babbar Khalsa International (BKI) terrorist, Canada based Hardeep Singh Nijjar, Khalistan Tiger Force (KTF) terrorist and several overseas Punjab based Khalistani separatists/terrorists, with a view to incite pro-Khalistan sentiments and to revive terrorism in the State of Punjab and other parts of India. SFJ had called upon the gangsters of the Punjab, Haryana and Rajasthan to join SFJ's Khalistan Referendum campaign and also offered 'bail money' to the jailed gangsters for joining hands with SFJ.*

After the abrogation of Article 370, SFJ had started a campaign on social media to get the support from Kashmiri separatists for its own Referendum 2020 agenda. SFJ has urged Sikhs and Kashmiris to observe 15th August as 'Black Day'.

(vi) **Threats to important persons:** Gurupatwant Singh Pannun has issued threats of dire consequences to the Prime Minister Shri Narendra Modi, Home Minister Shri Amit Shah and the External Affairs Minister Dr S. Jaishankar. SFJ has also been threatening the Chief Minister and Ministers of Punjab, National Security Advisor, R&AW Chief, senior police and other government officers, diplomats, judges and other legal practitioners; targeting Indian Missions and Indian diplomats in different countries. Pannun has announced a reward of \$2,50,000 for murdering Lieutenant General Kuldeep Singh Brar, Major General Keshav Padha, Brigadier Israr Khan and Colonel Jasbir Rana for attacking Darbar Sahib in June, 1984. He also threatened the senior officials of Government of India and the officers of Law Enforcement Agencies. On 03.06.2023, Pannun, through a video message, admitted that on his instructions, Pro-Khalistani slogans, "84 Indira Thoki, 86 Vaidya Thokea, 2024 KS Brar Thoko, \$1 Million- SFJ Khalistan Zindabad" were inscribed by SFJ activists at the native village of Lieutenant General K S Brar who headed Operation Blue Star. He also announced a reward of \$ 1 Million for sharing information on whereabouts of Lieutenant General K S Brar. Through an official letter, SFJ warned NIA and Punjab Police over the arrest of Cypress based Gurjeet Singh Nijjar.

Pannun is reported to have raised substantial funds for commission of terrorist acts and killings of important leaders, public figures and functionaries to overawe the government and the Indian public at large and intends to use the same for commission of terrorist acts for the ultimate objective of creation of Khalistan. SFJ has also claimed to have prepared a list of children of Police officers and politicians who are studying in foreign countries to take revenge, if its activists are tortured.

On 09.06.2020, Gurupatwant Singh Pannun threatened Captain Amarinder Singh the then Chief Minister of Punjab, Badals and Bhagwant Mann to meet same condition as Indira Gandhi and Beant Singh. On 28.08.2021, he again threatened Captain Amarinder Singh, by stating that he must remember Dilawar Singh Babbar who has carried out the Referendum through bomb in 1995 which killed Beant Singh.

Photographs of Indian diplomats [Ambassador Vikram Duraiswami, Ambassador Tranajot Singh Sandhu, Ambassador Sanjay Kumar Varma, Shri Aseem R. Mahajan, Dr. Shashank Vikram, Ms. Apoorva Srivastava and Shri Manish] have been circulated by Pannun mentioning them as 'Killers in UK'/'Killers in USA'/'Killers in Canada'/'Killers in Australia' blaming them for killing of Hardeep Singh Nijjar and prominently displaying 'Kill India posters', thus making Indian diplomats vulnerable and putting at risk the lives of senior Indian diplomats, officials and their families posted in various countries.

(vii) **Threat to disrupt events and target infrastructure:** SFJ was involved in activities targeting the G-20 Summit 2023 in New Delhi. It issued an open letter to Foreign Ministers of participating countries, seeking their support to 'Khalistan Referendum'. SFJ has been threatening to disrupt the road, rail and air transportation systems and other vital installations and infrastructures. SFJ activists removed clips of railway track and scribed "Khalistan Zindabad", burnt Indian tri-color on railway track. SFJ has given a call to burn the Indian Constitution and Indian National Flag on

26th January and 15th August. On 14th March 2023, SFJ activists/ sympathizers had removed the clips of the Railway track at village Lehra Mahout, district Bhatinda. Around 50 clamps were removed from the Railway Track near Pathrala Railway Station (Punjab) on 17th/18th March, 2023 on the directions of Pannun, thereby endangering the life of passengers travelling by the train, halting the economic activity as well as causing terror in the minds of the people. Pannun and his associates also exhorted Pro-Khalistani Elements (PKEs) to sabotage railway tracks in Punjab to cause derailment/accident of passenger and goods trains, particularly those ferrying migrant labourers to take revenge of recent killings of PKEs based abroad. The railway track located between Ludhiana and Sirhind is learnt to be preferred target for the attack.

Earlier, on 15 Aug, 2022 which marked the 75th Anniversary of Independence, Pannun threaten that SFJ will plunge India into darkness by disputing coal supply to thermal power plants. He also published video footage of Railway Clips being removed by his associates outside Rajiv Gandhi power plant Hissar, Haryana. On 22nd March 2023, he provoked the people of Punjab to counter-attack by targeting Pragati III power plant to shut down Delhi. Later, on 16.05.2023, Pannun called upon Kashmiri separatists to target/block Srinagar Airport in order to warn G-20 delegates arriving to attend G-20 Summit in Kashmir.

French President Macron, who was the Guest of Honour for the Republic Day, 2024, was targeted by SFJ accusing him of assisting the Indian Prime Minister in his 'quest' to suppress freedom of Speech and expression of Khalistanis.

(viii) **Instigation of Army, Police and Government officials for desertion:** SFJ, has been trying to provoke on social media, the Sikh Soldiers of Indian Army for Mutiny by asking them to leave the Indian Army and join SFJ. Gurpatwant Singh Pannun had urged Sikh Soldiers to join the SFJ movement and offered Rs 5000/- more than the salary given by Indian Government. He also tried to provoke the Sikh soldiers posted in Ladakh to not to fight for India against Chinese aggression. Pannun also tried to provoke the Punjab Police officials urging them not to stop farmers going to Jalandhar, Pathankot and Abohar and to stop the Prime Minister for his upcoming rallies. Pannun had called upon the Punjab Police personnel to follow the footsteps of slain militant Dilawar and to support Khalistan Referendum.

(ix) **Court cases filed against Indians:** SFJ is not only spreading anti India propaganda through organizing protests/pro-Khalistan rallies against Indian dignitaries but also filing baseless court cases against visiting Indian dignitaries abroad (Europe, Canada and USA) to defame them and ban anti-India sentiments among the Sikh diaspora.

(x) **Cases registered against SFJ in India:** Several cases have been registered against SFJ in Punjab, Delhi, Chandigarh, Himachal Pradesh, Haryana, Rajasthan and Assam and after it being

declared as unlawful Association. A total number of 104 cases are currently registered in India against SFJ. 96 cases have been registered by State/UT Police and 08 cases by the NIA. Details are at **Annexure- II**

State/UT	Cases Registered	Cases Solved/ cases where arrests made	Number of Arrests
Punjab	55	32	105 (After removing duplicity as in a number of instances one person is accused in multiple cases)
Haryana	13	06	
Chandigarh	01	00	
Delhi	13	06	
Himachal Pradesh	06	05	
Uttarakhand	01	01	
Gujarat	02	01	
Assam	03	00	
Rajasthan	01	01	
Jharkhand	01	00	
Total	96	52	

9. The Central Government has further relied upon FIRs registered under provisions of Unlawful Activities (Prevention) Act, 1967, Indian Penal Code and other laws as reflected in Annexure-II to the Reference Note, to arrive at a subjective satisfaction that declaration of SFJ as an “Unlawful Association” under the provisions of UA(P)A is to be extended for a further period of five (5) years with effect from 10th day of July, 2024. The list of FIRs mentioned in Annexure-II to the Reference Note along with the gist of the cases and updated status is reproduced for reference:-

“Annexure-II

“Details of Cases currently registered against SFJ and its activists in India.

Sl. No.	Case particulars	Incidents involved	Arrests made	Latest status of cases
Punjab (55 cases)				
1.	FIR No. 93 dated 06.08.2016 u/s 10, 11, 13, 17, 19, 38, 39 UA(P)A, 1967 and 25 Arms Act at PS Chabewal, District Hoshiarpur	The case is related to the first ever SFJ module raised in India by Italy based Avtar Singh @ Tari and USA based Harjap Singh Jhapi. 15 ‘Referendum 2020’ T-shirts, Khalistani flags, three firearms and 40 rounds were recovered	(04) (i) Jaspreet Singh (s/o Kulwinder Singh, r/o Village Handowal, PS Chabbewal District Hoshiarpur, Punjab)	Verdict in the case was delivered on 03.04.2019. One accused (Bikramjeet Singh) was acquitted Two accused (Hardeep Singh and

		<p>from possession of the module members. The accused were tasked to target sacrilege offenders in Punjab.</p>	<p>(ii) Hardeep Singh (s/o Mohan Singh, r/o Village Jallowal, PS Chabbewal, District Hoshiarpur, Punjab)</p> <p>(iii) Kuldeep Singh (s/o Harvinder Pal Singh, r/o H. No. 135, Gali No. 6, Mohalla Sheikhan, Hoshiarpur, Punjab)</p> <p>(iv) Bikramjeet Singh (r/o Village Annaikot Kalan, Batala, District Gurdaspur, Punjab)</p>	<p>Kuldeep Singh) were awarded two years of imprisonment. Module leader Jaspreet Singh was awarded three years' imprisonment. Two abroad based handlers (Avtar Singh/ Italy & Harjap Singh/USA) were declared PO in the case on 15.12.2016 & 23.01.2018 respectively.</p>
2.	<p>FIR No. 149 dated 06.07.2017 u/s 123, 124-A, 153-A, 153-B, 120-B of Indian Penal Code (IPC) and Sedition Act at PS Sohana, SAS Nagar</p>	<p>The case was registered after a series of posters/hoardings of 'Khalistan Referendum' was sighted at nearly 40 outdoor sites in different places of Punjab. Two persons were subsequently arrested in this connection and the posters were found having been printed from one Jammu based</p>	<p>(02)</p> <p>(i) Harpunit Singh (s/o Gurdyal Singh, r/o Chak Mussa, PO Deblehar, PS R.S Pura, District Jammu)</p> <p>(ii) Gurpreet Singh (r/o Phase 5,</p>	<p>The case is under trial. Both the accused were granted interim bail on 15.11.2017.</p>

		<p>'SK Publicity Printing Press', run by one Harpunit Singh. Besides, three New York (USA) based SFJ proponents were also booked in the case, viz. Gurpatwatnt Singh Pannun (o/r/o Village Khankot, District Amritsar, Punjab), Jagdeep Singh @ Baba Jagg Singh (o/r/o Fatehgarh Sahib, Punjab) and Jagjeet Singh (o/r/o Jammu).</p>	<p>Industrial Area, Mohali, Punjab)</p>	
3.	<p>FIR No. 26 dated 02.04.2018 u/s 436, 511, 120-B IPC at PS Sadar Banga, district SBS Nagar</p>	<p>The case is related to busting of a module of SFJ, which was responsible of arsoning liquor vends and putting up pro-Khalistan posters/banners as per instructions of their then Malaysia based handler Kulvir Kaur and Pakistan based Fateh Singh. Handler Kulvir Kaur was later arrested on 15.08.2019 on her arrival in India from Malaysia.</p>	<p>(06)</p> <p>(i) Manvir Singh (s/o Bahadur Singh, r/o VPO Khan Khana, District Nawanshahr, Punjab)</p> <p>(ii) Lakha Singh (s/o Sukhdev Singh, r/o Village Salana Bet, PO Hambowal Bet, Machhiwara, District Ludhiana, Punjab)</p> <p>(iii) Jaspreet Singh (s/o Santokh</p>	<p>The case is under trial. All the accused have been granted bail.</p>

			<p><i>Singh, r/o VPO Khan Khana, District Nawanshahr, Punjab)</i></p> <p>(iv) <i>Sukhwinder Singh (s/o Sahib Singh r/o r/o VPO Khan Khana, District Nawanshahr, Punjab)</i></p> <p>(v) <i>Randhir Singh (r/o VPO Khan Khana, District Nawanshahr, Punjab)</i></p> <p>(vi) <i>Kulvir Kaur @ Deep Kaur (d/o Gurbaksh Singh @ Bhola Singh, w/o Sanjeev Kumar, r/o Village Mom, PS Mahil Kalan, District Barnala, Punjab)</i></p>	
4.	FIR No. 46 dated 31.05.2018 u/s 307, 438, 427, 148, 149, 121, 121A, 122, 124A, 115, 120B IPC, 11/12/13/17/18 UA(P)A, 25/54/59 Arms Act & 66-F IT Act	The case involves busting of a module of SFJ, which was found inter-connected with the module at Sl. No. 3. This module members torched a liquor vend at Panjgrain, Batala,	(07) (i) <i>Kirpal Singh Aulakh (s/o Karnail Singh Aulakh, r/o Fatehpur Nawanpind, PS Valtaha, District</i>	The case is under trial. All the accused are currently out on bail.

	<p><i>at PS Ranger Nagal, Batala, District Gurdaspur</i></p>	<p><i>owned by one Balraj Singh, in the intervening night of May 30/31, 2018 on the instructions of then Malaysia based handler Kulvir Kaur and Pakistan based Fateh Singh.</i></p>	<p><i>Tarn Taran, Punjab)</i></p> <p>(ii) <i>Dharmindar Singh @ Commando (s/o Sarabjit Singh, r/o Village Harpura, PS Ghuman, District Gurdaspur, Punjab)</i></p> <p>(iii) <i>Ravinder Singh @ Harvinder Singh @ Raja (s/o Sadhu Singh, r/o Village Daulatpur, PS Wadala Granthian, District Gurdaspur, Punjab)</i></p> <p>(iv) <i>Harnam Singh (s/o Lachhman Singh, r/o village Chakrala, Kartarpur, District Kapurthala, Punjab)</i></p> <p>(v) <i>Nirmal Singh (sibling of aforesaid</i></p>	
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			<p><i>Harnam Singh at Sl. No. (iv), s/o Lachhman Singh, /o village Chakrala, Kartarpur, District Kapurthala, Punjab)</i></p> <p><i>(vi) Varinder Singh</i></p> <p><i>(vii) Kulvir Kaur @ Deep Kaur (d/o Gurbaksh Singh @ Bhola Singh, w/o Sanjeev Kumar, r/o Village Mom, PS Mahil Kalan, District Barnala, Punjab)</i></p> <p><i>(Accused Kulvir Kaur is accused in one more case in the list at Sl. No. 3.)</i></p>	
5.	<i>FIR No. 87 dated 19.08.2018 u/s 505 IPC PS City-1, district Mansa</i>	<i>This case was registered after the accused pasted posters of 'Referendum 2020' outside the office of Mansa based Shiv Sena leader Harminder Pal Bansal near Bhagat Singh Chowk, Mansa City. The accused were</i>	<p><i>(03)</i></p> <p><i>(i) Hardam Singh (s/o Tek Singh, r/o Khokhar Road, Ward No. 26, District Mansa, Punjab)</i></p> <p><i>(ii) Karamjit Singh (s/o Gurdial Singh, r/o Near Guru Nanak</i></p>	<i>Not available</i>

		arrested in the case on 07.12.2018.	Hospital, Ward No. 27, District Mansa, Punjab) (iii) Pardeep Singh (s/o Nirpal Singh, r/o Near Sidhu Hospital, Ward No. 2, District Mansa, Punjab) (Two of these three accused are also booked in another case in the list at Sl. No. 12)	
6.	FIR No. 152 dated 19.10.2018 u/s 124A, 153B, 120B of IPC at PS Sultanwind, Amritsar	This case was registered on the basis of secret information that Sukhraj Singh @ Raju and his associates are receiving funds from abroad for the publicity of 'Khalistan Referendum'. They prepared cloth banners of Khalistan and put them at various places in Amritsar City.	(14) (i) Sukhraj Singh @ Raju (s/o Balwant Singh, r/o Patti Beniwal, Sultanwind, District Amritsar, Punjab) (ii) Malkiat Singh @ Meetu (s/o late Baljit Singh, r/o H. No. 422, Patti Beniwal, Sultanwind, District Amritsar, Punjab) (iii) Bikramjit Singh @ Vicky (s/o Sardool Singh, r/o Village Jallapur Khera, PS Beas	NIA took over the case and re-registered it vide RC No. 19/2020/NIA/DLI dated 05.04.2020.

			<p><i>District Amritsar, Punjab)</i></p> <p>(iv) <i>Harpreet Singh @ Happy (s/o Sakattar Singh, r/o Village Naushera Pannunan, District Tarn Taran, Punjab)</i></p> <p>(v) <i>Gurwinder Singh @ Gurpreet Singh @ Gopi (s/o Jagir Singh, r/o Patti Desuwala, VPO Naushera Pannunan, District Tarn Taran, Punjab)</i></p> <p>(vi) <i>Manjit Singh @ Manga (s/o Dharam Singh, r/o Patti Fallian Di, Khadoor Sahib, District Tarn Taran, Punjab)</i></p> <p>(vii) <i>Jatinder Singh @ Varinder Singh @ Goldy (s/o Balwinder Singh, r/o Patti Fallian Di, Khadoor</i></p>	
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			<p><i>Sahib, District Tarn Taran, Punjab)</i></p> <p>(viii) <i>Harmeet Singh @ Raju (s/o Vijay Singh, r/o H. No. X/1545, Street No. 8, Rajgarh Colony, Gandhi Nagar, New Delhi)</i></p> <p>(ix) <i>Sukhmandar Singh @ Gopi (s/o late Gursewak Singh, r/o Village Tehna, District Faridkot, Punjab)</i></p> <p>(x) <i>Roofal @ Rahul Gill (s/o Sardari Lal, r/o Gali No. 1, New Kailash Colony, QadiyanChungi, Tehsil Batala, District Gurdaspur, Punjab)</i></p> <p>(xi) <i>Kuldeep Singh (s/o Dharam Singh, r/o Patti Fallian Di, Khadoor Sahib,</i></p>
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			<p><i>District Tarn Taran, Punjab)</i></p> <p>(xii) <i>Gopi (r/o Guru Gobind Singh Nagar, District Bathinda)</i></p> <p>(xiii) <i>Pargat Singh (s/o Mehar Singh, r/o H. No. 137, Village Tarmala, Tehsil Malout, District Muktsar, Punjab)</i></p> <p>(xiv) <i>Name unavailable</i></p>	
7.	<i>FIR No. 179 dated 22.10.2018 u/s 25 Arms Act at PS Samana, Patiala</i>	<i>Accused German Singh was the mastermind of the incident of looting of arms from Chausana Police Chowki in Shamli, Uttar Pradesh on 02.10.2018. He was arrested on 18.10.2018 from Bikaner, Rajasthan, along with recovery of one rifle and two pistols. German Singh was highly influenced by the propaganda of SFJ and wanted to target SAD/Badal leader Sukhbir Singh Badal for avenging the Police</i>	<p>(02)</p> <p>(i) <i>German Singh (s/o Kulwant Singh, r/o Azizpur, PS Jhinhana, Shamli, Uttar Pradesh)</i></p> <p>(ii) <i>Ishwar Singh (s/o Rajinder Singh, r/o H. No. 439, Adarsh Colony, Balongi, Kharar, Mohali, Punjab)</i></p>	<i>Not available</i>

		<i>firing at Behbal Kalan, whereas accused Ishwar Singh sought to eliminate Baba Ajit Singh of DamdamiTaksal/ Chowk Mehta.</i>		
8.	FIR No. 132 dated 31.10.2018, u/s 13/16/18/20 UA(P)A, 3/4/5 Explosive Substances Act, 25 Arms Act & 120-B IPC at PS Lahori Gate, Division No. 4, Patiala	<i>The case was relating to busting of a 'Referendum' module handled by one Shabnamdeep Singh, self-styled founder of 'Khalistan Gadar Force', who was indoctrinated by Pakistan based Gopal Singh Chawla and Harmeet Singh @ PhD (since dead). Police recovered one country made pistol, six cartridges, one hand grenade and letter pads belonging to 'Khalistan Gadar Force' from Shabnamdeep Singh.</i>	(05) (i) <i>Shabnamdeep Singh (s/o Jasbeer Singh, r/o Daftariwala, Burar, Samana, District Patiala, Punjab)</i> (ii) <i>Gursewak Singh (s/o Labh Singh, r/o Ratangarh, Chhindrah, PS Dirba, Sangrur, Punjab)</i> (iii) <i>Jatinder Singh @ Binder (r/o Fatehpur Majri, PS Samana, District Patiala, Punjab)</i> (iv) <i>Ramesh Kumar (s/o Mia Singh, r/o Riwar Jagir, village Ghuhla, PS Cheeka, district Kaithal, Haryana)</i>	<i>The case is under trial. All the accused except module leader Shabnamdeep Singh have been granted bail.</i>

			(v) <i>Vinod Kumar (s/o Mewa Singh, r/o Ward No. 4, Amba Colony, PS Cheeka, district Kaithal, Haryana)</i>	
9.	FIR No. 03 dated 15.03.2019 u/s 25/54/59 Arms Act & 13 UA(P)A at PS SSOC Amritsar	On 15.03.2019, SSOC Amritsar arrested the three accused near Amritsar bus stand, along with recovery of one magazine of .32 bore pistol and five live cartridges. Later, posters/ pamphlets of 'Referendum 2020' were also recovered from accused Baljit Singh.	(03) (i) <i>Baljit Singh (s/o Karnail Singh, r/o near Cheema Dairy, FatehgarhChurian Road, Ajnala, District Amritsar, Punjab)</i> (ii) <i>Jagdev Singh @ Jagga (s/o Mukhtiar Singh, r/o Gurdwara 6th Patshahi, Baba Bakala, District Amritsar, Punjab)</i> (iii) <i>Manjit Singh (s/o Sawinder Singh, r/o Village Jharunangal, Kilchian, District Amritsar, Punjab)</i>	The case is under trial. Accused Manjit Singh was released on bail. The rest two accused have not been granted bail.
10.	FIR No. 25 dated 21.03.2019 u/s 121, 124-A IPC PS Anandpur Sahib, District Ropar	On 21.03.2019, a Mahindra tractor without number plate was found roaming around the city of	00	Under investigation

11.	FIR No. 26 dated 21.03.2019 U/S 121, 124-A IPC PS Anandpur Sahib District Ropar	Anandpur Sahib. The tractor was carrying/ displaying banner of 'Referendum 2020' and the persons riding the tractor gave violent speeches.		
12.	FIR No. 111 dated 15.08.2019 u/s 25/54/59 Arms Act at PS City-2, Mansa	The case was registered against the six accused, after they were found in possession of one country made pistol and 20 live cartridges. The accused were promoting 'Khalistan Referendum' in their locality in Mansa were intending to target Shiv Sena leader Harminder Pal Bansal. Notably, two of the accused in this case, viz. Pardeep Singh and Hardam Singh, had earlier pasted pro-Khalistan banners outside the office of Harminder Pal Bansal at Mansa City in August 2018. In this connection, another case was registered (Sl. No. 5) at PS City-1, Mansa and the duo remained lodged in prison for some time.	(06) (i) Pardeep Singh (s/o Nirpal Singh, r/o Ward No. 2, Mansa, Punjab) (ii) Hardam Singh (s/o Tek Singh, r/o Ward No. 26, Mansa, Punjab) (iii) Balwinder Singh Aulakh (r/o Ward No. 1, Mansa, Punjab) (iv) Gurmeet Singh (s/o Prem Singh, r/o Ward No. 6, Mansa, Punjab) (v) Sandeep Singh (s/o Ruldu Singh, r/o Ward No. 25, Mansa, Punjab) (vi) Rajinder Singh (s/o Kashmir Singh, r/o Ward	Not available

			<p>No. 25, Mansa, Punjab)</p> <p>(Two of these six accused are also booked in another case in the list at Sl. No. 5)</p>	
13.	FIR No. 7 dated 01.02.2020 u/s 384, 387, 506, 294, 385 IPC at PS Phase-XI, Mohali	The case was related to busting of a module of self-radicalized youths, who were promoting 'Khalistan Referendum' in their locality as per instructions of their Pakistan handlers as well as planning to commit targetted killing of leaders of right wing Hindu outfits.	<p>(04)</p> <p>(i) Brahmjot Singh (s/o Baljeet Singh, r/o village Khudda Khurd, PS Mahesh Nagar, Ambala Cantonment, Haryana)</p> <p>(ii) Harshdeep Singh (s/o Sukhdev Singh, r/o village Ghardola, PS Chhapar, District Yamunanagar, Haryana)</p> <p>(iii) Amandeep Singh (s/o Satpal Singh, r/o H. No. 766, Basant Nagar, Jagadhari, Yamunanagar, Haryana)</p> <p>(iv) Ravi Kumar @ Ravi Singh Khalsa (s/o Shiv Kumar, r/o village Barri</p>	Not available

			Rasaur, PS Naraingarh, Ambala, Haryana)	
14.	FIR No. 5 dated 10.04.2020 at PS SSOC Mohali u/s 124A IPC, 10A, 13(1) UA(P)A	The case is related to dissemination of seditious content by SFJ through Tele Marketing	00	Under investigation
15.	FIR No. 6 dated 10.04.2020 at PS SSOC Mohali u/s 124A IPC, 10A, 13(1) UA(P)A	calls during first wave of Covid-19 lockdown.	00	Under investigation
16.	FIR No. 7 dated 10.04.2020 at PS SSOC Mohali u/s 124A IPC, 10A, 13(1) UA(P)A		00	Under investigation
17.	FIR No. 12 dated 12.04.2020 u/s 120B, 124A IPC, 49 Punjab Police Act 2007 & 10/13 UA(P)A 1967 at PS SSOC Mohali, District Mohali	The case was registered against SFJ and Gurpatwant Singh Pannun in connection with seditious tele-marketing calls made to random people in Punjab during the first wave of Covid lockdown.	00	Under investigation
18.	FIR No. 116 dated 06.06.2020 u/s 295, 295A, 120, 120B, 121A, 153A IPC & 13 UA(P)A at PS Chattiwind, District Amritsar	The two accused were in contact with several Pak entities and were conspiring to smuggle weapons from Pakistan for the purpose of eliminating one Ludhiana based Shiv Sena leader. They were also in contact with UK based SFJ leader	(02) (i) Avtar Singh Rana (s/o Gurnam Singh, r/o H. No. 514, Village Kale, PS Bhikiwind, District Tarn Taran, Punjab) (ii) Jasbir Singh (s/o Sadha Singh, r/o	The case is under trial.

		<i>Kulwant Singh @ Maan Singh Khalsa and were paid INR 2,000/- for creating a WhatsApp group for SFJ.</i>	<i>Village Wara Sher Singh, District Tarn Taran, Punjab)</i>	
19.	FIR No. 43 dated 19.06.2020 u/s 124A, 131, 153A and 10A, 13(1) UA(P)A at PS Sadar Kurali, District Mohali.	<i>The case was filed against SFJ for making tele marketing calls offering Indian Army personnel INR 5000 extra payment for quitting Indian Army.</i>	00	<i>The case was taken over by the NIA and re-registered as RC-12/2021/NIA/DLI dated 18.06.2021</i>
20.	FIR No. 168 dated 02.07.2020 u/s 2 of the Prevention of in search to national honour at 1971, 504/124A/153A IPC 10A/13(1) UA(P)A, 3 of ST/SC Act at PS B division, District Amritsar.	<i>The case was lodged against Gurpatwant Singh Pannun for hurting the sentiments of the Dalit community by burning the Constitution of India and the Indian national flag. The compliant was brought by Amritsar based activist Loveleen Mattu (Chairman, Dalit Suraksha Sena).</i>	00	<i>Open ended arrest warrant was issued against Gurpatwant Singh Pannun on 25.01.2021 by the Court of Additional District & Sessions Judge-I, Amritsar.</i>
21.	FIR No. 49 dated 02.07.2020 u/s 10A/10B/11/13(1)/17 UA(P)A at PS Bholath, Kapurthala	<i>The case was filed against Italy based SFJ activist Joginder Singh @ Goga for propagating 'Khalistan Referendum' in his locality. He was arrested during his visit to India in 2020.</i>	(01) (i) Joginder Singh @ Goga (Indian national, DoB: 02.01.1955, s/o Avtar Singh, PP No. U0921538, o/r/o VPO Akala, PS Bholath, District Kapurthala, Punjab, p/r/o G	<i>The case is currently under trial. Joginder Singh was granted bail on 30.07.2020.</i>

			Market Via Gambara – 21, 25020 Praibiono, Brescia, Italy)	
22.	FIR No. 136 dated 14.08.2020 u/s 120B, 115, 121, 121A, 124A, 153A, 153B, 506 IPC and Section 2 of the Prevention of Insult to National Honour Act, 1971, Section 66F of the IT Act and Section 10/11/13 UA(P)A at PS Moga City-1, district Moga	The case was registered in connection with the Khalistani flag hoisting case atop the DC Office, Moga on August 14, 2020.	(04) (i) Inderjeet Singh Gill (s/o Jagraj Singh Gill, r/o H. No. 9, Patti Meeru Guddu, VPO Rauli, PS Mehna, District Moga, Punjab) (ii) Jaspal Singh @ Ampa (s/o Chamkaur Singh, r/o Patti Meeru Guddu, VPO Rauli, PS Mehna, District Moga, Punjab) (iii) Akashdeep Singh @ Sajan (r/o Village Sadhuwala, district Ferozepur, Punjab) (iv) Jagwinder Singh Grewal @ Jagga	The case was taken over by the NIA and re-registered as RC-30/2020/NIA/DLI dated 04.09.2020.
23.	FIR No. 34 dated 30.08.2021 u/s 153, 153A, 124A IPC, 10(a)/13(1) UA(P)A 1967 at PS SSOC Mohali, District Mohali	The case was registered against Gurpatwant Singh Pannun and his associates for promoting violent extremist action and issuing death threat to	00	Under investigation

		<i>then Punjab CM Capt. Amarinder Singh.</i>		
24.	FIR No. 07 dated 16.09.2021 u/s 153A, 153B, 124A, 120B IPC, 17/18/20/40 UA(P)A 1967 at PS SSOC Mohali, District Mohali	<i>The case is related to busting of a 'Referendum' module which was involved in smuggling and circulating 'Referendum voters' registration forms' in Punjab. Over 2.84 lac Referendum pamphlets were recovered from the module members, apart from one printer and other graffiti writing paraphernalia.</i>	(04) (i) Gurwinder Singh @ Baba (s/o Harpreet Singh, r/o Village Rampur, PS Payal, District Ludhiana, Punjab) – Bail application rejected on 14.02.2022 (ii) Sukhdev Singh @ Rinku (s/o Karnail Singh, r/o Morinda, district Ropar, Punjab) – Bail application rejected on 14.02.2022 (iii) Jagwinder Singh (s/o Gurmail Singh, r/o Morinda, district Ropar, Punjab) – Bail application rejected on 26.10.2022 (iv) Jashandeep Singh Mangat (DoB: 14.01.2004, s/o Gurmeet Singh, r/o Village Rampur, PS Payal, District Ludhiana, Punjab)	<i>The case is under trial. None of the accused has been granted bail, except for Jashandeep Singh Mangat.</i>

			(Two of these four accused are also booked in another case in the list at Sl. No. 25.)	
25.	FIR No. 154 dated 17.09.2021 u/s 124A, 153A, 153B, 120B IPC at PS Dehlon, district Ludhiana	The case is related to busting of the same SFJ/Referendum module, as mentioned at Sl. No. 21. Two of the four foot soldiers of SFJ, arrested in the previous case, were subsequently found to have written pro-Khalistan graffiti along the road of village Gill, district Ludhiana earlier in the intervening night of August 18/19, 2021. Hence, a case was registered against the duo afresh.	(02) (i) Gurwinder Singh @ Baba (s/o Harpreet Singh, r/o Village Rampur, PS Payal, District Ludhiana, Punjab) (ii) Jashandeep Singh Mangat (DoB: 14.01.2004, s/o Gurmeet Singh, r/o Village Rampur, PS Payal, District Ludhiana, Punjab) (These two accused are also booked in another case in the list at Sl. No. 24.)	The case is under trial. Accused Gurwinder Singh's bail application was rejected, while Jashandeep Singh, being a juvenile at the time of committing the crime, was granted bail.
26.	FIR No. 144 dated 26.12.2021 u/s 153-A, 505(2), 505(3), 120-B IPC at PS Banur, Tehsil Rajpura, district Patiala	The case was registered against the trio, who was involved in writing seditious graffiti in promotion of SFJ-run 'Khalistan Referendum' at village Khanpur, PS Sirhind, district Fatehgarh Sahib on December 26, 2021. They had also distributed pamphlets of	(03) (i) Jagmeet Singh (s/o Kuldeep Singh & Jasvir Kaur, r/o H. No. 1820/5, Block No. 5, Housefed Society, Banur, District Patiala, Punjab)	The case is under trial.

		<p><i>'Khalistan Referendum' and the so-called 'voter registration forms' among the people attending the 'Shaheedi Jor Mela' at Sirhind, Fatehgarh Sahib during December 25-27, 2021. Earlier on April 27, 2021, accused Jasvir Kaur had also received a consignment of 10000 'voter registration forms' from the aforesaid Jagwinder Singh (s/o Gurmail Singh, r/o Morinda, district Ropar, Punjab – accused in the case at Sl. No. 21). The incriminating material was printed at the printing press, installed at the residence of the aforesaid Gurwinder Singh (s/o Harpreet Singh, r/o Village Rampur, PS Payal, District Ludhiana, Punjab – accused in the cases at Sl. No. 21 & 22).</i></p>	<p>(ii) <i>Jasvir Kaur (mother of the aforesaid Jagmeet Singh, w/o Kuldeep Singh, r/o H. No. 1820/5, Block No. 5, Housefed Society, Banur, District Patiala, Punjab)</i></p> <p>(iii) <i>Ravinder Singh (s/o Nirbhai Singh, r/o Village Jasra Mandi, Gobindgarh, district Fatehgarh Sahib, Punjab)</i></p>	
27.	FIR No. 52 dated 13.04.2022 u/s 124A, 153A, 153B, 120B IPC, 13/16/18 UA(P)A 1967	The case was registered against unknown persons after a Khalistani flag was found tied to the	(02) (i) <i>Harvir Singh @ Raju (s/o late Rajinder Singh, r/o Ward No. 1, Sugar</i>	The case is under trial. Both the accused have

	<i>at PS City Rupnagar, district Ropar</i>	<i>boundary fencing of Ropar District Administrative complex in the late night hours of April 12, 2022. After the arrest of two persons from Ropar by Himachal Pradesh Police a month later in connection with the incident of fixing Khalistan flags and painting pro-Khalistan graffiti outside Himachal Pradesh State Assembly Complex on May 08, 2022 (Sl. No. 64), it was found that they were also involved in the former incident in Ropar. Thus their names were included in this case as accused, along with the name of Gurpatwant Singh Pannun. Known radical lawyer Imaan Singh Khara is defending the accused in the case.</i>	<i>Mill Road, Morinda, Ropar, Punjab)</i> <i>(ii) Paramjit Singh @ Pamma (s/o Mehar Singh, r/o Village Rurhki Heera, Chamkaur Sahib, district Ropar, Punjab)</i> <i>(Both the accused are also accused in two more cases in the list at Sl. No. 60 & 73.)</i>	<i>been denied bail.</i>
28.	<i>FIR No. 24 dated 02.05.2022 u/s 124A, 153, 153A, 153B, 120B, 505(1), 506 IPC & 10/13 UA(P)A 1967 at PS State Cyber Crime, district Mohali</i>	<i>The case was registered against SFJ and Gurpatwant Singh Pannun after issuance of a seditious call through video message.</i>	00	<i>Under investigation</i>

29.	FIR No. 42 dated 02.06.2022 u/s 153B IPC at PS Kalanaur, district Gurdaspur	The case was related to writing of pro-Khalistan graffiti at different places of city Kalanaur, Gurdaspur in the intervening night of June 01/02, 2022.	00	Under investigation
30.	FIR No. 27 dated 04.06.2022 u/s 153, 153A, 153B, 505(1), 506 IPC, 10/13 UA(P)A 1967 at PS State Cyber Crime, Mohali	The case was registered after a seditious video message of Gurpatwant Singh Pannun was released, wherein he called upon Sikh soldiers serving in Indian Army for mutiny and to reach Akal Takht on June 06, 2022 on the occasion of Ghallughara anniversary.	00	Under investigation
31.	FIR No. 69 dated 06.06.2022 u/s 121, 121A IPC at PS E-Division, Amritsar	The two arrested self-radicalized youths, influenced by the propaganda of SFJ, raised pro-Khalistan slogans at the premises of Akal Takht on June 06, 2022.	(02) (i) Manjit Singh @ Baba Shaheed (s/o Kundan Singh, r/o Vilalge Lor Kalan, PS Sadar, District Gurdaspur, Punjab) (ii) Saudagar Singh (s/o Nand Singh, r/o Village Virk, District Ludhiana, Punjab)	The case is under trial before the District & Sessions Court, Amritsar. Both the accused were granted regular bail on 28.08.2023 by the Court of Justice Deepak Gupta. Next date of hearing of the

				case is on 24.01.2024.
32.	FIR No. 201 dated 11.06.2022 u/s 153A, 153B, 120B IPC, 13/16/18 UA(P)A and Section 3 of Punjab Prevention of Defacement of Public Property Act 1985 at PS City Faridkot, district Faridkot	The case was related to writing of pro-Khalistan graffiti on the walls of Talwandi Road-Faridkot bridge on June 11, 2022. The culprit in the case was later arrested by Haryana Police from Karnal on July 03, 2022 in connection with another graffiti incident (June 19/20, 2022) in Karnal.	(01) Manjit Singh @ Meet (s/o Late Harjinder Singh, r/o Village Duladi, Nabha district Patiala, Punjab) (The same person is accused in three more cases in the list at Sl. No. 34, 35 & 61.)	The case is under trial. Bail application of Manjeet Singh was rejected by the Court on 01.06.2023.
33.	FIR No. 130 dated 13.06.2022 u/s 153A, 153B, 120B IPC, 13/16/18 UA(P)A 1967 and Section 3 of Punjab Prevention of Defacement of Public Property Act 1985 at PS Sadar Ferozpur, district Ferozpur	The case was related to writing of pro-Khalistan graffiti on the front wall of the office of DRM Ferozpur in the intervening night of June 12/13, 2022.	00	Under investigation
34.	FIR No. 76 dated 15.06.2022 u/s 124A, 153A, 153B, 120B IPC, 13 UA(P)A & Section 3 of Punjab Prevention of Defacement of Public Property Act 1985 at PS Division-3, Jalandhar	The case was related to writing of pro-Khalistan graffiti outside Devi Talav Mandir, Jalandhar in the intervening night of June 14/15, 2022. The culprit in the case was later arrested by Haryana Police from Karnal on July 03, 2022 in connection with	(01) Manjit Singh @ Meet (s/o Late Harjinder Singh, r/o Village Duladi, Nabha district Patiala, Punjab) (The same person is accused in three more cases in the list at Sl. No. 32, 35 & 61.)	The case is under trial. The accused was granted bail on 16.05.2023.

		<i>another graffiti incident (June 19/20, 2022) in Karnal.</i>		
35.	FIR No. 116 dated 20.06.2022 u/s 153A, 153B, 120B IPC, 13/18 UA(P)A 1967 and Section 3 of Punjab Prevention of Defacement of Public Property Act 1985 at PS City Sangrur, district Sangrur	<i>The case was registered in connection with writing of pro-Khalistan graffiti on the walls of Mahakali Devi temple, Sangrur in the intervening night of June 19/20, 2022. Accused Resham Singh was subsequently arrested by Punjab Police on 27.06.2022 and accused Manjeet Singh was arrested by Haryana Police from Karnal on 03.07.2022.</i>	(02) (i) Manjeet Singh @ Meet (s/o Late Harjinder Singh, r/o Village Duladi, Nabha district Patiala, Punjab) (ii) Resham Singh (uncle of aforesaid Manpreet Singh, s/o Pala Singh, r/o Village Hamidi, PS Thuliwal, District Barnala, Punjab) (Accused Manjit Singh is booked in three more cases in the list at Sl. No. 32, 34 & 61. Accused Resham Singh is booked in two more cases in the list at Sl. No. 36 & 61.)	<i>Since both these cases are registered under the same PS within a span of one week in two alike cases committed by the same group of culprits, single trial is going on in the two cases. Accused Kulwinder Singh, Resham Singh and Manjeet Singh were last denied bail on 27.07.2023. Pertinently, accused</i>
36.	FIR No. 118 dated 27.06.2022 u/s 153A, 153B, 427, 120B IPC, 13/18 UA(P)A and section 3 Punjab Prevention of Defacement Property Ordinance Act 1997 at PS City Sangrur, District Sangrur	<i>The case was registered in connection with writing of pro-Khalistan graffiti (June 26/27, 2022) on the boundary wall of Water Testing Regional Laboratory, Sangrur and Ranbir Club, Sangrur.</i>	(03) (i) Manpreet Singh (s/o Kulwinder Singh, r/o Village Pindi Kehar Singh, PS Longowal, District Sangrur, Punjab)	<i>Manpreet Singh was just 18-year-old at the time of the incident. Investigations revealed that his maternal uncle Resham Singh was the</i>

			<p>(ii) <i>Kulwinder Singh (father of aforesaid Manpreet Singh, s/o late Lal Singh, r/o Village Pindi Kehar Singh, PS Longowal, District Sangrur, Punjab)</i></p> <p>(iii) <i>Resham Singh (maternal uncle of aforesaid Manpreet Singh, s/o Pala Singh, r/o Village Hamidi, PS Thuliwal, District Barnala, Punjab)</i></p> <p>(Accused Resham Singh is booked in two more cases in the list at Sl. No. 35 & 61.)</p>	<p><i>main culprit in the incident and his (Manpreet Singh) presence at the crime site was ensured through manipulation. Manpreet Singh was not privy of the actual seditious plans of his maternal uncle. Thus, his name was subsequently removed from the case.</i></p>
37.	FIR No. 66 dated 30.06.2022 u/s 121A, 124A, 153A, 120B IPC and u/s 66A/66F IT Act, 2000 at PS Cantonment, Jalandhar	The case was related to writing of pro-Khalistan graffiti on the walls of Punjab Armed Police headquarters, Jalandhar. The case was initially registered against unknown persons, Later, three members of the module responsible for the act were arrested between September 07 and September 09, 2022.	(03) (i) <i>Raman Singh Gill @ Sonu (s/o late Manjit Singh, o/r/o Village Nag Kalan, PS Majitha, district Amritsar, p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha, Fatehgarh Churian Road, Amritsar)</i>	The case is under trial.

			<p>(ii) <i>Sam Masih (s/o Kashmir Singh, o/r/o Village Gadrian, PS Batala, District Gurdaspur, Punjab, p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatia, Fatehgarh Churian Road, Amritsar)</i></p> <p>(iii) <i>Lakhwinder Singh @ Lakha @ Hargun(s/o Manjit Singh, o/r/o Village Jethuwal, PS Heer Kambo, district Amritsar, p/r/o H. No. 1727, Ishwar Nagar, Tarn Taran Road, Dist. Amritsar)</i></p> <p><i>(Raman Singh Gill and Lakhwinder Singh are accused in three more cases in the list at Sl. No. 41, 42 & 74, while Lakhwinder Singh is accused in two more cases at Sl. No. 42 & 74.)</i></p>	
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38.	FIR No. 77 dated 04.07.2022 u/s 153B IPC at PS Dera Baba Nanak, district Gurdaspur	The case was related to writing of pro-Khalistan graffiti on the walls of SDM Office and at the premises of Dera Baba Nanak bus stand in the intervening night of July 03/04, 2022.	00	Under investigation
39.	FIR No. 89 dated 07.07.2022 u/s 120B, 153B IPC and 10/13/18 UA(P)A 1967 at PS Dyalpura, District Bathinda	The case was related to writing of pro-Khalistan graffiti on the walls of the Dera of DSS, Sabalatpura, Bathinda in the intervening night of July 06/07, 2022	00	Under investigation
40.	FIR No. 148 dated 15.07.2022 u/s 153A IPC and section 3 Punjab Prevention of Defacement Property Act at PS Kotwali, District Patiala	The case is related to writing of pro-Khalistan graffiti on the walls of Kali Mata Temple, Patiala in the intervening night of July 14/15, 2022.	(02) (i) Harwinder Singh @ Prince (r/o village SalempurSekhan, Tehsil Rajpura, District Patiala) (ii) Prem Singh @ Ekam (r/o village SalempurSekhan, Tehsil Rajpura, District Patiala)	The case is under trial. None of the two accused has been granted bail.
41.	FIR No. 65 dated 11.08.2022 u/s 2 Prevention of Insult to National Honours Act at PS GRP Amritsar	The case was registered in connection with surfacing of a video on 11.08.2022 on social media, featuring one youth burning the Indian national flag at Majitha Railway crossing, Amritsar. The	(02) (i) Raman Singh Gill @ Sonu (s/o late Manjit Singh, o/r/o Village Nag Kalan, PS Majitha, district Amritsar; p/r/o	The case is under trial.

		<p><i>other person involved in the incident had filmed the act. Initially, the case was registered against unknown persons, Later, two members of a module responsible for the act were arrested between September 07 and September 09, 2022.</i></p>	<p><i>Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha, FatehgarhChurian Road, Amritsar)</i></p> <p><i>(ii) Lakhwinder Singh @ Lakha @ Hargun(s/o Manjit Singh, o/r/o Village Jethuwal, PS Heer Kambo, district Amritsar, p/r/o H. No. 1727, Ishwar Nagar, Tarn Taran Road, Dist. Amritsar)</i></p> <p><i>(Raman Singh Gill and Lakhwinder Singh are accused in three more cases in the list at Sl. No. 37, 42 & 74.)</i></p>	
42.	<p><i>FIR No. 102 dated 28.08.2022 u/s 76-A, 121-A, 124-A, 153-A, 120-B IPC & 66A/66F IT Act, 2000 at PS Navi Baradari, district Jalandhar</i></p>	<p><i>The case was registered in connection with the incident of defiling of a statue of Beant Singh (ex-CM, Punjab) at BMC Chowk, Jalandharin the wee hours of August 28, 2022, on which pro-Khalistan slogans were spray painted. The case was initially registered</i></p>	<p><i>(03)</i></p> <p><i>(i) Raman Singh Gill @ Sonu (s/o late Manjit Singh, o/r/o Village Nag Kalan, PS Majitha, district Amritsar, p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha,</i></p>	<p><i>The case is under trial.</i></p>

		<p>against unknown persons, Later, three members of the module responsible for the act were arrested between September 07 and September 09, 2022.</p>	<p>FatehgarhChurian Road, Amritsar)</p> <p>(ii) Sam Masih (s/o Kashmir Singh, o/r/o Village Gadrian, PS Batala, District Gurdaspur, Punjab, p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha, FatehgarhChurian Road, Amritsar)</p> <p>(iii) Lakhwinder Singh @ Lakha @ Hargun(s/o Manjit Singh, o/r/o Village Jethuwal, PS Heer Kambo, district Amritsar, p/r/o H. No. 1727, Ishwar Nagar, Tarn Taran Road, Dist. Amritsar)</p> <p>(Raman Singh Gill and Lakhwinder Singh are accused in three more cases in the list at Sl. No. 37, 41 & 74, while Sam Masih is accused in two more cases at Sl. No. 37 & 74.)</p>	
43.	FIR No. 01 dated 03.01.2023 u/s 153-A,	On January 03, 2023, pro-Khalistan graffiti	00	Under investigation

	<i>153-B, 124-A IPC at PS Sadar, District Muktsar</i>	<i>were found written on the outer walls of SSP Office, Muktsar.</i>		
44.	<i>FIR No. 11 dated 24.01.2023</i> <i>153-B IPC at PS Thermal, District Bathinda</i>	<i>On January 24, 2023, pro-Khalistan slogans were found written on the wall of NFL, Bathinda.</i>	00	<i>Under investigation</i>
45.	<i>FIR No. 13 dated 24.01.2023</i> <i>u/s 153-B IPC at PS Canal Colony, District Bathinda</i>	<i>On January 24, 2023, pro-Khalistan slogans were found written on the wall of the office of Maharaja Ranjit Singh University, Bathinda.</i>	00	<i>Under investigation</i>
46.	<i>FIR No. 27 dated 14.03.2023</i> <i>u/s 153B, 427 IPC at PS Nathana, District Bathinda</i>	<i>In the intervening night of March 13/14, 2023, miscreants put up a Khalistan flag on Bathinda-Ambala railway track, at village Lehra Mohabbat, Nathana, District Bathinda, which was meant for carrying coal racks to Guru Hargobind Thermal Plant, Lehra Mohabbat.</i>	00	<i>Under investigation</i>
47.	<i>FIR No. 80 dated 18.03.2023</i> <i>u/s 145, 147, 153 Railway Act at PS GRP Amritsar</i>	<i>Miscreants, apparently responding to SFJ's disruptive calls during G-20 summit in Amritsar (March 15-17), removed about 10/12 pedrail clips on March 18, 2023 from the track between Jandiala and Tangra</i>	00	<i>Under investigation</i>

		<i>railway stations in Amritsar-Beas railway section.</i>		
48.	FIR No. 124 dated 02.06.2023 u/s 353-A, 353-B, 505 IPC at PS City Moga, district Moga	<i>The case was registered in connection with writing of pro-Khalistan graffiti on the wall of Moga bus stand ticket counter in the intervening night of June 01/02, 2023. Besides, one Khalistan flag was also put up in the complex of Moga bus stand.</i>	(02) (i) Daljeet Singh (s/o Gurdev Singh, r/o Village Chuhar Chak, District Moga, Punjab) (ii) Pritpal Singh (s/o Sukhchain Singh, r/o Village Gholiya Khurd, District Moga, Punjab)	<i>The case is under trail before the Court of CJM, District Court, Moga. First hearing into the case was held on 30.06.2023 and the next hearing is scheduled for 04.03.2024. Bail application of both the accused was rejected by the Court on 11.07.2023.</i>
49.	FIR No. 62 dated 05.09.2023 u/s 153 B IPC at PS GRP, Bathinda	<i>SFJ miscreants put up Kesari flag bearing inscription of 'Khalistan Referendum' across railway track (Bathinda-Mansa) near village Kotfatta, Bathinda on September 05, 2023.</i>	00	<i>Under investigation</i>
50.	FIR No. 119 dated 29.11.2023 u/s 153B IPC at PS GRP, Amritsar	<i>The incident was relating to inscribing of pro-Khalistan graffiti on two pillars of</i>	(02) (i) Harmanpreet Singh (s/o Kaku Singh, r/o Village Nasibpura,	<i>The case is under trial. Both the accused have</i>

		<i>Bhandari Bridge</i>	<i>Tehsil Talwandi Sabo, District Bathinda)</i>	<i>been granted bail on 20.01.2024.</i>
51.	Case No. 675 dated 29.11.2023 u/s 145B, 147 Railway Act at RPF Post, Amritsar (This case was separately registered by Railway Protection Force, Railway Station, Amritsar on the same incident.)	<i>(flyover of railway tracks and peripheral wall of Amritsar Railway Station in the intervening night of November 27/28, 2023.</i>	(ii) <i>Lovepreet Singh (s/o Jagseer Singh, r/o Ward No. 5, Village Kotshamir, District Bathinda)</i> (These two persons are also accused in three more cases in the list at Sl. No. 52, 75 & 94.)	
52.	FIR No. 233 dated 03.12.2023 u/s 153, 153-A, 505, 120-B IPC at PS Canal Colony, District Bathinda	<i>The case is related to arrest of two foot soldiers of SFJ on December 03, 2023 by Punjab Police.</i>	(02) (i) <i>Harmanpreet Singh (s/o Kaku Singh, r/o Village Nasibpura, Tehsil Talwandi Sabo, District Bathinda)</i> (ii) <i>Lovepreet Singh (s/o Jagseer Singh, r/o Ward No. 5, Village Kotshamir, District Bathinda)</i> (These two persons are also accused in four more cases in the list, at Sl. No. 50, 51, 75 & 94.)	<i>The case is under trial. Both the accused have been granted bail on 21.12.2023.</i>
53.	FIR No. 02 dated 17.01.2024 u/s 153, 153-A, 505, 120-B IPC at PS SSOC	<i>The case was related to busting of a module of SFJ by SSOC Mohali from Patiala on</i>	(03) (i) <i>Jagdish Singh @ Jagga (s/o Mangal Singh, o/r/o Village</i>	<i>The case is under investigation</i>

	<i>Mohali, District Mohali</i>	<i>17.01.2024, wherein three foot soldiers of the outfit were arrested, who were involved in at least three graffiti incidents in Haryana during past one year.</i>	<i>NathuMajra, PO Kauli, PS Kheri Gandian, district Patiala, p/r/o H. No. 138, Guru Gobind Singh Nagar; Rajpura, Patiala, Punjab)</i> <i>(ii) Devinder Singh (s/o Kulwant Singh, r/o Village Mandoli, Rajpura, district Patiala, Punjab)</i> <i>(iii) Manjeet Singh (s/o Kaka Singh, r/o Khanpur Gandian, Rajpura, district Patiala, Punjab)</i> <i>(Two of these three accused are also booked in another case in the list at Sl. No. 64.)</i>	
54.	<i>FIR No. 4 dated 23.01.2024 u/s 153A, 153B IPC & 66 IT Act at PS D Division, Amritsar</i>	<i>The case was registered against Gurpatwant Singh Pannun for issuing incriminating/communal statements on Durgiana temple (Amritsar) in the backdrop of the consecration ceremony of Ayodhya Ram Temple. In a video message released on</i>	00	<i>Under investigation</i>

		<p>23.01.2024, Pannun intimidated the management of Durgiana temple to hand over the keys to Darbar Sahib, Amritsar. Again on 25.01.2024, two threat calls were received on the landline number of Durgiana temple, wherein the caller introduced himself as one SFJ activist named Gurmeet Singh and threatened the temple President Laxmi Kanta Chawla and General Secretary Arun Khanna (BJP leader). The caller also threatened to demolish Durgiana temple through bomb explosion.</p>		
55.	<p>FIR No. 10 dated 31.01.2024 u/s 153A IPC at PS City Batala, district Gurdaspur</p>	<p>The case was registered in connection with pasting posters reading 'Khalistan Zindabad' on the walls near Kali Mata Mandir, Chakri Bazaar and Tibba Bazaar, Batala, Gurdaspur on January 31, 2024. Later the day, two youths were arrested in connection with the incident.</p>	<p>(02)</p> <p>(i) Balwinder Singh (DoB: 19.06.1997, s/o Harjit Singh, r/o Bouli Inderjeet, Batala, Gurdwara Sahib Wali Gali, PS City, Batala, District</p>	<p>Under investigation</p>

			<p>Gurdaspur, Punjab)</p> <p>(ii) Arpanjeet Singh (DoB: 10.10.2006, s/o Harjit Singh, r/o Bouli Inderjeet Batala, Gurdwara Sahib Wali Gali, PS City, Batala, District Gurdaspur, Punjab)</p>	
Haryana (13 cases)				
56.	FIR No. 137 dated 02.07.2020 u/s 124A, 153A IPC 10A, 13 UA(P)A at PS Bhondsi, district Gurgaon	The case was registered in the backdrop of SFJ's seditious call to the Sikhs in India to enrol themselves as 'voters' for the 'Referendum 2020' exercise, which was then announced for commencement on July 04, 2020.	00	Under investigation
57.	FIR No. 597 dated 12.07.2020 u/s 124A, 153A IPC, 10A, 13 UA(P)A at PS Thanesar City, Kurukshetra	The case was registered in connection with SFJ's call for commencing 'Referendum voters' registration' in Haryana at Gurdwara	00	Under investigation

		<i>ChhevinPatshahi, Kurukshetra on July 11, 2020.</i>		
58.	FIR No. 972 dated 23.12.2020 u/s 25 Arms Act, 120-B IPC & 10/13 of UA(P)A at PS Karnal Sadar, Karnal	<i>The case was registered after accused Tej Prakash & Akashdeep Singh were intercepted by the Police on December 23, 2020 at Karnal, along with two country made pistols, which they had procured from BTFK militant Rattandeep Singh (s/o Jagir Singh, r/o Rohad, Saffidon, District Jind, Haryana, p/r/o Karnal, Haryana, now released from jail). The accused were in contact with US based SFJ campaigner Gurmeet Singh (o/r/o Ludhiana, Punjab), who had tasked them to eliminate Amritsar based Shiv Sena leader Sudhir Suri (later killed on 04.11.2022) and Ludhiana based</i>	(02) (i) <i>Tej Prakash Singh @ Kaka (s/o Sukhwinder Singh, r/o Ward No. 1, Bazigar Basti, Doraha, Tehsil Payal, PS Khanna, District Ludhiana, Punjab)</i> (ii) <i>Akashdeep Singh @ Sonu (s/o Gurkibal Singh, r/o H. No. 529, r/o Guru Nanak College, Dauraha, Tehsil Payal, District Ludhiana, Punjab)</i>	<i>The case is under trial. Both the accused were denied bail.</i>

		<p><i>Congress leader Gursimran Singh Mand. Gurmeet Singh had introduced them to Rattandeep Singh for arranging weapon and had sent INR 4 lacs through WUMT in 6-7 instalments. Gurmeet Singh was also booked in this case.</i></p>		
59.	<p><i>FIR No. 52 dated 29.08.2021 u/s 124A, 153A, 506 IPC & 10-A/13 UA(P)A at PS Cyber Crime, Gurgaon</i></p>	<p><i>The case was registered against Gurpatwant Singh Pannun for issuing threat to Haryana CM Manohar Lal Khattar. In the aftermath of an incident of farmer-Police stand-off in Karnal on 28.08.2021, Pannun had announced a reward of USD 1 million for putting Haryana CM behind the bars.</i></p>	00	Under investigation
60.	<p><i>FIR No. 229 dated 29.04.2022 at PS Thanesar City, Kurukshetra, Haryana</i></p>	<p><i>The case was registered against Gurpatwant Singh Pannun and his associates after SFJ's foot soldiers put up pro-Khalistan banner outside the residence of DSP, Kurukshetra on 'Khalistan Declaration</i></p>	<p>(02) (i) Harvir Singh @ Raju (s/o late Rajinder Singh, r/o Ward No. 1, Sugar Mill Road, Morinda, Ropar, Punjab)</p>	The case is under trial.

		<i>Day' in pursuance to a call of SFJ.</i>	(ii) <i>Paramjit Singh @ Pamma (s/o Mehar Singh, r/o Village Rurhki Heera, Chamkaur Sahib, district Ropar, Punjab)</i> <i>(Both the accused are also accused in two more cases in the list at Sl. No. 27 & 73.)</i>	
61.	FIR No. 414 dated 20.06.2022 u/s 120-B, 153-A IPC and 13 UA(P)A at PS Civil Lines, Karnal	<i>The case was registered in connection with writing of pro-Khalistan graffiti on the walls of Dyal Singh College and DAV Public School, Karnal on June 19, 2022. One Manjeet Singh was arrested by Karnal Police in this connection on July 03, 2022, while another associate of the accused namely Resham Singh was arrested by Sangrur Police on July 01, 2022.</i>	(02) (i) <i>Manjeet Singh @ Meet (s/o Late Harjinder Singh, r/o Village Duladi, Nabha district Patiala, Punjab)</i> (ii) <i>Resham Singh (uncle of aforesaid Manpreet Singh, s/o Pala Singh, r/o Village Hamidi, PS Thuliwal, District Barnala, Punjab)</i> <i>(Accused Manjeet Singh is booked in three more cases in the list at Sl. No. 32, 34 & 35. Accused Resham Singh is booked in two more cases in the list at Sl. No. 35 & 36.)</i>	<i>The case is under trial. The accused have been denied bail.</i>
62.	FIR No. 31 dated 16.07.2022 u/s 120B,	<i>The case was registered against Gurpatwant</i>	00	<i>Under investigation</i>

	<i>124A, 336, 379 IPC, 03 PDPP Act 1984, 66F IT Act 2000, 10/13 UA(P)A 1967 and No. 37 Amendment 2012 and 150 Railway Act No. 24 of 1989 at PS Cyber Crime, District Hisar</i>	<i>Singh Pannun and his associates, after the former called upon Sikhs to dismantle railway track that is used for supplying coal to Rajiv Gandhi Thermal Power plant at Khedar, Hisar in the backdrop of then ongoing sit-in protest at the site on fly ash issue. Pertinently, movement of freight trains to the plant was disrupted briefly after 66 iron clips of this railway track were found removed (July 16, 2022) by unknown miscreants.</i>		
63.	FIR No. 627 dated 07.12.2022 u/s 120B, 124A IPC and 13 UA(P)A 1967 at PS City Mandi Dabwali, district Sirsa	<i>The case was related to a graffiti incident at Mandi Dabwali, Sirsa in the intervening night of December 06/07, 2022.</i>	00	<i>Under investigation</i>
64.	FIR No. 71 dated 04.03.2023 u/s 153A IPC at PS Sadar, Ambala City, district Ambala	<i>The case was related to hanging of a Khalistani flag and inscribing of pro-Khalistan graffiti on a bridge at Ambala-Hisar (NH-152) crossing on Delhi-Amritsar National Highway (NH-44) near Shambu Toll Plaza in Ambala in the</i>	(02) (i) Jagdish Singh @ Jagga (s/o Mangal Singh, o/r/o Village NathuMajra, PO Kauli, PS Kheri Gandian, district Patiala, p/r/o H. No. 138, Guru Gobind Singh	<i>Under investigation</i>

		<i>intervening night of March 3/4, 2023. The case was initially registered against unknown persons. Later, SSOC Mohali arrested the culprits from Patiala on 17.01.2024.</i>	<i>Nagar, Rajpura, Patiala, Punjab)</i> <i>(ii) Devinder Singh (s/o Kulwant Singh, r/o Village Mandoli, Rajpura, district Patiala, Punjab)</i> <i>(These two accused are also booked in another case in the list at Sl. No. 53.)</i>	
65.	FIR No. 81 dated 05.04.2023 u/s 13 UA(P)A & 120-B, 153B IPC at PS Ismailabad, Kurukshetra	<i>The case is related to writing of pro-Khalistan graffiti (intervening night of April 4/5, 2023) on a roadside wall on NH-152D (around 2 km away village Talheri, Kurukshetra, Haryana). Later, one Malak Singh Virk was arrested on 19.11.2023 in the case by Delhi Police, who was accused in two more graffiti incidents.</i>	<i>(01)</i> <i>(i) Malak Singh Virk (s/o Sukhchain Singh, r/o Village Talheri, Tehsil Pehowa, PO Malakpur, District Kurukshetra, Haryana)</i> <i>(He is accused in two more cases in the list at Sl. No. 68 & 89.)</i>	<i>The case is under trial.</i>
66.	FIR No. 148 dated 07.04.2023 u/s 120B, 124A, IPC & 13 UA(P)A, 1967 at PS Sirsa Sadar, District Sirsa	<i>In the intervening night of April 6/7, 2023, pro-Khalistan slogans were found written on the boundary walls of Air Force Station in Sirsa.</i>	<i>00</i>	<i>Under investigation</i>
67.	FIR No. 473 dated 31.07.2023 u/s 120-B, 124-A IPC & 13 UA(P)A, 1967 at PS	<i>The case was related to writing of pro-Khalistan graffiti on the walls of SDM office, Dabwali</i>	<i>00</i>	<i>Under investigation</i>

	<i>City Mandi Dabwali, district Sirsa</i>	<i>and sewage treatment plant, located near the SDM office on July 31, 2023.</i>		
68.	FIR No. 48 dated 05.09.2023 u/s 120-B, 124-A, 153B IPC & 13 UA(P)A, 1967 at PS GRP, Kurukshetra	<i>The case is related to writing of pro-Khalistan graffiti (September 4, 2023) on the walls of Kurukshetra railway station at Platform No. 1 targetting the G-20 summit in New Delhi (Sept. 9/10, 2023). The case was initially registered against Gurpatwant Singh Pannun and unidentified persons. Later, one Malak Singh Virk was arrested on 19.11.2023 in the case by Delhi Police, who was accused in two more graffiti incidents.</i>	(01) (i) <i>Malak Singh Virk (s/o Sukhchain Singh, r/o Village Talheri, Tehsil Pehowa, PO Malakpur, District Kurukshetra, Haryana)</i> (He is accused in two more cases in the list at Sl. No. 65 & 89.)	<i>The case is under trial.</i>
Gujarat (02 cases)				
69.	FIR No. 11191067230030 dated 11.03.2023 u/s 66F IT Act, 2000, 16(1)(b) UA(P)A and 153A, 153B(1)(c), 505(1)(b),	<i>Two MP based youths were arrested by Gujarat Police from Madhya Pradesh, who were involved in making pre-recorded voice calls</i>	(02) (i) <i>Rahul Dwivedi (s/o Harihar Prasad Dwivedi, r/o H. No. 15, Kushali Mohalla,</i>	<i>Not available</i>

	<i>120B IPC at PS Cyber Crime, Ahmedabad City</i>	<i>through SIMBox operation on behalf of SFJ to several civilians in Gujarat in March 2023, warning to storm Narendra Modi stadium (Gujarat) on March 09, 2023 targetting then scheduled India vs Australia cricket match.</i>	<i>Unchehara, District Satna, Madhya Pradesh)</i> <i>(ii) Narendra Omprakash Kushwaha (s/o Om Prakash Kushwah, r/o H. No. 12, Ward No. 13, Ichaul, PS Amarpatan, District Satna, Madhya Pradesh)</i>	
70.	<i>FIR No. 11191067230 dated 28.09.2023</i> <i>u/s 121A, 152(A), 152(B-1-C), 505(1-B), 120B IPC, 66F IT Act, 2000 and 16(1B) UA(P)A, 1967 at PS Cyber Crime, Ahmedabad</i>	<i>The case was registered against Gurpatwant Singh Pannun after a series of pre-recorded calls were made by SFJ from international numbers to random people in India, threatening to 'storm' the Narendra Damodardas Modi stadium in Ahmedabad on October 05, 2023 during the opening ceremony of ICC World Cup 2023.</i>	00	<i>Under investigation</i>
<i>Uttarakhand (01 case)</i>				
71.	<i>FIR No. 299/18</i> <i>u/s 153B IPC and 66 IT Act at PS Khatima, District US Nagar</i>	<i>The case was related to arrest of two Uttarakhand based SFJ sympathizer youths, who were promoting 'Khalistan Referendum'</i>	<i>(02)</i> <i>(i) Kulvinder Singh Cheema (r/o Udham Singh Nagar, Uttarakhand)</i>	<i>Not available</i>

		<i>through use of cyber medium.</i>	(ii) <i>Harjeet Singh Bhinder (r/o Udham Singh Nagar, Uttarakhand)</i>	
Himachal Pradesh (06 cases)				
72.	FIR No. 04 dated 31.07.2021 registered at PS Cyber Crime, Shimla u/s 124, 153A, 120B, 506 IPC, Sec 3 UA(P)A and 66C IT Act 2008	The case was related to receipt of pre-recorded threat call by one Baldev Singh Chauhan from ISD No. +1-203-906-1459, warning HP CM Jairam Thakur not to raise Indian national flag on the occasion of Independence Day 2021.	00	Under investigation
73.	FIR No. 77 dated May 08, 2022 u/s 153A, 153B IPC, 13 UA(P)A and Sec 3 of HP Open Places (Prevention of Disfigurement) Act at PS Dharamshala, Himachal Pradesh	The case was related to Khalistan flag hoisting incident outside Himachal Pradesh State Assembly Complex in the early morning hours of May 08, 2022.	(02) (i) <i>Harvir Singh @ Raju (s/o late Rajinder Singh, r/o Ward No. 1, Sugar Mill Road, Morinda, Ropar, Punjab)</i> (ii) <i>Paramjit Singh @ Pamma (s/o Mehar Singh, r/o Village Rurhki Heera, Chamkaur Sahib, district Ropar, Punjab)</i> (Both the accused are also accused in two more cases in the list at Sl. No. 27 & 60.)	The case is under trail. Both the accused have been denied bail.

74.	FIR No. 221 dated 08.09.2022 u/s 153A, 153B IPC at PS Boileauganj, District Shimla	The case was registered against unknown persons after some miscreants put up Khalistani Flag on the boundary wall of Jal Shakti Bhawan at Tutikandi, Shimla near its main entrance on 05.09.2022. The case was initially registered against unknown persons, Later; three members of the module responsible for the act were arrested between September 07 and September 09, 2022.	(03) (i) Raman Singh Gill @ Sonu (s/o late Manjit Singh, o/r/o Village Nag Kalan, PS Majitha, district Amritsar; p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha, FatehgarhChurian Road, Amritsar) (ii) Sam Masih (s/o Kashmir Singh, o/r/o Village Gadrian, PS Batala, District Gurdaspur, Punjab, p/r/o Baba Deep Singh Colony, Taj Palace Street, Nangli Bhatha, FatehgarhChurian Road, Amritsar) (iii) Lakhwinder Singh @ Lakha @ Hargun(s/o Manjit Singh, o/r/o Village Jethuwal, PS Heer Kambo, district Amritsar; p/r/o H. No. 1727, Ishwar Nagar, Tarn Taran	The case is under trial.
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			<p>Road, Dist. Amritsar)</p> <p>(Raman Singh Gill and Lakhwinder Singh are accused in three more cases in the list at Sl. No. 37, 41 & 42, while Sam Masih is accused in two more cases at Sl. No. 37 & 42.)</p>	
75.	FIR No. 230 dated 04.10.2023 u/s 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 at PS Dharamshala, Kangra	The case is related to the incident of writing of pro-Khalistan graffiti at several places of Dharamshala including the Chief Engineer's office and HP Jal Shakti Vibhag in the intervening night of October 3/4, 2023.	<p>(02)</p> <p>(i) Harmanpreet Singh (s/o Kaku Singh, r/o Village Nasibpura, Tehsil Talwandi Sabo, District Bathinda)</p> <p>(ii) Lovepreet Singh (s/o Jagseer Singh, r/o Ward No. 5, Village Kotshamir, District Bathinda)</p> <p>(These two persons are also accused in four more cases in the list, at Sl. No. 50, 51, 52 & 94.)</p>	The case is under investigation. Charge-sheet has not been filed yet.
76.	FIR No. 207 dated 29.11.2023 u/s 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act,	The case is related to the incident of sighting of pro-Khalistan graffiti at two places near Chintpurni Bus Stop, District Una, HP in the	<p>(03)</p> <p>(i) Arjinder Singh @ Jinder (s/o Taranjit Singh, r/o Village Sangh Dhesian, PS</p>	The two cases are under trial.

	<i>1985 at PS Dhera, district Kangra</i>	<i>intervening night of November 28/29, 2023.</i>	<i>Goraya, Tehsil Phillaur, District Jalandhar, Punjab)</i>	
77.	FIR No. 63 dated 29.11.2023 u/s 153A IPC & 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 at PS Chintpurni, district Una	<i>Although the two places where graffiti were inscribed were only 40 meters apart, the locations lied at the borders of two districts, Una and Kangra. Thus, one location of graffiti fell within Una district and another in Kangra. Hence, two separate cases were registered.</i>	(ii) <i>Phool Chand (s/o Ram Narayan, r/o Village Sangh Dhesian, PS Goraya, Tehsil Phillaur, District Jalandhar, Punjab)</i> (iii) <i>Harry (s/o Santokh Ram, r/o Village Surja, PS Goraya, District Jalandhar, Punjab)</i>	
Assam (03 cases)				
78.	FIR No. 729/20 on 10.06.2020 at PS Dhubri, District Dhubri, Assam vide u/s 107, 120A, 121, 153A, 153B IPC, Section 39 of UA(P)A and Section 66F of the IT Act, 2000	<i>The case was registered against SFJ on the complaint of one Aneesh Paul (s/o Naranyan Chandra Paul, r/o R.K. Mission Road, Ward No. 15, PO Khalilpur, PS Dhubri, District Dhubri, Assam).</i>	00	<i>Under investigation</i>
79.	FIR No. 02 dated 02.04.2023 at PS STF, Guwahati, Assam u/s 121, 124A, 506 IPC, 10/13/16/18 UA(P)A, 1967	<i>The case was registered w.r.t. seditious and disruptive calls of SFJ targeting then scheduled visit of Indian PM to Guwahati (Assam) on the occasion of Bihu.</i>	00	<i>Under investigation</i>
80.	FIR No. 03 dated 25.04.2023 at PS STF,	<i>The case was registered w.r.t. seditious and</i>	00	<i>Under investigation</i>

	<i>Guwahati, Assam u/s 120B, 121, 124A, 506 IPC, 10/13/16/18/20 UA(P)A, 1967</i>	<i>disruptive calls of SFJ w.r.t. incarceration of the 'Waris Punjab De' leaders in Dibrugarh Jail, Assam.</i>		
Delhi NCR (13 cases)				
81.	FIR No 179 dated 17.07.2020 u/s 124A IPC, 10(a)/13(1) UA(P)A 1967 at Special Cell, Delhi Police	The case was registered against Gurpatwant Singh Pannun and SFJ on the complaint of Puneet Singh Chandok (Indian World Forum).	00	Under investigation
82.	FIR No 28 dated 14.01.2021 u/s 18B, 20 UA(P)A 1967, 120-B IPC at PS Special Cell, Delhi Police	The case was registered against Gurpatwant Singh Pannun & SFJ for inciting youths to raise Khalistani flag at India gate on Republic Day 2021.	00	Under investigation
83.	FIR No. 49 dated 04.02.2021 u/s 124A, 153, 153A, 120B IPC at PS Cyber Cell, Delhi Police	This case is related to the Toolkit incident, involving Greta Thunberg, Disha Ravi and Canada based Poetic Justice Foundation.	00	Under investigation
84.	FIR No. 211 dated 09.08.2021 u/s 120B, 124A, 153 IPC & 13/18/18B/20/39 UA(P)A 1967 at PS Special Cell, Delhi Police	The case was registered against SFJ and Gurpatwant Singh Pannun in connection with a disruptive call, given ahead of the Independence Day 2021, calling for raising of Khalistan flag in New Delhi targeting then	00	Under investigation

		<i>ongoing farmers' protest at Delhi borders.</i>		
85.	FIR No. 06 dated 12.01.2022 u/s 153, 153A, 506 IPC & 13/18/20 UA(P)A 1967 at PS Cyber Cell, Delhi Police	<i>The case was registered against SFJ and Gurpatwant Singh Pannun in connection with a seditious call, given targetting then upcoming Republic Day celebrations in New Delhi.</i>	00	<i>Under investigation</i>
86.	FIR No. 18 dated 19.01.2023 u/s 120-B, 153-B IPC at PS Lodhi Colony, (Special Cell) Delhi Police	<i>This case is relating to the two-member module of SFJ (Vikram Singh & Balram Singh), which had written pro-Khalistan graffiti at 11 different locations of West Delhi district in the intervening night of January 18/19, 2023 on the instructions of their US based handler Gagandeep Singh.</i>	(02) (i) Vikram Singh (s/o Ashok Singh, r/o C- 61/A, Tilak Vihar, Tilak Nagar, Delhi) (ii) Balram Singh (s/o late Mahender Singh, o/r/o Village Jatoli Qadim, PS Deeg, District Bharatpur, Rajasthan, p/r/o H. No. 1109, Desu Street, Mahipalpur, Delhi)	<i>The case is under trial. The accused were granted bail on 24.03.2023.</i>
87.	FIR No. 28 dated 27.08.2023 u/s 153/153A/505 IPC & 03 Delhi Prevention of Defacement of Property Act at PS Nangloi Metro Station	<i>These two cases are related to the incident of writing of pro-Khalistan graffiti outside five metro stations and one school of West Delhi in the early morning hours</i>	(02) (i) Pritpal Singh Brar (s/o Gurlal Singh, r/o Village Dod, PS Baja Khana, Tehsil	<i>The case is under trial.</i>

88.	FIR No. 697 dated 28.08.2023 u/s 153/153A/505/34 IPC & 03 Delhi Prevention of Defacement of Property Act has been registered at PS Nangloi	of August 27, 2023 targetting the G-20 summit in New Delhi (Sept. 9/10, 2023). Two culprits involved in the incident (Pritpal Singh & Rajwinder Singh) were arrested (August 30/31, 2023) from Bathinda.	Jaito, District Faridkot, Punjab) (ii) Rajwinder Singh (s/o Jarnail Singh, r/o Village Gondhara, PS Baja Khana, Tehsil Jaito, District Faridkot, Punjab)	
89.	FIR No. 705 dated 28.09.2023 u/s 153,153A, 153B, 120B, 505 IPC & 03 Delhi Prevention of Defacement of Property Act at PS Kashmiri Gate, New Delhi	The case is related to writing of pro-Khalistan graffiti on Yudhishtir Setu flyover, ISBT Kashmiri Gate on September 27, 2023. Later, one Malak Singh Virk was arrested by Delhi Police from Mehmoodpur, Kaithal, Haryana on 19.11.2023 in the case, who was also found culprit in two more graffiti incidents in Haryana.	(01) (i) Malak Singh Virk (s/o Sukhchain Singh, r/o Village Talheri, Tehsil Pehowa, PO Malakpur, District Kurukshetra, Haryana) (He is accused in two more cases in the list at Sl. No. 65 & 68.)	Under investigation
90.	FIR No. 469 dated 18.12.2023 u/s 03 Delhi Prevention of Defacement of Public Property Act 2007 at PS Hari Nagar, New Delhi	The case was related to writing of pro-Khalistan graffiti on Metro Pillar No. 509 at Hari Nagar, New Delhi on 18.12.2023.	00 (The case was registered against unknown persons. However, it was later found that one Delhi based couple namely Lakhvinder Singh (s/o Jagdev Singh & Gurmeet Kaur, PP No. V1310570) and his	Under investigation

			wife <i>Inderpreet Kaur</i> (both r/o WZ-315B, Gali No. 18, Sant Garh, Tilak Nagar, New Delhi – 94) was the culprit. They fled to the US within hours of writing graffiti along with their two children (<i>Japjeet Singh & Jaskirat Singh</i>). They boarded flight for US from IGI Airport, New Delhi at 07:00 hours on 18.12.2023.)	
91.	FIR No. 106 dated 16.01.2024 u/s 3 Delhi Prevention of Defacement of Public Property Act 2007 at PS Nihal Vihar, West Delhi	The case is related to sighting of pro-Khalistan graffiti on 16.01.2024 at a wall on Nala Service Road, Machhli Pul, Chander Vihar. The graffiti content was on the proposed commencement of the so called 'Khalistan Referendum' in India on 26.01.2024. The case was registered against unknown persons.	00	Under investigation
92.	FIR No. 47 dated 19.01.2024 u/s 3 Delhi Prevention of Defacement of Public Property Act 2007 at PS Nihal Vihar, West Delhi	The case is related to inscribing of pro-Khalistan graffiti on the walls of Sarvodaya Bal Vidyalaya, Janta Flats, Hastal, Uttam Nagar, Delhi in the intervening	(01) (i) Sunny Singh (s/o Satpal Singh, r/o A-98, Shiv Vihar, Uttam Nagar, New Delhi)	The case is under investigation. The accused was released on bail/PR

		<i>night of January 18/19, 2024. The case was initially registered against unknown persons. Later, one Sunny Singh was arrested by Delhi Police on 31.01.2024 in connection with the incident.</i>		<i>bond on 02.02.2024.</i>
93.	FIR No. 75 dated 26.01.2024 u/s 3 Delhi Prevention of Defacement of Public Property Act 2007 at PS Tilak Nagar, New Delhi	<i>The case is related to inscribing of pro-Khalistan graffiti on the walls of a park near MCD Primary School, Mukherjee Park, Vishnu Garden, Delhi in the intervening night of January 25/26, 2024. The case was initially registered against unknown persons. Later, one Jaswinder Singh was arrested by Delhi Police on 31.01.2024 in connection with the incident.</i>	(01) (i) Jaswinder Singh @ Lucky (s/o Charanjeet Singh, r/o Plot No. 100, WZ-33, Chand Nagar, Tilak Nagar, New Delhi)	<i>The case is under investigation. The accused was released on bail/PR bond on 31.01.2024.</i>
Rajasthan (01 case)				
94.	FIR No. 56 dated 24.10.2023 u/s 153A, 153B, 505 IPC at PS GRP, Hanumangarh	<i>The case is related to writing of pro-Khalistan graffiti on the boundary wall of Hanumangarh Railway Station, district Hanumangarh (Rajasthan) on October 24, 2023. The case was</i>	(02) (i) Harmanpreet Singh (s/o Kaku Singh, r/o Village Nasibpura, Tehsil Talwandi Sabo, District Bathinda)	<i>The case is under investigation. The two accused were brought to Rajasthan from Punjab by GRP</i>

		registered against unknown persons.	(ii) Lovepreet Singh (s/o Jagseer Singh, r/o Ward No. 5, Village Kotshamir, District Bathinda) (These two persons are also accused in four more cases in the list at Sl. No. 50, 51, 52 & 74.)	Hanumangarh on 10.01.2024 on transit remand.
Chandigarh (01 case)				
95.	FIR No. 51 dated 26.01.2023 u/s 3 of Delhi Prevention of Defacement of Property Act at PS Sector-36, Chandigarh	On January 26, 2023, pro-Khalistan slogans were found written on a signboard in front of Beant Singh Memorial, Sector 42, Chandigarh	00	Under investigation
Jharkhand (01 case)				
96.	FIR No. 69 dated 19.02.2024 u/s 10/13 UA(P)A, 1967 & 66(F) IT Act, 2000 at PS Dhurwa, district Ranchi	The case was registered against Gurpatwatnt Singh Pannun for his disruptive call, wherein he had insisted England cricket team captain Ben Stokes to show solidarity with the protesting farmers (farmers' protest 2.0) by 'boycotting' the last match of India-England 04-match test series, which was scheduled to be held at Ranchi during February 22-26, 2024.	00	Under investigation

- **Cases registered by National Investigation Agency (NIA)**

Sl No.	Case Particulars	Brief background
1.	RC-02/2019/NIA/DLI u/s 120B, 124A, 153A, 153B, 505 IPC and 13/17/18 UA(P)A, 1967	Charge sheet was filed against Gurpatwant Singh Pannun and his associates on December 09, 2020. Government of India had attached the properties of Pannun at Village Khankot Amritsar, Punjab (46 Kanal) and at Village Sultanwind Amritsar, Punjab (11 Kanal 13.5 Marlas) under section 51A of UA(P)A, 1967 in connection with this case.
2.	RC-19/2020/NIA dated 05.04.2020 u/s 124A, 153A, 153B and 120B and 17/18/19 UA(P)A, 1967	FIR No 152/2020 dated 19.10.2018, registered at PS Sultanwind Amritsar, Punjab was re-registered by the NIA on April 05, 2020 under this case on the request of Government of Punjab. NIA filed charge sheet against Gurpatwant Singh Pannun and others in the case on December 18, 2020 at NIA, Special Court, Mohali, Punjab.
3.	RC-30/2020/NIA/DLI u/s 121, 121A, 124A, 153A, 153B IPC and Section 2 of Prevention of Insults to National Honours Act, 1972 registered at NIA Hqrs., New Delhi	This case is related to the incident of Khalistani flag hoisting at the DC Office, Moga on August 14, 2020. The case was initially registered at PS Moga City-I, district Moga vide FIR No. 136 dated 14.08.2020 u/s 115, 121, 121A, 124A, 153A, 153B, 506 IPC, Section 2 of the Prevention of Insult to National Honour Act, 1971, 66F IT Act & 10/11/13 UA(P)A. It was later taken over by the NIA.
4.	RC-40/2020/NIA/DLI dated 15.12.2020 u/s 120B, 124A, 153A, 153B IPC and 13/17/18/18B/20 UA(P)A, registered at NIA Hqrs., New Delhi	The case was registered on the basis of a communication of MHA sent to the Director, NIA regarding funding of then ongoing farmers' protest by Sikhs For Justice, Gurpatwant Singh Pannun and others. The Toolkit scam was also related to this.
5.	RC-12/2021/NIA/DLI dated 18.06.2021 u/s 124A, 131, 153A IPC and 10A/13(1) UA(P)A registered at NIA Hqrs., New Delhi	The case is related to the tele marketing calls made by SFJ during first wave of Covid-19, thereby offering Indian Army personnel INR 5000 extra salary for quitting Indian Army. The case was initially registered at PS Sadar Kurali, Mohali (FIR No. 43 dated 19.06.2020) u/s 124A, 131, 153A IPC & 10A/13(1) UA(P)A. It was later taken over by the NIA.

6.	RC-35/2021/NIA/DLI <i>dated</i> 30.12.2021 <i>u/s</i> 120A, 120B IPC and 10/13/17/18/18B UA(P)A registered at NIA Hqrs., New Delhi	<i>The case was related to the incident of IED blast at the District & Sessions court Complex, Ludhiana on 23.12.2021, which was masterminded by Germany based BKI militant as well as SFJ activist Jaswinder Singh Multani.</i>
7.	RC-22/2022/NIA/DLI <i>dated</i> 18.05.2022	<i>The case was related to the incident of recovery of IED from the Burail Jail, Chandigarh in April 2022, which was smuggled cross border by Germany based BKI militant and SFJ activist Jaswinder Singh Multani. The case was subsequently taken over by the NIA.</i>
8.	RC-30/2023/NIA/DLI <i>dated</i> 20.11.2023 <i>u/s</i> 120B, 153A, 506 IPC and 10/13/16/17/18/ 18B UA(P)A registered at NIA Hqrs., New Delhi	<i>The case was registered against Gurpatwant Singh Pannun over issuance of videos threatening people not to fly in Air India flights and announcing global blockade of operation of Air India flights on November 19, 2023, coinciding with the ICC World Cup 2023 final match.”</i>

10. In the aforesaid background, the Central Government, keeping in view the continuing subversive activities of SFJ, which are aimed at disrupting the sovereignty and territorial integrity of the country, extended the declaration of SFJ as an Unlawful Association for a further period of five years from 10th July, 2024 *vide* Notification No.S.O.2660(E) dated 08th July, 2024, subject to orders under Section 4 of the Act.

II. PROCEDURE FOLLOWED BY THIS TRIBUNAL

11. The matter was listed for hearing on 14th August, 2024 upon receiving the Reference pursuant to Section 4(1) of UA(P)A, along with documents as provided under Rule 5(i) and (ii) of Unlawful Activities (Prevention) Rules, 1968, *vide* communication dated 06th August, 2024 including the notifications dated 08th July, 2024 and 02nd August, 2024. On consideration of the material placed on record, this Tribunal was of *prima facie* opinion that notice be issued to ‘Sikhs for Justice (SFJ)’ to show-cause within thirty days, for purpose of adjudication, whether or not there is sufficient cause for extending the declaration of ‘Sikhs for Justice (SFJ)’ as an ‘Unlawful Association’, in terms of Notification No.S.O.3097(E) dated 02nd August, 2024. Accordingly, the notice was directed to be served on the association to show-cause as to why the said association be not declared unlawful and why order should not be made confirming the declaration made under sub-section (1) and (3) of Section 3 of the Act by the Central Government.

12. The notice of service was further directed to be served in the following manner:

- a)** by affixing a copy of the notification at some conspicuous part of the offices(s), if any, of the Association;

- b) by serving a copy of the notification, wherever possible, on the principal office-bearers, if any, of the Association;
- c) by proclaiming by beat of drums or by means of loudspeakers, the contents of the notification, in the area in which the activities of the Association are ordinarily carried on or are believed to be ordinarily carried on;
- d) by registered post/speed post/courier;
- e) by making announcement over radio/television from the local or nearest broadcasting station of the All India Radio/Doordarshan;
- f) by pasting the notification on the Notice Board of the office of the Deputy Commissioner/District Magistrate/Tehsildar at the Headquarters of each of the Districts in the State(s), where the activities of the Association are ordinarily carried on or are believed to be ordinarily carried on;
- g) by publication in the two National Newspapers in 'English' and 'Hindi' (All India Edition) and a daily newspaper in vernacular, circulating in the concerned State(s) in India, where the activities of the Association are ordinarily carried on or are believed to be ordinarily carried on; and
- h) by publishing on the website of the Ministry of Home Affairs (<https://www.mha.gov.in>).

13. In compliance to the directions of this Tribunal, affidavit of service of notice was placed on behalf of State of Rajasthan, Gujarat, Assam, Uttarakhand, Uttar Pradesh, Haryana, Himachal Pradesh, Jharkhand, Punjab, GNCT of Delhi, Union Territories of Chandigarh and Jammu & Kashmir, informing the factum of service of notice.

Also, an affidavit of service was placed on behalf of Union of India confirming the service on the respondent association (Sikhs for Justice 'SFJ'), supported with the reports from the Consulate General of India, Toronto, Canada; Consulate General of India at New York, USA and High Commission of India at London, UK.

14. Since none appeared on behalf of 'Sikhs for Justice (SFJ)' despite affidavits of service placed on record, 'Sikhs for Justice (SFJ)' was proceeded *ex parte vide* order dated 16th October, 2024.

III. PROCEDURE TO BE FOLLOWED IN EX-PARTE PROCEEDINGS

15. Despite non-appearance of the concerned organization, this Tribunal is mandated to make an "objective determination", to test the credibility of the material/evidence placed on record by the Union of India and to satisfy itself that the declaration of Unlawful Association is not made as per "*ipse dixit* of the Union of India", as observed by the Hon'ble Supreme Court in *Jamaat-E-Islami Hind v. Union of India, (1995) 1 SCC 428*.

16. So as to satisfy judicial conscience of this Tribunal for the purpose of coming to the conclusion that extension of declaration of SFJ as an unlawful association for a further period of five years with effect from 10th July, 2024 is not based on the "*ipse dixit* of the Union of India" and that there is 'sufficient cause' for declaring the association unlawful, the dates of hearing were fixed for examining the witnesses to

independently assess their credibility and relevancy with reference to the material/evidence placed on record by the Union of India.

17. In order to facilitate the appearance on behalf of the members/office bearers of the association (SFJ) and enable any person/member of public to participate in the proceedings, the Tribunal apart from scheduling the dates of hearing at Delhi, also conducted the proceedings and examined the witnesses at Union Territory of Chandigarh; Shimla (Himachal Pradesh); Guwahati (Assam); Udaipur (Rajasthan) and Dehradun (Uttarakhand). Notices of the dates of hearing fixed at aforesaid places, were also issued through Ministry of Home Affairs, Government of India in local dailies (in English/regional language) for information of general public.

18. Despite service of notice upon SFJ and wide publicity given to hearings scheduled for the purpose of facilitating participation of any member/office bearer of SFJ, neither the concerned association, nor any of its office bearers or members entered appearance to contest the proceedings. No reply was filed on behalf of the concerned association, as contemplated under Section 4(2) of the UA(P)A despite ample opportunity afforded to the concerned association/its office bearers to appear before this Tribunal and give their written version/adduce evidence, if any, to oppose the declaration *vide* notification dated 08th July, 2024.

IV. REFERENCE TO APPLICATIONS FILED DURING THE COURSE OF PROCEEDINGS

19. It may be noticed that during the course of proceedings, an application was filed on behalf of Shanker Lal Dusad, Pradeep Poonia and Ajeet Kumar Sharma, accused in FIR No.0001/2024, PS: ATS, Gomti Nagar under Section 121-A/419/420/467/468/471/120-B IPC submitting their 'No Objection' for declaring 'Sikhs for Justice (SFJ)' as an unlawful association. On 16th October, 2024, Ms. Sumitra Choudhary, Advocate representing aforesaid applicants requested that they may be discharged from present proceedings as no further action is required at their end. The order was accordingly recorded since the same was not objected to, by learned counsel for the Union of India.

20. Also, during the course of proceedings on 14th November, 2024 in hearing at Chandigarh, an application was filed by one Vijay Singh Bhardwaj, who claimed to be aggrieved by the acts of Sikhs for Justice.

The copy of the application was supplied to learned ASG, who submitted that since the applicant supported the stand of Union of India, no further action was required on the application, since evidence in accordance with law is being led on behalf of Union of India. The applicant was discharged since he was not aggrieved against declaring of 'Sikhs for Justice (SFJ)' to be an unlawful association.

