

**IN THE HON'BLE COURT OF III ADDL. SESSIONS JUDGE -CUM-
SPECIAL JUDGE FOR SPE & ACB CASES, VIJAYAWADA,**

ANDHRA PRADESH.

REMAND REPORT

In

Gr.No.29/2021 U/S. 120(B),166, 167, 418, 420, 465, 468, 471, 409 (201), 109,
r/w 34 & 37 IPC and Section 12, 13(2) r/w 13(1) (c) and (d) of Prevention of
Corruption Act, 1988 of CID PS, AP, Mangalagiri.

Between:

State, CID, represented by its Dy.Suptd.of Police,
Economic Offences Wing-II, Crime Investigation Department,
Andhra Pradesh, Mangalagiri.

...Complainant

And

Sri Nara Chandrababu Naidu, age-73 yrs
S/o N.Kharjura Naidu,
former Chief Minister of Andhra Pradesh,
MLA, Kuppam Assembly Constituency,
Chittoor District. Door No.3-781/1,
Karakatta Road, Undavalli village,
Tadepalli Mandal, Guntur District

... Accused A.37

MAY IT PLEASE YOUR HONOUR,

I. Brief facts of the case: Though the Accused is arrayed in this report as A-37, he is the chief architect and conspirator of the offence.

1. This is a case of

(i) . "Criminal Conspiracy with a common object and intent for Criminal Breach of Trust and Dishonest and or Fraudulent Misappropriation or otherwise conversion for own use, disposal of the property entrusted or under control as a public servant or allows any other person, in violation of the direction of law, so to do by Public Servant or merchant.

(ii) disobeying law with an intent to cause injury and Framing an incorrect document by Public Servants,

(iii). Cheating with knowledge that wrongful loss may ensue to person whose interest, the offender is bound to protect,

(iv) Forgery, Forgery for the purpose of Cheating,

(v). Using a forged document as a genuine one,

(vi). Causing disappearance of evidence of offence or giving false information to screen the evidence,

(vii). Abetment,

(viii). Abusing position as a public servant for obtaining for oneself or for any other person any valuable thing or pecuniary advantage with common intention and co-operation, thereby causing misappropriation and wrongful pecuniary loss to the Govt Exchequer

that occurred prior to 09.12.2021 at the office of the Andhra Pradesh State Skill Development Corporation, Tadepalli, Guntur District **and at various other Government offices and places.**

B. It was reported on 09.12.2021 at 12 noon, wherein the then officials of APSSDC (Ghanta Subbarao, Dr. K. Lakshmi Narayana, Nimmagadda Venkata Krishna Prasad, and others) Dishonestly and Fraudulently, while holding office as a Public Servant, by abusing their official position, by corrupt and illegal means entered into an agreement which was drafted deliberately, and with criminal conspiracy, contrary to the terms and references of GO.Ms.No.4, Dt.30.06.2015, in connivance with the then MD, Soumyadri Shekar Bose @ Suman Bose of Siemens Industry Software (India) Pvt Ltd., New Delhi, and Vikas Vinayak Khanvelkar, MD of DesignTech, Pune, with an intention to misappropriate and to convert to personal pecuniary benefit of the accused, the funds of the APSSDC which were entrusted to them (worth

rupees around Rs.279 Crores out of Rs.371 Crores), given towards the 10% share of the State Govt. for the Siemens Project. Further, having conspired, they diverted APSSDC funds to a tune of Rs.279 Crores to various associated shell companies, viz. PVSP IT Skills/Skillar Enterprises Pvt Ltd., Allied Computers International (Asia) Ltd., M/s Patrik Info Services Pvt. Ltd., M/s IT Smith Solutions Pvt. Ltd., M/s Inweb Services Pvt. Ltd., M/s. Knowledge Podium, M/s. TalentEdge and others, by raising fake/bogus invoices without executing any work or providing competent services stipulated in the agreement. The shell companies further routed the money through other associated entities and thereby, committed misappropriation of an amount of Rs 279 Crores and caused huge wrongful pecuniary loss to the Govt. Exchequer and corresponding huge pecuniary gain to themselves and others by committing the offences of Criminal Misconduct, Criminal Breach of Trust, Forgery, Forgery for the purpose of Cheating, Using forged document as genuine, Cheating with the knowledge that their acts would cause wrongful loss to the public funds, whose interest the accused were bound to protect.