V. 18 FIRS REGISTERED AFTER 2020 BUT NOT REFERRED IN BACKGROUND NOTE FURTHER RELIED BY THE UNION OF INDIA

21. It is pertinent to observe that apart from 104 FIRs mentioned in the Background Note, Union of India has also relied upon 18 additional FIRs which do not form part of the cases/FIRs referred in Annexure-II to

the Background Note. The aforesaid FIRs have been relied by Union of India to corroborate the fact that the activities of SFJ have continued despite being declared as an Unlawful Association *vide* notification dated 10th July, 2019. The details of additional FIRs reflecting brief gist of case along with status as brought on record is tabulated as under:-

Sl. No.	Case particulars	Incidents involved	Arrests made	Latest status of cases
1.	FIR No. 314 dated 22.07.2024 under sections 192, 196 & 351 BNS and Sections 10, 13 & 18 of UA(P)A, 1967 PS: Special Cell, Delhi Police.	This case pertains to a threatening prerecorded voice notes received by two Members of Parliament (Rajya Sabha), Sh. A. A. Rahim and Dr. Sh. V. Shivdasan, on their mobile phones	(00)	The investigation is ongoing. A letter has been sent to Interpol to identify the user of the international number +447418603423. The audio recording has been sent to FSL Rohini for forensic analysis to match the voice with the suspected individual, Gurpatwant Singh Pannun.
2.	FIR No. 315 dated 22.07.2024 under Sections 192, 196 & 351 BNS and Sections 10, 13 & 18 of UA(P)A, 1967 PS: Special Cell, Delhi Police.	This case pertains to a threatening prerecorded voice note received at the landline of the Hon'ble Defence Minister's residence. The message, attributed to Gurpatwant Singh Pannun, founder of "Sikhs for Justice," threatened to bomb the Indian Parliament and Red Fort area to promote the Khalistan Referendum and	(00)	The investigation is ongoing, and efforts are being made to identify the user of the international number +447418603423 with assistance from Interpol, and further evidence is being collected.

		warned MPs to stay home if they opposed it. The call, originating from an international number +447418603423, was heard by Havildar Anoop P. Soman on duty.		
3.	FIR No. 119 dated 14.05.2022 registered under Section 505 IPC & Section 3 of Prevention of Defacement of Property Act, 1985 at Police Station City Budhlada, District Mansa, Punjab.	This case pertains to the discovery of objectionable handwritten posters promoting Khalistani sentiments and anti-India secessionist propaganda. These posters, bearing slogans like "Freedom 2020 Vote India Out of Khalistan, US Media International etc.", were found pasted on government property on a railway flyover at Boha Road in Budhlada, District Mansa.	(00)	An Untrace Report under Section 173 Cr.P.C. was prepared by the SHO of Police Station City Budhlada on 28.12.2022 and subsequently submitted to the court on 09.09.2023.
4.	FIR No. 23 of 2023, dated 07.03.2023 under Sections 124-A, 153-A, 504, 120-B of the Indian Penal Code (IPC) and Section 66F of the Information Technology Act, at Police Station Verka, District Commissionerate Amritsar, Punjab.	This case pertains to a viral video circulated by Gurpatwant Singh Pannun, General Counsel for Sikhs for Justice (SFJ). In the video, Pannun made provocative statements, claiming Punjab is not part of India, announcing plans to disrupt train services on March 15 and 16, and alleging the hoisting of a Khalistan flag at Verka Bypass in Amritsar during the G-20 summit.	(00)	The case is under investigation. The accused Gurpatwant Singh Pannun is still at large.

		Pannun also criticized the Punjab government for neglecting farmers and directed threats towards Amit Shah and Bhagwant Mann, stating that deaths occurring in their homes would soon impact others. He further warned that train stations in Amritsar, Ludhiana, Bathinda, and Firozpur would be shut down during the G-20 summit and that SFJ supporters would confront G-20 delegates.		
5.	FIR No. 317 dated 12.07.2023 under Section 3 of Punjab Prevention of Defacement of Property Act, PS City-2 Barnala Punjab. During investigation, offence u/s 153 IPC was added on 20.03.2024.	This case pertains to an incident of defacement of public property in Barnala, Punjab. According to ASI Tek Chand, based on secret information, it was discovered that signboards outside the office of the Forest Range Officer on Handiaya Road and opposite the rest house (marking the residence of the Deputy Commissioner) had been vandalized with the letters "SFJ" written in black paint. During investigation, it was discovered that signboards outside the Forest Range Officer's office on Handiaya Road and near the Deputy Commissioner's residence	(01) Kulvir Singh R/o Tapa has been arrested in this case.	The matter is now fixed for framing of charge on 07.01.2025.

		had been defaced with the words “Khalistan and SFJ” written in black paint. Additionally, another signboard displayed the message “SAHID NIJAR DA BADLA MODI SHAH THOKO WORLD CUP ROKO SFJ”, and a similar signboard was found on the wall of the Judicial Complex in Barnala.		
6.	FIR No.107 dated 01.05.2022 registered under Sections 153A & 153B of IPC and Section 3 of Punjab Prevention of Defacement Property Ordinance Act, 1997 at Police Station City-I, Malerkotla, Punjab.	This case pertains to an incident in Malerkotla where a saffron-colored flag and banner with the words "Punjab Hal Khalistan, Khalistan Zindabad" written in Punjabi were found hoisted on the wall of Nirankari Bhawan and the side gate of the DC Office.	(01) Accused Happy S/O Ram Krishan, resident of Near Shivaji Mandir, Giani Jail Singh Colony, Amargarh has been arrested in the case.	The case is pending trial before the Court of SDJM, Malerkotla.
7.	FIR No.73 dated 06.12.2023 registered under Section 153-B of IPC at PS GRP Bathinda, Punjab.	This case pertains to the registration of the FIR following an application by Sandeep Pathak, Advocate, Hindu Maha Gathbandan, Bathinda, requesting action against individuals responsible for placing posters and banners related to the Khalistan Association at the Bathinda-Mansa Road underbridge.	(02) Two accused were arrested i.e. Lovepreet Singh S/o Jagsir Singh resident Kot Shameer District Bathinda and Harmanpreet Singh S/o Kaku Singh resident of Kaile Bandar (Nasibpura) Police Station Talwandi Sabo District Bathinda.	The investigation into the matter is ongoing.

8.	FIR no. 45 dated 05.08.2021 under Sections 124A and 153A IPC & Sections 10 (a) and 13 UAP Act, registered at PS Cyber Crime Gurugram, Haryana.	The case pertains to circulation of a pre-recorded audio-video message which states that the people of Haryana and the elected government are acting against the interest of the people of Punjab. The individual delivering this message identified himself as Gurpatwant Singh Pannun.	(00)	Despite investigation the whereabouts of the accused could not be ascertained. Untrace report dated 16.12.2023 was filed with a direction that in case any clue is found in future, the investigation will continue.
9.	FIR no. 28 dated 15.04.2022 under Sections 124A and 153A IPC & Sections 10 (a) and 13 UAP Act, 1967 registered at PS Cyber Crime, Gurugram, Haryana	The case pertains to an audio-video message circulating on YouTube showing Gurpatwant Singh Pannun re-asserting Punjab's claim on Haryana. In a video statement Gurpatwant Singh Pannun announced that SFJ will launch "Haryana Banyega Khalistan" campaign on 29 th April to recruit volunteers who will advocate for liberation of Haryana from Indian occupation through Khalistan Referendum. FIR also mentioned that SFJ has also released a map of the areas earmarked for cessation from India through Khalistan.	(00)	The accused could not be ascertained during investigation and as such, a untrace report dated 24.11.2023 was filed with a direction that in case any clue is found in future, the investigation will continue.

10.	FIR no. 45 dated 06.08.2022 under Section 66 Information Technology Act, Sections 124A and 153A IPC & Sections 10 (a) and 13 UAP Act registered at PS Cyber Crime, Gurugram, Haryana.	The case pertains to a pre-recorded audio-video message being circulated on Twitter (now "X") showing Gurpatwant Singh Pannun stating " <i>India has occupied Punjab. This is the last war of freedom for the people of Punjab. Punjab's last war of independence has started on 75 years of independence. On 15th August 2022 Khalistani flag should be hoisted at every house and the tri-color should be burnt. The questions before the people of Punjab are whether they are with Hindustan or with Sikh community. The last war for freedom has begun</i> ".	(00)	The accused could not be traced and as such, untrace report dated 24.11.2023 has been filed with a direction that in case any clue is found in future, the investigation will continue
11.	FIR No. 91 dated 02.10.2022 under Section 153-B IPC, PS-Thermal, Bathinda, Punjab.	This case involves an incident where anti-national and divisive slogans were discovered written in black ink on the wall of the Forest Department near Papiha Palace, Joganand Road, Bathinda. The slogans included phrases such as "Hindustan Murdabad," "Muslim Sikh Bhai Bhai," "SFJ," and "Khalistan-Pakistan Jindabad."	(02) i) Rajwinder Singh s/o Jarnail Singh s/o Jodh Singh r/o Godara, Distt. Faridkot. ii) Pritpal Singh s/o Gurlal Singh s/o Harbans Singh r/o Village- Doda, Distt. Faridkot were arrested.	The proceedings are pending before the concerned Court and the last date of hearing was fixed for 07.11.2024.
12.	FIR No. 13 dated 27.02.2023 registered under Section 153-A IPC & Section 3 of	This case involves anti-national slogans written in black ink on the outer wall of the Polytechnic College	(00)	The Untrace Report has been accepted by the Court of Sh. Vijay

	Punjab Prevention of Defacement of Property Act, Police Station Smalsar, District Moga, Punjab.	Rode. The slogans included "Khalistan Zindabad" and "G-20 Foreign Minister, Punjab is not a India".		Kumar vide order dated 20.07.2024.
13.	FIR No. 398 dated 28.07.2022 under Sections 153A and 120B IPC & Section 13 of Unlawful Activities (Prevention) Act, 1967 registered at Police Station-Baldev Nagar, Ambala, Haryana.	This case involves the discovery of a banner promoting Khalistan at M.T. Crossing, Air Force Station Road, Ambala. The banner, included the text "HARYANA BANEKA KHALISTAN-REFERENDUM VOTING 26th JANUARY" along with a religious symbol.	(02) i) Accused Harvinder Singh @ Prince was arrested on 22.11.2022, and ii) Prem Singh @ Ekam was arrested on 31.01.2023	The matter is at the stage of prosecution evidence in the Sessions Court, Ambala.
14.	FIR No. 91 dated 02.07.2020 under Sections 153, 153A IPC, PS Sadar Abohar, Fazilka, Punjab	This case pertains to the discovery of anti-national and pro-Khalistani pamphlets pasted on a water tank near Khalinda Ram Dhani in District Fazilka, Punjab. The pamphlets contained slogans such as "Sikha De Sare Masle Khalistan Vich Hi Hal Honge" and "Khalistan", promoting secessionist ideology.	(04) i) Surinder Kumar son of Gopi Ram ii) Mandeep Singh @ Vakil Singh son of Mander Singh, iii) Iqbal Singh, were arrested, and iv) One Child in Conflict with Law was also apprehended.	The case is pending trial before the Court of JMIC, Abohar.
15.	FIR No. 43 dated 09.08.2022 under Section 2 of Prevention of Insult to National Honour Act, 1971	This case pertains to a video uploaded on social media in which Gurpatwant Singh Pannun issued threats against the Chief Minister and Home	(00)	Final Report/Untrace Report was filed before the concerned Court.

	registered at PS: GRP Sirsa, Haryana.	Minister of Haryana. He warned them against hoisting the tricolor on 15th August and offered Rs. 1.25 crore to unemployed individuals for joining his campaign. Additionally, he threatened to burn the tricolor in front of trains in Haryana from 13th August to 15th August. The video also depicted a tricolor burning on a railway track.		
16.	FIR No. 134 dated 26.03.2023 under Section 66F Information Technology (Amendment) Act 2008, Section 153A, 505IPC, Section 13, 15, 16, 20, 38, 39(2) of Unlawful Activities (Prevention) Act, 1967 registered at PS: Ramnagar, District-Nainital, Uttarakhand	This case involves threatening prerecorded audio messages related to the G-20 Conference, as proposed to be held from 28.03.2023 to 30.03.2023. On 26.03.2023, Inspector Arun Kumar Saini, SHO of PS Ramnagar, received two calls on his mobile, and another call was made to the police station number. The message, attributed to Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), was as follows: <i>“G-20 delegates, Ramnagar is not India, Ramnagar is Khalistan. Sikhs for Justice is raise flag of Khalistan during G-20 summit at Ramnagar, at airport, at railway station to show internationalize that Ramnagar will be part of Khalistan. Once we liberate</i>	(00)	The investigation is still in progress.

		<i>Punjab from Indian occupation through Khalistan freedom and if Chief Minister Dharami try to file the cases against Sikhs in Uttarakhand, you will be held accountable for each crime you are committing. Message is from Gurpatwant Singh 'Pannun' SFJ General Council."</i>		
17.	FIR No. 230 dated 04.10.2023 under Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 and Section 3 of Prevention of Damage to Public Property Act, 1984 registered at PS: Dharamshala, Himachal Pradesh.	This case pertains to an incident of defacement of public property. According to the complaint by Ashwani Kumar, while on duty near the office of the Executive Engineer, Jal Shakti Department, he observed a boy sitting near a wall with a signboard and writing something. At the time, the activity did not appear suspicious. Later, when Ashwani Kumar exited his office, he noticed "KHALISTAN ZINDABAD" written in English on the wall.	(00)	An Untrace Report dated 25.01.2024 filed before CJM, Kangra was accepted vide order dated 05.10.2024.
18.	FIR No. 55 dated 27.04.2024, under Section 153B of IPC PS- Civil Lines, Bathinda, Punjab.	This case, registered as FIR No. 55 dated 27.04.2024 at PS-Civil Lines, Bathinda, pertains to the discovery of pro-Khalistani slogans written in black ink on the	(06) i. Jeni Ram: Arrested on 08.05.2024.	The case is under investigation.

		<p>wall of the Mini Secretariat, opposite the Women's Police Station, and the court complex in Bathinda. The slogans, such as "Khalistan Jindabad", were reported by an informant to ASI Sukhdarshan Kumar and his team during a patrol.</p>	<p>ii. Gogi Singh: Arrested on 14.05.2024.</p> <p>iii. Pritpal Singh: Arrested after obtaining a production warrant.</p> <p>iv. Gurdas Singh @ Jassa Singh: Arrested on 15.05.2024.</p> <p>v. Randeep Singh @ Deep: Arrested on 15.05.2024 following Gurdas Singh's disclosure.</p> <p>vi. Gurpreet Singh @ Kaku: Arrested on 15.05.2024 along with Randeep Singh</p>	
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VI. EVIDENCE ADDUCED ON BEHALF OF UNION OF INDIA

22. In support of extension of declaration of SFJ as an unlawful association for a further period of five years with effect from 10th July, 2024, 52 witnesses were examined on behalf of Union of India. The details

of the witnesses along with brief reference to FIR(s) and the date and place of examination is tabulated as under:-

Sr. No.	PW No.	Name, Designation & FIRs in respect of which deposition was made	Date of Examination	Place of Examination
1	PW-1	<p>Shri Ved Prakash, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi Police, Delhi.</p> <p>Supervisory Officer of seven FIRs bearing FIR Nos.179/2020; 28/2021; 211/2021; 6/2022; 18/2023;106/2024 and 47/2024 registered in Delhi mentioned at Serial Nos.81, 82, 84, 85, 86, 91 & 92 of the background note.</p>	26.10.2024	Court Room No.20, Delhi High Court, New Delhi.
2	PW-2	<p>Shri Sanjay Dutt, Assistant Commissioner of Police, Special Cell, South Western Range, Janakpuri, Delhi Police, New Delhi.</p> <p>supervisory officer in respect of (i) FIR No. 28 dated 27.08.2023 u/s 153, 153A, 505 IPC, 03 Delhi Prevention of Defacement of Property Act at PS Nangloi Metro Station, New Delhi, (ii) FIR. No. 697 dated 28.08.2023 u/s 153, 153A, 505/34 IPC, 03 Delhi Prevention of Defacement of Property Act at PS Nangloi, New Delhi, (iii) FIR No. 705 dated 28.09.2023 u/s 153, 153A, 153/B 505 IPC, 120-B IPC and 03 Delhi Prevention of Defacement of Property Act at PS Kashmiri Gate, New Delhi, (iv) FIR No. 469 dated 18.12.2023 03</p>	26.10.2024	Court Room No.20, Delhi High Court, New Delhi.

		Delhi Prevention of Defacement of Property Act at PS Hari Nagar, New Delhi, (v) FIR No. 75 dated 26.01.2024 03 Delhi Prevention of Defacement of Property Act at PS Tilak Nagar New Delhi, (vi) FIR No. 314/24 dated 22.07.24, u/s 192/196/351BNS & 10/13/18 UA(P)A, PS Special Cell, New Delhi and (vii) FIR No. 315/24 dated 22.07.24, u/s 192/196/351 BNS & 10/13/18 UA(P)A, PS Special Cell, New Delhi. The FIRs at Serial No.(i) to (v) referred to above are mentioned at serial no.87,88,89,90,93 at ANNEXURE-II of the reference note/background note.		
3	PW-3	Shri Ashish Khari, Inspector of Police, CIB Division of National Investigation Agency (NIA), New Delhi. Chief Investigating Officer (CIO) of RC-12/2021/NIA/DLI mentioned at Serial No. 2 (cases registered by National Investigation Agency) of Annexure II to the Reference Note/Background Note.	26.10.2024	Court Room No.20, Delhi High Court, New Delhi.
4	PW-4	Shri Balwinder Singh Randhawa, Superintendent of Police, Investigation, District Gurdaspur, Punjab, India. supervisory officer of FIR bearing No. 42 dated 02.06.2022 registered u/s 153-B IPC Police Station Kalanaur, District Gurdaspur mentioned at Serial No. 29 of Annexure II to the Reference Note/Background Note.	28.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.

5	PW-5	Shri Manmohan Singh Aulakh, Superintendent of Police, Investigation, District Mansa, Punjab, India. supervisory officer of FIR bearing No. 119 dated 14-05-2022 registered u/s 505 IPC & s. 3 of Prevention of Defacement of Property Act, 1985 at Police Station City Budhlada, District Mansa. This FIR is a new case and not mentioned in Annexure II to the Reference Note/Background Note.	28.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
6	PW-6	Shri Ramanpreet Singh Gill, Deputy Superintendent of Police, Detective, District Sri Muktsar Sahib, Punjab, India. Deputy Supervisory Officer of FIR bearing No.01 dated 03-01-2023 registered u/s 124-A, 153-A, 153-B, 34 IPC Police Station Sadar, Sri Muktsar Sahib, District Sri Muktsar Sahib, mentioned at Serial No.43 of Annexure II to the Reference Note/Background Note.	28.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
7	PW-7	Shri Suknwinder Singh, Deputy Superintendent of Police, City, Ferozpur, Punjab. Supervisory Officer of FIR NO.130 of 2022 registered at PS Sadar, Ferozpur mentioned at Serial No.33 of Annexure II to the Reference Note/Background Note.	28.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
8	PW-8	Shri Sarabjit Singh, Superintendent of Police (INVESTIGATION), Hoshiarpur, Punjab.	28.10.2024	Court Room No.33, Punjab & Haryana High

		Supervisory officer of FIR No. 93 dated 06.08.2016 PS Chabbewal, Hoshiarpur mentioned at Sr. No. 1 of Annexure II to the Reference/Background Note.		Court, Chandigarh.
9	PW-9	Shri Paramjit Singh, Inspector in Counter Intelligence, Bhatinda. Deputy Supervisory Officer of FIR No.233 of 2023 registered at PS: Canal Colony, Bathinda mentioned at Serial No.52 respectively of Annexure II to the Reference/Background Note.	28.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
10	PW-10	Shri Navjot Singh, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar.	28.10.2024 Partly examined	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
		Shri Navjot Singh, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar. Supervisory Officer of four FIRs bearing FIR Nos.168/2020 (mentioned at serial no.20 of background note), 04/2024 (mentioned at serial no.54 of background note), & 69/2022 (mentioned at serial no.31 of background note) and additional FIR N0.23/2023.	29.10.2024 examination concluded	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
11	PW-11	Shri Rajinder Pal Singh, Deputy Superintendent of Police, Investigation, District Barnala, Punjab. Supervisory Officer of FIR bearing No.317/2023 dated 12.07.2023 u/s 3 of	29.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.

		Punjab Prevention of Defacement of Property Act, PS City-2 Barnala Punjab		
12	PW-12	Shri Pawanjit, Additional Deputy Commissioner of Police, Ludhiana. Supervisory Officer of FIR No.154 of 2021 registered at P.S. Dehlon mentioned at Serial No.25 of the background note.	29.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
13	PW-13	Shri Vaibhav Sehgal, Superintendent of Police, Investigation, Malerkotla, Punjab, India. Supervisory Officer of the investigations in District Malerkotla, State of Punjab of FIR bearing No.107 dated 01.05.2022 registered u/s 153A, 153B of IPC and section 3 of Punjab Prevention of Defacement Property Ordinance Act, 1997 at Police Station City-I, Malerkotla, which was not mentioned in Annexure II to the Reference/Background Note.	29.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
14	PW-14	Shri Navneet Singh Mahal, Superintendent of Police (PBI), Rupnagar, Punjab. Supervisory Officer of FIR bearing No.52 Dated 13.04.2022 u/s 124-A, 153-A, 153-B, 120-B IPC and section 13, 16 and 18 UA(P) Act, mentioned at Serial no. 27 of the background note.	29.10.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
15	PW-15	Shri Migom Doley, Superintendent of Police, CIB Division National Investigation Agency, New Delhi.	07.11.2024	Court Room No.20, Delhi High Court, New Delhi.

		Chief Investigating Officer of RC bearing no RC-30/2023/NIA/DLI dated 17.11.2023 registered by the National Investigation Agency. under Sections 120B, 153A & 506 of IPC & sections 10, 13, 16, 17, 18, 18 B & 20 of UA (P) Act, 1967, which is mentioned at Serial No.8 (cases registered by National Investigation Agency) of Annexure II to the Reference Note/Background Note.		
16	PW-16	Shri Nidhin Lal, Superintendent of Police, National Investigation Agency, New Delhi. Chief Investigating Officer of RC bearing no RC-40/2020/NIA/DLI registered by the National Investigation Agency under Sections 120B, 124A, 153A and 153B of the Indian Penal Code and Sections 13, 17, 18, 18B and 20 of the Unlawful Activities (Prevention) Act, 1967, which is mentioned at Serial No.4 (cases registered by National Investigation Agency) of Annexure II to the Reference Note/Background Note.	07.11.2024	Court Room No.20, Delhi High Court, New Delhi.
17	PW-17	Shri Raghvendra Vashistha, Inspector of Police, I&O Division, National Investigation Agency, New Delhi. Chief Investigating Officer of RC bearing no RC-02/2019/NIA/DLI under Sections 120B, 124A, 153A, 153B and 505 of the Indian Penal Code and Sections 13, 17 and 18 of Unlawful Activities (Prevention) Act, 1967, which is mentioned at Serial No.1 of	07.11.2024	Court Room No.20, Delhi High Court, New Delhi.

		cases registered by National Investigation Agency in Annexure II to the Reference/Background Note.		
18	PW-18	Ms. Preetinder Kaur Virk, Deputy Superintendent of Police in the National Investigation Agency, Branch Office, Chandigarh. Chief Investigating Officer of RC-19/2020/NIA/DLI dated 05.04.2020, registered at National Investigation Agency, Branch Office, Chandigarh mentioned at Serial No. 2 of the background note.	13.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
19	PW-19	Shri Simranjit Singh Lang (P.P.S.), Deputy Superintendent of Police, State Cyber Division, Punjab. Supervisory Officer of FIR No.12/2020, 34/2021, 24/2022 and 27/2022 mentioned at Serial No.17, 23, 28 and 30 of the background note. The Police Station concerned in respect of FIR No.12/2020 at serial No. 17 in the background note has been erroneously reflected as PS: SSOC Mohali (i.e. State Special Operation Cell) in place of PS: Punjab State Cyber Crime.	13.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
20	PW-20	Shri Sourabh Bhardwaj, Deputy Superintendent of Police, NIA, Delhi. Chief Investigating Officer of RCs bearing No RC-30/2020/NIA/DLI; RC-35/2021/NIA/DLI and RC-22/2022/NIA/DLI mentioned at Serial No. 3, 6 and 7 (cases registered by	13.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.

		National Investigation Agency) respectively of Annexure II to the Reference/Background Note.		
21	PW-21	Smt. Anita Saini, Deputy Superintendent of Police/Admin/GRP/Punjab. Deputy Supervisory Officer of the FIR bearing No.62 dated 05.09.2023 registered under section 153-B of IPC at PS GRP, Bathinda (mentioned at Serial No 49 of the background/reference note), FIR No.73 dated 06.12.2023 registered under section 153-B of IPC at PS GRP Bathinda (this is new FIR not mentioned in reference note), FIR No. 65, dated 11-08-2022 registered under section 2 of Prevention of Insult To National Honours Act, 1971, 120-B of IPC at PS GRP Amritsar (mentioned at Serial No 41) and FIR No. 119, dated 29-11-2023, registered under section 153-B of IPC at PS GRP Amritsar (mentioned at Serial No. 50) of Annexure II to the Reference/Background Note.	13.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
22	PW-22	Shri Kuldip Singh, Sub-Inspector In-charge, Police Post, Sector-43, Chandigarh. Supervisory Officer of the FIR bearing no.51 of 2023 dated 26.01.2023 registered under section 3(1) of Delhi Prevention of Defacement of Public Property Act, 2007 at PS- Sector 36, UT, Chandigarh mentioned at Serial No	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.

		95 in Annexure II to the Reference/Background Note.		
23	PW-23	Shri Adarshdeep Singh, Deputy Superintendent of Police, Sirsa, Haryana. Supervisory Officer of FIR bearing No.148/2023 u/s 120-B, 124-A IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967 registered at PS: Sirsa Sadar, mentioned at Serial no. 66 of the reference note.	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
24	PW-24	Shri Rajesh Kumar Mohan, Assistant Superintendent of Police, Hisar, Haryana. Supervisory Officer of FIR bearing No.31/2022 u/s 120-B and 124A, 336, 379 IPC; Section 3 of Public Property (Prevention of Damage) Act, 1984; 66F of Information Technology Act; Section 150 of Railways Act, 1989 and Section 10, 13 of Unlawful Activities (Prevention) Act, 1967 dated 16.07.2022 registered at PS: Cyber Crime, Police Station, Hisar. The same is mentioned at Serial No. 62 of the Reference Note.	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
25	PW-25	Smt. Deepti Garg, Superintendent of Police, Dabwali (presently posted as Commandant of 4 th Battalion, IRB, Manesar, Gurugram). Supervisory Officer of the FIR bearing No.627/2022 u/s 120-B, 124-A IPC and Section 13 of UAP Act and FIR bearing No.473/2023 u/s 120-B, 124-A IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967 both registered	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.

		at PS: City Mandi Dabwali, Dabwali. These are mentioned at serial no(s). 63 and 67 to the Reference Note.		
26	PW-26	Shri Siddhant Jain, Deputy Commissioner of Police, Gurugram, Haryana (now Superintendent of Police, Dabwali). Supervisory Officer in FIRs bearing No. 137 of 2020 and 52 of 2021, mentioned at Serial No 56 and 59 respectively in the Reference Note. He is also the Supervisory Officer in FIRs bearing No. 45 of 2021, No. 28 of 2022 and No. 45 of 2022. The latter set of FIRs do not find mention in the Reference Note.	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
27	PW-27	Shri Mohit Handa, Deputy Commissioner of Police, Crime, Gurugram (earlier posted as Superintendent of Police, Karnal, Haryana). Supervisory Officer of FIR No.972 dated 23.12.2020 u/s 120B IPC & Section 13 Unlawful Activities (Prevention) Act, 1967 registered at P.S. Karnal Sadar and FIR No.414 dated 20.06.2020 u/s 120B, 153A IPC & Section 13 Unlawful Activities (Prevention) Act, 1967 registered at P.S. Civil Lines, Distt. Karnal. These are mentioned at Serial No. 58 and 61 of the background note.	14.11.2024	Court Room No.33, Punjab & Haryana High Court, Chandigarh.
28	PW-28	Shri Rajpal, Assistant Commissioner of Police, Crime, Sonipat, Haryana.	14.11.2024	Court Room No.33, Punjab & Haryana High

		Supervisory Officer of FIR No.293 u/s 124A, 153B and 120B IPC dated 26.06.2020 registered at PS: Sadar Sonipat. The same is not mentioned in the Reference Note.		Court, Chandigarh.
29	PW-29	Dr. Vasudha Sood, Sub Divisional Police Officer, Amb Tehsil, District Una, Himachal Pradesh.	16.11.2024	High Court of Shimla, Himachal Pradesh
		Supervisory Officer in respect of FIR No.63/2023 and later Investigating Officer of FIR No.63/2023 dated 29.11.2023. The said FIR was registered at PS Chintpurni Tehsil Amb District Una, Himachal Pradesh u/s 153A IPC, Section 3 of HP Open Place (Prevention of Disfigurement) Act, 1985. Section 13 of Unlawful Activities (Prevention) Act, 1967 was subsequently invoked vide Case Diary No.21-A. The same is reflected at Serial No.77 of Annexure II in the Reference Note.	06.12.2024	Room No.5, State Information Commission Bhawan, Dehradun
30	PW-30	Dr. Amar Singh, Inspector, officiating SHO, PS: Cyber Crime, CID, Shimla. (Partly examined)	16.11.2024	High Court of Shimla, Himachal Pradesh
		Supervisory Officer of FIR No.04/2021 dated 31.07.2021 u/s 124, 153A, 120B, 506 of IPC; Section 13 of Unlawful Activities (Prevention) Act, 1967 and Section 66-C of Information Technology (Amendment) Act, 2008 registered at PS: Cyber Crime, CID, Shimla mentioned at Serial No.72 of Annexure II to the Reference Note/Background Note.	06.12.2024	Room No.5, State Information Commission Bhawan, Dehradun

31	PW-31	<p>Mr.Pranab Kumar Pegu, Additional Superintendent of Police, STF Assam, Guwahati.</p> <p>Investigating Officer of FIR No.02/2023 dated 02.04.2023 u/s 121, 124A, 506 IPC and u/s 10, 13, 16, 18 of the Unlawful Activities (Prevention) Act, 1967 registered at Police Station Special Task Force (STF), Assam, District- Kamrup (M), Assam and FIR No.03/2023 dated 25.04.2023 u/s 120B, 121, 124-A, 506 IPC and u/s 10, 13, 16, 18, 20 of the Unlawful Activities (Prevention) Act, 1967 registered at Police Station Special Task Force (STF), Assam, District- Kamrup (M), Assam. The same are mentioned at Serial No.79 & 80 of Annexure II in the Reference Note.</p>	20.11.2024	Court Room No.1, Old Block, The Gauhati High Court, Guwahati.
32	PW-32	<p>Shri Narinder Singh, Superintendent of Police, City, Bathinda (State of Punjab). Supervisory Officer of 03 FIRs bearing FIR Nos.91/2022, 55/2024 and 89/2022 registered in Punjab. The FIR No. 91/2022 and 55/2024 are newly added and have not been reflected in the Background Note.</p> <p>FIR No. 89/2022 is mentioned at Serial no. 39 of the Background Note.</p>	27.11.2024	Court Room No.20, Delhi High Court, New Delhi.
33	PW-33	<p>Shri Gurpartap Singh Sahota, PPS, presently working as Superintendent of Police, Investigation Batala, District Gurdaspur, Punjab.</p>	27.11.2024	Court Room No.20, Delhi High Court, New Delhi.

		Supervisory Officer of FIR No. 46 of 2018 registered at Police Station: Rangar Nangal; FIR No.77 of 2022 P.S.: Dera Baba Nanak, Police District: Batala and FIR No.10 of 2024 P.S.: City Batala, Police District: Batala mentioned at Serial No. 04, 38 & 55 of the Background Note.		
34	PW-34	Shri Jasmeet Singh Sahiwal, PPS, Superintendent of Police, (PBI & Inv.) Faridkot. Supervisory Officer of FIR bearing FIR No.201, dated 11.06.2022 registered u/s 153-A/153-B/120-B IPC, Section 3 Prevention of Defacement of Property Act 1985, Police Station City Faridkot, Punjab mentioned at Serial No.32 of the Background Note.	27.11.2024	Court Room No.20, Delhi High Court, New Delhi.
35	PW-35	Shri Lavdeep Singh Gill, PPS, Deputy Superintendent of Police, Detection, District Moga, Punjab. Supervisory Officer of FIR bearing No.13 dated 27.02.2023 registered u/s 153-A IPC & Section 3 of Punjab Prevention of Defacement of Property Act, Police Station Smalsar, District Moga as well as FIR No.124/2023 dated 02.06.2023 mentioned at Serial No. 48 of the Background note. FIR No.13/2023 has not been mentioned in Annexure II to the Reference Note/Background Note	27.11.2024	Court Room No.20, Delhi High Court, New Delhi.
36	PW-36	Shri Jasbir Singh, Superintendent of Police, Special Branch, District Patiala.	28.11.2024	Court Room No.20, Delhi

		Supervisory Officer of investigations in FIRs bearing No.148/2022, 144/2021, 179/2018 and 132/2018 mentioned at Serial 40, 26, 07 and 08 respectively of the Background Note.		High Court, New Delhi.
37	PW-37	Shri Surinder Singh Bhoria, Superintendent of Police, Ambala, Haryana. Supervisory Officer of FIR No.71 of 2023 under Section 153A IPC, which is mentioned at Serial No.64 of the Reference Note. He is the Supervisory Officer of FIR No.398 of 2022 under Sections 153A and 120B IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967 which does not find mention in the reference but is relied upon as additional evidence.	28.11.2024	Court Room No.20, Delhi High Court, New Delhi.
38	PW-38	Shri Manmohan Singh, Assistant Commissioner of Police Headquarters, Commissionerate Jalandhar. Supervisory Officer of FIR No.76 of 2022, PS: Division 3, Commissionerate, Jalandhar; FIR No.66 of 2022, PS: Cantt., Commissionerate, Jalandhar and FIR No.102 of 2022, PS: Navi Baradari mentioned at Serial Nos.34, 37 & 42 of the Background Note.	28.11.2024	Court Room No.20, Delhi High Court, New Delhi.
39	PW-39	Shri Tejinder Pal Singh Brar, PPS, Deputy Superintendent of Police, Sub Division, Abohar, Fazilka, Punjab.	28.11.2024	Court Room No.20, Delhi High Court, New Delhi.

		Supervisory Officer in respect of FIR No.91 dated 02.07.2020 under Section 153, 153A IPC, PS Sadar Abohar, Fazilka, Punjab. The said FIR is not mentioned in ANNEXURE-II of the reference/background note.		
40	PW-40	Shri Harwinder Pal Singh, DSP/SSOC/Amritsar. Supervisory Officer of FIR No.03 of 2019 registered at SSOC/Amritsar, FIR No.06 of 2020 registered at SSOC/SAS Nagar, FIR No.07 of 2021 registered at SSOC/SAS Nagar & FIR No.02 of 2024 registered at SSOC/SAS Nagar mentioned at Serial Nos. 09, 15, 24 & 53 respectively of Annexure II to the reference/background note.	28.11.2024	Court Room No.20, Delhi High Court, New Delhi.
41	PW-41	Shri Babulal Meena, Additional Superintendent of Police GRP circle Bikaner, District GRP Jodhpur (Rajasthan). Supervisory Officer of FIR No.56/2023 registered at Police Station-GRP Hanumangarh, District-GRP (N) Jodhpur (Rajasthan) mentioned at Serial No 94 of Annexure II of the Reference/Background Note.	02.12.2024	Board Meeting Hall, Municipal Corporation, Udaipur, Rajasthan.
42	PW-42	Shri Jitendra M. Yadav, Deputy Superintendent of Police, Sabarmati Central Jail, Ahmedabad, Gujarat. Supervisory Officer of FIRs bearing No.11191067230030/23 dated 11.03.2023, PS: Cyber Crime, Ahmedabad City and	02.12.2024	Board Meeting Hall, Municipal Corporation, Udaipur, Rajasthan.

		11191067230127/23 dated 28.09.2023, PS: Cyber Crime, Ahmedabad City, mentioned at Serial No.69 and 70 of Annexure II of the Reference/Background Note.		
43	PW-43	Shri Sumit Kumar, Superintendent of Police, GRP, Ambala Cantt., Haryana. Supervisory Officer of FIR No.48 dated 05.09.2023 u/s 120B, 124A, 153B IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967, PS: GRP, Kurukshetra, which is mentioned at Sr. No.68of the Reference Note. He is also the Supervisory Officer of FIR No.43 dated 09.08.2022 u/s 2 of Prevention of Insult to National Honour Act, 1971, PS: GRP Sirsa which is not mentioned in the Reference Note but is relied upon as additional evidence	03.12.2024	Board Meeting Hall, Municipal Corporation, Udaipur, Rajasthan.
44	PW-44	Shri Manoj Kumar Katyal, Add. SP, Narendra Nagar, Uttarakhand. Supervisory Officer of FIR No.299/2018 under Section 153B, 505 IPC and Section 66 of the Information Technology (Amendment) Act, 2008 registered at PS: Khatima, District: Udham Singh Nagar, which is mentioned at Serial No.71 of Annexure II to the Reference/Background Note. He is also the Supervisory Officer of FIR No.134/2023 under Section 66F Information Technology (Amendment) Act 2008, Section 153A, 505IPC, Section 13, 15, 16, 20, 38, 39(2) of Unlawful Activities (Prevention) Act,	05.12.2024	Room No. 5, State Information Commission Bhawan, Dehradun

		1967 registered at PS: Ramnagar, District-Nainital, Uttarakhand which is adduced as additional evidence.		
45	PW-45	Shri Sandeep Pathania, SHO, PS Dehra, District Kangra, Himachal Pradesh. Supervisory Officer of FIR No.207/2023 registered at PS Dehra, District Kangra, Himachal Pradesh under Section 153 IPC and Section 3 of Prevention of Damage to Public Property Act, 1984 {to be correctly read as Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985}, which is mentioned at Serial No.76 of Annexure II to the Reference/Background Note .	05.12.2024	Room No. 5, State Information Commission Bhawan, Dehradun
46	PW-46	Shri Narayan Singh, SHO, PS Dharmshala, District Kangra, Himachal Pradesh. Investigating Officer (inadvertently referred as Supervisory Officer in the affidavit) of FIR No.77/2022 registered at PS: Dharamshala under Section 153A, 153B IPC and Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985. Later on, Section 3 of Prevention of Damage to Public Property Act, 1984 and Section 13 of Unlawful Activities (Prevention) Act, 1967 was also invoked. He is also the Supervisory Officer of FIR No.230/2023 registered at PS: Dharamshala under Section 3 of Himachal Pradesh Open Places	05.12.2024	Room No. 5, State Information Commission Bhawan, Dehradun

		(Prevention of Disfigurement) Act, 1985 and Section 3 of Prevention of Damage to Public Property Act, 1984. These cases are mentioned at Serial No. 73 and 75 of the Background Note.		
47	PW-47	Shri Ram Swroop Thakur, SHO, PS Boileauganj, District Shimla, Himachal Pradesh. Supervisory Officer of FIR No.221/2022 registered at PS: Shimla West, Himachal Pradesh under Section 153A and 153B IPC, which is mentioned at Serial No.74 of Annexure II to the Reference/Background Note.	05.12.2024	Room No. 5, State Information Commission Bhawan, Dehradun
48	PW-48	Shri Pramod Kumar Mishra, DSP, Hatia, Ranchi, Jharkahnd. Investigating Officer of FIR No.69/2024 dated 19.02.2024 u/s 10 & 13 Unlawful Activities (Prevention) Act, 1967 and Section 66(F), Information Technology (Amendment) Act, 2008 registered at PS: Dhurva, Ranchi, which is mentioned at Sr. No.96 of the Background/Reference Note.	05.12.2024	Room No. 5, State Information Commission Bhawan, Dehradun
49	PW-49	Shri Talwinder Singh Gill, DSP, SAS Nagar, Punjab. Supervisory Officer of FIR No.149 of 2017 dated 06.07.2017 registered at PS: Sohana under Section 124A, 153A, 153B, 120B IPC; FIR No.07 of 2020 dated 01.02.2020 under Section 384, 387, 506, 294, 385 IPC registered at PS: Phase XI, SAS Nagar and FIR No.43 of	09.12.2024	Court Room No.20, Delhi High Court, New Delhi.

		2020 dated 19.06.2020 registered at PS: Sadar Kurali under Section 124A, 131, 153A IPC and Section 10, 13 of Unlawful Activities (Prevention) Act, 1967 mentioned at Serial No.02,13 and 19 respectively of Annexure-II to the Reference/Background Note.		
50	PW-50	Shri Palwinder Singh Cheema, SP, Sangrur, Punjab. Supervisory Officer of FIR No.116 dated 20.06.2022 u/s 153-A, 153-B, 120-B IPC, Section 13, 18 Unlawful Activities (Prevention) Act, 1967 and Section 3 of the Punjab Prevention of Defacement of Property Act, 1997 registered at P.S.: City Sangrur and FIR No.118 dated 27.06.2022 u/s 153-A/153-B/427/120-B IPC and Section 3 of the Punjab Prevention of Defacement of Property Act, 1997 registered at PS: City Sangrur mentioned at serial No.35 and 36 respectively of the Background Note.	09.12.2024	Court Room No.20, Delhi High Court, New Delhi.
51	PW-51	Shri Varun Singla, SP, Kurukshetra, Haryana. Supervisory Officer of FIR bearing No.597 of 2020 dated 12.07.2020 under Section 124-A, 153-A IPC and Section 10(a)/13 Unlawful Activities (Prevention) Act, 1967 registered at PS: Thanesar City, District Kurukshetra; FIR No.229 of 2022 dated 29.04.2022 under Section 124-A, 153-B, 120-B IPC and Section 13 Unlawful Activities (Prevention) Act, 1967 registered at PS:	10.12.2024	Court Room No.20, Delhi High Court, New Delhi.

		Thanesar City, Kurukshetra and FIR No.81 of 2023 dated 05.04.2023 under Section 153-B, 120-B IPC and Section 13 Unlawful Activities (Prevention) Act, 1967 registered PS: Ismailabad, mentioned at Serial No.57, 60, 65 respectively of Background Note.		
52	PW-52	Shri Anil Subramaniam, Joint Secretary, Ministry of Home Affairs, North Block, New Delhi	13.12.2024	Court Room No.20, Delhi High Court, New Delhi.

23. PW-1

i. **PW-1 Ved Prakash**, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi tendered his affidavit **Exhibit PW-1/A** after due authorization from the Competent Authority. He deposed that he is the Supervisory Officer of seven FIRs bearing FIR Nos. 179/2020, 28/2021, 211/2021, 6/2022, 18/2023, 106/2024 and 47/2024 registered in Delhi, which are mentioned at Serial Nos. 81, 82, 84, 85, 86, 91 and 92 of the background note. The contents of the affidavit were stated to be based on record revealed during investigation as well as in his personal knowledge acquired over his 30 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No.179/2020, PS: Special Cell, Delhi.

ii. In regard to **FIR No. 179 dated 17.07.2020**, registered at Police Station Special Cell, Delhi, under Sections 10(a)/13(1) of the UA(P) Act and 124-A of the IPC, witness PW-1 testified that the complaint was filed by Sh. Puneet Singh Chandhok. The complaint alleged that the organization Sikhs for Justice (SFJ) was inciting insurgency and communal disturbances in India by promoting Pro-Khalistan ideology and the Referendum-2020 Agenda on social media platforms. The complaint further alleged that various anti-national and militant organizations, including SFJ, in coordination with Pakistan and its agencies, were actively attempting to instigate violence and radicalize youth in India. These organizations were accused of running Pro-Khalistan and Referendum-2020 campaigns on platforms such as Facebook, Twitter, VOIP and YouTube, propagating anti-India sentiments and spreading extremism. The complaint also included a list of Facebook and Twitter accounts allegedly involved in these activities. The copy of FIR No. 179/2020 is **Exhibit PW-1/A1.**

iii. He deposed that the complaint also alleged SFJ's use of automated calls featuring the recorded voice of their convener, Gurpatwant Singh Pannun, advocating for the creation of Khalistan through the secession of Indian Territory. These calls reportedly included instructions to hoist the Khalistan flag at the Red Fort and to remove the Indian national flag. During the investigation, it was revealed that the recorded voice in

these calls indeed belonged to Gurpatwant Singh Pannun. Several inputs and complaints were received about threatening and anti-national calls originating from various ILD numbers. One such call was traced to ILD number +12053775301 and its recording was obtained. The contents of this call were deemed a serious threat to the unity, integrity and security of India.

iv. He further stated that the recording of the call, along with a video clip of an interview with Gurpatwant Singh Pannun obtained from News18, was submitted to the CFSL, Delhi, for examination. The CFSL's report, dated January 6, 2023, confirmed that the voice in the questioned call matched Pannun's voice sample. **Exhibit-PW1/A2** is the copy of the pre-recorded message in a Pen Drive received from phone number: +12053775301; **Exhibit-PW1/A3** is a copy of the Seizure Memo dated 09.09.2022; **Exhibit-PW1/A4** is the copy of CFSL result; **Exhibit-PW1/A5** are the copies of statements of seven witnesses under Section 161 recorded during investigation along with their translated copies.

v. PW-1 further testified that a Mutual Legal Assistance request was sent to the United States seeking information from US-based social media platforms. However, US authorities declined to provide the requested information. A copy of the letter requesting mutual legal assistance and the US response is **Exhibit-PW1/A6**. Further legal proceedings are ongoing.

FIR No.28/2021, PS Special Cell, Delhi

vi. In regard to **FIR No. 28/2021**, dated 14.01.2021, registered at Police Station Special Cell, Delhi, under Sections **13, 17, 18, 18(B), 20 and 39 of the Unlawful Activities (Prevention) Act (UA(P) Act)** and Sections **124(A), 153 and 120(B) of the IPC**, PW-1 testified that the FIR was based on confidential intelligence regarding activities of the banned organization **Sikhs For Justice (SFJ)**. The intelligence revealed that the website www.punjabreferendumcommission.org, operated by SFJ, had announced an offer of **USD 250,000** for anyone who could hoist the Khalistan flag at **India Gate on Republic Day, January 26, 2021**. The offer was confirmed through a letter issued by SFJ, which stated: *"SFJ offers USD 250K for raising Khalistan flag at India Gate on R-Day. January 11, 2021, New York."*

vii. The witness deposed that as India approached its **72nd Republic Day**, SFJ targeted **Punjab farmers protesting at the Singhu Border**, urging them to participate in the flag-raising act on January 26 in exchange for the promised reward. SFJ not only offered substantial financial incentives but also assured **full logistical support**. The organization encouraged farmers to conduct a **"Kesri" tractor rally** in parallel to the official Republic Day parade as a symbol of their protest against the government's agricultural reforms. Additionally, SFJ promised **legal help** and support for **resettlement in the United Kingdom** for participants involved in the flag-hoisting event. Simultaneously, SFJ was organizing a **non-governmental referendum** on Punjab's secession from India, scheduled to commence on **August 15, 2021**, from **London, UK**. The organization's convener, **Gurpatwant Singh Pannun**, used both spoken and written statements to incite **disdain and disaffection** towards the Government of India. He publicly declared the **USD 250,000 bounty** for raising the Khalistan flag at India Gate on Republic Day. A Copy of FIR No. 0028/2021 dated 14.01.2021 PS Special Cell is **Exhibit-PW1/B1**. A copy of SFJ's letter is **Exhibit-PW1/B2**. The witness deposed that notices were served to social media platforms seeking details of registered user. A copy of the notices served to various

social media platforms is **Exhibit-PW1/B3**. A copy of the letter for mutual legal assistance seeking information from US based social media platforms is **Exhibit-PW1/B4**.

viii. He deposed that the request for mutual legal assistance from a US-based social media platform is still pending. Once the information sought through the letter for mutual legal assistance is received from the US, further legal proceedings will be initiated in accordance with the law.

FIR No. 211/2021, PS: Special Cell, Delhi.

ix. PW-1 deposed that FIR No.211/2021 was registered on 09.08.2021 at the PS Special Cell, Delhi, under sections 13, 18, 18(B), 20, 39 of the Unlawful Activities (Prevention) Act and sections 124A, 153 and 120B of the Indian Penal Code (IPC). The case originated from confidential intelligence regarding a video message posted on the Twitter handle @zahrae_kh. In this message, Gurpatwant Singh Pannun, the General Counsel for Sikhs For Justice (SFJ), allegedly offered a \$1 million reward to any uniformed police personnel who could prevent Indian Prime Minister Narendra Modi from hoisting the National Flag at the Red Fort on August 15, 2021.

x. PW-1 further deposed that the video and its message were further disseminated by several other users, amplifying its reach and potential impact. Gurpatwant Singh Pannun called for support for the SFJ, with the intention of advancing the activities of the organization by declaring a substantial bounty. This act was part of a broader attempt by Pannun to incite hatred and disaffection towards the Government of India, as he openly challenged the authority of the Indian state by encouraging actions to disrupt the official Independence Day ceremonies. A copy of the FIR No. 211/2021 dated 09.08.2021 is **Exhibit-PW1/C1**. Photo of twitter handle of “@ zahrae_kh” & othrs is **Exhibit-PW1/C2**. **Exhibit-PW1/C3** is the copy of the notices served to various social media platforms. **Exhibit-PW1/C4** is the copy of the letter for mutual legal assistance seeking information from US based social media.

xi. He further stated that the request for mutual legal assistance directed at a US-based social media platform is currently pending. Upon receipt of the information requested in the mutual legal assistance letter from the US, further legal proceedings will be initiated according to the law.

FIR No. 06/2022, PS Special Cell, Delhi.

xii. PW-1 testified that FIR no. 06/2022, dated 12.01.2022 was registered at the PS Special Cell, Delhi, under sections 13, 18 and 20 of the Unlawful Activities (Prevention) Act (UA(P) Act) along with sections 153, 153-A and 506 of the Indian Penal Code (IPC). The complaint was filed by Sh. Vishnu Shankar Jain, an Advocate-on-Record practicing at the Supreme Court of India. The allegation stemmed from incidents on January 10, 2022, when he, along with several members of the Supreme Court Advocates-on-Record Association (SCAORA), received telephonic calls from an international long-distance (ILD) number +447418365564. A Copy of FIR No. 06/2022 dated 12.01.2022 PS Special Cell is **Exhibit-PW1/D1**.

xiii. The caller in these calls purportedly took responsibility for the blockade of the Indian Prime Minister’s convoy in Firozpur, Punjab, on January 5, 2022. Furthermore, the calls, which were pre-recorded audio messages from Gurpatwant Singh Pannun, who identified himself as the General Counsel for the designated unlawful association 'Sikhs For Justice' (SFJ), contained threatening language. The message

explicitly directed the Honorable Judges of the Supreme Court to abstain from involving themselves in legal proceedings related to the incident concerning the Prime Minister's security breach.

xiv. The witness further deposed that these statements were deemed to pose a serious threat to the unity, integrity and security of India. In response, recordings of these calls were obtained and forwarded to the Central Forensic Science Laboratory (CFSL), Delhi for analysis, alongside a video clip of an interview with alleged Gurpatwant Singh Pannun from the media channel News18. On 06.01.2023, CFSL issued a report confirming that the voice in the recorded calls was similar to the voice sample of Gurpatwant Singh Pannun, supporting the allegations made in the FIR. **Exhibit-PW1/D2** is a copy of the audio recordings are (in a pendrive); **Exhibit-PW1/D3** is a copy of seizure memo dated 23.03.2022 and 06.07.2022; **Exhibit-PW1/D4** is a Copy of CFSL report dated 06.01.2023;

xv. He also deposed that during the investigation into the threat calls made regarding the blockade of the Indian Prime Minister's convoy, authorities made significant efforts to trace the origin and users of the phone numbers involved. These calls, which originated outside India, were linked to serious threats and claims of involvement in the security incident.

xvi. He further deposed that the investigative team reached out to international telecom service providers to determine the users associated with the specific phone numbers from which the threat calls were made. Nexmo, a US-based telecom service provider, revealed that the numbers in question—+19059631429, +447520660952, +447418365564 and +447418366865—were registered under the name of the organization 'Sikhs For Justice' (SFJ) based in the USA. A Copy of the reply received from Nexmo is **Exhibit-PW1/D5**. A copy of the statement of the Complainant viz. Vishnu Shankar Jain dated 23.03.2022 is **Exhibit-PW1/D6**. A true copy of the threat complaints received from Sh. Deepak Prakash and others is **Exhibit-PW1/D7**. **Exhibit-PW1/D8** is a copy of the notices served to various social media platforms. **Exhibit-PW1/D9** is a copy of the letter for mutual legal assistance seeking information from US based social media platforms.

xvii. The witness further deposed that the request seeking information from US based TSPs, ISPs and social media platforms is awaited and further proceedings will be filed upon receiving information sought in terms of the letter written for mutual legal assistance from US.

FIR No.18/2023, PS: Special Cell, Delhi.

xviii. PW-1 testified that the **FIR No. 18/2023** was registered at the PS Special Cell, Delhi, on 19.01.2023, under sections 153B and 120B of the IPC. This case was initiated in response to incidents where pro-Khalistani graffiti appeared in several areas of Western Delhi, including Vikaspuri, Janakpuri, Paschim Vihar, Peeragarhi and Meera Bagh. The graffiti displayed slogans such as "*Khalistan Zindabad*," "*SFJ*," "*1984*," "*Punjab Banega Khalistan*," and "*Referendum 2020 vote for Khalistan*" in both English and Punjabi.

xix. He further deposed that a video surfaced on social media featuring Gurpatwant Singh Pannun, who claimed responsibility for the graffiti. This video further indicated that the organization Sikhs for Justice (SFJ) was not only endorsing but actively promoting secessionist sentiments through such public displays and digital messages. The actions were seen as part of a broader conspiracy to undermine the sovereignty and territorial integrity of India. A Copy of the FIR No. 18/2023 dated 19.01.2023 is **Exhibit-PW1/E1**.

xx. During the course of investigation, two accused namely Vikram Singh s/o Ashok Singh r/o C-61A, Tilak Vihar, Tilak Nagar, Delhi and Balram Singh s/o Mahender Singh r/o H.No 1109, DESU waligali, top floor, Mahipalpur, Delhi were arrested on 29.01.2023. Copies of arrest memo dated 29.01.2023 of accused Vikram Singh and Balram Singh is **Exhibit-PW1/E2**.

xxi. He also deposed that Balram Singh disclosed that he and Vikram Singh were responsible for painting pro-Khalistan graffiti across various locations in West Delhi. He stated that they acted under the directions of Gagandeep Singh, who is associated with Gurpatwant Singh Pannun, a known figure in the secessionist group Sikhs For Justice (SFJ). Further adding to his initial disclosure, Balram Singh elaborated that during the act of painting this graffiti, Vikram Singh received a video call from Gagandeep Singh. Notably, Gurpatwant Singh Pannun was also present during this call. Pannun directly instructed Vikram Singh to focus the graffiti efforts in areas predominantly inhabited by Sikhs to foster a sense of unity toward the cause of creating a separate state of Khalistan. For his involvement in these activities, Vikram Singh was compensated with Rs. 50,000. It was disclosed that after completing the graffiti, Vikram Singh communicated with Gagandeep Singh by sharing photos of the painted slogans and subsequently spoke with Gurpatwant Singh Pannun over the phone, further indicating a coordinated effort to propagate secessionist messages through visible public acts. A copy of the disclosure statements of accused Balram Singh is **Exhibit-PW1/E3**.

xxii. The witness deposed that in the ongoing investigation under FIR No. 18/2023, accused Vikram Singh provided additional details about the logistical and financial arrangements behind the pro-Khalistan graffiti activities in West Delhi. He confirmed that he, along with Balram Singh, executed the painting of pro-Khalistan slogans at various locations as per the instructions of Gagandeep Singh, who is linked to Gurpatwant Singh Pannun of Sikhs For Justice (SFJ). Vikram Singh disclosed that for his participation in these activities, he received financial compensation. He was paid a sum of Rs. 30,000, which was facilitated through an international money transfer. The funds were sent by Gagandeep Singh from the United States using RIA Money, a well-known money transfer service. Vikram Singh collected this amount from a UNIMONI money transfer shop located at 44-A, Laxmi Plaza, Cantt. Road, Lucknow, Uttar Pradesh.

xxiii. PW-1 deposed that the payment receipt for this transaction was recovered during the investigation, serving as tangible evidence linking the financial support from Gagandeep Singh to the activities carried out by Vikram Singh. The copies of disclosure statements dated 29.01.2023 of accused Vikram Singh are **Exhibit-PW1/E4**. Copy of documents regarding transfer of Rs. 30,000/- from US based Gagandeep Singh to accused Vikram Singh are **Exhibit-PW1/E5**.

xxiv. He further deposed that a mobile phone used by the accused Vikram Singh to communicate with his SFJ handler was recovered from his possession. The phone was subsequently sent to the Forensic Science Laboratory (FSL) for examination. During the analysis, photographs related to the incidents described in the case were retrieved from the device. A copy of the seizure memo of the mobile phone dated 29.01.2023 is **Exhibit-PW1/E6** and copies of images recovered at FSL are **Exhibit-PW1/E7**.

xxv. He further stated on oath that during the course of investigation, both the accused had identified Gurpatwant Singh Pannun through his photo that he was there with Gagandeep Singh during a video call. Copy of memos of identification of Gurpatwant Singh Pannun are **Exhibit-PW1/E8**.

xxvi. The witness stated that on instance of both the accused, the pointing out memo's of the locations, where they had painted graffiti, were prepared. Copies of pointing out memo's dated 19.01.2023 (along with translated typed copies) are **Exhibit-PW1/E9**.

xxvii. He further stated that in a significant statement given under Section 161 of the Cr.P.C., Mr. Raj Kishore on 03.02. 2023, reported that on 18.01.2023, the accused Vikram Singh had purchased ten bottles of spray paint. A copy of the statement of Mr. Raj Kishore dated 03.02.2023 under Section 161 Cr.P.C. (along with its true typed translated copy) is **Exhibit-PW1/E10**. A copy of the original charge sheet and supplementary charge sheet is **Exhibit-PW1/E11** & **Exhibit-PW1/E12** respectively.

FIR No.47/2024, PS: Uttam Nagar, Delhi.

xxviii. PW1 testified that the FIR No. 47/2024 was registered on 19.01.2024, at the Uttam Nagar Police Station, Delhi, under section 3 of the Delhi Prevention of Defacement of Public Property Act. This registration followed an incident where the phrase "*KHALISTAN ZINDABAD*" was found painted on the wall of Govt. Sarvodya Bal Vidyalaya in Uttam Nagar, New Delhi, on the same day. The content of the graffiti clearly promoted secessionist activities. A Copy of the FIR No. 47/2024 dated 19.01.2024 is **Exhibit-PW1/F1**.

xxix. He stated that during the investigation significant progress was made with the arrest of one individual Sanny Singh, also known as Sunny, residing at A-98, Shiv Vihar, A-Block, Vikas Nagar, Delhi. The arrest memo is **Exhibit-PW1/F2**.

xxx. He deposed that upon arrest, Sanny Singh disclosed key information during his interrogation. He admitted to painting the pro-Khalistan graffiti, stating that he did so under the instructions of Gagandeep Singh, who is currently residing in the USA and is associated with Gurpatwant Singh and the organization Sikhs For Justice (SFJ). His disclosure statement was taken on the same day as his arrest and a translated copy of this statement is **Exhibit-PW1/F3**. Further investigation revealed that Sanny Singh received financial compensation for his actions. He was paid Rs 30,000 by Gagandeep Singh for painting the graffiti, which he received through Muthoot Finance. The payment receipt from Muthoot Finance pertaining to this transaction was recovered from Sanny Singh, establishing a financial link to the act of vandalism. This receipt, along with other relevant seizure documents, is **Exhibit-PW1/F4**. Additionally, the transaction record from Ria Money, used for transferring the payment is **Exhibit-PW1/F5**. The witness stated that these exhibits collectively provide concrete evidence of the financial and organizational connections behind the incident.

FIR No. 106/2024, PS: Nihal Vihar, Delhi.

xxxi. PW-1 testified that the FIR No. 106/2024 was registered on 16.01.2024 under Section 3 of the Delhi Prevention of Defacement of Public Property Act at PS Nihal Vihar, Delhi. The case was initiated following an incident where graffiti stating "*26 JANUARY SFJ KHALISTAN VOTER REGISTRATION*" was painted on a wall alongside a drain within the jurisdiction of PS Nihal Vihar. Copy of the FIR is **Exhibit-PW1/G1**.

xxxii. He deposed that the investigation led to the arrest of Sanny Singh, alias Sunny, from A-98, Shiv Vihar, A-Block, Vikas Nagar, Delhi, on 02.02.2024. The arrest memo is **Exhibit-PW1/G2**.

xxxiii. The witness deposed that during interrogation, Sanny Singh disclosed that he had executed the pro-Khalistan graffiti under the directives of Gagandeep Singh, who is based in the USA and has associations

with Gurpatwant Singh and the secessionist organization Sikhs For Justice (SFJ). The disclosure statement, along with its translated version is **Exhibit-PW1/G3**.

xxxiv. The witness further deposed that Sanny Singh revealed that he received financial compensation for his involvement in painting the graffiti. He stated that he was paid Rs.30,000 through Muthoot Finance, arranged by Gagandeep Singh. The authenticity of this transaction was confirmed at Muthoot Finance and the transaction records were acquired. These financial documents, including a letter from Muthoot Finance dated 16.09.2024 and the transaction record from Ria Money, are collectively **Exhibit-PW1/G4 (Colly)**.

xxxv. PW-1 further stated that the registration of seven FIRs against Gurpatwant Singh Pannun and his organization, Sikhs For Justice (SFJ), subsequent to its ban, underscores the ongoing engagement of Pannun and SFJ in clandestine cession and secessionist activities. These continued activities suggest that despite the ban, the organization has not ceased its efforts to undermine state stability and promote secession. The evidence compiled through these FIRs indicates that if the ban on SFJ is not extended, the organization is likely to regain strength and possibly escalate its efforts. Also resurgence has the potential to revive militancy and terrorism in Punjab specifically and could affect other parts of India as well. Moreover, SFJ's ongoing activities pose a significant risk of escalating subversive actions aimed at creating a separate Khalistan nation by severing the territory of Punjab from the Union of India, thereby destabilizing the government established by law.

24. PW-2

i. PW-2 Sanjay Dutt, Assistant Commissioner of Police, Special Cell, South Western Range, Delhi Police, tendered his affidavit **Exhibit-PW2/A** after due authorization by the Competent Authority. He deposed regarding the FIR No. 28 dated 27.08.2023, registered under sections 153, 153A, 505 IPC and Section 03 Delhi Prevention of Defacement of Property Act at PS Nangloi Metro Station, New Delhi (listed at Sr. No. 87 of the Background Note); FIR No. 697 dated 28.08.2023, registered under sections 153, 153A, 505/34 IPC and Section 03 Delhi Prevention of Defacement of Property Act at PS Nangloi, New Delhi (listed at Sr. No. 88 of the Background Note); FIR No. 705 dated 28.09.2023, registered under sections 153, 153A, 153/B, 505 IPC, 120-B IPC and Section 03 Delhi Prevention of Defacement of Property Act at PS Kashmiri Gate, New Delhi (listed at Sr. No. 89 of the Background Note); FIR No. 469 dated 18.12.2023, under Section 03 Delhi Prevention of Defacement of Property Act at PS Hari Nagar, New Delhi (listed at Sr. No. 90 of the Background Note) and FIR No. 75 dated 26.01.2024, under Section 03 Delhi Prevention of Defacement of Property Act at PS Tilak Nagar, New Delhi (listed at Sr. No. 93 of the Background Note). Additionally, there are FIRs No. 314/24 and 315/24, both dated 22.07.2024 registered under sections 192,196 & 351 Bharatiya Byay Sanhita (BNS) & Sections 10,13&18 of UAPA at PS Special Cell, New Delhi. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 35 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 28/2023, PS: Nangloi Metro Station, New Delhi.

- ii. Witness deposed that the FIR No. 28, dated 27.08.2023, was registered at PS-Nangloi Metro Station, New Delhi, under sections 153, 153A, 505 IPC and Section 3 of the Delhi Prevention of Defacement of Property Act. The case involved anti-national, pro-Khalistani graffiti found at various metro stations, including Shivaji Park, Madipur, Paschim Vihar, Surajmal Stadium and Nangloi Metro Stations. The slogans included messages such as “G-20 PUNJAB IS NOT INDIA KHALISTAN SFJ ZINDABAD” “G-20 PUNJAB IS NOT INDIA-SFJ”, “KHALISTAN REFERENDOM ZINDABAAD-SFJ” and “MODI INDIA’S COMMITTED GENOCIDE OF SIKHS SFJ.” The case was later transferred to the Special Cell for further investigation.
- iii. He deposed that during investigation, two accused Pritpal Singh and Rajvinder Singh alias Kala, were arrested on 06.09. 2023. They revealed that they had painted the graffiti on the orders of SFJ leader Gurpatwant Singh Pannun in exchange for 2 lakh rupees. The charge sheet was submitted to the Court on October 31, 2023.
- iv. Copy of FIR No. 28/23, along with its translated version is **Exhibit-PW2/A1**. Photographs of the graffiti are **Exhibit-PW2/A2**. The disclosure statements of the accused, along with their translated copies, are **Exhibit-PW2/A3**. The charge sheet, along with its typed copy, is **Exhibit-PW2/A4** and the 15 witness statements with their translations are **Exhibit-PW2/A5**.

FIR No. 697/2023, PS Nangloi, Delhi

- v. PW-2 testified that the FIR No. 697, dated 28.08.2023, was registered at PS Nangloi, New Delhi, under sections 153, 153A, 505 IPC and Section 3 of the Delhi Prevention of Defacement of Property Act, after pro-Khalistani graffiti was discovered on multiple locations in Nangloi, New Delhi, shortly before the G-20 Summit. The slogans, including “KHALISTAN ZINDABAAD” and “KHALISTAN IS OPINION NOT TERRORISM SFJ,” were found on the walls of Surajmal Stadium and the Rajkiya Sarvodaya Kanya Vidhalaya. The case was initially registered based on a complaint by Ct Manoj, PS Nangloi. The case was then transferred to the Special Cell for further investigation.
- vi. He deposed that after conducting an extensive search, analyzing CCTV footage and reviewing call detail records, the Special Cell arrested two suspects, Pritpal Singh and Rajvinder Singh alias Kala, on August 31, 2023. During interrogation, the accused disclosed that they had painted the graffiti on the instructions of Gurpatwant Singh Pannun, leader of Sikhs for Justice (SFJ) and were paid INR 2,00,000 for the task. A search at Pritpal’s residence led to the recovery of ₹2 lakhs in cash, which he admitted was payment from Pannun. Furthermore, Pritpal’s phone was analyzed, revealing chats, videos and audio notes exchanged with Pannun via the Signal App, including a contact saved as “NRI Pannu.”. The charge sheet against the accused was filed in the concerned Court on November 28, 2023 and the next hearing was scheduled for November 25, 2024, for the framing of charges. The copy of FIR No. 697/2023, along with its translated version, is **Exhibit-PW2/A6**. Photographs of the graffiti are **Exhibit-PW2/A7**. The disclosure statements of the accused, along with their true translated copies, are **Exhibit-PW2/A8**. The seizure memo for the cash recovered from Pritpal’s residence, along with its translated copy, is **Exhibit-PW2/A9**. The seizure memos for Pritpal’s mobile phone, along with copies of the chats between Pritpal and Pannun, are **Exhibit-PW2/A10**

and **Exhibit-PW2/A11**. The charge sheet, along with its translated version, is **Exhibit-PW2/A12** and the 18 witness statements recorded under Section 161 Cr.P.C., with translations, are **Exhibit-PW2/A13**.

FIR No. 705/2023, PS: Kashmere Gate, Delhi

vii. PW-2 deposed that the FIR No. 705/2023 was registered on 19.11.2023 under sections 153, 153A, 153B, 505, 120B IPC and Section 3 of the Delhi Prevention of Defacement of Property Act at PS Kashmere Gate, Delhi, after pro-Khalistani slogans were found written on a roadside wall under the Yudhister Setu Flyover near Metro Gate No. 5 and 6, Kashmere Gate, on 27.09.2023. The slogans, including DELHI BaNayga Khalistan SFJ” & “KHALISTAN ZINDABAD SFJ” were discovered during a routine patrol by HC Sandeep of PS Kashmere Gate. A copy of the FIR, along with its true translated copy, is **Exhibit-PW2/A14** and photographs of the graffiti are **Exhibit-PW2/A15**.

viii. He deposed that during investigation, it was revealed that Malak Singh, alias Malik, from Kurukshetra, Haryana, was involved in the incident. He was arrested on 19.11.2023 after a tip-off led the police to his location in Mehmoodpur, Kaithal, Haryana. Upon interrogation, Malak Singh confessed to writing the slogans under the direction of his handler, SFJ leader Gurpatwant Singh Pannun and disclosed that he had been in constant contact with Pannun via the Signal App. Malak Singh further revealed that he had been instructed to write additional slogans near Delhi Airport and that Pannun had encouraged him to promote the Khalistan ideology and engage in secessionist activities. The copy of the disclosure statements, along with the true translated copy, is **Exhibit-PW2/A16**. A mobile phone was recovered from the accused, containing incriminating evidence. The seizure memo, along with the translated copy, is **Exhibit-PW2/A17**. The chats between Malak Singh and Pannun, which were found on the phone, were transcribed and are included as **Exhibit-PW2/A18**. These chats further revealed that Pannun had been urging Malak Singh to take more significant actions and suggested fleeing to Nepal. The voice sample of Malak Singh was also obtained and sent for comparison with voice notes recovered from his phone.

ix. He deposed that a charge sheet against Malak Singh was filed on 16.01.2024 before the Court. The charge sheet and its translated copy are **Exhibit-PW2/A20**. The video footage of the accused near the incident, saved on a pendrive, is **Exhibit-PW2/A21**. On 15.10.2024, a video interview of Gurpatwant Singh Pannun, downloaded from YouTube, was sent to FSL Rohini for comparison with a voice note of Pannun recovered in this case. The seizure memo for this pendrive is **Exhibit-PW2/A22**.

x. He further testified that the case is currently listed before the Court for framing of charges against the accused. Malak Singh is a habitual offender, being involved in two other FIRs—FIR No. 81/2023 and FIR No. 48/2023—both related to unlawful activities. He is currently in judicial custody in Haryana.

FIR No. 469/23 PS- Hari Nagar, Delhi

xi. PW-2 deposed that FIR No. 469/23 was registered on 18.12. 2023 at Police Station Hari Nagar, Delhi, under Section 3 of the Delhi Prevention of Defacement of Public Property Act, 2007, following the discovery of graffiti with the message "KHAL 24 SFJ 26 JAN" on Metro Pillar No. P-509 near Tilak Nagar Metro Station. The registration of the FIR and its translated version are **Exhibit-PW2/A23**, while a photograph of the graffiti is **Exhibit-PW2/A24**.

xii. He deposed that during the investigation, CCTV footage was meticulously analyzed, leading to the identification of the suspect, Lakhminder Singh alias Laddu, son of Jagdev Singh, a resident of WZ-76, 3rd floor, SabtGarh, Tilak Nagar, Delhi. Further inquiries revealed that Lakhminder Singh had previously obtained ₹10 lakh from his in-laws for a planned family trip to the USA. After committing the offence, the accused immediately proceeded to the airport and fled the country. To facilitate his apprehension, a Look-Out Circular (LOC) **Exhibit-PW2/A25** was issued. The police also recorded the statements of ten witnesses under Section 161 of the Cr.P.C., which are **Exhibit-PW2/A26**.

xiii. PW-2 testified that the case remains under active investigation, with the evidence, including exhibits and witness statements, forming the basis of the prosecution's case against the accused.

FIR No. 75/24, PS- Tilak Nagar, Delhi

xiv. PW-2 deposed that on January 26, 2024, graffiti with the slogan “*DELHI BNEGA KHALISTAN*” was discovered on the outer wall of MCD Park, Block 6, Tilak Nagar, New Delhi, leading to the registration of FIR No. 75/24 under Section 3 of the Delhi Prevention of Defacement of Public Property Act at Police Station Tilak Nagar. The FIR and its translated copy are **Exhibit-PW2/A27** and a photograph of the graffiti is **Exhibit-PW2/A28**.

xv. He testified that during the investigation, the accused, Jasvinder Singh, son of Charanjeet Singh, a resident of WZ-33, Plot No. 100, 1st Floor, Tilak Nagar, New Delhi, was arrested. He was later released on police bail. Jasvinder Singh disclosed that he had written the graffiti using black spray paint at the behest of his friend Gagandeep Singh, who resides in the USA. Jasvinder further admitted that he recorded a video of the act and sent it to Gagandeep. The interrogation report and its translation is **Exhibit-PW2/A29**, while Jasvinder's disclosure statement, along with its translation, is **Exhibit-PW2/A30**.

xvi. Witness deposed that a black spray bottle was recovered from beneath the driver's seat of Jasvinder's Ritz car. The seizure memo and its translated copy is **Exhibit-PW2/A31**. Statements from two witnesses under Section 161 of the Cr.P.C with copies and translations are **Exhibit-PW2/A32**. Chargesheet was filed before the Court on July 23, 2024. A copy of the chargesheet and its translation are **Exhibit-PW2/A33**. The case is currently at the stage of framing charges against the accused.

xvii. In order to show that the organization SFJ (Sikhs for Justice) and its patron, Gurpatwant Singh Pannun, have continued their secessionist activities despite the extension of the ban by the MHA on 08.07.2024 the witness deposed that FIRs 314/2024 and 315/2024 were registered later for offences that occurred after the Ministry of Home Affairs (MHA) had been notified about the earlier incidents.

FIR NO. 314/2024, PS Special Cell, Delhi.

xviii. PW-2 further testified that on 21.07.2024 at approximately 11:26 PM, a threatening pre-recorded voice note was received by Sh. A. A. Rahim, a Member of Parliament (Rajya Sabha) from Kerala (CPIM), on his mobile phone via a call from an international number (+447418603423). To document the call, the MP placed it on speaker and recorded it using another device. The pre-recorded message, purportedly from Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), stated:

(i) "...Sikh for Justice ... bombard Indian Parliament to Red Fort area with Khalistan referendum message to open eyes and ears of the Indian ruler under which Sikhs are

facing existential threat. Members of Parliament, if you don't want to ... the Khalistan referendum message must ... stay home... Gurpatwant Singh Pannun, Sikh for Justice General Counsel."

xix. Shortly after this incident, Dr. V. Shivdasan, another Member of Parliament (Rajya Sabha) from Kerala (CPIM), received the same threatening message via a call on his mobile phone, but this time from an Indian number.

xx. PW-2 deposed that regarding the incident a case FIR NO. 314/2024, dated 22/07/2024, under Sections 192, 196 and 351 of the Bharatiya Nyay Sanhita (BNS) & Sections 10,13&18 UAPA was registered at PS Special Cell, Delhi. The investigation included analyzing the pre-recorded voice note, seeking its forensic verification against prior public interviews of the suspect and reaching out to Interpol to identify the user of the international number. The investigation is ongoing, with further efforts to gather additional evidence to corroborate the allegations. The copy of FIR No. 314/2024 and its typed version is **Exhibit-PW2/A34**, the transcript of the threatening pre-recorded voice message, along with its typed copy is **Exhibit-PW2/A35**, the seizure memo of the pre-recorded voice note and its typed copy is **Exhibit-PW2/A36**, copy of the threatening pre-recorded voice message is **Exhibit-PW2/A37**, statements from five witnesses recorded under Section 180 BNSS, along with their typed copies is **Exhibit-PW2/A38** and the letter written to Interpol for the identification of the user of international number +447418603423 is **Exhibit-PW2/A39**.

FIR NO. 315/2024, PS Special Cell, Delhi.

xxi. Regarding FIR No.315/2024, PW-2 testified that on 21.07.2024, at approximately 11:31 PM, a threatening pre-recorded voice note was received on the landline at the residence of the Hon'ble Defence Minister of India. The call was answered by Havildar Anoop P. Soman, who was on official duty at the time. According to his account, the pre-recorded voice message stated:

"...Sikhs for Justice is going to bombard Indian Parliament to Red Fort area with Khalistan Referendum message. To open the eyes and ears of the Indian rulers under which Sikhs are facing existential threat. Members of Parliament, if you don't want to experience Khalistan referendum, stay home."

The message was identified as coming from Gurpatwant Singh Pannun, the founder of Sikh for Justice. As a result, FIR NO. 315/2024, dated 22.07.2024, under sections 192,196&351 BNS and sections 10,13&18 UAPA was registered at PS Special Cell, Delhi. During the investigation, a letter was sent to Interpol to identify the user of the international number +447418603423. The investigation is ongoing, with further efforts to collect additional evidence.

xxii. Copy of FIR No. 315/2024 and its true typed copy is **Exhibit-PW2/A40** and a copy of the letter written to Interpol for the identification of the user of the international number +447418603423 is **Exhibit-PW2/A41**.

xxiii. PW2 further deposed that, based on his personal knowledge acquired over 35 years of service as a police officer and drawing from historical facts and material available on record and in the public domain,

he fully agrees with the conclusions derived by the Central Government. Despite being banned for five years under the Unlawful Activities (Prevention) Act (UAPA), Sikh for Justice (SFJ) has continued its unlawful activities since 2019 through various illicit and illegitimate channels. These activities are prejudicial to the internal security of India, disrupt public order and have the potential to harm the peace, unity and integrity of the country. Witness stated that the following unlawful activities of SFJ fall within the meaning of clauses (o) and (p) of sub-section (1) of section 2 of the UAPA, 1967:

- a) SFJ is involved in anti-national and subversive activities in Punjab, New Delhi and elsewhere, aimed at disrupting the sovereignty and territorial integrity of India.
- b) SFJ maintains close ties with militant outfits and activists, supporting violent extremism and militancy in Punjab and other regions, with the intention to sever Punjab from the Union of India and create a sovereign Khalistan state.
- c) SFJ is actively encouraging and aiding the cession of Indian territory, supporting separatist groups fighting for this cause both in India and abroad and engaging in activities designed to disrupt the sovereignty and territorial integrity of India.

25. PW-3

i. **PW-3 Ashish Khari**, Inspector of Police, CIB Division, National Investigation Agency (NIA), New Delhi tendered his affidavit **Exhibit-PW3/P** after due authorization by the Competent Authority and deposed *w.r.t.* **RC-12/2021/NIA/DLI** mentioned at Serial No. 2 (cases registered by National Investigation Agency) of Annexure II to the Reference Note/Background Note. He deposed that the contents of his affidavit are based on record revealed during investigation as well as on his personal knowledge acquired during the 19 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

RC-12/2021/NIA/DLI

ii. **PW-3** testified that he is the Chief Investigating Officer (CIO) of RC-12/2021/NIA/DLI and proved copy of FIR **Exhibit-PW3/P1**.

iii. **PW-3** deposed that that on 18.06.2021, the Ministry of Home Affairs directed the NIA to investigate the activities of Sikh for Justice (SFJ). This was prompted by a video uploaded by Gurpatwant Singh Pannun, SFJ's Chief, in which Pannun, a designated terrorist under the UAPA, urged soldiers from Punjab, West Bengal and Maharashtra to desert the Indian Army and return to their home states. He further advocated for the balkanization of India, calling for the independence of individual states. The video revealed Pannun openly promoting secession and undermining the national integrity of India. SFJ had been trying to exploit socio-economic concerns, particularly related to the Covid-19 pandemic, to advance its cause under the pretext of 'Referendum 2020'. Copy of the FIR is **Exhibit-PW3/P1**.

iv. He further deposed that during the investigation, it was found that Gurpatwant Singh Pannun was actively using cyberspace to spread his secessionist propaganda, targeting the sentiments of people in Punjab and beyond. SFJ's use of social media platforms to issue threats against government officials was also noted, with a goal to incite violence and disaffection. The investigation uncovered that Pannun had uploaded six

provocative videos on YouTube, all aimed at spreading the Pro-Khalistan ideology and inciting discontent with the Indian Government. These videos contained content intended to promote the balkanization of India and support for secessionist movements. The videos were compiled on a pendrive **Exhibit-PW3/P3** and the transcript of the videos is **Exhibit-PW3/P4**.

v. He deposed that the six videos contained alarming messages, including a video claiming that the UN had accepted a complaint against India's Prime Minister and Home Minister for their alleged role in R-Day violence against farmers. They also attempted to provoke the Chief Ministers of West Bengal and Maharashtra to declare independence from India. Furthermore, Pannun and SFJ announced a \$250,000 bounty on Army officers who participated in Operation Blue Star, accusing them of committing genocide. Other videos encouraged soldiers to close state borders and promoted separatism, while also offering monetary rewards under the guise of Covid-19 assistance, including a Rs. 3000 "oxygen money" to citizens of various states. During investigation statements of two retired Army officers were recorded u/s 161 of Cr.P.C. and the same are **Exhibit-PW3/P2**.

vi. PW-3 deposed that Section 82 of Cr.P.C. proceedings were initiated and on 18.07.2023, the Special NIA Court declared Gurpatwant Singh Pannun a Proclaimed Offender. **Exhibit-PW3/P5** is the copy of order dated 18.07.2023 declaring him a Proclaimed Offender. The chargesheet for this case has not yet been filed as the investigation is ongoing.

vii. The witness testified that despite being banned under the Unlawful Activities (Prevention) Act (UAPA) for five years, SFJ has continued its unlawful activities since 2019. He agreed with the Central Government's conclusions that SFJ's ongoing actions pose a serious threat to India's internal security, public order and national unity, particularly through its support for separatism. He affirmed that SFJ's activities align with the definitions in clauses (o) and (p) of Section 2 of the UAPA, which address activities disrupting India's sovereignty and territorial integrity.

viii. PW-3 further testified that the unlawful activities of the SFJ fall under the provisions of clauses (o) and (p) of sub-section (1) of section 2 of the Unlawful Activities (Prevention) Act, 1967, specifically: (i) SFJ is involved in anti-national and subversive activities in Punjab, New Delhi and elsewhere, intended to disrupt the sovereignty and territorial integrity of India; (ii) SFJ is in close contact with militant outfits and activists, supporting violent extremism and militancy in Punjab and other regions, aiming to sever the territory of Punjab from the Union of India to establish a sovereign State of Khalistan; (iii) SFJ is encouraging and aiding activities for the secession of a part of Indian territory from the Union, supporting separatist groups fighting for this cause and engaging in actions that disrupt India's sovereignty and territorial integrity.

26. PW-4

i. **PW-4 Balwinder Singh Randhawa**, PPS, Superintendent of Police, Investigation, Gurdaspur, Punjab tendered his affidavit **Exhibit PW-4/A** after due authorization from the Competent Authority. The witness deposed regarding the FIR No. 42 dated 02.06.2022 registered under section 153-B IPC, Police Station Kalanaur, District Gurdaspur mentioned at Serial No. 29 of Annexure II to the Reference Note/Background Note placed before this Hon'ble Tribunal by the Ministry of Home Affairs, Union of India.

The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 36 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 42/2022, PS-Kalanaur, District Gurdaspur, Punjab.

ii. PW-4 testified that on the evening of 02.06.2022, ASI Harminder Singh, along with other police officers (ASI Tarsem Singh, ASI Sukhdev Singh and CT Balwinder Kumar), were conducting a patrol in a private vehicle for searching bad elements. At T-Point Kalanaur, a secret informer informed ASI Harminder Singh that an A4 paper with a handwritten message in black marker was pasted at several locations, including the gate of Government Industrial Training Institute, Kalanaur, the board outside the Punjab and National Bank, near the Tehsil Kalanaur, in front of the power house Kalanaur, the board of the Government Market Committee Dharam Kanda Kalanaur and the bus stand outside the Kalanaur and Suvidha Center Wadala Bagar facility. The message written on the papers stated:

*“Khalsa Raj Sant Baba Jarnail Singh Bhindranwala, the real right of Punjab,
Khalistan Zindabad Hindustan Murdabad, the Sikh community will live and take
revenge.”*

iii. PW-4 further deposed that upon receiving this information, ASI Harminder Singh and his team arrived at the locations and took the published templates into custody. CT Balwinder Kumar was sent to the police station with the Rukka, leading to the registration of FIR No. 42 and the initiation of the investigation.

iv. He deposed that a thorough investigation was conducted over a period of thirteen months to identify the individuals responsible for the act described in FIR No. 42. Despite the best efforts of the police, the identity of the miscreants could not be determined. As a result, an Untrace Report under section 173 Cr.P.C. was prepared by the SHO of Police Station Kalanaur on 11.07.2023. This report was subsequently presented in the Court on 13.06.2024 and the same has been accepted by the Court of Ms. Shaveta Thakur, JMIC, Gurdaspur vide order dated 13.06.2024. **Exhibit PW-4/P-1** is a true copy of FIR No. 42 of 2022 in vernacular. **Exhibit PW-4/P-2** is the English-translated copy of FIR No. 42 of 2022. **Exhibit PW-4/P-3** is the true copy of the seizure memos of posters. **Exhibit PW-4/P-4** is the English-translated copy of the seizure memos. **Exhibit PW-4/P-5** is the true copy in vernacular of the untrace report filed in the case. **Exhibit PW-4/P-6** is its English-translated copy. **Exhibit PW-4/P-7** is the true copy of the final order dated 13.06.2024 passed by the court of Ms. Shaveta Thakur, JMIC, Gurdaspur.

v. PW-4, drawing upon his 36 years of experience as a police officer, publicly available information, social media content and the records of FIR No. 42, testified that he agreed with the conclusions of Ministry of Home Affairs in respect of action against Sikhs For Justice (SFJ), its leader Gurpatwant Singh Pannun and its members. He outlined several key points: SFJ consistently encouraged and advocated for the secession of Punjab from India; incited separatist groups along religious lines to destabilize the Indian government; engaged in actions described in the FIR aimed at disrupting India’s territorial integrity and inciting local Sikh communities to challenge the Indian government’s authority in Punjab; promoted anti-national and separatist

sentiments harmful to India's integrity and security; actively escalated the secessionist movement and unlawful activities within India, particularly in Punjab and Sikh-populated areas; and tacitly supported militancy and violence to achieve its secessionist goal of creating Khalistan.

vi. PW-4 also testified that he concurred with the Central Government's conclusions that, despite being banned under the UA(P)A, SFJ had continued its unlawful activities since 2019, posing a threat to India's internal security and disrupting public order. He specified that these activities fell under the definition of unlawful activities as defined by the Unlawful Activities (Prevention) Act, 1967, including: SFJ's involvement in activities aimed at disrupting India's sovereignty and territorial integrity; SFJ's support for militant outfits and extremism in Punjab and other areas with the aim of separating Punjab from India and establishing Khalistan; and SFJ's encouragement of secessionist activities and support for separatist groups. PW-4 further deposed that if SFJ's unlawful activities were not curbed, they could lead to the revival of militancy and terrorism in Punjab and other parts of India and escalate efforts to create Khalistan by destabilizing the Indian government.

27. PW-5

i. **PW-5 Manmohan Singh Aulakh**, Superintendent of Police (Investigation), District Mansa, Punjab tendered his affidavit **Exhibit-PW5/A** after due authorization by the Competent Authority. He deposed regarding FIR No. 119 dated 14.05.2022, registered under Section 505 IPC and Section 3 of the Prevention of Defacement of Property Act, 1985, at PS City Budhlada, District Mansa, Punjab. This FIR is a new case and not mentioned in Annexure II to the Reference Note/Background Note. He stated that the contents of affidavit are based on record revealed during investigation as well as on his personal knowledge acquired during a decade of service as a Police Officer. Further, documents annexed to the affidavit are true copies of the respective originals.

FIR No. 119/2022 PS-City Budhlada, District Mansa, Punjab

ii. PW-5 deposed that on 14.05.2022 during routine patrolling, ASI Gurmail Singh and his team received information from a secret informer about objectionable handwritten posters on a railway flyover at Boha Road. The posters displayed slogans such as "*Freedom 2020 Vote India Out of Khalistan, US Media International etc.*," intended to evoke Khalistani sentiments and promote anti-India secessionist propaganda. The posters were unlawfully pasted on government property. Upon inspecting the site, ASI Gurmail Singh prepared a rukka (report) and sent it to the police station, leading to the registration of the FIR.

iii. Witness further deposed that a thorough investigation in the FIR No. 119/2022 was conducted over a period of seven months. The investigation aimed to identify and apprehend the accused responsible for pasting objectionable posters promoting Khalistani sentiments and anti-India propaganda on government property. Witness also stated that despite exhaustive efforts by the investigating team, the identity of the miscreants could not be ascertained. Consequently, an Untrace Report under Section 173 Cr.P.C. was prepared by the SHO of PS City Budhlada on 28.12.2022. This report was subsequently presented before the Learned Court on 09.09.2023. The Untrace Report has been accepted by the Court of Ms. Jasika Viz, PCS, JMIC, Budhlada, District Mansa, Punjab vide order dated 09-09-2023. **Exhibit – PW 5/P-1** is a true copy of

FIR no. 119 of 2022 in Vernacular and **Exhibit – PW5/P-2** is its English translated copy. **Exhibit – PW5/P-3** is the true copy of Seizure memos of Posters in Vernacular seized in the present case and **Exhibit – PW5/P-4** is its English translated copy of the Seizure memos of Posters seized in the present case. **Exhibit – PW5/P-5** is the true copy in Vernacular of the Untrace Report and **Exhibit – PW5/P-6** is its true English translated copy. **Exhibit– PW5/P-7** is true copy of the final order dated 09-09-2023 passed by the Hon’ble Court of Ms. Jasika Viz, PCS, JMIC, Budhlada, District Mansa.

iv. PW-5 further deposed that SFJ persistently advocates for the secession of Punjab from India, inciting separatist groups and destabilizing the government by promoting anti-national sentiments. Despite being banned under the Unlawful Activities (Prevention) Act (UAPA) since 2019, SFJ continues to engage in activities that threaten India's unity, integrity and public order. Witness also testified that SFJ has been spearheading secessionist movements, supporting militancy and inciting violence along religious lines to further its agenda of creating a separate Khalistan state. He noted SFJ’s links with militant outfits and its efforts to encourage violent extremism, posing a significant threat to India’s sovereignty and internal security. PW-5 stated that if SFJ's activities are not curbed immediately, they could revive militancy in Punjab and escalate subversive actions across the country.

28. PW-6

i. **PW-6 Ramanpreet Singh Gill**, Deputy Superintendent of Police, Detection, in District Sri Muktsar Sahib, Punjab, tendered his affidavit **Exhibit-PW6/A** after due authorization by the Competent Authority. He deposed regarding FIR No. 01 dated 03-01-2023, registered under Sections 124-A, 153-A, 153-B and 34 of the IPC at Police Station Sadar, Sri Muktsar Sahib. This FIR is listed at Serial No. 43 of Annexure II to the Reference Note submitted by the Ministry of Home Affairs before the Tribunal. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 03 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 01/2023 Police Station Sadar, Sri Muktsar Sahib, Punjab.

ii. PW-6 deposed that on 03.01.2023 ASI Jarnail Singh, along with a police party, was patrolling and checking suspicious individuals and vehicles along the route from Village Udekaran to Village Sangudhaun. The police received a tip-off about suspicious activity near a deserted area beside the back boundary wall of the SSP Office on Bathinda Road, Sri Muktsar Sahib, towards Village Sangudhaun. Upon reaching the location, the police discovered Pro-Khalistani slogans written in black paint, including messages such as “*Indira Thoki, Rahul Thoko, Punjab Khalistan Rocket Referendum.*” ASI Jarnail Singh inspected the site and sent a report (rukka) to the police station, which led to the registration of the FIR and the initiation of the investigation.

iii. He deposed that a thorough investigation was conducted over a period of four months to identify the perpetrators and bring them to justice. Despite the best efforts made, the identity of the individuals responsible for the incident could not be determined. As a result, an Untrace Report under section 173 of the Cr.P.C. was

prepared by the SHO of Police Station Sadar on 03.05.2023 and was subsequently presented to the Court on 04.12.2023. The Untrace Report was accepted by the Court of Sh. Jatinderpal Singh, President Officer/National Lok Adalat, through an order dated 09.12.2023. **Exhibit PW6/P-1** is a true copy of FIR No. 01 of 2023 in vernacular. **Exhibit PW6/P-2** is its English-translated copy. **Exhibit PW6/P-3** is a true copy of the Untrace Report in vernacular. **Exhibit PW6/P-4** is the English-translated version of the Untrace Report. **Exhibit PW6/P-5** is a true copy of the final order dated 09.12.2023 passed by Sh. Jatinderpal Singh, President Officer/National Lok Adalat.

iv. PW-6 deposed that Sikhs for Justice (SFJ), led by Gurpatwant Singh Pannun, actively promotes the secession of Punjab from India, inciting separatist sentiments and supporting militancy to further its agenda of creating Khalistan. Despite being banned under the UAPA since 2019, SFJ continues its unlawful activities, threatening India's sovereignty, security and public order. The organization collaborates with militant groups and uses subversive methods to destabilize the government. The witness further deposed that unchecked, these activities could revive militancy in Punjab and escalate threats to national security.

29. PW-7

i. **PW-7 Sukhwinder Singh**, Deputy Superintendent of Police in Ferozepur, Punjab, tendered his affidavit **Exhibit-PW7/A** after due authorization by the Competent Authority. He deposed regarding FIR No. 130 of 2022, registered at Police Station Sadar, Ferozepur, under sections 124-A, 153-A, 153-B and 34 of the Indian Penal Code mentioned at Serial No. 33 in Annexure II of the Reference Note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 32 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 130/2022, Police Station Sadar, Ferozepur, Punjab.

ii. PW-7 deposed that on 13.06.2022, Deputy Superintendent of Police (DSP) Satwinder Singh, along with his gunman and reader, was traveling in a government vehicle when a secret informer provided information about pro-Khalistan slogans ("*Sikh for justice*" and "*Khalistan Zindabad*") written on the wall of the Divisional Railway Manager's office in Ferozepur, accompanied by posters. The informer also showed a video in which Gurpatwant Singh Pannun, speaking as the General Counsel of Sikhs For Justice (SFJ), claimed responsibility for the slogans, including one at the residence of the Deputy Commissioner of Ferozepur. In the video, Pannun made provocative remarks about the area, which were seen and heard by the DSP. This message was shown to the DSP on the informer's mobile phone. Based on these facts, FIR No. 130 was registered for conspiring to disrupt peace, misuse public property and engage in anti-national activities.

iii. PW-7 further testified that the matter is currently under investigation, with ongoing efforts to identify and arrest the individuals responsible for writing the pro-Khalistan graffiti. The witness relied on several documents as part of his evidence. **Exhibit-PW7/P1** is a copy of FIR No. 130 of 2022 in vernacular, along

with its English-translated version, **Exhibit-PW7/P2**. Copy of seizure memo containing photographs and a video (stored in a pen drive) of the location where the slogans were written is **Exhibit-PW7/P3** along with its certified English translation, **Exhibit-PW7/P4**. A copy of a video of Gurpatwant Singh Pannun (stored in a pen drive) and its transcript is **Exhibit-PW7/P5**.

iv. PW-7 deposed that he concurred with the conclusions of Ministry of Home Affairs about Sikhs For Justice (SFJ), its patron Gurpatwant Singh Pannun and its members. He stated that SFJ has consistently advocated for Punjab's secession from India, inciting separatist groups along religious lines to destabilize the government and disrupt India's territorial integrity. Further, promotion of anti-national and separatist sentiments pose a direct threat to India's security. The organization has facilitated unlawful activities, particularly in Punjab and other Sikh-majority areas and tacitly supported militancy and religious violence to further its goal of establishing a separate Khalistan state within India.

30. PW-8

i. **PW-8 Sarabjit Singh**, Superintendent of Police (Investigation) in Hoshiarpur, Punjab tendered his affidavit **Exhibit-PW8/A** after due authorization by the Competent Authority. He deposed with respect to FIR No. 93, registered on 06.08.2016 at Police Station Chabbewal, Hoshiarpur. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during his service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 93/2016, PS-Chabbewal, Hoshiarpur, Punjab.

ii. PW-8 testified that the FIR No. 93/2016, dated 06.08.2016 under Sections 10, 11 and 13 of the Unlawful Activities (Prevention) Act, 1967 and Sections 25, 54 and 59 of the Arms Act, was registered at Police Station Chabbewal, Hoshiarpur. During investigation, additional charges under Sections 17, 19, 38 and 39 of the UAPA and Section 9(B) of the Explosives Act, 1884, were added. The case originated when the Station House Officer (SHO) and a police party, conducting vehicle and suspect checks near JNJ Palace in Chabbewal, received reliable information regarding Harjap Singh, a resident of Bhilowal and currently in the United States and Avtar Singh, alias Darshan Singh, a resident of Chakkowal Shekhan currently in Italy. Both individuals were identified as members of the Khalistan Liberation Force, a proscribed organization under the UAPA. They were reportedly disseminating false narratives among vulnerable individuals in Punjab and attempting to revive terrorism in the state by providing financial support to recruit young people and procure weapons.

iii. Witness deposed that the investigation revealed that Jaspreet Singh, alias Jassa; Hardeep Singh, alias Deepa; Kuldeep Singh, alias Deep; and Bikramjeet Singh were in contact with Balwinder Singh, alias Bittu, who resided in Ramu Thiara village. Acting on instructions from Harjap Singh and Avtar Singh conveyed via the Internet, social media and mobile communication, the accused were directed to acquire weapons, ammunition and explosives to carry out a significant act of violence.

iv. Subsequent searches and recoveries included 40 live cartridges from Bikramjeet Singh, ten shirts printed with "Punjab Independence Day Referendum 2020," and 200 grams of sulfur (gandhak) potash from

Kuldeep Singh. Additionally, five similar shirts, a motorcycle, books and a pistol were recovered from Jaspreet Singh. The investigation also led to the recovery of five shirts with similar slogans from Hardeep Singh. Based on these findings, Section 9(B) of the Explosives Act, 1884 was added to the case on 14.04.2017, under DDR No. 21.

v. PW-8 further deposed that the accused Jaspreet Singh, alias Jassa and Hardeep Singh alias Deepa, both residents under PS Chabbewal, were convicted under Section 25 of the Arms Act on 03.04.2019 and released from jail on 01.08.2019. Kuldeep Singh alias Deep, a resident of Mohalla Shekhan, Hoshiarpur, was convicted under Section 9B of the Explosives Act, 1884, on 03.04.2019 and released the same day. Bikramjeet Singh, a resident of Ainokot under PS Ghuman, was acquitted of charges on 02.04.2019.

vi. He further deposed that Balwinder Singh alias Bittu, initially from Purhira and later residing in Ramu Thiara under PS Bullawal, was arrested on 04.07.2019 and a supplementary charge sheet was filed on 18.11.2020. However, he passed away on 02.10.2021. Harjap Singh alias Japhi, a resident of Bhilowal, was declared a Proclaimed Offender on 23.01.2018, with a Look Out Circular issued against him. Similarly, Avtar Singh, a resident of Chakkowal Shekhan under PS Bullawal, was declared a Proclaimed Offender on 15.12.2016 and an LOC was issued for him as well.

vii. The witness relied on several documents in his evidence. **Exhibit-PW8/P-1** is a true copy of the First Information Report (FIR) in the vernacular language. **Exhibit-PW8/P-2** is the certified English translation of the FIR. **Exhibit-PW8/P-3** is a certified copy of the judgment. **Exhibit-PW8/P-4** is a compilation of a true copy of the seizure memos in the vernacular and their certified English translation. **Exhibit-PW8/P-5** is a set comprising a true copy of the disclosure memos in the vernacular and their certified English translation.

viii. PW-8 further deposed that the allegations and FIRs against Gurpatwant Singh Pannun and his organization, Sikhs for Justice (SFJ), have been registered after the group was banned earlier. This demonstrates that Pannun and other SFJ leaders have persistently engaged in secessionist and anti-national activities. He deposed that there is a strong belief that if the ban on SFJ is not extended or its activities are not effectively curbed, it could lead to the resurgence of militancy and terrorism, particularly in Punjab and potentially spread to other parts of the country. The organization's subversive agenda includes attempts to destabilize the lawfully established government and carve out a separate Khalistan nation by severing Punjab from the Union of India.

31. PW-9

i. **PW-9 Paramjit Singh**, Inspector, Counter Intelligence, Bathinda tendered his affidavit **Exhibit-PW9/A** after due authorization by the Competent Authority. He deposed regarding FIR No. 233 of 2023, registered at Police Station Canal Colony, Bathinda listed at Serial No. 52 of Annexure II to the Reference/Background Note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during his service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 233/ 2023, Police Station-Canal Colony, Bathinda,

ii. PW-9 deposed that FIR No. 233 of 2023 was registered at Police Station Canal Colony, Bathinda, under sections 153, 153A, 505 and 120B of the Indian Penal Code. The Counter Intelligence, Bathinda in coordination with the CIA-2 Staff Bathinda, received a tip-off about two individuals, Harmanpreet Singh, son of Kaku Singh, a resident of Naseebpura (Kailebandar) under PS Talwandi Sabo and Lovepreet Singh, son of Jagsir Singh, a resident of Kotshamir under PS Sadar, both in Bathinda district. The information indicated that the two individuals were active members of Sikhs for Justice (SFJ) and had planned to write pro-Khalistani and SFJ slogans on public buildings. Acting on this tip-off, a joint operation was conducted, during which both suspects were apprehended. The operation led to the recovery of three spray cans and a piece of saffron cloth with "Khalistan Zindabad" and "SFJ" written in black spray paint.

iii. Witness further deposed that during the investigation, the suspects, Harmanpreet Singh and Lovepreet Singh, admitted to having established contact with Jagjeet Singh, an individual associated with Sikhs for Justice (SFJ), via Twitter in August 2023. Following his instructions, they carried out several activities, which included:

- a. On 15th August 2023, they hoisted a Khalistan flag under a bridge in Bathinda.
- b. On 3rd October 2023, Lovepreet Singh wrote pro-Khalistani slogans in Dharmshala, Himachal Pradesh.
- c. On 23rd October 2023, both individuals wrote Khalistan slogans at Hanumangarh Railway Station in Rajasthan.
- d. On 28th November 2023, they wrote "Khalistan Zindabad" and "SFJ" slogans at Bhandari Bridge Railway Station, Amritsar.

iv. The suspects further disclosed that they received monetary compensation from Jagjeet Singh through Western Union for carrying out the activities. The case is still under investigation.

v. PW-9 relied on several documents during his deposition. **Exhibit-PW9/P1** is a copy of FIR No. 233, along with its English-translated version as **Exhibit-PW9/P2**. The Seizure Memo, which includes bottles of spray paint, a mobile phone, a motorcycle and a Kesri flag, is marked as **Exhibit-PW9/P3**, with its attested English translation as **Exhibit-PW9/P4**. The statements of six witnesses recorded under Section 161 Cr.P.C. during the investigation are collectively marked as **Exhibit-PW9/P5**, with their English translations collectively marked as **Exhibit-PW9/P6**.

vi. The witness stated on oath that he fully concurred with the conclusions of the Ministry of Home Affairs regarding Sikhs for Justice (SFJ), its patron Gurpatwant Singh Pannun and its leadership. He affirmed that SFJ has consistently advocated for Punjab's secession from India, actively inciting separatist groups along religious lines to destabilize the government and promote the cause of Punjab's separation. He further stated that the actions documented in the FIRs reveal SFJ's intent to undermine India's territorial integrity by encouraging the Sikh community to reject the lawful authority of the Indian government in Punjab. The witness also asserted that SFJ has fostered anti-national and separatist sentiments, posing a direct threat to India's security and integrity. He added that the organization has conspired to escalate secessionist movements and unlawful activities, particularly in Punjab and other Sikh-majority regions. Further, SFJ has

supported militancy and incited violence along religious lines, with the goal of establishing an independent Khalistan state within Indian territory.

32. PW-10

i. **PW-10 Navjot Singh**, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar, Punjab, tendered his affidavit **Exhibit-PW10/A** after due authorization by the Competent Authority. He deposed *w.r.t.* four FIRs bearing No.168/2020 (listed as serial no. 20 in the background note), FIR No. 04/2024 (listed at serial no. 54 in the background note), FIR No. 69/2022 (listed at serial no. 31 in the background note) and additional FIR No. 23/2023. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 22 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 168/ 2020 ,PS: B-Division, District Commissionerate Amritsar, Punjab

ii. PW-10 deposed that the FIR No. 168 of 2020 was registered on 02/07/2020 at Police Station B-Division, District Commissionerate Amritsar, Punjab, under various sections, including 504, 124-A, 153-A of the IPC, Section 2 of the Prevention of Insult to National Honour Act, 1971, Section 3 of the SC and ST (Prevention of Atrocities) Act, 1989 and Section 10 and 13 of the Unlawful Activities (Prevention) Act, 1967. The case was initiated based on the statement of Loveleen alias Love Mattu, son of Raj Kumar, resident of H.N. 3301, Gali No.1, Near Bhagwan Valmiki Mandir, Ghee Mandi, Amritsar who reported the circulation of a video featuring Gurpatwant Singh Pannun, who identifies himself as the legal advisor of Sikhs for Justice (SFJ) and the propagator of the "Referendum-2020" movement. The video, posted on the UK Media International Facebook page, shows Pannun alongside images of the Indian Constitution and the Indian National Flag. During the video, one of his associates is seen holding a lit torch (Mashaal). Pannun begins the video with the Sikh religious phrase "Waheguru Ji Ka Khalsa, Waheguru Ji Ki Fateh," followed by provocative remarks. He urges members of Sikhs for Justice to set fire to Indian embassies around the world.

iii. The witness quoted the excerpts of Pannun's statement as per translated and transcribed copy as contained in the video as follows:

"Wahguru Ji Ka Khalsa Waheguru Ji Ki Fateh, Indian Constitution and Indian Tricolor call to set fire to Indian embassies around the world by Sikhs for Justice. The invitation has been given, but today it is very important to mention how many people gave the first invitation to set fire to the Indian Constitution. Listen to what Dr. Bhimrao Ambedkar had to say in 1953, who said that my friends told me that you wrote the Indian Constitution and today I was compelled to say that I would be the first person to burn that Constitution because that Constitution I don't believe because that constitution can't do any good for anyone. These words came from Dr. Bhimrao Ambedkar on 2 September 1953. Dr. Bhimrao Ambedkar gave the second invitation in 1955 when he was asked in the same parliament that why do you want to burn the Indian Constitution? Then Dr.Bhimrao Ambedkar's answer was that I made the

Constitution of India to build a temple, but when demons come into the temple, it will be better to burn it and blow it. The Sikh community and Punjab has to be understood that this Indian Constitution, the Hindu flag of India, gave Sikhism the status of a part of Hinduism and under this Constitution of India, Akal thakt was demolished in 1984. This Constitution of India took away your Religion, your speech, your water, your electricity and your right to live has been abolished under this constitution and the only solution is to abolish the Indian constitution forever. The real Punjab should be freed. Today, Punjab has to understand that either you are on the side of the tricolor or you are on the side of khalsa. Long Live Khalistan. Long live Khalistan."

iv. Witness further testified that in the video, Gurpatwant Singh Pannun and his accomplices are seen setting fire to the Indian National Flag and images of the Indian Constitution. Pannun raises slogans in support of Khalistan and urges Sikhs worldwide to embrace their religious identity while rejecting any connection to India. He also claims that the Indian Constitution has caused the deaths of numerous Sikhs and has led to the martyrdom of over 150,000 Sikh warriors and more than 10 million Sikhs.

v. Witness deposed that Pannun's provocative statements incite unrest and the video, which was publicly shared, dishonors both the Indian Constitution and the National Flag. His remarks directly challenge the values upheld by Dr. B.R. Ambedkar, causing offense to the Scheduled Caste (SC) community. The rhetoric demonstrates an intent to stir communal discord and disturb public order.

vi. PW-10 further deposed that since SFJ has been designated an unlawful association by the Government of India, further investigations into Pannun's activities were initiated. A Look-Out Circular (LOC) was issued against him on January 30, 2023 and a follow-up LOC was issued on December 29, 2023. However, Pannun remains at large and has yet to be apprehended. The investigation into the case is ongoing.

vii. **Exhibit-PW10/P1** is the copy in vernacular of FIR No. 168 of 2020 and **Exhibit-PW10/P2** is its true English translation. **Exhibit-PW10/P3** is the true copy of the statement dated 16.07.2020 of the witness Rahul Malik, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P4** is the true copy of the statement dated 07.09.2020 of the witness Amit Danav, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P5** is the true copy of the statement dated 07.10.2020 of the witness Ashwani Kumar, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P6** is the true copy of the statement dated 23.09.2020 of the witness Pawanjeet Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P7** is the true copy of the statement dated 14.10.2020 of the witness ASI Malkiat Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P8** is the true copy of the statement dated 16.07.2020 of the witness Nirvail Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P9** is the true copy of the Seizure Memo of a CD dated 16.07.2020, along with its translation. **Exhibit-PW10/P10** is the true copy of the video (in CD) of Gurpatwant Singh Pannun and its transcript. **Exhibit-PW10/P11** is the true copy of

the order of issuance of Warrant dated 25.01.2021 along with the warrant. **Exhibit-PW10/P12** is the true copy of the examination report No. CFSL(C)/1016/2022/PHY-333/2022/461 dated 28.02.2023.

FIR No. 23/2023, PS-Verka, District-Commissionerate Amritsar ,Punjab.

viii. PW-10 deposed that FIR No. 23 of 2023 dated 07.03.2023 has not been mentioned in the background note. However, the same directly relates to the unlawful activities of SFJ and constitutes additional evidence which bears proof of illegal activities of SFJ and is relevant for declaring SFJ as unlawful association. FIR No. 23 of 2023 was registered at Police Station Verka under Sections 124-A, 153-A, 504, 120-B of the Indian Penal Code (IPC) and Section 66F of the Information Technology Act. The FIR was filed against Gurpatwant Singh Pannun, Attorney-cum-General Counsel for Sikhs for Justice (SFJ), following the circulation of a viral video.

ix. Witness deposed that in the video, Pannun begins with the phrase "Waheguru Ji Ka Khalsa, Waheguru Ji Ki Fateh" and makes provocative statements. He declares that "Punjab is not a part of India" and announces plans to disrupt train services on March 15 and 16. He also claims that the flag of Khalistan has been hoisted at Verka Bypass in Amritsar in protest, coinciding with the G-20 summit being held in the city. A banner with the message "G-20 welcome to Khalistan" was displayed, reiterating the claim that "Punjab is not India."

x. Witness further testified that Pannun criticizes the Bhagwant Mann-led government, alleging that while the state spends 100 crores on infrastructure and beautification projects, Punjab's farmers are driven to suicide due to neglect. He directs a threatening message in the video towards Amit Shah and Bhagwant Mann, saying, "*The dead bodies that arrive at our homes will one day reach yours too.*" Pannun further warns that train stations at Amritsar, Ludhiana, Bathinda and Firozpur will be shut down on March 15 and 16 to send a message that "Punjab is not part of India." He asserts that SFJ supporters are present at Verka Bypass in Amritsar and will confront the G-20 delegates during their visit on those dates, chanting, "Long live Khalistan."

xi. PW-10 also deposed that during a search, a yellow banner was recovered from the railing of the road near the BRTS Bus Depot at Verka Bypass. The banner contained provocative messages, including "*G-20 welcome to Khalistan,*" "*Punjab is not India,*" and an appeal to stop train services on March 15-16. It also included the slogan "*SFJ Zindabad.*" This banner serves as concrete evidence that Gurpatwant Singh Pannun and his associates were involved in illegal activities. They had circulated a viral video on social media, inciting the people of Punjab to support the Khalistan movement and to disrupt train services during the G-20 summit.

xii. The witness has deposed that the investigation into this case is ongoing. The accused of the case Gurpatwant Singh Pannun is still at large, but continuous efforts are being made for the same.

xiii. **Exhibit-PW10/P13** is the true copy in vernacular of FIR No. 23 of 2023 and **Exhibit-PW10/P14** is its true English translation. **Exhibit-PW10/P15** is the true copy of the statement dated 07.03.2023 of the witness SI/SHO Nishan Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P16** is the true copy of the statement dated 07.03.2023 of the witness ASI Mukandbir Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation.

Exhibit-PW10/P17 is the true copy of the statement dated 07.03.2023 of the witness Sukhram, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P18** is the true copy of the statement dated 07.03.2023 of the witness Shambhu Paaswan, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P19** is the true copy of the statement dated 07.03.2023 of the witness Vinod Paaswan, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P20** is the true copy of the statement dated 07.03.2023 of the witness Bablu, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P21** is the true copy of the statement dated 07.03.2023 of the witness ASI Sukhjit Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P22** is the true copy of the statement dated 07.03.2023 of the witness Johnson, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P23** is the true copy of the statement dated 07.03.2023 of the witness Amrinder Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P24** is the true copy of the Seizure Memo of a banner and CD. **Exhibit-PW10/P25** is the true copy of the video of Gurpatwant Singh Pannun in a CD along with its transcript.

FIR No. 04/2024, PS: D-Division, District Commissionerate Amritsar Punjab,

xiv. PW-10 deposed that the FIR No. 04 of 2024, dated 23.01.2024, was registered at Police Station D-Division, District Commissionerate Amritsar (Punjab), under Sections 153-A, 153-B, 505 of the IPC and Section 66(F) of the Information Technology Act. The FIR was filed against Gurpatwant Singh Pannun, the Legal Advisor for Sikhs for Justice, New York (United States of America), following the circulation of a viral video on a social media platform. In the video, Pannun is seen making statements that undermine the unity and integrity of India, inciting religious enmity, promoting hate speech and fostering division among different communities. His remarks create ill-will, spread fear and insecurity and threaten national integrity. The case is under investigation, but no arrest has been made yet. Efforts to apprehend Gurpatwant Singh Pannun are ongoing, as he remains at large.

xv. **Exhibit-PW10/P26** is the true copy in vernacular of FIR No. 04 of 2024 dated 23.01.2024 and **Exhibit-PW10/P27** is its true English translation. **Exhibit-PW10/P28** is the true copy of the statement dated 23.01.2024 of the witness ASI Manpreet Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P29** is the true copy of the statement dated 24.01.2024 of the witness Arun Khanna, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P30** is the true copy of the statement dated 24.01.2024 of the witness Pink Raj, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P31** is the true copy of the statement dated 24.01.2024 of the witness Lakshmi Kant Chawla, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P32** is the true copy of the statement dated 24.01.2024 of the witness Rakesh Kumar, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P33** is the true copy of the Seizure Memo of the Pen Drive dated 23.01.2024. **Exhibit-PW10/P34** is the true copy of the video of Gurpatwant Singh Pannun and its transcript/translation.

FIR No. 69/2022, P S: E-Division, District Commissionerate Amritsar, Punjab

xvi. PW 10 deposed that the FIR No. 69 of 2022, dated 06.06.2022, was registered at Police Station E-Division, District Commissionerate Amritsar (Punjab), under Sections 121 and 121-A of the IPC following the circulation of a viral video on social media. The video appears to have been made near Nishan Sahib of Shri Akal Takhat Sahib, where one person can be seen speaking, while another appears to be listening. The speaker in the video chants, “*Live long Sikhs for Justice, Referendum Zindabad, Khalistan Zindabad.*” The supporting individual is seen endorsing these statements. The content of the video has the potential to incite communal discord and disturb public order in the country.

xvii. Witness also testified that the speech in the video is viewed as an attempt to wage or incite war against the Government of India, leading to the registration of the case. Two individuals, Manjit Singh @ Baba Shaheed, son of Kundan Singh, resident of Village Jhour Kalan, PS Sadar, District Gurdaspur and Saudagar Singh @ Saudagar, son of Nand Singh, resident of Village Virk, PS Sidhwan Bet, District Ludhiana Rural, were arrested on 06.06.2022 in connection with this case. Additionally, two mobile phones were recovered from the arrested individuals. The chargesheet in FIR No. 69 of 2022 was filed on 23.08.2022 against the accused, Manjit Singh @ Baba Shaheed, son of Kundan Singh, resident of Village Jhour Kalan, PS Sadar, District Gurdaspur (currently a tenant at the residence of Harjit Singh, Ex-SDO, Village & Police Station Ajit Wal, District Moga) and Saudagar Singh @ Saudagar, son of Nand Singh, resident of Village Virk, PS Sidhwan Bet, District Ludhiana Rural. The trial in the case is ongoing.

xviii. **Exhibit-PW10/P35** is the true copy in vernacular of FIR No. 69 of 2022 and **Exhibit-PW10/P36** is its true English translation. **Exhibit-PW10/P37** is the true copy of the statement dated 06.07.2022 of the witness Sahib Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P38** is the true copy of the statement dated 06.07.2022 of the witness ASI Harjit Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P39** is the true copy of the statements dated 06.07.2022, 12.06.2022 and 27.07.2022 of the witness HC Amrinder Singh, recorded under Section 161 Cr.P.C. in vernacular, along with their English translations, collectively. **Exhibit-PW10/P40** is the true copy of the statement dated 12.06.2022 of the witness CT Sukhmanjit Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P41** is the true copy of the statement dated 27.07.2022 of the witness HC Raghbir Singh, recorded under Section 161 Cr.P.C. in vernacular, along with its English translation. **Exhibit-PW10/P42** is the true copy of the video of Gurpatwant Singh Pannun in a CD along with its transcript/translation. The true copy of chargesheet in vernacular & true English translation of chargesheet in FIR No. 69 of 2022 are **EXHIBIT-PW10/P43 & EXHIBIT-PW10/P44** respectively.

xix. PW-10 fully endorsed the Ministry of Home Affairs' assessment regarding the activities of Sikhs for Justice (SFJ). He affirmed that SFJ, under the leadership of Gurpatwant Singh Pannun, has persistently advocated for the secession of Punjab from the Indian Union and engaged in unlawful activities aimed at destabilizing the government and undermining India's territorial integrity. Despite being banned under the Unlawful Activities (Prevention) Act (UAPA), SFJ has continued its illegal operations, posing a grave threat

to India's national security, public order and unity. During his testimony, the witness emphasized SFJ's vigorous campaign for the creation of an independent Khalistan, targeting separatist groups within the Sikh community to challenge the authority of the Indian government. He testified that SFJ's activities have directly undermined India's territorial integrity by provoking members of the Sikh community to reject the government's legitimate authority. SFJ has fostered anti-national sentiments and facilitated unlawful activities, particularly in Punjab and other Sikh-majority regions, to escalate secessionist movements. The organization has also indirectly supported militancy and encouraged violence to further its Khalistani agenda.

xx. The witness deposed that he had strong concerns about SFJ's continued operations despite the ban and stressed the need to extend the prohibition on the organization. He deposed that without such measures, SFJ's activities could escalate, posing an even greater threat to India's sovereignty, territorial integrity and internal stability.

33. PW-11

i. PW-11 Rajinder Pal Singh, Deputy Superintendent of Police, Investigation, District Barnala, Punjab, tendered his affidavit **Exhibit-PW11/A** FIR No. 317/2023, dated 12.07.2023, registered under Section 3 of the Punjab Prevention of Defacement of Property Act in which later on Section 153 IPC was invoked. He deposed that this FIR is not part of the background note, but is being submitted as additional evidence to prove the unlawful activities of Sikhs for Justice (SFJ). The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 25 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 317/2023 Police Station City-2 Barnala, Punjab

ii. PW-11 testified that FIR No. 317/2023 was registered in Police Station City-2 Barnala, Punjab, under Section 3 of the Punjab Prevention of Defacement of Property Act, following the defacement of public property with slogans supporting the Khalistan movement. Subsequently, Section 153 of the IPC was invoked as the investigation uncovered that the defacement was intended to incite communal disharmony and hatred between different groups. The FIR was filed after receiving secret information about the defacement of signboards. The information revealed that signboards had been installed outside the office of the Forest Range Officer on Handiaya Road and opposite the rest house, near the residence of the Deputy Commissioner. These signboards were found to have been damaged by an unknown person or persons who wrote "SFJ" in English using black paint.

iii. Witness further deposed that during the investigation, it was discovered that the words "Khalistan" and "SFJ" were written in English with black paint on the signboards outside the Forest Range Officer's office on Handiaya Road. Another signboard, installed opposite the Deputy Commissioner's residence, carried the slogan "*SAHID NIJJAR DA BADLA MODI SHAH THOKO WORLD CUP ROKO SFJ*". A similar signboard was also found on the wall of the Judicial Complex in Barnala.

iv. Witness further deposed that during the investigation, the offence under Section 153-A of the IPC was added on 21-07-2023. On 23-07-2023, based on the statement of Gurmel Singh alias Booti, resident of

Qila Patti, Ward No. 5, Handiaya, Kulvir Singh, resident of Tapa, was named as an accused in the case. Kulvir Singh had already been taken into custody at District Jail Barnala under Section 107/151 of the Cr.P.C. at Police Station Tapa. He was subsequently arrested in this case after receiving a production warrant on 25-07-2023 from the Court of Sh. Munish Garg, CJM Barnala.

v. He deposed that on the disclosure statement made by Kulvir Singh, a spray bottle and a yellow-colored flag, with "*KHALISTAN*" written in Punjabi using black spray paint, were recovered. These items were found in a black polythene bag, hidden in the grass and bushes near the location where the defaced signboard had been installed in front of Spring Valley School. Subsequently, on 20-03-2024, the offence under Section 153-A of the IPC was deleted due to lack of sufficient evidence and instead, the offence under Section 153 of the IPC was added. The matter is now scheduled for the framing of charges on 07.01.2025.

vi. PW-11 further proved the documents on record. **Exhibit-PW11/P1** is the vernacular copy of the FIR, **Exhibit-PW11/P2** is its attested English translation, **Exhibit-PW11/P3** is the seizure memo and its attested translation, **Exhibit-PW11/P4** is the relevant statements of four witnesses along with their attested translations, **Exhibit-PW11/P5** is the charge sheet and its attested translation and **Exhibit-PW11/P6** is the supporting visual evidence in the form of photographs of signboards.

vii. PW-11 testified that the FIR against Gurpatwant Singh Pannun and Sikhs for Justice (SFJ) highlights their continued activities despite the ban on the organization. He deposed that SFJ persistently undermines India's unity and sovereignty, promoting the separation of Punjab. He stated that without extending the ban and implementing stricter measures, SFJ's actions could revive militancy and terrorism, especially in Punjab and spread instability nationwide. SFJ's agenda to create Khalistan threatens India's territorial integrity, risking unrest and violence.

34. PW-12

i. **PW-12 Pawanjit**, Additional Deputy Commissioner of Police (ADCP), Ludhiana, Punjab tendered his affidavit **Exhibit-PW12/A** after due authorization by the Competent Authority. He deposed *w.r.t.* FIR No. 154/2021, registered at P.S. Dehlon and listed in Serial No. 25 of the background note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 35 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 154/2021. Police Station Dehlon, Ludhiana.

ii. PW-12 testified that Harpreet Singh @ Mika, the Sarpanch of Village Gill, reported that some individuals had painted slogans supporting Khalistan, such as "*KHALISTAN ZINDABAD*" and "*KISANA DA HAL, KHALISTAN*" (translating to "the solution for farmers is Khalistan"), on the roads and walls of the village. Following this information, the SHO, along with the in-charge of PP Marado and other police personnel, visited the site. They reviewed CCTV footage and surveyed other locations in the village, directing the Incharge of the local police Chowki to collect as much information as possible about the incident. After

a comprehensive inquiry, the Inspector/SHO registered FIR No. 154/2021 on September 17, 2021, at Police Station Dehlon, Ludhiana under sections 124-A, 153-A, 153-B, 120-B and 473 of the IPC.

iii. He deposed that during the investigation, it was revealed that, on the night of 18/19 August 2021, Gurvinder Singh @ Baba, son of Harpreet Singh, a resident of Assa Patti Village Rampur, Police Station Doraha, Ludhiana and a Child in Conflict with Law, a resident of the same village, wrote the aforementioned objectionable remarks supporting Khalistan on the road and wall of Village Gill using blue spray paint. This act caused panic among the people of the Hindu community in the area. Further investigation revealed that Gurvinder Singh @ Baba and Child in Conflict with Law were acting under the directions of Gurpatwant Singh Pannun, who had provided financial support and other assistance to the accused. Their actions were aimed at creating law and order problems in Punjab. This provided evidence that Gurpatwant Singh Pannun, through these individuals, sought to disrupt the peace and tranquility of Punjab and further an anti-national agenda to destabilize the nation and create a separate Khalistan state.

iv. During the investigation, the Investigating Officer (IO) collected CCTV footage and photographs of the road and wall where the objectionable remarks were written. A site plan was also prepared and statements of witnesses were recorded. On 19.09.2021, Child in Conflict with Law was arrested and a used motorcycle with a fake number plate was recovered from him, along with a mobile phone. Following his disclosure statement under section 27 of the Indian Evidence Act, a blue spray tank was recovered. Consequently, the offence under section 473 IPC was added to the case. After completing the investigation, a report was prepared against Child in Conflict with Law and submitted before Sh. Anudeep Singh, Judge, Juvenile Court. The case is currently under trial, with the next hearing scheduled for 15.12.2024 and Child in Conflict with Law is currently out on bail.

v. PW-12 further testified that another accused, Gurvinder Singh @ Baba, who had been arrested earlier in connection with FIR No. 07/2021 under sections 153-A, 153-B and 120-B IPC, registered at Police Station SAS Nagar, Mohali, was arrested again through a production warrant. After detailed interrogation, Gurvinder Singh @ Baba was sent to Central Jail, Ludhiana, on 05.01.2022. A charge sheet was prepared against him following the completion of the investigation and it was presented in court on 25.02.2022.

vi. The case is currently under trial before Sh. Shiv Mohan Garg, ASJ, Ludhiana, with the next hearing scheduled for 29.10.2024. The third accused, Gurpatwant Singh Pannun, remains at large and has not been arrested yet.

vii. PW-12 relied on a comprehensive set of documents. **Exhibit-PW12/P1** is the true copy of the FIR in vernacular, **Exhibit-PW12/P2** is its attested English translation, **Exhibit-PW12/P3** and **Exhibit-PW12/P5** are two seizure memos presented in vernacular, with their respective English translations as **Exhibit-PW12/P4** and **Exhibit-PW12/P6**. **Exhibit-PW12/P7** is the disclosure statement of the CCL, submitted in vernacular and **Exhibit-PW12/P8** is its English translation. **Exhibit-PW12/P9** is the chargesheet in vernacular, **Exhibit-PW12/P10** is its English translation, **Exhibit-PW12/P11** is the supplementary chargesheet in vernacular and **Exhibit-PW12/P12** is its English translation.

viii. The witness deposed that the investigation revealed that Sikhs for Justice (SFJ), led by Gurpatwant Singh Pannun, continues to promote pro-Khalistani sentiments and separatist activities, despite being

banned.. Pannun plays a central role in inciting militancy and unrest in Punjab and across India, using propaganda to exploit social and religious divides. The witness further emphasized that SFJ's efforts to destabilize India and advocate for Punjab's separation pose a severe threat to national security. He deposed that he concurred with the Ministry of Home Affairs' conclusions and stressed the urgent need for decisive legal action to curb SFJ's activities and prevent further threats to India's sovereignty and stability.

35. PW-13

i. PW-13 Vaibhav Sehgal, Superintendent of Police, Investigation, Malerkotla, Punjab, tendered his affidavit **Exhibit-PW13/A** after due authorization by the Competent Authority. He deposed regarding FIR No. 107/2022, registered on 01.05.2022 under sections 153-A, 153-B of the IPC and Section 3 of the Punjab Prevention of Defacement of Property Ordinance Act, 1997, at Police Station City-I, Malerkotla. This FIR was not mentioned in Annexure II of the Reference/Background Note and is an additional evidence. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during the 10 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 107/2022, Police Station City-I, Malerkotla, Punjab.

ii. PW-13 testified that FIR No. 107, registered on 01.05.2022, relates to an incident in Malerkotla. On 29.04.2022, police received information that a saffron-colored flag and a saffron banner had been hoisted at the Nirankari Bhawan and the side gate of the DC Office in Malerkotla. The flag and banner bore the inscriptions "*Punjab Hall Khalistan*" and "*Khalistan Zindabad*" written in Punjabi. The items were found to be installed by an unknown person, most likely during the night to take advantage of the darkness. Inspector Harjinder Singh and other police officials responded to the scene in a government vehicle and conducted an inquiry. They discovered that the flag featured a Khanda logo along with the separatist slogans, indicating it was part of a pro-Khalistani message. The flag and banner were seized as evidence and further investigation revealed that the installation of these items was likely an attempt by anti-social elements to provoke unrest and law-and-order issues in the area, potentially inciting riots in Malerkotla.

iii. He deposed that CCTV footage was not available for this investigation, as there had been a power cut the previous night, rendering the cameras non-operational. As a result of this incident, FIR No. 107 was registered and investigation was initiated to identify and apprehend those responsible for this act of provocation. During the investigation, based on the statement of ASI Nirbhai Singh, the accused Happy, son of Ram Krishan, resident of Near Shivaji Mandir, Giani Jail Singh Colony, Amargarh, was named as a suspect in the case. The accused, Happy, later made a confessional disclosure statement in which he admitted to committing the offense on the night of 28/29.04.2022. He further disclosed that he intended to install additional flags and banners of the same nature and that the remaining flags and banners were stored in his house, which he could retrieve. This revelation led to further investigations and the collection of additional evidence related to the case.

iv. Upon completion of the investigation, a Challan under Section 173 of the Cr.P.C. was prepared against the accused, Happy and presented before the Court of SDJM, Malerkotla, on 27.06.2022. After taking cognizance of the offenses, the Court framed charges under Sections 153A, 153B of the IPC and Section 3 of the Prevention of Defacement of Property Act, 1997, on 01.10.2022. The case is currently pending trial.

v. PW-13 further testified that based on his 10 years of service as a Police Officer since 2014, supported by material in the public domain, social media and FIR records, he fully concurs with the Ministry of Home Affairs' conclusions regarding Sikhs for Justice (SFJ), its patron Gurpatwant Singh Pannun and its members. He affirmed that SFJ has been actively advocating for Punjab's secession, exploiting religious divides to incite separatist groups and destabilize the Government of India. The acts described in the FIR were deliberate attempts to undermine India's territorial integrity by provoking individuals and groups, particularly within the Sikh community, to challenge lawful authority.

vi. He further proved documents referred in his testimony. **Exhibit-PW-13/P1** is the true copy of the FIR in vernacular, **Exhibit-PW-13/P2** is its English translation, **Exhibit-PW-13/P3** is the memo of arrest of the accused, **Exhibit-PW-13/P4** is its English translation, **Exhibit-PW-13/P5** is the memo of identification and **Exhibit-PW-13/P6** is its English translation. **Exhibit-PW-13/P7** is the memo of personal search in vernacular, **Exhibit-PW-13/P8** is its English translation, **Exhibit-PW-13/P9** is the memo of recovery of a flag and banner in vernacular and **Exhibit-PW-13/P10** is its English translation. **Exhibit-PW-13/P11** is the disclosure statement of the accused in vernacular, **Exhibit-PW-13/P12** is its English translation, **Exhibit-PW-13/P13** is the memo of recovery of a truck in vernacular and **Exhibit-PW-13/P14** is its English translation. **Exhibit-PW-13/P15** is the report from DITAC, Mohali, in vernacular, **Exhibit-PW-13/P16** is its English translation, **Exhibit-PW-13/P17** is the challan in vernacular and **Exhibit-PW-13/P18** is its English translation. Lastly, **Exhibit-PW-13/P19** is the order dated 01.10.2022 framing charges against the accused.

vii. PW-13 stated on oath that that SFJ promotes anti-national and separatist ideologies, masterminding and facilitating unlawful activities, particularly in Punjab and other Sikh-populated regions, to further its goal of establishing Khalistan. Despite being banned under the Unlawful Activities (Prevention) Act (UAPA) since 2019, SFJ has continued its operations, violating provisions of the UAPA related to anti-national and subversive actions that threaten India's sovereignty and integrity. He stated that without immediate intervention, SFJ's activities could lead to a resurgence of militancy and terrorism, particularly in Punjab, while escalating attempts to carve out Khalistan, destabilizing the legitimate government and posing a grave threat to India's unity and security.

36. PW-14

i. **PW-14 Navneet Singh Mahal**, Superintendent of Police (PBI), Rupnagar, Punjab, tendered his affidavit **Exhibit-PW14/A** after due authorization by the Competent Authority. He deposed *w.r.t.* FIR No. 52, dated 13.04.2022, Police Station Rupnagar, under sections 124-A, 153-A, 153-B, 120-B of the IPC and sections 13, 16 and 18 of the UAPA, referenced as Serial No. 27 in the background note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge

acquired during the 10 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition

FIR No. 52, dated 13.04.2022, Police Station in Rupnagar

ii. PW-14 testified that on 13.04.2022, at 7:30 AM, the Police Station Rupnagar received information from the District Police Officer (DPO) of Rupnagar that a banner had been hung from trees by unknown individuals outside the wall adjacent to the main gate of the District Administrative Complex in Rupnagar. The banner bore the inscription "Khalistan.". Thereafter, a video was made viral on social-media by the Representative/Head of Banned Organization "Sikhs for Justice" namely Gurpatwant Singh Pannun in which he is asserting that:

"Wahe Guru Ji Da Khalsa, Wahe Guru Ji Di Fateh" Million congratulations to entire Sikh community for "Khalsa Sajna Diwas" and today, representative of Sikh community by hoisting Khalistani flag on the office of S.S.P. Rup Nagar Police have conveyed a message to the infantry of Delhi governance Bhagwant Maan that representative of Rupnagar Supdt. Sikh community for getting the Punjab freed from Indian occupancy are starting a campaigning with power of Pen and by use of this weapon in the form of Pen we have to get Punjab freed from Indian occupancy. Let, Police of Punjab; Teachers of Punjab; or your family members or any resident of Punjab, every Punjabi person and every Sikh person, is Khalistani. In the time to come, the campaigning for elections for Khalistan Referendum in Punjab, which is going on, date for the same shall be conveyed and by that date, Bhagwant Mann and infantry of Indian governance shall be ruined. "Wahe Guru Ji Da Khalsa, Wahe Guru Ji Di Fateh".

iii. He deposed that during the investigation, the disclosure statements of the accused, Harbir Singh @ Raju and Paramjit Singh @ Pamma, were recorded. They revealed that on the intervening night of 12/13.04.2022, they wrote the word "Khalistan" on a cream-colored bed sheet. Paramjit Singh @ Pamma had purchased a bottle of spray paint from a paint shop near a petrol pump in front of a five-story building located on Morinda-Chamkaur Sahib Road for Rs. 180/-. Using the spray paint, they wrote "Khalistan" on the bed sheet, which had been bought by Harbir Singh. The banner, which was a light yellow-colored bed sheet with the word "Khalistan" written on it, was tied to the trees outside the main wall in front of the main gate of the District Administration Complex in Rupnagar. The banner was seized and later identified by Pawan Kumar, the owner of a shop named Bhatti Walia Di Kapde Di Dukan, who confirmed that he had sold the bed sheet to Harbir Singh. Additionally, based on the disclosure statement of accused Paramjit Singh @ Pamma, a bottle of spray paint was also recovered and taken into possession through a separate memo. The statements of witnesses were recorded under Section 161 of the Criminal Procedure Code (Cr.P.C.). After gathering sufficient material to substantiate the charges, a chargesheet was filed before the learned Court at Rupnagar. Subsequently, on 05.11.2022, charges were framed against the accused. The matter is currently pending trial.

iv. PW-14 further proved documents relied in his testimony. **Exhibit PW-14/P-1** is a copy of FIR No. 52 dated 13.04.2022, which includes the FIR in vernacular along with its English-translated version. **Exhibit PW-14/P-2** is the set of disclosure statements of accused Harbir Singh @ Raju and Paramjit Singh, provided in vernacular along with their English translations. **Exhibit PW-14/P-3** is the recovery memo of a banner on a bed sheet, prepared in vernacular with its English-translated copy. **Exhibit PW-14/P-4** is the identification memo of the bed sheet, presented in vernacular along with an English translation. **Exhibit PW-14/P-5** is the recovery memo of a spray paint bottle, submitted in vernacular and accompanied by its English-translated version. **Exhibit PW-14/P-6** is the chargesheet filed in the case, available in vernacular with its English translation. **Exhibit PW-14/P-7** is the copy of the court order dated 05.11.2022, which framed charges against the accused. **Exhibit PW-14/P-8** is a pen drive containing a video uploaded by Gurpatwant Singh Pannun, along with its transcription, which forms part of the chargesheet.

v. PW-14 further deposed that the FIR was registered against Gurpatwant Singh Pannun and his organization SFJ after it had already been banned in 2019. This highlights that despite the ban, Pannun and other SFJ leaders have continued to engage in clandestine activities aimed at promoting secession and territorial division. He further stated that if the ban on SFJ is not extended, the organization's activities cannot be controlled effectively. Such a failure would likely lead to the resurgence of militancy and terrorism, particularly in Punjab, but also in other parts of the country. Additionally, it could exacerbate subversive efforts, including attempts to carve out a separate Khalistan state by separating Punjab from India by destabilizing the Indian government.

37. PW-15

i. **PW-15 Migom Doley**, Superintendent of Police in the CIB Division of the National Investigation Agency (NIA) in New Delhi tendered his affidavit **Exhibit-PW15/A** after due authorization by the Competent Authority. PW-15 deposed regarding RC No. RC-30/2023/NIA/DLI, registered on 17.11.2023 by the National Investigation Agency under Sections 120B, 153A and 506 of the IPC and Sections 10, 13, 16, 17, 18, 18B and 20 of the Unlawful Activities (Prevention) Act, 1967. The case is mentioned at Serial No. 8 (cases registered by the National Investigation Agency) in Annexure II to the Reference Note/Background Note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 09 years of his service as a Police Officer and 11 months in National Investigation Agency. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition

RC-30/2023/NIA/DLI

ii. PW-15 testified that the investigation of the RC-30/2023/NIA/DLI reveals a larger conspiracy involving Gurpatwant Singh Pannun and his associates. On 04.11.2023, Pannun posted a video on social media, warning members of the Sikh Panth to avoid traveling with Air India after 19th November 2023. He claimed that there would be a 'global blockade' and that their lives could be in danger, further stating that Air India would not be allowed to operate globally. The investigation also uncovered incidents from July 2022,

when members of SFJ removed Pandrol clips at around 60 points on a railway line, approximately 400 yards from the Thermal Power Plant in Khedar, Hisar, Haryana. After the incident, Pannun posted a video claiming responsibility for the sabotage. He explained that his aides had removed the clips to stop the coal supply and warned that this act of rail track sabotage was only the beginning of a larger plan to block coal supplies to various thermal plants across India.

iii. He deposed that in March 2023, Pannun conspired with SFJ members to remove clips from railway tracks in two separate incidents: one near Lehra Mohabbat in Bathinda, Punjab and another near Pathrala Railway Station between Bathinda and Mandi Dabwali. Pannun has been actively inciting SFJ operatives to sabotage railway tracks in Punjab, aiming to cause derailments and accidents involving both passenger and goods trains, particularly those carrying migrant laborers. Furthermore, it was revealed that Pannun is urging his associates to disrupt coal supplies to power plants, potentially causing widespread power outages in Delhi.

iv. PW-15 further deposed that during the investigation of NIA case No.30/2023/NIA/DLI, it was revealed that the organization Sikhs for Justice (SFJ) and its leader Gurpatwant Singh Pannun are actively involved in secessionist activities. Gurpatwant Singh Pannun, who serves as the General Counsel of SFJ, has been promoting acts of terror and violence for several years. SFJ has been targeting essential transportation networks, particularly railway lines and tracks, which are vital for the movement of people and goods across India on a daily basis. Pannun has been orchestrating disruptions to essential services, including damaging railway tracks to disrupt the movement of crucial supplies, such as coal for thermal power plants. The actions of Pannun and his associates pose a significant threat to the transportation sector and the country's infrastructure.

v. The witness also deposed that during the investigation, various videos and photographs of Gurpatwant Singh Pannun, the leader of SFJ, were downloaded from open sources like YouTube and Twitter, with independent witnesses present to validate the evidence. These materials further confirmed that SFJ is essentially a front organization for terrorist groups, with its leaders closely affiliated with and supporting such groups.

vi. He further deposed that the investigation also involved the examination of several witnesses under Section 161 of the Cr.P.C. The statements revealed that members of SFJ have been recruiting impressionable Sikh youth through social media platforms, inciting them to engage in illegal activities against the Government of India. These unlawful activities are being funded through money sent by SFJ's proxies from abroad.

vii. PW-15 deposed that in his professional experience, SFJ has consistently called for the establishment of a sovereign Khalistan within India's territory. SFJ's campaign demonstrates a blatant disregard for India's constitutional framework, encouraging the Sikh community, particularly the impressionable youth, to support secessionist ideals. This agenda has led to multiple FIRs against SFJ and its leaders across India. He also deposed that the investigation revealed that under Gurpatwant Singh Pannun's leadership, Sikhs for Justice (SFJ), in collaboration with fugitive Khalistani separatists, foreign nations and non-state actors hostile to India, has been actively promoting a secessionist agenda. Pannun, through public statements, writings and online videos, has openly declared SFJ's primary objective to be the separation of Punjab from India and the

establishment of Khalistan, which SFJ seeks to achieve by endorsing unlawful and terror-related activities within India.

viii. He further stated that written declarations, proclamations and videos circulated by Pannun on the internet and social media platforms, accessible in the public domain and referenced in other FIRs submitted to the Tribunal, explicitly declare that SFJ's sole purpose is the secession of Punjab from India and the creation of Khalistan. For this objective, SFJ continues to promote and support activities involving illegality and terrorism within India.

ix. He further stated that the matter is still under investigation and chargesheet is yet to be filed. PW-15 relied on several documents to support his testimony. **Exhibit-PW15/P1** is a true copy of RC-30/2023/NIA/DLI dated 17.11.2023, along with the Ministry of Home Affairs, CTCR Division order No. 11011/95/2023/NIA dated 17.11.2023. **Exhibit-PW15/P2** is a copy of the video posted by Gurpatwant Singh Pannun on 04.11.2023, contained in a pendrive. **Exhibit-PW15/P3** includes videos downloaded from open sources, also in a pendrive and **Exhibit-PW15/P4** contains the transcripts of these videos. Finally, **Exhibit-PW15/P5** (colly) is a true copy of the statements of seven witnesses recorded under Section 161 of the Cr.P.C.

x. PW-15 further deposed that based on his professional experience, public domain material and records from relevant FIRs, he concurs with the Ministry of Home Affairs' conclusions regarding Sikhs for Justice (SFJ) and its patron Gurpatwant Singh Pannun. He confirmed that SFJ and its leaders have actively and continuously advocated for the secession of Punjab from India, incited separatist groups along religious lines and sought to destabilize the Government of India. Their actions have targeted India's territorial integrity, incited individuals particularly from the Sikh community to undermine constitutional authority and promoted anti-national sentiments prejudicial to the country's security. SFJ has led and facilitated a secessionist movement and unlawful activities in Punjab and other Sikh-populated areas, while supporting militancy and incitement to violence to further its agenda of creating Khalistan.

xi. He further deposed that, despite being banned under the UAPA in 2019, SFJ has continued its unlawful activities through illicit channels, posing a significant threat to India's internal security, public order and territorial integrity. He stated that these activities fall under clauses (o) and (p) of sub-section (1) of Section 2 of the UAPA, 1967, as they involve anti-national and subversive actions aimed at disrupting India's sovereignty. SFJ's ties to militant outfits and support for extremism in Punjab and elsewhere demonstrate its intention to sever Punjab from India. He also stated on oath that if SFJ's unlawful activities are not curtailed, they could lead to the revival of militancy and terrorism in Punjab and other parts of India, escalating efforts to create Khalistan and destabilizing the government.

38. PW-16

i. **PW-16 Mr. Nidhin Lal**, Superintendent of Police, National Investigation Agency (NIA), tendered his affidavit **Exhibit-PW16/A** after due authorization by the Competent Authority. He deposed regarding RC bearing No. RC-40/2020/NIA/DLI, under Sections 120B, 124A, 153A and 153B of the Indian Penal Code, as well as Sections 13, 17, 18, 18B and 20 of the Unlawful Activities (Prevention) Act, 1967, registered by the NIA on 15.12.2020. The case is listed at Serial No. 4 (cases registered by National Investigation Agency) of Annexure II to the Reference Note/Background Note. The contents of affidavit are stated to be

based on record revealed during investigation as well as on his personal knowledge acquired during service as a Police Officer for a period of about one year in the National Investigation Agency as well as while working as an IRS officer for nine years. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

RC-40/2020/NIA/DLI

ii. PW-16 testified that the NIA investigation of RC-40/2020/NIA/DLI revealed that ‘Sikhs for Justice’ (SFJ) which is an Unlawful Association under the Unlawful Activities (Prevention) Act, 1967 has been collaborating with other Khalistani terrorist organizations, including Babbar Khalsa International, Khalistan Tiger Force and Khalistan Zindabad Force, along with their affiliated front organizations. These groups have conspired to create an environment of fear and lawlessness, with the aim of causing disaffection among the people and inciting them to rebel against the Government of India. As part of this conspiracy, significant funds were being raised abroad to support campaigns and propaganda against the Government of India. These efforts included staging demonstrations outside Indian Missions in countries such as the USA, UK, Canada and Germany. The operation was led by SFJ and designated terrorists, including Gurpatwant Singh Pannun, Paramjit Singh Pamma, Hardeep Singh Nijjar and others. The funds raised were funneled through Non-Governmental Organizations (NGOs) and directed to pro-Khalistan elements within India. These funds were then used to incite impressionable youth to carry out terrorist activities, aiming to instill fear among the people of India.

iii. He stated that the case is of a serious nature and investigation is still pending. The witness further relied upon true copy of the MHA Order dated 15.12.2020 along with RC-40/2020/NIA/DLI is **Exhibit-PW16/P1**.

iv. PW-16 deposed that the Sikh for Justice (SFJ), under the leadership of Gurpatwant Singh Pannun, has consistently called for the creation of a sovereign Khalistan within India’s territory. This campaign disregards India’s constitutional framework and encourages the Sikh community, especially the youth, to support separatist ideals, leading to multiple FIRs against SFJ and its leaders. He testified that SFJ, under Pannun’s leadership, has collaborated with fugitive Khalistani separatists, foreign nations and non-state actors hostile to India. Pannun has openly declared that SFJ’s primary objective is to secure Punjab’s separation from India through unlawful and terror-related activities.

v. The witness drawing from his professional experience as a police officer and his work with the NIA and IRS, corroborated the Ministry of Home Affairs’ conclusions regarding SFJ. He stated that the organization has been actively inciting separatist groups and destabilizing the Indian government by promoting anti-national and separatist sentiments. SFJ is also accused of supporting militancy and violence on religious lines, with the ultimate goal of creating Khalistan. PW-16 further stated that if SFJ’s unlawful activities are not curbed, they could lead to a resurgence of militancy and terrorism in Punjab and other parts of India, further destabilizing the Indian Government and threatening India’s territorial integrity.

39. PW-17

i. **PW-17 Raghvendra Vashistha**, Inspector of Police, I&O Division, National Investigation Agency (NIA), New Delhi tendered his affidavit **Exhibit-PW17/A** after due authorization by the Competent

Authority. He deposed as the Chief Investigating Officer of the RC-02/2019/NIA/DLI, registered under Sections 120B, 124A, 153A, 153B and 505 of the Indian Penal Code and Sections 13, 17 and 18 of the Unlawful Activities (Prevention) Act, 1967. This case is listed at Serial No.1 in Annexure II of the Reference/Background Note. The contents of affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 06 months of service as a Police Officer serving in the National Investigation Agency and six years of experience as a GST Inspector. The documents annexed to the affidavit are stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

RC-02/2019/NIA/DLI

ii. PW-17 testified that on 11th January 2019, the Ministry of Home Affairs (MHA) issued an order (No. 11011/72/2018/NIA) under the powers conferred by Section 6(5) read with Section 8 of the NIA Act, 2008, directing the National Investigation Agency (NIA) to register a Regular Case and take up the investigation based on credible information received by the Central Government, indicating the commission of offences under Sections 120B, 124A, 153A, 153B and 505 of the Indian Penal Code, as well as Sections 13, 17 and 18 of the Unlawful Activities (Prevention) Act, 1967, by members of the Sikhs for Justice (SFJ) organization. Consequently, on 15th January 2019, the NIA registered the case RC-02/2019/NIA/DLI, under Sections 120B, 124A, 153A, 153B and 505 of the Indian Penal Code and Sections 13, 17 and 18 of Unlawful Activities (Prevention) Act, 1967. The chargesheet has already been filed against 16 accused individuals, including Gurpatwant Singh Pannun, all of whom are absconding. Additionally, the accused Hardeep Singh Nijjar has since passed away.

iii. He deposed that credible information received by the Central Government indicated that certain entities and individuals based both in India and abroad, including Sikhs for Justice (SFJ), were involved in a conspiracy with other terrorist organizations and gangs. These groups had launched a campaign under the banner of "Punjab Referendum 2020 for Khalistan," seeking to raise funds and engage in secessionist activities both on the ground and via social media. The aim was to provoke members of the Sikh community to agitate for the separation of Punjab from the Union of India.

iv. The witness also deposed that the investigation revealed that SFJ actively encouraged Sikh communities worldwide to support the creation of Khalistan through campaigns like "Punjab Referendum 2020," thus challenging the sovereignty of India. SFJ entered into a criminal conspiracy with terrorist organizations and gangs, executing secessionist activities designed to destabilize India. These activities included violent protests, incitement to terrorism and collaboration with banned terrorist groups. SFJ leaders, particularly Gurpatwant Singh Pannun, extensively used social media platforms and on-ground campaigns to spread anti-India rhetoric, incite communal violence and foster disaffection among Sikhs. Their goal was to radicalize the youth and create unrest, especially in Punjab. SFJ leaders also openly called for mutiny within India's security forces, urging Sikh soldiers to abandon the Indian Army. Further investigation revealed that SFJ had solicited support from foreign countries, particularly Pakistan, which was seen as backing the organization's destabilizing efforts in India. SFJ also sought to gain international legitimacy for its cause by

involving international bodies like the United Nations. To fund its Khalistan campaign, SFJ raised money internationally using platforms like PayPal.

v. He further stated on oath that during the course of the investigation, several videos and photographs of Gurpatwant Singh Pannun, the Chief of Sikhs for Justice (SFJ), were downloaded from open sources such as YouTube in the presence of independent witnesses for use as evidence. It was found that SFJ functioned primarily as a front organization for terrorist groups whose leaders were closely affiliated with SFJ. Notably, Canada-based Hardeep Singh Nijjar of Khalistan Tiger Force and UK-based Paramjeet Singh Pamma of Babbar Khalsa International were regularly involved in SFJ's propaganda events in various countries, often sharing platforms with Gurpatwant Singh Pannun and inciting Sikhs against the Government of India.

vi. Further investigation revealed that SFJ activists had conspired to radicalize the people of Punjab, providing funds to support criminal activities and to propagate the "Referendum 2020" movement. Statements from several witnesses, whose testimonies were recorded, confirmed this narrative. The investigation highlighted a clear criminal conspiracy, with each accused individual—namely Gurpatwant Singh Pannun, Avtar Singh Pannun, Gurpreet Singh Baagi, Harpreet Singh @ Rana Singh, Paramjit Singh @ Pamma, Sarabjit Singh Bannur, Amardeep Singh Purewal @ Amardeep Singh Khalsa, J S Dhaliwal, Kulwant Singh Mothada, Dupinderjit Singh @ Dupinder, Hardeep Singh Nijjar, Kulwant Singh @ Kanta @ Mann Singh Khalsa, Harjaap Singh @ Japhi Singh, Sarabjit Singh @ Sabi Singh, Jatinder Singh Grewal and S Himmat Singh Singh—being actively involved in tweeting, re-tweeting, hash tagging and posting videos, tweets, comments and audio messages across various social media platforms to gain traction for their cause. Additionally, these individuals were frequently present at rallies, agitations, protests and demonstrations, where they made speeches promoting the cause of Khalistan through the "Referendum 2020" campaign.

vii. PW-17 further deposed that the investigation revealed that SFJ and Gurpatwant Singh Pannun, along with all the other accused, have been actively inciting the Sikh youth of Punjab and disrespecting the Indian National Flag through various speeches, texts, posts and videos. On 9th January 2019, Gurpatwant Singh Pannun tweeted: "*Hindus from UP Bihar are asked to go back. Only Sikhs, Hindus, Muslims and Christians living in Punjab since 1900 will be eligible to vote in #SikhReferendum2020.*" Furthermore, Avtar Singh Pannun was recorded using abusive language against the Indian Tricolor and even burning the flag in a video, an act intended to stir disaffection among communities and spread terror.

viii. Elaborating further, the witness deposed that in another instance, Gurpatwant Singh Pannun was seen in a video burning the Indian Tricolor, accusing the flag of being responsible for the genocide of Sikhs. A subsequent video showed the burnt remains of the Indian National Flag being sent to the Indian High Commission in Canada. Additionally, a video clip displayed photographs of Kashmiri militants, who were referred to as "freedom fighters." Through this video, SFJ urged both Kashmiri militants and Sikh soldiers to support voter registration for the "Referendum 2020." Another video featured SFJ activists, including Sabi Singh, Sarabjit Singh Banur and Sukhwinder Singh Thana, with five other individuals, three of whom were standing on top of the Indian National Flag. In this video, Sabi Singh claimed that the Indian Tricolor was responsible for the rape of Sikh women and the deaths of countless Sikh youth, urging all Sikhs to burn the flag and support the "Referendum 2020" campaign for Khalistan. In his testimony, PW-17 relied upon several

documents. **Exhibit-PW17/P-1** is the true copy of FIR No. 02/2019/NIA/DLI along with MHA Order No. 11011/72/2018/NIA. **Exhibit-PW17/P-2** is a copy of the videos downloaded from open sources, contained in a single pen drive. **Exhibit-PW17/P-3 (Colly)** is the true copy of the statements of 25 witnesses recorded under Section 161 Cr.P.C. **Exhibit-PW17/P-4** is the true copy of the videos recovered on 23.01.2019. **Exhibit-PW17/P-5** is the true copy of the recovery memo dated 23.01.2019. **Exhibit-PW17/P-6** is the true copy of the scrutiny report for the video recovered on 23.01.2019. **Exhibit-PW17/P-7** is the true copy of the videos recovered on 13.08.2020. **Exhibit-PW17/P-8** is the true copy of the recovery memo dated 13.08.2020. **Exhibit-PW17/P-9** is the true copy of the scrutiny report for the data recovered on 13.08.2020.

ix. PW-17 further deposed that a chargesheet was filed on 9th December 2020 before the NIA Special Court, New Delhi, in RC-02/2019/NIA/DLI. The chargesheet named 16 accused persons, including the designated terrorist Gurpatwant Singh Pannun, who is the Head of the SFJ. The accused listed in the chargesheet are: Gurpatwant Singh Pannun, Avtar Singh Pannun, Gurpreet Singh Baagi, Harpreet Singh @ Rana Singh, Paramjit Singh @ Pamma, Sarabjit Singh Bannur, Amardeep Singh Purewal @ Amardeep Singh Khalsa, J S Dhaliwal, Kulwant Singh Mothada, Dupinderjit Singh @ Dupinder, Hardeep Singh Nijjar, Kulwant Singh @ Kanta @ Mann Singh Khalsa, Harjaap Singh @ Japhi Singh, Sarabjit Singh @ Sabi Singh, Jatinder Singh Grewal and S Himmat Singh. The charges were framed under various sections of the Indian Penal Code, the Unlawful Activities (Prevention) Act, 1967 and the Prevention of Insults to National Honour Act, 1971. True Copy of the Chargesheet dated 09.12.2020 is **Exhibit-PW17/P-10**.

x. He further deposed that since all 16 accused individuals are absconding, non-bailable warrants (NBWs) were issued by the concerned Court of Additional Sessions Judge, New Delhi District, Patiala House Court, New Delhi on 17th March 2021. The NIA team visited the respective addresses of 14 accused persons to execute the NBWs; however, none of the accused were found at their addresses. Additionally, two of the accused, namely Amardeep Singh Purewal @ Amardeep Singh Khalsa and Jatinder Singh Grewal, did not have residential addresses in India. As a result, the NBWs could not be executed against the 16 accused in the present case. On 8th September 2021, the concerned NIA Special Court, New Delhi District, Patiala House Court, New Delhi, issued a Proclamation under Section 82 of the Criminal Procedure Code (Cr.P.C.). However, due to an inadvertent error in reflecting the relevant offences, a fresh proclamation under Section 82 Cr.P.C. was issued on 22nd January 2022. Copy of the NBWs issued against the accused are **Exhibit-PW17/P-11 (colly)**. True copy of Proclamation u/s 82 Cr.P.C. dated 08.09.2021 against the respective accused is collectively **Exhibit-PW17/P-12**. A true copy of the Proclamation dated 22nd January 2022 against the respective accused is collectively **Exhibit-PW17/P-13**. Subsequently, separate orders were issued under Section 83 Cr.P.C. for attaching the properties of accused individuals, namely Hardeep Singh Nijjar, Kulwant Singh Mothada, Avtar Singh Pannun, Sarabjit Singh Bannur and Gurpreet Singh Baagi. Additionally, an order under Section 83 Cr.P.C. was also passed for attaching the property of Gurpatwant Singh Pannun. Copy of orders under Section 83 Cr.P.C. is collectively **Exhibit-PW17/P-14**. Copy of the execution reports attaching the properties of the accused, namely, Gurpatwant Singh Pannun, Hardeep Singh Nijjar, Kulwant Singh Mothada, Avtar Singh Pannun, Sarabjit Singh Bannur and Gurpreet Singh Baagi is collectively **Exhibit-PW17/PW-15**. Copy of the intimation dated 13.01.2021 sent by the MHA to the Joint

Secretary CTCR North Block, MHA, New Delhi regarding the attachment of immovable property under Section 51A UAPA in the present RC is **Exhibit-PW17/PW-16**.

xi. PW-17 testified that based on his knowledge acquired during the course of his service as a Police Officer, corroborated by material available in the public domain and on social media, as well as the information derived from the records of the FIR mentioned above, he fully concurs with the conclusions drawn by the Ministry of Home Affairs and the Central Government. He deposed further that he firmly agreed that Sikhs for Justice (SFJ) is involved in anti-national and subversive activities, particularly in Punjab and other regions, with the intent to disrupt the sovereignty and territorial integrity of India.

40. PW-18

i. **PW-18 Ms. Preetinder Kaur Virk**, Deputy Superintendent of Police, National Investigation Agency (NIA), Branch Office, Chandigarh, tendered her affidavit **Exhibit-PW-18/A**, after due authorization by the Competent Authority. She deposed that she is the Chief Investigating Officer of RC-19/2020/NIA/DLI dated 05.04.2020, registered at the National Investigation Agency, Branch Office, Chandigarh, mentioned at Serial No. 2 (cases registered by NIA) of the Background Note. The contents of the affidavit are stated to be based on the record revealed during the investigation and on her personal knowledge acquired during six years of government service since November 2017. The documents annexed to the affidavit were verified as true copies of the respective originals and were marked as exhibits during the deposition.

RC-19/2020/NIA/DLI registered at NIA Office, New Delhi

ii. PW-18 deposed that RC-19/2020/NIA/DLI dated 05.04.2020 registered at NIA Office, New Delhi pertains to propagation of secessionist 'Khalistan Referendum 2020' movement by affixing posters and banners of 'Khalistan Zindabad and Referendum 2020', procurement of weapons, setting fire to business installations, efforts for arms training in Pakistan and acts of violence in Punjab and various other parts of India. She further stated that on 19.10.2018, Amritsar Police apprehended Sukhraj Singh @ Raju and Malkeet Singh @ Meetu on the spot i.e. KotMit Singh flyover, Amritsar while they were hanging 'KHALISTAN ZINDABAD' and 'KHALISTAN REFERENDUM 2020' cloth banners at Pillars of KotMit Singh flyover, Amritsar and a case was registered at Police station Sultanwind, Amritsar (City) vide FIR No.152 dated 19.10.2018 U/s 124A, 153-A, 153-B and 120-B of Indian Penal Code against both the arrested accused and others. Copy of the FIR No. 152 dated 19.10.2018 of PS Sultanwind, Amritsar, with English translation is **Exhibit PW-18/P1**.

iii. She further deposed that during investigation, other accused namely Bikramjit Singh @ Vicky, Manjeet Singh @ Manjit Singh @ Manga, Jatinder Singh @ Goldy, Harpreet Singh @ Happy, Gurwinder Singh @ Gurpreet Gopi, Harmeet Singh @ Raju, Roofel @ Rufal @ Rahul Gill, Sukhmander Singh @ Gopi and Kuldeep Singh @ Kuldeep Singh @ Keepa were arrested by Punjab Police. Investigation established that they received funds from abroad sent by members of 'Sikhs for Justice' and the same were used for furthering terror activities and other preparatory acts i.e. attempts to procure weapons for terror activities in India and to get arms training in Pakistan.

iv. Thereafter, pursuant to the investigation carried out by the Punjab Police, a Charge Sheet under Sections 117, 112, 124-A, 153-A, 153-B, 120-B of IPC, Section 17, 18, 19 of UA(P) Act and Section 25 of Arms Act was initially filed. The same was followed by first Supplementary chargesheet dated 03.07.2019 under Sections 117, 122, 124-A, 153-A, 153-B, 120-B of IPC, Section 17, 18, 19 of UA(P) Act and Section 25 of Arms Act; Second Supplementary chargesheet dated 17.08.2019 under Sections 117, 122, 124-A, 153-A, 153-B, 120-B of IPC, Section 17, 18, 19 of UA(P) Act and Section 25 of Arms Act. The said chargesheets were filed before the concerned District Court, Amritsar in FIR No.152 dated 19.10.2018 against eleven accused. Copy of the Charge Sheet dated 28.03.2019 is **Exhibit PW-18/P2**. The first Supplementary Charge sheet dated 03.07.2019 is **Exhibit PW-18/P3**. The second Supplementary Charge sheet dated 17.08.2019 is **Exhibit PW-18/P4**. The exhibits are accompanied with English translations.

v. She further testified that on 05.04.2020, NIA registered a case being RC-19/2020/NIA/DLI under Sections 120B, 124A, 153A and 153B of the Indian Penal Code and Sections 17, 18 and 19 of the Unlawful Activities (Prevention) Act, 1967. NIA further arrested Pargat Singh on 22.06.2020 for his role in the instant case. The Copy of the RC-19/2020/NIA/DLI along with MHA order No.11011/30/2020/NIA is **Exhibit PW-18/P5**. Copy of the arrest memo of Pargat Singh dated 22.06.2020 is **Exhibit PW-18/P6**.

vi. She deposed that during the course of investigation, various videos and photographs of Gurpatwant Singh Pannun, Chief of SFJ were downloaded from open source i.e. YouTube etc. in presence of independent witnesses for the purpose of evidence and it has been noticed that the SFJ is nothing more than a front organization for the terrorist groups whose leaders are affiliated and closely associated with the SFJ. Canada-based Hardeep Singh Nijjar of Khalistan Tiger Force and UK-based Paramjeet Singh Pamma of Babbar Khalsa International were closely associated with SFJ's propaganda events in different countries and routinely shared a forum with Gurpatwant Singh Pannun inciting the Sikhs against the Government of India. Copy of the Recovery Memo of the downloaded YouTube videos including screenshots is **Exhibit PW-18/P7**.

vii. PW-18 stated that investigation revealed that the twelve arrested accused of the instant case voluntarily became members of the terrorist gang formed by Nihal Singh @ Fateh Singh, proxy of Gurpatwant Singh Pannun for the propagation of secessionist movement "Punjab Referendum 2020" of pro-Khalistan association "Sikhs for Justice" (SFJ). Gurpatwant Singh Pannun and others, used Facebook Pages e.g. Sada Punjab, Khalistan Zindabad and many YouTube channels containing Khalistan propaganda material to recruit Sikh youths, particularly of Punjab State, to further use them to carry out unlawful acts in different parts of Punjab and Delhi, to threaten the unity, integrity and security of India by way of pasting posters of "Referendum 2020" in different parts of Punjab, damaging property (liquor shops) and target people of other communities in the name of revenge for sacrilege of Guru Granth Sahib. Disclosure statements of the arrested accused have revealed about their recruitment by SFJ's members via Facebook, further attempts at recruitment of other Sikh youths for unlawful activities. A copy of the disclosure statements of the accused is **collectively Exhibit PW-18/P8**.

viii. She further testified that the the arrested accused disclosed that they were in direct contact with Nihal Singh @ Fatih Singh, proxy of Gurpatwant Singh Pannun and were propagating/storing secessionist Khalistan

content on their mobile phones. They were setting fire to liquor shops, pasting posters of Khalistan at public places in India and sharing photographs/videos from their mobile phones to their foreign handlers. Two accused were arrested with cloth banners of Khalistan slogans and one accused was in possession of a pistol. Copy of seizure memos of mobile phones, cloth banners and pistol pertaining to the accused along with English translation thereof, is **collectively Exhibit PW-18/P9**.

ix. Further, scrutiny of the extracted data of the seized mobile phones of the arrested accused revealed their association with each other as well as many foreign handlers and their conspiratorial activities. Accused Manjit Singh's mobile data revealed that he was acting as an admin of a WhatsApp group namely "Khalistan Referendum 2020" and circulating radicalized contents on social media. Accused Harmeet Singh @ Raju's extracted data revealed details of money received in lieu of SFJ's activities in the form of text messages/receipts. Accused Roofel @ Rahul Gill, from whom a pistol was seized, had pictures/videos of weapons and gangsters, manifesting his violent sentiments, while extracted data of accused Sukhmander Singh's mobile phone revealed chats with other local gangsters. Copy of scrutiny report of the extracted data from mobile phones is **Exhibit PW-18/P10**.

x. She stated that the investigation revealed that the accused in the instant case performed different tasks assigned to them in lieu of funds sent by SFJ proxies from foreign countries such as South Africa, UAE, Australia etc. Accused Sukhraj Singh, Manjit Singh, Harmeet Singh, Kuldeep Singh and Pargat Singh received funds from various entities through non-banking modes i.e. MTSS (Money Transfer Service Scheme) channels and even into their bank accounts. In some instances, the accused received money sent by Pakistan Nationals from UAE through Indian Nationals based in UAE. Copies of payments received in bank accounts and through MTSS channels, along with Section 65B certificates are **collectively Exhibit PW-18/P11**.

xi. She deposed that it was revealed during the course of investigation that accused Manjit Singh @ Manga, Bikramjeet Singh @ Vicky, Gurwinder Singh @ Gopi and Harpreet Singh @ Happy were making attempts to procure weapons for targeting other communities in the name of avenging the sacrilege of Guru Granth Sahib. For this purpose, accused Bikramjeet Singh @ Vicky, Gurwinder Singh @ Gopi and Harpreet Singh @ Happy visited Srinagar, Jammu & Kashmir in the year 2018 and made concerted efforts to procure a pistol. Call data records and tower locations of the accused reflect their locations in Srinagar during said visit. Moreover, accused Bikramjeet Singh @ Vicky and Kuldeep Singh visited different cities in Punjab to paste secessionist banners of Khalistan slogans. Their common locations were verified by their tower locations and copies of technical reports are **collectively Exhibit PW-18/P12**.

xii. She stated that perusal of statements of several witnesses recorded under section 161 and 164 of the Cr.P.C. reveals that members of SFJ have been recruiting Sikh youths through social media and instigating them to carry out illegal activities against the Government of India. Statements also reveal attempts by the arrested accused for further recruitment in their gang and seeking assistance for carrying out unlawful tasks assigned by the foreign handlers. The statements of the protected witnesses (*in terms of Section 44 of the UAPA*) code named as X-1, X-2, X-3, X-4, X-5, X-6, X-7, X-8 and X-12 for the perusal of this Tribunal are **Exhibit PW-18/P13 contained in a sealed cover**. The documents referred as **Exhibit PW-18/P13** along

with other two set of documents which are subsequently exhibited as **Exhibit PW-18/P14 & Exhibit PW-18/P18** were taken out from the sealed cover and after perusal were directed to be re-sealed by the Registrar with the seal of the Tribunal).

xiii. PW-18 also deposed that during investigation, supporters of SFJ have attempted to threaten NIA officials engaged in the investigation, via twitter handles. SFJ operatives Jaspreet Singh (twitter handle @jassingh199) and Mahajeet Singh (twitter handle @mahajeetsingh02) posted one tweet on the social media platform Twitter with content “GO BACK TO YOUR FAMILIES SAVE YOURSELF”. When the IP addresses were resolved, they were found to have originated in Pakistan. The cyber tracking report of these twitter handles is **Exhibit PW-18/P14** (in sealed cover).

xiv. She deposed that further, in response to the investigation being done in the instant case, Gurpatwant Singh Pannun released a letter dated 25.06.2019 written by him to Mr. Michael Pompeo, the then US Secretary of State, with the subject “Report on Torture of Khalistan Referendum 2020 campaigners and criminalization of pro-Khalistan political opinion by Government of India”. In this letter, Pannun admitted that arrested accused Sukhraj Singh, Malkeet Singh, Bikramjeet Singh, Manjit Singh, Gurwinder Singh, Harpreet Singh and Kuldeep Singh were SFJ’s campaigners in India. Copy of the letter is **Exhibit PW-18/P15**.

xv. She testified that pursuant to the investigation carried out by the NIA, third Supplementary Charge Sheet dated 18.12.2020 was filed before NIA Special Court, S.A.S. Nagar (Mohali) in RC-19/2020/NIA/DLI against 10 accused, including designated terrorist Gurpatwant Singh Pannun, who is the Head of SFJ and is an absconder.. Copy of the third Supplementary Charge Sheet dated 18.12.2020 is **Exhibit PW-18/P16**.

xvi. She further stated that based on the evidence that came on record, 4th Supplementary Charge-Sheet was filed on 10.04.2023 regarding the funds received by arrested accused in lieu of carrying out SFJ’s activities in India from two Pakistan Nationals. The evidence strengthened the fact that SFJ has active linkages in Pakistan and together they have forged a nexus to undermine the territorial integrity and sovereignty of India. The Pak nationals transferred the funds through UAE-based Indian nationals, whose statements have been recorded, along with certificate u/s 65-B Evidence Act and Section 2A Bankers Book Evidence Act with respect to the funds received by accused Manjit Singh from abroad in his bank account. A Copy of the 4th Supplementary Charge sheet dated 10.04.2023 is **Exhibit PW-18/P17**. A copy of the protected statements recorded u/s 161 Cr.P.C. of two Indian Nationals X-15 and X-16, along with transaction details, is collectively **Exhibit PW-18/P18** (in a sealed cover).

xvii. She deposed that the charge has been framed against twelve accused for commission of offences under Sections 120B, 117, 124-A, 436 of the Indian Penal Code, Section 25 of the Arms Act and Sections 13, 16, 17, 18, 19, 20 of the Unlawful Activities (Prevention) Act, 1967 on 09.12.2021. Copy of Charge dated 09.12.2021 framed by Ld. Special Judge, NIA, S.A.S. Nagar (Mohali) is **Exhibit PW-18/P19**. Property Confiscating Order dated 14.09.2023 by Special Judge, NIA, Punjab passed in RC No.19/2020 whereby the properties in the name of Gurpatwant Singh Pannun were directed to be confiscated was also produced and is **Exhibit PW-18/P20**. The trial *qua* 12 accused (11 in judicial custody and 01 on bail) is stated to be still underway.

xviii. PW-18 deposed that the aforesaid RC has been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was extended by Ministry of Home Affairs vide notification dated 08.07.2024 are continuously indulging in cession and secessionist activities in a clandestine manner and as such she was of the view that if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

41. PW-19

i. PW-19 Simranjit Singh Lang (P.P.S.), Deputy Superintendent of Police, State Cyber Division, Punjab, tendered his affidavit Exhibit PW-19/A, after due authorization by the Competent Authority. He deposed as the Supervisory Officer of FIR No. 12/2020, FIR No. 34/2021, FIR No. 24/2022, and FIR No. 27/2022, mentioned at Serial Nos. 17, 23, 28, and 30 of the background note. He also clarified that the Police Station concerned with FIR No. 12/2020 at Serial No. 17 in the background note is reflected as PS: SSOC Mohali (State Special Operation Cell), which should correctly read as PS: Punjab State Cyber Crime. Similarly, the Police Station concerned with FIR No. 34/2021 at Serial No. 23 in the background note is reflected as PS: SSOC Mohali, which should also correctly read as PS: Punjab State Cyber Crime. The contents of the affidavit are based on the records revealed during the investigation and on his personal knowledge acquired during eight years of service as a police officer since 2016. The documents annexed to the affidavit were verified as true copies of the respective originals and were marked as exhibits during the deposition.

FIR No. 12/2020, PS: Punjab State Cyber Crime, SAS Nagar, Punjab

ii. PW-19 deposed that FIR No. 12/2020 dated 12.04.2020 under sections 10 and 13 UAPA, Section 49 of Punjab Police Act, 2007 and Section 120-B , 134A IPC was registered at PS: Punjab State Cyber Crime, SAS Nagar, Punjab on receiving a secret information from a source that Gurpatwant Singh Pannun of Sikhs for Justice (SFJ), New York, USA is actively pursuing his secessionist and anti national agenda through social media in difficult times of global COVID-19 pandemic. His activities are also exploiting the social media to create the disaffection amongst the Punjab Police Force. The case was registered against Gurpatwant Singh Pannun.

iii. He further deposed that during investigation, the concerned videos were downloaded on a CD make Writex from social media and taken into possession on 23.10.2024. He also stated that procedure of the Mutual Legal Assistance Treaty ("MLAT") was initiated between India and USA with reference to the concerned facebook accounts.

iv. The case is stated to be still under investigation with chargesheet to be presented after receiving the information through the process of MLAT. True copy of the FIR is **Exhibit PW-19/P1**; True typed copy of the seizure memo of CD make Writex is **Exhibit PW-19/P2**; True copy of the URL of the concerned Facebook account used for dissemination of the messages in FIR No.12 of 2020 is **Exhibit PW-19/P3**; True copy of the screenshots of concerned Facebook account is **Exhibit PW-19/P4** and True copy of video clipping (in a CD) along with its transcript is **Exhibit PW-19/P5**.

FIR No. 34/2021 ,PS: Punjab State Cyber Crime, SAS Nagar, Punjab

v. PW-19 testified that in FIR No. 34/2021 dated 30.08.2021 under Section 10 , 13 UAPA , Section 124A, 153 and 153-A IPC registered at PS: Punjab State Cyber Crime, SAS Nagar, Punjab, an information was received through social media that Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), New York, USA posted a video on his Facebook page namely “Khalistan Zindabaad Faridkot” in which he was promoting the violent action and assassination of Captain Amarinder Singh, CM Punjab. He stated that in the said video clip, Gurpatwant Singh Pannun is shown targeting the poster of Captain Amarinder Singh, the then CM of Punjab withbullets.

vi. He further testified that during investigation, the concerned videos were downloaded on a CD make Writex from social media and taken into possession on 22.10.2024. Further, procedure of the Mutual Legal Assistance Treaty (“MLAT”) was initiated between India and USA with reference to the concerned facebook accounts. The case is stated to be still under investigation and chargesheet to be presented after receiving the information through the process of MLAT. True Copy of FIR is **Exhibit PW-19/P6**; True typed copy of the seizure memo of CD make Writex is **Exhibit PW-19/P7**; True copy of the URL of the concerned Facebook account and Website used for dissemination of the messages in FIR No. 34 of 2021 is **Exhibit PW-19/P8**; True copy of the screenshots of concerned Facebook account and website in FIR No. 34 of 2021 is **Exhibit PW-19/P9** and true copy of video clipping (on a CD) along with its transcript is **Exhibit PW-19/P10**.

FIR No.24/2022 ,PS: Punjab State Cyber Crime, SAS Nagar, Punjab

vii. PW-19 deposed that FIR No.24/2022 dated 02.05.2022 under Sections 124-A, 153, 153-A, 153B, 505(1), 506, 120-B IPC and Section 10,13 UAPA was registered at PS: Punjab State Cyber Crime, SAS Nagar, Punjab on the basis of report of Inspector Vikas Abrol, Incharge of Social Media Monitoring Cell. He stated that the FIR stands registered against Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), New York, USA since a video was posted on a YouTube channel named ‘US MEDIA INTERNATIONAL’ by Sikhs for Justice (SFJ). In the said video, Gurpatwant Singh Pannun, General Counsel of SFJ has been found promoting violent action against government of Punjab and also against the children of police personnel. Further, during investigation, the concerned video was downloaded on a CD make ‘hp’ from social media and taken into possession on 22.10.2024.

viii. The case is stated to be still under investigation and chargesheet is yet to be presented. True copy of FIR is **Exhibit PW-19/P11**; True typed copy of seizure memo of CD make HP wherein the video was downloaded from social media and prepared is **Exhibit PW-19/P12**; True copy of the URL of the concerned Facebook account and Website used for dissemination of the messages in FIR No.24 of 2022 is **Exhibit PW-19/P13** and True copy of video clipping (on a CD) along with its transcript is **Exhibit PW-19/P14**.