C. (i) the genesis of the crime is that the accused in the case projected to the Government of Andhra Pradesh as if the Technology Partners [M/s Siemens Industry Software (India) Private Limited (SISW) & M/s DesignTech System Private Limited (DesignTech)] would support a Skill Development Programme in the State of Andhra Pradesh.

(ii) That the project would involve setting up of 6 centres of Excellence and 36 Technical Skill Development Institutions.

(iii) That the estimated cost of the project would be Rs. 3281 Crores (approximately) of which, the technology partners would meet 90% of the cost of the project as Grant-in-kind and that the State Government had to invest only towards 10% of the cost of the project.

(iv) Government orders (GO.Ms.No.4 of SDEI Dept. dtd.30.06.2015) were issued to the effect stating about the objectives, cost estimate and the 90% and 10%

splitting of cost between the Technology Partners and the Government of A.P., respectively.

(v) However, after the issue of the Government orders, a Tripartite Agreement was prepared in such a manner that, in contravention of the letter and spirit of the above said proposals and Government orders, it was mentioned in clause 6(d) of the said agreement, that the Government of Andhra Pradesh would release Rs.371 Crores as a grant for M/s Siemens Industry Software (India) Private Limited (SISW) and M/s DesignTech System Private Limited (DesignTech) to setup the Skill Development Institutions. Conspicuously, the sequence of events envisaged in GO Ms. No. 4 dt. 30.6.2015 warranting the investments from the technology partners is given a complete go-bye. A project which was conceived to be primarily funded to the extent of 90% by Siemens and Designtech, was illegally converted into a government funded project, vide the tripartite agreement. Contrary to the terms and spirit of the said G.O., and the explicit terms of the limited permission granted under the said G.O., the accused conspired for entering into the agreement with a conspiracy to convert the same to their personal pecuniary benefit.

(vi) The release of the entire amount of Rs.371 Crores was done into the account of DesignTech in an urgent manner even before the Skill development institutions were set-up or the valuation of the work was done.

(vii) Subsequent to the receipt of the Rs.371 Crores, with the connivance of the officials of the Government of Andhra Pradesh and APSSDC, officials of M/s SISW and M/s Design Tech siphoned off a major portion of the amount without actually providing the commensurate goods and services.

(viii) Investigation done by the Directorate General of GST Intelligence (DGGI), Pune in 2017-2018 and The Income Tax Department, Pune unit, Maharashtra in 2018 have already established that an amount to the tune of at least "Rs.241 Crores" was misappropriated out of the "Rs.371 Crores" fund

given by the Government of A.P., This was done through utilization of fake invoices provided by affiliated shell companies, which were utilized to carry out a layered transmission of money, without actually providing any hardware, software, courseware, other goods/services, etc., money was drawn out of the bank accounts and passed on through Hawala Transactions.

(ix) A project envisaged to be 90% funded by the Technology partners was converted into a **work order of Rs.371 Crores given on nomination basis** by the accused, in violation of the General Financial rules, Central Vigilance Commission guidelines, etc., and by using a fraudulent modus operandi of generating fake invoices of shell companies with no actual business operations, to siphon off the money. The Government of Andhra Pradesh sustained a huge wrongful loss and the officials in the government and of the Technology partners had huge wrongful gains.

(x) The progress in the investigation was periodically laid before this Hon'ble Court while producing the following accused were arrested: /

- 1 Sri Ghanta Subba Rao – A-1 (remand report dt.13.12.2021)
2. Sri Soumyadri Sekhar Bose A-6 (Remand report dt.10.12.2021)
3. Sri Vikas Vinayak Khanwelkar A-8 (Remand Report dt.10.12.2021)
4. Sri Mukul Chandra Agarwal A—10 (Remand Report dt.10.12.2021)
- 5.Sri Sirish Chandrakanth Sha (Remand Report dt.14.12.2021)
6. Sri Vipin Sharma (A-25) - (Remand Report dt.23.8.2021)
7. Smt Neelam Sharma (A-28) ((Remand Report dt.23.8.2022)

The above mentioned Remand reports and the orders issued in this regard by the Hon'ble court are enclosed herein.

The Hon'ble High Court of Andhra Pradesh also had made an in-depth perusal of the facts of the case during the hearing on

(1) CrI RC no.203 of 2023 of Honble High Court of AP (on the matter of remand refusal orders of GVS Bhaskar) issued orders date 16.3.2023

*Sole reliance on this order is incorrect
as the second remand was rejected
and not challenged. Even GVS Bhaskar
has not challenged.*

2. CrI. P no. 3013 of 2023 (on the matter of anticipatory bail plea of GVS Bhaskar) and issued orders date.31.7.2023.

The above-said orders of the Hon'ble High Court of Andhra Pradesh are also enclosed herein.