FIR No. 27/2022 ,PS: State Cyber Crime, SAS Nagar (SAS Nagar (Mohali)), SAS Nagar, Punjab

ix. PW-19 deposed that FIR No. 27/2022 dated 04.06.2022 under sections 131, 132, 135, 153, 153A, 153B, 505(1) and 506 IPC was registered at PS: State Cyber Crime, SAS Nagar (SAS Nagar (Mohali)), SAS Nagar, Punjab on the basis of a report by Inspector Vikas Abrol, Incharge, Social Media Monitoring Cell that Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), New York, USA gave a call to the Sikh soldiers through social media to stop defending Indian Borders and to gather at Sri Akal Takht Sahib to join “Khalistan Referendum”.

x. He further deposed that during investigation, alleged content was preserved through X1 Social Discovery Tool and procedure of MLAT has been initiated between India and USA about the concerned Facebook accounts and the chargesheet will be presented after receiving the information through MLAT. True copy of FIR is **Exhibit PW-19/P15**; True copy of the URL of the concerned YouTube account and Website used for dissemination of the messages in FIR No. 27 of 2022 is **Exhibit PW-19/P16**; True copy of the screenshots of concerned YouTube channel in FIR No. 12 of 2020 is **Exhibit PW-19/P17** and True copy of video clipping (on a CD) along with its transcript is **Exhibit PW-19/P18**.

xi. Witness deposed that the aforesaid FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was imposed by Ministry of Home Affairs, are continuously indulging in secession and secessionist activities in a clandestine manner and as such he was of the view that if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

42. PW-20

i. **PW-20 Sourabh Bhardwaj**, Deputy Superintendent of Police, National Investigation Agency (NIA), New Delhi, tendered his affidavit **Exhibit-PW-20/A**, after due authorization by the Competent Authority. He deposed that he is the Chief Investigating Officer of RCs bearing No. RC-30/2020/NIA/DLI, RC-35/2021/NIA/DLI, and RC-22/2022/NIA/DLI, mentioned at Serial Nos. 3, 6, and 7, respectively, of Annexure II to the Reference/Background Note. The contents of the affidavit are stated to be based on records revealed during the investigation and on his personal knowledge acquired during 8 years of service as a Police Officer since December 2016. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

RC-30/2020/NIA/DLI

ii. PW-20 deposed that on 4th September 2020, the Ministry of Home Affairs (MHA) issued an order under F.No.11011/57/2020/NIA, authorizing the National Investigation Agency (NIA) to take over the investigation of an incident that occurred on 14th August 2020 at the Deputy Commissioner Office in Moga, Punjab. He further deposed that on 14th August 2020, two miscreants entered the Administrative Complex at the DC Office in Moga around 08:00 hrs. They went to the top floor of the building, where they hoisted a

saffron/yellowish flag with "KHALISTAN" written on it, fixing it to an iron pole. After a few minutes, they descended to the ground floor, approached the Indian National Flag hoisted on the premises, and cut the rope holding it. As a result, the Indian National Flag fell, and the miscreants dragged it through the rope towards the outer gate of the complex. The Punjab Police registered FIR No. 0136/2020 at Police Station City Moga, under Sections 121,121-A,124-A, 153-A, 153-B IPC and Section 2 of Prevention of Insults to National Honours Act, 1971 at Police Station: City Moga, Punjab. Sections 109, 115, 212 of IPC, Sections 10, 11 &13 of the Unlawful Activities (Prevention) Act, 1967 and Section 66F of IT Act were added subsequently by the Punjab Police.

iii. He deposed that on 5th September 2020, the NIA re-registered the case as RC-30/2020/NIA/DLI under Sections 121, 121A, 124A, 153A, and 153B of the Indian Penal Code, along with Section 2 of the Prevention of Insults to National Honours Act, 1972. The case was registered against the following accused individuals: Gurpatwant Singh Pannu, son of Mohinder Singh, residing at House No. 2033, Sector 15-C, Chandigarh, currently living in the United States of America; Jaspal Singh, son of Chamkor Singh, a resident of Village Roli, District Moga, Punjab; Inderjeet Singh, son of Jugraj Singh, a resident of Village Roli, District Moga, Punjab; Aakashdeep, son of Charat Singh, a resident of Village Sadhuwala, District Ferozpur, Punjab. Copy of RC-30/2020/NIA/DLI dated 05.09.2020 along with MHA order F.No. 11011/57/2020/NIA and FIR No.0136/2020 Police Station City Moga, Punjab, are **collectively Exhibit PW-20/P1**.

iv. He testified that the investigation revealed that the accused had conspired to wage war against the Government of India, collaborating with the leaders and cadres of Sikhs for Justice (SFJ). The conspiracy involved circulating a recorded video of the incident across various social media platforms. The accused were found to be inciting youth, particularly radical Sikhs, to hoist the Khalistan flag and share the video with the intent to provoke disaffection towards the Government of India and encourage actions detrimental to maintaining harmony between different religious communities.

v. Further investigation uncovered that 'Sikhs for Justice' (SFJ), a Sikh Jathebandi founded in 2007, was actively working towards establishing an independent Khalistan through the 'Khalistan Referendum 2020'. SFJ advocates for the secession of Punjab from India using both violent and non-violent means. This US-based secessionist group is led by Gurpatwant Singh Pannun and has numerous other active members. The Government of India declared SFJ an unlawful and proscribed organization on 10th July 2019 and Additionally, on 1st July 2020, the Union of India declared Gurpatwant Singh Pannun an "*individual terrorist*" under the UA(P) Act for promoting secessionism and allegedly encouraging Punjabi Sikh youths to take up arms.

vi. Witness further deposed that following the investigation conducted by the NIA, Charge Sheet was filed before the concerned NIA Special Court in Mohali, Punjab, against six accused including Gurpatwant Singh Pannun, the leader of the unlawful association 'Sikhs for Justice,' and Rana Singh @ Harpreet Singh, a member of Sikhs for Justice, as absconders and also included other arrested accused who were members of Sikhs for Justice, namely Inderjit Singh @ Inderjeet Singh @ Inderjit Singh Gill, Jaspal Singh @ Ampa, Akashdeep Singh @ Munna, and Jagwinder Singh @ Jagga, who were involved in hoisting the Khalistan flag at the Deputy Commissioner Office in Moga and insulting the National Flag. He further stated that the case

continued to be investigated under Section 173(8) of the Cr.P.C. Copy of the Charge Sheet is **Exhibit PW-20/P2**.

vii. He deposed that during the course of the investigation, it was revealed that Gurpatwant Singh @ Pannun and Rana Singh @ Harpreet Singh, both members of Sikhs for Justice (SFJ), played a key role in the flag hoisting incident at the Deputy Commissioner Office in Moga, along with other arrested individuals. Several premises belonging to the accused and their associates were searched, and incriminating documents were seized. Additional related documents and materials were also seized during the investigation process. The incriminating material that had been initially seized by the Punjab Police was handed over to the NIA during the transfer of the case. Copy of the seizure list and production/seizure memo is **collectively Exhibit PW-20/P3**.

viii. Further, the investigation revealed that Gurpatwant Singh Pannun and Harpreet Singh @ Rana Singh, both members of the unlawful association Sikhs for Justice (SFJ), were propagating the ideology of secession from India with the objective of establishing an independent Khalistan through "Khalistan Referendum 2020." They actively promoted this ideology through various media platforms, including SFJ and the US Media International Channel. They encouraged youth to join SFJ by participating in the referendum and further propagate the secessionist agenda.

ix. He testified that the investigation uncovered that Gurpatwant Singh Pannun and Harpreet Singh @ Rana Singh had conspired with Inderjit Singh, Jaspal Singh, Akashdeep Singh, and Jagwinder Singh—to hoist the Khalistani flag at government buildings and dishonor the Indian National Flag. As a result, the Khalistani flag was hoisted at the DC Office Complex in Moga, Punjab, and the Indian National Flag was torn down.

x. He further deposed that it was revealed that Jagwinder Singh was radicalized by a video on social media wherein accused Gurpatwant Singh Pannun announced to the people of Punjab and Haryana, that Haryana was a part of Punjab and after Khalistan, Haryana will become a part of Khalistan. Further, Gurpatwant Singh Pannun offered a prize of \$2500 to anyone who hoisted the Khalistani flag at any government building or Panchayat Houses in Punjab and Haryana on 15 August. Gurpatwant Singh Pannun incited the people of Punjab and Haryana to replace the Indian National Flag with the Khalistani flag.

xi. He further stated that Inderjit Singh, the cousin of Jagwinder Singh, visited his house on 02.08.2020 and motivated him to watch SFJ videos. Inderjit Singh and Jaspal Singh, who lived in the same village, were influenced by these videos. On 7th/8th August 2020, Inderjit Singh sent the videos to Jaspal Singh, and both motivated Akashdeep Singh, cousin of Jaspal Singh to watch them as well. On 14 August 2020, Inderjit Singh, Jaspal Singh, and Akashdeep Singh hoisted the Khalistani flag at the DC Office Moga.

xii. He further deposed that during the course of investigation, a video was recovered from the mobile phone of accused Jaspal Singh, which featured graphics stating, "*Khalistan Flag raised at Session Court Moga*." The video contained footage of the Khalistan flag being hoisted by Inderjit Singh and Jaspal Singh at the DC Office, which was videographed by Akashdeep Singh. The video was a combination of two separate clips, which were also retrieved from the mobile data of Inderjit Singh. Additionally, videos related to Gurpatwant Singh Pannun, SFJ, and US Media International were found in the search history and phones of

the accused. A copy of the video recovered from the accused (in a pen drive) is **Exhibit PW-20/P4**. Transcription of the videos retrieved from the phones of Accused Inderjit Singh and Jaspal Singh are **Exhibit PW-20/P5**. Also, the explanation memorandum by the accused Inderjit Singh, Jaspal Singh, Akashdeep Singh and Jagwinder Singh, related to the videos retrieved from mobile phones of accused are **Exhibit PW-20/P6**. Disclosure-cum-recovery memo of social media data of the accused Inderjit, Jaspal, Akashdeep and Jagwinder are **collectively Exhibit PW-20/P7**.

xiii. PW-20 stated that the arrested accused were shown pictures of the SFJ members during the investigation. They recognized the co-accused, Gurpatwant Singh Pannun and Rana Singh @ Harpreet Singh. Copies of the Photo Identification Memorandum are **collectively Exhibit PW-20/P8**.

xiv. Further, the investigation revealed that on 14.08.2020, Inderjit sent a recorded video of the crime to Rana Singh and discussed with Jagwinder Singh (A-4) about attending a "*Referendum 2020*" meeting at Anandpur Sahib Gurudwara on the same day. Later that evening, Inderjit, Jaspal, Jagwinder, and four others (including Jagwinder's brother) traveled to Anandpur Sahib in Jagwinder's Fortuner car. They stayed there until 16.08.2020 and returned in the evening. Inderjit and Jaspal disclosed to Jagwinder about hoisting of the Khalistan flag and the tearing of the Indian National Flag at the DC Office Complex, Moga on 14.08.2020. Despite knowing commission of the offence, Jagwinder harboured Inderjit and Jaspal on the night of 16.08.2020. He stated that on 17.08.2020, Inderjit and Jaspal left their mobile phones in the Fortuner car and moved away.

xv. The mobile phones were later recovered and seized during the investigation, along with the Fortuner car. A copy of Seizure Memo of the phones and car is **Exhibit PW-20/P9**. Disclosure statements of the accused Inderjit Singh, Jaspal Singh, Akashdeep Singh and Jagwinder Singh are **collectively Exhibit PW-20/P10**.

xvi. The witness further deposed that the investigation revealed that on 17.08.2020, Inderjit and Jaspal arrived in Amritsar, where Inderjit called Rana Singh @ Harpreet Singh to request the reward money for hoisting the Khalistan flag at the DC Office Complex in Moga. In response, Rana Singh sent an MTCN code to Inderjit, informing him that Rs. 20,000 (approximately USD 267.64) had been sent as a reward. On 19.08.2020, Inderjit and Jaspal went to Mannapuram Finance Ltd, a franchise of Western Union Services, on Tarn Taran Road in Amritsar. Inderjit showed the MTCN code to the cashier and branch manager, depositing a copy of his Aadhar Card for identification purposes. The manager verified the MTCN number and recorded Inderjit's details, including his name, address, Aadhar Card number, mobile number, occupation, and relationship to the sender. He stated that the investigation revealed that the money had been sent by Gurpal Singh from Richmond Hill, New York, USA. Further, CCTV footage from Mannapuram Finance Ltd was analysed, showing Inderjit and Jaspal entering and leaving the premises on 19.08.2020. The copy Customer detail of Inderjit Singh along with register and Western Union detail showing money transferred to Inderjit is **Exhibit PW-20/P11**. A copy of the production-cum-seizure memorandum of the register containing the particulars of Inderjit produced by the Branch Head Mannapuram Finance Ltd. Tarn Taran Road, Amritsar along with Photo Identification Memo of Inderjit and Jaspal is **collectively Exhibit PW-20/P12**.

xvii. He further deposed that based on the evidence on record, pursuant to the investigation carried out by NIA, 1st Supplementary Charge Sheet dated 19.02.2024 was filed before the NIA Special Court, Mohali, Punjab in RC-30/2020/NIA/DLI. Copy of first supplementary Chargesheet in RC-30/2020/NIA/DLI is **collectively Exhibit PW-20/P13**. He deposed that the investigation revealed that accused Rana Singh @ Harpreet Singh resides in Richmond Hill, New York, whose Indian residence is in Ropar, Punjab and is a member of Sikhs for Justice (SFJ), and his handler is accused Gurpatwant Singh Pannun. He stated that in Richmond Hill, accused Rana Singh and his associates collected funds from Indian residents belonging from Punjab and Haryana and have businesses, shops, and stores. These funds were used by Rana Singh and Gurpatwant Singh Pannun to propagate anti-government sentiments and to demand the creation of a separate State in the name of Khalistan. Accused Rana Singh and Gurpatwant Singh Pannun preach anti-Indian slogans and exhort "Fight for Khalistan". Accused Rana Singh collected funds in connivance with accused Gurpatwant Singh Pannun and sent these funds to India to his supporters/sympathizers for secession of Punjab. He also stated that further investigation revealed that on 18.08.2020, Rana Singh went to a Western Union shop/store in Richmond Hill, where he sent \$267 (US) to Inderjit Singh in Punjab, India. Rana Singh provided a passport copy, phone number, and address of an individual named Gurpal, who was linked to the transaction. It was discovered that Rana Singh had used forged documents i.e. Gurpal Singh's passport, to send the funds to Inderjit Singh. A copy of the Photo Identification Memo along with production memo of the documents related to Gurpal Singh, produced by Malkeet kaur w/o Gurpal is **Exhibit PW-20/P14**. Photo Identification memo done by the owner of the Western Union shop, USA in which he identified Rana Singh and Gurpatwant Singh Pannun is **Exhibit PW-20/P15**.

xviii. He also deposed that during the investigation, several witnesses were examined, and their statements were recorded under Sections 161 and 164 of the Cr.P.C. The statements revealed that members of Sikhs for Justice (SFJ) have been recruiting Sikh youths through social media, encouraging them to carry out illegal activities against the Government of India. These unlawful activities were being funded by proxies of SFJ from abroad. The statements further disclosed that the arrested accused were attempting to recruit more individuals into their terrorist group and were seeking assistance to carry out unlawful tasks assigned by their foreign handlers. The statements of the protected witnesses (*in terms of Section 44 of the UAPA*) code named as X-1, X-2 and X-3 for the perusal of this Tribunal, are **collectively Exhibit PW-20/P16** (in sealed cover). Copy of the statements of witnesses recorded u/s 161 are **collectively Exhibit PW-20/P17**. It is further stated that Charge has been framed against the respective accused under concerned Sections and copy of the same is **Exhibit PW-20/P18**.

RC-22/2022/NIA/DLI

xix. Regarding the case RC-22/2022/NIA/DLI, PW-20 deposed that on 17.05.2022, the Ministry of Home Affairs (MHA) issued an Order No. 11011/39/2022/NIA, in exercise of its powers under sub-section (5) of section 6 read with section 8 of the National Investigation Agency Act, 2008, directing the National Investigation Agency (NIA) to take up the investigation of the case. The investigation was initiated based on credible information received by the Central Government regarding an incident on 23.04.2022. At around 7:30 PM on 23.04.2022, a team of Chandigarh Police QRT, while patrolling, noticed flames in the bushes

near the back wall of Burail Jail. The patrolling team stopped immediately at the spot to check the flames and saw there was fire in the bushes and suspiciously tiffin looking like IED, an object looking like detonator and a black color bag was lying near the tiffin. The fire was about to reach the tiffin and was extinguished. Accordingly, FIR No. 33 dated 24.04.2022, under sections 03 and 04 of the Explosive Substances Act, 1908, was registered at Police Station-49, Chandigarh against unknown persons. Copy of the RC-22/2022/NIA/DLI along with FIR No. 33 dated 24.04.2022, Police Station-49, Chandigarh, are **collectively Exhibit PW-20/19**. Order No. 11011/39/2022/NIA dated 17.05.2022, issued by the Ministry of Home Affairs, Government of India is **Exhibit PW-20/20**.

xx. He testified that on 14.05.2023, a search was conducted at the houses of six associates of Jaswinder Singh Multani, who were linked to the accused through WhatsApp groups such as "*SIKHS FOR JUSTICE*," "*Referendum 2020*," and "*KHALISTAN KI JUNG*." During the search, four mobile phones containing incriminating material were seized. Copies of the various seizure made in RC-22/2022/NIA/DLI is **collectively Exhibit PW-20/21**.

xxi. PW-20 deposed that during the investigation, several witnesses were examined, and their statements were recorded under Sections 161 and 164 of the Cr.P.C. These statements revealed that members and leaders of Sikhs for Justice (SFJ) and Khalistani groups informed the witnesses about the 1984 genocide and linked them to SFJ's WhatsApp group and further informed that the name of their leader is Pannun, who is declared a designated terrorist in India and working against the country. Members and leader of SFJ and Khalistani groups have been found to be involved in unlawful activities. The statements of the protected witnesses (X-1, X-2, X-3, and X-4), in terms of Section 44 of the UAPA, are collectively **Exhibit PW-20/22**, except for X-1 (which has been produced in a sealed cover). Copy of the statements of the witnesses recorded u/s 161 Cr.P.C. are **collectively Exhibit PW-20/23**.

xxii. During the investigation, the Facebook account of accused Jaswinder Singh Multani was analyzed. It revealed that Multani used to share anti-national and secessionist posts on his Facebook profile. He was the admin of the SFJ WhatsApp group, where he shared photos of arms and ammunition and activities related to SFJ. Additionally, he provided training on how to operate hand grenades and pistols to members of his group through video calls. Accused Jaswinder Singh Multani has been declared a Proclaimed Offender (PO) in case RC-22/2022/NIA/DLI by the NIA Court, Chandigarh, on 31.05.2023. A copy of the order dated 31.05.2023 is **Exhibit PW-20/24**.

xxiii. He further stated no arrest has been made in the RC-22/2022/NIA/DLI case, and the investigation is still ongoing.

RC-35/2021/NIA/DLI

xxiv. PW-20 testified that on 30.12.2021, the Ministry of Home Affairs (MHA) issued an Order No. 11011/80/2021/NIA, directing the National Investigation Agency (NIA) to register case RC-35/2021/NIA/DLI under sections 120B, 121A of the Indian Penal Code (IPC), and sections 10, 13, 17, 18, and 18-B of the Unlawful Activities (Prevention) Act (UAPA), 1967 after receiving information that Jaswinder Singh Multani, a member of Sikhs for Justice (SFJ), along with his associates both in India and abroad, had been actively radicalizing, motivating, and recruiting youths in Punjab through social media

platforms like Facebook, Twitter, YouTube, Telegram, WhatsApp, and Signal to propagate their ideology with the aim to secede Punjab from the Union of the India. He stated that they were also involved in raising funds to send arms, ammunition, and explosives into Punjab to carry out terror attacks and revive terrorism in the region. He deposed that Jaswinder Singh Multani, along with other associates such as Jagdish Singh Bhura of Khalistani Zindabad Force (KZF), Gurmeet Singh, Deputy Chief of KZF and associated with “Sikhs for Justice”, Ranjeet Singh Pakhoke @ Baba of Khalistan Tiger Force (KTF), Sukhdev Singh Heran, Hardeep Singh Nijjar of Babbar Khalsa International (BKI), Paramjit Singh Pamma, and Ranjeet Singh Neeta, both members of KTF, along with other pro-Khalistan elements, based in India and abroad conspired to propagate their ideology with the aim to cede Punjab from Union of India. A copy of RC-35/2021/NIA/DLI is **Exhibit PW-20/25**, and the Order No. 11011/80/2021/NIA dated 30.12.2021 is **Exhibit PW-20/26**.

xxv. He deposed that searches were conducted at 08 locations in Punjab and Delhi at the premises of suspected associates who were in contact with Jaswinder Singh Multani, Paramjeet Singh Pamma, and Hardeep Singh Nijjar, operatives and members of Sikhs for Justice (SFJ). During these searches, incriminating material, including 06 mobile phones belonging to the suspects, were seized. The details of these seizures are collectively marked as **Exhibit PW-20/27**. Several witnesses were examined during the investigation, and their statements were recorded under Section 161 of the Cr.P.C. These statements revealed that members and leaders of SFJ and Khalistani associations were involved in unlawful activities. A copy of the various seizures made in RC-35/2021/NIA/DLI is **collectively Exhibit PW-20/27**. A copy of the statements of witnesses recorded under Section u/s 161 Cr.P.C. in RC-35/2021/NIA/DLI is **collectively Exhibit PW-20/28**.

xxvi. PW-20 deposed that a Non-Bailable Warrant of Arrest was issued by the Special NIA Court, Mohali, Punjab, against members of Sikhs For Justice, including Gurmeet Singh, Paramjit Singh Pamma, Ranjeet Singh Neeta, and Jaswinder Singh Multani, in case RC-35/2021/NIA/DLI. A copy of the warrant is collectively marked as **Exhibit PW-20/29**. He further stated that no arrests have been made in this case, which remains under investigation.

xxvii. The witness further stated on oath that aforesaid FIRs/RCs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was imposed by Ministry of Home Affairs, are continuously indulging in secession and secessionist activities in a clandestine manner and if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

43. PW-21

i. PW-21 Ms. Anita Saini, Deputy Superintendent of Police/Admin/GRP/Punjab, tendered her affidavit **Exhibit PW-21/A**, after due authorization by Competent Authority. She deposed that she is the Deputy Supervisory Officer of the FIR No. 62 dated 05.09.2023, under Section 153-B IPC, registered at

Police Station GRP Bathinda (mentioned at Serial No. 49 of the Background/Reference Note); FIR No. 73 dated 06.12.2023, under Section 153-B IPC, registered at Police Station GRP Bathinda (not mentioned in the Reference Note); FIR No. 65 dated 11.08.2022, under Section 2 of the Prevention of Insults to National Honours Act, 1971, and Section 120-B IPC, registered at Police Station GRP Amritsar (mentioned at Serial No. 41 of the Background/Reference Note) and FIR No. 119 dated 29.11.2023, under Section 153-B IPC, registered at Police Station GRP Amritsar, mentioned at Serial No. 50 of the Background/Reference Note. The contents of the affidavit are stated to be based on records revealed during the investigation and on her personal knowledge acquired during 23 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No.62 of 2023 ,PS GRP Bathinda

ii. PW-21 deposed that on 05.09.2023, a Memo was received from Station Master Railway Station Kotfatta Northern Railway stating thereby that he has been informed by the Driver of the train bearing Number CFCS-MKS Load UP Line KM No. 279/19-21 that a Red Colour Flag has been furlled by someone on the track of the said railway line but none has been present there and word Khalistan was found inscribed on the said Flag with black letters. FIR was accordingly registered against the unknown persons and immediately SI Jasveer Singh SHO, Police Station GRP Bathinda along with Police party reached at Railway Station the place of incident and investigation was commenced. The said flag of KHALISTAN was removed by pointsman on the instructions of Station Superintendent Railway Station Kotfatta. During investigation, the said flag was produced by Station Superintendent and was taken into custody vide recovery memo dated 05.09.2023. The case is stated to be still under investigation.

iii. True copy of FIR No.62 of 2023 in vernacular is **Exhibit PW-21/P1** and English translation thereof is **Exhibit PW-21/P2**; true copy of the recovery memo is **Exhibit PW-21/P3** and English translation is **Exhibit PW-21/P4**. True copy of the recovery memo of the flag and English translation thereof is **Exhibit PW-21/P5** and **Exhibit PW-21/P6** respectively.

FIR No. 73 of 2023, PS GRP Bathinda, Punjab

iv. PW-21 testified that in the aforesaid case, an application was moved by Sandeep Pathak, Advocate, Hindu Maha Gathbandan, Bathinda, to register an FIR against persons who had fixed the posters/banners at Bathinda-Mansa Road underbridge with reference to Khalistan Association. On receipt of the said application, ASI Pakhar Singh along with police party reached the spot and after verification of the facts, Rukka was sent u/s 153B of IPC. FIR was accordingly registered. She further deposed that on the basis of record and evidence of interconnected FIR No. 233, dated 03.12.23 registered u/s 153, 153-A, 505, 120-B of IPC PS Canal Colony Bathinda, two accused were arrested and the case is still under investigation.

v. True copy of FIR in vernacular is **Exhibit PW-21/P7** and English translation thereof is **Exhibit PW-21/P8**. True copy of the complaint made by Sandeep Pathak and English translation thereof is **Exhibit PW-21/P9** and **Exhibit PW-21/P10**. True copy of the record and evidence of interconnected FIR No. 233/2023, PS: Canal Colony, Bathinda is collectively **Exhibit PW-21/P11** and translation thereof is **Exhibit PW-21/P12** (colly).

FIR No. 65/2022, Police Station Govt. Railway Police, Amritsar ,Punjab

vi. PW-21 deposed that FIR No. 65/2022 was registered after a letter dated 11.08.2022 was received from Railway Headquarter Baroda House, New Delhi endorsed by Office of Govt. Rly. Police Patiala that a burned National Flag was found hanging on a tree at KM NO 503/25-27, under over bridge number 131-A between RLY-STN AMRITSAR-MANAWALA OVER BRIDGE. As investigation of case was carried out, a wooden stick was recovered from place of incident which was taken into possession vide seizure memo dated 11.08.2022. She further deposed that the final report was submitted in the court of JMIC, Amritsar on 18.01.2023. The case is pending trial and the charge was framed under section 2 of Prevention of Insults to National Honours Act, 1971, 120-B IPC on dated 06.07.2023.

vii. Further, she stated that several witnesses have been examined in the aforesaid case till 20.07.2023 and the case was fixed for prosecution evidence for 30.10.2024. True copy of FIR in vernacular is **Exhibit PW-21/P13** and translation thereof is **Exhibit PW-21/P14**. True copy of the seizure memo is **Exhibit PW-21/P15** and translation thereof is **Exhibit PW-21/P16**. True copy of charge sheet is **Exhibit PW-21/P17** and translation thereof is **Exhibit PW-21/P18**.

FIR no. 119/2023, Police Station Govt. Railway Police, Amritsar,Punjab

viii. PW-21 deposed that FIR No. 119/2023 under Sections 153-B and 120-B IPC was registered at Police Station Govt. Railway Police, Amritsar (Punjab) since a video was uploaded by Gurpatwant Singh Pannun (President of Sikhs for Justice Organization) on Facebook and WhatsApp, wherein “Khalistan Zindabad” and “Boycott of AIR INDIA” (slogans) were inscribed on pillars and wall of new overbridge on KM No. 510/34 between Railway Stations Amritsar-Manawala with the black ink. She further testified that the final report in aforesaid case was submitted in the court of CJM, Amritsar on 30.04.2024. The case is pending before the Court of Ms. Parminder Kaur, CJM Amritsar and the charge was framed under section 153-B(1) IPC on 28.05.2024.

ix. The case is stated to be fixed for remaining prosecution evidence for 05.12.2024. True copy of FIR in vernacular is **Exhibit PW-21/P19** and translation thereof is **Exhibit PW-21/P20**. True copy of charge sheet is **Exhibit PW-21/P21** and translation thereof is **Exhibit PW-21/P22**.

x. PW21 deposed on oath that the aforesaid FIR has been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was imposed by Ministry of Home Affairs, are continuously indulging in cession and secessionist activities in a clandestine manner and as such was of the view that if the ban is not extended and if its SFJ’s unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

44. PW-22

i. **PW-22 Kuldip Singh**, Sub-Inspector In-charge, Police Post, Sector 43, UT, Chandigarh, tendered his affidavit **Exhibit PW-22/A**, after due authorization by the Competent Authority. He deposed regarding

FIR No. 51 of 2023 dated 26.01.2023, registered under Section 3(1) of the Delhi Prevention of Defacement of Public Property Act, 2007 registered at P.S. Sector 36, UT, Chandigarh, mentioned at Serial No. 95 in Annexure II to the Background Note. The contents of the affidavit are stated to be based on records revealed during the investigation and on his personal knowledge acquired during 12 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 51/2023, Police Station Sector-36, Chandigarh

ii. PW-22 deposed that FIR No. 51/2023 under section 3(1) of Delhi Prevention of Defacement of Public Property Act, 2007 was registered at P.S. Sector 36, UT, Chandigarh on 26.01.2023 when SI Raj Kumar/CHG informed that during his patrolling duty near Beant Singh Memorial, Sector-42, Chandigarh, he and other police officials saw that the display board of Beant Singh Memorial was defaced with “SFJ Jindabaad and Khalistan Jindabad” inscription by some unknown persons. He stated that during inspection, photographs of the incident spot were taken. A Final Untrace Report dated 21.08.2024 is stated to have been filed after investigation.

iii. The copy of FIR in vernacular is **Exhibit PW-22/P1** and English translation thereof is **Exhibit PW-22/P2**; copy of the photographs is **Exhibit PW-22/P3 (colly)** and copy of the letter dated 11.06.2024 seeking permission to file an Untrace Report along with true copy of the Untrace Report dated 21.08.2024 with English translation thereof is **Exhibit PW-22/P4 (colly)**.

45. PW-23

i. **PW-23 Adarshdeep Singh**, Deputy Superintendent of Police, Sirsa, Haryana, tendered his affidavit **Exhibit-PW-23/A**, after due authorization by the Competent Authority. He deposed regarding the FIR No. 148/2023, under Sections 120-B, 124-A IPC, and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at Police Station Sirsa Sadar, mentioned at Serial No. 66 of the reference note. The contents of the affidavit are stated to be based on record revealed during the investigation and on his personal knowledge acquired during 13 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 148/2023, PS-Sirsa Sadar, Haryana

ii. PW-23 deposed that FIR No.148/2023 under Sections 120-B, 124-A IPC, and Section 13 of the Unlawful Activities (Prevention) Act, 1967 was registered on the statement of EHC Jitender Kumar on 07.04.2023 whereby he stated that anti-India slogans in English and Punjabi were found written on the wall of Airforce Station, Sirsa. The words in English when combined together read “Hindustan Murdabad”. The slogan related to Khalistani movement and incited the secession of Punjab from India. These included “*Hindustan Murdabad*” (in English) accompanied with the term “SFJ”, “G-20, Delhi 100,000 Dollar” (in English), “Khalistani Flag, Pragati Maidan” (in English) along with “*Khalistan Zindabad*” (in Punjabi).

iii. The Copy of the FIR in vernacular along with English translation thereof is **Exhibit PW-23/P1**; Photograph(s) of the wall of the Airforce Station, Sirsa are **Exhibit PW-23/P2**. Statements of E/SI Om Prakash, a finger print expert and complainant EHC Jitender Singh recorded under Section 161 Cr.P.C. in vernacular along with English translations thereof are **Exhibit PW-23/P3** and **Exhibit PW-23/P4** respectively.

iv. He further testified that during the course of investigation, a bottle of spray paint and a piece of yellow cloth on which “Khalistan” was written, were recovered but no finger prints were found at the spot. Apart from above, a white cloth containing spray paint bottle was taken into possession. Copy of seizure memo of white cloth in vernacular along with English translation thereof is **Exhibit PW-23/P5** and seizure memo in respect of yellow cloth on which Khalistan was written in vernacular along with English translation thereof is **Exhibit PW-23/P6**. Witness further deposed that the accused could not be traced and an Untrace Report was filed. True copy of Untrace Report in vernacular and English translation thereof is **Exhibit PW-23/P7**.

v. PW-23 deposed that the abovementioned FIR has been registered against the SFJ subsequent to the ban imposed upon it in 2019. The investigation reveals that Gurpatwant Singh Pannun, other leaders of the SFJ and members are consistently engaged in activities aimed at incitement to cede from the Indian Union. The witness was of the view, based on the facts and attendant circumstances, that if allowed to fester, the activities of the SFJ could result in the revival of the Khalistani movement.

46. PW-24

i. **PW-24 Rajesh Kumar Mohan**, Assistant Superintendent of Police, Hisar, Haryana, tendered his affidavit **Exhibit PW-24/A**, after due authorization by Competent Authority. He deposed with respect to FIR No. 31/2022, under Sections 120-B, 124-A, 336, 379 IPC; Section 3 of the Public Property (Prevention of Damage) Act, 1984; Section 66F of the Information Technology Act; Section 150 of the Railways Act, 1989; and Sections 10 and 13 of the Unlawful Activities (Prevention) Act, 1967, dated 16.07.2022, registered at Cyber Crime Police Station, Hisar, mentioned at Serial No. 62 of the Reference Note. The contents of the affidavit are stated to be based on records revealed during the investigation and on his personal knowledge acquired during 3 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No.31/2022, PS-Cyber Crime, Hisar, Haryana

ii. PW-24 deposed that the FIR No.31/2022 was registered on complaint of PSI Amit Kumar I/C, Cyber Cell, DPO-Hisar that an audio-video with the thumbnail “Khalistan Flag Raised – Rail Clippers Removed – Rajiv Gandhi Thermal Plant Haryana – 15 August – Plunge India to Darkness” was being circulated on social media. He further stated that the person in the video identified himself as Gurpatwant Singh Pannun, the chief of SFJ. Copy of FIR in vernacular along with English translation thereof is **Exhibit PW-24/P1**.

iii. PW-24 further testified that during the course of investigation, IO visited the place of occurrence wherein the clips of the railway track were removed and collected the data in respect of the mobile phones

which were active at the relevant time in respect of the place of incident wherein the clips of the railway track were removed.

iv. He deposed that an Untrace Report was prepared. However, the same was not filed and a Special Investigation Team was constituted for further investigation into the case. The accused could not be traced and the investigation is pending.

v. Copy of the order dated 28.11.2023 passed by office of Superintendent of Police, Hisar constituting the Special Investigation Team is **Exhibit PW-24/P2**; Pen-drive produced by the complainant containing the video footage which was downloaded from YouTube is **Exhibit PW-24/P3** and Certificate under Section 65B of the Indian Evidence Act, 1872 pertaining to the pen drive, in vernacular along with English translation thereof is **Exhibit PW-24/P4**.

vi. The witness testified that the above mentioned FIR has been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. The investigation reveals that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. He was of the view that if the ban to the SFJ is not extended, it cannot be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

47. PW-25

i. PW-25 Ms. Deepti Garg, Superintendent of Police, Dabwali (presently posted as Commandant of 4th Battalion, IRB, Manesar, Gurugram), tendered her affidavit **Exhibit PW-25/A**, after due authorization by Competent Authority. She deposed that she is the Supervisory Officer of FIR No. 627/2022 under Sections 120-B, 124-A IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967, and FIR No. 473/2023 under Sections 120-B, 124-A IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967, both registered at Police Station City Mandi Dabwali, Dabwali and mentioned at Serial Nos. 63 and 67 respectively of the Reference Note. The contents of the affidavit are stated to be based on records revealed during the investigation and on her personal knowledge acquired during 4 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 627/2022, Police Station-City Mandi Dabwali, Dabwali, Sirsa, Haryana

ii. PW-25 deposed that FIR No.627/2022 dated 07.12.2022 u/s 120-B, 124-A IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967 was registered at P.S. City Mandi Dabwali, Dabwali on information by EHC Rohtash No.1167/Sirsa who found that some anti-national slogans were written in English and Punjabi language on the wall of B.R. Ambedkar College, Dabwali. The phrases “BRAHMINES LEAVE PUNJAB-HR, HARYANA BANEGA KHALISTAN, BRAHMINS HINDU RESPONSE 1984 SIKH GENOCIDE, SFJ” (in English), “KHALISTAN ZINDABAD, SFJ” (in Punjabi) were written along

with the date “29 JANUARY” (in Punjabi) and AUSTRALIA (in English). FIR was accordingly registered against Gurpatwant Singh Pannu and unknown person. Copy of FIR in vernacular is **Exhibit PW-25/A1** and English translation thereof is **Exhibit PW-25/A2**; The crime detail form which reflects the place of occurrence in vernacular along with English translation of the relevant extract are **Exhibit PW-25/A3** and **Exhibit PW-25/A4** respectively.

iii. Further, the property seizure and possession form dated 07.12.2022 in respect of 07 photographs and pen-drive containing the video footage of the scene of incident along with English translation thereof are **Exhibit PW-25/A5** and **Exhibit PW-25/A6** respectively. Statement of the complainant recorded under Section 161 Cr.P.C. and copy of the same along with English translation thereof are **Exhibit PW-25/A7&Exhibit PW-25/A8** respectively.

iv. She testified that an Untrace Report was prepared but is yet to be filed before the Court. However, it has been inadvertently mentioned in her affidavit that the Untrace Report has been filed. Copy of the Untrace Report dated 05.09.2023, in vernacular along with English translation thereof are **Exhibit PW-25/A9** and **Exhibit PW-25/A10** respectively.

FIR No. 473/2023, Police Station-City Mandi, Dabwali, Sirsa, Haryana

v. PW-25 further deposed that FIR No.473/2023 dated 31.07.2023 u/s 120-B, 124-A IPC and Section 13 of Unlawful Activities (Prevention) Act, 1967 was registered at P.S. City Mandi, Dabwali, Sirsa on information by EHC Rohtash No.1167/Sirsa that certain anti-national slogans were written on the walls of the office of the Sub-Divisional Magistrate. The terms “HARYANA KHALISTAN” (in English), “KHALISTAN ZINDABAD” (in Punjabi “KHALISTAN HARYANA BANEGA, SFJ KHALISTAN, MODI, KHATTAR, VIZ, SFJ THOKO” (in English), “KHALISTAN BATEGA-HR” (in Punjabi) “HARYANA BANEGA, KHALISTAN”, “KHALISTAN SFJ” (in English) were written. True copy of FIR in vernacular along with English translation thereof are **Exhibit PW-25/A11** and **Exhibit PW-25/A12** respectively; Copy of photographs taken from the spot are collectively **Exhibit PW-25/A13**. The crime detail form of the place of incident, in vernacular along with English translation of the relevant portion are **Exhibit PW-25/A14 & Exhibit PW-25/A15** respectively.

vi. She testified that during investigation, it emerged that none had witnessed any individual writing the words on the wall. Copy of statement of Lakshman Singh, Chowkidar, Court Complex, Dabwali and Vinod Kumar, Treasury Guard, Court Complex recorded under Section 161 Cr.P.C., in vernacular along with English translation thereof are **Exhibit PW-25/A16, Exhibit PW-25/A17, Exhibit PW-25/A18** and **Exhibit PW-25/A19** respectively.

vii. She further deposed that an Untrace Report was prepared but is yet to be filed before the Court. However, it has been inadvertently mentioned in her affidavit that the Untrace Report has been filed. Copy of Untrace Report dated 17.06.2024, in vernacular along with English translation thereof are **Exhibit PW-25/A20** and **Exhibit PW-25/A21** respectively.

viii. PW-25 deposed that despite being banned in 2019, SFJ has been actively and incessantly encouraging the secession of Punjab from the territory of India. The above acts are against the territorial integrity of India and are aimed at inciting local Sikhs against the legal and constitutional framework of the Government of

India. These and other allied activities of the SFJ, under the leader of Gurpatwant Singh Pannun pose a grave threat to the security and safety of Indian residents. These activities have the potential of disrupting the peace, unity and integrity of the country. Therefore, if not curbed these activities could result in the revival of the Khalistani movement.

48. PW-26

i. PWS-26 Siddhant Jain, Deputy Commissioner of Police, Gurugram, Haryana (now Superintendent of Police, Dabwali), tendered his affidavit **Exhibit-PW26/A**, after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No. 137 dated 02.07.2020 under Sections 124A and 153A IPC and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act, registered at Police Station Bhondsi, Gurugram, and FIR No. 52 dated 29.08.2021 under Sections 124A and 153A IPC and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act, registered at Police Station Cyber Crime, Gurugram, mentioned at Serial Nos. 56 and 59 of the Reference Note.

ii. Additionally, he is the Supervisory Officer of FIR No. 45 dated 05.08.2021 under Sections 124A and 153A IPC and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act; FIR No. 28 dated 15.04.2022 under Sections 124A and 153A IPC and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act, 1967; and FIR No. 45 dated 06.08.2022 under Section 66 of the Information Technology Act, Sections 124A and 153A IPC, and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act, all registered at Police Station Cyber Crime, Gurugram. The latter set of FIRs (i.e. FIR No. 45/2021, 28/2022 and 45/2022) do not find mention in the Reference Note but are relied upon as additional evidence. The contents of the affidavit are stated to be based on record revealed during the investigation and on his personal knowledge acquired during 6 years of service. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 137/2020, Police Station Bhondsi, Gurugram

iii. PW-26 deposed that FIR No. 137 dated 02.07.2020 under Sections 124A and 153A IPC and Sections 10(a) and 13 UA(P) Act was registered at P.S. Bhondsi, Gurugram on complaint of Inspector Anand Kumar, Special Task Force, Bhondsi, Gurugram. As per FIR, Inspector Anand Kumar received information regarding the circulation of a pre-recorded audio-video message which stated that the people of Haryana and the elected government are inimical to the interest of Sikhs and Punjabis. The individual delivering this message identified himself as Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice. Copy of the FIR is **Exhibit PW-26/A1** and Pen drive containing the above audio-video message, along with its transcript are **Exhibit PW-26/A2** and **Exhibit PW-26/A3** respectively.

iv. PW-26 testified that the original source of the Audio-Video message could not be ascertained. An Untrace Report was prepared but not filed before the concerned court and the case is still pending investigation. Copy of the Untrace Report in vernacular along with its English translation are **Exhibit PW-26/A4** and **Exhibit PW-26/A5** respectively.

FIR no. 52/2021, PS-Cyber Crime, Gurugram

v. The witness further deposed that FIR No. 52 /2021 u/s 124A and 153A IPC & Sections 10 (a) and 13 UA(P) Act, was registered at P.S. Cyber Crime, Gurgaon after a complaint was received from the in-charge Technical Division, Special Task Force, Bhondsi, Gurugram regarding the circulation of a pre-recorded audio-video message which stated that the people of Haryana and the elected government were acting against the interest of the people of Punjab. He deposed that the individual delivering this message identified himself as Gurpatwant Singh Pannun. Copy of the FIR is **Exhibit PW-26/A6**; Pen drive containing the aforesaid audio-video message, along with its transcript are **Exhibit PW-26/A7** and **Exhibit PW-26/A8** respectively.

vi. He further deposed that an Untrace Report was filed on 16.12.2023 with directions to continue investigation in case any clue is found in future. Copy of the Untrace Report, in vernacular along with its English translation thereof are **Exhibit PW-26/A9** and **Exhibit PW-26/A10** respectively.

FIR no. 45/2021, PS-Cyber Crime, Gurugram

vii. PW-26 testified that FIR No. 45 dated 05.08.2021 under Sections 124A and 153A IPC & Sections 10 (a) and 13 UA(P) Act, was registered at P.S. Cyber Crime, Gurgaon on complaint of Shri Madan Lal, Inspector, Special Task Force, Bhondsi, Gurugram. According to the complaint, a pre-recorded audio-video message stating that the people of Haryana and the elected government are acting against the interest of the people of Punjab was being circulated. He testified that the individual delivering this message identified himself as Gurpatwant Singh Pannun. Copy of FIR is **Exhibit PW-26/A11** and Pen drive containing the above audio-video message, along with its transcript thereof is **Exhibit PW-26/A12** and **Exhibit PW-26/A13** respectively. PW-26 further deposed that in the case an Untrace Report has been filed. Copy of the Untrace Report, in vernacular along with its English translation thereof are **Exhibit PW-26/A14** and **Exhibit PW-26/A15** respectively.

FIR no. 28/2022 PS- Cyber Crime, Gurugram

viii. PW-26 deposed that FIR No. 28/2022 dated 15.04.2022 under Sections 124A and 153A of the IPC and Sections 10(a) and 13 of the Unlawful Activities (Prevention) Act was registered at P.S. Cyber Crime, Gurgaon on information from Shri Madan Lal, In-charge, Special Task Force, Gurugram. As per the complaint, an audio-video message was being circulated on YouTube which showed Gurpatwant Singh Pannun re-asserting Punjab's claim on Haryana. Further, in a video statement Gurpatwant Singh Pannun announced that SFJ will launch "Haryana Banyega Khalistan" campaign on 29th April to recruit volunteers who will advocate for liberation of Haryana from Indian occupation through Khalistan Referendum. He stated that FIR also mentions that SFJ has released a map of the areas earmarked for cessation from India through Khalistan. Copy of FIR is **Exhibit PW-26/A16** and Pen drive containing the aforesaid audio-video message, along with transcript thereof is **Exhibit PW-26/A17** and **Exhibit PW-26/A18** respectively.

ix. He further deposed that an Untrace Report has been filed in the matter. Copy of the Untrace Report, in vernacular along with its English translation thereof are **Exhibit PW-26/A19** and **Exhibit PW-26/A20** respectively.

FIR No. 45/2022, PS-Cyber Crime, Gurugram.

x. PW-26 testified that FIR No.45 dated 06.08.2022 u/s 66 Information Technology Act, Sections 124A and 153A IPC, & Sections 10 (a) and 13 UA(P)A was registered at P.S. Cyber Crime, Gurgaon on complaint

from SI Praveen Kumar, Special Task Force, Gurugram with respect to a pre-recorded audio-video message being circulated on Twitter (now “X”). He deposed that in the audio-video message, Gurpatwant Singh Pannun is seen stating *“India has occupied Punjab. This is the last war of freedom for the people of Punjab. Punjab’s last war of independence has started on 75 years of independence. On 15th August 2022 Khalistani flag should be hoisted at every house and the tri-color should be burnt. The questions before the people of Punjab are whether they are with Hindustan or with Sikh community. The last war for freedom has begun”*.

xi. Copy of FIR is **Exhibit PW-26/A21** and Pen drive containing the above audio-video message, along with transcript thereof are **Exhibit PW-26/A22** and **Exhibit PW-26/A23** respectively. He deposed that an Untrace Report has been filed in the case. Copy of the Untrace Report, in vernacular along with its English translation thereof is **Exhibit PW-26/A24** and **Exhibit PW-26/A25** respectively.

xii. PW-26 further testified that the aforesaid FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after the same was banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. Further, he was of the view that if the ban to the SFJ is not extended, it cannot be curbed and controlled immediately and it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

49. PW-27

i. PW-27. Mohit Handa, Deputy Commissioner of Police, Crime, Gurugram (earlier posted as Superintendent of Police, Karnal, Haryana), tendered his affidavit **Exhibit PW-27/A**, after due authorization by the Competent Authority. He deposed regarding FIR No. 972 dated 23.12.2020 under Section 120B IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at Police Station Karnal Sadar and FIR No. 414 dated 20.06.2022 under Sections 120B, 153A IPC, and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at Police Station Civil Lines, District Karnal mentioned at Serial Nos. 58 and 61 of the background note. The contents of the affidavit are stated to be based on record revealed during the investigation conducted in the said cases and on his personal knowledge acquired during 09 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No.972/2020, P.S. Sadar Karnal

ii. PW-27 deposed that FIR No.972/2020 dated 23.12.2020 u/s 120B IPC & Section 13 Unlawful Activities (Prevention) Act, 1967 was registered at P.S. Sadar Karnal on complaint received from Inspector Pawan Kumar, In-charge, STF Unit, Hisar. As per the information, one Tej Parkash Singh and Akash Deep r/o village Doraha, Tehsil Payal, District Ludhiana were transporting weapons from Uttar Pradesh and were in contact with one Gurmeet Singh, who resides abroad and is associated with SFJ. He further stated that according to the complainant, said Gurmeet Singh was providing funds to Tej Prakash Singh and Akash Deep. The aforesaid accused Tej Prakash and Akash Deep were arrested on 23.12.2020 with arms along with

ammunition in their possession. Copy of the FIR in vernacular along with English translation thereof are **Exhibit PW-27/A1** and **Exhibit PW-27/A2** respectively. Copy of *Fard Nishandehi/pointing out memo* along with translation thereof are **Exhibit PW-27/A3** and **Exhibit PW-27/A4** respectively.

iii. He testified that accused Tej Prakash in his disclosure statements stated that he was in contact with Gurmeet Singh who had instructed him to murder one Sudhir Suri r/o Amritsar and Gursharan Mandr r/o Ludhiana due to their alleged statements against his religion. Further, Tej Prakash admitted that the co-accused Akash Deep had knowledge of the above. He disclosed that the arms were received from a person in Uttar Pradesh as instructed by Gurmeet Singh. In addition, some money was also stated to have been received from Gurmeet Singh, which was used to purchase mobile phones and weapons. Copy of disclosure statements of Tej Prakash dated 24.12.2020 and 27.12.2020, in vernacular along with English translation thereof are **Exhibit PW-27/A5**, **Exhibit PW-27/A6**, **Exhibit PW-27/A7** and **Exhibit PW-27/A8** respectively. Copy of statement of Akashdeep in vernacular along with English translation thereof are **Exhibit PW-27/A9** and **Exhibit PW-27/A10** respectively.

iv. Witness deposed that during investigation, a CD and a pen-drive was recovered, containing a Youtube video in which one Sudhir Suri says 2 percent can be crushed by Hindus easily. Copy of the recovery memo in vernacular along with English translation thereof are **Exhibit PW-27/A11** and **Exhibit PW-27/A12** respectively. He further deposed that the chargesheet has been filed and Sanction for prosecution has also been obtained. Thereafter, charge against the accused has been framed by the Id. Trial Court vide order dated 03.10.2022 and the matter is pending for prosecution evidence for 02.01.2025. Copy of chargesheet in vernacular along with English translation thereof is **Exhibit PW-27/A13** and **Exhibit PW-27/A14** respectively. Copy of order on charge is **Exhibit PW-27/A15**.

FIR No.414/2022, P.S. Civil Lines, Karnal

v. PW-27 deposed that FIR No.414 u/s 120B, 153A IPC & Section 13 Unlawful Activities (Prevention) Act, 1967 dated 20.06.2022 was registered at P.S. Civil Lines, Karnal at instance of Sandeep Singh, Inspector, SHO, P.S. Civil Lines Karnal. He stated that an information was received that the words “*Haryana Banega Khalistan*” (in Punjabi) and “*SFJ Har Banega Khalistan SFJ*” (in English) were written on the wall of Dayal Singh College. Also, pro-Khalistani words were painted on the wall of DAV School. Copy of FIR in vernacular along with English translation thereof are **Exhibit PW-27/A16** and **Exhibit PW-27/A17** respectively.

vi. He further deposed that during investigation, one Manjeet Singh was arrested on 03.07.2022, who in his disclosure statements admitted to writing of the aforesaid slogans and stated that he owned allegiance to Gurpatwant Singh Pannun. In addition, he mentioned about other acts showing support for Khalistan and also stated about involvement of one Resham Singh in the commission of aforesaid act. Copy of the disclosure statement dated 04.07.2022 and 06.07.2022, in vernacular along with English translation thereof is **Exhibit PW-27/A18** and **Exhibit PW-27/A19**, **Exhibit PW-27/A20** and **Exhibit PW-27/A21** respectively.

vii. He testified that Accused Resham Singh was arrested on 22.07.2022 and in his disclosure statement he admitted having been in touch with co-accused Manjeet Singh and being involved in painting the aforesaid

pro-Khalistani slogans. Copy of the disclosure statement of Resham Singh, in vernacular along with English translation thereof is **Exhibit PW-27/A22** and **Exhibit PW-27/A23** respectively.

viii. PW-27 further deposed that the chargesheet has been filed in 2022 and sanction for prosecution has also been obtained. Further, after obtaining the sanction, a supplementary chargesheet was filed and the case was last listed on 07.11.2024. Copy of supplementary chargesheet, in vernacular along with English translation thereof is **Exhibit PW-27/A24** and **Exhibit PW-27/A25** respectively; Copy of chargesheet in vernacular along with English translation thereof is **Exhibit PW-27/A26** and **Exhibit PW-27/A27** respectively; Copy of sanction order u/s 39 of the Arms Act along with English translation thereof is **Exhibit PW-27/A28** and **Exhibit PW-27/A29** respectively.

ix. The witness further stated on oath that the aforesaid FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. The same reflects that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. He was of the view that if the ban to the SFJ is not extended, it cannot be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

50. PW-28

i. **PW-28 Rajpal**, Assistant Commissioner of Police, Crime, Sonipat, Haryana, tendered his affidavit **Exhibit PW-28/A**, after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No. 293 dated 26.06.2020, under Sections 124A, 153B, and 120B IPC, registered at Police Station Sadar Sonipat and the said FIR is not mentioned in the Reference Note by the Ministry of Home Affairs but was relied upon by the witness as additional evidence. The contents of the affidavit are stated to be based on records revealed during the investigation and on his personal knowledge acquired during 21 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No. 293/2020, PS- Sadar, Sonipat, Haryana.

ii. PW-28 deposed that on 26.06.2020, Inspector Sunil, the then SHO Police Station Sadar, Sonipat accompanied by other police officials, was on a routine patrol of village Fazilpur, Sonipat wherein he received an audio recording and information that one Vikas Verma s/o Rajesh Kumar was working for Sikhs for Justice organization and had also married a Pakistani National Maham Aamir r/o Karachi. Further, he had converted to Islam and was involved in anti-India activities with the ultimate aim of establishing an independent Khalistan. He stated that Vikas Verma was also involved in instigating persons against the Government of India by sending information through the Interactive Voice Response System. The said voice messages contained several anti-India slogans. Accordingly, FIR No.293/2020 under Sections 124A, 153B, and 120B of the IPC was registered at P.S. Sadar, Sonipat. Copy of FIR in vernacular along with English translation thereof are **Exhibit PW-28/A1** and **Exhibit PW-28/A2** respectively. Copy of the recovery memo with respect

to seizure of pen drive containing the audio recording, in vernacular along with English translation thereof are **Exhibit PW-28/A3** and **Exhibit PW-28/A4** respectively.

iii. Witness further deposed that during the course of investigation, Vipul Jain was arrested on 29.12.2020, who made a disclosure statement that he is friend of Vikas Verma alias Mohd. Vikas, who had learned the work of VOIP (Voice Over Internet Protocol). Further, he procured SIM cards on fake IDs for co-accused Vikas. He also disclosed that co-accused Vikas married Maham on 16.11.2018 in Sharjah. Further, Vikas had stayed in Pakistan from 13.3.2020 to 20.12.2020, where he received training from Pakistani intelligence agencies. Vipul also disclosed that co-accused Vikas had revealed about it to him on an earlier occasion and co-accused Vikas used the (Interactive Voice Response System) IVRS network to disseminate propaganda on behalf of SFJ. PW-28 deposed that 100 SIM cards were recovered at instance of Vipul on the basis of his disclosure statement. Copy of disclosure statement of Vipul Jain in vernacular along with English translation thereof are **Exhibit PW-28/A5** and **Exhibit PW-28/A6** respectively. Copy of recovery memo recording the recovery of 100 SIM cards, in vernacular along with English translation thereof are **Exhibit PW-28/A7** and **Exhibit PW-28/A8** respectively.

iv. He testified that attempts to apprehend accused Vikas were unsuccessful and Investigation revealed that co-accused Vikas possessed a passport No.P8206565 valid till 23.03.2027 and was residing in Pakistan since March 2020. Further, a Look Out Circular No.9838/CR-4-Panchkula was issued through the Home Department and accused Vikas was accordingly arrested on 22.12.2020 from Delhi Airport. Copy of recovery memo dated 22.12.2020 seizing laptop, mobile phone and passport of accused Vikas Verma, in vernacular along with English translation thereof are **Exhibit PW-28/A9** and **Exhibit PW-28/A10** respectively.

v. He further deposed that accused Vikas led the police team to his house where a SIM Box (GSM Gateway), a wooden box of chocolate colour, 4 photographs, a pen drive, etc. were recovered and were seized vide recovery memo dated 29.12.2020 which along with English translation thereof is **Exhibit PW-28/A11** and **Exhibit PW-28/A12** respectively. Copy of disclosure statement of Vikas Verma supporting the disclosures earlier made by co-accused Vipul, in vernacular along with English translation thereof are **Exhibit PW-28/A13** and **Exhibit PW-28/A14** respectively.

vi. PW-28 deposed that co-accused Punit Kumar s/o Rakesh Kumar was arrested on 03.01.2021 who in his disclosure statement stated that he was friends with co-accused Vipul Jain for the last four years, as they both attended the same college. He also disclosed that in 2018 while Vipul was working in Vodafone, he made requests for SIM cards without furnishing ID for co-accused Vikas, who was residing in Pakistan at the said time and facilitated the request of sourcing the SIM cards. Copy of disclosure statement of Punit Kumar in vernacular along with English translation thereof are **Exhibit PW-28/A15** and **Exhibit PW-28/A16** respectively.

vii. The witness stated that during investigation, requests were made to the Ministry of External Affairs to obtain the foreign travel history of accused Vikas and his wife. Further, the final report/chargesheet was stated to be filed against accused Vikas, Vipul and Punit and the case is pending before the Court of Additional Sessions Judge, Sonipat. The next date of hearing is 16.11.2024 and the charge is yet to be framed. Copy of

the chargesheet in vernacular along with English translation thereof are **Exhibit PW-28/A17** and **Exhibit PW-28/A18** respectively.

viii. PW-28 on oath stated that he agreed with the conclusions of Ministry of Home Affairs regarding SFJ and its leader Gurpatwant Singh Pannun, among its other office bearers and members. The organization SFJ, despite being banned has been continuously and actively advocating for the cession of Punjab from the Union of India. Their actions are directly aimed at inciting groups and individuals within and without India to commit acts which are directly prejudicial to the security, sovereignty and territorial integrity of India. SFJ has relied upon other state and non-state actors. If the activities of the SFJ are not immediately curbed, it will likely lead to the revival of militancy in the States of Punjab, and Haryana.

51. **PW-29**

i. **PW-29 Dr. Vasudha Sood**, Sub Divisional Police Officer, Amb Tehsil, District Una, Himachal Pradesh, tendered her affidavit **Exhibit-PW-29/A**, after due authorization by the Competent Authority. She deposed regarding FIR No. 63/2023 under section under Section 153-A IPC and Section 3 of the Himachal Pradesh Open Place (Prevention of Disfigurement) Act, 1985, with Section 13 of the Unlawful Activities (Prevention) Act, 1967, later invoked vide Case Diary No. 21-A, registered at Police Station Chintpurni, Tehsil Amb, District Una, Himachal Pradesh. The case is mentioned at Serial No. 77 of Annexure II in the Reference Note. The contents of the affidavit are stated to be based on the record revealed during the investigation and on her personal knowledge acquired during six years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals, duly attested by her, and have been marked as exhibits during the course of deposition.

FIR No.63/2023, Police Station Chintpurni, Tehsil Amb, District Una, Himachal Pradesh

ii. PW-29 deposed that FIR No.63/2023 under Section 153-A IPC and Section 3 of the Himachal Pradesh Open Place (Prevention of Disfigurement) Act, 1985, Section 13 of the Unlawful Activities (Prevention) Act, 1967 was registered on the basis of complaint of one Ajay Kumar who alleged that on 29.11.2023 at 9:20 am, he noticed that something was written with black ink on the wall of Bhagta Bhai Dharamshala. In the meantime, the local people had also assembled and the police reached the spot. The words written on the wall read "***Punjab Zindabad Shaheed Bhindranwala Zindabad Khalistan Zindabad Himachal Banagaya Khalistan***". Copy of FIR No.63/2023 dated 29.11.2023 in vernacular along with English translation thereof are **Exhibit PW-29/P2** and **Exhibit PW-29/P3** respectively. Copy of initial statement of informant Ajay Kumar in vernacular along with English translation thereof are **Exhibit PW-29/P4** and **Exhibit PW-29/P5** respectively.

iii. She further deposed that ASI Mahendra Soni on reaching the spot of occurrence prepared spot map and photographs were clicked. The black ink which was used to write the slogan along with the samples was taken into possession through seizure memo for analysis. The statement of witnesses was recorded. Further, during course of investigation, CCTV footage of the nearby area was analysed and it was found that three accused involved in the incident entered "Urvashi Hotel and Restaurant" at Chintpurni. Accordingly, owner

of the Hotel Mr. Vikrant Sood was interrogated, and visitor slips along with photocopies of the Aadhaar cards of the accused, who were staying at the said Hotel were produced and taken into possession. Copy of the spot map and photograph of wall are **Exhibit PW-29/P6** and **Exhibit PW-29/P7** respectively. Copy of the seizure memo of the black spray and control sample, in vernacular and English translation thereof are **Exhibit PW-29/P8** and **Exhibit PW-29/P9** respectively. Copy of the statement of seven spot witnesses which was recorded during investigation along with English translation thereof respectively are **Exhibit PW-29/P10 (Colly.)** and **Exhibit PW-29/P11(Colly.)**. Copy of statement of Mr.Vikrant Sood (owner of “Urvashi Hotel and Restaurant”) and English translation thereof is **Exhibit PW-29/P12** and **Exhibit PW-29/P13** respectively. Copy of the seizure/production memo of visitor slips and copies of Aadhaar cards along with English translation thereof are **Exhibit PW-29/P14** and **Exhibit PW-29/P15** respectively.

iv. Witness further deposed that the CDR of mobile numbers of accused revealed that they are residents of Gauraya (Punjab). Accordingly, the police searched the area of Gauraya and accused Phool Chand s/o Sh Ram Narayan, Harry s/o Sh. Santokh Ram and Arjinder Singh @ Jinder s/o ShTaranjeet Singh were arrested. Their mobile phones were seized during investigation. Copy of CDR is **Exhibit PW-29/P16**; Copy of the arrest memo of the three accused in vernacular along with English translation thereof are **Exhibit PW-29/P17 (Colly.)** and **Exhibit PW-29/P18 (Colly.)**, respectively ;Copy of the seizure memo of the mobile phones of the three accused in vernacular along with English Translation thereof are **Exhibit PW-29/P19 (Colly.)** and **Exhibit PW-29/P20 (Colly.)**, respectively.

v. PW-29 testified that on the basis of disclosure statement of accused Phool Chand, a spray paint bottle which was used to write the slogan, was recovered. Also, the clothes and shoes of the accused, which were worn by him at the time of the incident were also taken into possession. Copy of the disclosure statement of accused Phool Chand in vernacular and English translation thereof are **Exhibit PW-29/P21** and **Exhibit PW-29/P22** respectively; Copy of recovery memo of the spray bottle in vernacular and English translation thereof are **Exhibit PW-29/P23** and **Exhibit PW-29/P24** respectively; Copy of seizure memo (clothes and shoes of the accused) in vernacular and English translation thereof are **Exhibit PW-29/P25** and **Exhibit PW-29/P26** respectively.

vi. Further, during investigation, it was found that a friend of accused,Arjinder Singh alias Jinder had sent Rs.25,000 on 27.11.2023, i.e., 2 days before the incident, through Western Union Money Transfer to Phool Chand. Mr. Survinder Pal, an agent at the Western Union Money Transfer agency located in Gauraya, Punjab was interrogated. Copy of the Western Union Transfer receipts are **Exhibit PW-29/P27**; Copy of statement of Mr. Survinder Pal recorded under Section 161 Cr.P.C. in vernacular along with its English translation thereof are **Exhibit PW-29/P28** and **Exhibit PW-29/P29** respectively.

vii. PW-29 also testified that on 05.12.2023, investigation of the case under reference was marked to her and during the course of investigation, a letter dated 08.11.2023 was issued to Western Union Money Transfer to obtain the name and address of the person who had sent Rs.25,000/- on 27.11.2023 using the Aadhaar card of accused Phool Chand. Copy of letter dated 08.12.2023 issued to the Western Union Money Transfer in vernacular along with English translation thereof is **Exhibit PW-29/P30** and **Exhibit PW-29/P31** respectively.

viii. Witness deposed that the mobile phones of the accused along with their clothes & shoes were sent to RFSL Dharamshala District Kangra Himachal Pradesh for Data Retrieval/Analysis. The same has not been received yet. The spray paint sample and bottle were also sent to RFSL Mandi for analysis. The RFSL Mandi report analysed the ink and spray bottle samples and stated that the black color paint powder recovered is consistent with the black color paint found on the wall. Copy of the RFSL Report is **Exhibit PW-29/P 32**.

ix. She further deposed that during investigation, it was found that Gurpatwant Singh Pannun, the General Counsel of the terrorist organization Sikhs for Justice had taken responsibility for writing pro-Khalistani slogans in Chintpurni Bazaar on 28th November 2023 through a viral video on social media. The video by Gurpatwant Singh Pannun was submitted as evidence in a pen drive by journalist Mr. Aman Sharma of Live Times TV. Accordingly, S.13 of the Unlawful Activities (Prevention) Act, 1967 was invoked in this case *vide* case diary No. 21-A dated 22/12/2023. Copy of the transcript of the video is **Exhibit PW-29/P33**; Copy of the Certificates u/s Section 65-B Indian Evidence Act in vernacular and English Translations thereof are **Exhibit PW-29/P34 (Colly)**; Copy of the case diary/*jimni* no.21-A dated 22/12/2023 whereupon Section 13 of Unlawful Activities (Prevention) Act, 1967 was invoked, in vernacular and English translation thereof are **Exhibit PW-29/P35** and **Exhibit PW-29/P36**, respectively.

x. She also testified that Chargesheet has been prepared against the accused Phool Chand s/o Sh. Ram Narayan r/o VPO SanghDhesian PS Goraya Tehsil Phillour, District, Jalandahar, Punjab, Arjinder Singh @ Jinder s/o ShTaranjit Singh r/o VPO Sangh PS Goraya Tehsil Phillour, District, Jalandahar and Harry s/o Sh. Santokh Singh r/o VPO Dhesian PS Goraya Tehsil Phillour, District, Jalandhar. Further, prosecution sanction is awaited u/s 196 Cr.P.C. and Section 45 of the Unlawful Activities (Prevention) Act, 1967. In furtherance of the same, correspondence has been made vide letter no. 38294 dated 23.08.2024 for obtaining the prosecution sanction. Copy of Chargesheet/Final Report dated 06.05.2024 in vernacular and English translation thereof are **Exhibit PW-29/P37** and **Exhibit PW-29/P38** respectively and copy of letter dated 23.08.2024 is **Exhibit PW-29/P39**.

xi. PW-29 has also tendered an additional affidavit **Exhibit PW-29/B**, for the purpose of placing on record copy of the concerned viral video. Copy of the viral video prepared through FSL in a pen drive is **Exhibit PW-29/P40**. The true copy of the transcript of the video is **Exhibit PW-29/P33**.

xii. PW-29 further deposed that she agreed with the conclusions of Ministry of Home Affairs regarding SFJ and its leader Gurpatwant Singh Pannun, among its other office bearers and members. The organization SFJ, despite being banned has been continuously and actively advocating for the cession of Punjab from the Union of India. The actions are directly aimed at inciting groups and individuals within and outside India to commit acts, which are directly prejudicial to the security, sovereignty and territorial integrity of India. SFJ has relied upon other state and non-state actors. If the activities of the SFJ are not immediately curbed, it will likely lead to the revival of militancy in the concerned States.

52. PW-30

i. **PW-30 Dr. Amar Singh, Inspector, officiating SHO, Police Station Cyber Crime, CID, Shimla,** tendered his affidavit **Exhibit PW-30/P1**, after due authorization by the Competent Authority. He deposed

that he is the Supervisory Officer of FIR No. 04/2021 dated 31.07.2021, under Sections 124, 153A, 120B, and 506 of IPC; Section 13 of the Unlawful Activities (Prevention) Act, 1967; and Section 66-C of the Information Technology (Amendment) Act, 2008, registered at Police Station Cyber Crime, CID, Shimla, mentioned at Serial No. 72 of Annexure II to the Reference Note/Background Note. The contents of the affidavit are stated to be based on record revealed during the investigation conducted in the said case and on his personal knowledge acquired during 38 years of service as a Police Officer.. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No.04/2021, Police Station Cyber Crime, Southern Range, District- Shimla

ii. PW-30 deposed that FIR No.04/2021 was registered at Police Station Cyber Crime, Southern Range, District-Shimla after a complaint was received by email from Shri Baldev Singh Chauhan, Editor Himalayan Dawn news magazine whereby he informed that he had received a call from mobile number +442039061459 on his mobile number 9418168686at 10:54 am, in which the following message was played: "***We will not allow Sh. Jai Ram Thakur, Chief Minister of Himachal Pradesh to host the Tricolour on 15th August. Because Himachal is part of Punjab and Punjab is Khalistan***". He further clarified that while registering the FIR, the name of the accused was wrongly reflected as Avtar Singh Pannun in place of Gurpatwant Singh Pannun, due to which report no.10 dated 31.07.2021 in the daily diary of Cyber PS SR Shimla was registered. Copy of FIR No.04/2021 is **Exhibit PW-30/P2** and Copy of GD no.10 dated 31.07.2021 in the daily diary is **Exhibit PW-30/P3**.

iii. He further testified that during investigation, it was found that Gurpatwant Singh Pannun had made such threat messages by way of audio recordings to other journalists as well. On 30.07.2021, journalist Shri Amit Kanwar, also received audio recorded threat messages on his mobile number. These audio clips were recorded and copied in a CD. In one of the said audio clips dated 30.07.2021 the speaker addressed himself as Gurpatwant Singh Pannun, General Counsel of Sikhs For Justice ('SFJ') and said that "*Eh "Sneha" Sikh for Justice General Council Gurpatwant Singh Pannu in Washington DC. Himachal Pradesh was part of Punjab and we are seeking a referendum in Punjab. Once we liberate Punjab, we take over Himachal areas which was part of the Punjab. I ask all farmers and pro-Khalistani Sikhs to come out, bring their tractor and stop Jai Ram Thakur from hosting Indian tricolor.*" this is for Himachal government. On August 15 we will not let Jai Ram Thakur hoist the Indian Tricolor".

iv. In the other audio recording received by Amit Kanwar on 02.08.2021, the following message as per transcription was received:

"BJP President Nadda, Nadda you are personally responsible for the deaths of the thousands of farmers because you are president of the BJP is responsible for this anti-farm laws. You all are trying to raise the security of Tiranga under the Himachal Police but I want to remain you that even Punjab CM, Beant had security but SSA believes in ballots not bullets. SSA is peaceful and democratic organization. I ask the people of Himachal to stay home and stay safe on August 15 and the farmers should bring tractors to stop

BJP President, Nadda and CM Thakur from raising Tiranga. The message is from Gurpatwant Singh Pannu, General Council, Sikhs for Justice from DC.”

v. He deposed that on 30.07.2021 Mohan Lal Verma received an audio-recorded message on his mobile number 9318987565 from mobile number 13094605079. According to the transcription, the message stated the following:

“Eh ‘Sneha’ Sikh for justice General Council Gurpatwant Singh Pannu in Washington DC. Himachal Pradesh government was a part of Punjab and we are demanding a referendum in Punjab. Once we liberate Panjab, we will ensure that we capture the areas of Himachal which were part of the Punjab. I ask all farmers and pro-Khalistan Sikhs to come out, bring their tractor and stop Jai Ram Thakur from hosting Indian Tricolor”.

Seizure Memos of CD of one audio clipping pertaining to Mr. Mohan Lal Verma as received on his mobile number 9318987565 and CD containing admitted voice of Gurpatwant Singh Pannun as uploaded are collectively **Exhibit PW-30/P4** and translation of the said seizure memos is **Exhibit PW-30/P5 (Colly)**. The copy of the transcript of the audio recorded messages is **Exhibit PW-30/P7**. The message as received by Mr. Baldev Singh Chauhan (original complainant) is at point A; messages received by Mr. Amit Kanwar are at point ‘B’ and ‘D’ and message as received by Mohan Lal Verma is at point ‘C’ in **Exhibit PW-30/P7**. Statement of witnesses was also recorded during investigation and copy of the same in vernacular along with English translation thereof are respectively **Exhibit PW-30/P8 (Colly.)** and **Exhibit PW-30/P9 (Colly.)**. Copy of the certificates under Section 65B of the Indian Evidence Act are **Exhibit PW-30/P10 (Colly.)**. Copy of the letter dated 04.08.2021 along with SFSL Report dated 28.08.2021 confirming that the acoustic features and other spectral details in the questioned voice of Pannun is similar to the admitted voice of Gurpatwant Singh Pannun are **Exhibit PW-30/P11** and **Exhibit PW-30/P12** respectively.

vi. PW-30 testified that a Final Report/Untrace Report has been prepared and filed before the concerned Court, which is pending consideration. Copy of the Final Report in vernacular along with English translation thereof are **Exhibit PW-30/P13** and **Exhibit PW-30/P14** respectively.

vii. PW-30 has tendered an additional affidavit marked as **Exhibit PW-30/B** to place on record a true copy of audio-recorded clips contained in four separate CDs, each sealed with the seal of the Forensic Science Laboratory (FSL). These CDs were prepared through the FSL and collectively marked as **Exhibit PW-30/P6 (Colly)**. The transcription of the audio messages contained in each CD is referenced on the envelopes holding the CDs, labeled as Parcel No.1 to Parcel No.4, and marked as **Exhibit I** to **Exhibit IV**. Parcel No.4/**Exhibit IV** contains an audio clip of the admitted voice of Gurpatwant Singh Pannun, which was downloaded from the URL mentioned on Parcel No.4/**Exhibit IV**.

viii. PW-30 stated on oath that he agreed with the conclusions of Ministry of Home Affairs regarding SFJ and its leader Gurpatwant Singh Pannun, among its other office bearers and members. The organization SFJ, despite being banned has been continuously and actively advocating for the cession of Punjab from the Union of India. The actions are directly aimed at inciting groups and individuals within and without India to commit

acts which are directly prejudicial to the security, sovereignty and territorial integrity of India. If the activities of the SFJ are not immediately curbed, it will likely lead to the revival of militancy in the concerned States.

53. PW-31

i. PW-31 Pranab Kumar Pegu, Additional Superintendent of Police, STF Assam, Guwahati, tendered his affidavit Exhibit PW-31/A, after due authorization by the Competent Authority. He deposed that he is the Investigating Officer of FIR No. 02/2023 dated 02.04.2023 under Sections 121, 124A, 506 IPC, and Sections 10, 13, 16, 18 of the Unlawful Activities (Prevention) Act, 1967, registered at Police Station Special Task Force (STF), Assam, District Kamrup (M), Assam, and FIR No. 03/2023 dated 25.04.2023 under Sections 120B, 121, 124A, 506 IPC, and Sections 10, 13, 16, 18, 20 of the Unlawful Activities (Prevention) Act, 1967, registered at Police Station Special Task Force (STF), Assam, District Kamrup (M), Assam which are mentioned at Serial Nos. 79 and 80 of Annexure II in the Reference Note. The contents of the affidavit are stated to be based on record revealed during the investigation conducted in the said cases and on his personal knowledge acquired during 14 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No.02/2023, Police Station Special Task Force (STF), Assam, District Kamrup (M), Assam

ii. PW-30 deposed that FIR No.02/2023 dated on 02.04.2023 under sections 121, 124A, 506 IPC and Sections 10, 13, 16, 18 of the Unlawful Activities (Prevention) Act, 1967 was registered on a complaint of Badan Singpho, Inspector of Police, Special Task Force Police Station Assam, Guwahati, Kamrup (M), whereby he informed that a voice message by Gurpatwant Singh Pannun, who is the Chief of Sikhs for Justice, which is a proscribed organization in India, is in circulation in the social media. He further informed that in the said message, it has been declared that the SFJ's avowed objective is the secession of Punjab from India. Further, life threats have been issued to Dr. Himanta Biswa Sarma, Chief Minister of Assam. He further stated in the information that the purpose of circulation of the audio file appears to be to stir up sentiments of the Sikhs to fight for secession from India and wage war against the State and to revert back to Khalistan terrorist activities in 1980/1990. The same further appear to be part of preparation for waging war against the State.

iii. He deposed that the abovesaid audio message went viral on social media and news channels. Therefore, the complainant downloaded the said audio message in CD from social media/news channel and the same was seized. He stated that as per the audio recording, threats were extended to the Chief Minister (Dr. Himanta Biswa Sarma) to the effect that if his Government is going to torture and harass Sikhs, he will be held accountable. The audio clipping has been downloaded on a CD on 02.04.2023 and the seizure memo bears the signatures of Chief Judicial Magistrate dated 03.04.2023 (*seen*) when the same was produced before the concerned Magistrate. Copy of FIR No.02/2023 dated 02.04.2023 is **Exhibit PW-31/P1**; Copy of the seizure memo of CD containing the audio clipping is **Exhibit PW-31/P2** and the copy of the original CD is contained in a pen drive and the same is **Exhibit PW-31/P3**.

iv. He further testified that during investigation, statements of three witnesses namely Badan Singpho, Dhruvajyoti Pathak and Partha Deb Goswami were recorded u/s 161 Cr.P.C. The said witnesses stated that Gurpatwant Singh Pannun, Chief of SFJ circulated a voice message amongst and made phone calls to several print and electronic media personnel of Assam, wherein the speaker issued a message vowing the secession of Punjab from India and also issued life threats to the Chief Minister of Assam. Copy of statements of complainant Badan Singpho, Dhruvajyoti Pathak and Partha Deb Goswami recorded under Section 161 Cr.P.C. are **Exhibit PW-31/P4**, **Exhibit PW-31/P5** and **Exhibit PW-31/P6** respectively.

FIR No. 03/2023, Police Station-Special Task Force (STF), Assam, District Kamrup (M), Assam

v. PW-31 deposed that FIR No. 03/2023 dated 25.04.2023 under Sections 120B, 121, 124A, 506 IPC, and Sections 10, 13, 16, 18, 20 of the Unlawful Activities (Prevention) Act, 1967 was registered at Police Station Special Task Force (STF), Assam, District Kamrup (M), Assam on complaint of Biju Das, Inspector of Police, Special Task Force Police Station Assam, Kamrup (M), Guwahati. He informed that a voice message by Gurpatwant Singh Pannun, was circulating on social media platform/news channels, wherein Gurpatwant Singh Pannun alleges that Dr. Himanta Biswa Sarma would be held accountable for joining hands with the enemies of Khalistan. He also vowed that the Sikhs, who are presently in prison in Dibrugarh, will commemorate, April 29 as Khalistan Declaration Day by raising 'Khalistan Zindabad' slogan. Further, in the same message, he extended threats to hold the Hon'ble Prime Minister of India Shri Narendra Modi accountable in Sydney, Australia on May 23rd for Crime against pro-Khalistan Sikhs. He further referred in the audio clipping to the incidents of ex-Punjab CM Beant Singh and ex-Indian Prime Minister Indira Gandhi. Further, it was reiterated that they would liberate Punjab and eliminate Indian system not with bullet but with ballot.

vi. He further deposed that the abovesaid audio message went viral on social media and news channels and the complainant downloaded the same from social media/news channel in a pen drive and was seized. Copy of FIR No.03/2023 dated 25.04.2023 is **Exhibit PW-31/P7**; Copy of the seizure memo is **Exhibit PW-31/P8** and Pen drive containing the copy of the voice message seized through the above seizure memo is **Exhibit PW-31/P9**.

vii. He further deposed that during investigation, statements of two witnesses namely, Biju Das (complainant) and Dibya Kamal Bordoloi were recorded u/s 161 Cr.P.C wherein they stated that Gurpatwant Singh Pannun, Chief of SFJ circulated a voice message amongst several print and electronic media personnel of Assam, wherein the speaker vowed the secession of Punjab from India and also held Shri Narendra Modi, Hon'ble Prime Minister of India and Dr. Himanta Biswa Sarma, Chief Minister of Assam accountable for crime against pro-Khalistan Sikhs. Copy of statements of complainant Biju Das and Dibya Kamal Bordoloi recorded under section 161 Cr.P.C. are **Exhibit PW-31/P10** and **Exhibit PW-31/P11** respectively.

Investigation in both the cases is stated to be underway and the accused are yet to be arrested.

viii. PW-31 further stated on oath that he agreed with the conclusions of Ministry of Home Affairs that SFJ and its leader Gurpatwant Singh Pannun, among other office bearers and members, despite being banned has been continuously and actively advocating for the cession of Punjab from Union of India. Their actions are directly aimed at inciting groups and individuals within and outside India to commit acts which are

directly prejudicial to the security, sovereignty and territorial integrity of India. If the activities of the SFJ are not immediately curbed, it will likely lead to the revival of militancy in the States of Punjab, and Haryana.

54. PW-32

i. PW-32 Narinder Singh, Superintendent of Police, City, Bathinda, tendered his affidavit **Exhibit-PW-32/A**, after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR Nos. 91/2022, 55/2024, and 89/2022(mentioned at Serial No. 39 of Background Note) registered in Punjab. He clarified that FIR Nos. 91/2022 and 55/2024 are newly added and have not been reflected in the Background Note. The contents of the affidavit are stated to be based on record revealed during the investigation and on his personal knowledge acquired during 10 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No.91/2022, PS-Thermal, Bathinda, Punjab.

ii. PW-32 deposed that FIR No.91/2022 dated 02.10.2022 u/s 153-B IPC, PS-Thermal, Bathinda was registered against unknown persons on the receipt of information by ASI Karamjit Singh where he informed that he along with Ct. Sarabjit Singh 1350 and PHG Gurjinder Singh 10320 were on a private vehicle at Gate No.1, Thermal Colony, Joga Nand Road, Bathinda, whereupon, Ct. Sarabjit Singh informed that he had received an information from an informer that to create hatred among the different religion and creed, some miscreants had written Hindustan Murdabad, Muslim Sikh Bhai Bhai, SFJ and Khalistan-Pakistan Jindabad. Further, SJF slogans were written in black colour ink at wall of forest department, near Papiha Palace, Joganand Road. After finding the information credible and reliable, the FIR was accordingly registered.

Copy of FIR in vernacular is **Exhibit-PW-32/P1** and English Translation thereof is **Exhibit-PW-32/P2**.

iii. He further deposed that during course of investigation, DDR No. 19 dated 19.10.2022 was recorded, whereby, C. Ravinder Preet Singh informed ASI Mukhtiyar Singh that he received information that on the Malout Road, opposite Thermal Plant, under the over bridge on the walls of room just close to the railway track some Khalistani slogans were written. Further, in this regard a video was stated to be viral on social media in which Gurpatwant Singh Pannun was found saying that so far Interpol Assembly is going on, the team of Khalistan have raised right in Gurunanak Dev Thermal, Bhatinda, Thank you Interpol-SFJ, Hindustan Murdabad, Khalistan and Pakistan Jindabad. Also, in the said video Khalistan Jindabad and Hindustan Murdabad is shown in the video. As such, it was recorded in the said DDR No. 19 that it is clear that the slogans have been got written by Chief of SFJ Gurpatwant Singh Pannun against various religions in order to separate them and to disturb peace of Punjab. Offence u/s 153B, 120B IPC and Section 3 Punjab Prevention of Damage to Public and Private Property Act, 2014, Section 66F, Section 67 Information Technology Act, 2000 was found to have been committed. Copy of General Diary Details No.19 is **Exhibit-PW-32/P3** and English Translation thereof is **Exhibit-PW-32/P4**.

iv. He further testified that a complaint No.603/Kotwal/2022 dated 4.10.2022 submitted by Siv Sewa Hind was also received during course of investigation. On the basis of said complaint, the Chief of SFJ Gurpatwant Singh Pannun s/o Mahinder Singh r/o Khankot, Distt. Amritsar was also arrayed as an accused. Further, accused Rajwinder Singh s/o Jarnail Singh s/o Jodh Singh r/o Godara, Distt. Faridkot and Pritpal Singh s/o Gurlal Singh s/o Harbans Singh r/o Village- Doda, Distt. Faridkot, were also arrayed as accused as referred in DDR No.27 dated 14.09.2023. Accordingly, Section 13 of the Unlawful Activities (Prevention) Act, 1967 was also invoked as referred in the chargesheet.

He deposed that final report/chargesheet was presented on 12.09.2024 against accused Rajwinder Singh and Pritpal Singh. Copy of DDR No.27 dated 14.09.2023 is **Exhibit PW-32/P5** and English Translation thereof is **Exhibit PW-32/P6**. Copy of final report/chargesheet in vernacular is **Exhibit PW-32/P7** and English Translation thereof is **Exhibit PW-32/P8**.

The case is stated to be pending trial.

FIR No.89/2022, PS-Dayalpur, District-Bathinda

v. In respect of FIR No.89 dated 07.07.2022 under Sections 10, 13,18 UAPA and Section 153B, 120B IPC registered at PS-Dayalpur, District-Bathinda, PW-32 deposed that on 07.07.2022, SI Harbant Singh 511/PR, Incharge, Post-Bhagta along with HC Gurdeep Singh 1C/313, C. Gagandeep Singh 948/Bathinda, PHG Nirpal Singh 22111, PHG Mejoor Singh 21999 were patrolling, whereupon statement of ASI/LR Balveer Singh 1061/BTI, Incharge of Police Party at Dera Salabatpura was recorded. ASI/LR Balveer Singh stated that on 06.07.2022, in the evening the Dera discourse was attended by 500 devotees and concluded about 12.00 AM. After conclusion of discourse, he along with police party conducted checking of Dera and were positioned in night at Dera. In morning at around 7.00 am, he along with police party conducted checking of Dera in routine manner and found that on wall of Dera, towards Barnala, it was written in black "**Punjab Hal Khalistan SFJ**" and on the wall towards Burj Rajgarh, it was written with black ink **Beadbi da hal Khalistan SFJ, Badla Lawange 26 January, referendum one crore**. Further, on the road side, which is going from Bhakta-Barnala main road to village Dulewala, it was written with black ink **Khalistan Jindabad, Sri Guru granth Sahib, Badla Lawange, SFJ**. He further stated that he came to know that on social media a person named Gurpatwant Singh Pannun, Chief, SFJ, who is associated with Khalistan movement had uploaded one video in which Pannun claimed that above said writings were written by his associates on the walls of Dera Sacha Sauda, Salabatpura. He deposed that in this way Gurpatwant Singh Pannun and his associates had disturbed the peace and tranquility in the State of Punjab and tried to break the Sovereignty of Indian nation and tried to advocate making of Khalistan.

Copy of FIR is **Exhibit PW-32/P9** and English Translation thereof is **Exhibit PW-32/P10**.

vi. Witness further testified that during the course of investigation, on the basis of statement of Harcharan Singh s/o Jaswant Singh, accused Amrit Pal Singh @ Amrit Gill son of Paramjit Singh r/o Dullewala, District Bathinda was arrayed as an accused, vide DDR No.35 dated 30.11.2023. Accused Amrit Pal Singh was arrested after obtaining production warrant. True copy of DDR in vernacular is **Exhibit PW-32/P11** and English translation thereof is **Exhibit PW-32/P12**. The chargesheet is stated to have been filed in which Gurpatwant Singh Pannun also stands arrayed as an accused. He further stated that an LOC stands issued

against Gurpatwant Singh Pannun for his arrest in the said case. True copy of chargesheet in vernacular is **Exhibit PW-32/P13** and English translation thereof is **Exhibit PW-32/P14**.

FIR No. 55/2024, PS-Civil Lines, Bathinda

vii. PW- 32 deposed that FIR No. 55/2024, under Sections 153B IPC was registered at PS-Civil Lines, Bathinda, on 27.04.2024. ASI Sukhdarshan Kumar, along with HC Jagdeep Singh (No. 2184/BTI), S/Ct Manjeet Singh (No. 1968/BTI), and PHG Khuskaran Singh (No. 10419), were on patrol duty near the children's park in Bathinda, when an informant reported that unknown individuals had written slogans with black ink on the wall of the Mini Secretariat, opposite the Women's Police Station, and on the wall of the court complex in Bathinda. These writings were allegedly intended to disturb the peace and tranquility of the state. Based on this credible information, an FIR was registered against the unknown individuals.

Copy of FIR in vernacular is **Exhibit PW-32/P15** and English translation thereof is **Exhibit PW-32/P16**. Pictures of slogans, which were written on the wall in the Black ink, are **Exhibit PW-32/P17** and **Exhibit PW-32/P18**.

viii. He further deposed that on the basis of statement of Kulwinder Singh s/o Amar Singh r/o Kacha Dhobiana, Bathinda, accused namely, Gogi Singh s/o Tarsem Singh r/o Jeevan Singh, now LIC, Phase-1, Model Town, Bathinda, Jeni s/o Jeeta Ram r/o Jeevan Singh Wala and Prit Pal Singh were nominated as accused, vide DDR No. 43 dated 08.05.2024. Section 120-B IPC was added and on the same day accused Jeni Ram was arrested.

Copy of DDR No.43 dated 08.05.2024 in Vernacular is **Exhibit PW-32/P19** and English translation thereof is **Exhibit PW-32/P20**.

ix. PW-32 deposed that on 14.05.2024, accused Gogi Singh was arrested. Pripal Singh was also arrested after obtaining production warrant. During the course of interrogation accused Gogi Singh and Pripal Singh revealed the name of the accused Gurdas Singh s/o Harjinder Singh r/o Bahiman Jassa Singh wala, PS-Talwandi Sabo, Distt. Bathinda, vide DDR No. 30 dated 15.05.2024. Copy of DDR No.30 dated 15.05.2024 in Vernacular is **Exhibit PW-32/P21** and English translation thereof is **Exhibit PW-32/P22**.

x. He deposed that accused Gurdas Singh @ Jassa Singh was arrested on same day and on his disclosure, accused Randeep Singh @Deep s/o Ranjit Singh r/o Balla Patti, Nathana and Gurpreet Singh @ Kaku s/o Pappu Singh r/o Garind Basti, Nathana were nominated as accused and arrested on same day, vide DDR No.42 dated 15.05.2024. Copy of DDR No.42 dated 15.05.2024 in vernacular is **Exhibit PW-32/P23** and English translation thereof is **Exhibit PW-32/P24**.

xi. The witness also deposed that accused Gurpatwant Singh Pannun s/o Mohinder Singh, now resident of USA along with other accused has been arrayed as accused vide DDR No. 42 dated 17.05.2024. The true copy of DDR No.42 dated 17.05.2024 in vernacular is **Exhibit PW-32/P25** and English translation thereof is **Exhibit PW-32/P26**. He further stated that Arrest Warrant and LOC against the accused Gurpatwant Singh Pannun s/o Mohinder Singh have already been issued in accordance with law. The accused is currently residing at USA and is operating his illegal and antinationalist activities in Punjab region from there in order to disturb the peace and tranquillity

The case is stated to be under investigation.

xii. PW-32 testified that all the aforesaid three FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely and as such he was of the view that if the ban to the SFJ is not extended and its activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

55. PW-33

i. PW-33 Gurpartap Singh Sahota, PPS, Superintendent of Police (Investigation), Batala, District Gurdaspur, Punjab, tendered his affidavit **Exhibit-PW-33/A**, after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No. 46 of 2018, registered at Police Station Rangar Nangal; FIR No. 77 of 2022, registered at Police Station Dera Baba Nanak; and FIR No. 10 of 2024, registered at Police Station City Batala, Police District Batala, Punjab (mentioned at Serial Nos. 4, 38, and 55 of the Background Note). The contents of the affidavit are stated to be based on the record revealed during the investigation and on his personal knowledge acquired during 10 years of service as a Police Officer. The documents annexed to the affidavit are stated to be true copies of the respective originals, duly attested by him and have been marked as exhibits during the course of deposition.

FIR No.46/2018, Police Station: Rangar Nangal

ii. PW-33 deposed that FIR No.46 dated 31.05.2018 u/s 307/438/427/148/149 IPC, was registered at Police Station: Rangar Nangal on the statement of Sartaj s/o Kunj Lal, a Rajput resident of Bandaru, Police Station: Jawali, District Kangra, Himachal Pradesh, currently working at a wine shop (English Wine Adda Dhandoi), under the jurisdiction of Police Station: Rangar Nangal. Sartaj stated that on the night of May 30, 2018, after closing the Wine Shop at around 10:30–11:00 PM, he stayed overnight at the shop as usual. At approximately 3:30 AM on May 31, 2018, unknown persons set fire to the Wine Shop by sprinkling petrol. However, Sartaj managed to escape the flames and save his life. The attackers fled the scene after the incident. Sartaj further stated that unknown persons had attempted to kill him by setting the shop on fire and causing damage to the property. Sections 11/12/13, 17/18 of the Unlawful Activities (Prevention) Act, 1967, Section 25 Arms Act and Section 66A, 66F Information Technology Act, 2000 were subsequently invoked along with Sections 121A, 122, 124A, 115, 120B IPC.

iii. He further deposed that during investigation, on May 31, 2018, at approximately 5:20 AM, while conducting a checkpoint operation at Adda Achal Sahib, Inspector/SHO Harkrishan Singh along with ASI Surjit Singh, HC Waryam Singh (No. 3280), HC Hardev Singh (No. 2016), HC Prem Singh (No. 1509) and PHG Amrik Singh (No. 1750) accompanied by driver HC Jatinderpal Singh (No. 1728) met Sartaj, who reiterated his statement. Copy of FIR in vernacular is **EXHIBIT PW-33/P1** and English translation thereof is **EXHIBIT PW-33/P2**.

iv. He testified that during the investigation, it was revealed that Dharminder Singh (S/O Sarbjit Singh, R/O Harpura, PS Ghuman), who was on leave from his duties in the army, and Kirpal Singh (S/O Karnail Singh, R/O Fatehpur, PS Valtaha, District Tarn Taran) had direct links to radical Sikh organizations and unlawful groups. He stated that these individuals were suspected of providing financial aid to these groups and were involved in activities such as arson and disseminating Khalistan propaganda. Subsequently, a raid was conducted at Dharminder Singh's residence, which led to the arrest of both individuals. During the search, several items were seized, including:

- A 0.22 bore pistol with three live rounds of 0.32 bore ammunition from Kirpal Singh.
- From Dharminder Singh's residence, we recovered a 0.32 bore revolver, three live rounds of 0.32 bore ammunition, and two rounds of 0.315 bore ammunition. In addition, ₹40,000 in cash was seized, along with 110 posters labeled "*Sikhs for Justice*", three stencils with "*Khalistan Zindabad*", a board and fiber sheet reading "*Punjab Referendum 2020*", as well as spray cans, brushes, and two mobile phones (a Samsung and an Oppo).

v. He deposed that during their interrogation, the accused confessed their involvement with the Punjab Referendum 2020 initiative. They admitted to having been in contact with Maan Singh Khalsa, a resident of the UK, who instructed them to paste Khalistan-related posters and carry out unlawful acts like arson.

vi. Further, on June 4, 2018, in the presence of DSP Sucha Singh, Dharminder Singh further confessed that he was working under the instructions of Gurpatwant Singh Pannu (USA), who leads the Punjab Referendum 2020 Group. Dharminder revealed that Pannun, along with Parmjit Singh Pamma (UK) and Deep Kaur (Malaysia), encouraged arson attacks and planned targeted killings to disrupt law and order in Punjab. He disclosed that they had specifically directed him to target Hindu Shiv Sena leaders, RSS shakhas, and other organizations opposed to Khalistan. Moreover, Pannun and his associates provided financial support and weapons to carry out these activities.

vii. PW-33 deposed that based on this confession, Gurpatwant Singh Pannun, Parmjit Singh Pamma, and others were named as accused under Sections 17 and 18 of the Unlawful Activities (Prevention) Act, 1967, recorded in GD No. 51 dated June 4, 2018. Further, on September 4, 2018, Nirmal Singh and Harnam Singh were arrested, and four mobile phones were recovered. Additionally, another accused, Ravinder Singh Raja, confessed that weapons used in their activities had been sourced from Ravi (Ravipreet Singh, R/O Umarpura).

viii. He testified that during the course of investigation, the call detail records revealed that accused Dharminder Singh was part of 36 WhatsApp groups involving members from India and abroad including the members from Babbar Khala and other radical organizations. Further, on May 24, 2018 a telegram video call between Dharminder and Ranjeet Singh Rana (UK) was discovered where plans to disturb law and order in Punjab were discussed. This call was recorded and added to the case file as evidence. Further interrogation revealed plans by Dharminder Singh and Kripal Singh to assassinate prominent individuals including Sudhir Kumar Suri Hindu, President Shiv Sena and other leaders such as Navdeep Gupta (Kharar) Chandrakant Chadha (Ludhiana) and Ranjeet Kumar (Gurdaspur). The directives were issued vide leaders of Babbar Khalsa International and Khalistan Referendum 2020.

As per GD No. 35 dated June 12, 2018, additional accused were named, including Ranjit Singh Rana (USA), Amritpal Singh (India), Parmjit Singh Pamma (UK), Maan Singh Khalsa (UK), and Deep Kaur (Malaysia). Their activities involved plotting attacks, spreading propaganda, and creating disruptions to further the Khalistan agenda.

ix. PW-33 also deposed that Dharminder Singh also confessed that Maan Singh (UK) had arranged for ₹60,000–₹65,000 to be sent to Harnam Singh (R/O Chakrala, PS Kartarpur, District Jalandhar). On May 27, 2018, Dharminder and Kirpal Singh collected ₹63,000 from Nirmal Singh at Jandiala Bypass. Based on this confession, Nirmal Singh and Harnam Singh were named as accused in the case.

x. He deposed that since some of the accused including Gurpatwant Singh Pannun and Maan Singh, are residing abroad and have not been arrested, they have been placed in Column 3 of the chargesheet, and the initiation of extradition proceedings and issuance of Red Corner Notices against them requires the filing of the challan.

He further testified that during the course of investigation, accused Kirpal Singh s/o Karnail Singh, Harnam Singh and Nirmal Singh @ Nimma were arrested and the articles recovered at their instance/possession were taken into possession vide separate recovery memos. True copy of the Recovery Memos along with English translation thereof is **EXHIBIT PW-33/P3 (Colly)** and True copy of five Disclosure Memos of accused Ravinder Singh, Dharminder Singh and Kripal Singh along with English translation thereof is **EXHIBIT PW-33/P4 (colly)**.

Vernacular copy of the main chargesheet is **EXHIBIT PW-33/P5** and English translation thereof is **EXHIBIT PW-33/P6**. True copy of order dated 01.12.2018 passed during the course of proceedings is **EXHIBIT PW-33/P7** and order dated 28.01.2020 of the Trial Court is **EXHIBIT PW-33/P8**. True copy of charge framed by the learned Trial Court Gurdaspur on 01.06.2019 is **EXHIBIT PW-33/P9**.

FIR No. 77/2022, Police Station Dera Baba Nanak

xi. PW-33 further deposed that FIR No.77 dated 4.7.2022 under Section 153B IPC was registered at Police Station Dera Baba Nanak on a statement given by SI/SHO, who reported that he, along with SI Kailash Chander (2966/BTL), ASI Afrik Singh (2331/BTL), ASI Kabal Singh (3332/BTL), ASI Malkeet Singh (3248/BTL), PHC Sukhwinder Singh (2023/BTL), and Constable Manjit Singh (1744/BTL), were on patrol duty in a government vehicle (No. PB-65-BA-8125) driven by ASI Satinderpal Singh (1864/BTL). They were conducting check for suspicious activities and monitoring a Naka at Adda Kahlawali Chowk. During patrol, SI/SHO received information that on the night of July 3–4, 2022, provocative posters were pasted on the outer wall of the SDM Office in Dera Baba Nanak and on a pillar at the Bus Stand in Dera Baba Nanak. The posters, written in Punjabi in black marker on white paper, contained the following text:

“Khalsa Raj Sant Baba Jarnail Singh Bhindranwale Punjab da Asli Haq Khalistan Zindabad Hindustan Murdabad Sikh Kom Jeundi Aa Badla Lavegi”

(“Khalsa Raj Saint Baba Jarnail Singh Bhindranwale is Punjab’s true claim. Long live Khalistan, down with Hindustan. The Sikh community is alive and will seek revenge.”)

xii. He testified that according to the information, these posters were instigated by Gurpatwant Singh Pannun, who resides abroad and claims to be the Chief of SFJ. Further, Gurpatwant Singh Pannun is alleged

to mislead people through provocative speeches on social media, encouraging them to spread such messages. His actions, along with those of other corrupt elements, are believed to incite hatred and disrupt public harmony. Thereafter, acting on this information, the SHO and his team visited the SDM Office and Bus Stand and removed the posters and seized them. He stated that the posters were allegedly intended to disturb the unity and integrity of the nation, incite hatred among the public, and disrupt peace.

The investigation in the instant FIR is stated to be underway.

True copy of FIR in vernacular is **EXHIBIT PW-33/P10** and English translation thereof is **EXHIBIT PW-33/P11** and True copy of Seizure Memo along with English translation thereof is **EXHIBIT PW-33/P12**.

FIR No.10/ 2024, Police Station City Batala

xiii. PW-33 deposed that FIR No.10 dated 31.01.2024 was registered at Police Station City Batala on statement of SI/SHO, who reported that he, along with LR/ASI Rajiv Kumar (No. 2364/BTL), HC Pawandeep Singh (No. 1686/BTL), and Ct Amandeep Kumar (No. 2495/BTL), were on patrol duty and monitoring for suspicious activities in a government vehicle bearing registration No. PB-06-M-0649, driven by LR/ASI Naresh Pal (No. 2561/BTL). While stationed at Nehru Gate, Batala, they received secret information that two young individuals on a black-colored Activa scooter had pasted posters reading "Khalistan Zindabad" on the walls of Chakri Bazar, Batala, at approximately 12:30 PM. He stated that the said act had caused public unrest, with people gathering at the location, expressing anger, and feeling a sense of threat, thereby escalating tensions among different groups. Acting on this information, SHO and his team visited Chakri Bazar, Batala, and recovered four white posters with the phrase "*Khalistan Zindabad*" written in Punjabi in black ink. These posters were taken into police possession, sealed in separate envelopes marked "S.S." for evidence.

xiv. He testified that upon reviewing CCTV footage from Chakri Bazar, the officers observed two Sikh youths riding a black Activa scooter. One appeared to be around 18-19 years old, and the other around 25-26 years old. Local residents identified the older individual as Balwinderjit Singh, son of Harjit Singh, a resident of Bouli Inderjit, Batala. It was alleged that Balwinderjit Singh, along with his younger associate, acted with common intent to paste the posters and thereby committed an offense under Sections 153-A and 34 of the IPC. Both accused were arrested on January 31, 2024, and subsequently granted bail on February 1, 2024, and February 10, 2024, respectively.

The case is stated to be under investigation.

xv. True copy of FIR in vernacular is **EXHIBIT PW-33/P13** and English translation thereof is **EXHIBIT PW-33/P14**; True copy of Arrest Memo along with English translation thereof is **EXHIBIT PW-33/P15**; True copy of Seizure Memos along with English translation thereof is **EXHIBIT PW-33/P16 (Colly)** and True copy of Disclosure Memo of Balwinderjit Singh along with English translation thereof is **EXHIBIT PW-33/P17**.

xvi. PW-33 stated on oath that all the said 3 FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was extended by Ministry of Home Affairs vide notification dated 08.07.2024 are continuously indulging in cession and secessionist activities in a clandestine manner and as

such he was of the view that if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

56. PW-34

i. **PW-34 Jasmeet Singh Sahiwal**, PPS, Superintendent of Police (PBI & Investigation), Faridkot, tendered his affidavit **Exhibit-PW-34/A**, after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No. 201 dated 11.06.2022, under Sections 153-A, 153-B, 120-B IPC, and Section 3 of the Prevention of Defacement of Property Act, 1985, registered at Police Station City Faridkot, Punjab, mentioned at Serial No. 32 of the Background Note. The contents of the affidavit are stated to be based on record revealed during the investigation and on his personal knowledge acquired during 10 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 201/2022, Police Station: City Faridkot, Punjab

ii. PW-34 testified that FIR No.201 dated 11.06.2022u/s 153-A/153-B/120-B IPC, Section 3 Prevention of Defacement of Property Act 1985, Police Station City Faridkot, Punjab was registered on the complaint of DSP (S.D.) Sh. Azad Davinder Singh. He stated that as per the FIR, on 11.06.2022, Sh. Azad Davinder Singh DSP (S.D) FDK along with his gunmen and Reader Staff was proceeding to his office on vehicle No. PB04-V-3238, whereupon, on the way near the Civil Hospital Faridkot, an informant got the vehicle stopped and informed that an activist of Sikhs For Justice had written slogan "Khalistan Jindabad" with black ink on the wall below the flyover on the Talwandi Road, Faridkot. Thereafter, said Informant showed one video on his mobile phone, in which Gurpatwant Singh Pannun is speaking that "*Sikhs working for the cause of liberating Punjab from the occupation of India have today on June 11 by hoisting the flat of Khalistan at D.C office Faridkot and by writing Khalistan Zindabad on the wall of District Courts opposite D.C office have shown that Punjab is on the way of Independence from India:- message of Gurpatwant Singh Pannu General Council of Sikhs for Justice.*"

iii. Copy of FIR annexed with affidavit in vernacular is **Exhibit PW-34/P1A** and English translation thereof is **Exhibit PW-34/P1B**. Supplementary challan form under Section 173(8) Cr.P.C. is **Exhibit PW-34/P2A** and English translation thereof is **Exhibit PW-34/P2B**. True copy of Recovery Memo of Khalistan Flag and English translation thereof and **Exhibit PW-34/P3A Exhibit PW-34/P3B**; Memo presenting pen drive in vernacular is **Exhibit PW-34/P4A** and English translation thereof is **Exhibit PW-34/P4B**.

iv. PW-34 further deposed that during the course of investigation, it was found that in FIR No.414 dated 20.06.2022 registered u/s 153-A/120-B IPC, 10,13,18 Unlawful Activities (Prevention) Act 1967 and 3 PDPP PS Civil Line Karnal, accused Manjit Singh son of Harjinder Singh made a confessional statement that *on 10,11-06-2022 as per the directions of Gurpatwant Singh Pannu and Vikramjit Singh, had written Khalistan*

Jindabad with black colour spray on the wall of house/Kothi of Sessions Judge situated below the Railway over bridge at Talwandi Road and while leaving the place/spot put up/installed Khalistan flag at the back side gate of Court and then after going on Motorcycle Platina, made the videography and same was sent on his Whatsapp. Consequently, accused Manjit Singh son of Harjinder Singh resident of Duldi PS Sadar Nabha District Patiala and Vikramjit Singh were arrayed as accused in this case.

v. Thereafter, on 28.07.2022, C-02 Gurpreet Singh No. 830/ Faridkot Cyber and Technical Support Unit Faridkot produced one pen drive before Sh. Jasmeet Singh, PPS Deputy Superintendent of Police (Sd) Faridkot and informed that the Pendrive contained that video downloaded from You Tube URL link (<https://youtu.be/MIvICHtC9Xc>) in which Gurpatwant Singh Pannun is speaking that "*the Sikhs who are fighting for liberation of Punjab from the occupation of India have hoisted the Khalistan flag in front of the DC office of Faridkot today on June 11th and have written Khalistan Zindabad on the wall of Court situated in front of it and has told/showed that it is going on the way of independence from the occupancy of Independent India*".

vi. Memo presenting pen drive containing video downloaded from YouTube in vernacular is **Exhibit PW-34/P5A** and English translation thereof is **Exhibit PW-34/P5B**; Memo presenting CD dated 20.12.2022 is **Exhibit PW-34/P6A** and English translation thereof is **Exhibit PW-34/P6B**; Transcript of the YouTube videos is **Exhibit PW-34/P7A** and English translation thereof is **Exhibit PW-34/P7B** and YouTube video link is **Exhibit PW-34/P8**. Copy of charge framed against accused Manjeet Singh is **Exhibit PW-34/P9**. The statement of Manjeet Singh pleading not guilty is **Exhibit PW-34/P10** which has been inadvertently referred in the affidavit as the true copy of the cognizance order of supplementary chargesheet.

vii. PW-34 further deposed that a supplementary chargesheet was filed against accused Vikram Brar @ Vicky on 14.11.2023 which is already **Exhibit PW-34/2A** along with English translation thereof as **Exhibit PW-34/2B**. **Exhibit PW-34/12A** is the true copy of the statements of ten witnesses along with supplementary statements recorded under Section 161 Cr.P.C. in vernacular. English translation thereof is **Exhibit PW-34/12B**.

viii. The witness on oath stated that the aforesaid FIR has been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely and as such, he expressed the view that if the ban to the SFJ is not extended it will resurrect and revive militancy and terrorism in the State of Punjab and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilizing the Government established by law.

57. **PW-35**

i. **PW-35 Lavdeep Singh Gill, PPS**, Deputy Superintendent of Police, Detection, District Moga, Punjab tendered his affidavit **Exhibit PW-35/A** with reference to FIR No.13/2023, and **Exhibit-PW-35/B** with reference to FIR No.124/2023 after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.13/2023 dated 27.02.2023 u/s 153-A IPC and Section 3 of The Punjab

Prevention of Defacement of Property Act, 1997 registered at Police Station Smalsar, District Moga. This FIR is not mentioned in the Background Note. He further deposed that he is also the Supervisory Officer of FIR No.124/2023 dated 02.06.2023 u/s 153-A/153-B/505 IPC, registered at Police Station City Moga, Punjab, mentioned at Serial No. 48 of the Background Note. The contents of the affidavits are stated to be based on record revealed during investigation as well as his personal knowledge acquired over 30 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 13/2023, Police Station-Smalsar, District Moga, Punjab

ii. PW-35 testified that FIR No. 13/2023 dated 27.02.2023 under section 153-A IPC & Section 3 of The Punjab Prevention of Defacement of Property Act, 1997 was registered at Police Station Smalsar, District Moga, State Punjab. As per the FIR, on 27.02.2023, ASI Baljinder Singh, reached near GTB Garh in connection with patrolling and checking of suspected persons when they received a secret information that on the outer wall of the Polytechnic College Rode, some unknown persons had written “Khalistan Zindabad” and “G-20 Foreign Minister, Punjab is not a India” with black ink. Further, in this way they have tried to spread disharmony between general public as well as law and order. FIR was accordingly registered and investigation was initiated.

The copy of the FIR in Vernacular is **Exhibit-PW 35/P1** and English translation thereof is **Exhibit-PW-35/P2**.

iii. He deposed that despite efforts, since the accused could not be traced, an Untrace Report was filed under Section 173 Cr.P.C. The Untrace Report has been accepted by the Court of Sh. Vijay Kumar (inadvertently written as Jatinderpal Singh in the affidavit) vide order dated 20.07.2024. **Exhibit-PW-35/P3** is the true copy of Untrace Report in vernacular and English translation thereof is **Exhibit-PW-35/P4**.

FIR No. 124/2023, Police Station-City Moga, Punjab.

iv. PW-35 further deposed that FIR No.124/2023, dated 02.06.2023 u/s 153-A/153-B/505 IPC, was registered at Police Station City Moga, Punjab on the complaint of ASI Buta Singh who stated that during patrolling at Bus Stand Moga, people had gathered and it was revealed that "Khalistan Jindabad" slogans were written on the bathroom wall of the Bus Stand and ticket counter. Also, a saffron colour flag with Khalistan written on one side of the flag and khanda printed on another side, was hoisted on the ticket counter. The said Khalistani slogans were written by some unidentified person/persons to instigate hatred, contempt, break unity and generate feelings of animosity among citizens.

v. **Exhibit-PW-35/PP1 (referred as P1 in the affidavit Exhibit PW-35/B)** is the vernacular copy of FIR No.124/2023 dated 02.06.2023 PS Moga Punjab. English translation thereof is **Exhibit-PW-35/PP2 (referred as P2 in the affidavit Exhibit-PW-35/B)**.

vi. He further deposed that during investigation of the case, on 03.06.2023 Pritpal Singh s/o Sukhchain Singh r/o Gholia Khurd and Daljit Singh s/o Gurdev Singh r/o Chuharchak were nominated as accused. On 24.06.2023 accused Daljit Singh and Pritpal Singh were arrested by the police. On the basis of disclosure statements of Pritpal s/o Sukhchain Singh said Gurpatwant Pannun has also been nominated as accused vide DDR No.24 dated 30.06.2023.

vii. Memo of recovery of spray dated 30.06.2023 in vernacular along with English translation thereof is **Exhibit PW-35/PP3** (referred as P3 in the affidavit Exhibit PW-35/B); Confessional statement/disclosure statement of accused Daljit Singh as well as Pritpal Singh in vernacular along with English translation thereof are **Exhibit PW-35/PP4** (referred as P4 in the affidavit Exhibit PW-35/B); GD No.24 dated 30.06.2024 in vernacular along with English translation thereof is **Exhibit PW-35/PP5** (referred as P5 in the affidavit Exhibit PW-35/B).

viii. He deposed that the Chargesheet dated 18.11.2023 was filed before the Court of Judicial Magistrate I Class, Moga, wherein cognizance has been taken. Copy of the Chargesheet in vernacular along with English translation thereof is **Exhibit PW-35/PP6** (referred as P6 in the affidavit Exhibit PW-35/B). The statements of two witnesses under Section 161 Cr.P.C. in vernacular along with English translation thereof is **Exhibit PW-35/PP7** (referred as P7 in the affidavit Exhibit PW-35/B).

ix. He further stated on oath that both the FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. He was of the view that if the ban to the SFJ is not extended, it cannot be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law.

58. PW-36

i. **PW-36 Jasbir Singh**, Superintendent of Police, Special Branch, District Patiala tendered his affidavit **Exhibit PW-36/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIRs bearing No.148/2022, dated 15.07.2022 u/s 153-A, 153-B, 120-B IPC, Section 3 of Prevention of Defacement of Property Act, Section 13 of Unlawful Activities (Prevention) Act and Section 18 of Unlawful Activities Amendment Orders Act registered at Police Station Kotwali, District Patiala; FIR No. 144/2021 dated 26.12.2021 u/s 153-A, 505(2), 505(3), 120-B IPC registered at Police Station Banur, District Patiala; FIR No.179/2018 dated 22.10.2018 under Sections 25/54/59 Arms Act registered at Police Station Sadar Samana, District Patiala and FIR No.132/2018 dated 31.10.2018 under Sections 13, 16, 18, 20 of Unlawful Activities Prevention Act, Section 3,4,5 of Explosive Substances Act and Section 25, 54 and 59 of Arms Act and Section 120-B IPC registered at Police Station Lahori Gate, District Patiala, mentioned at serial Nos.40, 26, 07, and 08 respectively of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 12 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 148/2022, Police Station - Kotwali, District Patiala, Punjab.

ii. PW-36 testified that FIR No.148/2022 dated 15.07.2022 under Sections 153-A, 153-B, 120-B IPC, Section 3 of Prevention of Defacement of Property Act, Section 13 of Unlawful Activities (Prevention) Act

and Section 18 of Unlawful Activities Amendment Orders Act was registered at Police Station Kotwali, District Patiala on statement of ASI Babu Lal, Police Station Kotwali, Patiala who stated that on 14.7.2022, he along with HC Gurpiar Singh were on duty at Sri Kali Mata Temple, Patiala. As per FIR, at about 5.30 a.m., ASI Babu Lal and HC Gurpiar Singh reached near a public toilet block situated at the backside of Sri Kali Mata Temple, Patiala, wherein two electricity transformers are installed and they saw a yellow colour banner pasted on the wall, whereupon the words "SFJ" and "HUL KHALISTAN REFERENDUM 26 JANUARY" were printed with black ink. The said poster was pasted by a miscreant to cause differences between Hindus and Sikhs. FIR was accordingly registered and the said poster was removed and taken into possession vide separate recovery memo.

The copy of the FIR annexed with affidavit in vernacular and its English translation thereof are **Exhibit PW-36/P1** and **Exhibit PW-36/P2**.

iii. He further deposed that during the course of investigation, statement of Ashutosh Gautam, General Secretary of Hindu Suraksha Samiti and member of Veer Haqiqat Rai Sabha was recorded, who reached the spot when the police were removing the said poster. In his statement, Ashutosh Gautam stated that Gurpatwant Singh Pannun, who is running Sikhs for Justice (SFJ) Organization, which has been declared illegal by the Government of India, usually commits such activities to incite communal strife. He further stated that Harwinder Singh @ Prince, son of Balkar Singh, along with Prem Singh @ Ekam, son of Bachittar Singh, had pasted the said banner on the backside of temple on the intervening night of 14/15.7.2022. Further, they also came to know that said provocative banner with Khalistan written on it was being put up with aid of Discover Motorcycle No.PB-39E-7196. Further, after pasting the poster, said Harwinder Singh @ Prince and Prem Singh @ Prem had taken photographs and sent them to Gurpatwant Singh Pannun through Whatsapp, who in turn made video of the same viral on social media. In the said video, Gurpatwant Singh Pannun is seen stating that *"Sikh for justice is sending message to newly elected Bhagwant Mann, Chief Minister of Punjab and Director General of Police, Punjab Gaurav Yadav, that today the Punjab for Khalistan Referendums have pasted flag of Khalistan outside the Sri Kali Mata Devi, Patiala. The hands that are pasting Khalistan Flag, they know now how to tackle the situation and also very well know how to use rocket. SFJ has assigned referendum in those hands, who know how to use rocket, if you do not stop registering FIR against SFJ Workers, they can use rockets. This message is of Gurpatwant Singh Pannu"*. The said banner was pasted to create terror in the mind of general public and to misguide the youngsters, on the directions of Gurpatwant Singh Pannun. Therefore, on the statement of Ashutosh Gautam, accused Prem Singh @ Prem @ Ekam and Harwinder Singh @ Prince were nominated as accused in the above noted case on 19.07.2022.

Copy of the statements of witnesses recorded under Section 161 Cr.P.C. along with English translation thereof, are **Exhibit PW-36/P3 (colly)**.

iv. He deposed that during the investigation, both the accused were arrested on 19.07.2022 by the police along with their motorcycle and 14 more such banners/posters were recovered at their instance. Also, offence under Section 153-B, 120-B IPC and Sections 13 and 18 of Unlawful Activities (Prevention) Act were added on 20.07.2022 and Gurpatwant Singh Pannun was also nominated as an accused in this case. During the

interrogation of said accused, a mobile phone make Vivo containing SIM No.77105-10868 was recovered from Harwinder Singh. The second SIM for Whatsapp + 6011615451 was recovered in which only whatsapp was running and was purchased from Malaysia. From these SIMs, it was found that accused Harwinder Singh @ Prince was in regular touch with Gurpatwant Singh Pannun. It was further revealed that Harwinder Singh purchased above said motorcycle with Rs.25,000/- transferred in his account by one Gurjot Singh at the instance of Gurpatwant Singh Pannun. The banners removed from the spot were taken into possession vide production memo dated 15.07.2022. Furthermore, 14 Banners recovered from accused - Prem Singh and co-accused Harwinder Singh on 19.07.2022 were taken into possession vide recovery memo. From the facts stated above, it is clear that accused Prem Singh alongwith co-accused Harwinder Singh received Rs.25,000/- from Gurpatwant Singh Pannun vide receipt No. 6284377445 dated 9.7.2022 and accused Prem Singh alongwith accused Harwinder Singh prepared banners on which 'SFJ PUNJAB', logo of Khanda mark and 'HUL KHALISTAN REFERENDUM 26 JANUARY' was written and pasted behind the Temple of Sri Kali Mata, Patiala. The said accused indulged in anti-national activities at the instance of Gurpatwant Singh Pannun.

v. The witness further deposed that the banner/poster, which was pasted on the backside of the Kali Mata Temple, was seized on 15.07.2022. 14 banners were also recovered on 19.07.2022 from the motorcycle of the accused. Furthermore, a video recovered from the mobile phone of the accused was also recovered on 10.05.2023 during investigation. Copy of the recovery memos along with English translation thereof, is collectively **Exhibit PW-36/P4**.

vi. He further stated on oath that after completion of investigation, Chargesheet was submitted before the Trial Court at Patiala on 17.10.2022. A supplementary charge sheet was also presented before the Trial Court against all the accused on receipt of prosecution sanction from the Government on 01.08.2023. Charge is yet to be framed in the said case and last date of hearing was 04.11.2024. Gurpatwant Singh Pannun is still at large and proceedings for declaring him as a proclaimed offender have been initiated.

Copy of the Chargesheet along with its English translation thereof, is **Exhibit PW-36/P5**; copy of order dated 18.10.2024 passed by Trial Court is **Exhibit PW-36/P6**; copy of video clip recovered is **Exhibit PW-36/P7**.

FIR No. 144/2021, Police Station-Banur, District Patiala

vii. PW-36 further deposed that FIR No. 144/2021 dated 26.12.2021 under Sections 153-A, 505(2), 505(3), 120-B IPC was registered at Police Station Banur, District Patiala. As per FIR, on 26.12.2021, when police party headed by Inspector Tejinder Singh, SHO P.S.Banur was present near Bano Mayi Mandir, Banur, a secret information was received that one Jagmeet Singh and Ravinder Singh are preaching in favour of Khalistan by visiting different religious and other public places and provoking innocent people to form Khalistan by voting through referendum and are distributing registration forms for voting. They were also informed that Jagmeet Singh and Ravinder Singh are also raising slogans like '*long-live Khalistan*' and '*the only way to independence is through Khalistan etc.*' and are pasting posters of the same. These posters and other material for printing was provided to them by Jagmeet Singh's mother Jasvir Kaur w/o Kuldeep Singh. This act of Jasvir Kaur, Jagmeet Singh and Ravinder Singh of pasting posters in favour of Khalistan, writing slogans in favour of Khalistan and provoking innocent people is against the sovereignty and integrity of India.

It was also noted that Jasvir Kaur sent Jagmeet Singh and Ravinder Singh alongwith the necessary items to Fatehgarh Sahib on a black and silver coloured motorcycle bearing registration No.PB 48F 8245 make Hero, to paste posters and write slogans in favour of Khalistan on the walls. The informer also stated that these people are coming from Fatehgarh Sahib via Rajpura, Banur on the abovesaid motorcycle and if nakabandi is done, they can be apprehended with heavy quantity of material that is in the favour of Khalistan and against the country. FIR No.144 dated 26.12.2021 was accordingly registered against Jagmeet Singh, Ravinder Singh and Jasvir Kaur u/s 153A, 505(2), 505(3), 120-B IPC at Police Station Banur, District Patiala.

The copy of the FIR annexed with affidavit in vernacular along with English translation thereof, are **Exhibit PW-36/P8** and **Exhibit PW-36/P9** respectively.

viii. He further deposed that upon receipt of aforesaid information, nakabandi was done and a motorcycle bearing registration No. PB-48-F-8245 make Hero coming from Rajpura which was ridden by two Sikh young men was apprehended. The driver of the motorcycle disclosed his name as Ravinder Singh and the pillion rider disclosed his name as Jagmeet Singh. Different posters, plastic plates, paint sprays of different colors and markers etc. were recovered from them. More than 206 forms, posters, plates in favour of Khalistan along with different coloured spray paints were recovered. During the course of interrogation, the abovesaid accused disclosed that they were motivated by Jagmeet Singh's mother and co-accused Jasvir Kaur to preach about Khalistan and Jasvir Kaur provides them ingredients in favour of Khalistan and today also, she has sent them to preach at Shahidi Jor Mela at Shri Fatehgarh Sahib and Jasvir Kaur alongwith more forms and posters etc. Accordingly, Jasvir Kaur was apprehended by the police party and upon checking the carry bag held in her hand, forms relating to registration of votes to separate Punjab from India referendum and markers etc. were recovered. The same were taken into possession. Further, during interrogation, she disclosed that they have registered votes of their whole family to conduct Khalistan referendum and are motivating people of Shahidi Jor Mela at Sri Fatehgarh Sahib to form Khalistan.

Copy of the statements of witnesses recorded under Section 161 Cr.P.C. along with English translation thereof, are collectively **Exhibit PW-36/10**.

ix. PW-36 further testified that during investigation, it revealed that accused Jagmeet Singh, Ravinder Singh and Jasvir Kaur are the members of SFJ, which is run by Gurpatwant Singh Pannun. He further stated that the intention of the organization is to make a separate country, Khalistan due to which, the organization wants to do a referendum, and for making the same successful, accused persons have become members of SFJ and have distributed voter-registration form and other printed items in furtherance of the same. The accused in connivance with each other hatched a calculated conspiracy to undertake activities in furtherance of the objective of SFJ.

x. The witness also stated that various materials- 453 forms, 39 posters, plates, 3 bottles of spray paint from accused Ravinder Singh and Jasmeet Singh were recovered. Furthermore, 100 forms from accused Jasvir Kaur was recovered as well. Copy of the recovery memos along with English translation thereof, are collectively **Exhibit PW-36/P11**.

xi. PW-36 deposed that after completion of investigation, final report under Section 173 Cr.P.C. was presented before Trial Court on 24.06.2022 against accused Jagmeet Singh, Ravinder Singh and Jasvir Kaur.

Supplementary challan under Section 173(8) Cr.P.C. after obtaining prosecution sanction, was filed before the Trial Court on 26.09.2022. The charge against the accused has been framed on 22.09.2022 and the last date of hearing for prosecution evidence was 19.11.2024.

Copy of the Chargesheet along with English translation thereof, is **Exhibit PW-36/P12**; copy of order dated 26.09.2024 passed by Trial Court is **Exhibit PW-36/P13**.

FIR No. 179/2018, Police Station-Sadar Samana, District Patiala

xii. PW-36 further testified that FIR No.179/2018 dated 22.10.2018 under Sections 25/54/59 Arms Act was registered at Police Station Sadar Samana, District Patiala. During investigation of FIR No.47 dated 27.02.2018 registered u/s 392 IPC, 25 Arms Act at PS Patran, accused Jarman Singh made a disclosure statement before Inspector Shaminder Singh that he after committing crime had hidden his 4 weapons at Village near Bizalpur. Accordingly, the 4 weapons i.e., 32 bore pistol, two countrymade pistols 315 bore and one rifle 315 bore were recovered and consequently, said FIR No. 179 was registered against Jarman Singh under Section 25/54/59 Arms Act.

xiii. He deposed that after completion of investigation, final report was presented before Ld. Trial Court. Accused Jarman Singh stands convicted by the Trial Court vide judgment dated 03.02.2024. Though, there is no mention or link found out with SFJ or its office bearers in the said FIR but it is believed that the offence for which accused Jarman Singh was convicted was done to promote militancy in the State of Punjab which aligns with Gurpatwant Singh Pannun's propaganda.

FIR No. 132/2018, Police Station-Lahori Gate, District Patiala, Punjab

xiv. PW-36 deposed that FIR No.132/2018 dated 31.10.2018 under Sections 13, 16, 18, 20 of Unlawful Activities Prevention Act, Section 3,4,5 of Explosive Substances Act and Section 25/54/59 Arms Act and Section 120-B IPC was registered at Police Station Lahori Gate, District Patiala, pursuant to secret information received by DSP Sukhwinder Singh Chauhan that Sabnamdeep Singh is participating in terrorist activities, who is part of a terrorist organization, Khalistan Liberation Force ('KLF'), for some time and is working for recruiting new members in new organization 'Khalistan Gadar Force'. Further, he issued press notes and threat letters on the letter pad of KLJ and is being helped by ISI, KLF, old terrorist and members of Babbar Khalsa by providing money and arms. It was also informed that Sabnamdeep Singh in connivance with his accomplices was intending to carry out blast in a crowded place, due to which loss of lives may be caused and was preparing to spread terrorist activities by murdering numerous people. FIR was accordingly registered.

xv. He further testified that during investigation, accused Sabnamdeep Singh was arrested on 01.11.2018 and one pistol alongwith 6 live cartridges, one grenade and letter pads of Khalistan Liberation Force and Babbar Khalsa International were recovered. On interrogation of accused, Gursewak Singh, Ramesh Kumar and Vinod Kumar were nominated as accused on 02.11.2018 and offence under Section 120-B IPC was added in the FIR. Thereafter, one Harmeet Singh @ Meet @ PHD was also nominated as accused on 18.02.2018.

xvi. He deposed that Final Report under Section 173 Cr.P.C. against accused Sabnamdeep Singh, Ramesh Kumar, Vinod Kumar and Jatinder Singh @ Binder was presented before the Trial Court on 26.04.2019.

Accused Kulwinderjit Singh was declared Proclaimed Offender by the Competent Court on 17.11.2021 and was subsequently arrested on 04.04.2024. The case is stated to be pending trial for defence evidence for 18.10.2024.

xvii. PW-36 further deposed that though there is no mention or link found out with SFJ or its office bearers in said FIR but it is believed that the offence for which the accused Jarman Singh was convicted was done to promote militancy in the State of Punjab which aligns with Gurpatwant Singh Pannun's propaganda.

xviii. The witness has stated on oath that the investigation of the aforesaid FIRs brings to surface acts evoking and stirring up Khalistani sentiments in the form of sprayed Pro-Khalistani graffiti and other acts. This shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cession and secessionist activities in a clandestine manner. He further expressed the view that if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate its subversive activities including attempts to carve out Khalistan Nation by separating territory of Punjab from the territory of Union of India by destabilising the Government established by law. PW-36 further agreed with the views of Ministry of Home Affairs that if the unlawful activities of the SFJ are not curbed and controlled immediately, it is likely to resurrect and revive militancy and terrorism in the State of Punjab and other parts of the country in general.

59. PW-37

i. **PW-37 Surinder Singh Bhorla**, Superintendent of Police, Ambala, Haryana, tendered his affidavit **Exhibit PW-37/A** after due authorization by the Competent Authority. He deposed regarding FIR No.71/2023 dated 04.03.2023 under Section 153A IPC registered at P.S. Ambala Sadar, Ambala, mentioned at Serial No.64 of the Background Note. He also deposed regarding FIR No.398/2022 dated 28.07.2022 under Sections 153A and 120B IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967 registered at Police Station-Baldev Nagar, Ambala, which does not find mention in the Background Note but is relied upon as additional evidence. The contents of his affidavit are stated to be based on record revealed during the investigation and on his personal knowledge acquired during 20 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 71/2023 Police Station-Ambala Sadar, Ambala

ii. PW-37 testified that FIR No. 71/2023 dated 04.03.2023 under Section 153A IPC was registered at P.S. Ambala Sadar, Ambala. As per FIR, on 04.03.2023, EHC Ravindra Singh, Security Agent, Police Station Ambala Sadar, gave a complaint, stating that he saw a crowd on the Rajpura Flyover while he was going towards PS: Balana and saw a yellow cloth tied to a wooden stick resembling a flag attached to the cement railing. The flag had the words "SFJ, KHALISTAN" written in English with black ink. The wall of the bridge below had the words "KHALISTAN G20 FORGION MINISTOR WELCOME" written in English again with black ink. Copy of FIR in vernacular is **Exhibit PW-37/A1** and English translation thereof is **Exhibit**

PW-37/A2; copy of Recovery Memo dated 04.03.2023 is **Exhibit PW-37/A3** and its English translation thereof is **Exhibit PW-37/A4**.

iii. He further deposed that the statement of witness EHC Ravinder Singh was recorded under Section 161 Cr.P.C. and copy of the same in vernacular is **Exhibit PW-37/A5**. English translation thereof is **Exhibit PW-37/A6**.

iv. Witness stated on oath that despite investigation, the identity of the accused could not be ascertained and, therefore, an Untrace Report dated 25.10.2024 was filed before the Trial Court. Copy of the Untrace Report in vernacular is **Exhibit PW-37/A7** and English translation thereof is **Exhibit PW-37/A8**.

FIR, No. 398/2022, Police Station-Baldev Nagar, Ambala

v. PW-37 testified that the FIR No.398/2022 dated 28.07.2022 under Sections 153A and 120B IPC & Section 13 of Unlawful Activities (Prevention) Act, 1967 was registered at Police Station-Baldev Nagar, Ambala. As per FIR, on 28.07.2022 Jasbir Chand, EHC C-1, Security Agent, Police Station Baldev Nagar, District Ambala received information that a banner pertaining to Khalistan had been hoisted on M.T. Crossing, Air Force Station Road upon which Jasbir Chand along with ASI Waryam Singh, EHC Krishan Kumar and Constable Rakesh Kumar reached at the spot. Copy of FIR in vernacular is **Exhibit PW-37/A9** and English translation thereof is **Exhibit PW-37/A10**; copy of the statement of complainant under Section 161 Cr.P.C. in vernacular along with English translation thereof are **Exhibit PW-37/A11** and **Exhibit PW-37/A12** respectively.

vi. He deposed that a banner with the words “HARYANA BANEGA KHALISTAN-REFRENDUM VOTING 26th JANUARY” along with a religious sign was recovered during investigation. Copy of seizure memo dated 28.07.2022 in vernacular along with photograph and English translation thereof are **Exhibit PW-37/A13** and **Exhibit PW-37/A14** respectively.

vii. The witness further deposed that investigation led to accused Harvinder Singh @ Prince and Prem Singh @ Ekam, who were already in judicial custody in FIR No.148 dated 15.07.2022, u/Section 153-A, 153 B, 120B IPC, 3 PDPP Act, 13 UAP Act, PS Kotwali Patiala, Punjab. The accused persons had already made disclosure statements which revealed that they had put up the banner on instructions of Gurpatwant Singh Pannun. Copy of statement of ASI Mewa Singh under Section 161 Cr.P.C. in vernacular along with English translation thereof are **Exhibit PW-37/A15** and **PW-37/A16** respectively.

viii. He further testified that accused Harvinder Singh @ Prince was arrested on 22.11.2022 and the accused Prem Singh @ Ekam was arrested on 31.01.2023. It emerged that accused received the banner from one Harsh resident of Amritsar, who is leader of the Khalistani movement. Accused also revealed that Harsh is an admin of a WhatsApp group created by Gurpatwant Singh Pannun. Accused Prem Singh @ Ekam also admitted that he has received an amount of Rs.25,000/- from Gurpatwant Singh Pannun which was withdrawn by him from Western Union Money Transfer, Rajpura by giving his Aadhar Card. Copy of disclosure statement of Harvinder Singh @ Prince in vernacular along with English translation thereof are **Exhibit PW-37/A17** and **PW-37/A18** respectively; copy of the disclosure statement of Prem Singh @ Ekam in vernacular along with English translation thereof is **Exhibit PW-37/A19** and **PW-37/A20** respectively.

ix. He further deposed that in the light of evidence collected during investigation, offences under Sections 153-A, 120-B IPC & Section 13 Unlawful Activities (Prevention) Act were invoked against accused Harvinder Singh @ Prince, Prem Singh @ Ekam and Gurpatwant Singh Pannunn. A final report was filed under Section 173 CrPC on 17.02.2023 and the case was committed to the Sessions Court, Ambala, vide order dated 24.03.2023. Charge was framed against accused Harvinder Singh @ Prince and accused Prem Singh @ Ekam. The matter is stated to be pending for prosecution evidence and the next date of hearing was fixed for 16.12.2024. Copy of the Chargesheet dated 14.02.2023 filed in FIR No.398 dated 22.07.2022 in vernacular along with English translation thereof is **Exhibit PW-37/A21 and Exhibit PW-37/A22** respectively; copy of order dated 18.12.2023 passed by Additional Sessions Judge is **Exhibit PW-37/A23**; copy of order dated 24.03.2023 passed by JMIC, Ambala is **Exhibit PW-37/A24**.

x. PW-37 further deposed that application for bail preferred on behalf of accused Prem Singh @ Ekam Prince was dismissed vide order dated 27.09.2024 passed by the Additional Sessions Judge, Ambala and the copy of the same is **Exhibit PW-37/A25**. Application for bail preferred on behalf of accused Harvinder Singh @ Prince was dismissed vide order dated 02.04.2024 by the Additional Sessions Judge, Ambala and the copy of the same is **Exhibit PW-37/A26**.

xi. Witness stated on oath that the aforesaid FIRs have been registered against Gurpatwant Singh Pannunn and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannunn and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. PW-37 expressed the view that if the ban to the SFJ is not extended, it cannot be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

60. PW-38

i. PW-38 Manmohan Singh, Assistant Commissioner of Police Headquarters, Commissionerate Jalandhar, tendered his affidavit **Exhibit PW-38/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.76/2022 dated 15.06.2022 under Sections 124-A, 153-A, 153-B and 120-B IPC registered at Police Station: Division No. 3, District- Commissionerate, Jalandhar, Punjab; FIR No. 66/2022 dated 30.06.2022 under Section 121-A, 124-A, 153-A, 120-B of IPC and Sections 66(A), 66(F) of IT Act registered at PS Cantt, Commissionerate, Jalandhar and FIR No.102/2022 dated 28.08.2022, under Section 121-A,124-A,153-A,120-B IPC and 66 (A), 66 (F) of IT Act registered at Police Station Navi Baradari Commissionerate, Jalandhar, which are mentioned at Serial No.34, 37, and 42 of the Background Note. The contents of the affidavit are stated to be based on record revealed during the investigation as well as on his personal knowledge acquired during 25 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No. 76/2022, Police Station-Division No. 3, District Commissionerate, Jalandhar, Punjab.

ii. PW-38 testified that FIR No.76/2022 dated 15.06.2022 under Sections 124-A, 153-A, 153-B and 120-B IPC was registered at Police Station: Division No. 3, District- Commissionerate, Jalandhar, Punjab.

Later on, Section 124-A IPC was deleted. Also, Section 13 of Unlawful Activities (Prevention) Act, 1967 which were added during investigation stands deleted. Further, Section 3 of Prevention of Defacement Property Act, 1985 was added during investigation. As per FIR, during intervening night of 14-15/06/2022, a secret information was received by the police party of PS Division No. 3 that some unknown person has written "Khalistan Zindabad" on the wall outside the office of one Sh. Gulshan Sharma in black ink which is situated in the area of Mohalla Lakshmipura Jalandhar, with an intent to create an anti-national movement. On the basis of the same, aforesaid FIR was registered.

iii. He further deposed that accused Manjit Singh @ Meet s/o Harjinder Singh alias Jinder son of Amarjit Singh r/o Village Duldi Police Station: Sadar-Nabha, district Patiala was arrested on 12.07.2022. Other accused namely Gurpatwant Singh Pannun s/o Mohinder Singh Pannun R/o Village Khankot, PS Ram Bagh, Distt. Amritsar City and H. No.2033, Sector 15-C, Chandigarh, present address 167-05, Powells Blvd., Unit 22, White Stone, NY-11375, USA and accused Vikramjit Singh S/o unknown resident of USA are yet to be arrested.

iv. He deposed that during the course of investigation, accused Manjit Singh made a confessional/disclosure statement that during the midnight of 14-15/06/2022 he was present in the street near Devi Talab Mandir, Lakshmipura Mohalla, Jalandhar on his motorcycle Platina No. PB-34C-3336 and had written the words 'Khalistan Jindabaad' in Punjabi with Spray on the said wall under the street light and also made a video of writing which was forwarded to co-accused Gurpatwant Singh Pannun and Vikramjeet Singh Khalsa. Supplementary statement under Section 161 of Cr.P.C. of witness Gulshan Kumar Sharma owner of the said property was recorded by the police. The witness also saw the video on social media i.e. YouTube of his office, wherein on his office wall words 'Khalistan Zindabaad' were written and he downloaded the video from the YouTube and submitted the same in a pen drive to the police. Chargesheet was accordingly filed in the Court of Sh. Joginder Singh, JMIC, Jalandhar against accused Manjit Singh. He further stated that supplementary Chargesheet against co-accused Gurpatwant Singh Pannun and Vikramjit Singh will be presented in the concerned Court as and when the co-accused are arrested.

v. He deposed that a supplementary challan (police report) under section 173(8) of Cr.P.C. has been submitted on 15.03.2023 by the S.H.O of PS Division No. 3 in the Court of Sh. Sarabjit Singh Dhaliwal, ASJ, Jalandhar. Accused Manjit Singh was discharged by the Trial Court on 19.04.2023. The co-accused are yet to be arrested and investigation qua them is pending. A true copy of FIR in vernacular is **Exhibit PW-38/P1** and English translation thereof is **Exhibit PW-38/P2**; copy of confessional statement of accused Manjit Singh is **Exhibit PW-38/P3** and English translation thereof is **Exhibit PW-38/P4**; copy of statement of ASI Dev Raj recorded under Section 161 Cr.P.C. is **Exhibit PW-38/P5** and English translation thereof is **Exhibit PW-38/P6**; copy of supplementary statement of witness Gulshan Kumar Sharma recorded under Section 161 Cr.P.C. is **Exhibit PW-38/P7** and English translation thereof is **Exhibit PW-38/P8**; pen drive containing the video footage is **Exhibit PW-38/P9** and copy of transcription thereof is **Exhibit PW-38/P10**; copy of certificate under Section 65-B of Indian Evidence Act is **Exhibit PW-38/P11** and English translation thereof is **Exhibit PW-38/P12**; copy of Chargesheet is **Exhibit PW-38/P13** and English translation thereof is **Exhibit PW-38/P14**; copy of supplementary Chargesheet is **Exhibit PW-38/P15** and English translation

thereof is **Exhibit PW-38/P16**; certified copy of order dated 19.04.2023 discharging accused Manjit Singh is **Exhibit PW-38/P17** and true copy of the same is **Exhibit PW-38/P18**.

FIR No. 66/2022, Police Station-Cantt., Commissionerate, Jalandhar

vi. PW-38 deposed that FIR No. 66/2022 dated 30.06.2022 under Section 121-A, 124-A, 153-A, 120-B of IPC and Sections 66(A), 66(F) of IT Act was registered at PS Cantt, Commissionerate, Jalandhar. As per FIR, SI Ranjit Singh stated that on 30.06.2022 he along with SI Yoga Singh, Const, Amanjit Singh were on government gypsy No. PB-12D-0081 driven by ASI Ravinder Pal Singh on patrolling duty. About 3:15 AM near Gate 1, Bhoormandi side, PAP complex, they saw the wall of PAP Complex on which '*04 July 1955 26 January Vota Khalistan Zindabad*' was written with black ink. Thereafter, he came to know from a video, viral on social media that this was planned by one Gurpatwant Singh Pannun, who is a Khalistani supporter living abroad and wants to disturb the peace and harmony of Punjab and create an anti-national movement to break the country. FIR was accordingly registered.

vii. The witness further deposed that said viral video was downloaded and saved in a pen drive, which was taken into possession. During investigation, it was found that accused Raman @ Sonu had made a disclosure statement in another FIR No.102 dated 28.08.2022 u/s 121-A, 124-A, 153-A, 120-B IPC 66-F IT ACT 2000 registered at PS Navi Baradari. In the said disclosure statement, accused Raman @ Sonu stated that in June 2022 he himself wrote words '*Khalistan Zindabad and 4 July 1955*' on the walls of PAP Complex/headquarters Jalandhar. Accordingly, accused Raman @ Sonu, after obtaining production warrants, was arrested in present case on 30.09.2024. Accused Raman @ Sonu confessed that Bikramjit Singh Khalsa called him on WhatsApp and asked him to write the said words for which he received Rs.40,000/-.

viii. He further deposed that the Chargesheet was filed on 17.12.2022 after investigation. After obtaining sanction from the Competent Authority, a supplementary Chargesheet was submitted u/s 173(8) Cr.P.C. on 05.08.2024. Charge has been framed against the accused by the concerned Court vide order dated 14.08.2024.

The case is stated to be at the stage of prosecution evidence and the last date of hearing was scheduled for 05.11.2024. A copy of FIR in vernacular is **Exhibit PW-38/P19** and English translation thereof is **Exhibit PW-38/P20**; memo of production of pen drive is **Exhibit PW-38/P21** and English translation thereof is **Exhibit PW-38/P22**; pen drive containing video footage is **Exhibit PW-38/P23** and transcription thereof is **Exhibit PW-38/P24**; copy of statement of witness L/CT Ravinder Kaur No.2697/Jalandhar recorded under Section 161 Cr.P.C. is **Exhibit PW-38/P25** and English translation thereof is **Exhibit PW-38/P26**; copy of Chargesheet in vernacular is **Exhibit PW-38/P27** and English translation thereof is **Exhibit PW-38/P28**; copy of supplementary Chargesheet in vernacular is **Exhibit PW-38/P29** and English translation thereof is **Exhibit PW-38/P30**; copy of order on charge dated 14.08.2024 and order dated 27.09.2024 is **Exhibit PW-38/P31** and the true copy thereof is **Exhibit PW-38/P32**.

FIR No. 102/2022, Police Station-Navi Baradari, Commissionerate Jalandhar

ix. PW-38 further testified that FIR No.102/2022 dated 28.08.2022, under Section 121-A,124-A,153-A,120-B of IPC and 66 (A), 66 (F) of IT Act was registered at Police Station: Navi Baradari Commissionerate, Jalandhar. Section 3 of Punjab Prevention of Defacement Property Act and Section 66 (A) of IT Act were invoked later on. As per FIR, on 28.08.2022, Inspector Anil Kumar along with other police officials were

present at Kamal Palace Hotel, Chowk, Jalandhar, wherein secret information was received that some unknown mischievous persons have written the words '*Khalistan Zindabad Hindustan Murdabad*' on the statue of Shaheed Beant Singh, former Chief Minister of Punjab, situated at BMC Chowk, Jalandhar, to create an anti-national movement for creating Khalistan. The secret informer also informed that he came to know from social media that this was planned by one Gurpatwant Singh Pannun who is a Khalistani supporter living abroad and wants to disturb the peace and harmony of Punjab. FIR was accordingly registered.

x. He deposed that during investigation, the said viral video was downloaded from the social media, saved in a pen drive and taken into possession. Further, on the basis of secret information Sam s/o Kashmir Singh, Raman @ Sonu and Lakhwinder Singh @ Lakha were arrested. On interrogation, Rama @ Sonu disclosed that some days ago Lakhwinder Singh @ Hargun contacted him and asked him to write '*Khalistan Zindabad*' on the statue of Beant Singh for which he received Rs.15000/- in cash and was promised Rs.7500/- later on. Accused Raman alias Sonu also disclosed that Bikramjit Singh Khalsa also called him through WhatsApp and asked him to write above words and for the said task, he had received Rs.60,000/- out of which he kept Rs.30,000/- with himself and Rs.15,000/- each was shared with other co-accused.

xi. PW-38 further deposed that on completion of investigation, Chargesheet was filed in the Court of Smt. Jyotika Sood JMIC/JAL on 05.12.2022. After obtaining the sanction from the Competent Authority and other relevant documents, supplementary Chargesheet U/S 173 (8) Cr.P.C. was prepared on 25.09.2023 and was submitted in the Court of Sh. K.K. Jain, Jalandhar on 26.09.2023. Further, charge has been framed by the Court and the case is at the stage of prosecution evidence. True copy of FIR in vernacular is **Exhibit PW-38/P33** and English translation thereof is **Exhibit PW-38/P34**; memo of production of pen drive is **Exhibit PW-38/P35** and English translation thereof is **Exhibit PW-38/P36**; pen drive containing video footage is **Exhibit PW-38/P37** and transcript thereof along with English translation is **Exhibit PW-38/P38**; true copy of statement of HC Amit Singh in vernacular along with English translation thereof are **Exhibit PW-38/P39** and **Exhibit PW-38/P40** respectively; true copy of Chargesheet in vernacular is **Exhibit PW-38/P41** and English translation thereof is **Exhibit PW-38/P42**; true copy of supplementary Chargesheet in vernacular is **Exhibit PW-38/P43** and English translation thereof is **Exhibit PW-38/P44**; copy of order framing charge dated 05.02.2024 is **Exhibit PW-38/P45** and true copy thereof is **Exhibit PW-38/P46**.

xii. PW-38 stated on oath that all the aforesaid 03 FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was already banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban was extended by Ministry of Home Affairs vide notification dated 08.07.2024 are continuously indulging in cession and secessionist activities in a clandestine manner. He was of the view that if the ban is not extended and if SFJ's unlawful activities are not curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

61. PW-39

i. **PW-39 Tejinder Pal Singh Brar**, PPS, Deputy Superintendent of Police, Sub Division Abohar, Fazilka, Punjab, tendered his affidavit **Exhibit PW-39/A** after due authorization by the Competent Authority. He deposed regarding FIR No.91/2020 dated 02.07.2020 u/s 153/153-A IPC, registered at PS Sadar Abohar,

Fazilka, Punjab. The said FIR is not mentioned in the Background Note but is relied upon as additional evidence. The contents of the affidavit are stated to be based on record revealed during the investigation as well as on his personal knowledge acquired during the course of his service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and have been marked as exhibits during the course of deposition.

FIR No. 91/2020, Police Station-Sadar Abohar, District Fazilka, Punjab

ii. PW-39 testified that FIR No.91/2020 dated 02.07.2020 was registered u/s 153,153-A IPC at P.S. Sadar Abohar, District Fazilka, Punjab after some pamphlets of anti-national and pro-Khalistani slogans like “*Sikha De Sare Masle Khalistan Vich Hi Hal Honge & Khalistan*” were pasted on the water tank (near Khalinda Ram Dhani). FIR was accordingly registered against unknown persons. Copy of the FIR annexed with affidavit is **Exhibit PW-39/P1** and English translation thereof is **Exhibit-PW-39/P2**.

iii. Witness deposed that during the investigation, pamphlet pasted on the water tank on Khalinda Ram Dhani road on which it was written “*Sikha De Sare Masle Khalistan Vich Hi Hal Honge and Khalistan*” was recovered. Copy of recovery memo of pamphlet dated 02.07.2020 is **Exhibit PW-39/P3** and English translation thereof is **Exhibit PW-39/P4**. Further, on the statement of Sukhdev Singh s/o Gurdev Singh, Resident of Dhani Karaka Singh, accused, namely (i) Surinder Kumar son of Gopi Ram, (ii) Mandeep Singh @ Vakil Singh son of Mander Singh, (iii) Lakhwinder Singh @ Lakhi son of Nachattar Singh, (iv) Harvinder Singh son of Baldev Singh, (v) Manprit Singh son of Vakil Singh residents of village Malookpura were nominated in the case vide Rapat No. 28 dated 03.07.2020. It is stated that pursuant to being named in FIR No. 91 of 2020 on 03.07.2020, accused Surinder Kumar s/o Gopi Ram, Mandeep Singh @ Vakil Singh s/o Mander Singh, Iqbal Singh and Juvenile Lakhwinder Singh @ Lakhi s/o Nachattar Singh were arrested. Further, raid was conducted by the police party at the residence of accused Surinder Kumar s/o Gopi Ram and Ten (10) Khalistani poster were recovered at his instance. True Copy of recovery memo of 10 Khalistani posters dated 06.07.2020 is **Exhibit PW-39/P5** and English translation thereof is **Exhibit PW-39/P6**.

iv. He further deposed that during the course of investigation, accused Surinder Kumar confessed and made a statement under Section 27 of Evidence Act that the Khalistani posters were affixed in village Malookpur by Mandeep Singh @ Killa s/o Mander Singh, Lakhwinder Singh @ Lakhi s/o Nachattar Singh, residents of village Malookpur. In respect of affixing of these posters, Iqbal Singh @ Ivan s/o Bikar Singh, r/o village Malookpur, Mandeep Singh @ Killa and Lakhwinder Singh @ Lakhi after affixing of these posters, informed Surinder Kumar through mobile phone. Copy of statement of Surinder Kumar under Section 27 Evidence Act dated 06.07.2020 is **Exhibit PW-39/P7** and English translation thereof is **Exhibit PW-39/P8**. True Copy of GD No.28 dated 03.07.2020 whereby accused were nominated as referred above is **Exhibit PW-39/P9** and English translation thereof is **Exhibit PW-39/P10**. Further, a raid for arrest of accused Iqbal Singh was conducted in terms of GD No.27 dated 06.07.2020. True Copy of GD No. 27 dated 06.07.2020 in vernacular is **Exhibit PW-39/P11** and English translation thereof is **Exhibit PW-39/P12**.

v. He deposed that after investigation by SSP Fazilka, incriminating evidence could not be found against accused Mandeep Singh @ Killa, Lakhwinder Singh @ Lakhi, Iqbal Singh @ Ivan, Harvinder Singh,

Manpreet Singh and Jaspal Singh and the same was recorded vide GD No.43 dated 15.07.2020. Copy of GD dated 15.07.2020 in vernacular is **Exhibit PW-39/P13** and English translation thereof is **Exhibit PW-39/P14**.

vi. He further stated that the Chargesheet was thereafter filed against Surinder Kumar son of Gopi Ram before the concerned Court on October 04, 2022. Copy of Chargesheet in vernacular is **Exhibit PW-39/P15** and English translation thereof is **Exhibit PW-39/P16**. Charge was framed against accused Surinder Kumar on March 16, 2023 and copy of the order on charge is **Exhibit-PW-39/P17**. The case is stated to be pending trial before the Court of JMIC, Abohar. Copy of order dated 02.09.2024 passed by the Trial Court is **Exhibit PW-39/P18** and the case was listed on 12.12.2024 for prosecution evidence.

vii. He further stated on oath that based on his personal knowledge acquired during the course of his service as a Police Officer, he fully agree with the conclusions derived by the Central Government that despite being banned for five years under the provisions of UAPA, SFJ, through various illicit and illegitimate ways and channels, has since 2019 continued its unlawful activities, which are prejudicial to internal security of India and public order, and have the potential of disrupting peace, the unity and integrity of the country.

62. PW-40

i. **PW-40 Harwinder Pal Singh**, DSP/SSOC/Amritsar, tendered his affidavit **Exhibit PW-40/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.03 of 2019 u/s 25 of Arms Act, 1959 registered at SSOC/Amritsar; FIR No.06 of 2020 u/s 124-A IPC, Sections 10A and 13(1) of Unlawful Activities (Prevention) Act, 1967, registered at SSOC/SAS Nagar; FIR No.07 of 2021 u/s 120B, 124A, 153, 153A, 153B IPC registered at SSOC/SAS Nagar, and FIR No.02 of 2024 u/s 153, 153-A, 505, 120-B IPC, registered at SSOC/SAS Nagar, mentioned at Serial No. 09, 15, 24, and 53 respectively of Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIRs. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 03/2019, PS- SSOC/Amritsar

ii. PW-40 testified that FIR No. 03 of 2019 under Section 25 of Arms Act, 1959 was registered at SSOC/Amritsar. Section 13 Unlawful Activities (Prevention) Act, 1967 was later on added on 18.03.2019. On receipt of secret information that Baljit Singh, Jagdev Singh @ Jagga and Manjit Singh, who are in possession of illicit weapons were planning to carry out a major criminal activity in the area, SI Sukhbir Singh raided the spot and arrested Baljit Singh, Jagdev Singh @ Jagga and Manjit Singh and recovered 02 Pistols 0.32 bore along with 03 Magazines and 14 live cartridges from their possession. The aforesaid FIR was accordingly registered. Copy of FIR in vernacular is **Exhibit PW-40/P1** and English translation thereof is **Exhibit PW-40/P2**; copy of seizure memos along with English translation thereof are collectively **Exhibit PW-40/P3**; copy of disclosure statement of Baljit Singh under Section 27 Evidence Act in vernacular along with English translation thereof is **Exhibit PW-40/P4**.

iii. He deposed that Chargesheet in the abovementioned case was filed on 27.05.2019 and charges under the Arms Act against the accused were framed on 03.09.2019. Investigation under Section 173(8) Cr.P.C.

with regard to offences under UAPA is still in progress. Copy of Chargesheet in vernacular along with English translation thereof is collectively **Exhibit PW-40/P5** and copy of order on charge dated 03.09.2019 is **Exhibit PW-40/P5A**.

FIR No. 6/2020, PS- SSOC (SAS Nagar), Punjab.

iv. PW-40 further testified that FIR No.6 of 2020 under Sections 124-A IPC, Sections 10A and 13(1) of Unlawful Activities (Prevention) Act, 1967 was registered at SSOC (SAS Nagar), on 10.04.2020, on receipt of complaint of DSP Rakesh Kumar Yadav regarding a pre-recorded audio message received by him which was sent by Gurpatwant Singh Pannun from an international number +18336101020 belonging to region of North America. In the said message, Gurpatwant Singh Pannun is instigating vulnerable Youth of Punjab by stating that Central & Punjab Government are torturing the youth by enforcing curfew (lockdown) during COVID-19 and advocated secession of Punjab from the union of India. Copy of the FIR annexed with affidavit is **Exhibit PW-40/P6** and English translation thereof is **Exhibit PW-40/P7**; copy of transcript of the pre-recorded audio message along with audio contained in pendrive is **Exhibit PW-40/P8**; copy of 'voice sample download memo' in vernacular along with English translation thereof and Certificate u/s 65-B of the Evidence Act, 1872 is collectively **Exhibit PW-40/P9**; copy of report of FSL Punjab regarding matching of specimen voice sample and question voice sample is **Exhibit PW-40/P10**; copy of the order dated 09.08.2024 declaring Gurpatwant Singh Pannun as proclaimed offender is **Exhibit PW-40/P11**. Preparation of the chargesheet in the case is stated to be under process and is likely to be shortly filed.

FIR No. 7/2021 PS- SSOC (SAS Nagar), Punjab.

v. PW-40 deposed that FIR No. 7 of 2021 under Section 120B, 124A, 153, 153A, 153B IPC was registered at SSOC (SAS Nagar). Later on, Section 17, 18 and 20 of Unlawful Activities (Prevention) Act, 1967 were invoked. The said FIR was registered by SI Manpreet Singh on receipt of secret information that Gurwinder Singh alias Baba, Jagwinder Singh, Sukhdev Singh alias Rinku and Jagjit Singh Mangat are putting up pro-Khalistan posters in Rupnagar, Mohali, Fatehgarh Sahib, Khanna and Ludhiana on which "*Punjab Referendum 2020*" is written. As per the secret information Gurpatwant Singh Pannun instructed Harpreet Singh alias Rana Singh, a resident of USA, Bikramjit Singh, a resident of USA and Gursahai Singh Makhu a resident of USA to provide financial help as well as all kind of other help to Gurwinder Singh alias Baba, Jagwinder Singh, Sukhdev Singh alias Rinku and Jagjit Singh Mangat to disturb peace in Punjab.

A copy of the FIR in vernacular is **Exhibit PW-40/P12** and English translation thereof is **Exhibit PW-40/P13**; copy of the recovery memo dated 17.09.2021 in vernacular along with English translation thereof is **Exhibit PW-40/P14**.

vi. He further deposed that during investigation, accused Gurwinder Singh disclosed that he had hidden the frames to print the posters of Khalistan, some printed Khalistani flags, posters and some other objectionable material in his tube well in his farm at village Lotto District Ludhiana. Based upon this disclosure, frames and spray paint were recovered. Copy of the disclosure statement dated 20.09.2021 along with English translation thereof is **Exhibit PW-40/P15**; copy of recovery memo dated 20.09.2021 along with English translation thereof is collectively **Exhibit PW-40/P16**; copy of Photographs recovered in FIR No.7/2021 is collectively **Exhibit PW-40/P17**.

vii. He deposed that the chargesheet in the case was filed u/s 123A, 153A, 153B, 120B IPC, 17, 18, 20 and 40 Unlawful activities Prevention Act 1967 against Gurwinder Singh @ Baba, son of Harpreet Singh, r/o house no. 84, Assapatti Rampur, Distt. Ludhiana, Jagwinder Singh s/o Gurmail Singh r/o H.No 16, Ward No. 13 Jogian Wala Mohalla, Morinda, Rupnagar, Sukhdev Singh @ Rinku son of Karnail Singh resident of Morinda Rupnagar, Jagjit Singh Mangat resident of Ludhiana and 06 others namely Gurpatwant Singh Pannun R/o USA, Harpreet Singh @ Rana R/o USA, Bikramjit Singh R/o USA, Gursahai Singh Makhu R/o USA, Rajinder Singh R/o USA & Kamal R/o USA, who are yet to be arrested. True copy of the Chargesheet along with English translation thereof is collectively **Exhibit PW-40/P18**. Charge in the present case has been framed and the trial is pending.

FIR No. 2/2024, Police Station-SSOC SAS Nagar, Punjab

viii. PW-40 deposed that FIR No.2/2024 dated 17.01.2024, u/s 153, 153-A, 505, 120-B IPC was registered at PS SSOC SAS Nagar by Inspector Sukhwinder Singh Mann, Counter Intelligence Patiala, on receipt of information that Jagdish Singh s/o Mangal Singh, Davinder Singh s/o Kulwant Singh, Manjit Singh s/o Kaka Singh, all resident of Patiala, have written slogans Khalistan Zindabad on the instructions of Gurpatwant Singh Pannun. Copy of FIR in vernacular is **Exhibit PW-40/P19** and English translation thereof is **Exhibit PW-40/P20**.

ix. He further deposed that during investigation, a saffron colored yellow cloth along with 05 bottle of spray was recovered. The same were taken into possession vide seizure memo dated 18.01.2024, which is **Exhibit PW-40/P21** along with English translation thereof. The video containing the clipping of Gurpatwant Singh Pannun along with transcript in English is **Exhibit PW-40/P22**. The video was provided by a reliable source. The chargesheet has been prepared and sanction from Department of Home Affairs & Justice, Punjab u/s 153-A IPC is awaited.

x. PW-40 further stated on oath that the aforesaid FIRs show that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cessation and secessionist activities. As such, he was of the view that if the ban to the SFJ is not extended or be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

63. PW-41

i. **PW-41 Babulal Meena**, Additional Superintendent of Police, GRP Circle Bikaner, District GRP Jodhpur (Rajasthan), tendered his affidavit **Exhibit PW-41/A** after due authorization by the Competent Authority. He deposed regarding FIR No.56/2023 dated 24.10.2023 under Sections 153A, 153B, 505 IPC registered at Police Station-GRP Hanumangarh, District-GRP (North) Jodhpur (Rajasthan), mentioned at Serial No. 94 of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIR mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 56/2023, Police Station-GRP Hanumangarh, District GRP (North) Jodhpur, Rajasthan

ii. PW-41 testified that FIR No. 56/2023 dated 24.10.2023 was registered at Police Station-GRP Hanumangarh, District- GRP (North) Jodhpur (Rajasthan) under Sections 153A, 153B, 505 IPC. Section

10(a), 13(1)(a) of Unlawful Activities (Prevention) Act, 1967 and Section 66F of IT Act were subsequently invoked. FIR No. 56/2023 was registered on receiving information from Jagat Narayan Chaudhary, Acting Superintendent Railway Station Hanumangarh Junction, who informed that on the wall next to the Road, towards the station, 'Khalistan Zindabad SFJ' was written in English by some unknown persons to spread unrest and create rebellion. Accordingly, a video was recorded by Computer Operator of GRP Police Station Hanumangarh Junction on 24.10.2023 in which a banner of 'Khalistan Zindabad' was written above Hanumangarh Railway Junction box. Copy of the FIR in vernacular along with English translation thereof is **Exhibit PW-41/P-1 (colly)**.

iii. He further deposed that during course of investigation, a viral video uploaded on YouTube came to notice. The video and photographs of the slogan 'Khalistan Zindabad SFJ' at the spot of incident were uploaded in a pen drive, which was seized vide seizure memo dated 25.10.2023. Transcription of the contents of the video in vernacular along with English translation thereof is **Exhibit PW-41/P-2 (colly)**. The video which had gone viral on WhatsApp group contained a voice of the recording as reflected in the transcription at Point A and Point B.

iv. Copy of the site map of the accident spot drawn in vernacular and English translation thereof is **Exhibit PW-41/P-3 (colly)**; copy of certificate under Section 65B Evidence Act of video (referred as CCTV in affidavit) in vernacular along with English translation thereof is **Exhibit PW-41/P-4 (colly)**; copy of Seizure Memo of pen drive containing viral video and photographs taken on the spot dated 25.10.2023 in vernacular along with English translation thereof is **Exhibit PW-41/P-5 (colly)**; pen drive containing the video is **Exhibit PW-41/P-6**; copy of statement of complainant Jagat Narayan Chaudhary recorded u/s 161 Cr.P.C. in vernacular along with English translation thereof is **Exhibit PW-41/P-7 (colly)**.

v. He testified that during investigation, Canal Colony Police, Bhatinda informed the Investigating Officer of the present case, that two accused namely, Love Preet Singh and Harman Preet Singh in FIR No.233/2023, PS: Canal Colony, Bhatinda had given a statement that they had written 'Khalistan Zindabad SFJ' at Hanumangarh Junction. It was also informed that during course of investigation by officials of PS: Canal Colony, Bhatinda, mobile phone of accused and motorcycle (Hero CD Deluxe) along with a plastic bag which was tied on the left side of the motorcycle was recovered vide Recovery Memo dated 03.12.2023. From the said bag, 3 spray cans and a saffron cloth was also recovered on which 'Khalistan Zindabad SFJ' was written.

vi. He deposed that after investigation, both the accused were arrested and investigation revealed that accused had done the act consciously and also reflects their active involvement in secessionist Khalistani Movement for which they were funded and motivated by SFJ. CID (Special Branch) also conducted an inquiry and filed its report dated 02.02.2024, which stated that the accused were involved in similar activities in the past i.e. FIR 233/2023 dated 03.12.2023 PS Canal Colony, Bhatinda, Punjab; FIR 119/2023 dated 29.11.2023, PS GRP Amritsar, Punjab and FIR No.73/2023 dated 06.12.2023 P.S. GRP Bhatinda Punjab. Both the accused participated in pro Khalistani activities for which they received monetary gain. Copy of Recovery Memo of mobile, motorcycle, 3 spray cans and saffron cloth dated 03.12.2023 in vernacular along with Hindi and English Translation thereof is **Exhibit PW-41/P-8 (colly)**; copy of Arrest Memo of accused

Harman Preet Singh and Love Preet Singh in vernacular along with English translation thereof are **Exhibit PW-41/P-9 (colly)**; copy of the Inquiry Report of accused Love Preet Singh and Harman Preet Singh in vernacular along with English translation thereof is **Exhibit PW-41/P-10 (colly)**; copy of the Inquiry Report by CID in respect of both the accused in vernacular along with English translation thereof is **Exhibit PW-41/P-11 (colly)**.

vii. PW-40 deposed that the investigation is still continuing and bail application of both the accused was rejected by the concerned Court of Additional Sessions Judge and was later on allowed by the Hon'ble High Court of Rajasthan (Principal Bench Jodhpur). Copy of rejection of bail application by the ASJ, Bikaner in vernacular along with English translation thereof is **Exhibit PW-41/P-12 (colly)**; copy of order of the Hon'ble High Court of Rajasthan granting bail to the accused is **Exhibit PW-41/P-13**.

viii. The witness further stated on oath that the FIR and allegations made against Gurpatwant Singh Pannu and his organization SFJ after it was already banned in 2019, shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cessation and secessionist activities. PW-41 expressed the view that if the ban to the SFJ is not extended or be curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

64. PW-42

i. **PW-42 Jitendra M. Yadav**, Deputy Superintendent of Police, Sabarmati Central Jail, Ahmedabad, Gujarat, tendered his affidavit **Exhibit PW-42/A** after due authorization by the Competent Authority. He deposed that he was the Supervisory Officer of FIR No.11191067230030/23 dated 11.03.2023 under Sections 153A, 153B(1)(c), 505(1)(b), 120B IPC, 66F of IT Act and Section 16(1)(b) of the Unlawful Activities Prevention Act, 1967 registered at PS: Cyber Crime, Ahmedabad City and FIR No. 11191067230127/23 dated 28.09.2023, Sections 121A, 153A, 153B(1)(c), 505(1)(b), 120B IPC; Section 66F of IT Act and Section 16(1)(a) of the Unlawful Activities (Prevention) Act registered at PS: Cyber Crime, Ahmedabad City, mentioned at Serial No.69 and 70 of the Background Note. He stated that FIR No. 11191067230127/23 at serial No.70 in the Reference/Background Note is typed wrongly as FIR No. 11191067230 instead of 11191067230127. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIRs mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 11191067230030/23, Police Station-Cyber Crime, Ahmedabad City

ii. PW-42 testified that FIR No.11191067230030/2023 dated 11.03.2023 was registered at Police Station: Cyber Crime. As per FIR, on 07.03.2023, an input was received from Special Branch to keep vigilance on social media for any activity which may endanger VVIP Security for India and Australia Test Match at Narendra Modi Cricket Stadium, which was scheduled to take place on 09.03.2023. On 08.03.2023, information was received that many people in Ahmedabad received 2 pre-recorded English voice clips from various mobile numbers. The 1st pre-recorded voice clip read as follows: "*People of Gujarat, on the March 9th, stay home and stay safe, because Pro-Khalistan Sikhs are going to storm Narendra Modi cricket Stadium*

and install Khalistan flags. Do not become victim between Pro-Khalistan Sikhs and Indian police. Modi is responsible for the deaths of thousands of Sikh farmers in Punjab and we are out to show Honourable Australian Prime Minister Anthony Albanese that Modi is a killer of Muslims in 2002 and he is the killer of Sikhs. People of Gujarat stay home. Stay safe. Pro-Khalistan Sikhs are going to storm the cricket stadium". The 2nd pre-recorded voice clip in verbatim stated "*People of Gujarat. Messages from Sikhs for Justice. General Counsel Gurpatwant Singh Pannu. Stay home. Stay safe. Pro Khalistan. Sikhs are going to raise Khalistan flag during the cricket match. Please do not fall prey to this false security which Gujarat police is providing. We will install Khalistan flag today. Our tomorrow. Stay home. Stay safe.*"

Accordingly, the aforesaid FIR was registered at PS: Cyber Crime under Sections 153A, 153B(1)(c), 505(1)(b), 120B IPC; 66F of IT Act and Section 16(1)(b) of the Unlawful Activities (Prevention) Act, 1967. Copy of the letter received from Special Branch dated 07.03.2023 in vernacular, along with English translation thereof and the copy of secret input are **Exhibit PW-42/P-2, Exhibit PW-42/P-3 and PW-42/P-4** respectively. Copy of the FIR in vernacular is **Exhibit PW-42/P-5** and English translation thereof is **Exhibit PW-42/P6**.

iii. He further deposed that based on the technical analysis of the mobile numbers which were used to broadcast the pre-recorded voice clips, two persons namely Rahul Kumar and Narendra Kumar were arrested on 13.03.2023, who were running illegal GSM Gateway through which they were providing Voice Over Internet Protocol (VOIP). Through their GSM Gateway's mobile numbers, aforesaid threatening calls were relayed. Accused Rahul Kumar revealed that while working in Dubai, he met one Mohsin in VOIP Business Group on WhatsApp, who asked him to start a business of International VOIP calling through GSM Gateway. For this, Mohsin delivered the SIM Cards necessary to run the said business and gave contact of one Hussain from Uttar Pradesh and another person from Bangladesh to facilitate configuration of GSM Gateway Setup. Thereafter, Rahul Kumar roped his childhood friend Narendra Kushwaha to help him in the business. Accused Rahul Kumar purchased more GSM Gateway from Yogendra Singh, Rohtas Diwakar, Pankaj Gupta and Sharad Kumar.

iv. Copy of statement of accused Rahul Kumar in vernacular along with English translation thereof are **Exhibit PW-42/P-7 & Exhibit PW-42/P-8** respectively; copy of statement of accused Narendra Kushwaha in vernacular along with English translation thereof are **Exhibit PW-42/P-9 and Exhibit PW-42/P10** respectively; copy of statement of witnesses Yogendra Singh in vernacular along with English translation thereof are **Exhibit PW-42/P-11 and Exhibit PW-42/P-12** respectively; copy of statement of witness Rohtas Diwakar in vernacular along with English translation thereof are **Exhibit PW-42/P-13 and Exhibit PW-42/P-14** respectively; copy of statement of witness Pankaj in vernacular along with English translation thereof are **Exhibit PW-42/P-15 and Exhibit PW-42/P-16** respectively; copy of statement of witness Sharad Kumar in vernacular along with English translation thereof are **Exhibit PW-42/P-17 and Exhibit PW-42/P-18** respectively; copy of statement of other witness Jaydeep Kumar in vernacular along with English translation thereof are **Exhibit PW-42/P-19 and Exhibit PW-42/P-20** respectively; copy of statements of witness Manish dated 14.04.2023, 13.05.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-21 and Exhibit PW-42/P-22** respectively; copy of statement of witness Ravindra Singh in vernacular

along with English translation thereof are **Exhibit PW-42/P-23** and **Exhibit PW-42/P-24** respectively; copy of statement of witness Dharmesh Jagdish Bhai Sheth in vernacular along with English translation thereof are **Exhibit PW-42/P-25** and **Exhibit PW-42/P-26** respectively; copy of statement of witness Meghdut in vernacular along with English translation thereof are **Exhibit PW-42/P-27** and **Exhibit PW-42/P-28** respectively.

v. PW-42 further testified that during investigation, 11 GSM Gateways (SIM BOX), 06 mobile phones, 02 laptops, 03 routers, 01 CPU and 01 monitor were seized from 3rd Floor opposite BSNL office in Madhya Pradesh and from House No.30/11 Padra, District Reeva, Madhya Pradesh of the accused were found. The Panchnama's were prepared on 13.03.2023 and 17.03.2023. It was also revealed that accused had kept another GSM Gateway at the house of a friend Shравan Patel. Accordingly, on 19.03.2023, 02 more GSM Gateways (SIM BOX), 01 Router and 1 mobile were recovered from the house of Shравan Patel at Reeva Madhya Pradesh.

vi. Copy of Panchnama/Seizure Memo completed on 13.03.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-29** and **Exhibit PW-42/P-30** respectively. There appears to be a slight error in English translation thereof as the requisite details after para 3 and para 19 appear to be inadvertently missed. Copy of Panchnama/Seizure Memo completed on 17.03.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-31** and **Exhibit PW-42/P-32** respectively. Copy of Panchnama/Seizure Memo completed on 19.03.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-33** and **Exhibit PW-42/P-34** respectively.

vii. He deposed that during further investigation, three more accused were found running illegal GSM Gateways, namely Ummed Ansari, Mashid Khan and Mohammad Sahid. Accused Ummed Ansari started the said illegal activity when he saw a post on Facebook regarding a work from home job. On sending a message showing his interest for the same, Ummed Ansari received a voice message in which one person, who identified himself as Ahmed from Dubai asked him to run GSM gateway from his home and earn monthly income. Ummed Ansari agreed due to which Ahmed delivered GSM gateways, routers and SIM Cards to him and configured the Gateway through Team Viewer Application. It was from this Gateway, pre-recorded voice clip mentioned in the FIR was relayed to many Indian Mobile Numbers. Accordingly, on 01.04.2023, 03 GSM Gateways (SIM BOX), 03 router and 03 mobile phones were recovered from the house of Ummed's sister at Modinagar, Bisokar, Ghaziabad, Uttar Pradesh and on 05/04/2023, 1 mobile was seized from accused Ummed Ansari.

viii. He further deposed that similarly, other two accused Mashid Khan and Mohammad Sahid were running illegal GSM Gateways through which pre-recorded voice clip mentioned in the FIR was relayed. This set up was installed at Mashid Khan's house located in Bhiwandi, Maharashtra by absconding accused Abu Bakar Shakil Ahmed Kureshi. 04 GSM Gateways (SIM BOX), 03 Routers, 03 Mobile phones, 01 Laptop and 509 SIM cards were recovered from the House of Accused Mashid Khan on 02.06.2023. Copy of Panchnama/Seizure Memo completed on 01.04.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-35** and **Exhibit PW-42/P-36** respectively. Inadvertently in the English translation thereof, the date has not been mentioned at the bottom. Copy of Panchnama/Seizure Memo completed on 05.04.2023

in vernacular along with English translation thereof are **Exhibit PW-42/P-37** to **Exhibit PW-42/P-38** respectively. Copy of Panchnama/Seizure Memo completed on 02.06.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-39** and **Exhibit PW-42/P-40** respectively.

ix. PW-42 deposed that on completion of investigation, accused Umed Ansari, Mashid Khan and Mohammad Sahid were arrested on 05.04.2023, 02.06.2023 and 02.06.2023 respectively. Chargesheet was filed against all the five accused Rahul Kumar, Narendra Kumar, Umed Ansari, Mashid Khan and Mohammad Sahid on 04.09.2023. Co-accused mentioned in the Chargesheet including Gurpatwant Singh Punnun and Mohsin from Dubai are absconding.

Copy of Chargesheet dated 04.09.2023 in vernacular along with English translation thereof are **Exhibit PW-42/P-41** and **Exhibit PW-42/P-42** respectively.

x. He further stated that currently, all the five accused who had been arrested, are in judicial custody. The bail application of accused Umed Ansari and Mashid Khan was dismissed. Accused Rahul Kumar and Mohammad Shahid withdrew their bail application which was filed before Gujarat High Court. Copy of the orders passed by the High Court of Gujarat are **Exhibit PW-42/P-43** to **Exhibit PW-42/P-46**. The charge has been framed against the accused on 06.09.2024 and the case is at the stage of prosecution evidence. Copy of order passed by the Trial Court framing charge in vernacular along with English translation thereof are **Exhibit PW-42/P-47** and **Exhibit PW-42/P-48** respectively.

FIR No. 11191067230127/23 was registered at Police Station Cyber Crime, Ahmedabad City,

xi. PW-42 testified that FIR No.11191067230127/23 under Sections 121A, 153A, 153B(1)(c), 505(1)b, 120B IPC; Section 66F of IT Act and Section 16(1)(a) of the Unlawful Activities (Prevention) Act was registered at Police Station Cyber Crime. As per FIR, on 28.09.2023, before the India and Pakistan World Cup Match at Narendra Modi Stadium Ahmedabad, an information was received at Cyber Crime Police station, Ahmedabad city that many people in the city have received a pre-recorded audio clip from an unknown mobile number +447418343648 stating "*India, on 5th October, from Modi Stadium in Ahmedabad, it will not be start of World Cricket Cup, this will be the beginning of World Terror Cup. Sikhs for Justice is going to storm Ahmedabad with Khalistan flag. We are going to take revenge of Shaheed Nijjar's assassination. We are going to use ballot against your bullets. We are going to use vote against your violence. Remember, 5th October, it will not be World Cricket Cup, it will be the beginning of World Terror Cup. This Message is from Gurpatwant Singh Pannun, the General Counsel*". Accordingly, the present FIR was registered on 28.09.2023 at Police Station: Cyber Crime, Ahmedabad City after registration of the earlier FIR in March, 2023. Copy of the FIR annexed with affidavit in vernacular along with English translation thereof are **Exhibit PW-42/P-49** and **Exhibit PW-42/P-50** respectively.

xii. He further deposed that during investigation, it was found that from International Long Distance (ILD) Carrier of mobile number +447418343648, calls were made using Carrier service of Quickom Telecom Limited of Hong Kong and Dextatel OU of Estonia, Europe. As no further details about the user could be obtained, a Final Report was filed in the Court on 03.04.2023 since the accused could not be traced. The same was accepted by the Competent Court on 22.06.2024. Copy of the Final Report in vernacular along with English translation thereof are **Exhibit PW-42/P-51** and **Exhibit PW-42/P-52** respectively; copy of order

dated 22.06.2024 in vernacular along with English translation thereof are **Exhibit PW-42/P-53** and **Exhibit PW-42/P-54** respectively.

xiii. The witness stated on oath that both the aforementioned FIRs reflect allegations against Gurpatwant Singh Pannun and his organization SFJ, after it was already banned in 2019 which shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cessation and secessionist activities. He stated that he was of the view that if the ban on SFJ is not extended or curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

65. PW-43

i. **Shri Sumit Kumar**, Superintendent of Police, GRP, Ambala Cantt., Haryana, tendered his affidavit **Exhibit PW-43/A** after due authorization by the Competent Authority. He is the Supervisory Officer of FIR No.48/2023 dated 05.09.2023 under Sections 120B, 124A, 153B IPC, and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at PS: GRP, Kurukshetra, mentioned at Serial No.68 of the Background Note. He further deposed that he is also the Supervisory Officer of FIR No.43/2022 dated 09.08.2022 under Section 2 of the Prevention of Insults to National Honour Act, 1971, registered at PS: GRP Sirsa. FIR No. 43/2022 is not mentioned in the Background Note but is relied upon as additional evidence. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 20 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 48/2023, Police Station-GRP Kurukshetra, Haryana

ii. PW-43 testified that FIR No.48/2023 dated 05.09.2023 u/s 120B, 124A, 153B IPC, Section 13 Unlawful Activities (Prevention) Act, 1967 was registered at P.S. GRP Kurukshetra. As per FIR, on 05.09.2023, SI Kamal Kumar, No.733/GRP during patrolling received a video clip from SHO, PS: GRP Kurukshetra whereby he informed that the video clip pertains to Gurpatwant Singh Pannun Incharge of SFJ wherein he is advocating writing of slogans in respect of Khalistan. He further directed to check the same in the area. In the meantime, LSI Parwinder Kaur, No.67 informed that slogan had been written in Punjabi 'G-20 (Punjab India da hissanahi)'. Also, 'SFJ' was written in English. Further, on the wall of Railway quarters, slogan was written 'G-20 Punjab is not India'. Also, at another place it was written 'Gurpatwant Singh Pannun SSI-IAISFJ'. The same matched with the video clipping, which was received from the SHO. Accordingly, the FIR was registered since it advocated sedition.

iii. Copy of FIR annexed with affidavit in vernacular is **Exhibit PW-43/A1** and English translation thereof is **Exhibit PW-43/A2**. Copy of Statement of Constable Soni Ram under Section 161 Cr.P.C. in vernacular is **Exhibit PW-43/A3** and English translation thereof is **Exhibit PW-43/A4**; copy of Statement of SI Kamal Kumar under Section 161 Cr.P.C. in vernacular is **Exhibit PW-43/A5** and English translation thereof is **Exhibit PW-43/A6**.

iv. He further deposed that during investigation, information was received from Delhi Police that an accused Malak Singh @ Malik had disclosed in FIR No.705 dated 28.09.2023 registered at PS: Kashmiri

Gate under section 153, 153A, 153B, 120B IPC, Section 3 of Delhi Prevention of Defacement of Public Property Act, 2007 (mentioned at Serial No.89 of the Reference Note) that he is involved in the present case. Accordingly, SI Om Parkash filed an application for production warrants of the accused before the Competent Court. The accused was interrogated on 07.12.2023 and formally arrested in the present FIR. Copy of Arrest Memo of accused Malak Singh @ Malik in vernacular is **Exhibit PW-43/A7** and English translation thereof is **Exhibit PW-43/A8**.

v. He deposed that accused Malak Singh @ Malik also made a disclosure statement on 08.12.2023 and identified the place of occurrence. An empty can of spray paint was recovered at his instance, which was used by him for writing the slogans. Also, statements of two witnesses were recorded under Section 161 Cr.P.C. Copy of Seizure Memo dated 08.12.2023 in vernacular is **Exhibit PW-43/A9** and English translation thereof is **Exhibit PW-43/A10**. Copy of Disclosure Statement made by accused Malak Singh @ Malik is **Exhibit PW-43/A11** and English translation thereof is **Exhibit PW-43/A12**; copy of statement of SI Sohan Lal under Section 161 Cr.P.C. in vernacular is **Exhibit PW-43/A13** and English translation thereof is **Exhibit PW-43/A14**; copy of statement of SI Pal Singh, No.263, PS: GRP Kurukshetra under Section 161 Cr.P.C. in vernacular is **Exhibit PW-43/A15** and English translation thereof is **Exhibit PW-43/A16**. Final Report/Chargesheet under Section 173 Cr.P.C. dispatched on 20.01.2024 is **Exhibit PW-43/A17** and English translation thereof is **Exhibit PW-43/A18**.

The case is stated to be fixed for prosecution evidence for 19.12.2024.

FIR No. 43, Police Station- GRP Sirsa, Haryana

vi. PW-43 testified that FIR No.43/2022 dated 09.08.2022 u/s 2 of Prevention of Insults to National Honour Act, 1971 was registered at PS: GRP Sirsa. As per the FIR, on 31.07.2022, a video was uploaded on social media showing that Gurpatwant Singh Pannun is threatening the Chief Minister and Home Minister of Haryana Government for daring to hoist the tricolor on 15th August. He promised to pay Rs.1.25 crore to unemployed individuals for joining his campaign. Gurpatwant Singh Pannun also threatened to burn the tricolor in front of trains in Haryana from 13th August to 15th August. Also, a tricolor could be seen burning on a railway track in the said video. An FIR was accordingly registered under Section 2 of The Prevention of Insults to National Honour Act, 1971. A copy of FIR annexed with affidavit in vernacular is **Exhibit PW-43/A19** and English translation thereof is **Exhibit PW-43/A20**.

vii. He further deposed that during investigation, the call details/tower dump were received by Cyber Cell Ambala on the NIC mail of the police station, which was taken into possession by IO through seizure memo on 14.09.2022. Copy of the statement of SI Satbir Singh under Section 161 Cr.P.C. in this regard in vernacular is **Exhibit PW-43/A21** and English translation thereof is **Exhibit PW-43/A22**. Copy of Memo of production of call detail records dated 14.09.2022 in vernacular is **Exhibit PW-43/A23** and English translation thereof is **Exhibit PW-43/A24**.

viii. He deposed that despite investigation, the accused could not be traced. Accordingly, Final Report/Untrace Report in this regard was filed before the concerned Court. of Final Report/Untrace Report dated 05.10.2022 in vernacular is **Exhibit PW-43/A25** and English translation thereof is **Exhibit PW-43/A26**.

ix. The witness stated on oath that the aforesaid FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it has already been banned in 2019. The FIRs reflect that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. He was of the view that if the ban against SFJ is not extended, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country. It will also escalate subversive activities including attempts to carve out Khalistan by separating territory of Punjab from the territory of Union of India.

66. PW-44

i. **PW-44 Manoj Kumar Katyal**, Additional Superintendent of Police, PTC, Narendra Nagar, Uttarakhand, tendered his affidavit **Exhibit PW-44/A** after due authorization by the Competent Authority. He deposed regarding FIR No.299/2018 under Section 153B, 505 IPC and Section 66 of the Information Technology (Amendment) Act, 2008, registered at PS: Khatima, District: Udham Singh Nagar, mentioned at Serial No.71 of the Background Note. He further deposed regarding FIR No.134/2023 under Section 66F of the Information Technology (Amendment) Act, 2008; Sections 153A, 505 IPC; and Sections 13, 15, 16, 20, 38, and 39(2) of the Unlawful Activities (Prevention) Act, 1967, registered at PS: Ramnagar, District Nainital, Uttarakhand, which is adduced as additional evidence. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIRs mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 134/2023, Police Station-Ramnagar, District Nainital, Uttarakhand

ii. PW-44 testified that FIR No.134/2023 was registered at Police Station Ramnagar, District-Nainital, Uttarakhand. As per the FIR, G-20 Conference was proposed to be held from 28.03.2023 to 30.03.2023 under the jurisdiction of Ramnagar Police Station and as such security arrangement in this regard was an important concern. On 26.03.2023, two calls were received by Inspector Arun Kumar Saini, SHO, PS: Ramnagar on his mobile number and another call was received on the number of PS: Ramnagar, wherein a pre-recorded audio message was heard as follows:

“G-20 delegates, Ramnagar is not India, Ramnagar is Khalistan. Sikhs for Justice is raise flag of Khalistan during G-20 summit at Ramnagar, at airport, at railway station to show internationalize that Ramnagar will be part of Khalistan. Once we liberate Punjab from Indian occupation through Khalistan freedom and if Chief Minister Dhami try to file the cases against Sikhs in Uttarakhand, you will be held accountable for each crime you are committing. Message is from Gurpatwant Singh 'Pannu' SFJ General Council.”

On enquiry, it was found that the said audio call was circulated to other police and administrative officials on various dates from different mobile numbers. Accordingly, the said FIR was registered. A copy of the FIR in vernacular is **Exhibit PW-44/P2** and English translation thereof is **Exhibit PW-44/P3**.

iii. He deposed that the CDR of mobile number of Inspector Arun Kumar Saini as well that of PS: Ramnagar was obtained whereby it was revealed that a call of 60 seconds was received from 02 mobile numbers on Inspector Arun Kumar Saini and a call of 60 seconds was received from a mobile number on the

number of PS: Ramnagar. Consequently, trunk route chart of the mobile numbers was obtained along with domain session IDs for the ILD gateway. On perusal of record, it was further revealed that out of the 03 mobile numbers from which pre-recorded audio message calls were received, 02 were inactive while the third mobile number belonged to one Mohsin, resident of Meerut, UP. During further investigation, Mohsin was found to be of unsound mind undertaking treatment at L.L.R.M. Medical College, Meerut.

iv. Copy of relevant extracts of CDR is **Exhibit PW-44/P4**. Copy of System Generated Report received from Vodafone Idea, Call Data Records is **Exhibit PW-44/P5**. Copy of the statement of the informant/Inspector Arun Kumar Saini in vernacular is **Exhibit PW-44/P6** and English translation thereof is **Exhibit PW-44/P7**. Copy of the audio message contained in the pen drive is **Exhibit PW-44/P8**; copy of certificate under Section 65B of Indian Evidence Act in vernacular along with English translation thereof are **PW-44/P9 and Exhibit PW-44/P9A**; copy of the transcript of the audio message is **Exhibit PW-44/P10**. The investigation in the aforesaid FIR is stated to be pending. Report in this regard in vernacular is **Exhibit PW-44/P11**. The English translation thereof is **Exhibit PW-44/P12**.