D. Forensic Audit report: Forensic audit was also conducted by the APSSDC over the said Siemens-APSSDC project and it was found that around Rs.241 Crores was misappropriated by causing wrongful loss to the Government of AP through bogus invoices by the Technology partners, along with others. *Unphysical verification of subject / as part of forensic report itself*

E. Registration of the FIR:

(i) Based on the instructions vide Memo in C.No.143741/Skill/2021, dt.11.07.2021 of the Principal Secretary, Govt. of A.P. of Skill Development & Training (Skills) Department (SDT), the written complaint report dt.07.09.2021 was submitted by Sri. K. Ajay Reddy, Chairman, APSSDC. After submission of a Preliminary Enquiry report and after getting permission from the Addl.DG, CID, AP a case in Cr.No.29/2021, U/S 166, 167, 418, 420, 465, 468, 471, 409, 201, 109, r/w 120(B) IPC and Section. 13(2) r/w 13(1)(c) & (d) of Prevention of Corruption Act, 1988 of Crime Investigation Department, Economic Offence Wing, AP was registered on 09.12.2021 at 12:00 hrs against

A1 - Mr. Ghanta Subba Rao, the then Special Secretary to Govt., Skill Development, Entrepreneurship & Innovation Department, and the then Ex-Officio Secretary to Hon'ble Chief Minister, Govt. of A.P., and MD & CEO of APSSDC,

A2. - Dr.K. Lakshminarayana, the then Director of APPSSDC,

A3. - Mr. NVK Krishna Prasad, OSD/Spl officer to the then Secretary SDE&I Department,

A4. - Design Tech Systems Pvt Ltd, Pune,

A5. - Skillar Enterprises India Pvt. Ltd (formerly known as PVSP IT Skills Projects Pvt. Ltd. M/s Allied Computers International (Asia) Ltd., Mumbai

(ACI), A6. - Mr. Soumyadri Shekhar Bose @ Suman Bose, the then Managing Director, SIEMENS Industry Software (India) Pvt.Ltd.,

A7. - Mr. Pratap Kumar Kar, Chief Financial Officer, APSSDC,

A8. - Mr. Vikas Vinayak Khanvelkar, Chairman & MD of DesignTech Systems Limited, Pune and on 18 others i.e., Directors of shell companies, Govt officials and other persons (total 26 accused persons) for causing wrongful gain to accused persons, to their shell companies and to other persons and also for causing corresponding wrongful loss of at least Rs.241 Crores to the Govt., Exchequer. The original FIR, Preliminary Enquiry Report along with enclosure were submitted to the Hon'ble Jurisdictional Court and investigated into by Sri. M.Dhanunjayudu, DSP, EOW-2, CID, Andhra Pradesh. [wst named in FIR]

(ii) During the course of the investigation, 141 witnesses were examined so far and their statements were recorded. Hard and soft copies of the material evidence were collected. On verification of the documents and examining the witnesses, investigation disclosed that the accused Nara Chandrababu Naidu orchestrated the deep-rooted conspiracy by playing a key role at various stages, in collusion with the other accused, with a preconceived plan aimed at siphoning off of the funds released from the public exchequer towards the project. His (A-37) name was added to the list of the accused vide memo dated.8.9.2023 submitted to this Hon'ble ACB Court. (it appears that it has been added after arrest)

(iii) It is also necessary to submit that on the basis of the present FIR and the investigation, the Enforcement Directorate initiated proceedings under the PMLA, 2002 under ECIR No.HYZO/3/2022, dt. 4.3.2023 and the investigation by the Enforcement Directorate are ongoing. The said investigation is into the aspects of money laundering which is clearly writ large on the facts of the case, emanating from the crime proceeds involved in the instant crime. The Enforcement Directorate has caused arrest of 1) Soumyadri Shekhar Bose alias Suman Bose, Ex-MD of M/s Siemens Industry Software India Pvt Ltd, 2) Vikas Vinayak Khanvelkar (MD, M/s Designtech Systems Pvt Ltd), 3) Mukul

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has been

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Chandra Agrawal, Ex-Financial advisor, and authorized signatory of M/s Skillar Ent India Pvt Ltd and 4) Suresh Goyal, CA in a money laundering case for diversion and misutilization of funds of APSSDC and others. The ED has provisionally attached properties amounting to Rs.31.20 Crore belonging to M/s Designtech Systems Pvt Ltd (DTSPL) in the money laundering case for diversion and misutilization of funds. The ED also filed the prosecution complaint against the above 4 arrested accused. (released m b n i d / 12.05.2023)

G. Synopsis of the specific role played by Sri.Nara Chandrababu Naidu (A-37):

A detailed report on the details of this investigation submitted to the Joint Director, Enforcement Directorate, Hyderabad is enclosed herein as an Annexure.