FIR No. 299/2018, Police Station-Khatima, District Udham Singh Nagar, Uttarakhand

v. PW-44 deposed that FIR No.299/2018 under Sections 153B and 505 IPC and Section 66 of the Information Technology (Amendment) Act, 2008 was registered at Police Station Khatima, District Udham Singh Nagar. As per FIR, on 04.09.2018, an information was received by SSI Shri Devender Gaurav, PS: Khatima that SFJ is misusing cyberspace to radicalize gullible youth of Sikh populated in Village Khatima, Udham Singh Nagar, Uttrakhand through various WhatsApp and other social media platforms. Consequently, SSI Devender Gaurav along with other local police officials visited Village Jadhampur, PS: Khatima and on inquiry it was found that Harjeet Singh @ Boby Bhinder was the admin of a WhatsApp group named '20-20 Khalistan Referendum' which was created on 03.06.2016 and is connected to prominent terrorist organization. Further the same follows pro-Khalistani propaganda. The copy of the FIR in vernacular is **Exhibit PW-44/P13** and English translation thereof is **Exhibit PW-44/P14**; copy of statement of SI Gopal Ram Chandel in vernacular is **Exhibit PW-44/P15** and English translation thereof is **Exhibit PW-44/P16**.

vi. He deposed that during investigation, accused Harjeet Singh was interrogated and his statement was recorded, wherein he disclosed that he had two groups on his mobile containing two SIM cards, namely, '20-20 Khalistan Referendum' and 'Bhander Commando'. He further disclosed that he is the admin of said groups which contain 40-50 members. The said group was stated to be created by Kulwinder Singh. Copy of statement of accused Harjeet Singh in vernacular is **Exhibit PW-44/P17** and English translation thereof is **Exhibit PW-44/P18**.

vii. The witness deposed that Kulwinder Singh in his statement disclosed that he had created 20-20 Khalistan Referendum Group on his mobile phone and was inspired by the videos sent to him on his WhatsApp on Khalistan Movement by Chief Organiser of Active Sikh Organisation on 1984 riots. Further, he used to share those videos. He also stated that Harjinder Singh was made as the second Admin. The Screenshots of WhatsApp group message of the mobile phones recovered from the above accused contained messages written in Gurumukhi. Accordingly, the Screenshots were translated by witness Hardev Singh and

Devandra Singh. The mobile phones recovered from the accused were sent to CFSL Chandigarh on 19.09.2018 and report dated 31.12.2018 reflects the retrieval of 2020 Khalistan Referendum WhatsApp Group.

viii. Copy of statement of accused Kulwinder Singh in vernacular is **Exhibit PW-44/P19** and English translation thereof is **Exhibit PW-44/P20**. Copy of the screenshot of the WhatsApp Group is collectively **Exhibit PW-44/P21**. Copy of statement of Hardev Singh in vernacular is **Exhibit PW-44/P22** and English translation thereof is **Exhibit PW-44/P23**. A true copy of the Certificate of Translator Devandra Singh on 22.08.2019 in vernacular is **Exhibit PW-44/P24** and English translation thereof is **Exhibit PW-44/P25**. Copy of the Recovery Memo of mobile phones from accused Kulwinder Singh and Harjeet Singh in vernacular is collectively **Exhibit PW-44/P26** and English translation thereof is **Exhibit PW-44/P27 (colly)**. Copy of report of CFSL dated 31.12.2018 is **Exhibit PW-44/P28**.

ix. The witness further deposed that on completion of investigation, chargesheet dated 03.08.2019 was filed before the Competent Court and cognizance was taken. True copy of Chargesheet dated 03.08.2019 in vernacular along with English translation thereof are **Exhibit PW-44/P29** and **Exhibit PW-44/P30** respectively. The certified copy of order dated 22.10.2019 taking cognizance, in vernacular is **Exhibit PW-44/P31** and English translation thereof is **Exhibit PW-44/P32**.

x. He further testified that accused Harjeet Singh was released on bail vide order dated 31.05.2024 and the case is pending trial before the Court of Additional Civil Judge/Judicial Magistrate, Khatima, District Udham Singh Nagar for framing of charge. The case was lastly listed on 29.10.2024. The charge has since been framed against the accused. Copy of order dated 31.05.2024 in vernacular is **Exhibit PW-44/P33** and English translation is **Exhibit PW-44/P34**; copy of last order dated 29.10.2024 in vernacular is **Exhibit PW-44/P35** and English translation thereof is **Exhibit PW-44/P36**.

xi. PW-44 stated on oath that Gurpatwant Singh Pannun and his organization SFJ continue the secessionist activities after it was already banned in 2019. He expressed the view that if the ban on SFJ is not extended or its activities curbed and controlled immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

67. PW-45

i. **PW-45 Sandeep Pathania**, Station House Officer (SHO), PS Dehra, District Kangra, Himachal Pradesh, tendered his affidavit **Exhibit PW-45/P1** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.207/2023, under Section 153 IPC and Section 3 of the Prevention of Damage to Public Property Act, 1984, which is to be correctly read as Section 3 of the Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 registered at PS Dehra, District Kangra, Himachal Pradesh, mentioned at Serial No.76 of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIR mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 207/2023, Police Station-Dehra, District Kangra, Himachal Pradesh

- ii. PW-45 testified that FIR No. 207/2023 under Sections 153 IPC, and Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 was registered at Police Station: Dehra, District Kangra, Himachal Pradesh. Section 13 of Unlawful Activities (Prevention) Act, 1967 was invoked subsequently. The aforesaid FIR was registered on the statement of one Shri Narendra Kumar Sharma, who stated that on 29.11.2023, he got a call from his Manager, Yograj at around 9.48 am that some unknown persons have written Khalistan slogans on the shutter installed in the building below his hotel. On receiving the call, Narendra Sharma went to the said building and saw that '*SHAH HIMACHAL BANAGAY KHALISTAN*' was written on shutter no. 5 of the building and '*SHAHEED BHINDRAN VALE ZINDAVAD KHALISTAN ZINDAVAD HIMACHAL BANA GAYA KHALISTAN*' was written in black front on shutter no.6 with the intention of creating enmity between Hindu and Sikh religions. Accordingly, the FIR was registered on 29.11.2023. The copy of the FIR in vernacular is **Exhibit PW-45/P2** and English translation thereof is **Exhibit PW-45/P3**. Copy of General Diary entry dated 29.11.2023 in vernacular along with English translation thereof is **Exhibit PW-45/P3A**. Copy of statement of complainant/Narendra Kumar Sharma in vernacular is **Exhibit PW-45/P4** and true English translation thereof is **Exhibit PW-45/P5**.
- iii. He further deposed that during investigation, the spot was inspected and site plan (spot map) was prepared. Photographs were also clicked. The ink/paint which was used to write the slogans along with the control sample were taken into possession vide Seizure Memo dated 29.11.2023. The statement of spot witnesses was recorded. Further, the CCTV footage of the nearby area was checked. On the basis of investigation, it was revealed that three accused were involved in the incident. The accused had gone to Urvashi Hotel and Restaurant at Chintpurni. Accordingly, Shri Vikrant Sood, owner of the hotel was interrogated. Visitor slips along with photocopies of the Aadhaar cards of the accused who had stayed in the Hotel as well as license of Urvashi Hotel were taken into possession vide Seizure Memo dated 29.11.2023. CCTV footage of Urvashi Hotel confirmed the stay of accused. The CCTV footage of nearby Hotel Sagar Ratna was uploaded in a pen drive and taken into possession vide seizure memo dated 04.12.2023.
- iv. Copy of site plan (spot map) in vernacular along with English translation thereof is **Exhibit PW-45/P6**; copy of photographs of the shutters is **Exhibit PW-45/P7**; copy of Seizure Memo dated 29.11.2023 in respect of paint and control sample in vernacular is **Exhibit PW-45/P8**. English translation thereof is **Exhibit PW-45/P9**; copy of supplementary statement of Narendra Kumar Sharma in vernacular along with English translation thereof is **Exhibit PW-45/P10**; copy of statement of Yograj in vernacular along with English translation thereof is **Exhibit PW-45/P11**; copy of Seizure Memo of visitors slip, Aadhar Card and hotel licence dated 29.11.2023 in vernacular is **Exhibit PW-45/P12**. English translation thereof is **Exhibit PW-45/P13**; copy of statement of Mr.Vikrant Sood in vernacular is **Exhibit PW-45/P14** and English translation thereof is **Exhibit PW-45/P15**; copy of statement of Constable Vikas Guleria No.1145 under Section 161 Cr.P.C. in vernacular is **Exhibit PW-45/P16** and English translation thereof is **Exhibit PW-45/P17**; copy of Seizure memo of Pen Drive containing CCTV footage of Urvashi Hotel in vernacular is **Exhibit PW-45/P18** and English translation thereof is **Exhibit PW-45/P19**; copy of statement of Vikas Sharma in vernacular along with English translation thereof is **Exhibit PW-45/P20**; copy of supplementary

statement of Vikrant Sood in vernacular along with English translation thereof is **Exhibit PW-45/P21**; copy of statement of Constable Pushpinder Singh in vernacular along with English translation thereof is **Exhibit PW-45/P22**; copy of the Seizure Memo dated 04.12.2023 of pen drive containing CCTV footage of the area outside Hotel Sagar Ratna in vernacular is **Exhibit PW-45/P23**. English translation thereof is **Exhibit PW-45/P 24**; copy of statement of Ramesh Kumar in vernacular along with English translation thereof is **Exhibit PW-45/P25**; copy of the statement of Jaswinder Singh in vernacular along with English translation thereof is **Exhibit PW-45/P26**; copy of the statement of Constable Pawan Kumar in vernacular along with English translation thereof is **Exhibit PW-45/P27**.

v. He testified that based on CDR and location of mobile numbers of accused, joint police team of Police Station Dehra and Police Station Chintpurni searched the area of Gauraya, District Jalandhar, Punjab on 02.12.2023. Accused namely Phool Chand, Harry and Arjinder Singh @ Jinder were apprehended and brought to Police Station Chintapurni for interrogation. The above three accused had been arrested by police of PS Chintapurni in case FIR No.63/2023 dated 29.11.2023 registered under Section 153A, 120B IPC, Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement Act) 1985 and Section 13 of Unlawful Activities (Prevention) Act, 1967. The accused were produced by the police of PS Chintpurni, District Una before JMIC-II Amb (Una) where they were remanded to police custody for 10 days. The clothes of accused, spray paint bottles and mobiles were taken into possession by the police of PS Chintpurni, District Una. Subsequently, the police custody of the three accused persons was transferred to Dehra and they were arrested on 18.12.2023 in the present FIR. The disclosure statement of accused was recorded under Section 27 of the Indian Evidence Act. Accused Harry identified the spot where he had written the Khalistani Slogan with other co-accused on 28.11.2023. A memo of identification of spot and map was accordingly prepared.

vi. Copy of the relevant data of CDR is **Exhibit PW-45/P28**; copy of arrest information memo in vernacular along with English translation thereof is **Exhibit PW-45/P29 (colly)**; copy of disclosure statement of accused Phool Chand under Section 27 of Indian Evidence Act in vernacular is **Exhibit PW-45/P30** and English translation thereof is **Exhibit PW-45/P31**; copy of the disclosure statement of accused Harry under Section 27 of Indian Evidence Act in vernacular is **Exhibit PW-45/P32** and English translation thereof is **Exhibit PW-45/P33**; copy of memo of identification of spot by Harry in vernacular is **Exhibit PW-45/P34** and English translation thereof is **Exhibit PW-45/P35**; copy of site plan in vernacular along with English translation is **Exhibit PW-45/P36**; copy of statement of Constable Karanjeet Singh in vernacular is **Exhibit PW-45/P37** and English translation thereof is **Exhibit PW-45/P38**.

vii. He also deposed that on 23.12.2023, accused Phool Chand also identified the shop from where the accused had purchased two bottles of spray paint to write Khalistani Slogans. Accordingly, a map of identification of paint shop was prepared and CCTV footage of the shop in which the accused are seen was taken into possession vide seizure memo.

viii. Copy of identification spot map in vernacular along with English translation thereof is **Exhibit PW-45/P39**; copy of Seizure Memo dated 23.12.2023 containing CCTV footage in the pen drive in vernacular is **Exhibit PW-45/P40** and English translation is **Exhibit PW-45/P41**; copy of the statement of Maninder Singh in vernacular along with English translation thereof is **Exhibit PW-45/P42.**; copy of statement of Munish

Verma in vernacular along with English translation thereof is **Exhibit PW-45/P43**.

ix. PW-45 further testified that during investigation, it was found that Gurpatwant Singh Punnun, the General Counsel of SFJ had taken responsibility for writing pro-Khalistani slogans in Chintpurni Bazaar on 28.11.2023, through a viral video on social media. The said video was submitted as evidence in a pen drive by journalist Aman Sharma, which was taken into possession vide seizure memo dated 23.12.2023. Further, Section 13 of the Unlawful Activities (Prevention) Act, 1967 was invoked in the present FIR vide case diary No.17 dated 23.12.2023. It was also revealed during investigation that a friend of accused Arjinder Singh alias Jinder, had sent Rs.25,000/- on 26.11.2023, i.e., 2 days before the incident, through Western Union Money Transfer to Phool Chand. Accordingly, notice under Section 91 Cr.P.C. was sent to the Nodal Officer of Western Union on 20.12.2023.

Copy of Seizure Memo dated 23.12.2023 of pen drive containing viral video in vernacular is **Exhibit PW-45/P44** and English translation thereof is **Exhibit PW-45/P45**; copy of the statement of witness Vikas Sharma in vernacular along with English translation thereof is **Exhibit PW-45/P46**; copy of the statement of witness Aman Sharma in vernacular along with English translation thereof is **Exhibit PW-45/P47**; copy of Case Diary No.17 dated 23.12.2023 in vernacular is **Exhibit PW-45/P48** and English translation thereof is **Exhibit PW-45/P49**; copy of the transcript of the video along with pen drive containing a copy of the aforesaid viral video is **Exhibit PW-45/P50**; copy of notice under Section 91 Cr.P.C. in connection with transaction of money to Nodal Officer, Western Union along with their reply and Western Union Transfer Receipt is collectively **Exhibit PW-45/P51**.

x. The witness stated that the case is pending investigation. Since, there is a connected case registered at PS: Chintpurni of same date, involving the same accused, the case property and other documents of PS: Chintpurni, required for the present case were under transfer to PS: Dehra for the purpose of present FIR.

xi. He further stated on oath that Gurpatwant Singh Pannun and organization SFJ have already been banned in 2019. The registration of present FIR shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cessation and secessionist activities. He expressed the view that if the ban on the SFJ is not extended or the activities are not curbed and controlled immediately, SFJ will resurrect and revive militancy and terrorism in the State of Punjab.

68. PW-46

i. **PW-46 Narayan Singh**, Station House Officer (SHO), PS Dharamshala, District Kangra, Himachal Pradesh, tendered his affidavit **Exhibit PW-46/A** after due authorization by the Competent Authority. He deposed that he is the Investigating Officer (inadvertently referred to as Supervisory Officer in the affidavit) of FIR No.77/2022 under Section 153A, 153B IPC, and Section 3 of the Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 registered at PS Dharamshala. He further deposed that he is the Supervisory Officer of FIR No.230/2023 under Section 3 of the Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985, and Section 3 of the Prevention of Damage to Public Property Act, 1984 registered at PS Dharamshala. These cases are mentioned at Serial No.73 and 75 respectively of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation

as well as on his personal knowledge acquired as the Investigating/ Supervisory Officer of the FIRs mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 77/2022, Police Station-Dharamshala, District Kangra, Himachal Pradesh

ii. PW-46 testified that FIR No.77/2022 dated 08.05.2022 under Section 153A, 153B IPC 1860, Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 was registered at Police Station: Dharamshala, District Kangra, Himachal Pradesh. Later on, Section 3 of Prevention of Damage to Public Property Act, 1984 was invoked vide supplementary challan dated 01.09.2019. Section 13 Unlawful Activities (Prevention) Act, 1967 was added vide case diary No.01 dated 08.05.2022. The said FIR was registered on the statement of Shri Ram Chand @ Ajay Kumar, who informed that on 08.05.2022 while he was going towards Siddhwadi from Vidhan Sabha Bhawan Tapovan for morning walk, he saw yellow banners hanging, on which KHALISTAN was written in black color in English. Also, 'KHALISTAN' was written in Punjabi in green color on the wall of the gate. The act was stated to have been done by some unknown persons on the previous night with the intention to create wrong impact on the religion. FIR was accordingly registered.

iii. Copy of the FIR annexed with affidavit in vernacular is **Exhibit PW-46/P1** and English translation thereof is **Exhibit PW-46/P2**; copy of statement of informant/Ram Chand @ Ajay Kumar in vernacular is **Exhibit PW-46/P3** and English translation thereof is **Exhibit PW-46/P4**.

iv. He deposed that during investigation, the spot was inspected and site plan was prepared. Photographs were also clicked and statement of witnesses was recorded. Khalistan banners put up along the main gate and wall of the Vidhan Sabha Tapovan building along with green and white colour paint used for writing were seized vide Seizure Memo dated 08.05.2022. It was also found that a video had gone viral on social media and News Channel, in which Gurpatwant Singh Pannun had taken responsibility for affixation of Khalistani flags at the said spot by members of SFJ. In the said video, a person also talks about the merger of Himachal Pradesh with the State of Punjab through Referendum on 6th June 2023 and declaring the State of Himachal Pradesh as Khalistan State. The said video was taken into possession as evidence and consequently, Section 13 of Unlawful Activities (Prevention) Act, 1967 was invoked vide Case Diary No. 01 dated 08.05.2022.

v. Copy of site plan in vernacular along with English translation thereof is collectively **Exhibit PW-46/P5**; copy of photographs of the site of incident is **Exhibit PW-46/P6 (colly)**.; copy of Seizure Memo of yellow colour flags along with green colour paint dated 08.05.2022 in vernacular is **Exhibit PW-46/P7** and English translation thereof is **Exhibit PW-46/P8**; copy of statement of Raman Sharma and Rajender Kumar in vernacular is **Exhibit PW-46/P9**. English translation thereof is **Exhibit PW-46/P10**; copy of the transcript of the video along with pen drive containing the video which is tendered in evidence today is **Exhibit PW-46/P11**; copy of Certificate under Section 65-B, Indian Evidence Act, 1872 in vernacular is **Exhibit PW-46/P12** and its English translation thereof is **Exhibit PW-46/P13**; copy of Case Diary No.01 dated 08.05.2022 in vernacular is **Exhibit PW-46/P14** and English translation thereof is **Exhibit PW-46/P15**.

vi. He further deposed that during investigation, one Vijay Kumar Walia was found connected to the

present case and on interrogation disclosed that on 07.05.2022, two persons from Punjab came on Scooty Number PB87-5411 to stay at his Home Stay. Thereafter, he provided two mobile numbers - 7527966742 and 9592322583 of the accused. The CDRs of the mobile number of accused was reviewed, which revealed that they were residents of Morinda Roopnagar (Punjab) and were present at Himachal Pradesh on the relevant day i.e. 07.05.2022. Accordingly, the police searched the area of Morinda Roopnagar, Punjab. The Scooty with number PB87-5411 which was used in the commission of offence was traced and found parked outside the residence of accused Harveer Singh (mobile no. 9592322583). On opening the dickey of the Scooty, a key, one saffron color cloth, 3 surgical gloves and original RC of the Scooty were recovered vide and taken into possession vide Seizure Memo dated 11.05.2023. During further interrogation, accused Harvir Singh also disclosed that another person Paramjeet Singh @ Pamma was with him on the day of incident i.e. 07.05.2022 at Vidhan Sabha Tapovan Dharamshala. Thereafter, accused Harvir Singh was arrested on 11.05.2022 and his mobile phone was seized vide Seizure Memo dated 13.05.2022. Co-accused Paramjeet @ Pamma was arrested on 14.05.2022.

Copy of the relevant CDR data is **Exhibit PW-46/P 16**; copy of Seizure Memo of Scooty No.PB87-5411 along with other articles dated 11.05.2023 in vernacular is **Exhibit PW-46/P17** and English translation thereof is **Exhibit-PW-46/P18**; copy of arrest memos of both accused in vernacular is **Exhibit PW-46/P19** and English translation thereof is **Exhibit PW-46/P20**; copy of Seizure memo of mobile phone of accused Harvir Singh dated 13.05.2022 in vernacular is **Exhibit PW-46/P21** and English translation thereof is **Exhibit PW-46/P22**.

vii. PW-46 further testified that disclosure statement of accused Harvir Singh was recorded under Section 27 of the Indian Evidence Act, 1872 whereupon he disclosed about the place from where the paint was purchased along with other particulars. Based on the disclosure statement of accused Harvir, a spray paint bottle was recovered from the spot at Vidhan Sabha Tapvan Dharashala vide Seizure and Recovery Memo dated 14.05.2022. A shop named 'Dulux Hardware' at Yol Bazar was also identified by accused Harvir Singh and a memo of identification of the shop was prepared on 14.05.2022. Accused Harvir and Paramjeet Singh also identified a place at Tarkhan Khas Punjab near Sarhind Canal bushes, from where they had brought 5 yellow Khalistan flags and a memo of identification of the said spot was prepared on 17.05.2022.

viii. Copy of the disclosure statement of accused Harvir in vernacular is **Exhibit PW-46/P23** and English translation thereof is **Exhibit PW-46/P24**; copy of Seizure and Recovery Memo dated 14.05.2022 in vernacular is **Exhibit PW-46/P25** and English translation thereof is **Exhibit PW-46/P26**.; copy of identification memo of Shop 'Dulux Hardware' at Yol Bazar in vernacular is **Exhibit PW-46/P27** and English translation thereof is **Exhibit PW-46/P28**; copy of identification memo of spot at Tarkhan Khas Punjab near Sarhind Canal in vernacular is **Exhibit PW-46/P29** and English translation thereof is **Exhibit PW-46/P30**.

ix. He further testified that during investigation, the mobile phones of the accused were sent to RFSL Dharamshala, District Kangra, Himachal Pradesh for Data Retrieval/Analysis. As per RFSL Dharamshala Report dated 25.05.2022, the video which went viral on 08.05.2022 was made on the mobile number of accused Harvir Singh. Further, the spray paint sample and bottle recovered were sent to RFSL Mandi for

analysis. As per report dated 25.05.2022, the green color paint recovered is consistent with the green color paint found on the wall. Copy of the RFSL Report, Dharmshala dated 25.05.2022 is **Exhibit PW-46/P31**; copy of the RFSL Report, Mandi is **Exhibit PW-46/P32**.

x. The witness deposed that based on the investigation and evidence, Final Report/Chargesheet dated 08.07.2022 was filed against accused Harvir Singh and Paramjeet Singh @ Pumma. Copy of Final Report/Chargesheet dated 08.07.2022 in vernacular is **Exhibit PW-46/P33** and English translation thereof is **Exhibit PW-46/P34**; copy of supplementary challan dated 31.08.2022 in vernacular is **Exhibit PW-46/P35** and English translation thereof is **Exhibit PW-46/P36**.

xi. He further stated on oath that during investigation, it was also found that accused Harvir Singh was an active member of a WhatsApp group namely 'US MEDIA 13 INTERNATIONAL' which appears to be created for the promotion of Khalistan. Accordingly, he received messages with instructions to hoist the Khalistan flags at Vidhan Sabha Tapovan Dharmshala due to which accused Harvir Singh and co-accused Paramjeet Singh hoisted the Khalistan flags on the spot. Further, accused prepared a video of the whole incident and sent it to mobile number +13472880173. Thereafter, the same went viral on social media and Newspapers. To establish the link of accused Harvir Singh's mobile number with 2 suspected international numbers, i.e., +13472880173 and +19174766317, necessary correspondence has been made through MLAT for procuring relevant evidence from the service provider of WhatsApp in USA. However, the response therein is still awaited. Copy of MLAT dated 07.03.2023 is **Exhibit PW-46/P37**.

FIR No. 230/2023, Police Station Dharamshala, District Kangra, Himachal Pradesh

xii. PW-46 deposed that FIR No.230/2023 dated 04.10.2024 under Section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement) Act, 1985 and Section 3 of Prevention of Damage to Public Property Act, 1984 was registered at Police Station Dharamshala, District Kangra, Himachal Pradesh, on the statement of Ashwani Kumar. He informed that on 03.10.2023, he along with Prakash Chand was on duty near the office of Executive Engineer, Jal Shakti Department, wherein a boy standing near the road sat down near the wall with a signboard and started writing something. Not suspecting the commission of any illegal activity, the complainant and Prakash Chand went to their respective offices. Later, when the informant came out of his office, he saw '*KHALISTAN ZANDABAD*' written in English on the wall. Accordingly, the said FIR was registered under section 3 of Himachal Pradesh Open Places (Prevention of Disfigurement Act, 1985 and section 3 Prevention of Damage to Public Property Act, 1984.

xiii. A Copy of the FIR in vernacular is **Exhibit PW-46/P38** and English translation thereof is **Exhibit PW-46/P39**; copy of the statement of informant/Ashwani Kumar in vernacular is **Exhibit PW-46/P40** and English translation thereof is **Exhibit PW-46/P41**.

xiv. He further deposed that during investigation, CCTV footage of the spot was checked and it was revealed that a person is coming towards the spot of occurrence, but the suspect could not be identified. An Untrace Report dated 25.01.2024 was filed before CJM, Kangra which was accepted vide order dated 05.10.2024. Copy of the Untrace Report in vernacular is **Exhibit PW-46/P42** and English translation thereof is **Exhibit PW-46/P43**; copy of order dated 05.10.2024 passed by CJM, Kangra is **Exhibit PW-46/P44**.

xv. The witness has stated on oath that the FIRs reflect that Gurpatwant Singh Pannun and his organization SFJ are indulging in secessionist activities after it was already banned in 2019. He expressed the view that if the ban to the SFJ is not extended or the activities are not curbed, it will resurrect and revive militancy and terrorism in the State of Punjab.

69. PW-47

i. **PW-47 Ram Swroop Thakur**, Station House Officer (SHO), PS Shimla West (also referred to as PS Boileauganj), District Shimla, Himachal Pradesh, tendered his affidavit **Exhibit PW-47/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.221/2022 under Sections 153A and 153B IPC registered at PS Shimla West, Himachal Pradesh, mentioned at Serial No.74 of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired as the Supervisory Officer of the FIR mentioned above. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 221/2022, Police Station-Shimla West (Boileauganj), District Shimla, Himachal Pradesh

ii. PW-47 deposed that FIR No. 221/2022 dated 08.09.2022 u/s 153A and 153B of IPC was registered at Police Station: Shimla West (Boileauganj), District Shimla, Himachal Pradesh. Section 120B was subsequently invoked. The aforesaid FIR was registered on the statement of Rakesh Kumar Sharma, a Security Guard at Jal Shakti Bhawan Tutikandi, District Shimla, Himachal Pradesh. Complainant stated that he was a night watchman at Jal Shakti Bhawan and on 05.09.2022 around 11:30 PM, during duty hours he saw a yellow cloth hanging on the main gate. The cloth was inscribed with “*KHALISTHAN*” and also had a logo. He further stated that he took off the said piece of cloth and kept it over a drain outside the Jal Shakti Bhawan. FIR was accordingly registered.

iii. Copy of the FIR annexed with affidavit in vernacular along with English translation thereof is **Exhibit PW-47/P1**; copy of statement of Rakesh Kumar Sharma in vernacular along with English translation thereof is **Exhibit PW-47/P2**; copy of statements of Prem Chand and Hemraj recorded under Section 161 Cr.P.C. in vernacular are **Exhibit PW-47/P3** and English translation thereof are **Exhibit PW-47/P4**.

iv. He further deposed that on receiving the complaint, the site was inspected. A site plan (spot map) was prepared and photographs of the site were taken. The yellow-coloured piece of cloth on which KHALISTAN was written was taken into possession vide separate seizure memo dated 10.09.2022.

v. Copy of site map/spot map in vernacular along with English translation thereof and the photographs of the spot are collectively **Exhibit PW-47/P5**; copy of seizure memo dated 10.09.2022 in vernacular along with English translation thereof is **Exhibit PW-47/P6**.

vi. He testified that during investigation, it was found that one Raman alias Sonu and Sam, who were arrested by Punjab Police in FIR No.102/2022 dated 08.08.2022 registered at Police Station: Navi Bradari, Jalandhar, disclosed that on 05.09.2022, the accused had travelled to Shimla and hoisted the flag of Khalistan on the main gate of Jal Shakti Bhawan, Tutikandi. Since both the accused were in judicial custody in Central Jail Kapurthala in Punjab, production warrants were obtained from the Competent Court. The accused were

formally arrested on 12.01.2023. Accused Raman alias Sonu made a disclosure statement regarding hoisting of flag and making of video with his mobile phone which he had sent to a person named Vikramjit in America, with whom he used to talk on WhatsApp call. The spot identification memo dated 13.01.2023 was prepared at his instance. Copy of production warrants of both accused are collectively **Exhibit PW-47/P7**; copy of information of arrest u/s 50 Cr.P.C. in respect of both the accused in vernacular is **Exhibit PW-47/P8** and English translation thereof is **Exhibit PW-47/P9**; copy of disclosure statement of accused Raman alias Sonu in vernacular along with English translation thereof is collectively **Exhibit PW-47/P10**; copy of memo of identification of spot dated 13.01.2023 (inadvertently mentioned as seizure memo of the spot) in vernacular along with English translation thereof is collectively **Exhibit PW-47/P11**.

vii. He further deposed that chargesheet was filed against accused Raman alias Sonu and Sam for offences punishable under Section 153A, 153B and 120B IPC. Both the accused are on bail vide order dated 07.03.2023 and 14.03.2023 passed by Additional CJM. Copy of the chargesheet in vernacular is **Exhibit PW-47/P12** and English translation thereof is **Exhibit PW-47/P13**; copy of orders dated 07.03.2023 and 14.03.2023 are collectively **Exhibit PW-47/P14**. The case is stated to be pending trial before CJM, Shimla and the last date of hearing was 26.04.2024. Copy of the last order dated 26.04.2024 is **Exhibit PW-47/P15**.

viii. He testified that Raman @ Sonu is accused in three other cases mentioned at Serial No. 37, 41 and 42 of the Background Note, and accused Sam is accused in two other cases mentioned at Serial No.37 and 42 of the Background Note.

ix. PW-47 further stated on oath that the aforesaid FIR has been registered against Gurpatwant Singh Pannun and his organization SFJ after the same was banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cessation and secessionist activities. He was of the view that if the ban to the SFJ is not extended or activities are not curbed, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

70. PW-48

i. **PW-48 Pramod Kumar Mishra**, Deputy Superintendent of Police, Hatia, Ranchi, Jharkhand, tendered his affidavit **Exhibit PW-48/A** after due authorization by the Competent Authority. He deposed that he is the Investigating Officer of FIR No.69/2024 dated 19.02.2024 under Sections 10 and 13 of the Unlawful Activities (Prevention) Act, 1967, and Section 66(F) of the Information Technology (Amendment) Act, 2008, registered at PS Dhurva, Ranchi, and tendered the said FIR by way of additional affidavit **Exhibit PW-48/B**. This FIR is mentioned at Serial No.96 of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as his personal knowledge acquired over 31 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No. 69/2024, PS-Dhurva, Ranchi, Jharkhand

ii. PW-48 testified that FIR No.69/2024 dated 19.02.2024 was registered at P.S. Dhurva, Ranchi on the statement of Sub-Inspector of Police Madan Kumar Mahto. He stated that a test match between India and England was scheduled at JSCA Stadium, Ranchi from 23.02.2024 to 27.02.2024 and Gurpatwant Singh Pannun through a video uploaded on YouTube called upon the banned organization CPI (MAOISTS) in India

to create disturbance in Jharkhand and Punjab in order to cancel the match between India and England. Gurpatwant Singh Pannun further threatened Indian Captain of Indian Cricket Team Rohit Sharma and Captain of England Cricket Team Ben Stokes. The said act was stated to have been done to create fear among the locals and cause losses to the Government of India and BCCI. Also, an attempt was made to tarnish the image of India at International level.

iii. Copy of the FIR annexed with affidavit is **Exhibit PW-48/A1**, and the English translation thereof is **Exhibit PW-48/A2**. Copy of statement of SI Madan Kumar Mahto in vernacular is **Exhibit PW-48/P-3** and English translation thereof is **Exhibit PW-48/P-3/1**. The copy of FIR has been tendered by way of separate affidavit today, as referred to above.

iv. He deposed that subsequently, Officer-in-Charge of Police Station: Dhurwa filed an application before Chief Judicial Magistrate, Sadar Court, Ranchi seeking permission to also invoke offences u/s 16, 17, 18, 18B and 20 of Unlawful Activities (Prevention) Act, 1967 apart from Section 10 and 13 of UAPA. Copy of aforesaid application in vernacular is **Exhibit PW-48/P-4** and English translation thereof is **Exhibit PW-48/P-4/1**.

v. He further testified that during investigation, statement of witnesses Shashi Bhusan Singh and Manish Kumar was recorded under Section 161 Cr.P.C. They stated that they had seen the video on YouTube wherein the call had been made by Gurpatwant Singh Pannun with the aim to cancel the cricket match fixed between England and India from 23.02.2024 to 27.02.2024, which further instilled fear among the people in the area. Copy of statement of Shashi Bhusan Singh recorded under Section 161 Cr.P.C. in vernacular is **Exhibit PW-48/P-5** and English translation thereof is **Exhibit PW-48/P-5/1**; copy of statement of Manish Kumar recorded under Section 161 Cr.P.C. in vernacular is **Exhibit PW-48/P-6** and English translation thereof is **Exhibit PW-48/P-6/1**. The case is stated to be under investigation.

vi. PW-48 further deposed that apart from the present FIR, Special Branch, Ranchi vide memo no. 455/CTIC dated 08.10.2024 provided certain data inputs with reference to “Daljeet Singh Sandhu” who is a sympathizer for Sikhs for Justice (SFJ). Copy of the memo No.455/CTIC dated 08.10.2024 is **Exhibit PW-48/P-7** and English translation thereof is **Exhibit PW-48/P-7/1**; copy of input information is **Exhibit PW-48/P-8**.

vii. PW-48 testified that earlier, on receiving the secret information, Deputy Superintendent of Police, Special Branch, Jamshedpur, vide letter no.1637 dated 02.10.2021 on conducting verification found that two cases had been registered against “Daljeet Singh Sandhu” i.e. Case No.113/12 dated 07.04.2012 u/s 379 and 411 of IPC at P.S. Telco & Case No.32/13 dated 24.01.2013 u/s 323, 341, 504, 506, 34 IPC at P.S. Golmuri. During verification, it was found that “Daljeet Singh Sandhu” was in contact with Gurpatwant Singh Pannun and his conduct was also suspicious. Further, Deputy Superintendent of Police, Special Branch, Jamshedpur vide letter no. 1631 dated 17.12.2022 conducted enquiry and found that publication by social media group OpIndia regarding posters depicting Khalistani Terrorist Jarnail Singh Bhindrawale, Beant Singh, Satwant Singh Rajoana, Davinder Pal Singh Bhullar, Dilawar Singh Babber and describing Indian Army as Hindutva Terrorists in the Jharkhand Gurudwara was true and such posters were placed in the Gurudwara Museum as Martyrs.

viii. The copy of communication regarding verification with reference to memorandum dated 22.09.2021 in vernacular is **Exhibit PW-48/P-9** and English translation thereof is **Exhibit PW-48/P-9/1**. The communication dated 17.12.2022 regarding putting up of posters referred to above in vernacular is **Exhibit PW-48/P-10** and English translation thereof is **Exhibit PW-48/P-10/1**. Copy of Communication dated 10.06.2023 addressed by Special Cell in respect of putting up of posters of Khalistani Extremist and Thinker Jarnail Singh Bhindrawale at Golmuri Chowk in vernacular is **Exhibit PW-48/P-11** and English translation thereof is **Exhibit PW-48/P-11/1**.

ix. The witness further deposed that the aforesaid FIR has been registered against Gurpatwant Singh Pannun and SFJ after it has already been banned in 2019. The same reflect that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. He expressed the view that if the ban to the SFJ is not extended or its activities are not curbed, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

71. PW-49

i. **PW-49 Talwinder Singh Gill**, Deputy Superintendent of Police (Detective), SAS Nagar, Punjab, tendered his affidavit **Exhibit PW-49/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.149/2017 dated 06.07.2017 u/s 124A, 153A, 153B, 120B IPC registered at PS: Sohana; FIR No.07/2020 dated 01.02.2020 u/s 384, 387, 506, 294, 385 IPC registered at PS: Phase XI, SAS Nagar, and FIR No.43/2020 dated 19.06.2020 u/s 124A, 131, 153A IPC and Sections 10, 13 of the Unlawful Activities (Prevention) Act, 1967 registered at PS: Sadar Kurali, mentioned at Serial Nos. 02, 13, and 19, respectively of the Background Note. The contents of his affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 8 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No.149/2017 PS-Sohana, District SAS Nagar,Punjab

ii. PW-49 testified that FIR No.149/2017, dated 06.07.2017, under Sections 124A, 153A, 153B, 120B IPC, was registered at PS Sohana, District SAS Nagar, on statement of CIA Incharge, Inspector Atul Soni who received a secret information that objectionable posters had been put up in various places in Punjab. The posters reflected "*Freedom is the solution, 2020 Punjab Independence Referendum*" and "*33 years ago, thousands of innocent Sikhs were massacred during the army attack on Darbar Sahib*". A photo of Bhindranwale and an image of the damage done to Akal Takht Sahib in 1984 was also posted on the objectionable poster. One of said objectionable posters was put up at CGC Landran, District Mohali which created an atmosphere of fear amongst general public. Also, many such posters were put up near religious places. The complainant further reported that the persons behind said posters were Gurpatwant Singh Pannun, Legal Advisor for Sikhs for Justice (A New York based organization), Jagdeep Singh @ Baba Singh from Fatehgarh Sahib (residing in New York) and Jagjit Singh from Jammu (presently residing in New York). Further, the said persons were stated to be using Harpuneet Singh from Nanak Nagar, Jammu (who works at SK Publicity Printing Press, Jammu) and Gurpreet Singh (s/o of Kuldeep Singh r/o House No.869, Sector-

80, Mohali, who runs a Printing Press) by misleading them with temptation to work against the country. The FIR was accordingly registered. Further, during course of investigation, objectionable posters from the walls of CGC College, Landram was removed. Also, a laptop with charger and a computer set was seized on 06.07.2017 from office of Gurpreet Singh.

iii. The copy of the FIR annexed with affidavit is **Exhibit PW-49/P1** and English translation thereof is **Exhibit PW-49/P2**; copy of Seizure memo dated 06.07.2017 in respect of laptop used by accused Gurpreet Singh is **Exhibit PW-49/P3** along English translation thereof. The computer used by accused Gurpreet Singh for preparing the objectionable posters was seized vide seizure memo dated 06.07.2017 and the same is **Exhibit PW-49/P4** along with English translation thereof; The seizure memo of poster affixed in front of CGC College is **Exhibit PW-49/P5** along with English translation thereof.

iv. PW-49 further deposed that during investigation, Harpuneet Singh and Gurpreet Singh were arrested and memos of arrest along with English translation thereof are **Exhibit PW-49/P6**. Copy of statement of witnesses ASI Harbhajan Singh, HC Deepak and HC Raj Kumar recorded under Section 161 Cr.P.C. along with English translation thereof are **Exhibit PW-49/P7 (colly)**. He stated that final report/Chargesheet under Section 173 Cr.P.C. against accused Gurpreet Singh and Harpuneet Singh has been filed, and the relevant English translation is **Exhibit PW-49/P8**. The case is stated to be pending trial. The necessary steps are also being taken against accused Gurpatwant Singh Pannun, Jagdeep Singh and Jagjit Singh, who are based at New York for declaring them as Proclaimed Offenders.

FIR No.07/2020 Police Station-Phase XI, SAS Nagar, Punjab.

v. PW-49 deposed that FIR No.07/2020 dated 01.02.2020 under Sections 384, 387, 506, 294, 385 IPC was registered at Police Station Phase XI, SAS Nagar on the statement of Gurdial Singh who stated that on 17.01.2020 at about 07.13 p.m., he received a call on his mobile number from 7082251487 and demanded an extortion amount of Rs.5 lakhs failing which he would be shot dead. Threat was also extended for killing him along with his family in case the amount was not paid. The Truecaller further depicted the photograph of Bhindranwale. FIR was accordingly registered. The copy of the FIR annexed with the affidavit is **Exhibit PW-49/P9** and its English translation thereof is **Exhibit PW-49/P10**.

vi. He further testified that during course of investigation, four accused were arrested, namely Harshdeep Singh, Bharmjot Singh, Ravi Kumar and Amandeep Singh. The memos of arrest in vernacular along with English translation thereof are collectively **Exhibit PW-49/P11**. Copy of statement of witnesses, namely, Const. Harpreet Singh, HC Nishan Singh, Jasvir Singh recorded under Section 161 Cr.P.C. is collectively **Exhibit PW-49/P12** along with English translation thereof. The copy of the Chargesheet/final report in vernacular along with English translation thereof against the four accused is collectively **Exhibit PW-49/P13**.

The case is stated to be pending trial.

vii. The witness has further deposed that during the course of investigation no direct evidence could be collected implicating SFJ or Gurpatwant Singh Pannun but the same stands reflected in the Background Note filed by the Ministry of Home Affairs as the photograph of Bhindranwale was seen on the posters. The said photograph is also used by SFJ in its campaign to propagate cession/secessionist activities.

FIR No.43/2020, Police Station-Sadar Kurali, District SAS Nagar, Punjab.

viii. PW-49 deposed that FIR No.43/2020, dated 19.06.2020, under Sections 124A, 131, 153A IPC, and Sections 10, 13 of the Unlawful Activities (Prevention) Act, 1967 was registered at Police Station Sadar Kurali, District SAS Nagar, on the statement of Amroz Singh, DSP Subdivision-Kharar-2, who received a source information that automated pre-recorded audio message calls were being made from telephone number +13074592978. The aforesaid calls contained the audio message, wherein the caller claimed that he is Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice and the group seeks secession of Punjab from India. In one such recorded audio message, Pannun was instigating the Sikh Army personnel that they should not give their lives for the country as India has been committing genocide of Sikhs. He also lured them by asking to leave the Indian Armed Forces and that he would pay them equivalent amount of salary and Rs.5000/- etc.

ix. He further deposed that it was also recorded in the FIR that at a time when the whole country was mourning the death of gallant soldiers in Galwan valley, Gurpatwant Singh Pannun was trying to mock at the supreme sacrifice of the Sikh soldiers and was trying to incite them and create disaffection amongst them. Gurpatwant Singh Pannun was further alleged to have circulated a letter on social media in which he has condemned India's action against China at the International border at Ladakh. Pannun also thanked people of China for overwhelming, encouraging and supporting response they had given to SFJ's recent call for non-Governmental Referendum 2020 for the secession of Punjab from India.

x. The witness testified that during the course of investigation, a copy of video clipping on YouTube in circulation was also seized wherein Gurpatwant Singh Pannun is seen inciting in this regard. He stated that it was also revealed during investigation that automated pre-recorded (IVR) audio message calls from telephone number +18647131173, +12156076807 and +16162085475 were received on 17.06.2020, in which a lady who is yet to be identified, claimed that she is from China and is a supporter of Sikhs for Justice (SFJ). Further, she appealed to the people of Punjab to participate in voter registration for Punjab Referendum 2020 which would start from 4th July, 2020. She also instigated the Sikhs, alleging that India has committed genocide of Sikhs and is destroying the Sikh religion. The US based organization 'Sikhs for Justice' was found to be indulging in activities, which have the potential of disrupting peace, unity and integrity of the country and intends to disrupt the sovereignty and territorial integrity of India.

The case is stated be still under investigation.

xi. Copy of the FIR is **Exhibit PW-49/P14**; copy of seizure memo of pen drive containing the video and URL link of pro-Khalistani speech given by Gurpatwant Singh Pannun is **Exhibit PW-49/P15**; copy of said video clipping is being placed on record and is **Exhibit PW-49/P15A**; The transcript of downloaded video is **Exhibit PW-49/P16**; Orders passed by the concerned Court whereby Gurpatwant Singh Pannun has been declared as Proclaimed Offender is **Exhibit PW-49/P17**.

xii. The witness PW-49 has further stated on oath that Gurpatwant Singh Pannun and his organization SFJ continues its activities after it has already been banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ are continuously indulging in cession and secessionist activities. He further expressed the view that if the ban to the SFJ is not extended or its activities are not curbed and controlled

immediately, it will resurrect and revive militancy and terrorism in the State of Punjab in particular and other parts of the country.

72. PW-50

i. **PW-50 Palwinder Singh Cheema**, PPS No.DR/2011, Superintendent of Police, Special Branch-cum-Investigation, Sangrur, Punjab tendered his affidavit Exhibit PW-50/A after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of **FIR No.116 dated 20.06.2022** u/s 153-A, 153-B, 120-B IPC, Section 13, 18 Unlawful Activities (Prevention) Act, 1967 and Section 3 of the Punjab Prevention of Defacement of Property Act, 1997 registered at P.S.: City Sangrur and **FIR No.118 dated 27.06.2022** u/s 153-A/153-B/427/120-B IPC and Section 3 of the Punjab Prevention of Defacement of Property Act, 1997 registered at PS: City Sangrur, mentioned at Serial No.35 and 36 respectively of the Background Note. The contents of the affidavit are stated to be based on record revealed during investigation as well as on his personal knowledge acquired during 13 years of service as a Police Officer since 2011. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR No.116 dated 20.06.2022

ii. He deposed that **FIR No.116 dated 20.06.2022** u/s 153-A, 153-B, 120-B IPC, Section 13, 18 Unlawful Activities (Prevention) Act, 1967 and Section 3 of The Punjab Prevention of Defacement of Property Act, 1997 was registered at P.S.: City Sangrur on 20.06.2022 on information by Inspector Amrik Singh who received a secret information during the course of his duty. Further, the secret information depicted in transcription of the FIR reads as under: *“on the back side gate of Maha Kali Devi Mandir, Patiala Gate, Sangrur, which is towards the Banasar Bagh side and remains usually closed and Punjab Hal Khalistan 26 January” and in English Referendum 26 and in English Refrendum 26 January, 2023* is got written by spray with black spray paint by Gurpatwant Singh Pannu, who is running an illegal organization SFJ for anti-national activities from abroad and this organisation is declared illegal by the government of India. Through conspiracy he got it written with the help of naughty unidentified Persons and in English *“REFRENDUM 26 January 2023”* has been written. Now in this regard, a video has been viralled on the Social media, at which I Inspector checked the viral video on my mobile phone and saw the viral video in which video Gurpatwant Singh Pannu has claimed oral responsibility for getting written *“Punjab Hal Khalistan SFJ 26 January”* and *“REFRENDUM 26 January 2023”* in English on Mahakali Devi Mandir Patiala Gate, Sangrur on the back gate and wall with black spray paint by his unidentified naughty persons and he is making inflammatory statements against the country. By making provocative statements in the viral video at the social media and by getting written *Punjab Hal Khalistan SFJ 26 January* and in English *REFRENDUM 26 January 2023* with black spray paint on the back gate and wall of Mahakali Devi Temple Patiala Gate Sangrue, through unidentified bad elements, the religious sentiments of the people have been hurt. His intention is to create an atmosphere of fear and intimidation by creating bitterness among the people of different religions and sects.”

The case is stated to be still under investigation.

The copy of the FIR annexed with affidavit in vernacular is **Exhibit PW-50/P1** and English translation thereof is **Exhibit PW-50/P2**; copy of statement of witnesses namely C. Kuldeep Singh and Inspector Amrik Singh in vernacular is **Exhibit PW-50/P3** and English translation thereof is **Exhibit PW-50/P4**.

FIR No.118 dated 27.06.2022

iii. PW-50 deposed that FIR No.118 dated 27.06.2022 u/s 153-A/153-B/427/120-B IPC and Section 3 of the Punjab Prevention of Defacement of Property Act, 1997 was registered at PS: City Sangrur on 27.06.2022 on statement of Inspector Amrik Singh, 22/RRT SHO, P.S. City Sangrur. As per FIR, on 27.06.2022 during course of duty, Inspector Amrik Singh received a secret information that Gurpatwant Singh Pannun by hatching a conspiracy with mischievous persons had written slogans near Gate No.2 of Banasar Bagh on the shutter of two closed shops. Further, on the shutter of one shop it was written “Khalistan Jindabad” and on the other shutter “SFJ” was written. Also, on parked cars, “SFJ” and “Khalistan” was written. At Namdev Chowk, “Khalistan Jindabad” was also written on the gate supported by pillars. “SFJ” was also reported to be written on the outer gate pillars of Water Supply and Sanitation Department, Punjab. On the gate of Ranbir Club, “Khalistan Jindabad” was noticed. Further, on the iron board of the District Rehabilitation of Handicapped Persons Centre, “SFJ” was written. FIR was accordingly registered.

He further deposed that Gurpatwant Singh Pannun took the responsibility of writing the said slogans through a video which was uploaded on social media. The

The copy of the FIR **annexed with affidavit** is **Exhibit PW-50/P5** and English translation thereof is **Exhibit PW-50/P6**; copy of statement of witnesses recorded during investigation under Section 161 Cr.P.C. in vernacular is **Exhibit PW-50/P7** and English translation thereof is **Exhibit PW-50/P8**.

He further testified that during the course of investigation, accused Resham Singh, Kulwinder Singh @ Binder and Manpreet Singh were identified as accused on secret information. The memo of identification of accused prepared on 30.06.2022 during investigation is **Exhibit PW-50/P9** in vernacular and English translation thereof is **Exhibit PW-50/P10**.

He further testified that accused Resham Singh, Kulwinder Singh @ Binder and Manpreet Singh were arrested on 30.06.2022 and memo of arrest is **Exhibit PW-50/P11** and English translation thereof is **Exhibit PW-50/P12**.

iv. Further, during investigation, two spray paint cans were stated to be recovered at instance of accused Resham Singh and one spray paint was recovered at instance of accused Kulwinder Singh @ Binder. Two motorcycles, 05 mobile phones with SIM and cloths worn by the accused at the time of committing the crime were also stated to be recovered.

True copy of recovery memos in vernacular is collectively **Exhibit PW-50/P13** and English translation thereof is **Exhibit PW-50/P 14**.

v. He further testified that true copies of memos of presentation of photographs taken from the scene of crime, pen drive in which the accused were seen writing “Khalistan Jindabad” and “SFJ” on closed shutters of shops and cars as well as on outer gate of Covid Centre and main gate of Water Supply and Sanitation

Department along with production memo of pen drive containing audio/video of Gurpatwant Singh Pannun are collectively **Exhibit PW-50/P15**. English translation thereof is **Exhibit PW-50/P16**. The copy of the video clipping contained in pen drive was identified as **Exhibit PW-50/P16A**.

vi. He further stated that on completion of investigation, chargesheet has been filed against three accused under relevant sections and the charge was framed by the learned Trial Court vide order dated 06.05.2023. The copy of the chargesheet in vernacular is **Exhibit PW-50/P17** and English translation thereof is **Exhibit PW-50/P18**. Certified copy of order on charge dated 06.05.2023 is **Exhibit PW-50/P19**.

vii. PW-50 further deposed that bail applications of the three accused, namely, Manpreet Singh, Kulwinder Singh @ Binder and Resham Singh were dismissed by the Competent Courts vide orders dated 27.10.2020, 18.07.2023, 27.07.2023 and 16.12.2022 respectively and the copy of the same is collectively **Exhibit PW-50/P20**. Subsequently, bail applications of the accused Manpreet Singh, Kulwinder Singh @ Binder and Resham Singh were allowed vide orders dated 14.03.2023, 01.05.2024 and 07.05.2024 respectively and the copy of the same is collectively **Exhibit PW-50/P21**.

The matter is further stated to be under trial before the Court of Ld. Additional Sessions Judge, Sangrur and the last date of hearing was 29.10.2024 for prosecution evidence.

viii. He further deposed that at present, LoC against accused Gurpatwant Singh @ Pannu has been issued by the Bureau of Immigration (Ministry of Home Affairs) Government of India on 14.03.2023. Also, land of accused Gurpatwant Singh @ Pannu situated in Amritsar has been attached by NIA.

Copy of the LoC issued against Gurpatwant Singh Pannun is **Exhibit PW-50/P22**.

ix. He further stated that the aforesaid FIRs have been registered against Gurpatwant Singh Pannun and his organization SFJ after it was banned in 2019. This shows that Gurpatwant Singh Pannun and other leaders of SFJ even after ban are continuously indulging in cession and secessionist activities clandestinely. The witness further deposed that he held the view that if the ban on SFJ is not extended, it will resurrect and revive militancy and terrorism in the State of Punjab.

73. PW-51

i. **PW-51 Varun Singla**, Superintendent of Police, Kurukshetra, Haryana, tendered his affidavit **Exhibit PW-51/A** after due authorization by the Competent Authority. He deposed that he is the Supervisory Officer of FIR No.597 of 2020 dated 12.07.2020 under Section 124-A, 153-A IPC and Section 10(a)/13 of the Unlawful Activities (Prevention) Act, 1967, registered at PS: Thanesar City, District Kurukshetra, FIR No.229 of 2022 dated 29.04.2022 under Section 124-A, 153-B, 120-B IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at PS: Thanesar City, District Kurukshetra, and FIR No.81 of 2023 dated 05.04.2023 under Section 153-B, 120-B IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967, registered at PS: Ismailabad, mentioned at Serial No. 57, 60, and 65 respectively of the Background Note. The contents of the affidavits are stated to be based on record revealed during investigation as well as his personal knowledge acquired over 07 years of service as a Police Officer. The documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

FIR bearing No.597/2020, Police Station- Thanesar City, Kurukshetra, Haryana

ii. PW-51 testified that FIR bearing No.597/2020 dated 12.07.2020 under Sections 153-A, 124-A IPC & Sections 10(a) and 13 of Unlawful Activities (Prevention) Act, 1967 was registered at P.S. Thanesar City, Kurukshetra at instance of SI Kuldeep Singh, who stated that a secret information had been received that a call is coming from different numbers from USA in which a pre-recorded message is played that Haryana is a part of independent Punjab that cedes from India following a so called referendum. Further, Gurpatwant Singh Pannun in pre-recorded message blames the government of Haryana and people of Haryana for being inimical to the interest of Sikhs and Punjabis. Gurpatwant Singh Pannun claims that Haryana will be part of Punjab when it becomes an independent country and the people of Haryana will then have the option of either siding with Punjab as an independent country or of leaving the State and moving to other parts of India. He further incites the Sikhs in Haryana and exhorts them to participate in a so called referendum for secession following voter registration on 11th July 2020 at Gurudwara 6th Patshahi, Kurukshetra. FIR was accordingly registered. The copy of the FIR annexed with affidavit in vernacular is **Exhibit PW-51/A1** and English translation thereof is **Exhibit PW-51/A2**.

iii. He deposed that during investigation, the Manager and other workers of Gurudwara 6th Patsahi Kurukshetra were interrogated but no clue could be found. Investigation into the pre-recorded message also did not reveal its origin or any other information. Accordingly, Untrace Report dated 01.11.2020 was prepared with the observation that if in future, any clue is found and placed before the Police, investigation in the case would be conducted as per law. Copy of the Untrace Report in vernacular is **Exhibit PW-51/A3** and English translation thereof is **Exhibit PW-51/A4**.

FIR No.229/2022, Police Station-Thanesar City, Kurukshetra, Haryana

iv. PW-51 further deposed that FIR bearing No.229 of 2022 dated 29.04.2022 under Sections 153B, 124-A, 120-B IPC and Section 13 of the Unlawful Activities (Prevention) Act, 1967 was registered at P.S. Thanesar City, Kurukshetra at instance of Constable Sarwan Kumar who informed that on 28.04.2022 an information was received from Prabandhak PS: Sahar Thanesar that on 28/29.04.2022, Sikhs for Justice could hoist flag on buildings of District Secretariat or place banners. Thereafter, at about 07:00 AM, while he was proceeding for Police Lines, he saw that outside the residence of DSP, a white sheet was hung on which “*KHALISTAN*” was written in Punjabi. The said banner on white sheet was removed to ensure that religious feelings were not exploited. A copy of the FIR in vernacular is **Exhibit PW-51/A5** and English translation thereof is **Exhibit PW-51/A6**.

v. He further testified that during investigation, it was revealed that a similar case was registered in Dharamshala, Kangra, Himachal Pradesh vide FIR No.77 of 2022 under Section 153A, 153B IPC, Section 3 of HP Open Places Prevention and Disfigurement Act, 1985 and Section 13 Unlawful Activities (Prevention) Act, 1967. Investigation in the said case revealed that accused Paramjit Singh and Harveer Singh therein had made a disclosure statement that they had pasted a Khalistani banner in Kurukshetra and were lodged in Kangra Jail, Himachal Pradesh. Production warrants were accordingly issued. Accused Paramjit Singh and Harveer Singh made a disclosure statement dated 30.05.2022.

Copy of disclosure statement dated 30.05.2022 of accused Paramjit Singh in vernacular is **Exhibit PW-51/A7** and English translation thereof is **Exhibit PW-51/A8**; copy of disclosure statement dated 30.05.2022 of accused Harveer Singh in vernacular is **Exhibit PW-51/A9** and English translation thereof is **Exhibit PW-51/A10**. The accused further identified the place of incident wherein the banner was put up at instructions of Gurpatwant Singh Pannun. Fard Nishandehi/Identification Memo in vernacular is **Exhibit PW-51/A11** and English translation thereof is **Exhibit PW-51/A12**. The accused also identified the recovered sheet on which “KHALISTAN” was written as deposited in Malkhana. Memo of Identification of white sheet in vernacular is **Exhibit PW-51/A13** and English translation thereof is **Exhibit PW-51/A14**. The accused Harveer Singh also took the Police party to Krishna Talls Agency (Shop) and identified the same from wherein the bed sheet and spray paint were purchased. The Memo of Identification of Shop/Fard Nishandehi in vernacular is **Exhibit PW-51/A15** and English translation thereof is **Exhibit PW-51/A16**.

vi. PW-51 further deposed that chargesheet was filed after investigation on 25.07.2024. The investigation in respect of Gurpatwant Singh Pannun is still pending. Copy of chargesheet dated 25.07.2024 in vernacular is **Exhibit PW-51/A17** and English translation thereof is **Exhibit PW-51/A18**.

The matter is further stated to be pending trial before the concerned Court at Kurukshetra and was lastly listed on 04.12.2024.

FIR No. 81/2023, Police Station-Ismailabad, Kurukshetra

vii. PW-51 deposed that FIR No.81 of 2023 dated 05.04.2023 under Section 153-B, 120-B IPC and Section 13 Unlawful Activities (Prevention) Act, 1967 was registered at P.S. Ismailabad, Kurukshetra at instance of EASI Lakha Singh. He stated that G-20 Summit was held in the month of February in Delhi and Gurugram, holding of which was protested on social media by Gurpatwant Singh Pannun, Chief of Sikhs for Justice who uploaded videos and exhorted for placing of banners, flags etc. On 05.04.2023, when he reached on his private vehicle near Gagheri Bus Stand, he saw that on the wall of flyover, NH 152-D, someone had written in English “KHALISTAN WELCOME G-20 IN DELHI”. He took the photograph of the same and also informed the senior officer. In respect of the same, a video is stated to have also been issued by Gurpatwant Singh Pannun wherein he spoke about KHALISTAN WELCOME G-20 IN DELHI. FIR was accordingly registered.

viii. The copy of FIR annexed with affidavit in vernacular is **Exhibit PW-51/A19** and English translation thereof is **Exhibit PW-51/A20**. The copy of Seizure Memo dated 05.04.2023 whereby the photograph of the spot was taken, in vernacular is **Exhibit PW-51/A21** and English translation thereof is **Exhibit PW-51/A22**.

ix. He further deposed that the copy of the video clipping stated to be circulated on social media is not a part of the case diary and, as such, the same has not been filed on record with the affidavit. Further, during course of investigation, one Malak Singh was found to be involved in writing similar type of slogans in Delhi. An FIR No.705 of 2023 was registered at Kashmiri Gate, New Delhi, which is mentioned at Serial No.89 of the Reference Note. The statement of the Investigating Officer in said case was recorded in the present FIR on 27.11.2023 and also the production warrants of accused Malak Singh were obtained.

The copy of statement of PSI Sandeep Kumar, Special Cell, Delhi in vernacular is **Exhibit PW-51/A23** and English translation thereof is **Exhibit PW-51/A24**.

x. PW-51 further testified that during investigation, accused Malak Singh made a disclosure statement on 21.12.2023 whereby the accused confessed that the act had been done on instructions of Gurpatwant Singh Pannun. Another disclosure statement was also made by the accused on 22.12.2023. The accused further led the police party near canal bridge flowing with NH 152-D where an empty spray can was recovered at his instance. Also, Rs.2,000/- were recovered from almirah of his house which were disclosed by him to be part of Rs.20,000/- received by him for the task of painting the slogan.

xi. Copy of the disclosure statement dated 21.12.2023 in vernacular is **Exhibit PW-51/A25** and English translation thereof is **Exhibit PW-51/A26**; copy of disclosure statement dated 22.12.2023 in vernacular is **Exhibit PW-51/A27** and English translation thereof is **Exhibit PW-51/A28**. The Recovery Memo of empty can of the spray paint in vernacular is **Exhibit PW-51/A29** and English translation thereof is **Exhibit PW-51/A30**; recovery Memo of currency notes amounting to Rs.2,000/- in vernacular is **Exhibit PW-51/A31** and English translation thereof is **Exhibit PW-51/A32**.

The Chargesheet/Final Report under Section 173 Cr.P.C. dated 27.02.2024 in vernacular is **Exhibit PW-51/A33** and English translation thereof is **Exhibit PW-51/A34**. The copy of prosecution sanction under Section 45 of Unlawful Activities (Prevention) Act, 1967 by the Competent Authority is **Exhibit PW-51/A35**.

xii. He further stated that the case is under trial in the concerned Court at Kurukshetra. The charge was framed against the accused on 29.11.2024 and the last date of hearing was 19.12.2024.

xiii. He further stated on oath that SFJ has already been banned by the Central Government in 2019 but despite the same, SFJ is actively and incessantly encouraging the secession of Punjab from the territory of India. The above acts are against the territorial integrity of India and are aimed at inciting local Sikhs against the legal and constitutional framework of the Government of India. If not curbed, these activities could result in the revival of the Khalistani movement.

74. PW-52

i. **PW-52 Anil Subramaniam**, Joint Secretary, Ministry of Home Affairs, North Block, New Delhi tendered his affidavit **Exhibit PW-52/A** after due authorization by the Competent Authority. He deposed that he has been working as Joint Secretary, Ministry of Home Affairs, Internal Security Division, Government of India since 07.12.2022 and in his official capacity as Joint Secretary, Ministry of Home Affairs, Internal Security Division, Government of India, he was both competent and authorised to depose on behalf of the Central Government, Ministry of Home Affairs before this Tribunal. He stated that he was fully conversant with the facts and circumstances related to the extension of the declaration of Sikhs for Justice (SFJ) as an unlawful association under the provisions of Unlawful Activities (Prevention) Act, 1967 as he was part of the entire decision making process, whereby, the Central Government in exercise of the power conferred on it under the provisions of Unlawful Activities (Prevention) Act, 1967 has decided to extend the declaration of Sikhs for Justice (SFJ) as an unlawful association under the provisions of Unlawful Activities (Prevention) Act, 1967. The contents of the affidavit are stated to be based on official record and materials obtained during the discharge of his duties as Joint Secretary, Ministry of Home Affairs. The

documents annexed to the affidavit were stated to be true copies of the respective originals and documents have been marked as exhibits during the course of deposition.

ii. He further deposed that the notification No. S.O. 2660 (E) dated 8th July 2024 was issued by the Ministry of Home Affairs and is based on incriminatory information, material, and inputs received from various sources. These include the inputs from the Government of Punjab, the National Investigation Agency (NIA), and the Central Intelligence Agencies. The inputs specifically highlight the involvement of Sikhs for Justice (SFJ) in unlawful activities. The material provided by Central and State Investigating Agencies show that despite the ban imposed on SFJ in 2019, SFJ and its office bearers have continued the anti-national and secessionist activities. In fact, the activities have intensified and escalated since July 2019.

iii. The records and inputs received from these agencies were analyzed by the Ministry of Home Affairs, and the same reflect that SFJ's activities pose serious risks. The same further reflects that:

- a. SFJ was involved in actions that disrupted the internal security of India and public order. The activities have the potential to disturb peace and threaten the unity, territorial integrity, and sovereignty of India.
- b. SFJ was engaged in continuous secessionist, anti-national, and subversive acts within India and abroad.
- c. SFJ had close ties with separatists, terrorists, and radical elements.
- d. SFJ was actively supporting extremist and militant ideologies aimed at carving out a state of "Khalistan" from India.
- e. SFJ threatened prominent Indian officials, including the Prime Minister, Home Minister, External Affairs Minister, and key State leaders. SFJ also targeted Indian missions and diplomats abroad.
- f. SFJ consistently used social media to provoke Sikh soldiers in the Indian Army to mutiny, urging them to leave the military and join SFJ.

iv. He further deposed that considering the unabated unlawful activities of SFJ, a note was prepared for the Cabinet Committee on Security to extend the declaration of SFJ as an unlawful association for another five years starting 10th July 2024. He testified that he had personally signed this note on 3rd July 2024 and verified its contents.

v. The witness further deposed that a draft notification was also annexed to the note forwarded to the Cabinet. The Cabinet Committee on Security reviewed the proposal in its meeting on 3rd July 2024 and decided to extend the declaration of SFJ as an unlawful association for another five years. The decision was formalized through notification No.S.O. 2660 (E) dated 8th July 2024, published in the Gazette of India. The notification No.S.O. 2660 (E) dated 8th July 2024, published in the Gazette of India is **Exhibit PW-52/A-1**. Further, in compliance with Section 4(1) of the Unlawful Activities (Prevention) Act, 1967, the Central Government constituted the present Unlawful Activities (Prevention) Tribunal for adjudicating whether there is sufficient cause to extend the declaration of SFJ as an unlawful association. On 6th August 2024, a detailed note on SFJ was submitted to the Tribunal. The Background Note/Reference forwarded to this Tribunal in terms of Section 4 of the Unlawful Activities (Prevention) Act, 1967 is **Exhibit PW-52/A-2**.

- vi.** He also deposed that the Government of Punjab provided extensive information about SFJ's unlawful activities. They reported that Punjab Police had registered 55 cases against SFJ under various Acts including Sections 124A, 153A, and 153B of the IPC. In addition, provisions under Unlawful Activities (Prevention) Act, 1967 and the Information Technology Act were also invoked. These cases underscore SFJ's unlawful actions and the relevant details in the respective cases have already been presented before this Tribunal by the competent officers of Punjab Police. The state of Punjab had also adduced evidence in respect of additional FIRs in support of the extension, which were not referred by the MHA but are relevant for the purpose of declaration by this Tribunal. Some of the said FIRs were registered after the notification dated 08th July, 2024 referred to above (i.e. **Exhibit 52/A-1**) was issued by the Ministry of Home Affairs. The additional evidence buttress the decision of the Central Government to extend the ban on SFJ.
- vii.** PW-52 further testified that apart from the State of Punjab, other States i.e. Haryana, Himachal Pradesh, Uttarakhand, NCT of Delhi had also adduced evidence in respect of additional FIRs in support of the extension, which was not referred by the MHA but is relevant for the purpose of declaration by this Tribunal.
- viii.** He deposed that Investigating Agencies from several other States, including GNCTD, State of Uttarakhand, State of Haryana, State of Rajasthan, State of Gujarat, State of Assam, State of Jharkhand, State of Himachal Pradesh, Union Territory of Chandigarh have registered 41 FIRs reflecting involvement of SFJ and its members. Similarly, NIA reported 08 cases against SFJ, which was referred in the Background Note and reveal the unlawful activities of SFJ.
- ix.** He also deposed that evidence in said cases was submitted before this Tribunal by the competent and authorised Police Officers/witnesses from the respective States/NIA. Intelligence inputs received from the Central Intelligence Agencies further confirmed SFJ's involvement in unlawful activities. These inputs were submitted in a sealed cover as they were confidential. The witness submitted that the same cannot be disclosed in public and National interest as well as security concerns. Furthermore, confidentiality in respect of the same was claimed in terms of Section 129 of the Bharatiya Sakshya Adhinyam, 2023 (Corresponding to Section 123 of the Indian Evidence Act) as well as the relevant Sections under Unlawful Activities (Prevention) Act, 1967. An application in this regard was also filed before this Tribunal and is based upon the instructions and satisfaction accorded by the Secretary, Ministry of Home Affairs in terms of Section 129 of the Bharatiya Sakshya Adhinyam, 2023. The official file noting recording the satisfaction of the Secretary, Ministry of Home Affairs was tendered before this Tribunal
- x.** PW-52 further deposed that although the entire details of intelligence inputs are privileged, however to satisfy the conscience of this tribunal that the extension of ban on SFJ is not based on ipse dixit of the Central Government the gist of the information received which could be disclosed in public domain was detailed in the affidavit. As per the intelligence inputs SFJ has continuously engaged in anti-national activities, including the promotion of the so-called 'Referendum 2020'. This campaign blatantly abuses the freedom of speech and challenges India's sovereignty and also incites rebellion.
- xi.** He further testified that SFJ held a convention in Geneva for their 'Referendum 2020', where they launched a voter registration drive targeting Sikhs globally (excluding India). They also launched 25 websites

for this purpose and attempted to recruit participants in Punjab, offering financial incentives to encourage registration. Intelligence Agencies reported that SFJ targeted Sikh pilgrims traveling to Pakistan and recruited underprivileged Sikh youths for pro-Khalistan propaganda and terrorist activities. These recruits were supported by ISI handlers and SFJ's legal advisor, Gurpatwant Singh Pannun, who is designated as a terrorist.

xii. Moreover, SFJ's subversive activities challenge the sovereignty of India and undermine its democratic framework. Their tactics include organizing rallies, conducting social media campaigns, and lobbying international bodies. Youth have been coerced into acts like planting Khalistan flags on government and other buildings, defacing property with pro-Khalistan slogans and disrupting public infrastructure.

xiii. He further testified that in 2023, SFJ targeted the G-20 Summit in New Delhi, issuing open letters to foreign dignitaries advocating for secessionist agenda of SFJ.

xiv. PW-52 deposed that social media platforms reveal SFJ's provocative acts, including calls to boycott Air India, issuing threats to Indian officials and colluding with gangsters abroad to further their campaign. SFJ members defaced religious sites in Vienna, Edmonton, and California and threatened Indian diplomats and their families.

xv. The witness further testified that the following unlawful activities have been reported on social media platforms, whereby, SFJ was making an effort to intensify its secessionist acts:-

- Gurpatwant Singh Pannun promoted SFJ's call to boycott travelling via Air India from November 1 to 19, 2024.
- Gurpatwant Singh Pannun targeted Shri Sanjay Kumar Verma (former Indian High Commissioner to Canada) alleging his involvement in the assassination of the terrorist Hardeep Singh Nijjar (Chief, KTF) in October, 2024. Further, Gurpatwant Singh Pannun offered a reward of \$5,00,000 for anyone who can track Verma's movements in India.
- Gurpatwant Singh Pannun accused the Union Home Minister Shri Amit Shah for killing Nijjar and announced a reward of one million dollars for giving information regarding visit of Shri Amit Shah abroad.
- Gurpatwant Singh Pannun filed a false case against Shri Ajit Doval, NSA, Shri Samant Goel, Former R&AW Chief in the United States of America.
- SFJ hooligans defaced the boundary wall of a Temple in Vienna, vandalized temple in Edmonton (Alberta) and defaced the walls of temple in California.
- SFJ has repeatedly threatened India's political leaders, government officers including police, diplomats, judiciary and even their family members and relatives abroad.
- SFJ has been found colluding with the Punjabi/Sikh gangsters abroad, who are working as ground-level mobilizers to propel its secessionist campaign. Ahead of the Indian Independence Day 2022, Gurpatwant Singh Pannun (Chief Counsel, SFJ) appealed to the jailed gangsters in Punjab, Haryana, Rajasthan and Himachal Pradesh to join '*Khalistan Referendum*' and made a promise of 'monetary remuneration' for the gangsters for joining the secessionist campaign.

xvi. He deposed that the evaluation of the material by the Intelligence Agencies and State Government makes it evident as reflected in the Background Note that SFJ has been:-

- a. promoting anti-national and separatist sentiments prejudicial to the integrity and security of the country;
- b. escalating secessionist movement inside and outside the country;
- c. with active connivance and participation of Non-State Actors and Foreign Intelligence Agencies, mainly ISI, is trying to perpetrate insurgency in the Indian dominion with a sole purpose of violating the integrity and sovereignty of India;

xvii. PW-52 further testified that the evaluation by Intelligence Agencies and State Governments show that SFJ is escalating its secessionist movement actively supported by ISI and other Non-State Actors, to destabilize India.

xviii. He further deposed that the irrefutable evidence on record manifests that Sikhs For Justice (SFJ) is tacitly supporting militancy and incitement of violence in the country on the religious lines and is seeking to revive the Sikh separatist movement i.e. Khalistan movement, in the country which advocates creation of a separate State of Khalistan.

xix. He stated on oath that he is of the view that the Cabinet Committee on Security (CCS), on overall consideration of the totality of the material and inputs placed before it, had rightly accorded its satisfaction and taken the decision, that the incriminating and inculpatory material inputs available against SFJ in unlawful activities are sufficient and necessitates extension of declaration of SFJ as an unlawful association in terms of provisions of Unlawful Activities (Prevention) Act, 1967 for a further period of five years.

xx. PW-52 deposed that in the light of the material available against SFJ, he is of the view that the decision of the Cabinet Committee on Security extending SFJ's designation as an unlawful association is correct and imperative for safeguarding the national security and sovereignty of India.

75. Apart from the witnesses examined on behalf of the Union of India, neither any public witness, nor anyone on behalf of the association (SFJ) appeared to depose before this Tribunal to oppose the ban. As such, there is no oral evidence put forth on behalf of the association (Sikhs for Justice 'SFJ'), nor the witnesses examined on behalf of the Union of India have been cross-examined.

76. The evidence on behalf of the Union of India was concluded on 13th December, 2024. The matter was thereafter fixed for hearing of submissions on behalf of the Union of India which were heard on 16th December, 2024, 19th December, 2024 and 23rd December, 2024.

Written submissions were also filed on record on behalf of the Union of India.

77. Report on the Reference was reserved *vide* order dated 23rd December, 2024.

78. VII. SUBMISSIONS ON BEHALF OF UNION OF INDIA

(i) Learned Additional Solicitor General of India (ASG) urged that over the years, SFJ has been involved in secessionist and terrorist activities and keeping in perspective the repercussions for the security and integrity of the country, SFJ was declared as an 'Unlawful Association' by the Central Government under the provisions of sub-sections (1) and (3) of Section 3 of the Unlawful Activities (Prevention) Act, 1967 initially *vide* notification dated 10th July, 2019 for a period of five years. The Reference therein was

confirmed by the Tribunal comprising of Hon'ble Mr. Justice D.N. Patel, the then Chief Justice, High Court of Delhi, which was published *vide* notification number S.O.112(E) dated 08th January, 2020. He submits that since the secessionist activities of Gurpatwant Singh Pannun and SFJ have continued thereafter, *vide* notification dated 08th July, 2024 in exercise of powers conferred under sub-sections (1) and (3) of Section 3 of UA(P)A, the Central Government has extended the declaration of Sikhs for Justice (SFJ) as an 'unlawful association' for a further period of five years from 10th day of July, 2024, subject to orders which may be made under Section 4 of the Act.

(ii) He further pointed out that indulgence of SFJ in activities prejudicial to internal security of India and public order have the potential of disrupting peace, unity, territorial integrity and sovereignty of India. The activities of SFJ have been found to be in close association with other separatists, terrorists and radical elements within the country and SFJ continues to support the ideology of secession, violent forms of extremism and militancy in Punjab to carve out a so-called State of "Khalistan" out of the territory of Union of India. In the aforesaid pursuit, SFJ has been extending threats even to constitutional functionaries like Hon'ble Prime Minister of India, Hon'ble Home Minister, Hon'ble External Affairs Minister, Chief Ministers of States, National Security Advisor, R&AW Chief etc. Also, Pannun targeted Indian Missions and diplomats abroad and has been trying to provoke the Sikh Soldiers of Indian Army for Mutiny through social media.

He submitted that during pendency of proceedings before this Tribunal, *vide* letter dated 14th October, 2024, issued in the name of SFJ, Shri Sanjay Kumar Verma (former Indian High Commissioner to Canada) was targeted, alleging his involvement in the assassination of the terrorist Hardeep Singh Nijjar (Chief, KTF). Further, a reward/bounty of \$5,00,000 was offered to anyone who can track Verma's movements in India, which reflects that SFJ and its protagonist Gurpatwant Singh Pannun have scant regard for the Constitution of India and has affronted the sovereign authority of the Country.

(iii) Learned ASG referred to 104 FIRs registered in between 2019-2024 showing involvement of SFJ and Gurpatwant Singh Pannun and also relied upon 18 other FIRs adduced as additional evidence before this Tribunal as detailed in preceding paragraphs. He points out that during the period 2019 to 2024, Gurpatwant Singh Pannun released several videos on social media categorically taking the responsibility of unlawful activities committed by the members of Sikhs for Justice (SFJ) in India.

(iv) He emphasizes that due to active role played by Gurpatwant Singh Pannun in promoting separatist and anti-India activities, particularly advocating creation of an independent State of Khalistan, Pannun has been declared as 'terrorist' by the Union of India under the Unlawful Activities (Prevention) Act, 1967 *vide* notification No. S.O.2170(E) dated 01st July, 2020. The same is reproduced for reference:-

“NOTIFICATION
New Delhi, the 1st July, 2020

S.O.2170 (E).-Whereas, the Unlawful Activities (Prevention) Act, 1967(37 of 1967)(hereinafter referred to as the said Act) has been enacted to provide for more effective prevention of certain unlawful activities of individuals and associations and for dealing with terrorist activities and for matters connected therewith;

And whereas, clause (a) of sub-section (1) of section 35 of the said Act empowers the Union of India to notify the name of an individual in the Fourth Schedule to the said

Act, if it believes that he is involved in terrorism;

And whereas, Gurpatwant Singh Pannun, S/o Late Mohinder Singh Pannun, originally r/o Khankot, PS Rambagh, Amritsar City, formed "SIKHS FOR JUSTICE" and is Attorney, Law and Legal Advisor of this Organization."SIKHS FOR JUSTICE' has been declared as Unlawful Association by the Government of India, under the said Act:

And whereas, Gurpatwant Singh Pannun is spread heading a campaign "Referendum 2020". He has been found actively in touch with United Kingdom based Paramjit Singh @ Pamma, a BABBAR KHALSA INTERNATIONAL terrorist, Canada based Hardeep Singh @ Nijjar (KHALISTAN TIGER FORCE) and Malki Singh Fauji (INTERNATIONAL SIKH YOUTH FEDERATION/BABBAR KHALSA INTERNATIONAL) and several overseas Punjab based Hardliners;

And whereas. Gurpatwant Singh Pannun has been issuing appeals and propagating through social media regularly to Punjab based gangsters and youth to fight for the cause of independent state of Khalistan, challenging the sovereignty, integrity and security of the country. He has demanded and advocating a separate State of Khalistan;

And whereas, Gurpatwant Singh Pannun, presently residing in United States of America. is instigating and abetting youths to join them in Khalistan Referendum 2020 and providing financial help to youths in region for creating violence or fear to disturb peace in the region ;

And whereas, Gurpatwant Singh Pannun is accused in various cases registered and being investigated by the Punjab Police related to Referendum 2020 and a case registered by National Investigation Agency:

And whereas, the Union of India believes that Gurpatwant Singh Pannun is involved in terrorism and Gurpatwant Singh Pannun is to be notified as a terrorist under the said Act;

Now. therefore, in exercise of the powers conferred by clause(u) of sub-section (1) of section 35 of the Unlawful Activities (Prevention) Act, 1967, the Union of India hereby makes the following amendment in the Fourth Schedule to the said Act, namely:-

"In the Fourth Schedule to the said Act, after serial number 10 and entries relating thereto, the following serial numbers and entries shall be inserted, namely:-

"11. Gurpatwant Singh Pannun"

**[F.No.17011/16/2020-CT-1]
ASHUTOSH AGNIHOTRI, Jt. Secy."**

(v) Learned ASG further submits that FIRs supported by evidence on record reflect that Gurpatwant Singh Pannun issued provocative public statements and threats, including calls for vandalism of Indian national flag and advocated participation in "Referendum 2020" campaigns. Intelligence reports also establish connections of Gurpatwant Singh Pannun with Pakistan backed militant groups such as 'Babbar Khalsa International' operating through Paramjit Singh @ Pamma, a fugitive terrorist operating from United Kingdom; 'Khalistan Tiger Force' operating through fugitive terrorist Hardeep Singh @ Nijjar (since deceased) based in Canada; 'International Sikh Youth Federation/Babbar Khalsa International' operating through fugitive terrorist Malki Singh Fauji along with other persons. Pannun has also been

found to be funding terrorist operations and coordinating with Inter-Services Intelligence (ISI) operated by Pakistan to destabilize Indian sovereignty and wage a proxy war.

(vi) Learned ASG also urged that non-participation of SFJ in the present proceedings is by design, since the Notice of the proceedings was duly served on SFJ.

(vii) He points out that India is facing proxy war from Pakistan/neighbouring nations having inimical intention towards India. Further, evidence of Pakistan's ISI perpetrating terrorism in Jammu and Kashmir region has come on record during the adjudication of proceedings in respect of other associations under UA(P)A for declaring them as unlawful associations i.e. (i) Jammu and Kashmir Democratic Freedom Party (JKDFP), (ii) Muslim League Jammu Kashmir (Masrat Alam faction)/SFJ-MA (iii) Tehreek-e-Hurriyat, Jammu and Kashmir (TeH) (iv) Jamaat-e-Islami Jammu Kashmir (Jel, J&K) (v) Muslim Conference Jammu & Kashmir (Bhat faction) (vi) Muslim Conference Jammu & Kashmir (Sumji faction) (vii) Jammu Kashmir National Front (JKNF) (VIII) Jammu and Kashmir Peoples Freedom League (ix) Four factions of Jammu and Kashmir Peoples Freedom League (x) Yasin Malik's Jammu Kashmir Liberation Front (JKLF-Y). In this regard, the decision of the proceedings held by the respective Tribunals constituted under UA(P)A is relied upon, as notified by way of gazette notifications.

79. Learned ASG further contends that the evidence of witnesses led on record on behalf of Union of India, in respect of FIRs registered across the country prove the secessionist activities by Sikhs for Justice (SFJ) through its protagonist Gurpatwant Singh Pannun and other associations as under:-

- i. PW 20 proved the documents of RC-22/2022/NIA/DLI dated 18.05.2022 reflecting SFJ's involvement in smuggling of improvised explosive device from across the border to Burail Jail, Chandigarh.
- ii. PW 20 further proved the documents of RC-35/2021/NIA/DLI dated 31.12.2021 and PW 18 proved the documents of RC-19/2020/NIA dated 05.04.2020 reflecting SFJ's involvement in recruiting and radicalizing youth in Punjab through social media and encrypted messaging platforms - raising funds and using smuggling networks to procure arms, ammunition, and explosives to carry out terror activities and revive terrorism in Punjab in the name of "Khalistan Referendum".
- iii. PW 3 proved the documents of RC-12/2021/NIA/DLI dated 18.06.2021 and PW 17 proved the documents of RC-02/2019/NIA/DLI dated 15.01.2019 reflecting the calls made by Gurpatwant Singh Pannun on social media to incite mutiny in Indian Army and engineer balkanization of India.
- iv. PW 15 proved the documents of RC-30/2023/NIA/DLI dated 20.11.2023 which reflects intimidating threats issued by Gurpatwant Singh Pannun in respect of disruption of essential services, including power generation and global occlusion of Air India flights.

- v. PW 16 proved the documents of RC-40/2020/NIA/DLI dated 15.12.2020 which reflects that SFJ and/or Gurpatwant Singh Pannun are spearheading a conspiracy in league with Khalistani separatists, foreign nations, and non-state actor's hostile to India by infusing funds to galvanize the Khalistani movement.
- vi. PW 20 further proved the documents of RC-30/2020/NIA/DLI dated 14.08.2020 which reflects terror financing. Further, Khalistani flags were hoisted by accused recruited by Gurpatwant Singh Pannun through cyberspace and social media and who were paid and instructed by Gurpatwant Singh Pannun to execute the offence. The responsibility for commission of crime was thereafter taken by Gurpatwant Singh Pannun by circulating a video on social media.
- vii. PW 11 proved the documents of FIR No. 317/2023 relating to death threat/appeal to assassinate Hon'ble the Prime Minister of India by Gurpatwant Singh Pannun.
- viii. PW 6 proved the documents of FIR No.01 dated 03.01.2023 relating to death threat/appeal to assassinate Shri Rahul Gandhi, Member of Parliament from Congress Party by Gurpatwant Singh Pannun.
- ix. PW 19 proved the documents of FIR No.34/2021 relating to death threat/appeal to assassinate Shri Captain Amarinder Singh, the then Chief Minister of Punjab by Gurpatwant Singh Pannun.
- x. PW 19 proved the documents of FIR No. 24/2022 seeking independence of Punjab by Gurpatwant Singh Pannun.
- xi. PW 19 proved the documents of FIR No.27/2022 relating to call issued by Gurpatwant Singh Pannun to Sikh soldiers of Indian Army to use their weapons for not defending borders of India but to liberate from control of India.
- xii. PW 10 *w.r.t.* FIR No.168/2020; PW 43 *w.r.t.* FIR No.43/2022 and PW 21 *w.r.t.* FIR 65/2022 proved the documents relating to cases in which call was made by Gurpatwant Singh Pannun to burn the Indian flag and Indian Constitution.
- xiii. PW 10 proved the documents of FIR No. 4/2024 relating to threat issued by Gurpatwant Singh Pannun to destroy a Hindu temple to incite religious feelings for promoting Khalistan Referendum.

- xiv. PW 50 proved the documents *w.r.t.* FIR No. 116/2022; PW 29 *w.r.t.* FIR No.63/2023 and PW 50 *w.r.t.* FIR No.116/2020, reflecting the cases where Khalistani graffiti was painted, Khalistani flags are hoisted or slogans were written near temple premises at behest of Gurpatwant Singh Pannun of which he admitted the responsibility by circulating videos on social media.
- xv. PW 46 proved the documents of FIR No.77/2022 relating to hoisting of Khalistani banners on public premises on instructions of Gurpatwant Singh Pannun, of which he admitted responsibility by circulating video on social media.
- xvi. PW 1 *w.r.t.* FIR No. 18/2023; PW 38 *w.r.t.* FIR No.76/2022, FIR No. 66/2022 and FIR 102/2022; PW 45 *w.r.t.* FIR No. 207/2023; PW 14 *w.r.t.* FIR No. 52/2022; PW 7 *w.r.t.* FIR No.130/2022; PW 50 *w.r.t.* FIR No.118/2022; PW 32 *w.r.t.* FIR No. 89/2022; PW 32 *w.r.t.* FIR No. 91/2022 and PW 35 *w.r.t.* FIR No. 13/2023 proved the cases where Khalistani flags were hoisted by accused. Further, Gurpatwant Singh Pannun through cyberspace and social media took responsibility for the commission of crime by circulating videos on social media.
- xvii. PW 1 proved the documents of FIR No.28/2021 relating to terror financing case where money was offered for raising the Khalistani flag at India Gate on Republic Day.
- xviii. PW 51 proved the documents with reference to FIR No. 81/2023; PW 10 with reference to FIR No.23/2023 and PW 43 with reference to FIR No.48/2023, which reflect that G-20 summit was attempted to be obstructed by Gurpatwant Singh Pannun in the name of the Khalistan movement.
- xix. PW 37 proved the documents of FIR No.398/2022 relating to cases of hoisting of Khalistani banners.
- xx. PW 13 proved the documents with reference to FIR No.107/2022; PW 21 with reference to FIR No.62/2023; PW 9 with reference to FIR No.233/2023; PW 51 with reference to FIR No.229/2022 and PW 47 with reference to FIR No.221/2022 reflecting the cases where Khalistani flags or banners were hoisted.
- xxi. PW 40 proved the documents with reference to FIR No.03/2019 and PW 36 with reference to FIR No.148/2022 reflecting the offences committed under the Arms Act for furthering the cause of SFJ.

- xxii. PW 2 *w.r.t.* FIR No.314/2024 and FIR No. 315/2024; PW 26 *w.r.t.* FIR No.137/2020; PW 51 *w.r.t.* FIR No.597/2020; PW 26 *w.r.t.* FIR No.52/2021; PW 24 *w.r.t.* FIR No.31/2022; PW 42 *w.r.t.* FIR No.11191067230030/2023 and FIR No. 11191067230127/2023; PW 40 *w.r.t.* FIR No.6/2020; PW 49 *w.r.t.* FIR No. 43/2020; PW 19 *w.r.t.* FIR No.12/2020; PW 44 *w.r.t.* FIR No.299/2018; PW 30 *w.r.t.* FIR No.04/2021; PW 31 *w.r.t.* FIR No.02/2023 and FIR No.03/2023; PW 1 *w.r.t.* FIR No.06/2022; PW 48 *w.r.t.* FIR No.69/2024; PW 44 *w.r.t.* FIR No.134/2023 and PW 26 *w.r.t.* FIR No.45/2021, proved the cases which reflect that Gurpatwant Singh Pannun used various platforms to radicalize gullible youth and spread threats by sending pre-recorded audio messages.
- xxiii. PW 2 proved the documents with reference to FIR No.697/2023 and PW 41 with reference to FIR No.56/2023, relating to cases of pro-Khalistani graffiti painted on multiple public premises on the instructions of Gurpatwant Singh Pannun.
- xxiv. PW 8 proved the document of FIR No.93/2016; PW 33 proved the documents of FIR No.46/2018 and PW 27 proved the documents of FIR No.972/2020, reflecting the cases of weapons recovered to re-activate terrorism in Punjab on the instructions of the Khalistan Liberation Force.
- xxv. PW 37 proved the documents of FIR No.71/2023 reflecting the cases where Khalistani flags were hoisted and graffiti painted on public premises in the name of SFJ.
- xxvi. PW 2 *w.r.t.* FIR No.705/2023, FIR No.28/2023, FIR No.75/2024 and FIR No.469/2023; PW 1 *w.r.t.* FIR No.47/2024; PW 49 *w.r.t.* FIR No.149/2017; PW 12 *w.r.t.* FIR No.154/2021; PW 36 *w.r.t.* FIR No.144/2021; PW 33 *w.r.t.* FIR No.77/2022; PW 35 *w.r.t.* FIR No.124/2023; PW 21 *w.r.t.* FIR No.119/2022; PW 27 *w.r.t.* FIR No. 414/2022; PW 25 *w.r.t.* FIR No.627/2022; PW 23 *w.r.t.* FIR No.07.04.2023; PW 25 *w.r.t.* FIR No. 473/2023; PW 1 *w.r.t.* FIR No.106/2024; PW 22 *w.r.t.* FIR No.51/2023; PW 39 *w.r.t.* FIR No.91/2020 and PW 46 *w.r.t.* FIR No.230/2023 proved the documents in respective FIRs relating to cases where graffiti was painted.
- xxvii. PW 1 proved the documents of FIR No.179/2020 relating to case of automated calls made by SFJ with recorded voice of Gurpatwant Singh Pannun, propagating the hoisting of Khalistani flag on Red Fort, bringing down the national tricolor and instigating communal disturbance by promoting the pro-Khalistan Referendum-2020 agenda on social media.
- xxviii. PW 1 further proved the documents of FIR No.211/2021 relating to the case where Gurpatwant Singh Pannun offered \$1 million to uniformed police personnel for preventing

Hon'ble Prime Minister of India Shri Narendra Modi from hoisting the national flag at Red Fort.

- xxix. PW 40 proved the documents of FIR No.07/2020 relating to cases of pasting of "Punjab Referendum 2020" Posters.
- xxx. PW 10 proved the documents of FIR No.69/2022 relating to the case of promotion of "KHALISTAN REFERENDUM" through circulation of videos on social media.
- xxxi. PW 40 *w.r.t.* FIR No. 02/2024; PW 33 *w.r.t.* FIR No.10/2024; PW 46 *w.r.t.* FIR No.230/2023; PW 5 *w.r.t.* FIR No.119/2022; PW21 *w.r.t.* FIR No.73/2023 and PW 34 *w.r.t.* FIR No.201/2022 proved the documents in respective FIRs relating to promotion of Khalistan.
- xxxii. PW 4 proved the documents of FIR No.42/2022 relating to the case where posters were pasted stating that revenge would be taken by Sikh community and hailing Bhindranwala.
- xxxiii. PW 36 *w.r.t.* FIR No.179/2018 and FIR No.132/2018 stated that though there was no direct connection of the offence with the SFJ or Gurpatwant Singh Pannun but the cases pertain to furthering the Khalistani cause.

80. Learned ASG further submitted that the Union of India has also placed reliance on FIRs wherein 'Untrace Reports' have been filed by the Investigating Agencies as they manifest that the recruits of SFJ, clandestinely and behind the veil of anonymity, are perpetrating SFJ's secessionist agenda. He emphasized that the act of instigating recruits to paint graffiti and host Khalistani flags & banners, secretly, in the darkness of night, clearly are measures of psychological warfare employed by SFJ to surreptitiously infuse, espouse and incite the feeling of dis-affection in the hearts of Sikh community towards Indian Dominion. Further, the same is an attempt of sowing seeds of rebellion and radicalisation in the gullible youth in the name of religion for the purpose of achieving cession of territory of Punjab from India which is required to be neutralised with iron hands. He emphasized that the aforesaid FIRs are relevant and constitute sufficient cause for declaring SFJ as an Unlawful Association under the provisions of UA(P)A

The details of said FIRs wherein 'Untrace Reports' have been filed is tabulated as under:-

Sr no	Sr No in the Reference	Description Of The FIR Along With The Number Of Witness Who
	<u>Note</u>	<u>Has Deposed About It</u>

1.	29.	FIR No. 42 dated 02.06.2022 u/s 153B IPC at PS Kalanaur, district Gurdaspur – PW-4
2.	40.	FIR No. 148 dated 15.07.2022 u/s 153A IPC and section 3 Punjab Prevention of Defacement Property Act at PS Kotwali, District Patiala PW-23
3.	43.	FIR No. 01 dated 03.01.2023 u/s 153-A, 153-B, 124-A IPC at PS Sadar, District Muktsar - PW 6
4.	50.	FIR No. 119 dated 29.11.2023 u/s 153B IPC at PS GRP, Amritsar - PW-5
5.	56.	FIR No. 137 dated 02.07.2020 u/s 124A, 153A IPC 10A, 13 UA(P)A at PS Bhondsi, district Gurgaon- PW 26
6.	57.	FIR No. 597 dated 12.07.2020 u/s 124A, 153A IPC, 10A, 13 UA(P)A at PS Thanesar City, Kurukshetra- PW 51
7.	59.	FIR No. 52 dated 29.08.2021 u/s 124A, 153A, 506 IPC & 10-A/13 UA(P)A at PS Cyber Crime, Gurgaon - PW-26
8.	62.	FIR No. 31 dated 16.07.2022 u/s 120B, 124A, 336, 379 IPC, 03 PDPP Act 1984, 66F IT Act 2000, 10/13 UA(P)A 1967 and No. 37 Amendment 2012 and 150 Railway Act No. 24 of 1989 at PS Cyber Crime, District Hisar - PW24
9.	63.	FIR No. 627 dated 07.12.2022 u/s 120B, 124A IPC and 13 UA(P)A 1967 at PS City Mandi Dabwali, district Sirsa- PW27
10.	64.	FIR No. 71 dated 04.03.2023 u/s 153A IPC at PS Sadar, Ambala City, district Ambala- PW37
11.	67.	FIR No. 473 dated 31.07.2023 u/s 120-B, 124-A IPC & 13 UA(P)A, 1967 at PS City Mandi Dabwali, district Sirsa - PW-25
12.	72.	FIR No. 04 dated 31.07.2021 registered at PS Cyber Crime, Shimla u/s 124, 153A, 120B, 506 IPC, Sec 3 UA(P)A and 66C IT Act 2008 - PW 30
13.	95.	FIR No. 51 dated 26.01.2023 u/s 3 of Delhi Prevention of Defacement of Property Act at PS Sector-36, Chandigarh - PW 22

81. Learned ASG further contended that intelligence reports manifest that SFJ and Gurpatwant Singh Pannun are also involved in agenda against the Union of India through an online campaign, the so-called ‘Referendum 2020’, in pursuance of its objective to carve out an independent political entity “Khalistan”. Further, Intelligence Agencies reported that online campaign was initiated by SFJ under the garb and cloak of freedom of speech and expression guaranteed under Article 19(1)(a) of the Constitution of India but behind the cloak there is a sinister agenda of the SFJ to attack the integrity and sovereignty of India by advocating armed rebellion and aggression against the lawfully constituted Government of the State.

The intelligence reports also revealed that SFJ organized a Convention at Geneva for its Referendum 2020 wherein it announced the starting of voter registration for Sikh People of all the countries except India with the launch of a web portal. Around 25 websites were launched for registration of voters from Punjab and SFJ announced to carry out door to door voter registration in Punjab and to pay a monthly stipend of Rs.7500/- for execution of this registration. Appeals were issued to SGPC members, Panchayat members and Sarpanches to support the voter registration process and they were threatened not to leak out any information to the police.

The Intelligence Agencies further reported that SFJ had made attempts to incite the Indian Sikh Jathas travelling to Pakistan for pilgrimage, to access its websites. SFJ was also undertaking recruitment of underprivileged Sikh youths for carrying out pro-Khalistan propaganda and conducting terrorist acts or other subversive activities in lieu of money. Such elements were found to be receiving instructions and other support from Pak ISI handlers.

82. Learned ASG also pointed out that evidence on record reveals that SFJ was directly involved in activities targeting the G-20 Summit 2023 which was held in New Delhi as an open letter was issued to Foreign Ministers of participating countries, seeking their support to 'Khalistan Referendum'. Further, Gurpatwant Singh Pannun released an audio message wherein he provoked Kashmiri Muslims to leave the Kashmir Valley and to come to Delhi and block Delhi during the G-20 Summit.

83. Apart from above, learned ASG further pointed out to following subversive activities of SFJ:-

- (a) Gurpatwant Singh Pannun promoted SFJ's call to boycott travelling via Air India from 1 to 19 November, 2024.
- (b) Pannun allegedly accused the Hon'ble Union Home Minister Shri Amit Shah for killing Nijjar and announced a reward of one million dollars for giving information about Shri Amit Shah's visit abroad.
- (c) Pannun filed a case against Shri Ajit Doval, NSA, Shri Samant Goel, Former R&AW Chief in the US.
- (d) SFJ hooligans defaced the boundary wall of a Temple in Vienna, vandalized temple in Edmonton (Alberta), defaced the walls of temple in California.
- (e) SFJ repeatedly threatened India's political leaders, government officers including police, diplomats, judiciary and even their family members and relatives abroad.
- (f) SFJ has been found colluding with the Punjabi/Sikh gangsters abroad, who are working as ground-level mobilizers to propel its secessionist campaign. Ahead of the Indian Independence Day 2022, Gurpatwant Singh Pannun (Chief Counsel, SFJ) appealed to the

jailed gangsters in Punjab, Haryana, Rajasthan and Himachal Pradesh to join ‘Khalistan Referendum’ and made an open promise of ‘monetary remuneration’ for the gangsters for joining the secessionist campaign.

84. Learned ASG concluded by submitting that nature of activities of SFJ manifest that the association functions as an agent of inimical forces from across the border, who are desirous of fomenting trouble in the country and perpetrate a proxy war. This is stated to be evident from the nature of propaganda/slogans propagated by Gurpatwant Singh Pannun, which seek to glorify anything which is against the interest of the country as well as the vitriolic vilification campaign against the members of security forces and other senior officials/bureaucrats/ambassadors. He submits that inciting mutiny in the army and appeal made to the cadre to assassinate Constitutional functionaries prove malefic intentions of Gurpatwant Singh Pannun and SFJ.

85. Reliance was further placed upon the reports submitted by various Tribunals whereby organizations such as “Student Islamic Movement of India (SIMI)”; “Islamic Research Foundation (IRF)”; “Popular Front of India (PFI) and its Associates”; “Muslim League Jammu Kashmir (Masarat Alam Faction) (MLJK-MA)”; “Tehreek-e-Hurriyat, Jammu and Kashmir (TeH)”; “Jamaat-e-Islami Jammu and Kashmir (JeL)”; “Jammu and Kashmir Liberation Front (Mohd. Yasin Malik Faction) (JKLF-Y)”; “Four Factions of Jammu and Kashmir Peoples League (JKPL)”; “Jammu and Kashmir Democratic Freedom Party (JKDFP)”; “Jammu Kashmir National Front (JKNF)”; “Jammu and Kashmir Peoples Freedom League (JKPFL)”; “Muslim Conference Jammu and Kashmir (Bhat Faction) (MCJK-B)”; “Muslim Conference Jammu and Kashmir (Sumji Faction) (MCJK-S)”; “Sikhs for Justice (SFJ)” were declared as unlawful association under the provisions of Unlawful Activities (Prevention) Act, 1967 and the Reference was answered in affirmative by the respective Tribunals.

86. In support of the submissions, learned ASG further placed reliance upon judgments passed in *Jamaat-E-Islami Hind v. Union of India*, (1995) 1 SCC 428; *Iqbal Singh Marwah v. Meenakshi Marwah*, (2005) 4 SCC 370; *Union of India v. Madras Bar Association*, (2010) 11 SCC 1; *Union of India v. T.R. Sharma*, AIR 1957 SC 882; *Tata Consultancy Services Limited v. Cyrus Investments private Limited*, (2021) 9 SCC 449; *Kishan Singh v. Gurupal Singh*, (2010) 8 SCC 775; *Raj Kumar Singh v. State of Bihar*, (1986) 4 SCC 407; *Ex-Armymen’s Protection Services Private Ltd. v. UOI*, (2014) 5 SCC 409; *UOI v. Satnam Singh*, AIR 2018 Del 72 and *Arup Bhuyan v. State of Assam*, (2023) 8 SCC 745.

VIII. STATUTORY PROVISIONS AND NATURE & SCOPE OF PROCEEDINGS BEFORE THE TRIBUNAL

Objectives of UA(P)A, 1967

87. The main objective of UA(P)A is to make powers available for dealing with activities directed against the integrity and sovereignty of India. In the aforesaid context, the Introduction and the Statement of Objects and Reasons of UA(P)A, 1967 may be noticed as under:-

“Introduction:

The National Integration Council appointed a Committee on National Integration and Regionalisation to look into, inter alia, the aspect of putting reasonable restrictions in the interests of the sovereignty and integrity of India. Pursuant to the acceptance of recommendations of the Committee the Constitution (Sixteenth Amendment) Act, 1963 was enacted to impose, by law, reasonable restrictions in the interests of the sovereignty and integrity of India. In order to implement the provisions of 1963 Act the Unlawful Activities (Prevention) Bill was introduced in the Parliament.

Statement of Objects and Reasons.—*Pursuant to the acceptance by Government of a unanimous recommendation of the Committee on National Integration and Regionalism appointed by the National Integration Council, the Constitution (Sixth Amendment) Act, 1963, was enacted empowering Parliament to impose, by law, reasonable restrictions in the interests of the sovereignty and integrity of India, on the—*

(i) *freedom of speech and expression;*

(ii) *right to assemble peaceably and without arms; and*

(iii) *right to form associations or unions.*

2. The object of this Bill is to make powers available for dealing with activities directed against the integrity and sovereignty of India.”

88. The sovereignty, unity and “territorial integrity of India” is a judicially recognized inviolable and basic feature of Indian Constitution as noticed by the Hon’ble Supreme Court of India in the celebrated judgment of *Kesavananda Bharati v. State of Kerala, (1973) 4 SCC 225*. The relevant extract in para 582 is apt to be noticed:-

“582. The basic structure of the Constitution is not a vague concept and the apprehensions expressed on behalf of the respondents that neither the citizen nor the Parliament would be able to understand it are unfounded. If the historical background, the preamble, the entire scheme of the Constitution, relevant provisions thereof including Article 368 are kept in mind there can be no difficulty in discerning that the following can be regarded as the basic elements of the constitutional structure. (These cannot be catalogued but can only be illustrated):

(1) *The supremacy of the Constitution.*

(2) *Republican and Democratic form of government and sovereignty of the country.*

(3) *Secular and federal character of the Constitution.*

(4) *Demarcation of power between the Legislature, the executive and the judiciary.*

(5) *The dignity of the individual secured by the various freedoms and basic rights in Part III and the mandate to build a welfare State contained in Part IV.*

(6) ***The unity and the integrity of the Nation.”***

89. In *Union of India v. Satnam Singh, AIR 2018 Del 72*, it was observed that the Constitution (Sixteenth Amendment) Act was brought in order to combat secessionist agitations by organizations, including the Plebiscite Front in Kashmir, with the purpose to guard against the freedom of speech and expression being used to assail the territorial integrity and sovereignty of the Union. It was held in para 14 and 15 as under:-

“14. It thus becomes crucial to determine the meaning of the phrase ‘prejudicial to the sovereignty and integrity of India’ used in the Act. Apart from the Act, the phrase finds mention in clauses (2), (3), and (4) of Article 19 of the Constitution of India, where it was added as a ground for restriction on the freedom of expression. This was inserted by the Constitution (Sixteenth Amendment) Act, 1963, in order to combat secessionist agitation and conduct from organizations such as DMK in the South and Plebiscite Front in Kashmir, and activities in pursuance thereof which might not possibly be brought within the purview of the expression ‘security of the State’. It was made to guard the freedom of speech and expression being used to assail the territorial integrity and sovereignty of the Union.

15. It was pointed out that any legislation that is undertaken in this behalf, ought to be comprehensive and effective enough to check indirect devices to carry on such movements, such as the burning of the Constitution of India or the refusal to take the oath of allegiance, or the raising of flags in any way simulating the flag of a foreign State with a view to encouraging feelings of allegiance to such State and gathering people having such allegiance. [Vide Question in Parliament re. hoisting of the Plebiscite Front Flag in Kashmir (Statements, 11.12.64)]. It is to curb the same menace that the Unlawful Activities (Prevention) Act, 1967 was subsequently enacted

90. Apart from above, as pointed out by learned ASG, in *Arup Bhuyan v. State of Assam*, (2023) 8 SCC 745, the Hon'ble Supreme Court of India has again taken note of the fact that the UA(P)A was enacted pursuant to the amendment brought about in Articles 19(2), (3) and (4) vide the Constitution (Sixteenth Amendment) Act, 1963. It has been observed therein that the main objective of UA(P)A is to make powers available for dealing with activities directed against the integrity and sovereignty of India. The observations in para 80 to 85 are apt to be quoted:-

“80. Thus, the rights guaranteed under Article 19(1)(a) (right to freedom of speech and expression) and under Article 19(1)(c) (Right to form association or unions) are not absolute rights, but are subject to reasonable restrictions as per Articles 19(2) and 19(4) of the Constitution of India. Articles 19(2), (3) and (4) have been amended vide the Constitution (Sixteenth Amendment) Act, 1963 and the words “sovereignty and integrity of India” have been inserted.

81. Therefore, as per Articles 19(2), (3) and (4) nothing in sub-clauses (a), (b) and (c) of clause (1) of Article 19 shall affect the operation of any existing law or prevent the State from making any law insofar as such law imposes reasonable restrictions on the exercises of the right conferred by the said sub-clauses in the interests of sovereignty and integrity of India, the security of State As per Article 19(4) nothing in sub-clause (c) (Right to form Associations or Unions) shall affect the operation of any existing law insofar as it imposes, or prevents the State from making any law imposing, in the interests of sovereignty and integrity of India or public order or morality, reasonable restrictions on the exercise of the right conferred by the said sub-clause.

82. At this stage the Statement of Objects and Reasons for amending Articles 19(2), (3) and (4) are required to be referred to and considered.

83. The Statements of Objects and Reasons appended to the Constitution (Sixteenth Amendment) Bill, 1963 which was enacted as the Constitution (Sixteenth Amendment) Act, 1963 reads as under:

“Statement of Objects and Reasons

The Committee on National Integration and Regionalism appointed by the National Integration Council recommended that Article 19 of the Constitution be so amended that adequate powers become available for the preservation and maintenance of the integrity, and sovereignty of the Union. The Committee were further of the view that every candidate for the membership of a State Legislature or Parliament, and every aspirant to, and incumbent of, public office should pledge himself to uphold the Constitution and to preserve the integrity and sovereignty of the Union and that forms of oath in the Third Schedule to the Constitution should be suitably amended for the purpose. It is proposed to give effect to these recommendations by amending clauses (2), (3) and (4)

of Article 19 for enabling the State to make any law imposing reasonable restrictions on the exercise of the rights conferred by sub-clauses (a), (b) and (c) of clause (1) of that article in the interests of the sovereignty and integrity of India.”

84. The UAPA, 1967 has been enacted in exercise of powers conferred under Articles 19(2) and (4) of the Constitution of India. At this stage, it is required to be noted that exceptions to the freedom to form associations under Article 19(1) was inserted in the form of sovereignty and integrity of India under Article 19(4), after the National Integration Council (“NIC”) appointed a Committee on National Integration and Regionalisation. The said Committee was to look into the aspect of putting reasonable restrictions in the interests of the sovereignty and integrity of India. Pursuant to the acceptance of the recommendations of the said Committee, the Constitution (Sixteenth Amendment) Act, 1963 came to be enacted to impose by law, reasonable restrictions in the interests of sovereignty and integrity of India. In order to implement the provisions of the 1963 Act, the Unlawful Activities (Prevention) Bill was introduced in Parliament.

85. The main objective of the UAPA is to make powers available for dealing with activities directed against the integrity and sovereignty of India. It is also required to be noted that pursuant to the recommendation of the Committee on National Integration and Regionalisation appointed by the National Integration Council Act on whose recommendation the Constitution (Sixteenth Amendment) Act, 1963 was enacted, UAPA has been enacted. It appears that the National Integration Council appointed a Committee on National Integration and Regionalisation to look into, inter alia, the aspect of putting reasonable restrictions in the interests of sovereignty and integrity of India and thereafter the UAPA has been enacted. Therefore, the UAPA has been enacted to make powers available for dealing with the activities directed against integrity and sovereignty of India.”

Relevant Provisions under UA(P)A, 1967

91. As per Section 2(p) of the Unlawful Activities (Prevention) Act, 1967, “**Unlawful Association**” means:

“2(p) **“unlawful association”** means any association-

(i) which has for its object any unlawful activity, or which encourages or aids persons to undertake any unlawful activity, or of which the members undertake such activity; or

(ii) which has for its object any activity which is punishable under Section 153A or Section 153B of the Indian Penal Code (45 of 1860), or which encourages or aids persons to undertake any such activity, or of which the members undertake any such activity:

Provided that nothing contained in sub-clause (ii), shall apply to the State of Jammu and Kashmir”.

Further, Section 2(o) of the UA(P)A defines “**Unlawful Activity**” as under:

“2(o) **“unlawful activity”**, in relation to an individual or association, means any action taken by such individual or association (whether by committing an act or by words, either spoken or written, or by signs or by visible representation or otherwise),-

(i) Which is intended, or supports any claim, to bring about, on any ground whatsoever, the cession of a part of the territory of India or, the secession of a part of the territory of India from the Union, or which incites any individual or group of individuals to bring about such cession or secession; or

(ii) Which disclaims, questions, disrupts, or is intended to disrupt the sovereignty and territorial integrity of India; or

(iii) Which causes or is intended to cause disaffection against India;

92. For the purpose of conduct of proceedings, **Section 3, 4, 5 and 9** of the Unlawful Activities (Prevention) Act, 1967 along with **Rules 3 & 5** of the Unlawful Activities (Prevention) Rules 1968 as amended upto date, are relevant and may be referred:-

“3. Declaration of an association as unlawful.— (1) *If the Central Government is of opinion that any association is, or has become, an unlawful association, it may, by notification in the Official Gazette, declare such association to be unlawful.*

(2) *Every such notification shall specify the grounds on which it is issued and such other particulars as the Central Government may consider necessary: Provided that nothing in this sub-section shall require the Central Government to disclose any fact which it considers to be against the public interest to disclose.*

(3) *No such notification shall have effect until the Tribunal has, by an order made under section 4, confirmed the declaration made therein and the order is published in the Official Gazette:*

Provided that if the Central Government is of opinion that circumstances exist which render it necessary for that Government to declare an association to be unlawful with immediate effect, it may, for reasons to be stated in writing, direct that the notification shall, subject to any order that may be made under section 4, have effect from the date of its publication in the Official Gazette.

(4) *Every such notification shall, in addition to its publication in the Official Gazette, be published in not less than one daily newspaper having circulation in the State in which the principal office, if any, of the association affected is situated, and shall be served on such association in such manner as the Central Government may think fit and all or any of the following modes may be followed in effecting such service, namely:—*

(a) *by affixing a copy of the notification to some conspicuous part of the office, if any of the association; or*

(b) *by serving a copy of the notification, where possible, on the principal office-bearers, if any of the association; or*

(c) *by proclaiming by beat of drum or by means of loudspeakers, the contents of the notification in the area in which the activities of the association are ordinarily carried on; or*

(d) *in such other manner as may be prescribed.*

4. Reference to Tribunal.— (1) *Where any association has been declared unlawful by a notification issued under sub-section (1) of section 3, the Central Government shall, within thirty days from the date of the publication of the notification under the said sub-section, refer the notification to the Tribunal for the purpose of adjudicating whether or not there is sufficient cause for declaring the association unlawful.*

(2) *On receipt of a reference under sub-section (1), the Tribunal shall call upon the association affected by notice in writing to show cause, within thirty days from the date of the service of such notice, why the association should not be declared unlawful.*

(3) *After considering the cause, if any, shown by the association or the office-bearers or members thereof, the Tribunal shall hold an inquiry in the manner specified in section 9 and after calling for such further information as it may consider necessary from the Central Government or from any office-bearer or member of the association, it shall decide whether or not there is sufficient cause for declaring the association to be unlawful and make, as expeditiously as possible and in any case*

within a period of six months from the date of the issue of the notification under sub-section (1) of section 3, such order as it may deem fit either confirming the declaration made in the notification or cancelling the same.

(4) The order of the Tribunal made under sub-section (3) shall be published in the Official Gazette.

5. Tribunal.— *(1) The Central Government may, by notification in the Official Gazette, constitute, as and when necessary, a tribunal to be known as the “Unlawful Activities (Prevention) Tribunal” consisting of one person, to be appointed by the Central Government:*

Provided that no person shall be so appointed unless he is a Judge of a High Court.

(2) If, for any reason, a vacancy (other than a temporary absence) occurs in the office of the presiding officer of the Tribunal, then, the Central Government shall appoint another person in accordance with the provisions of this section to fill the vacancy and the proceedings may be continued before the Tribunal from the stage at which the vacancy is filled.

(3) The Central Government shall make available to the Tribunal such staff as may be necessary for the discharge of its functions under this Act.

(4) All expenses incurred in connection with the Tribunal shall be defrayed out of the Consolidated Fund of India.

(5) Subject to the provisions of section 9, the Tribunal shall have power to regulate its own procedure in all matters arising out of the discharge of its functions including the place or places at which it will hold its sittings.

(6) The Tribunal shall, for the purpose of making an inquiry under this Act, have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908), while trying a suit, in respect of the following matters, namely:—

(a) the summoning and enforcing the attendance of any witness and examining him on oath;

(b) the discovery and production of any document or other material object producible as evidence;

(c) the reception of evidence on affidavits;

(d) the requisitioning of any public record from any court or office;

(e) the issuing of any commission for the examination of witnesses.

(7) Any proceeding before the Tribunal shall be deemed to be a judicial proceeding within the meaning of sections 193 and 228 of the Indian Penal Code (45 of 1860) and the Tribunal shall be deemed to be a civil court for the purposes of section 195 and 1 [Chapter XXVI] of the Code.

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9. Procedure to be followed in the disposal of applications under this Act.—*Subject to any rules that may be made under this Act, the procedure to be followed by the Tribunal in holding any inquiry under sub-section (3) of section 4 or by a Court of the District Judge in disposing of any application under sub-section (4) of section 7 or sub-section (8) of section 8 shall, so far as may be, be the procedure laid down in the Code of Civil Procedure, 1908, for the investigation of claims and the decision of the Tribunal or the Court of the District Judge, as the case may be, shall be final.”*

Rules 3 & 5 of the Unlawful Activities (Prevention) Rules, 1968 further read as under:

“3. Tribunal and District Judge to follow rules of evidence.— (1) *In holding an inquiry under sub-section (3) of Section 4 or disposing of any application under sub-section (4) of Section 7 or sub-section (8) of Section 8, the Tribunal or the District Judge, as the case may be, shall, subject to the provisions of sub-rule (2), follow, as far as practicable, the rules of evidence laid down in the Indian Evidence Act, 1872 (1 of 1872).*

(2) *Notwithstanding anything contained in the Indian Evidence Act, 1872 (1 of 1872), where any books of account or other documents have been produced before the Tribunal or the Court of the District Judge by the Central Government and such books of account or other documents are claimed by that Government to be of a confidential nature then, the Tribunal or the Court of the District Judge, as the case may be, shall not,-*

(a) *make such books of account or other documents a part of the records of the proceedings before it; or*

(b) *allow inspection of, or grant a copy of, the whole of or any extract from, such books of account or other documents by or to any person other than a party to the proceedings before it.*

5. Documents which should accompany a reference to the Tribunal.— *Every reference made to the Tribunal under sub-section (1) of Section 4 shall be accompanied by—*

(i) *a copy of the notification made under sub-section (1) of Section 3, and*

(ii) *all the facts on which the grounds specified in the said notification are based:*

Provided that nothing in this rule shall require the Central Government to disclose any fact to the Tribunal which that Government considers against the public interest to disclose.”

Scope of Inquiry

93. Hon’ble Supreme Court of India in *Jamaat-E-Islami Hind v. Union of India* (supra) held that the declaration under sub-section (1) of Section 3 of the Act must be based on objective decision and the determination should be that any action taken by such association constitutes an unlawful activity which is the object of the association or the object is any activity punishable under Section 153-A or 153-B IPC. The observations in para 9 and 10 are apt to be noticed:

“9. Clauses (f) and (g) of Section 2 contain definitions of “unlawful activity” and “unlawful association” respectively. An “unlawful activity”, defined in clause (f), means “any action taken” of the kind specified therein and having the consequence mentioned. In other words, “any action taken” by such individual or association constituting an “unlawful activity” must have the potential specified in the definition. Determination of these facts constitutes the foundation for declaring an association to be unlawful under sub-section (1) of Section 3 of the Act. Clause (g) defines “unlawful association” with reference to “unlawful activity” in sub-clause (i) thereof, and in sub-clause (ii) the reference is to the offences punishable under Section 153-A or Section 153-B of the Penal Code, 1860. In sub-clause (ii), the objective determination is with reference to the offences punishable under Section 153-A or Section 153-B of the IPC while in sub-clause (i) it is with reference to “unlawful activity” as defined in clause (f). These definitions make it clear that the determination of the question whether any association is, or has become, an unlawful association to justify such declaration under sub-section (1) of Section 3 must be based on an objective decision; and the determination should be that “any action taken” by such association constitutes an “unlawful activity” which is the object of the association or the object is any activity punishable under Section 153-A or Section 153-B IPC. It is only on the conclusion so reached in an objective determination that a declaration can be made by the Union of India under sub-section (1) of Section 3.

10. Sub-section (2) of Section 3 requires the notification issued under sub-section (1) to specify the grounds on which it is issued and such other particulars as the Central Government may consider necessary. This requirement indicates that performance of the exercise has to be objective together with disclosure of the basis of action to the association. The proviso to sub-section (2) permits the Central Government not to disclose any fact which it considers to be against the public interest to disclose. Ordinarily a notification issued under sub-section (1) of Section 3 becomes effective only on its confirmation by the Tribunal by an order made under Section 4 after due inquiry; but in extraordinary circumstances, which require that it may be brought into effect immediately, it may be so done for "reasons to be stated in writing" by the Central Government, and then also it is subject to any order made by the Tribunal under Section 4 of the Act. Section 3 requires an objective determination of the matter by the Central Government and Section 4 requires confirmation of the act of the Central Government by the Tribunal."

94. Further, sub-section (3) of Section 4 prescribes an inquiry by the Tribunal in the manner specified after considering the reply, if any, to the show-cause notice by the respondent association. The Tribunal is also empowered to call for such other information as it may consider necessary from the Central Government or the Association in question for adjudicating whether or not there is sufficient cause for declaring the Association to be unlawful. It may be emphasized that the inquiry is in the nature of an adjudication of a *lis* between two parties, the decision of which depends upon the fate of the material produced by the respective parties and the credibility of the material. The test of greater probability is the pragmatic test applicable for determination of such an outcome.

95. The proceedings before the Tribunal are deemed to be judicial proceedings and the Tribunal is further deemed to be a Civil Court for the purpose of Section 5 of the Act for the purpose of conduct of inquiry. Subject to the provisions of Section 9, the Tribunal shall have powers to regulate its own procedure in all matters arising out of the discharge of its functions including the place or places at which the Tribunal holds its sittings. Section 9 of the Act further lays down that the procedure followed by the Tribunal in holding an inquiry under sub-section (3) of Section 4 shall be the procedure prescribed by the Code of Civil Procedure for the investigation of the claims.

Further, as per sub-rule (1) of Rule 3 of Unlawful Activities (Prevention) Rules, 1968 in holding an inquiry under sub-section (3) of Section 4 of the Act, subject to provisions of sub-rule (2), **as far as practicable**, the rules of evidence as provided in Indian Evidence Act shall be applicable.

The scope of inquiry in the context of proceedings under UA(P)A has been authoritatively laid down by the Hon'ble Apex Court in *Jamaat-E-Islami Hind v. Union of India* (supra) and observations in para 11 and 12 may be noticed:-

"11. Section 4 deals with reference to the Tribunal. Sub-section (1) requires the Central Government to refer the notification issued under sub-section (1) of Section 3 to the Tribunal "for the purpose of adjudicating whether or not there is sufficient cause for declaring the association unlawful". The purpose of making the reference to the Tribunal is an adjudication by the Tribunal of the existence of sufficient cause for making the declaration. The words 'adjudicating' and "sufficient cause" in the context are of significance. Sub-section (2) requires the Tribunal, on receipt of the reference, to call upon the association affected "by notice in writing to show cause" why the association should not be declared unlawful. This requirement would be meaningless unless there is effective notice of the basis on which the declaration is made and a reasonable opportunity to show cause against the same. Sub-section (3) prescribes an inquiry by the Tribunal, in the manner specified, after considering the cause shown to the said notice. The Tribunal may also call for such other information as it may consider necessary from the Central Government or the association to decide whether or

not there is sufficient cause for declaring the association to be unlawful. The Tribunal is required to make an order which it may deem fit “either confirming the declaration made in the notification or cancelling the same”. The nature of inquiry contemplated by the Tribunal requires it to weigh the material on which the notification under sub-section (1) of Section 3 is issued by the Central Government, the cause shown by the Association in reply to the notice issued to it and take into consideration such further information which it may call for, to decide the existence of sufficient cause for declaring the Association to be unlawful. The entire procedure contemplates an objective determination made on the basis of material placed before the Tribunal by the two sides; and the inquiry is in the nature of adjudication of a lis between two parties, the outcome of which depends on the weight of the material produced by them. Credibility of the material should, ordinarily, be capable of objective assessment. The decision to be made by the Tribunal is “whether or not there is sufficient cause for declaring the Association unlawful”. Such a determination requires the Tribunal to reach the conclusion that the material to support the declaration outweighs the material against it and the additional weight to support the declaration is sufficient to sustain it. The test of greater probability appears to be the pragmatic test applicable in the context.

12. Section 5 relates to constitution of the Tribunal and its powers. Sub-section (1) of Section 5 clearly provides that no person would be appointed “unless he is a Judge of a High Court”. Requirement of a sitting Judge of a High Court to constitute the Tribunal also suggests that the function is judicial in nature. Sub-section (7) says that any proceeding before the Tribunal shall be deemed to be a “judicial proceeding” and the Tribunal shall be deemed to be a “Civil Court” for the purposes specified. Section 6 deals with the period of operation and cancellation of notification. Section 8 has some significance in this context. Sub-section (8) of Section 8 provides the remedy to any person aggrieved by a notification issued in respect of a place under sub-section (1) or by an order made under sub-section (3) or sub-section 4, by an application made to the District Judge who is required to decide the same after giving the parties an opportunity of being heard. This also indicates the judicial character of the proceeding even under Section 8. Section 9 prescribes the procedure to be followed in the disposal of applications under the Act. Provisions of Section 9 of the Act lay down that the procedure to be followed by the Tribunal in holding an inquiry under sub-section (3) of Section 4 or by the District Judge under Section 8 shall, so far as may be, be the procedure prescribed by the Code of Civil Procedure for the investigation of claims. Sections 10 to 14 in Chapter III relate to “offences and penalties” which indicate the drastic consequences of the action taken under the Act including a declaration made that an association is unlawful. The penal consequences provided are another reason to support the view that the inquiry contemplated by the Tribunal under Section 4 of the Act is judicial in character since the adjudication made by the Tribunal is visited with such drastic consequences.”

IX. ADMISSIBILITY AND RELEVANCY OF EVIDENCE

96. For the purpose of assessment of evidence in the proceedings before this Tribunal, reference may be made to Sections 25, 26 & 27 Indian Evidence Act, 1872 (corresponding to Section 23 of Bharatiya Sakshya Adhiniyam, 2023), Section 161 and 162 of Cr.P.C., 1973 (corresponding to Sections 180 & 181 of Bharatiya Nagrik Suraksha Sanhita, 2023) and legal principles as settled by the Hon’ble Supreme Court with reference to aforesaid sections. Section 25, 26 and 27 of the Indian Evidence Act, 1872 may be reproduced for reference as under:-

“25. Confession to police-officer not to be proved.—No confession made to a police-officer, shall be proved as against a person accused of any offence.

26. Confession by accused while in custody of police not to be proved against him.—No confession made by any person whilst he is in the custody of a police-officer, unless it be made in the immediate presence of a Magistrate, shall be proved as against such person.

[Explanation.—In this section “Magistrate” does not include the head of a village discharging magisterial functions in the Presidency of Fort St. George⁶ *** or elsewhere, unless

such headman is a Magistrate exercising the powers of a Magistrate under the Code of Criminal Procedure, 1882 (10 of 1882).]

27. How much of information received from accused may be proved.—*Provided that, when any fact is deposed to as discovered in consequence of information received from a person accused of any offence, in the custody of a police-officer, so much of such information, whether it amounts to a confession or not, as relates distinctly to the fact thereby discovered, may be proved.”*

Further, Section 161 and 162 Cr.P.C., 1973 read as under:-

161. Examination of witnesses by police. (1) *Any police officer making an investigation under this Chapter, or any police officer not below such rank as the State Government may, by general or special order, prescribe in this behalf, acting on the requisition of such officer, may examine orally any person supposed to be acquainted with the facts and circumstances of the case.*

(2) *Such person shall be bound to answer truly all questions relating to such case put to him by such officer, other than questions the answers to which would have a tendency to expose him to a criminal charge or to a penalty or forfeiture.*

(3) *The police officer may reduce into writing any statement made to him in the course of an examination under this section; and if he does so, he shall make a separate and true record of the statement of each such person whose statement he records.*

162. Statements to police not to be signed: *Use of statements in evidence. (1) No statement made by any person to a police officer in the course of an investigation under this Chapter, shall, if reduced to writing, be signed by the person making it ; nor shall any such statement or any record thereof, whether in a police diary or otherwise, or any part of such statement or record, be used for any purpose, save as hereinafter*

provided, at any inquiry or trial in respect of any offence under investigation at the time when such statement was made:

Provided that when any witness is called for the prosecution in such inquiry or trial whose statement has been reduced into writing as aforesaid, any part of his statement, if duly proved, may be used by the accused, and with the permission of the Court, by the prosecution, to contradict such witness in the manner provided by section 145 of the Indian Evidence Act, 1872 (1 of 1872); and when any part of such statement is so used, any part thereof may also be used in the re-examination of such witness, but for the purpose only of explaining any matter referred to in his cross-examination.

(2) *Nothing in this section shall be deemed to apply to any statement falling within the provisions of clause (1) of section 32 of the Indian Evidence Act, 1872 (1 of 1872), or to affect the provisions of section 27 of that Act.*

Explanation.-An omission to state a fact or circumstance in the statement referred to in sub-section (1) may amount to contradiction if the same appears to be significant and otherwise relevant having regard to the context in which such omission occurs and whether any omission amounts to a contradiction in the particular context shall be a question of fact.”

97. Section 25 and 26 of the Indian Evidence Act, 1872 provide that a confession made to a Police Officer while in custody shall not be proved against a person accused of any offence in a trial of the accused for the said offence but the same does not bar the use of a statement given by the accused in a proceeding other than in which he is being tried for the said offence.

98. Hon'ble Supreme Court of India in *Mahesh Kumar v. State of Rajasthan, 1990 Supp SCC 541 (2)* held that the statement made by the accused to the IO may be inadmissible in the trial for the said offence

which was under investigation but is admissible in an enquiry with regard to the ownership of the property held under Criminal Procedure Code. Relevant observations in para 3 may be reproduced as under:-

“3. In Queen Empress v. Tribhovan Manekchand, a Division Bench of the Bombay High Court laid down that the statement made to the police by the accused persons as to the ownership of property which was the subject matter of the proceedings against them although inadmissible as evidence against them at the trial for the offence with which they were charged, were admissible as evidence with regard to the ownership of the property in an enquiry held by the Criminal Procedure Code. The same view was reiterated in Pohlu v. Emperor where it was pointed out that though there is a bar in Section 25 of the Evidence Act, or in Section 162 Cr.P.C. for being made use of as evidence against the accused, this statement could be made use of in an enquiry under Section 517 Cr.P.C. when determining the question of return of property. These two decisions have been followed by the Rajasthan High Court in Dhanraj Baldeokishan v. State and the Mysore High Court in Veerabhadrapa v. Govinda.”

Further, the Hon’ble Apex Court in *Khatri (IV) v. State of Bihar, (1981) 2 SCC 493*, with reference to statement made by an accused before a Police Officer in the course of investigation, held that the bar under Section 162 Cr.P.C. would not apply where the Court calls for such statement in civil proceedings or inquiry other than which was under investigation, provided the statement is otherwise relevant under the Indian Evidence Act, 1872. Relevant observations in para 3 may be beneficially noticed:-

“3. Before we refer to the provisions of Sections 162 and 172 of the Criminal Procedure Code, it would be convenient to set out briefly a few relevant provisions of that Code. Section 2 is the definition section and clause (g) of that section defines “inquiry” to mean “every inquiry, other than a trial conducted under this Code by a Magistrate or court”. Clause (a) of Section 2 gives the definition of “investigation” and it says that investigation includes “all the proceedings under this Code for the collection of evidence conducted by a police officer or by any person (other than a Magistrate) who is authorised by a Magistrate in this behalf”. Section 4 provides:

“4. (1) All offences under the Penal Code, 1860 shall be investigated, inquired into, tried, and otherwise dealt with according to the provisions hereinafter contained.

(2) All offences under any other law shall be investigated, inquired into, tried, and otherwise dealt with according to the same provisions, but subject to any enactment for the time being in force regulating the manner or place of investigating, inquiring into, trying or otherwise dealing with such offences.”

It is apparent from this section that the provisions of the Criminal Procedure Code are applicable where an offence under the Penal Code, 1860 or under any other law is being investigated, inquired into, tried or otherwise dealt with. Then we come straight to Section 162 which occurs in Chapter XII dealing with the powers of the police to investigate into offences. That section, so far as material, reads as under:

“162. (1) No statement made by any person to a police officer in the course of an investigation under this Chapter, shall, if reduced to writing, be signed by the person making it; nor shall any such statement or any record thereof, whether in a police diary or otherwise, or any part of such statement or record, be used for any purpose, save as hereinafter provided, at any inquiry or trial in respect of any offence under investigation at the time when such statement was made:

Provided that when any witness is called for the prosecution in such inquiry or trial whose statement has been reduced into writing as aforesaid, any part of his statement, if duly proved, may be used by the accused, and with the permission of the court, by the prosecution, to contradict such witness in the manner provided by Section 145 of the Indian Evidence Act, 1872; and when any part of such statement is so used, any part thereof may also be used in the re-examination of such witness, but for the purpose only of explaining any matter referred to in his cross-examination.

(2) Nothing in this section shall be deemed to apply to any statement falling within the provisions of clause (1) of Section 32 of the Indian Evidence Act, 1872, or to affect the provisions of Section 27 of that Act.”

It bars the use of any statement made before a police officer in the course of an investigation under Chapter XII, whether recorded in a police diary or otherwise, but, by the express terms of the section, this bar is applicable only where such statement is sought to be used “at any inquiry or trial in respect of any offence under investigation at the time when such statement was made”. If the statement made before a police officer in the course of an investigation under Chapter XII is sought to be used in any proceeding other than an inquiry or trial or even at an inquiry or trial but in respect of an offence other than that which was under investigation at the time when such statement was made, the bar of Section 162 would not be attracted. This section has been enacted for the benefit of the accused, as pointed out by this Court in Tahsildar Singh v. State of U.P. It is intended “to protect the accused against the user of statements of witnesses made before the police during investigation, at the trial presumably on the assumption that the said statements were not made under circumstances inspiring confidence”. This Court, in Tahsildar Singh case approved the following observations of Braund, J. in Emperor v. Aftab Mohd. Khan:

“As it seems to us it is to protect accused persons from being prejudiced by statements made to police officers who by reason of the fact that an investigation is known to be on foot at the time the statement is made, may be in a position to influence the maker of it, and, on the other hand, to protect accused persons from the prejudice at the hands of persons who in the knowledge that an investigation has already started, are prepared to tell untruths”

and expressed its agreement with the view taken by the Division Bench of the Nagpur High Court in Baliram Tikaram Marathe v. Emperor that “the object of the section is to protect the accused both against overzealous police officers and untruthful witnesses”. Protection against the use of statement made before the police during investigation is, therefore, granted to the accused by providing that such statement shall not be allowed to be used except for the limited purpose set out in the proviso to the section, at any inquiry or trial in respect of the offence which was under investigation at the time when such statement was made. But this protection is unnecessary in any proceeding other than an inquiry or trial in respect of the offence under investigation and hence the bar created by the section is a limited bar. It has no application, for example in a civil proceeding or in a proceeding under Article 32 or 226 of the Constitution and a statement made before a police officer in the course of investigation can be used as evidence in such proceeding, provided it is otherwise relevant under the Indian Evidence Act. There are a number of decisions of various High Courts which have taken this view and amongst them may be mentioned the decision of Jaganmohan Reddy, J. in Malakala Surya Rao v. G. Janakamma. The present proceeding before us is a writ petition under Article 32 of the Constitution filed by the petitioners for enforcing their Fundamental Rights under Article 21 and it is neither an “inquiry” nor a “trial” in respect of any offence and hence it is difficult to see how Section 162 can be invoked by the State in the present case. The procedure to be followed in a writ petition under Article 32 of the Constitution is prescribed in Order XXXV of the Supreme Court Rules, 1966, and sub-rule (9) of Rule 10 lays down that at the hearing of the rule nisi, if the court is of the opinion that an opportunity be given to the parties to establish their respective cases by leading further evidence, the court may take such evidence or cause such evidence to be taken in such manner as it may deem fit and proper and obviously the reception of such evidence will be governed by the provisions of the Indian Evidence Act. It is obvious, therefore, that even a statement made before, a police officer during investigation can be produced and used in evidence in a writ petition under Article 32 provided it is relevant under the Indian Evidence Act and Section 162 cannot be urged as a bar against its production or use. The reports submitted by Shri L.V. Singh setting forth the result of his investigation cannot, in the circumstances, be shut out from being produced and considered in evidence under Section 162, even if they refer to any statements made before him and his associates during investigation, provided they are otherwise relevant under some provision of the Indian Evidence Act.”

99. In *Vinay D. Nagar v. State of Rajasthan*, (2008) 5 SCC 597, Hon'ble Supreme Court of India reiterated the observations in *Khatri (IV) v. State of Bihar* (supra), as observed in para 14 & 15 as under:-

“14. On account of Section 162 CrPC, a statement made by any person to a police officer in the course of investigation under Chapter XII, if reduced into writing, will not be signed by the person making it, nor such statement recorded or any part thereof be used for any purpose at any inquiry or trial in respect of any offence under investigation at the time when such statement was made. Such statement may be used by an accused and with the permission of the court by the prosecution to contradict the witness whose statement was recorded by the police in the manner provided under Section 145 of the Evidence Act and can also be used for re-examination of such witness for the purpose only of explaining any matter referred to in his cross-examination. Bar of Section 162 CrPC of proving the statement recorded by the police officer of any person during investigation however shall not apply to any statement falling within the provision of Clause (1) of Section 32 of the Evidence Act, nor shall it affect Section 27 of the Evidence Act. Bar of Section 162 CrPC is in regard to the admissibility of the statement recorded of a person by the police officer under Section 161 CrPC and by virtue of Section 162 CrPC would be applicable only where such statement is sought to be used at any inquiry or trial in respect of any offence under investigation at the time when such statement was made.

15. In Khatri (IV) v. State of Bihar this Court has held that Section 162 CrPC bars the use of any statement made before the police officer in the course of an investigation under Chapter XII, whether recorded in the police diary or otherwise. However, by the express terms of Section 162, this bar is applicable only where such statement is sought to be used “at any inquiry or trial” in respect of any offence under investigation at the time when such statement was made. If the statement made before a police officer in the course of an investigation under Chapter XII is sought to be used in any proceeding, inquiry or trial in respect of an offence other than which was under investigation at the time when such statement was made, the bar of Section 162 will not be attracted.”

100. In the aforesaid context, observations made by Hon'ble Supreme Court in para 21 and 22 in *Jamaat-e-Islami Hind v. Union of India* (supra) may also be noticed:-

“21. To satisfy the minimum requirements of a proper adjudication, it is necessary that the Tribunal should have the means to ascertain the credibility of conflicting evidence relating to the points in controversy. Unless such a means is available to the Tribunal to determine the credibility of the material before it, it cannot choose between conflicting material and decide which one to prefer and accept. In such a situation, the only option to it would be to accept the opinion of the Central Government, without any means to test the credibility of the material on which it is based. The adjudication made would cease to be an objective determination and be meaningless, equating the process with mere acceptance of the ipse dixit of the Central Government. The requirement of adjudication by the Tribunal contemplated under the Act does not permit abdication of its function by the Tribunal to the Central Government providing merely its stamp of approval to the opinion of the Central Government. The procedure to be followed by the Tribunal must, therefore, be such which enables the Tribunal to itself assess the credibility of conflicting material on any point in controversy and evolve a process by which it can decide whether to accept the version of the Central Government or to reject it in the light of the other view asserted by the association. The difficulty in this sphere is likely to arise in relation to the evidence or material in respect of which the Central Government claims non-disclosure on the ground of public interest.

22. It is obvious that the unlawful activities of an association may quite often be clandestine in nature and, therefore, the source of evidence of the unlawful activities may require continued confidentiality in public interest. In such a situation, disclosure of the source of such information, and, may be, also full particulars thereof, is likely to be against the public interest. The scheme of the Act and the procedure for inquiry indicated by the Rules framed thereunder provide for maintenance of confidentiality, whenever required in public interest. However, the non-disclosure of sensitive information and evidence to the association and its office-bearers, whenever justified in public interest, does not necessarily imply its non-disclosure to the Tribunal as well. In such cases where

the Tribunal is satisfied that non-disclosure of such information to the association or its office-bearers is in public interest, it may permit its non-disclosure to the association or its office-bearers, but in order to perform its task of adjudication as required by the Act, the Tribunal can look into the same for the purpose of assessing the credibility of the information and satisfying itself that it can safely act on the same. In such a situation, the Tribunal can devise a suitable procedure whereby it can itself examine and test the credibility of such material before it decides to accept the same for determining the existence of sufficient cause for declaring the association to be unlawful. The materials need not be confined only to legal evidence in the strict sense. Such a procedure would ensure that the decision of the Tribunal is an adjudication made on the points in controversy after assessing the credibility of the material it has chosen to accept, without abdicating its function by merely acting on the ipse dixit of the Central Government. Such a course would satisfy the minimum requirement of natural justice tailored to suit the circumstances of each case, while protecting the rights of the association and its members, without jeopardising the public interest. This would also ensure that the process of adjudication is not denuded of its content and the decision ultimately rendered by the Tribunal is reached by it on all points in controversy after adjudication and not by mere acceptance of the opinion already formed by the Central Government.”

101. In the light of aforesaid legal position, since the inquiry before this Tribunal does not entail adjudicating the guilt of the accused but rather assessing the adequacy of material before the Central Government for declaring Sikhs for Justice (SFJ) as an ‘unlawful association’, the statements of witnesses recorded by the police officers including the statements made by the accused during investigation of said offences along with seizure memos are relevant and admissible before this Tribunal. The same can be looked into to ascertain the sufficiency of material before the Central Government for making the declaration under section 3(1) of UA(P)A.

X. CONFIDENTIALITY OF DOCUMENTS CLAIMED ON BEHALF OF UNION OF INDIA

102. An application under Section 129 of the Bharatiya Sakshya Adhiniyam, 2023 read with Section 3(2) of the Unlawful Activities (Prevention) Act, 1967 and Rule 3(2) and Rule 5 of the Unlawful Activities (Prevention) Rules, 1968 has been preferred on behalf of Ministry of Home Affairs (Central Government) claiming privilege of non-disclosure of documents (adduced in a sealed cover) in national interest, as mentioned in affidavit of evidence of Shri Anil Subramaniam, Joint Secretary, Ministry of Home Affairs (Internal Security Division), Government of India who has been examined as PW-52.

Learned ASG urged that appropriate directions be issued by the Tribunal directing that said documents shall not be shared with any third party or any member or office bearer of SFJ and shall not be made available for publication in public domain by any person and/or for inspection to any party during the pendency of proceedings and after conclusion thereof.

103. Directions were issued by the Tribunal *vide* order dated 13th December, 2024 that the aforesaid documents shall not be shared, as prayed therein, till the disposal of the application, which shall be considered/disposed of along with the main matter.

104. Learned ASG emphasizes that the documents for which claim of privilege is made is by their nature, confidential and sensitive. Further, the said documents in sealed cover cannot be supplied as a public

document since the documents form part of the evidence collected by the Intelligence Agencies which pertain to secessionist and unlawful activities of SFJ and disclosure would be clearly detrimental to the larger public interest as well as security of the State.

105. In the aforesaid context, learned ASG relied upon Section 123 of the Indian Evidence Act along with Rule 3(2) of the Unlawful Activities (Prevention) Rules, 1968. Reference was further made to Section 129 of the Bharatiya Sakshya Adhiniyam, 2023. Reliance was also placed upon para 20 and 22 of *Jamaat-E-Islami Hind v. Union of India* (supra).

106. Admittedly, the material filed by the Central Government in the sealed cover contains confidential notes and the file was put up to the Cabinet Committee on Security along with relevant documents including intelligence inputs and correspondence in relation thereto. The privilege, as such, is claimed not only in public interest also in national interest, since the nature of the documents impinge upon the national security.

107. What is in the interest of national security is not a question of law but a matter of policy. In *Ex-Armyemen's Protection Services Private Ltd. v. Union of India, (2014) 5 SCC 409*, Hon'ble Apex Court observed that it is difficult to define in exact terms as to what is national security. However, the same would generally include socio-political stability, territorial integrity, economic solidarity and strength, ecological balance, cultural cohesiveness, external peace etc. It is not for the Court to decide whether something is in the interest of the State or not but should be left to the Executive.

108. For the purpose of claiming the privilege to the documents, reference may also be made to Section 129 of the Bharatiya Sakshya Adhiniyam, 2023 read with Section 3(2) of the Unlawful Activities (Prevention) Act, 1967 and Rule 3(2) of the Unlawful Activities (Prevention) Rules, 1968.

"THE BHARATIYA SAKSHYA ADHINIYAM, 2023

"S.129. Evidence as to affairs of State.— No one shall be permitted to give any evidence derived from unpublished official records relating to any affairs of State, except with the permission of the officer at the head of the department concerned, who shall give or withhold such permission as he thinks fit."

THE UNLAWFUL ACTIVITIES (PREVENTION) ACT, 1967

3. Declaration of an association as unlawful.—

(1) *****

(2) Every such notification shall specify the grounds on which it is issued and such other particulars as the Central Government may consider necessary:

Provided that nothing in this sub-section shall require the Central Government to disclose any fact which it considers to be against the public interest to disclose.

***"

THE UNLAWFUL ACTIVITIES (PREVENTION) RULES, 1968

3. Tribunal and District Judge to follow rules of evidence.— (1) In holding an inquiry under sub-section (3) of section 4 or disposing of any application under sub-section (4) of section 7 or sub-section (8) of section 8, the Tribunal or the District Judge, as the case may be, shall, subject to the provisions of sub-rule (2), follow, as far as practicable, the rules of evidence laid down in the Indian Evidence Act, 1872 (1 of 1872).

[(2) Notwithstanding anything contained in the Indian Evidence Act, 1872 (1 of 1872), where any books of account or other documents have been produced before the Tribunal or the Court of the District Judge by the Central Government and such books of account or other documents are claimed by that Government to be of a confidential nature then, the Tribunal or the Court of the District Judge, as the case may be, shall not,-

- (a) make such books of account or other documents a part of the records of the proceedings before it; or
 (b) allow inspection of, or grant a copy of, the whole of or any extract from, such books of account or other documents by or to any person other than a party to the proceedings before it.]”

109. Proviso to sub-section (2) of Section 3 of UA(P)A provides that the Central Government may not disclose any fact which it considers to be against public interest to disclose. In the aforesaid context, it may be noticed that Rule 3(2) of the Unlawful Activities (Prevention) Rules, 1968 starts with a non-obstante clause and provides that notwithstanding anything contained in the Indian Evidence Act, 1872, where any books of account or other documents are sought to be produced by the Central Government and these documents are claimed to be of a confidential nature, then the Tribunal shall not make such documents a part of the records of the proceedings before it or allow inspection of or grant a copy of the same to any person other than the parties to the proceedings before it.

110. The nature of the proceedings and the scope of inquiry before the Tribunal and the treatment which has to be given to the documents in respect of which privilege has been claimed by the government or its Nodal Agency has been further highlighted by the Hon’ble Supreme Court of India in *Jamaat-e-Islami Hind v. Union of India* (supra). After interpreting the scheme of UA(P)A and the Rules framed thereunder, the Hon’ble Apex Court unequivocally upheld the rights of the Central Government to claim privilege in respect of confidential documents in public interest. Observations in para 20, 22, 23 and 26 in *Jamaat-e-Islami Hind v. Union of India* (supra) may be quoted for reference:

“20. As earlier mentioned, the requirement of specifying the grounds together with the disclosure of the facts on which they are based and an adjudication of the existence of sufficient cause for declaring the association to be unlawful in the form of decision after considering the cause, if any, shown by the association in response to the show-cause notice issued to it, are all consistent only with an objective determination of the points in controversy in a judicial scrutiny conducted by a Tribunal constituted by a sitting High Court Judge, which distinguishes the scheme under this Act with the requirement under the preventive detention laws to justify the anticipatory action of preventive detention based on suspicion reached by a process of subjective satisfaction. The scheme under this Act requiring adjudication of the controversy in this manner makes it implicit that the minimum requirement of natural justice must be satisfied, to make the adjudication meaningful. No doubt, the requirement of natural justice in a case of this kind must be tailored to safeguard public interest which must always outweigh every lesser interest. This is also evident from the fact that the proviso to sub-section (2) of Section 3 of the Act itself permits the Central Government to withhold the disclosure of facts which it considers to be against the public interest to disclose. Similarly, Rule 3(2) and the proviso to Rule 5 of the Unlawful Activities (Prevention) Rules, 1968 also permit non-disclosure of confidential documents and information which the Government considers against the public interest to disclose. Thus, subject to the non-disclosure of information which the Central Government considers to be against the public interest to disclose, all information and evidence relied on by the Central Government to support the declaration made by it of an association to be unlawful, has to be disclosed to the association to enable it to show cause against the same. Rule 3 also indicates that as far as practicable the rules of evidence laid down in the Indian Evidence Act, 1872 must be followed. A departure has to be made only when the public interest so requires. Thus, subject to the requirement of public interest which must undoubtedly outweigh the interest of the association and its members, the ordinary rules of evidence and requirement of natural justice must be followed by the Tribunal in making the adjudication under the Act.

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22. It is obvious that the unlawful activities of an association may quite often be clandestine in nature and, therefore, the source of evidence of the unlawful activities may require continued confidentiality in public interest. In such a situation, disclosure of the source of such information, and, may be, also full particulars thereof, is likely to be against the public interest. The scheme of the Act and the procedure for inquiry indicated by the Rules framed thereunder provide for maintenance of confidentiality, whenever required in public interest. However, the non-disclosure of sensitive information and evidence to the association and its office-bearers, whenever justified in public interest, does not necessarily imply its non-disclosure to the Tribunal as well. In such cases where the Tribunal is satisfied that non-disclosure of such information to the association or its office-bearers is in public interest, it may permit its non-disclosure to the association or its office-bearers, but in order to perform its task of adjudication as required by the Act, the Tribunal can look into the same for the purpose of assessing the credibility of the information and satisfying itself that it can safely act on the same. In such a situation, the Tribunal can devise a suitable procedure whereby it can itself examine and test the credibility of such material before it decides to accept the same for determining the existence of sufficient cause for declaring the association to be unlawful. The materials need not be confined only to legal evidence in the strict sense. Such a procedure would ensure that the decision of the Tribunal is an adjudication made on the points in controversy after assessing the credibility of the material it has chosen to accept, without abdicating its function by merely acting on the ipse dixit of the Central Government. Such a course would satisfy the minimum requirement of natural justice tailored to suit the circumstances of each case, while protecting the rights of the association and its members, without jeopardising the public interest. This would also ensure that the process of adjudication is not denuded of its content and the decision ultimately rendered by the Tribunal is reached by it on all points in controversy after adjudication and not by mere acceptance of the opinion already formed by the Central Government.

23. In *John J. Morrissey and G. Donald Booher v. Lou B. Brewer* [408 US 471: 33 L Ed 2d 484 (1972)] the United States Supreme Court, in a case of parole revocation, indicated the minimum requirements to be followed, as under: (L Ed pp. 498-99)

“Our task is limited to deciding the minimum requirements of due process. They include (a) written notice of the claimed violations of parole; (b) disclosure to the parolee of evidence against him; (c) opportunity to be heard in person and to present witnesses and documentary evidence; (d) the right to confront and cross-examine adverse witnesses (unless the hearing officer specifically finds good cause for not allowing confrontation); (e) a ‘neutral and detached’ hearing body such as a traditional parole board, members of which need not be judicial officers or lawyers; and (f) a written statement by the fact finders as to the evidence relied on and reasons for revoking parole. We emphasise there is no thought to equate this second stage of parole revocation to a criminal prosecution in any sense. It is a narrow inquiry; the process should be flexible enough to consider evidence including letters, affidavits, and other material that would not be admissible in an adversary criminal trial.”

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26.The provision for adjudication by judicial scrutiny, after a show-cause notice, of existence of sufficient cause to justify the declaration must necessarily imply and import into the inquiry, the minimum requirement of natural justice to ensure that the decision of the Tribunal is its own opinion, formed on the entire available material, and not a mere imprimatur of the Tribunal affixed to the opinion of the Central Government. Judicial scrutiny implies a fair procedure to prevent the vitiating element of arbitrariness. What is the fair procedure in a given case, would depend on the materials constituting the factual foundation of the notification and the manner in which the Tribunal can assess its true worth. This has to be determined by the Tribunal keeping in view the nature of its scrutiny, the minimum requirement of natural justice, the fact that the materials in such matters are not confined to legal evidence in the strict sense, and that the scrutiny is not a criminal trial. The Tribunal should form its opinion on all the points in controversy after assessing for itself the credibility of the material relating to it, even though it may not be disclosed to the association, if the public interest so requires.”

111. In the aforesaid context, it may be noticed that Cabinet papers, minutes of discussion of Heads of Department and high level documents relating to the inner working of the government machinery or

concerned with framing of government policies belong to classified category of documents, which in public interest may be regarded as protected against disclosure as held in *S.P. Gupta v. Union of India, 1981 (Suppl.) SCC 87*.

112. The application claiming privilege filed on behalf of Union of India is duly supported by an affidavit of Shri Anil Subramaniam, Joint Secretary, Ministry of Home Affairs (Internal Security Division), Government of India. The documents placed in the sealed cover were opened and examined by the Tribunal in relation to the evidence brought on record by the witnesses. In the opinion of this Tribunal, the documents placed in the sealed cover corroborate the substantive testimony of witnesses which has been led on record by the Union of India and can be taken into consideration.

After perusal of the said documents, this Tribunal is of the considered opinion that the documents collected by the Intelligence Agencies pertaining to secessionist and unlawful activities of SFJ and those associated with it, are sensitive and confidential in nature. The disclosure of the same to SFJ or any third party shall be prejudicial to public interest as well as security of the State. The non-provision of the said documents contained in the sealed cover is in no manner, fatal to the Association or any other person. The privilege claimed on behalf of the Union of India in respect of the said documents in a sealed cover is allowed. Accordingly, it is directed that said documents shall not be shared with any third party or any member or office bearer of SFJ (respondent association) and shall not be made available for publication in public domain by any person and/or for inspection to any party during the pendency of proceedings and after conclusion thereof.

XI. ANALYSIS

113. I have considered the submissions made by learned Additional Solicitor General along with Shri Rajat Nair, Advocate on behalf of Union of India and gone through the evidence along with material placed on record. The documents placed in a sealed cover during the evidence of PW-52 have also been perused.

114. The Tribunal is required to adjudicate whether or not there is sufficient cause for extending the declaration of Sikhs for Justice (SFJ) as an “unlawful association”, in view of extension of declaration of Sikhs for Justice as an “unlawful association” for a period of five years from 10th day of July, 2024 by the Central Government *vide* notification No.2660(E) dated 08th July, 2024, in exercise of powers conferred by sub-section (1) and (3) of Section 3 of the Unlawful Activities (Prevention) Act, 1967.

115. In the light of the legal principles which have been enumerated in the preceding paras, the test of “subjective satisfaction based on objective consideration of the material” is applicable when the Union of India arrives at an administrative decision as to whether an association is liable to be declared as “unlawful association” under the provisions of UA(P)A.

To satisfy the said test, it is incumbent that there should be material available before the Union of India which would form part of the official record and should not be extraneous to the aims, objects and

activities of the association sought to be declared as “unlawful”. Once there is availability of incriminatory and inculpatory material on the file placed before the Competent Authority of Union of India, manifesting that the association sought to be declared as unlawful is indulging in secessionist and subversive activities, the same will muster and satisfy the test of “sufficient cause” as contemplated in *Jamaat-E-Islami Hind v. Union of India* (supra).

The statute does not prescribe any minimum number of criminal acts to be available before the Union of India before it takes a decision to proscribe an organization under Section 3 of UA(P)A. Section 3 of UA(P)A emphasizes on the word “opinion” and not any numerical figure or other ingredient before the Union of India can make a decision under Section 3(1) of UA(P)A.

As already noticed, Hon'ble Supreme Court in *Jamaat-E-Islami Hind v. Union of India* (supra) has prescribed “test of greater probability” which has to be applied to arrive at a conclusion as to whether there is sufficient cause to declare an organization as “unlawful association”.

116. On the face of record, there has been an exponential increase in the registration of FIRs against SFJ and its chief protagonist Gurpatwant Singh Pannun from 11 in 2019 to 122 in 2024, in relation with secessionist activities undertaken by the association.

117. Considering the active role played by Gurpatwant Singh Pannun in promoting separatist and anti-India activities advocating creation of an independent State of Khalistan, he was declared a ‘terrorist’ by the Union of India under the Unlawful Activities (Prevention) Act, 1967 {UA(P)A} vide notification No.S.O.2170(E) dated 01st July, 2020. Accordingly, in exercise of powers conferred by Clause (u) of sub-section (1) of Section 35 of UA(P)A, the Union of India made the amendment in Fourth Schedule to the said Act whereby after Serial No.10 in relation to entries therein, the name of Gurpatwant Singh Pannun was added and the judicial notice of the same can be taken on record.

118. In the aforesaid context, linkage of Gurpatwant Singh Pannun with other Khalistani based terrorist organizations has also been brought on record. Vide notification No.S.O.2169(E) dated 01st July, 2020 Gurmeet Singh Bagga (relating to Khalistan Zindabad Force); S.O.2166(E) dated 01st July, 2020 Ranjeet Singh (relating to Khalistan Zindabad Force); S.O.2171(E) dated 01st July, 2020 Hardeep Singh Nijjar (operational head of Khalistan Tiger Force); S.O.2168(E) dated 01st July, 2020 Bhupinder Singh Bhinda; S.O.2164(E) dated 01st July, 2020 Wadhawa Singh Babbar @ Chacha @ Babbar (relating to Babbar Khalsa team); S.O.2165(E) dated 01st July, 2020 Lakhbir Singh Rode; S.O.2167(E) dated 01st July, 2024 Paramjit Singh Panjwar (relating to Khalistan Commando Force-Panjwar); S.O. 2172(E) dated 01st July, 2020 Paramjit Singh Pamma (Babbar Khalsa International ‘BKI’) were declared as terrorists.

119. The evidence of the witnesses examined on behalf of Union of India reflecting the anti-national and subversive activities of Sikhs for Justice through its chief protagonist Gurpatwant Singh Pannun and other associates, may be briefly discussed hereinafter.

120. RC-22/2022/NIA/DLI dated 18.05.2022 reflects SFJ's involvement in use of improvised explosive device behind the wall of Burail Jail, Chandigarh, as revealed in deposition of PW-20 Shri Sourabh Bhardwaj, Deputy Superintendent of Police, NIA, Delhi. The case relates to recovery of tiffin like objet resembling an IED, a detonator like device and a black bag near the back wall of Burail Jail, Chandigarh in April, 2022. A search conducted at the houses of associates of Jaswinder Singh Multani revealed that they were linked to the accused through WhatsApp groups such as 'Sikhs for Justice, Referendum 2020 and Khalistan Ki Jung'. The Facebook account of accused Jaswinder Singh Multani, also revealed that he used to share anti-national and secessionist posts on his Facebook profile and additionally provided training on how to operate hand grenades and pistols to members of his group through video calls. Jaswinder Singh Multani stands declared as Proclaimed Offender and the investigation in the case is still undergoing.

121. (i) Testimony of PW-20 Shri Sourabh Bhardwaj, Deputy Superintendent of Police, NIA, Delhi in RC-35/2021/NIA/DLI dated 30.12.2021 reflects that aforesaid FIR was registered since Jaswinder Singh Multani, a member of SFJ along with associates based in India and abroad was actively recruiting and radicalizing youth in Punjab through social media and encrypted messaging platforms. Further, their agenda is to secede Punjab from India for which they have been raising funds and using smuggling networks to procure arms, ammunition and explosives to carry out terror activities and revive terrorism in Punjab. During investigation, searches were conducted at different locations in Punjab and Delhi of the suspected associates which revealed that members and leaders of SFJ and Khalistani associations were involved in unlawful activities. Accordingly, warrant of arrests were issued by Special NIA Court against members of Sikhs for Justice including Gurmeet Singh, Paramjeet Singh Pamma, Ranjeet Singh Neeta and Jaswinder Singh Multani but no arrests could be made and the case is under investigation.

(ii) PW-18 Ms. Preetinder Kaur Virk, Deputy Superintendent of Police, NIA, Chandigarh with reference to RC-19/2020/NIA/DLI dated 05.04.2020 stated that the aforesaid FIR pertains to propagation of secessionist "Khalistan Referendum 2020" movement by affixing posters and banners of Khalistan Zindabad and Referendum 2020, procurement of weapons, setting fire to business installations, efforts for arms training in Pakistan and other acts of violence in Punjab and other parts of India. In the said case, Amritsar Police apprehended Sukhraj Singh @ Raju and Malkit Singh @ Meetu on the spot at Kotmit Singh Flyover, Amritsar while they were hanging "Khalistan Zindabad" and "Khalistan Referendum 2020" cloth banners at pillars of flyover on 19.10.2018. During the course of investigation, other co-accused were arrested and investigation established that they received funds from abroad sent by members for Sikhs for Justice which were used for furthering terror activities and other preparatory acts. The videos and photographs of Gurpatwant Singh Pannun were downloaded from open source, which revealed that SFJ is a front organization for terrorist groups whose leaders are affiliated and associated with SFJ. The investigation revealed that members of SFJ had been recruiting Sikh youth through social media and instigating them to carry out illegal activities against the Government of India. During investigation, an attempt was also made to threaten NIA officials engaged in investigation through twitter handles. In the aforesaid context, Gurpatwant Singh Pannun released a letter

dated 25.06.2019 written by him to Mr. Michael Pompeo, the then US Secretary of State admitting that arrested accused were SFJ's campaigners in India. Chargesheet in the said case stands filed before NIA Special Court, SAS Nagar, Mohali against ten accused including Gurpatwant Singh Pannun. The evidence in the said case strengthens the fact that SFJ has active linkages in Pakistan and have forged a nexus to undermine the territorial integrity and sovereignty of India. The charge against the accused also stands framed in the said case and order dated 14.09.2023 has also been passed by Special NIA Judge whereby properties in the name of Gurpatwant Singh Pannun have been directed to be confiscated.

122. Call made by Gurpatwant Singh Pannun on social media to incite mutiny in Indian Army and engineer balkanisation of India

(i) As testified by PW-3 RC No. 12/2021/NIA/DLI dated 18.06.2021 reflects that aforesaid case was registered since Sikh for Justice (SFJ) uploaded a video on social media platform in which the Chief cum General Counsel of SFJ, Gurpatwant Singh Pannun, can be seen provoking and instigating the soldiers of Indian Army hailing from the States of Punjab, West Bengal and Maharashtra to desert the Indian Army and go back to their states to save their families. He further instigated the soldiers to close the borders of their respective states and propagated the idea of balkanization of India and independence of individual states. During investigation, it was revealed that Gurpatwant Singh Pannun, exploited cyber space to publicize his propaganda, and provoked the sentiments of people of across the country in general and of Punjab in particular to indulge in secessionist activities. It was further revealed that Gurpatwant Singh Pannun used media platform to issue threats to Government officers as well as for spreading the Pro-Khalistan ideology by uploading 06 provoking/instigating videos on YouTube Channel including a video stating that "UN Accepts Complaint against Prime Minister & Home Minister of India for R-Day Violence Against Farmers". Another video incited CM of West Bengal and Maharashtra to declare independence from Union of India. Gurpatwant Singh Pannun and SFJ further announced 250,000 US Dollars bounty on Army Officers who had participated in Operation 'Blue Star' propagating that they had committed genocide. It was also assured in the video that Rs.3000/- as oxygen money will be given to the citizens of West Bengal, Maharashtra, Uttar Pradesh and Punjab with the aim of creating disaffection towards the lawfully established Government of India and making imputations prejudicial to national integration and cession of the country. During investigation, proceedings under Section 82 Cr.P.C were initiated and Gurpatwant Singh Pannun, Chief-General Counsel of SFJ stands declared as 'Proclaimed Offender' by the Special NIA Court, PHC, New Delhi. The investigation in the case is still undergoing and chargesheet is yet to be filed. Testimony of PW-03 Shri Ashish Khari, Inspector of Police, CIB Division, National Investigation Agency (NIA), New Delhi highlights the aforesaid facts revealed in investigation.

(ii) As per **RC-02/2019/NIA/DLI** dated 15.01.2019, SFJ in conspiracy with other terrorist organisations and gangs had started a campaign in the name of "Punjab Referendum 2020 for Khalistan" and were raising funds and carrying out secessionist activities on ground as well as social media with an intention to instigate the members of Sikh community to agitate for the cession of the State of Punjab from the Union of India. Further investigation revealed Gurpatwant Singh Pannun had extensively used social media platforms and

on-ground campaigns to propagate anti-India rhetoric, incite communal violence, and spread disaffection among Sikhs, aiming to radicalize youth and create unrest in Punjab. SFJ leaders openly encouraged mutiny within security forces, urging Sikh soldiers to abandon the Indian Army. During the course of investigation, various videos and photographs of Gurpatwant Singh Pannun, Chief of SFJ were downloaded wherein Gurpatwant Singh Pannun is seen burning the Indian Tricolor and blaming Indian Flag for genocide of the Sikhs. Also, burnt remains of the Indian National Flag are shown to be sent to the Indian High Commission in Canada and photograph of Kashmiri militants is shown as freedom fighters and urged the Kashmiri militants and the Sikh soldiers to support the voter registration for referendum 2020. Another video showed SFJ activists namely Sabi Singh, Sarabjit Singh Banur, Sukhwinder Singh Thana and five other persons, three of them standing over the Indian National Flag and Sabi Singh saying that the Indian Tricolor is responsible for rape of Sikh women and murder of innumerable Sikh youth and urged all sikh to burn the Tricolor and support Referendum 2020 for Khalistan. Chargesheet was filed in aforesaid case against 16 accused including absconding accused. Proceedings under section 82 Cr.P.C were initiated and properties belonging to Gurpatwant Singh Pannun, Hardeep Singh Nijjar, Kulwant Singh Mothada, Avtar Singh Pannun, Sarabjit Singh Bannur and Gurpreet Singh Baagi have been attached. The aforesaid facts have been revealed in testimony of PW-17 Shri Raghvendra Vashistha, Inspector of Police, I&O Division, National Investigation Agency, New Delhi, which remains uncontroverted.

123. Intimidating threats issued by Gurpatwant Singh Pannun in respect of disruption of essential services, including power generation and global occlusion of Air India Flights

RC-30/2023/NIA/DLI dated 20.11.2023, relates to a larger conspiracy which was revealed during investigation that on 04.11.2023, Gurpatwant Singh Pannun posted a video on social media platforms, in which he warned members of the Sikh Panth not to travel by Air India after 19th November 2023 as there would be a 'global blockade' and their life could be in danger, and that Air India won't be allowed to operate in the world. Investigation revealed that in July 2022, SFJ members had removed Pandrol clips of Railway line about 400 yards from the Thermal Power Plant in Khedar, Hisar, Haryana, and in March, 2023 they again removed clips of railway tracks in the village Lehra Mohabbat, district Bathinda, Punjab and near Pathrala Railway Station, between Bathinda and Mandi Dabwali, Punjab. In the aforesaid context, Gurpatwant Singh Pannun claimed responsibility through videos uploaded on social medial platform, for causing damage to the said railway track through his aides, and also stated that the clips of the Railway line had been removed to stop the coal supplies. Further, the said act was the beginning of their design to block the coal supply to many Thermal Plants in the country. Apart from aforesaid facts revealed during investigation PW-15 Shri Migom Doley, Superintendent of Police, CIB Division National Investigation Agency, New Delhi, further testified that Gurpatwant Singh Pannun has been inciting and exhorting SFJ operatives to carry out acts of sabotage against railway tracks in Punjab to cause derailment/accident of Passenger and Goods trains, particularly those ferrying migrant labourers, and also asked his associates to plunge Delhi in darkness by disrupting coal supplies to the Power Plants. The videos and photographs of Gurpatwant Singh Pannun were downloaded from open source which revealed that SFJ is nothing more than a front organization for the terrorist groups

whose leaders are affiliated and closely associated with the SFJ. During investigation, it was revealed that members of SFJ had been recruiting Sikh youth through social media and instigating them to carry out illegal activities against the Government of India. In the said case, Gurpatwant Singh Pannun, through public statements, writings, and online videos, openly declared that SFJ's primary objective is to secure Punjab's separation from India and the creation of Khalistan State, which SFJ pursues through the endorsement of unlawful and terror-related activities in India. The investigation in the case is still undergoing and chargesheet is yet to be filed.

124. RC-40/2020/NIA/DLI dated 15.12.2020 reflects that SFJ and Gurpatwant Singh Pannun spearheaded a conspiracy in collaboration with Khalistani separatists, foreign nations, and non-state actor's hostile to India by infusing funds to galvanize the Khalistani movement, as revealed in deposition of PW-16 Shri Nidhin Lal, Superintendent of Police, National Investigation Agency, New Delhi. The case relates to collection of huge funds abroad for on-ground campaigns and propaganda against Government of India including staging demonstrations outside Indian Missions in countries like the USA, UK, Canada, Germany spearheaded by SFJ and designated terrorists like Gurpatwant Singh Pannun, Paramjit Singh Pamma, Hardeep Singh Nijjar and others. PW-16 testified in this regard that the funds were sent through Non-Governmental Organizations (NGOs) to pro-Khalistan elements based in India to incite impressionable youths to undertake terrorist acts and to strike terror in the people of India. The investigation in the aforesaid case is underway since all the accused arrayed therein are located abroad.

125. RC-30/2020/NIA/DLI dated 14.08.2020 relates to hoisting of Khalistani flags by accused on instructions of Gurpatwant Singh Pannun, as revealed in deposition of PW-20 Shri Sourabh Bhardwaj, Deputy Superintendent of Police, NIA, Delhi. The aforesaid case was registered on 14.08.2020, since two miscreants entered the Administrative Complex, DC Office, Moga and hoisted one saffron/yellowish coloured flag with word "KHALISTAN" inscribed on it which was fixed on an iron pole. They also cut the rope of Indian National Flag hoisted in the premises of DC Office Complex, Moga, due to which the Indian National Flag fell down and further dragged the Indian National Flag through the rope towards the outer gate of the DC complex. During the course of investigation, it was revealed that accused entered into a conspiracy to wage war against the Government of India in association with the leaders and cadres of Sikhs for Justice (SFJ) by way of circulation of the recorded video of the incident on various social media platforms. Further, the accused exhorted youth/radical Sikhs to hoist the Khalistan flag and circulated the recorded video of the incident with the intention to incite disaffection towards the Government established by law. Pursuant to investigation carried out by the NIA, Charge Sheet dated 11.02.2021 was filed before the concerned NIA Special Court, Mohali, Punjab against six accused, including Gurpatwant Singh Pannun, (i.e. Rana Singh @ Harpreet Singh, Inderjit Singh @ Inderjeet Singh @ Inderjit Singh Gill, Jaspal Singh @ Ampa, Akashdeep Singh @ Munna, and Jagwinder Singh @ Jagga). During investigation, it was also revealed that accused got motivated and radicalized by watching videos on social media of accused Gurpatwant Singh Pannun, wherein he announced that Haryana was a part of Punjab and after Khalistan is carved out, Haryana will become a part of Khalistan. Also, in said videos, Gurpatwant Singh Pannun promised to pay a prize money of \$2500 to whosoever hoists the flag of Khalistan at Punjab and Haryana in any Government place or Panchayat Houses

on 15 August. It was revealed in investigation that on 14.08.2020, accused Inderjit Singh, Jaspal Singh and Akashdeep Singh hoisted flag at DC office, Moga and on 17.08.2020, Inderjit and Jaspal reached at Amritsar. Inderjit again made a call to Rana Singh @ Harpreet Singh and asked for sending reward money in lieu of hoisting Khalistan flag at DC office complex, Moga in furtherance of conspiracy. Accordingly, Rana Singh @ Harpreet Singh sent MTCN code to Inderjit and conveyed that he has sent Rs.20000/- fund for hoisting of Khalistani flag by them. Based on the evidence on record, pursuant to the investigation carried out by NIA, 1st Supplementary Charge Sheet dated 19.02.2024 was filed before the NIA Special Court, Mohali, Punjab. During course of investigation, it was revealed that accused Rana Singh and Gurpatwant Singh Pannun collected funds in USA/ Richmond Hill, from many Indian residents belonging to Punjab & Haryana who had business, shops and stores over there, and used these funds for propagating against the Government of India to carve a separate State of Khalistan. It was also revealed that accused Rana Singh collected funds in connivance with accused Gurpatwant Singh Pannun and sent these funds to India to his supporters/sympathizers for secession of Punjab. The investigation revealed that members of SFJ have been recruiting Sikh youths through social media and instigating them to carry out illegal activities against the Government of India in lieu of money sent by proxies of SFJ from abroad. The Charge stands framed against the accused in the said case and the case is pending trial qua 06 accused. The aforesaid activities of SFJ which have been proved in testimony of PW-20, reflect that SFJ is involved in illegal activities supporting creation of Khalistan.

126. Death threats issued by Gurpatwant Singh Pannun to assassinate Hon'ble Prime Minister of India and Hon'ble Home Minister of India

Deposition of PW-11 Rajinder Pal Singh, Deputy Superintendent of Police, Investigation, District Barnala, Punjab with reference to FIR No. 317/2023, under Section 3 of the Punjab Prevention of Defacement of Property Act and Section 153 IPC reflects that 'death threats/appeal to assassinate' were issued by Gurpatwant Singh Pannun to assassinate Hon'ble the Prime Minister of India and Hon'ble the Home Minister of India. The said FIR was registered at City-2 Barnala, Punjab following the defacement of public property with slogans supporting the Khalistan movement. Secret information revealed that signboards installed outside the office of the Forest Range Officer on Handiaya Road and opposite the rest house, near the residence of the Deputy Commissioner were defaced by unknown persons, who wrote "SFJ" and "Khalistan" in English using black paint. Further, the signboard installed opposite the Deputy Commissioner's residence, carried the slogan "*SAHID NIJJAR DA BADLA MODI SHAH THOKO WORLD CUP ROKO SFJ*". Further on the statement of Gurmel Singh @ Booti, one Kulvir Singh, was named as an accused in the aforesaid FIR and was arrested on receiving a production warrant. On his disclosure, a spray bottle and a yellow-colored flag, with "KHALISTAN" written in Punjabi using black spray paint, were recovered in a black polythene bag near the location of defaced signboard. The case is pending at the stage of framing of Charge.

127. Death threats issued by Gurpatwant Singh Pannun to assassinate Shri Rahul Gandhi, Member of Parliament

PW-6 Ramanpreet Singh Gill, PPS, Deputy Superintendent of Police, Detective, Punjab with reference to FIR No. 01/2023 dated 03.01.2023, Police Station Sadar, Sri Muktsar Sahib, District Sri Muktsar

Sahib, Punjab testified that aforesaid FIR was registered as next to the back boundary wall of SSP Office, Bathinda Road Sri Muktsar Sahib, towards village Sangudhaun, some unknown persons had written Pro-Khalistani slogans “*Indira Thoki, Rahul Thoko, Punjab Khalistan Rocket Referendum*” in black paint. The investigation of the said FIR revealed acts of evoking and stirring up Khalistani sentiments in the form of Pro-Khalistani graffiti. PW-6 further deposed that probably the doer of the act was inspired by SFJ and Gurpatwant Singh Pannun to propagate Khalistani agenda of SFJ and Gurpatwant Singh Pannun. However, the identity of the accused could not be traced and accordingly, an Untrace Report u/s 173 Cr.P.C. was presented in the concerned Court on 04.12.2023.

128. Death threats issued by Gurpatwant Singh Pannun to assassinate Shri Captain Amarinder Singh, the then Chief Minister of Punjab.

FIR No. 34/2021 dated 30.08.2021 registered at PS: Punjab State Cyber Crime, SAS Nagar, Punjab reflects that death threat/appeal was issued by Gurpatwant Singh Pannun to assassinate Captain Amarinder Singh, the then Chief Minister of Punjab as testified by PW-19 Shri Simranjit Singh Lang (P.P.S.), Deputy Superintendent of Police, State Cyber Division, Punjab. The aforesaid FIR was registered on information that Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), New York, USA had posted a video on his Facebook page, namely “Khalistan Zindabaad Faridkot” in which he promoted the violent action and assassination of Captain Amarinder Singh, Chief Minister of Punjab. Video clip revealed Gurpatwant Singh Pannun targeting the poster of Captain Amarinder Singh, the then Chief Minister of Punjab with bullets. Procedure of the Mutual Legal Assistance Treaty (“MLAT”) stands initiated between India and USA with reference to the concerned Facebook accounts and the investigation in the case is underway.

129. Threat issued by Gurpatwant Singh Pannun against Government of Punjab and Police personnel

PW-19, Simranjit Singh Lang (P.P.S.), Deputy Superintendent of Police, State Cyber Division, Punjab with reference to FIR No. 24/2022 dated 02.05.2022, PS: Punjab State Cyber Crime, SAS Nagar, Punjab testified that aforesaid FIR was registered against Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), New York, USA since a video was posted on a YouTube channel named ‘US MEDIA INTERNATIONAL’ by Sikhs for Justice (SFJ), wherein Gurpatwant Singh Pannun is seen promoting violent action against Government of Punjab and also against the children of police personnel. During investigation, the concerned video was downloaded on a CD from social media and taken into possession on 22.10.2024. The investigation in the case is still underway and chargesheet is yet to be filed.

130. Call issued by Gurpatwant Singh Pannun to Sikh soldiers of Indian Army for not using the weapons for defending borders of India but to liberate Punjab

PW-19 testified that FIR No. 27/2022 dated 04.06.2022 under sections 131, 132, 135, 153, 153A, 153B, 505(1) and 506 IPC was registered at PS: State Cyber Crime, SAS Nagar (SAS Nagar (Mohali)), SAS

Nagar, Punjab against Gurpatwant Singh Pannun since he issued a call to Sikh soldiers of Indian Army through social media to stop defending Indian Borders and to gather at Sri Akal Takht Sahib to join “Khalistan Referendum”. The video clipping on YouTube was downloaded and exhibited. Mutual Legal Assistance Treaty (“MLAT”) stands initiated between India and USA with reference to the concerned Facebook accounts and chargesheet is yet to be filed.

131. Call made by Gurpatwant Singh Pannun to burn Indian flag and Constitution of India.

(i) **PW-10 Shri Navjot Singh**, PPS, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar with reference to FIR No. 168/2020 dated 02.07.2020, PS: B-Division, District-Commissionerate Amritsar (Punjab) testified that the said FIR was registered on statement of Loveleen @ Mattu, since a video of Gurpatwant Singh Pannun was circulating online, wherein, he identified himself as the legal advisor of Sikhs for Justice (SFJ) and propagator of “Referendum-2020” movement, on the Facebook page of ‘UK Media International’. In the said video, one of associates of Gurpatwant Singh Pannun is holding a lit torch (Mashaal) and Gurpatwant Singh Pannun makes provocative remarks, urging the members of Sikhs for Justice to set fire to Indian embassies worldwide. Further, in the video, Gurpatwant Singh Pannun and his accomplices can be seen setting fire to the Indian National Flag and images of the Indian Constitution, and also raising slogans in favour of Khalistan urging Sikhs worldwide to align with their religious identity, rejecting any association with India. Gurpatwant Singh Pannun further claimed that the Indian Constitution has caused the deaths of countless Sikhs and led to the martyrdom of over 150,000 Singh warriors and more than 10 million Sikhs.

The evidence in the said case strengthens the fact that Gurpatwant Singh Pannun intends to incite communal discord and disrupt public order across the country. During the course of investigation, a Look-Out Circular (LOC) was issued against Gurpatwant Singh Pannun on 30.01.2023, and a follow-up LOC was issued on 29.12.2023. The investigation in the case is still ongoing.

(ii) **FIR No. 43/2022 dated 09.08.2022**, PS: GRP Sirsa was registered with reference to uploading of video on social media on 31.07.2022 showing that Gurpatwant Singh Pannun had threatened the Chief Minister and Home Minister of Haryana Government, for daring to hoist the tricolor on 15th August. Further, Pannun promised to pay Rs.1.25 crore to unemployed individuals for joining his campaign. He further threatened to burn the tricolor in front of trains in Haryana from 13th August to 15th August. A tricolor could be seen burning on a railway track in the said video. PW-43 Shri Sumit Kumar, Superintendent of Police, GRP, Ambala Cantt., Haryana testified that during investigation, the call details/tower dump were taken into possession by IO. However, the accused in the said FIR could not be traced and accordingly, Untrace Report was filed before the concerned Court.

(iii) Testimony of PW-21 Smt. Anita Saini, Deputy Superintendent of Police/Admin/GRP/Punjab in FIR No. 65/2022 dated 11.08.2022, P.S. Govt. Railway Police, Amritsar (Punjab) reflects that the aforesaid FIR was registered since a burnt National Flag was found hanging on a tree at KM NO 503/25-27, under over bridge number 131-A between RLY-STN AMRITSAR-MANAWALA OVER BRIDGE. During the course

of investigation, a wooden stick was recovered from the place of incident which was taken into possession and the final report was submitted in the court of JMIC, Amritsar on 18.01.2023 against accused Raman @ Sonu and Lakhwinder Singh @ Lakha. The charge against the accused also stands framed in the said case vide order dated 06.07.2023.

132. Video issued by Gurpatwant Singh Pannun inciting religious feelings

Testimony of PW-10 Shri Navjot Singh, PPS, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar, in FIR No. 04/2024 dated 23.01.2024 reflects that the said FIR was registered at P.S. Division District Commissionerate against Gurpatwant Singh Pannun, Legal Advisor of Sikhs for Justice with reference to a viral video on Social Media Platform in which he is seen speaking against unity and integrity of India and spreading enmity between different groups on the basis of religion, giving hate speech, creating ill-will, spreading intimidation among the members of different communities. In the video Gurpatwant Singh Pannun claimed that, *“Amritsar foundation was laid down by Sri Guru Ram Dass ji the last of 15th Century. Therefore, there is no place of Durgiana Mandir in Amritsar which is made in the year 1920 and it has no any historical importance in the Hindu religion. If the Sikhs want to act upon the baseless decision of Modi Govt. that the Ayodhya relates to Sri Ram and Mandir was built forcibly on the place of Babri Masjid. Therefore, Durgiana Mandir should be closed and Keys should be handed over to Sri Darbar Sahib, Amritsar. The Sikhs did not destroy to any religious place. It is reminded that the destruction of Gurdwara Gian Godri in Haridwar. Gurdwara of Gawalior of 6th Guru Hargobind Sahib was changed in the Kali Mata Mandir and Gurdwara Mangu Matt was done buldoze in Odisha. Therefore it is appealed to the Sikh Youths of Punjab to reach on 26th January at Sri Akal Takhat Sahib for beginning of Khalistan Referendum Voter.”* The investigation in the case is pending.

133. Other cases relating to painting of Khalistani graffiti or hoisting of Khalistani flags & slogan writing

(i) PW-50 testified that FIR No. 116/2022 dated 20.06.2022 was registered at P.S.: City Sangrur since a Slogan ‘*Punjab Hal Khalistan 26 January and in English Refrendum 26 January, 2023*’ was written with black paint on the gate and wall of Mahakali Devi Temple Patiala Gate Sangrur. Gurpatwant Singh Pannun claimed responsibility for the said act in a video which went viral on social media.

(ii) PW-29 Dr. Vasudha Sood, Sub Divisional Police Officer, Amb Tehsil, District Una, Himachal Pradesh with reference to FIR No.63/2023 dated 29.11.2023 registered at Police Station Chintpurni, Tehsil Amb, District Una, Himachal Pradesh stated that the FIR pertains to inscription of *“Punjab Zindabad Shaheed Bhindranwala Zindabad Khalistan Zindabad Himachal Banagaya Khalistan”* written with black ink on the wall of Bhagta Bhai Dharamshala. Investigation revealed that friend of accused Arjinder Singh alias Jinder had sent Rs.25,000 on 27.11.2023, i.e., 2 days before the incident, through Western Union Money Transfer to Phool Chand. Further, Gurpatwant Singh Pannun took responsibility for writing pro-Khalistani slogans in Chintpurni Bazaar on 28th November 2023 through a viral video on social media. Chargesheet is

stated to have been prepared against accused Phool Chand, Arjinder Singh @ Jinder and Harry and prosecution sanction u/s 196 Cr.P.C. is awaited.

(iii) PW-50 Shri Palwinder Singh Cheema also testified that FIR No. 118/2022 dated 27.06.2022 was registered at P.S.: City Sangrur on basis of secret information received by Inspector Amrik Singh that Gurpatwant Singh Pannun hatched a conspiracy with mischeivoius persons and got written slogans like Khalistan Jindabad, SFJ, Khalistan on shutters of closed shops, parked cars, at Namdev Chowk , outer gate pillars of Water Supply and Sanitation Department, Punjab, gate of Ranbir Club and on the iron board of the District Rehabilitation of Handicapped Persons Centre. Gurpatwant Singh Pannun further took the responsibility of writing the said slogans through a video which was uploaded on social media. During the course of investigation, accused Resham Singh, Kulwinder Singh @ Binder and Manpreet Singh were arrested. Charge stands framed against said accused and matter is pending at the stage of prosecution evidence. LoC also stand issued against Gurpatwant Singh Pannun and his land in Amritsar has been attached by NIA.

134. FIR No. 77/2022 dated 08.05.2022, P.S. Dharamshala, District Kangra, Himachal Pradesh with reference to hanging of Khalistani banner along with Vidhan Sabha Tapovan building at District Kangra.

PW-46 Shri Narayan Singh, Station House Officer (SHO), PS Dharamshala, District Kangra, Himachal Pradesh deposed that FIR No. 77/2022 dated 08.05.2022, P.S. Dharamshala, District Kangra, Himachal Pradesh, was registered after yellow Khalistani banners were seen hanging along the main gate and wall of the Vidhan Sabha Tapovan building. Further, a video was widely circulated on Social Media and news channels wherein Gurpatwant Singh Pannun took responsibility for affixation of Khalistani flags at the said spot by members of SFJ. In the said video, a person also talked about the merger of Himachal Pradesh with the State of Punjab through Referendum on 6th June 2023 and declaring the State of Himachal Pradesh as Khalistan State. During investigation, accused Harvir Singh and Paramjeet Singh @ Pamma were arrested. Further investigation revealed that Harvir Singh was an active member of WhatsApp group namely 'US MEDIA 13 INTERNATIONAL' wherein he received messages with instructions to hoist the Khalistan flags at Vidhan Sabha Tapovan Dharmshala. The accused recorded the act and forwarded the same to an International number. Chargesheet has been filed in said case and is pending trial.

135. The following cases further highlight where Khalistani flags were hoisted or Khalistan inspired graffiti was painted by accused at behest of Gurpatwant Singh Pannun, Chief Protagonist SFJ, for financial consideration. The responsibility of commission of crime was subsequently taken by Gurpatwant Singh Pannun by circulating videos on social media platforms:

(i) **FIR No. 18/2023, PS: Special Cell, Delhi Police:** As revealed in the testimony of PW1- ACP Ved Prakash, the case **FIR No. 18/2023** under Sections 153B and 120B IPC, PS: Special Cell, Delhi Police, pertains to pro-Khalistani graffiti that appeared in various locations across Western Delhi, including Vikaspuri, Janakpuri, Paschim Vihar, Peeragarhi, and Meera Bagh. The graffiti prominently displayed

slogans such as "*Khalistan Zindabad*", "*SFJ*", "*1984*", "*Punjab Banega Khalistan*", and "*Referendum 2020 vote for Khalistan*", written in both English and Punjabi. These slogans were designed to promote secessionist ideologies and disrupt the sovereignty and territorial integrity of India. On 29th January 2023, two accused, Vikram Singh and Balram Singh, were arrested. Their arrest and subsequent disclosure statements revealed that they had been directed by Gagandeep Singh, an associate of Gurpatwant Singh Pannun, to paint the graffiti in Sikh-dominated areas to garner support for the Khalistani movement. Gurpatwant Singh Pannun had also participated in video calls, giving instructions and promising financial rewards for the activities. The investigation uncovered that Vikram Singh received Rs. 30,000/- through a money transfer from the United States, sent by Gagandeep Singh, as payment for carrying out the graffiti work. This financial link was corroborated with a receipt from a money transfer service. The case is now pending before the trial court, with charges set to be framed on 17th January 2025.

(ii) The testimony of PW-38 Manmohan Singh, Assistant Commissioner of Police Headquarters, Commissionerate Jalandhar pertains to three cases: i.e. **FIR No.76 of 2022**, PS: Division 3, Commissionerate, Jalandhar; **FIR No.66 of 2022**, PS: Cantt., Commissionerate, Jalandhar and **FIR No.102 of 2022**, PS: Navi Baradari.

FIR No. 76/2022 Police Station Division No. 3, Jalandhar: FIR No. 76 dated 15.06.2022, Police Station Division No. 3, Jalandhar, Punjab, revolves around an incident of anti-national graffiti. During the night of 14-15 June 2022, the police received confidential information that "*Khalistan Zindabad*" had been spray-painted on the wall outside the office of Gulshan Sharma in Lakshimpura Mohalla, Jalandhar. The graffiti, written in Punjabi with black spray paint, was intended to incite separatist sentiments and promote an anti-national agenda. The investigation led to the arrest of Manjit Singh alias Meet, a resident of Village Daldi in Patiala, on 12.07.2022. During interrogation, Manjit Singh confessed that on the night of the incident, he had spray-painted the words "*Khalistan Zindabad*" on the wall under a streetlight, and recorded a video of the act. He then forwarded the video to Gurpatwant Singh Pannun and Vikramjit Singh Khalsa, both based in the USA.

The chargesheet against Manjit Singh stands filed in the Court. Though, the Trial Court discharged Manjit Singh on 19.04.2023, citing insufficient evidence, co-accused, Gurpatwant Singh Pannun and Vikramjit Singh, remain at large.

FIR No.66/2022, PS: Cantt., Commissionerate, Jalandhar: This case pertains to anti-national activities involving the promotion of separatist sentiments through graffiti on a wall of the PAP Complex in Jalandhar. The graffiti, which read "*04 July 1955 26 January Vota Khalistan Zindabad*", was written with black ink and was part of an effort to incite pro-Khalistani sentiments, disturb peace and harmony, and promote a secessionist agenda. Soon after, a video went viral on social media, linking the graffiti to Gurpatwant Singh Pannun, a known Khalistani supporter based abroad. The video claimed responsibility for the act and highlighted it as part of a broader effort to instigate separatism in India. During the investigation, a breakthrough came from a related case (**FIR No. 102/2022**, PS Navi Baradari) in which the accused Raman alias Sonu confessed to having written the graffiti on the PAP Complex wall in June 2022. He revealed that he had been instructed by Bikramjit Singh Khalsa, who called him via WhatsApp, and paid him Rs. 40,000/-

to carry out the act. Raman alias Sonu was arrested on 30 September 2024 in the present case. Raman further confessed that he had personally written the slogans on the PAP wall and received the promised payment for his actions. The investigation confirmed the use of encrypted communication platforms like WhatsApp to plan and execute this anti-national activity.

On 14th August 2024, charge was formally framed against Raman alias Sonu by the concerned court and the case is at the stage of prosecution evidence.

This case highlights the deliberate use of financial incentives and encrypted communications to carry out acts aimed at destabilizing public order. It underscores the broader implications of such incidents in fostering anti-national sentiment.

FIR No. 102/2022, PS: Navi Baradari: On 28 August 2022, Inspector Anil Kumar of Police Station Navi Baradari, while on duty near Kamal Palace Hotel Chowk, received secret information about graffiti on the statue of Shaheed Beant Singh, former Chief Minister of Punjab, located at BMC Chowk. The graffiti read “*Khalistan Zindabad Hindustan Murdabad*”, intended to incite separatist sentiments and disrupt peace in Punjab. The secret informer also revealed that the act was allegedly orchestrated by Gurpatwant Singh Pannun, a known Khalistani supporter based abroad, as part of his broader anti-national agenda to create Khalistan. A video of the incident, which had gone viral on social media was downloaded, saved onto a pen drive, and submitted as evidence. The investigation led to the arrest of Raman alias Sonu, Lakhwinder Singh alias Lakha, and Sam, based on secret information. During interrogation, Raman alias Sonu disclosed that Lakhwinder Singh alias Hargun had contacted him and offered Rs. 15,000/- in cash, promising an additional Rs. 7,500/- for writing the slogans on the statue. Raman also revealed that Bikramjit Singh Khalsa had contacted him via WhatsApp and provided further instructions for the act. For this task, Raman received Rs. 60,000/-, out of which he retained Rs. 30,000/- and distributed Rs. 15,000/- each to the other co-accused.

Chargesheet stands filed in the court of, JMIC, Jalandhar, on 5 December 2022. Later, after obtaining necessary sanctions, a supplementary chargesheet was submitted on 26 September 2023 in the court. The court framed charge on 5 February 2024, and the case is currently at the stage of prosecution evidence. This case also highlights the use of financial incentives, encrypted communications, and social media to execute coordinated anti-national acts aimed at fostering separatist sentiments and disrupting national harmony.

(iii) FIR No.207/2023 PS Dehra, District Kangra, Himachal Pradesh: This case pertains to act of defacement involving the writing of pro-Khalistani slogans on the shutters of a building in Dehra, Himachal Pradesh. The slogans, such as “*SHAH HIMACHAL BANAGAY KHALISTAN*” and “*SHAHEED BHINDRAN VALE ZINDABAD KHALISTAN ZINDABAD HIMACHAL BANA GAYA KHALISTAN*”, were intended to incite communal tensions between Hindus and Sikhs, promote separatist ideologies, and disrupt peace in the region. As is revealed in testimony of PW-45, Sandeep Pathania, Station House Officer (SHO), PS Dehra, District Kangra, Himachal Pradesh, joint police team from Dehra and Chintpurni arrested Phool Chand, Harry and Arjinder Singh alias Jinder on 2 December 2023 in Gauraya, District Jalandhar, Punjab. The three accused had already been arrested in a related case (**FIR No. 63/2023 PS Chintapurni**) for similar pro-Khalistani graffiti in Chintpurni Bazaar. Further investigation revealed a financial connection to the incident. Two days before the graffiti appeared, Rs. 25,000/- was transferred to Phool Chand via Western Union

Money Transfer by a friend of Arjinder Singh alias Jinder. This transfer was confirmed through records obtained from Western Union. A viral video also surfaced on social media, wherein Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), claimed responsibility for the slogans. The case is under investigation.

(iv) **FIR No. 52/2022 P.S. City Rupnagar, Punjab:** This case pertains to promotion of pro-Khalistani propaganda and incitement of separatist sentiment through the use of banner and a viral video. PW-14 Navneet Singh Mahal, Superintendent of Police, (PBI), Rupnagar, Punjab deposed that on 13 April 2022, a banner with the word "*Khalistan*" written on it was found tied to trees outside the District Administrative Complex in Rupnagar, Punjab. Shortly thereafter, a video was made viral on social media by Gurpatwant Singh Pannun, the head of the banned organization SFJ. In the video, Pannun congratulated the Sikh community on *Khalsa Sajna Diwas* and claimed responsibility for the act. He referred to the banner as a symbolic gesture of the campaign to "*free Punjab from Indian governance*" and promote the Khalistan Referendum. The video also included inflammatory rhetoric targeting the Indian government and its representatives, escalating the act to a broader separatist campaign. During the investigation, two individuals, Harbir Singh alias Raju and Paramjit Singh alias Pamma, were apprehended. Upon interrogation, the duo confessed to their involvement. The investigation culminated in the filing of a chargesheet in court. On 5 November 2022, the court formally framed charge against the accused.

(v) **FIR NO.130 of 2022 registered at PS Sadar, Ferozepur:** This case pertains to defacement of public property with pro-Khalistan slogans and the dissemination of inflammatory propaganda by Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). PW-7 Sukhwinder Singh, Deputy Superintendent of Police, City, Ferozepur, Punjab testified that the incident was reported in Ferozepur, and revolves around efforts to promote separatist sentiments and disrupt communal harmony. On 13 June 2022, while traveling near Main Chowk Sher Shah Wali, a secret informer stopped a government vehicle carrying Satwinder Singh, Deputy Superintendent of Police (DSP), Ferozepur and provided critical information about slogans such as "*Sikhs for Justice*" and "*Khalistan Zindabad*" written in black ink on the walls of the Divisional Railway Manager's (DRM) office of the Northern Railway, Ferozepur Division. The slogans were supported by posters promoting similar separatist propaganda. To substantiate the information, the informer showed a video on his mobile phone, which featured Gurpatwant Singh Pannun, the General Counsel of Sikhs for Justice, a banned organization. In the video, Pannun claimed responsibility for the slogans and made provocative remarks targeting public order. He stated that similar graffiti had been scribed on the walls of the residence of DC Amrit Singh in Ferozepur and declared the act as part of SFJ's campaign to promote Khalistan. The inflammatory statements and the use of public spaces to disseminate anti-national propaganda are clear attempts to incite separatist sentiments and disrupt communal harmony. The investigation is ongoing.

(vi) **FIR No.118/2022, PS: City Sangrur, Punjab:** This case pertains to anti-national activities involving the defacement of public and private property with pro-Khalistani slogans in various locations in Sangrur, Punjab, on 27 June 2022. The slogans, such as "*Khalistan Zindabad*" and "*SFJ*" (Sikhs for Justice), were found written with spray paint on shutters of shops, parked cars, gates of public buildings, and other

structures, including the Water Supply and Sanitation Department and the Ranbir Club. The testimony of PW-50 Palwinder Singh Cheema, Superintendent of Police, Special Branch-cum-Investigation, Sangrur, Punjab reveals that the incident came to light when Inspector Amrik Singh, SHO of Police Station City Sangrur, received secret information that the slogans were part of a conspiracy orchestrated by Gurpatwant Singh Pannun, the leader of the banned organization Sikhs for Justice (SFJ). Pannun later took responsibility for the slogans in a video uploaded to social media, where he further propagated pro-Khalistani sentiments. During the investigation, Resham Singh, Kulwinder Singh alias Binder, and Manpreet Singh were identified and arrested on 30 June 2022. Chargesheet was filed against the three accused and the case is currently under trial before the Additional Sessions Judge, Sangrur. Additionally, a Lookout Circular stands issued against Gurpatwant Singh Pannun and his land in Amritsar has been attached by the National Investigation Agency (NIA). The case reflects a coordinated effort to incite separatist sentiment and disrupt public order in Punjab through targeted propaganda and vandalism.

(vii) FIR No.89/2022, PS-Dayalpur, District-Bathinda: This case pertains to defacement of property with pro-Khalistan slogans and the dissemination of inflammatory propaganda by Gurpatwant Singh Pannun. Testimony of PW-32 Narinder Singh, Superintendent of Police, City, Bathinda reveals that during a morning inspection at around 7:00 AM on 07.07.2022, police discovered pro-Khalistan slogans written in black ink on walls and roads around the Dera Salabatpura. The slogans included messages such as “*Punjab Hal Khalistan SFJ*”, “*Beadbi da hal Khalistan SFJ, Badla Lawange 26 January, referendum one crore*”, and “*Khalistan Jindabad, Sri Guru Granth Sahib, Badla Lawange, SFJ*”. Shortly after the discovery, a video surfaced on social media in which Gurpatwant Singh Pannun, claimed responsibility for the slogans. In the video, Pannun asserted that his associates had written the slogans to promote the Khalistan movement and provoke communal discord. The content of the slogans and the video are a direct attempt to disrupt peace in Punjab, advocate for secession, and challenge India's sovereignty. During the investigation, Amrit Pal Singh alias Amrit Gill, was arrested as accused in the case. The chargesheet named both Amrit Pal Singh and Gurpatwant Singh Pannun as accused. Lookout Circular (LOC) stands issued against Gurpatwant Singh Pannun. The case is under trial and underscores the deliberate use of graffiti and digital propaganda by SFJ to further their secessionist agenda and disrupt societal harmony in Punjab.

(viii) FIR No.91/2022 PS-Thermal, Bathinda: Testimony of PW-32 Narinder Singh reveals that **FIR No.91/2022** involves defacement of public property with slogans promoting Khalistan and anti-India sentiments in Bathinda, allegedly orchestrated by Gurpatwant Singh Pannun, Chief of the banned organization Sikhs for Justice (SFJ). The incident occurred in Bathinda, Punjab, and targeted communal harmony and public order by inciting hatred among religious groups. On October 2, 2022, Police received credible information about slogans such as “*Hindustan Murdabad*,” “*Muslim Sikh Bhai Bhai*,” “*SFJ*,” and “*Khalistan-Pakistan Zindabad*” being written in black ink on the wall of the Forest Department near Papiha Palace, Joganand Road. The slogans intended to create communal discord and spread anti-national propaganda. Subsequently, on October 19, 2022, a second incident came to light regarding additional Khalistani slogans written under the overbridge on Malout Road, near the Thermal Plant railway tracks. A video was also circulating on social media, in which Gurpatwant Singh Pannun claimed responsibility for the

slogans, linking them to the ongoing Interpol Assembly and further propagated anti-India and pro-Khalistan sentiments. The video features slogans such as “*Khalistan Zindabad*” and “*Hindustan Murdabad*”, written to incite separatism and disturb peace in Punjab. During investigation, Rajwinder Singh and Pritpal Singh were identified as co-accused and chargesheet was accordingly filed. Efforts to apprehend Gurpatwant Singh Pannun, believed to be the mastermind behind these activities, are ongoing.

(ix) **FIR No. 13/2023 Police Station Smalsar, District Moga, State Punjab:** Testimony of PW-35 Lavdeep Singh Gill, PPS, Deputy Superintendent of Police, Detection, District Moga reveals that on February 27, 2023, slogans such as “*Khalistan Zindabad*” and “*G-20 Foreign Minister, Punjab is not a India*” were found written on the outer wall of Polytechnic College Rode in Moga, Punjab. This led to the registration of the case. Despite investigation, the accused could not be identified. An Untrace Report has been accordingly filed.

136. Terror financing case where money was offered for raising Khalistani flag at India Gate on Republic Day

PW-1 Shri Ved Prakash, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi Police, Delhi testified that FIR No. 28/2021 dated 14.01.2021, P.S. Special Cell, Delhi, was registered on the basis of a secret information that on website www.punjabreferendumcommission.org, SFJ was offering money for raising Khalistan Flag at India Gate on Republic Day. A copy of an SFJ letter was received from sources which stated that “*SFJ offers USD 250K for raising Khalistan flag at India Gate on R-Day. January 11, 2021, New York.*” Further, SFJ called upon the farmers of Punjab who were protesting at Singhu Border to raise Khalistan Flag at India Gate on January 26 and receive a reward of USD 2,50,000, ahead of India's 72nd Republic Day. SFJ also called upon the farmers to take out a parallel "Kesri" tractor rally in defiance of India's Republic Day parade to mark their resistance against Government's agricultural reform bills. SFJ also announced that farmers who will raise Khalistan Flag at India Gate will be provided legal assistance for resettlement as refugee in United Kingdom. Reference was also made to a non-governmental referendum on the question of secession of Punjab from India was to be held by SFJ, for which voting was to begin on August 15 from London, UK. In the aforesaid context, notices were served to social media platforms seeking details of the registered user. PW-1 further stated that request seeking mutual legal assistance from US based social media platform is still awaited and further proceedings as per law would be taken upon receiving information.

137. Cases of unlawful activities obstructing the holding of G-20 Summit by Gurpatwant Singh Pannun in the name of Khalistan movement

(i) **PW-51 Shri Varun Singla**, Superintendent of Police, Kurukshetra, Haryana deposed that FIR No. 81/2023 dated 05.04.2023 Police Station-Ismailabad, Kurukshetra was registered at instance of EASI Lakha Singh, who stated that holding of G-20 Summit in the month of February in Delhi and Gurugram was protested on social media by Gurpatwant Singh Pannun, Chief of Sikhs for Justice. Gurpatwant Singh Pannun

uploaded videos and exhorted for placing of banners, flags etc. Further, on 05.04.2023, it was found that someone had written in English on the wall of flyover, NH 152-D, “KHALISTAN WELCOME G-20 IN DELHI. A video was also issued by Gurpatwant Singh Pannun wherein he spoke about KHALISTAN WELCOME G-20 IN DELHI. During investigation, accused Malak Singh was apprehended who disclosed in his disclosure statement that the act had been done on instructions of Gurpatwant Singh Pannun and he received Rs.20,000/- as consideration for painting the slogan, out of which Rs.2,000/- was recovered from almirah of his house. After filing of chargesheet, charge has been framed against the accused in the said case.

(ii) **PW-10 Navjot Singh**, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar, Punjab, testified that FIR No. 23/2023 dated 07.03.2023 was registered at PS-Verka, District-Commissionerate Amritsar, Punjab against Gurpatwant Singh Pannun, Attorney-cum-General Counsel for Sikhs for Justice (SFJ) for circulating a video wherein he is seen making provocative statements like “Punjab is not a part of India” and announced plans to disrupt train services on March 15 and 16. Gurpatwant Singh Pannun also claimed hoisting of Khalistan flag at Verka Bypass in Amritsar in protest, coinciding with the G-20 summit being held in the city. A banner with the message “G-20 welcome to Khalistan” was displayed, reiterating the claim that “Punjab is not India”. In the aforesaid video, Gurpatwant Singh Pannun also warned that train stations at Amritsar, Ludhiana, Bathinda and Firozpur will be shut down on March 15 and 16 to send a message that “Punjab is not part of India.” and asserted that SFJ supporters present at Verka Bypass in Amritsar will confront the G-20 delegates during their visit on those dates, chanting, “Long live Khalistan. During investigation, a yellow banner containing provocative messages, including “G-20 welcome to Khalistan,” “Punjab is not India,” and an appeal to stop train services on March 15-16 was recovered which formed concrete evidence to corroborate that Gurpatwant Singh Pannun and his associates were involved in illegal activities, inciting the people of Punjab to support the Khalistan movement and to disrupt train services during the G-20 summit. The investigation in the aforesaid FIR is underway.

(iii) **PW-43 Shri Sumit Kumar**, Superintendent of Police, GRP, Ambala Cantt., Haryana with reference to FIR No. 48/2023 dated 05.09.2023 registered at PS: GRP, Kurukshetra deposed that a video clip was circulated wherein Gurpatwant Singh Pannun, Incharge SFJ advocated writing of slogans in respect of Khalistan. Further, LSI Parvinder Kaur informed that slogan had been written in Punjabi ‘G-20 (Punjab India da hissa nahi)’, ‘G-20 Punjab is not India’, ‘SFJ’ in English ‘Gurpatwant Singh Punnu SSSJ-IAISFJ’ on walls. Accused Malak Singh arrested in another FIR No.705/2023 P.S. Kashmere Gate discharged and admitted his involvement and was accordingly was named as accused. After filing of chargesheet, charge is stated to have been framed against the accused and trial is pending at the stage of prosecution evidence.

138. Cases of hoisting of Khalistani banners and financing

As revealed in testimony of **PW-37 Shri Lavdeep Singh Gill**, PPS, Deputy Superintendent of Police, Detection, District Moga, Punjab, FIR No. 398/2022 dated 28.07.2022 registered at Police Station-Baldev Nagar, Ambala involves hoisting of banner at M.T. Crossing, Air Force Station Road. A banner with the

words “HARYANA BANEGA KHALISTAN-REFRENDUM VOTING 26th JANUARY” along with a religious sign was recovered during investigation. Harvinder Singh @ Prince and Prem Singh @ Ekam who were already in custody in another FIR were named as accused in the said FIR on the basis of their disclosure that they had put up the banner on instructions of Gurpatwant Singh Pannun . They further disclosed that they received banner from one Harsh who is leader of the Khalistani movement and an admin of a WhatsApp group created by Gurpatwant Singh Pannun. Further, Accused Prem Singh @ Ekam also received an amount of Rs.25,000/- from Gurpatwant Singh Pannun for hoisting Khalistani banners. Chargesheet stands filed and charge has been framed against the accused. The case is pending at the stage of prosecution evidence.

123. (i) Testimony of PW-13 Shri Vaibhav Sehgal, PPS, Superintendent of Police, Investigation, Malerkotla, Punjab, with reference to FIR No. 107/2022 dated 01.05.2022 registered at Police Station Malerkotla reveals that aforesaid case was registered since a saffron colour flag (with logo of ‘Khanda’) and a saffron cloth banner on which ‘*Punjab Hall Khalistan, Khalistan Jindabad*’, written in Punjabi, was found to be hoisted on the wall of Nirankari Bhawan, Malerkotla, side gate of DC Office, Malerkotla by some unknown person. During investigation, accused Happy was arrayed as an accused, who disclosed that he had committed this offence on the intervening night of 28/29.04.2022 and was also going to install similar flags and banners which are available in his house. Charge against the accused stands framed vide order dated 01.10.2022 and the case is pending at stage of recording of prosecution evidence.

(ii) PW-21 Smt. Anita Saini, Deputy Superintendent of Police/Admin/GRP/ Punjab deposed that FIR No. 62/2023 dated 05.09.2023 was registered at P.S. GRP, Bhatinda since a Red Colour Flag had been furled by unknown person on the track of the railway line with word “Khalistan” inscribed on the said Flag with black letters. During investigation, the said flag was produced by Station Superintendent and was taken into custody vide recovery memo dated 05.09.2023. The case is still under investigation.

(iii) PW-09 Shri Paramjit Singh, No. 170/INT, Inspector Counter Intelligence Bathinda, deposed that FIR No.233/ 2023 dated 03.12.2023 was registered at P.S. Canal Colony, Bhatinda, on information that Harmanpreet Singh and Lovepreet Singh, who were active members of Sikhs for Justice (SFJ) had allegedly planned to write Khalistani and SFJ slogans on public buildings. In a joint operation, suspects were apprehended and three spray cans along with a piece of saffron cloth displaying "Khalistan Zindabad" and "SFJ" written in black spray paint, were recovered. During the course of investigation, accused admitted to having established contact with Jagjeet Singh, associated with SFJ, via Twitter in August 2023, and acting on his directives, they hoisted a Khalistan flag under a bridge in Bathinda on 15th August 2023; wrote Khalistan slogans at Hanumangarh Railway Station in Rajasthan on 23rd October 2023; wrote "Khalistan Zindabad" and "SFJ" slogans at Bhandari Bridge Railway Station, Amritsar on 28th November 2023, and Lovepreet Singh wrote slogans in Dharmshala, Himachal Pradesh on 3rd October 2023. During investigation, the accused further disclosed that they received monetary compensation from Jagjeet Singh through Western Union for their activities. The investigation in the case is still pending.

(iv) PW-51 Shri Varun Singla, Superintendent of Police, Kurukshetra, Haryana, deposed that FIR No.229/ 2022 dated 29.04.2022 was registered at P.S. Thanesar City, Kurukshetra since outside residence of

DSP, a white sheet was hung with “*KHALISTAN*” written on it in Punjabi. During investigation, it was revealed that a similar case was registered in Dharamshala, Kangra, Himachal Pradesh vide **FIR No.77/ 2022** wherein accused Paramjit Singh and Harveer Singh therein had made a disclosure statement that they had pasted a Khalistani banner in Kurukshetra. Accordingly, production warrants were issued since accused were lodged in Kangra Jail, Himachal Pradesh. Later on, accused Paramjit Singh and Harveer Singh made a disclosure statement dated 30.05.2022. During course of investigation, accused further identified the place of incident wherein the banner was put up at instructions of Gurpatwant Singh Pannun and also identified the recovered sheet on which “*KHALISTAN*” was written as deposited in Malkhana. Further, accused Harveer Singh also took the Police party to Krishna Talls Agency (Shop) and identified the same from where the bedsheet and spray paint were purchased. Chargesheet in the said case stands filed on 25.07.2024, but the investigation in respect of Gurpatwant Singh Pannun is pending. The case is pending trial before the concerned Court at Kurukshetra.

(v) **PW-47 Shri Ram Swroop Thakur**, Station House Officer (SHO), PS Shimla West (also referred to as PS Boileauganj), District Shimla, Himachal Pradesh, deposed that **FIR No.221/2022 dated 08.09.2022** was registered at P.S. Shimla West, Himachal Pradesh since a yellow cloth with logo inscribed with “*KHALISTHAN*” was found hanging on the main gate of Jal Shakti Bhawan. During investigation, it was revealed that one Raman @ Sonu and Sam, who were arrested by Punjab Police in FIR No.102/2022 dated 08.08.2022 registered at Police Station: Navi Bradari, Jalandhar, disclosed that on 05.09.2022, they had travelled to Shimla and hoisted the flag of Khalistan on the main gate of Jal Shakti Bhawan, Tutikandi. Since both the accused were in judicial custody at Central Jail Kapurthala in Punjab, production warrants were obtained from the Competent Court and the accused were formally arrested on 12.01.2023. Further, accused Raman @ Sonu made a disclosure statement regarding hoisting of flag and making of video with his mobile phone which he had sent to a person named Vikramjit in America, with whom he used to talk on WhatsApp call. Chargesheet in the said case stands filed against accused Raman @ Sonu and Sam and the case is pending trial before CJM, Shimla.

124. (i) PW-40 Shri Harwinder Pal Singh, DSP/SSOC/Amritsar with reference to FIR No. 03/2019 registered at PS- SSOC/Amritsar deposed that FIR was registered on secret information that Baljit Singh, Jagdev Singh @ Jagga and Manjit Singh have procured arms and ammunition illegally to give effect to criminal activity and were seen roaming near City Centre market at backside of Sangam Cinema. Accused Baljit Singh, Jagdev Singh @ Jagga and Manjit Singh were apprehended and on personal search, 02 Pistols 0.32 bore along with 03 Magazines and 14 live cartridges were recovered from their possession. The accused could not provide any legal documents, permit or licence for possessing the arms and ammunition. Charge under the Arms Act against the accused was accordingly framed and investigation under Section 173(8) Cr.P.C. with regard to offences under UAPA is still in progress.

(ii) **PW-36 Shri Jasbir Singh**, Superintendent of Police, Special Branch, District Patiala deposed that **FIR No.148/2022 dated 15.07.2022**, Police Station Lahori Gate, District Patiala, was registered on statement

of ASI Babu Lal, who stated that on 14.07.2022, while he was on duty, a yellow-colored banner was seen pasted at the backside of Sri Kali Mata Temple, Patiala whereupon words "SFJ" and "HUL KHALISTAN REFERENDUM 26 JANUARY" were printed with black ink. During the investigation, statement of Ashutosh Gautam, General Secretary of Hindu Suraksha Samiti and member of Veer Haqiqat Rai Sabha was recorded, who reached the spot when the police were removing the said poster. He stated that Harwinder Singh @ Prince along with Prem Singh @ Ekam had pasted the said banner on the backside of temple on the intervening night of 14/15.7.2022. On the basis of aforesaid statement, accused Harwinder Singh @ Prince and Prem Singh @ Ekam, were arrested. During the course of investigation, it was found that the accused had taken photographs and sent them to Gurpatwant Singh Pannun through Whatsapp, who in turn made video of the same viral on social media. In the said video, Gurpatwant Singh Pannun is seen stating that "*Sikh for justice is sending message to newly elected Bhagwant Mann, Chief Minister of Punjab and Director General of Police, Punjab Gaurav Yadav, that today the Punjab for Khalistan Referendums have pasted flag of Khalistan outside the Sri Kali Mata Devi, Patiala. The hands that are pasting Khalistan Flag, they know now how to tackle the situation and also very well know how to use rocket. SFJ has assigned referendum in those hands, who know how to use rocket, if you do not stop registering FIR against SFJ Workers, they can use rockets. This message is of Gurpatwant Singh Pannu*". Further, 14 similar banners were recovered from the motorcycle of the accused. Offences under Section 153-B, 120-B IPC and Sections 13 and 18 of Unlawful Activities (Prevention) Act were added on 20.07.2022 and Gurpatwant Singh Pannun was also nominated (named) as an accused in this case. During investigation, it was found that accused Harwinder Singh @ Prince was in regular touch with Gurpatwant Singh Pannun and both the accused had received Rs.25,000.- from Gurpatwant Singh Pannun. Chargesheet has been filed in the said case and further proceedings for declaring Gurpatwant Singh Pannun as a proclaimed offender have been initiated.

139. In the following cases Gurpatwant Singh Pannun further used cyber space and electronic means to radicalize gullible youth and spread threats by sending pre-recorded audio messages:

(i) PW-1 Ved Prakash, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi Police, Delhi with reference to **FIR No. 06/2022**, PS Special Cell, Delhi testified that the case pertains to members of the Supreme Court Advocates-on-Record Association (SCAORA) wherein a series of pre-recorded threatening voice calls were received from an international number (+447418365564). The calls were attributed to Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). In these messages, Pannun claimed responsibility for the blockade of the Prime Minister's convoy in Firozpur, Punjab, on January 5, 2022, which had raised serious security concerns nationwide. Using threatening language, the caller warned Hon'ble Judges of the Supreme Court to refrain from involvement in legal proceedings related to the security breach incident. Investigation reveals that the calls had originated from outside India. Telecommunication data from Nexmo, a US-based telecom service provider, confirmed that the numbers used in the calls were associated with SFJ, USA. Recordings of the calls were analyzed by the Central Forensic Science Laboratory (CFSL), Delhi, which confirmed that the voice in the calls matched

that of Pannun, based on a comparative sample from an interview he had given to a media outlet. The case remains open, with authorities actively pursuing international assistance and further evidence to advance proceedings against the accused.

(ii) PW 2 Sanjay Dutt, Assistant Commissioner of Police, Special Cell, South Western Range, Janakpuri, Delhi Police, New Delhi deposed with reference to **FIR No. 314/2024** and **FIR No. 315/2024** both registered at PS Special Cell, New Delhi.

FIR No.314/2024 pertains to threatening prerecorded voice notes sent to two Members of Parliament (Rajya Sabha) from Kerala, allegedly by Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). The incident on July 21, 2024, involves direct threats to Indian parliamentary institutions and Members of Parliament, with a call to action promoting the Khalistan referendum agenda. The prerecorded note was sent for forensic analysis to compare the voice with recordings of Gurpatwant Singh Pannun from his previous public interviews. A letter was also sent to Interpol to trace the origin and user of the international number (+447418603423), while parallel efforts were launched to identify the user of the Indian mobile number. The investigation in the case is ongoing.

FIR 315/2024 pertains to a prerecorded voice message, received on the landline number at the official residence of the Defence Minister of India which proclaimed that SFJ intended to bombard the Indian Parliament and the Red Fort area with messages supporting the Khalistan referendum. The message alleged that Sikhs were facing existential threats under Indian governance and warned Members of Parliament to stay home if they did not want to "experience" the Khalistan referendum. The investigation is ongoing.

(iii) PW 26 Siddhant Jain, Superintendent of Police, Dabwali, Haryana deposed with reference to FIR No. No. 137/2020, P.S. Bhondsi, Gurugram, FIR No. 45/2021, P.S. Cyber Crime, Gurugram and FIR No. 52/2021, P.S. Cyber Crime, Gurugram, which again relate to misuse of cyberspace and electronic means to radicalize gullible youth and spread threats by sending pre-recorded audio messages:

FIR No. 137/2020, PS Bhondsi, Gurugram, revolves around a pre-recorded audio-video message circulated online, allegedly by Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). In the message, Pannun accused people of Haryana and government of being hostile towards Sikhs and Punjabis, with the intent to create communal discord and provoke animosity. The original source of the message could not be identified and on November 29, 2023, an Untrace Report was prepared.

FIR No. 45/2021, PS Cyber Crime, Gurugram, pertains to another audio-video message circulated online, which is attributed to Gurpatwant Singh Pannun. In the message, Pannun accused people of Haryana and government of acting against Punjab's interests. Apparently, the intent is to incite hostility, spread separatist propaganda, and promote the Khalistan agenda. However, the accused could not be identified and an untrace report was filed on December 16, 2023.

FIR No. 52/2021, PS Cyber Crime, Gurugram, involves another audio-video message allegedly issued by Gurpatwant Singh Pannun, accusing Haryana government and people of working against interests of Punjab. The message aims to provoke discord and further the Khalistan movement. The accused could not be traced, and an untrace report was filed on December 16, 2023.

(iv) **PW-19 Simranjit Singh Lang (P.P.S.)**, Deputy Superintendent of Police, State Cyber Division, Punjab with reference to **FIR No. 12/2020**, PS: Punjab State Cyber Crime deposed that FIR was registered on secret information that Gurpatwant Singh Pannun is actively pursuing the secessionist and anti national agenda through social media during COVID-19 pandemic. The concerned videos were downloaded on CD **Exhibit PW-19/P2** along with screenshots of Facebook account **Exhibit PW-19/P4**. To trace the origins and activities of the associated Facebook accounts, the Mutual Legal Assistance Treaty (MLAT) process was initiated between India and the USA and the case is under investigation.

(v) **PW-24 Rajesh Kumar Mohan**, Assistant Superintendent of Police, Hisar, Haryana with reference to **FIR No. 31/2022**, PS: Cyber Crime, Police Station, Hisar deposed that FIR was registered on a complaint that video with the thumbnail "*Khalistan Flag Raised – Rail Clippers Removed – Rajiv Gandhi Thermal Plant Haryana – 15 August – Plunge India to Darkness.*" was being circulated on social media. In the video, Gurpatwant Singh Pannun, Chief of Sikhs for Justice (SFJ), claimed responsibility for sabotaging railway tracks near the Rajiv Gandhi Thermal Plant in Haryana. Since the accused could not be traced, a Special Investigation Team (SIT) was subsequently formed by the then Superintendent of Police, Hisar, to continue the investigation.

(vi) **PW-30 Dr. Amar Singh**, Inspector, officiating SHO, PS: Cyber Crime, CID, Shimla deposed with reference to **FIR No. 04/2021**, PS: Cyber Crime, CID, Shimla. This case pertains to threatening calls and audio messages allegedly sent by Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). The messages intended to disrupt Independence Day celebrations on August 15, 2021, in Himachal Pradesh, by threatening the then Chief Minister Jai Ram Thakur and other political figures. The content of the messages advocated for the Khalistan agenda and sought to prevent the hoisting of the Indian Tricolor. Pannun claimed Himachal Pradesh was historically a part of Punjab and would be included in Khalistan after Punjab's "liberation." Farmers and pro-Khalistan supporters were called upon to bring tractors to stop the Chief Minister from hoisting the national flag. He also threatened the BJP President Shri J.P. Nadda and warned people to stay indoors on Independence Day, as the Khalistan movement would disrupt celebrations. The State Forensic Science Laboratory (SFSL) report confirmed that the questioned voice in the threatening audio messages matched the admitted voice of Pannun. A Final Report/Untrace Report has been prepared and filed before the concerned Court, which is pending consideration.

(vii) **PW 31 Pranab Kumar Pegu**, Additional Superintendent of Police, STF Assam, Guwahati testified with reference to **FIR No. 02/2023** and **FIR No. 03/2023**, both registered at Police Station Special Task Force (STF), Assam, District- Kamrup (M), Assam.

FIR No. 02/2023 pertains to a threatening audio message (**Exhibit PW-31/P9**) allegedly circulated by Gurpatwant Singh Pannun, Chief of the banned organization Sikhs for Justice (SFJ). The audio message was disseminated widely on social media and news channels, promoting secessionist activities and issuing a life threat to the Chief Minister of Assam, Dr. Himanta Biswa Sarma. The audio message declared SFJ's objective of separating Punjab from India and re-establishing Khalistan. It called on Sikhs to fight against the Indian State and revive the terrorist activities of the 1980s and 1990s. The message explicitly warned Dr. Himanta

Biswa Sarma, accusing his government of torturing and harassing Sikhs and held him personally accountable for such actions. The FIR is still under investigation.

FIR No. 03/2023 pertains to a threatening audio message allegedly circulated by Gurpatwant Singh Pannun. The message, which went viral on social media and news channels, contains secessionist propaganda, threats against public figures, and calls for anti-India activities. The message specifically names Dr. Himanta Biswa Sarma, Chief Minister of Assam, accusing him of allying with enemies of Khalistan and holding him accountable for actions against pro-Khalistan Sikhs. It also includes a threat to hold Hon'ble Prime Minister, Shri Narendra Modi accountable during his visit to Sydney, Australia, on May 23, 2024, for alleged crimes against pro-Khalistan Sikhs. Pannun further calls for the liberation of Punjab and dismantling of the Indian political system. Reference is also made by him to other incidents, including assassinations of ex-Punjab CM, Shri Beant Singh and former Prime Minister, Smt. Indira Gandhi, to bolster the Khalistan narrative. Pannun urges the imprisoned Sikhs in Dibrugarh to commemorate April 29 as Khalistan Declaration Day by raising slogans such as "Khalistan Zindabad." The investigation in the case is still underway.

(viii) PW 40 Harwinder Pal Singh, DSP/SSOC/Amritsar deposed with reference to **FIR No. 6/2020** registered at SSOC/AMRITSAR. He testified that the case pertains to a pre-recorded audio message (**Exhibit PW-40/P8**) allegedly sent by Gurpatwant Singh Pannun, General Counsel of the banned organization Sikhs for Justice (SFJ). The message was sent from an international number (+18336101020, originating from North America) to DSP Rakesh Kumar Yadav. It sought to incite unrest among Punjab's youth and promote separatist sentiments during the COVID-19 lockdown. The message alleged that the Central and Punjab Government were using the lockdown as a means to "torture" Punjab's youth. It called for secession of Punjab from the Union of India, advocating the Khalistan agenda. The message was aimed at exploiting the vulnerabilities of Punjab's youth during the COVID-19 pandemic, fostering unrest and anti-government sentiments. During the investigation of the case, Pannun has been declared a proclaimed offender and chargesheet is yet to be filed.

(ix) PW 42 Jitendra M. Yadav, Deputy Superintendent of Police, Sabarmati Central Jail, Ahmedabad, Gujarat testified with reference to **FIR No. 11191067230030/2023** and **FIR No. 11191067230127/2023**, both registered at PS: Cyber Crime, Ahmedabad City.

PW-42 testified that **FIR No. 11191067230030/2023**, pertains to threatening pre-recorded voice messages allegedly disseminated by Sikhs for Justice (SFJ) and attributed to its General Counsel, Gurpatwant Singh Pannun. The case revolves around these messages, which threatened disruption and posed a security risk ahead of the India-Australia Test Match at the Narendra Modi Cricket Stadium in Ahmedabad on March 9, 2023. The voice messages claimed that Pro-Khalistan Sikhs would storm the stadium, raise Khalistan flags, and disrupt the event. The messages included warnings to Gujarat residents to stay home to avoid harm and stating that a clash between pro-Khalistan groups and Indian police was imminent. The messages accused Hon'ble Prime Minister, Shri Narendra Modi of responsibility for the deaths of Sikh farmers in Punjab and Muslims during the 2002 Gujarat riots. The messages openly advocated for Khalistan, declaring that Khalistan flags would be installed at the stadium as a demonstration of the movement's reach and intent.

Investigation revealed that Rahul Kumar ran an illegal GSM Gateway setup for relaying Voice Over Internet Protocol (VOIP) calls, including the threatening pre-recorded voice clips. Narendra Kumar Kushwaha – childhood friend of Rahul Kumar was a co-conspirator in the illegal VOIP business and assisted in setting up and operating GSM Gateways for transmitting the voice messages. Ummed Ansari was engaged in running an illegal GSM Gateway after responding to a work-from-home job post on Facebook and he received equipment from a person named Ahmed in Dubai and relayed the threatening messages through his setup. Mashid Khan further operated illegal GSM Gateways from his house in Bhiwandi, Maharashtra, installed by absconding accused Abu Bakar Shakil Ahmed Qureshi. The setup included multiple GSM Gateways, routers, SIM cards, and other equipment used for transmitting the calls. Further Mohammad Sahid was involved in operating a GSM Gateway setup for VOIP calls and played a role in transmitting the voice clips.

Rahul Kumar, Narendra Kumar, Ummed Ansari, Mashid Khan and Mohammad Sahid are stated to be in custody.

In addition, Gurpatwant Singh Pannun is identified as the originator of the threatening voice messages and has been declared absconding co-accused in the chargesheet, Mohsin and Abu Bakar Shakil Ahmed Qureshi are also named as co-accused and are yet to be apprehended.

(x) With reference to **FIR No. 11191067230127/2023**, PW-42 deposed that this case arose since several persons in Ahmedabad reported receiving a threatening pre-recorded audio message from an international number (+447418343648), ahead of India-Pakistan World Cup match at the Narendra Modi Stadium on October 5, 2023. The audio message, attributed to Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), declared that the event would not mark the beginning of the World Cricket Cup but the start of a "World Terror Cup." The message threatened to storm Ahmedabad with Khalistan flags and take revenge in retaliation to assassination of Shaheed Nijjar. The threatening tone and timing of the message was intended to disrupt the international sporting event and instill fear among the public. During investigation, it was revealed that the calls were routed through International Long Distance (ILD) carriers operated by Quicom Telecom Limited (Hong Kong) and Dexatel OU (Estonia). Despite technical analysis, no further details about the user of the phone number could be obtained and Final Report was accordingly filed in court on April 3, 2023.

(xi) **PW-44 Manoj Kumar Katyal**, Additional Superintendent of Police, PTC, Narendra Nagar, Uttarakhand deposed with reference to **FIR No. 299/2018** PS: Khatima, District: Udham Singh Nagar and **FIR No. 134/2023**, PS: Ramnagar, District-Nainital, Uttarakhand.

FIR No. 299/2018 pertains to the alleged misuse of cyberspace by members of the banned organization Sikhs for Justice (SFJ) to promote pro-Khalistani propaganda. The FIR was initiated on information that SFJ is radicalizing youth in Sikh-populated areas of Village Jadhapur, Khatima, through WhatsApp and social media platforms. Investigation revealed that Harjeet Singh @ Bobby Bhinder, the admin of a WhatsApp group named '20-20 Khalistan Referendum,' had been actively involved in promoting Khalistan ideology. The group, created on June 3, 2016, contained 40-50 members and shared content linked to secessionist activities. It was further revealed that Kulwinder Singh was the Creator of the WhatsApp Group and had also created the '20-20 Khalistan Referendum' group on June 3, 2016 and was inspired by

videos sent to him via WhatsApp from the Chief Organizer of an Active Sikh Organization linked to the 1984 riots. He used these materials to propagate Khalistan-related ideologies. The screenshots of WhatsApp group **Exhibit PW-44/P21** along with mobile phones recovered from accused *vide Exhibit PW-44/P26* corroborate the Khalistan agenda of SFJ. Both accused were arrested and are facing trial. The charge has been framed against the accused.

PW-44 further deposed that **FIR No. 134/2023** pertains to threatening pre-recorded audio messages **Exhibit PW-44/P8** allegedly disseminated by Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ), which were received by SHO Ramnagar. The messages claimed Ramnagar as part of Khalistan and threatened to disrupt the G-20 Conference, scheduled from March 28 to March 30, 2023, by raising Khalistan flags at prominent locations, including the airport and railway station. The messages asserted that Ramnagar is Khalistan and threatened to raise Khalistan flags during the summit. The audio warned Chief Minister of Uttarakhand, holding him accountable for actions against Sikhs in Uttarakhand and liberation of Punjab. The investigation in the case is ongoing.

(xii) PW-48, Pramod Kumar Mishra, Deputy Superintendent of Police, Hatia, Ranchi, Jharkhand testified with reference to **FIR No. 69/2024** PS: Dhurva, Ranchi. He deposed that this case pertains to a video allegedly uploaded on YouTube by Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ). The video called upon the banned organization CPI (Maoists) to disrupt the India-England cricket test match scheduled at JSCA Stadium, Ranchi, from February 23 to 27, 2024. The video contained threats aimed at the Indian Cricket Team Captain, Rohit Sharma, and England Cricket Team Captain, Ben Stokes, intending to instill fear among the public, disrupt the match, and tarnish India's image internationally. The video called for joint actions by SFJ and CPI (Maoists) to create disturbances in Jharkhand and Punjab. Direct threats were made to the cricket players namely Rohit Sharma and Ben Stokes, escalating fears of violence at the match venue. The actions were designed to harm India's reputation on an international platform, disrupt a globally viewed sporting event, and cause financial losses to the Government of India and BCCI. The case is under investigation.

(xiii) PW-49 Talwinder Singh Gill, Deputy Superintendent of Police (Detective), SAS Nagar, Punjab testified with reference to **FIR No. 43/2020**, PS: Sadar Kurali. He deposed that the case concerns the dissemination of automated pre-recorded audio messages attributed to Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ). These messages called for the secession of Punjab from India and sought to incite Sikh personnel in the Indian Armed Forces to abandon their duties. Pannun urged Sikh soldiers not to sacrifice their lives for India, alleging that the country has committed genocide of Sikhs. He offered monetary incentives, including salary equivalent to their army pay and an additional ₹5,000, as a lure to leave the armed forces. The timing of these messages, coinciding with national mourning over the loss of soldiers in the Galwan Valley has been seen as an attempt to mock their sacrifices and sow disaffection among Sikh soldiers. Pannun also circulated letters and messages thanking China for supporting SFJ's Referendum 2020 and called for voter registration to begin on July 4, 2020. Additionally, an unidentified female caller, claiming to be from China and supporting SFJ, urged Punjabis to participate in the referendum and alleged that India was destroying the Sikh religion. The investigation revealed that SFJ, a US-based banned organization, was

engaged in activities aimed at destabilizing India's peace, unity, and territorial integrity by exploiting social and religious sentiments. Pre-recorded audio messages and a video (**Exhibit PW-49/P15**) inciting Sikh personnel were seized as evidence. The case is under investigation.

(xiv) PW-51 Varun Singla, Superintendent of Police, Kurukshetra, Haryana deposed with reference to **FIR No. 597/2020**, PS: Thanesar City, District Kurukshetra. PW-51 testified that this case was based on a secret information about pre-recorded calls from the USA containing messages from Gurpatwant Singh Pannun, General Counsel of Sikhs for Justice (SFJ). The message claimed that Haryana is part of an independent Punjab following a so-called referendum and blamed the Haryana government and its people for acting against the interests of Sikhs and Punjabis. In the recording, Pannun asserted that Haryana would be integrated into an independent Punjab, giving the people of Haryana the choice to join Punjab or move to other parts of India. He also incited Sikhs in Haryana to participate in the referendum and encouraged voter registration at Gurudwara 6th Patshahi, Kurukshetra, on July 11, 2020. Efforts to trace the origin of the pre-recorded messages did not succeed and consequently, an Untrace Report was prepared with the provision that the investigation would be reopened if any new evidence or information emerges in future.

140. Cases of pro- Khalistani graffiti painted on multiple public premises.

(i) Testimony of PW-02 Shri Sanjay Dutt, Assistant Commissioner of Police, Special Cell, South Western Range, Janakpuri, Delhi Police, New Delhi in FIR No. 697/2023 dated 28.08.2023, P.S. Nangloi, New Delhi reflects that aforesaid case was registered shortly before the G-20 Summit in India, since several instances of pro-Khalistani graffiti were discovered at multiple locations i.e. on the wall of Surajmal Stadium and Wall of the Rajkiya Sarvodaya Kanya Vidhalaya, Nangloi, New Delhi. The graffiti included slogans such as "*KHALISTAN ZINDABAAD*" and "*KHALISTAN IS OPINION NOT TERRORISM SFJ*". During investigation, two suspects, Pritpal Singh and Rajvinder Singh @ Kala were arrested on 31.08.2023, by the Special Cell team of Janakpuri, New Delhi, who admitted their involvement in painting the pro-Khalistani slogans at various locations in Delhi on 26.08.2023. Further, they stated that they carried out this act on the instructions of Gurpatwant Singh Pannun, leader of Sikhs for Justice (SFJ), who paid them INR 2,00,000/- for the task. During search of accused Pritpal's residence, ₹2 lakh in cash was recovered which allegedly was received from SFJ Leader Gurpatwant Singh Pannun. During course of the investigation, analysis of mobile phone of accused Pritpal revealed various chats, videos and audio notes exchanges between him and Gurpatwant Singh Pannun *via* Signal App. Further, a contact saved in Pritpal's phone, labelled as "NRI Pannu," was identified as Gurpatwant Singh Pannun. Chargesheet against accused Pritpal Singh and Rajvinder Singh stands filed on 28.11.2023 and case is pending at the stage of framing of charge.

(ii) Testimony of PW-41 Babulal Meena, Additional Superintendent of Police, GRP Circle Bikaner, District GRP Jodhpur (Rajasthan) in FIR No. 56/2023 dated 24.10.2023, P.S. GRP, Hanumangarh, District GRP (N), Jodhpur (Rajasthan) reflects that aforesaid case was registered since 'Khalistan Zindabad SFJ' was found written in English by some unknown persons above Hanumangarh Railway Junction box. During course of investigation, it was revealed that accused Love Preet Singh and Harman Preet Singh involved in

FIR No.233/2023, had admitted that they had written 'Khalistan Zindabad SFJ' at Hanumangarh Junction, and a plastic bag containing 3 spray cans and a saffron cloth was also recovered on which 'Khalistan Zindabad SFJ' was written. Both the accused were arrested. Investigation further revealed that accused had participated in pro-Khalistani activities as they received monetary gain in return. The investigation in the case is pending.

141. Evidence of weapons recovered to re-activate terrorism in Punjab

(i) **PW-8 Sarabjit Singh**, Superintendent of Police (Investigation), Hoshiarpur, Punjab deposed that FIR No. 93/2016, dated 06.08.2016 Police Station Chabbewal, Hoshiarpur was registered after information was received that Harjap Singh resident of Bhilowal, currently in USA and Avtar Singh @ Darshan Singh resident of Chakkowal Shekhan, currently in Italy, members of the Khalistan Liberation Force, were disseminating false narratives among vulnerable individuals in Punjab and attempting to revive terrorism in the state by providing financial support to recruit young people and procure weapons. Investigation revealed that Jaspreet @ Jassa, Hardeep Singh @ Deepa, Kuldeep Singh @ Deep and Bikramjeet Singh were in contact with Balwinder Singh@ Bittu and acting on instructions from Harjap Singh and Avtar Singh conveyed via Internet. The accused were directed to procure weapons, ammunition and explosives to carry out a significant act of violence. 40 live cartridges from Bikramjeet Singh, ten shirts printed with "Punjab Independence Day Referendum 2020," and 200 grams of sulfur (gandhak) potash from Kuldeep Singh were recovered. Additionally, a motorcycle, books, a pistol and five shirts with similar slogans were recovered from Hardeep Singh. Accused Jaspreet Singh @ Jassa and Hardeep Singh @ Deepa, were convicted under Section 25 of the Arms Act. Kuldeep Singh @ Deep, was convicted under Section 9B of the Explosives Act, 1884, on 03.04.2019. Look out circulars stand issued against accused Harjap Singh and Avtar Singh.

(ii) **PW-33 Shri Gurpartap Singh Sahota**, PPS, Superintendent of Police (Investigation), Batala, District Gurdaspur, Punjab, deposed that FIR No. 46/2018 dated 31.05.2018 was registered at P.S. Rangar, Nangal after a wine shop was set to fire causing damage to the property. Two accused namely Dharminder Singh who was on leave from his duties in the army, and Kirpal Singh were arrested. During search 0.22 bore pistol with three live rounds of 0.32 bore ammunition, a 0.32 bore revolver with three live rounds of 0.32 bore ammunition, two rounds of 0.315 bore ammunition, ₹40,000 in cash, 110 posters labelled "*Sikhs for Justice*", three stencils with "Khalistan Zindabad", a board and fiber sheet reading "Punjab Referendum 2020", as well as spray cans, brushes, and two mobile phones were recovered. The accused admitted having been in contact with Maan Singh Khalsa, a resident of the UK, who instructed them to paste Khalistan-related posters and carry out unlawful acts like arson. Accused Dharminder also disclosed that Pannun, along with Parmjit Singh Pamma (UK) and Deep Kaur (Malaysia), encouraged arson attacks and planned targeted killings to disrupt law and order in Punjab. He disclosed that they were specifically directed to target Hindu Shiv Sena leaders, RSS shakhas, and other organizations opposed to Khalistan. It also came up in investigation that Pannun and his associates provided financial support and weapons to carry out these activities. Further, the call detail records revealed that accused Dharminder Singh was part of 36 whatsapp groups involving members from India and abroad including from Babbar Khalsa and other radical

organizations. Investigation also revealed plans to assassinate prominent individuals including Sudhir Kumar Suri Hindu, President Shiv Sena and other leaders such as Navdeep Gupta (Kharar) Chandrakant Chadha (Ludhiana) and Ranjeet Kumar (Gurdaspur). The directives were issued vide leaders of Babbar Khalsa International and Khalistan Referendum 2020. Gurpatwant Singh Pannun, Parmjit Singh Pamma, and others were named as accused in the above mentioned case. Further, Gurpatwant Singh Pannun has been placed in Column No.3 which stands filed against the accused.

(iii) PW-27 Shri Mohit Handa, Deputy Commissioner of Police, Crime, Gurugram deposed with reference to FIR No.972/2020 dated 23.12.2020 registered at P.S. Sadar Karnal. He testified that two accused, namely Tej Prakash and Akash Deep, were arrested along with ammunition in their possession. During the course of investigation, accused Tej Prakash disclosed that he was in contact with one Gurmeet Singh who had instructed him to murder one Sudhir Suri and Gursharan Mandr due to their alleged statements against his religion. Further, some money was also stated to have been received from Gurmeet Singh, which was used to purchase mobile phones and weapons after filing of chargesheet. Charge against the accused has been framed by the Trial Court and the matter is pending for prosecution evidence.

142. Case where Khalistani flags were hoisted and graffiti painted on public premises.

PW-37 Shri Surinder Singh Bhoria, Superintendent of Police, Ambala, Haryana, deposed that FIR No. 71/2023 dated 04.03.2023, P.S. Ambala Sadar, Ambala, was registered since a yellow cloth tied to a wooden stick resembling a flag was seen on the Rajpura Flyover attached to the cement railing. The cloth had words “SFJ, KHALISTAN” written in English with black ink. Further, “KHALISTAN G20 FORGION MINISTOR WELCOME” was also found written in English with black ink on the wall of the bridge. Despite investigation, the identity of the accused could not be ascertained and, therefore, an Untrace Report dated 25.10.2024 was filed before the Trial Court.

143. Cases where graffiti was painted on public premises and have been proved by PW-1, PW-2, PW-12, PW-21, PW-22, PW-23, PW-25, PW-27, PW-33, PW-35, PW-36, PW-39, PW-46 & PW-49

(i) **PW-1 Ved Prakash**, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi Police, Delhi testified with reference to FIR No. 47/2024, P.S. Uttam Nagar and FIR No. 106/2024, P.S. Nihal Vihar.

As per testimony of PW-1, **FIR No. 47/2024, Police Station Uttam Nagar**, pertains to pro-Khalistan graffiti reading "KHALISTAN ZINDABAD" painted on the wall of the Government Sarvodaya Bal Vidyalaya, Uttam Nagar. The graffiti was linked to secessionist propaganda promoting the creation of Khalistan. During investigation, Sanny Singh alias Sunny was arrested who disclosed that he painted the graffiti under the instructions of Gagandeep Singh, residing in USA and was associated with Gurpatwant Singh Pannun and Sikhs for Justice (SFJ). Further, it was revealed that Sanny Singh received Rs. 30,000 through Muthoot Finance, transferred on behalf of Gagandeep Singh, to carry out this anti-national activity.

Relevant payment records, including the transaction receipt from Muthoot Finance, were recovered during investigation. Accused Sanny Singh alias Sunny is in custody and the case is under investigation.

With reference to **FIR No. 106/2024, Police Station Nihal Vihar**, PW-1 testified with the case pertains to pro-Khalistan graffiti reading "26 JANUARY SFJ KHALISTAN VOTER REGISTRATION" painted on a wall along a drain in the jurisdiction of Nihal Vihar Police Station. During investigation, Sanny Singh alias Sunny was arrested in connection with this case as well. He confessed that he painted the graffiti following directions from Gagandeep Singh. Similar to FIR No. 47/2024, Sanny Singh admitted receiving of Rs.30,000 through Muthoot Finance, a payment made at the instructions of Gagandeep Singh. Payment verification and transaction records were collected as evidence. Sanny Singh alias Sunny is in custody and the case is under investigation.

(ii) **PW-2 Sanjay Dutt**, Assistant Commissioner of Police, Special Cell, South Western Range, Janakpuri, Delhi Police, New Delhi deposed with reference to FIR No. 705/2023, P.S. Kashmiri Gate, FIR No. 28/2023, P.S. Nangloi Metro State, FIR No. 75/2024, P.S. Tilak Nagar and FIR No.469/2023, P.S. Hari Nagar.

FIR No. 705/2023, PS- Kashmiri Gate, New Delhi, pertains to graffiti reading "DELHI Banayga Khalistan SFJ" & "KHALISTAN ZINDABAD SFJ", which was found under Yudhister Setu Flyover near Metro Gate No. 5 & 6, Kashmere Gate, Delhi. Malak Singh, alias Malik, was arrested and he disclosed that he wrote these slogans under the direction of Gurpatwant Singh Pannun, leader of Sikhs for Justice (SFJ). Investigation revealed that Malak Singh communicated with Pannun via Signal App. A mobile phone containing incriminating evidence was recovered, and his voice samples were sent for forensic analysis. Malak Singh is in judicial custody and chargesheet has been filed.

FIR No. 28/2023, PS Nangloi Metro Station, New Delhi: As per the FIR, graffiti with slogans such as "G-20 PUNJAB IS NOT INDIA KHALISTAN SFJ ZINDABAD", "DELHI BANEGA KHALISTAN SFJ", "MODI INDIA'S COMMITTED GENOCIDE OF SIKHS SFJ", "G-20 PUNJAB IS NOT INDIA-SFJ", "KHALISTAN REFERENDOM ZINDABAAD-SFJ" were observed across the Metro Stations in Delhi. PW-2 testified that Pritpal Singh and Rajvinder Singh were arrested and admitted to writing the slogans on instructions from Gurpatwant Singh Pannun for monetary compensation. Their mobile phone data revealed chats and media exchanges with Pannun. Rs.2 lakh alleged to be paid by Pannun was recovered from Pritpal's residence. Accused Pritpal Singh and Rajvinder Singh are in judicial custody and chargesheet has been filed.

FIR No. 75/2024, PS Tilak Nagar Delhi concerns graffiti reading "DELHI BANEGA KHALISTAN" found on the wall of a park in Tilak Nagar, Delhi. PW-2 testified that Jasvinder Singh, who admitted to painting the slogans at the behest of Gagandeep Singh (based in the USA), was arrested. A spray bottle used for graffiti was seized, and evidence revealed that Jasvinder created a video of the act and sent it to Gagandeep Singh. Jasvinder Singh is in judicial custody and chargesheet has been filed in the said case

FIR No. 469/2023 PS Hari Nagar, Delhi involves graffiti with the message "KHAL 24 SFJ 26 JAN" found on a metro pillar near Tilak Nagar Metro Station. PW-2 testified that accused, Lakhminder Singh alias

Laddu, was identified through CCTV footage but fled the country after the incident. A Look-Out Circular (LOC) has been issued against accused Lakhminder Singh who is absconding.

The investigation is still underway and chargesheet is yet to be filed.

(iii) **PW 12 Pawanjit**, Additional Deputy Commissioner of Police, Ludhiana deposed that FIR No. 154/2021 was registered at Police Station Dehlon, Ludhiana, on observing pro-Khalistan graffiti on roads and walls in Village Gill, Ludhiana. The graffiti, including messages like “KHALISTAN ZINDABAD” and “KISANA DA HAL, KHALISTAN,” promoted secessionist propaganda and instigated communal tension among the Hindu community. He further testified that during investigation, it was revealed that the accused, Gurvinder Singh alias Baba and a child in conflict with law (CCL), acted on the directions of Gurpatwant Singh Pannun, associated with the banned organization Sikhs for Justice (SFJ). Pannun allegedly financed these acts to disrupt peace in Punjab and promote anti-national activities. On September 19, 2021, the CCL was apprehended. A challan was filed against him and is currently on bail and the case under trial before the Juvenile Board. He further deposed that co-accused Gurvinder Singh alias Baba was also arrested and is in custody. The case is pending trial in the court of Additional Sessions Judge, Ludhiana.

(iv) **PW-21 Ms. Anita Saini**, Deputy Superintendent of Police/Admin/GRP/Punjab deposed that FIR No. 119/2023 was registered at Police Station Govt. Railway Police, Amritsar (Punjab). The case pertains to a video uploaded by Gurpatwant Singh Pannun, President of the banned organization Sikhs for Justice (SFJ). The video, circulated on platforms like Facebook and WhatsApp, displayed the slogans “Khalistan Zindabad” and “Boycott of AIR INDIA” inscribed with black ink on the pillars and walls of a new overbridge located between Railway Stations Amritsar and Manawala (at KM No. 510/34). The video aimed to incite secessionist sentiments and disrupt public harmony. On investigation, a chargesheet was filed on April 30, 2024, in the Court of Chief Judicial Magistrate (CJM), Amritsar against Harmanpreet Singh and Lovepreet Singh. The court framed charge and the case is scheduled for prosecution evidence.

(v) **PW 22 Kuldip Singh**, Sub-Inspector In-charge, Police Post, Sector-43, Chandigarh deposed that FIR No. 51/2023 registered at Police Station Sector-36, Chandigarh, pertains to the defacement of public property near the Beant Singh Memorial, Sector-42, Chandigarh. The display board of the memorial was inscribed with slogans “SFJ Jindabaad” and “Khalistan Jindabad” by unidentified individuals. Despite investigation, the accused could not be identified or apprehended and consequently, an Untrace Report was filed.

(vi) **PW 23 Adarshdeep Singh**, Deputy Superintendent of Police, Sirsa, Haryana testified that FIR No. 148/2023, registered at Police Station Sirsa Sadar, pertains to anti-India slogans related to the Khalistani movement being inscribed on the wall of the Airforce Station, Sirsa. The slogans, written in both English and Punjabi, included "Hindustan Murdabad," "SFJ," "G-20, Delhi 100,000 Dollar," "Khalistani Flag, Pragati Maidan," and "Khalistan Zindabad." The investigation did not lead to the identification or apprehension of any suspects and consequently, an Untrace Report was filed on August 30, 2023,

(vii) **PW 25 Ms. Deepti Garg**, Superintendent of Police, Dabwali (presently posted as Commandant of 4th Battalion, IRB, Manesar, Gurugram testified with reference to FIR No. 627/2022 and 473/2023 both registered at Police Station City Mandi Dabwali.

PW 25 deposed that FIR No. 627/2022, registered at Police Station City Mandi Dabwali, pertains to anti-national slogans written on the wall of B.R. Ambedkar College, Dabwali. The slogans, written in both English and Punjabi, included phrases such as "BRAHMINES LEAVE PUNJAB-HR, HARYANA BANEGA KHALISTAN," "BRAHMINS HINDU RESPONSE 1984 SIKH GENOCIDE," "SFJ," "KHALISTAN ZINDABAD," along with the date "29 JANUARY" (in Punjabi) and "AUSTRALIA" (in English). These inscriptions were attributed to Gurpatwant Singh Pannu and others, aiming to incite anti-national sentiments and disrupt communal harmony. Despite investigation, the accused could not be identified and as such, an Untrace Report dated September 5, 2023, was prepared, but is yet to be submitted in the court.

She further testified that FIR No. 473/2023, pertains to anti-national slogans found on the walls of the Sub-Divisional Magistrate's office. The slogans, written in English and Punjabi, included phrases like "HARYANA KHALISTAN," "KHALISTAN ZINDABAD," "KHALISTAN HARYANA BANEGA, SFJ KHALISTAN, MODI, KHATTAR, VIZ, SFJ THOKO," "KHALISTAN BATEGA-HR," "HARYANA BANEGA KHALISTAN," and "KHALISTAN SFJ." Despite extensive investigation, accused could not be identified or apprehended and an Untrace Report dated June 17, 2024, was prepared but is yet to be filed in court.

(viii) **PW 27 Mohit Handa**, Deputy Commissioner of Police, Crime, Gurugram deposed that FIR No. 414/2022, Police Station Civil Lines, Karnal, pertains to pro-Khalistani slogans such as "Haryana Banega Khalistan" (in Punjabi) and "SFJ Har Banega Khalistan SFJ" (in English) being painted on the walls of Dayal Singh College and DAV School. During investigation, accused Manjeet Singh was arrested and he admitted to writing the slogans and expressed allegiance to Gurpatwant Singh Pannun. He also implicated Resham Singh in the act. Subsequently, accused Resham Singh was arrested and in his disclosure statement, he confirmed his involvement and collaboration with Manjeet Singh in painting the slogans. Chargesheet was filed before the concerned court and the case is currently pending trial.

(ix) **PW 33 Gurpartap Singh Sahota**, PPS, Superintendent of Police, Investigation Batala, District Gurdaspur, Punjab deposed that FIR No. 77/2022 was registered at Police Station Dera Baba Nanak following a report by the SHO regarding provocative posters found pasted on the outer wall of the SDM Office and a pillar at the Bus Stand in Dera Baba Nanak. These posters, written in Punjabi, carried messages such as "Khalsa Raj Saint Baba Jarnail Singh Bhindranwale is Punjab's true claim. Long live Khalistan, down with Hindustan. The Sikh community is alive and will seek revenge." The posters were instigated by Gurpatwant Singh Pannun, Chief of Sikhs for Justice (SFJ), and seen as an attempt to incite hatred, disturb public harmony, and undermine the unity and integrity of India. The case is under investigation.

(x) **PW 35 Lavdeep Singh Gill**, PPS, Deputy Superintendent of Police, Detection, District Moga, Punjab, India deposed that FIR No. 124/2023, Police Station Moga, Punjab was registered since slogans such as "Khalistan Jindabad" were found written on the walls of the bathroom and ticket counter of Bus Stand Moga. Additionally, a saffron-colored flag with the word "Khalistan" on one side and a Khanda symbol on the other side was hoisted on the ticket counter. These acts, committed by unknown individuals, were perceived as an attempt to incite hatred, disrupt unity, and create animosity among citizens. During

investigation, Pritpal Singh and Daljit Singh were arrested. Based on Pritpal Singh's disclosure statement, Gurpatwant Singh Pannun, the Chief of Sikhs for Justice (SFJ), was also named as an accused in the case. The chargesheet was filed before the Judicial Magistrate Ist Class, Moga, who has since taken cognizance of the case.

(xi) **PW 36 Jasbir Singh**, Superintendent of Police, Special Branch, District Patiala deposed that FIR No. 144/2021 Police Station Banur, District Patiala was registered on a secret information received by SHO, Police Station Banur. The secret information revealed that Jagmeet Singh, Ravinder Singh, and Jasvir Kaur were propagating pro-Khalistan sentiments by distributing registration forms for voting, pasting posters, and raising slogans in favor of Khalistan at public and religious places. Their actions were aimed at inciting innocent people to support the secessionist movement. Based on this intelligence, the police conducted nakabandi (blockade) and intercepted a motorcycle bearing registration No. PB-48-F-8245 near Banur. Ravinder Singh and Jagmeet Singh were apprehended, and a search led to the recovery of over 206 forms, posters, plastic plates, and spray paints advocating Khalistan. During interrogation, they disclosed that Jasvir Kaur, Jagmeet Singh's mother, motivated and supplied them with materials for their activities. Jasvir Kaur was subsequently apprehended, and 100 voter registration forms, along with other materials, were recovered at her instance. Investigation revealed that the accused were members of the banned organization Sikhs for Justice (SFJ), led by Gurpatwant Singh Pannun and were engaged in organized activities aimed at conducting a Khalistan referendum and inciting separatist sentiments to create a separate state. The materials recovered included 453 forms, 39 posters, and three spray paint bottles. A final report under Section 173 Cr.P.C. was submitted before the trial court against Jagmeet Singh, Ravinder Singh, and Jasvir Kaur. The charge against the accused was framed and the case is under trial.

(xii) **PW 39 Tejinder Pal Singh Brar**, PPS, Deputy Superintendent of Police, Sub Division, Abohar, Fazilka, Punjab testified that FIR No. 91, was registered at Police Station Sadar Abohar, District Fazilka, Punjab, following the discovery of anti-national pamphlets with pro-Khalistani slogans such as "Sikha De Sare Masle Khalistan Vich Hi Hal Honge" pasted on a water tank near Khalinda Ram Dhani. The pamphlets aimed to provoke communal disharmony and promote Khalistani ideology. During investigation, a pamphlet was recovered from the water tank, and based on the statement of Sukhdev Singh, several accused, including Surinder Kumar, Mandeep Singh @ Vakil Singh, Lakhwinder Singh @ Lakhi, Harvinder Singh, and Manpreet Singh, were nominated (named) in the case. A raid at Surinder Kumar's residence led to the recovery of ten Khalistani posters. Surinder Kumar confessed that he and others had affixed the Khalistani posters in the village. The confession also revealed communication among the accused regarding the posters. Since despite further investigation no incriminating evidence was found against other accused including Mandeep Singh @ Killa, Lakhwinder Singh @ Lakhi, Iqbal Singh @ Ivan, Harvinder Singh, and Manpreet Singh, chargesheet was filed only against Surinder Kumar. The charge was formally framed against him and the case is pending trial before the Judicial Magistrate Ist Class (JMIC), Abohar.

(xiii) **PW 46 Narayan Singh**, Station House Officer (SHO), PS Dharamshala, District Kangra, Himachal Pradesh deposed that FIR No. 230/2023 Police Station Dharamshala, District Kangra, Himachal Pradesh was initiated on the statement of Ashwani Kumar, who reported that on October 3, 2023, while on duty near the

office of the Executive Engineer, Jal Shakti Department, he observed a boy sitting near the road by a wall. Not suspecting any unlawful activity at the time, he and his colleague, Prakash Chand, proceeded to their offices. Later, Ashwani Kumar noticed the words "KHALISTAN ZINDABAD" written in English on the wall. The investigation included reviewing CCTV footage from the site, showed a person approaching the location where the writing was found. However, the suspect could not be identified. Consequently, an Untrace Report was prepared and filed before the Chief Judicial Magistrate, Kangra, who accepted it on October 5, 2024.

(xiv) **PW 49 Talwinder Singh Gill**, Deputy Superintendent of Police (Detective), SAS Nagar, Punjab deposed that FIR No. 149/2017 was registered at Police Station Sohana, District SAS Nagar on statement of CIA Incharge, Inspector Atul Soni, who reported the circulation of objectionable posters in Punjab. These posters contained slogans advocating Punjab independence and referred to events from 1984, along with images of Bhindranwale and the Akal Takht Sahib. One such poster was found affixed at CGC Landran, District Mohali, causing fear among the public. Several similar posters were reportedly placed near religious sites. The complainant attributed these acts to Gurpatwant Singh Pannun, Legal Advisor for Sikhs for Justice, along with Jagdeep Singh from Fatehgarh Sahib and Jagjit Singh from Jammu, both currently based in New York. The accused allegedly involved Harpuneet Singh from Nanak Nagar, Jammu and Gurpreet Singh, a printing press owner in Mohali, by misleading them into publishing and distributing the posters. Gurpreet Singh and Harpuneet Singh were arrested and chargesheet was filed against them, while steps are underway to declare Gurpatwant Singh Pannun, Jagdeep Singh, and Jagjit Singh, who reside in New York, as proclaimed offenders.

125. FIR No. 179/2020 was registered at PS: Special Cell, Delhi with reference to automated calls made by SFJ with recorded voice of Gurpatwant Singh Pannun propagating the hoisting of Khalistani flag on Red Fort, bringing down the national tricolor and instigating communal disturbance by promoting the pro-Khalistan Referendum-2020 agenda on social media.

PW-1 Ved Prakash, Assistant Commissioner of Police, Special Cell, Southern Range, Saket, Delhi Police, Delhi deposed that **FIR No. 179/2020** was registered at PS Special Cell, Delhi on a complaint by Sh. Puneet Singh Chandhok, who alleged that the organization "Sikhs for Justice" (SFJ), led by Gurpatwant Singh Pannun, was promoting pro-Khalistan and Referendum - 2020 agendas through social media. SFJ was accused of instigating insurgency and radicalizing youth in India through various online platforms, including Facebook, Twitter, VOIP, and YouTube. The complaint also highlighted automated calls with pre-recorded messages from Gurpatwant Singh Pannun, promoting the creation of Khalistan and encouraging actions like hoisting Khalistan flags at the Red Fort. The investigation revealed that these pre-recorded messages posed a serious threat to India's unity, integrity, and security. Voice analysis conducted by CFSL, Delhi, matched the recorded voice to Gurpatwant Singh Pannun. However, efforts to obtain further information from US-based social media platforms through mutual legal assistance were unsuccessful as the US authorities declined to share the details. The case is still under investigation.

126. PW-1 Ved Prakash deposed that **FIR No. 211/2021** was registered based on a secret input regarding a video posted on a Twitter handle, wherein SFJ General Counsel Gurpatwant Singh Pannun, offered a \$1 million reward to uniformed police personnel to prevent the Indian Prime Minister from hoisting the national flag at the Red Fort on August 15, 2021. The message propagated hatred against the Government of India, sought support for the secessionist agenda of SFJ, and attempted to incite disaffection among law enforcement agencies. The video messages were disseminated widely by various users, thereby promoting the SFJ agenda. Notices were served to social media platforms seeking user information, and a mutual legal assistance request was sent to U.S.-based platforms. However, the information from the U.S. platforms is still awaited. The investigation is still ongoing in the case.

144. FIR No. 7/2021, PS: SSOC (SAS Nagar) relating to posters of “Punjab Referendum 2020”.

PW-40 Mr. Harwinder Pal Singh, DSP/SSOC/Amritsar deposed that **FIR No. 7/2021**, registered at PS: SSOC (SAS Nagar), was initiated on secret information that Gurwinder Singh alias Baba, along with other accused, was involved in putting up posters in various districts of Punjab, such as Rupnagar, Mohali, Fatehgarh Sahib, Khanna, and Ludhiana. The posters carried messages supporting "Punjab Referendum 2020." It was revealed that these activities were orchestrated under instructions from Gurpatwant Singh Pannun and other individuals residing in the USA, including Harpreet Singh alias Rana, Bikramjit Singh, and Gursahai Singh Makhu, who provided financial and logistical support to further these anti-national activities.

During investigation, Gurwinder Singh disclosed that he had hidden frames for printing Khalistan posters, spray paints, and other objectionable materials in his farmland in Ludhiana. Recovery of the same was effected including Khalistani flags and posters. Photographic evidence and recovery memos were documented.

The chargesheet in the case was filed against several accused, including Gurwinder Singh alias Baba, Jagwinder Singh, Sukhdev Singh alias Rinku, and Jagjit Singh Mangat. Additionally, six individuals residing in the USA, namely, Gurpatwant Singh Pannun, Harpreet Singh alias Rana, Bikramjit Singh, Gursahai Singh Makhu, Rajinder Singh, and Kamal were named as accused but remain absconding. The case is currently pending trial and charge has been framed against the accused.

145. FIR No. 69/2022, Police Station E-Division, District Commissionerate Amritsar (Punjab) relating to promotion of “Khalistan Referendum” through circulation of videos on social media

PW-10 Navjot Singh, PPS, Additional Deputy Commissioner of Police, Investigation, Police Commissionerate, Amritsar, deposed that **FIR No. 69/2022** was registered at Police Station E-Division, District Commissionerate Amritsar (Punjab), stemming from a viral video circulated on social media in which a person is seen near the Nishan Sahib of Akal Takhat Sahib, delivering a speech in support of “Sikhs For Justice,” “Referendum Zindabad,” and “Khalistan Zindabad,” while another person listens in agreement. The content of the video was deemed inflammatory, capable of disturbing communal harmony, and as an attempt to wage war or abet waging of war against the Government of India.

Two individuals, Manjit Singh alias Baba Shaheed and Saudagar Singh, were arrested in connection with the said case. Two mobile phones were also recovered from them.

Chargesheet was accordingly filed. During trial accused Saudagar Singh is stated to have expired while trial is pending against Manjit Singh.

127. Cases relating to promotion of “Khalistan” with reference to **FIR No. 119/2022 and 73/2023** were testified by PW-5 and PW-21, as detailed under:-

(i) **PW-5 Manmohan Singh Aulakh**, PPS, Superintendent of Police, Investigation, District Mansa, Punjab testified with reference to **FIR No. 119/2022**, P.S. City Budhlada District Mansa. He deposed that the case was initiated on information received from a secret informer, who alerted the police about objectionable handwritten posters pasted on the railway flyover at Boha Road. The posters bore slogans such as “*Freedom 2020 Vote India Out of Khalistan, US Media International,*” promoting Khalistani sentiments and anti-India secessionist propaganda. Despite investigation, the accused could not be traced and consequently, an Untrace Report was filed in the court on September 9, 2023.

(ii) **PW-21 Ms. Anita Saini**, Deputy Superintendent of Police/Admin/ GRP/Punjab testified with reference to **FIR No. 73/2023**, registered at Police Station GRP Bathinda. She deposed that the case pertains to an incident involving the placement of posters and banners referencing the Khalistan Association at the Bathinda-Mansa Road underbridge. The case originated from an application filed by Advocate Sandeep Pathak of the Hindu Maha Gathbandan, Bathinda requesting action against those responsible for fixing the posters. During investigation, evidence and records of an interconnected **FIR No. 233/2023**, PS Canal Colony, Bathinda, provided leads. Based on this evidence, two accused were arrested. The case is under investigation.

146. FIR No. 42/2022, PS: Kalanaur relating to posters averring revenge by Sikh community and hailing Bhindranwala.

PW-4 Balwinder Singh Randhawa, PPS, Superintendent of Police, Investigation, District Gurdaspur, Punjab, deposed with reference to **FIR No. 42/2022, PS: Kalanaur**. He testified that the case originated from report by ASI Harminder Singh, who, during patrolling with other police officers, received secret information about handwritten publications in black marker pasted at several locations in Kalanaur. The posters contained the message: “Khalsa Raj Sant Baba Jarnail Singh Bhindranwala, the real right of Punjab, Khalistan Zindabad Hindustan Murdabad, the Sikh community will live and take revenge.” Police inspected the sites, took the posters in custody. However, despite efforts, the accused could not be traced and accordingly, an Untrace Report was filed.

147. Other cases wherein no direct connection of the offence with the SFJ or Gurpatwant Singh Pannun was established but have been relied as furthering the Khalistani cause.

(i) **PW-36 Jasbir Singh, Superintendent of Police, Special Branch, District Patiala**, deposed regarding **FIR No. 179/2018, PS: Sadar Samana, District Patiala and FIR No. 132/18, PS: Lahori Gate, Patiala.**

With reference to **FIR No. 179/2018 PS: Sadar Samana, District Patiala**, PW-36 deposed that the case emerged during investigation of FIR No. 47 dated February 27, 2018, registered under Section 392 IPC and Arms Act at Police Station Patran. Accused Jarman Singh disclosed that after committing a crime, he had hidden four weapons near Village Bizalpur. Based on his disclosure, the police recovered a 32-bore pistol, two country-made pistols of 315 bore, and a 315-bore rifle, leading to the registration of this FIR. The final report was accordingly submitted and accused Jarman Singh was convicted by the Court *vide* judgment dated February 3, 2024.

Learned ASG submits that it is believed that the crime for which Jarman Singh was convicted was committed to promote militancy in Punjab.

This Tribunal is of the opinion that the said FIR does not substantiate any link with SFJ in absence of any cogent evidence on record.

Further, with reference to **FIR No. 132/18, PS: Lahori Gate, Patiala**, PW-36 deposed that FIR originated from secret information received by DSP Sukhwinder Singh Chauhan, indicating that accused Sabnamdeep Singh was involved in terrorist activities as a member of the Khalistan Liberation Force (KLF). The information suggested that he was recruiting members for a new organization called the Khalistan Gadar Force, issuing press notes and threat letters on KLF letterheads, and receiving financial and logistical support from ISI, KLF operatives, and Babbar Khalsa. It was further alleged that Sabnamdeep Singh, in collaboration with his accomplices, was planning a bomb blast in a crowded area, potentially causing mass casualties, and was working to expand terrorist activities. Following the registration of the FIR, he was arrested on November 1, 2018. The police recovered a pistol with six live cartridges, a grenade, and letter pads associated with KLF and Babbar Khalsa International. During interrogation, additional accused Gursewak Singh, Ramesh Kumar, and Vinod Kumar were named, and Section 120-B IPC was added to the charges. On February 18, 2019, Harmeet Singh alias Meet alias PHD was also included as an accused. The final report under Section 173 Cr.P.C. was filed against accused individuals, including Sabnamdeep Singh, Ramesh Kumar, Vinod Kumar, and Jatinder Singh alias Binder, on April 26, 2019. Another accused, Kulwinderjit Singh, was declared a proclaimed offender on November 17, 2021, but was later arrested on April 4, 2024. The trial is ongoing, currently at the stage of defence evidence. Although the investigation did not establish a direct link between the accused and the banned organization Sikhs for Justice (SFJ) or its office bearers, learned ASG submits that the actions of the accused are believed to align with the militancy-promoting agenda of Gurpatwant Singh Pannun.

However, this Tribunal is of the opinion that in absence of any concrete evidence, it may be difficult to hold that the aforesaid FIR can be linked with the objectives of SFJ. As such, reliance is not placed by this Tribunal on the aforesaid two FIRs.

128. From the uncontroverted evidence led on behalf of Union of India, following inferences can be drawn:-

- (i) The Sikhs for Justice (SFJ) is a frontal organization of Gurpatwant Singh Pannun, who is using the said Juristic identity as a cover to perpetrate war upon India in league with other agencies and state-

and non-state actors of foreign countries. Behind the veil, SFJ seeks to revive militancy in State of Punjab advocating creation of separate Khalistan State. The motive and intention of the organization is to perpetrate and engineer acts of external aggression and internal armed rebellion under the artifice of the organization Sikhs for Justice (SFJ). For the aforesaid purpose, the intention to incite, radicalize and misuse a particular community, is apparent;

- (ii) The express admission of indulging into secessionist activities by SFJ and Gurpatwant Singh Pannun is manifest from the propaganda videos and audio messages circulated and broadcasted on social media websites wherein Gurpatwant Singh Pannun has expressly taken the responsibility of the unlawful/secessionist activities committed by the cadres working at behest of SFJ in India;
- (iii) The association has shown no signs of deterrence despite being declared as an Unlawful Association in 2019. The threats to officials and Investigating Agencies have been openly given in the video/audio messages placed on social media as relied in evidence led on record;
- (iv) The evidence led on record on behalf of the Union of India proves that subversive activities of SFJ are undermining the democratic fabric of the country by challenging the sovereignty and integrity of India. SFJ has employed numerous tactics to advance its agenda which includes organization of rallies, conducting social media campaigns and lobbying with international bodies to support cession of Punjab from India and forming an independent State of Khalistan. Apparently, the gullible youth are being used for activities such as hoisting of Khalistani flags on schools, buildings and offices of Government of India and of State Governments including offices of District Collector, Sub-Divisional Magistrate, etc. The campaign for 'Khalistan-2020' and 'voter bano' for Referendum along with slogans on signboards, walls and government offices has been proved on record. The removing of clips of railway tracks, burning of the Indian flag and scribbling "Khalistan Zindabad" slogans clearly reflect the anti-national activities of SFJ;
- (v) The authenticity, veracity and relevance of the material, which is in the nature of FIRs registered against the members and office bearers of the proscribed organization on account of indulging in secessionist activities, has been duly proved on oath by the concerned witnesses examined on behalf of Union of India. Despite ample opportunity granted to the association, neither any evidence has been led on behalf of the association to controvert the evidence on record in any manner, nor the same has been disproved;
- (vi) From the contents of the audio and video messages circulated by Gurpatwant Singh Pannun on social media and other platforms, there does not remain any iota of doubt that SFJ does not believe in the sovereignty and territorial integrity of India. Insofar as the call of SFJ for "Khalistan

Referendum” is concerned, the same is nothing but a movement for claiming right of self determination assailing the very foundation of unity and integrity of India. The term “*referendum*” is nothing but a subterfuge to plebiscite and claim for ‘right of self determination’ which in turn is nothing but a device or a mechanism to undermine and impugn the territorial integrity of India and to encourage secession of part of the territory of India;

(vii) The diatribe against the security forces and vitriolic attack against the security forces as revealed in evidence, by itself, is intended by SFJ to cause “disaffection against India”. In this regard, it may be noticed that definition of “unlawful activity”, in Section 2(o) of the UA(P)A specifically includes any action which causes or is intended to cause disaffection against India;

(viii) Also, the videos circulated by Gurpatwant Singh Pannun on social media as proved on record by the witnesses corroborate that SFJ through its protagonist Gurpatwant Singh Pannun has directly impugned the sovereignty and territorial unity of India and seeks to instill feelings of discontent/disaffection towards India. The speeches of Gurpatwant Singh Pannun also show that he vociferously advocates and endorses the creation of an independent state of Khalistan and its secession from the Union of India. Through the speeches as placed on Social media Gurpatwant Singh Pannun has also made an attempt to incite/instigate/provoke youth and groups to take unlawful activities towards this object. The same leads to an unequivocal inference that SFJ has been indulging into ‘unlawful activities’. Further, vitriolic speeches made by Gurpatwant Singh Pannun glorifying militants such as Bhinderwalan & Nijjar, making calls to assassinate Constitutional functionaries of the country, calling for a referendum which is nothing but a plebiscite, taken jointly or individually, also constitute “*sufficient cause*” for confirming the decision of the Union of India to extend the declaration of SFJ as unlawful association for a further period of five years.

(ix) Though in some of the FIRs, Untrace Reports have been filed by the Investigating Agencies and the accused could not be arrested but they manifest that SFJ clandestinely perpetrated the agenda of the secessionism. The unlawful activities in respect of painting graffiti and hoisting Khalistani flags and banners in the secret of darkness, have been claimed to be done at behest of SFJ through its chief protagonist Gurpatwant Singh Pannun in the videos circulated on Social media and other platforms. The offences committed in the said FIRs also reflect radicalization of youth and inciting feelings of disaffection in the hearts of particular community towards India.

129. The witnesses have unambiguously stated that SFJ through Gurpatwant Singh Pannun along with other members of the association have been:-

(a) involved in anti-national and subversive activities in Punjab and elsewhere, intended to disrupt the sovereignty and territorial integrity of India;

- (b) are in close touch with the militant outfits and activists, and is supporting violent form of extremism and militancy in Punjab and elsewhere to sever the territory of State of Punjab from Union of India so as to carve out a sovereign State of Khalistan;
- (c) SFJ is encouraging and aiding the activities for secession of a part of the Indian territory from the Union of India and supporting separatist groups fighting for this purpose in India and elsewhere by indulging in activities and articulations intended to disrupt the sovereignty and territorial integrity of India.

130. The ingredients of statutory definition of ‘unlawful association’ stands squarely satisfied if the above objectives of Sikhs for Justice (SFJ) in the light of evidence led on record are juxtaposed against the statutory definition of the “unlawful association” provided under Section 2(p) of UA(P)A. Section 2(p) includes any association which (i) has for its object any “unlawful activity” or which encourages or aids person to undertake “unlawful activity”, or of which the members undertake such activities. Furthermore, Unlawful activity, as statutorily defined under Section 2(o) refers to any action: (i) which is intended, or supports any claim, to bring about, on any ground whatsoever, the cession of a part of the territory of India or the secession of a part of the territory of India from the Union, or which incites any individual or group of individuals to bring about such cession or secession; (ii) which disclaims, questions, disrupts or is intended to disrupt the sovereignty and territorial integrity of India; or (iii) which causes or is intended to cause disaffection against India.

131. The evidence led on record musters the test of “sufficient cause” and proves that the version of Central Government as detailed in the Reference Note, has a greater probability of depicting true and correct nature of secessionist activities in which SFJ is involved, threatening the unity, integrity and sovereignty of India. The evidence of the witnesses examined on behalf of the Union of India cogently proves secessionist and other unlawful activities indulged by SFJ and its chief protagonist Gurpatwant Singh Pannun for purpose of creation of separate independent State of Khalistan and thereby threatening the peace, unity, territorial integrity and sovereignty of India.

XII. CONCLUSION

132. The evidence on record along with the material relied upon by the Union of India prove that unlawful activities have been undertaken by the Sikhs for Justice (SFJ) intending the cession or secession of the part of the territory of India, by propagating to create an independent State of Khalistan. The unlawful and disruptive activities on the face of record threaten the peace, unity, sovereignty and territorial integrity of India. The association is supporting violent form of extremism in Punjab and there can be no space for an association which openly advocates secessionism and undermines the sovereignty and territorial integrity of

India. In view of above, there is strong foundation for declaring Sikhs for Justice (SFJ) to be an ‘unlawful association’ under sub-section (1) of Section 3 of UA(P)A.

133. This Tribunal having followed the procedure laid down in the Unlawful Activities (Prevention) Act, 1967 along with Rules framed there under and having independently evaluated the evidence on record, is of the firm opinion that Sikhs for Justice (SFJ) through its chief protagonist Gurpatwant Singh Pannun has indulged in acts of secession, which directly impinge upon the territorial integrity of India.

Considering the evidence and material on record, there is sufficient cause and ample justification for confirming the declaration of notification No.S.O.2660(E) dated 08th July, 2024.

134. For the reasons recorded above, this Tribunal confirms the extension of declaration of Sikhs for Justice (SFJ) as an “Unlawful Association” by the Central Government for a further period of five years from 10th day of July, 2024 *vide* Notification No. S.O.2660(E) dated 08th July, 2024. Reference is accordingly answered in the affirmative.

135. I also place on record appreciation for invaluable assistance rendered by Mr. Jitendra Pratap Singh, learned Registrar to the Tribunal and Mr. S. D. Sanjay, learned Additional Solicitor General of India (ASG) along with Mr. Rajat Nair, Advocate and other associate counsels, namely, Mr. Sabarish Subramanian, Mr. Jay Prakash Singh, Ms. Nikita Sethi, Mr. Shubham Mishra, Mr. Khushal Kolwar and Mr. Dhruv Pande, Advocates for the Union of India. The dedication and commitment of the staff deputed with the Tribunal is also appreciated.

**JUSTICE ANOOP KUMAR MENDIRATTA,
Unlawful Activities (Prevention) Tribunal**

January 03, 2025

[F.No.17014/27/2024 – IS.VII]

ANIL SUBRAMANIAM, Jt.Secy.