The unfolding of the conspiracy, spearheaded by the then Chief Minister, Nara Chandrababu Naidu (A-37) happened in the following sequence:

- i. The vendors M/s Designtech and M/s SISW approached Nara Chandrababu Naidu through an intermediary, who was a TDP leader – Mr. Illendula Ramesh and submitted the proposal of setting up a Centres of Excellence for Skill Development. (all vague no reference to date or time / to who)
- ii. As a part of the conspiracy to misappropriate the money from the public exchequer, Sri.Nara Chandrababu Naidu orchestrated the incorporation of the A.P. State Skill Development Corporation (APSSDC), bypassing the Council of Ministers and appointed handpicked people, such as Sri. Ghanta Subba Rao and Dr. K. Lakshminarayana, Rtd.IAS as the MD& CEO and the Director of the APSSDC, respectively.
- iii. A new Department for Skill development, Entrepreneurship and Innovation was created as the controlling Department for APSSDC and placed before, Sri. K. Atchanaidu, the then Minister.
- iv. Merely based on the power point presentations given by the representatives of M/s Designtech and M/s SISW, Sri.N.Chandrababu

Naidu and Sri.K.Atchannaidu gave a concurrence to the project without making any market survey or following other cannons of financial propriety.

- v. Hiding the fact that no due diligence was carried out or no detailed project report was prepared, N.Chandrababu Naidu and Sri.K.AtchanNaidu gave a false projection before the Council of Ministers that, the estimated cost of the project would be Rs. 3281 Crores (approximately) of which, the technology partners would meet 90% of the cost of the project as Grant-in-kind and that the State Government had to invest only towards 10% of the cost of the project.
- vi. The same notefile with proposal for approval of the Draft of (GO.Ms.No.4 of SDEI Dept. dtd.30.06.2015) stating about the 90% and 10% splitting of cost between the Technology Partners and the Government of A.P., respectively and the draft of the **M.O.U / Tripartite Agreement which was in contravention of the letter and spirit of the GO.Ms.No.4**, mentioning only that the Government of Andhra Pradesh would release Rs.371 Crores as a grant for M/s Siemens Industry Software (India) Private Limited (SISW) and M/s DesignTech System Private Limited (DesignTech) to setup the Skill Development Institutions, **was approved by the Sri. N.Chandrababu Naidu and Sri. K.AtchanNaidu.**
- vii. After the M.O.U was signed, the entire amount of Rs 371 Crores were released in advance by the State Finance Department and the APSSDC to M/s Designtech, even before the sites were selected for setting up the Skill development Centres and without obtaining any performance guarantee or bank guarantee. Despite the objections taken by Smt K.Suneetha, Secretary of Finance Department, that it may not be appropriate to release the amount for various reasons pointed out, and

Project was
was verified
by GATD

further took objections for the release of the amount unless for the reasons and six conditions imposed by the complied. Though the view taken by PFS, amounts were released based on the order of Chief Secretary and CM. Through M/s DesignTech, an estimated amount of Rs 279 Crores were siphoned off as described above, through shell companies, fake invoices, layered transmission of money and hawala transactions of cash. (FIR is belated / generic to a GST investigation) - in earlier report this has not been made a goal / appears to be an attempt

- viii. This accused conspired with the Merchants, namely M/s. Design Tech and its Managing Director and the Managing Director of another Merchant, M/s SIEMENS, Pune. The said entities/persons being Merchants, in terms of the obligations imposed in GO Ms. No. 4 and also the tripartite agreement, were entrusted with the property being the monies of the State, of an amount of Rs. 371 crores with a clear cut direction in law, as contained in GO Ms. No.4, in any event as contained in the tripartite agreement, to perform the obligations of supplying the hardware and software as enumerated in annexure I and II of the agreement. On being entrusted with such monies, the Merchants committed criminal breach of trust, with the active conspiracy by this accused (Sri.N.Chandrababu Naidu), by not performing in accordance with G.O. Ms. No. 4 and the tripartite agreement, and by over ruling the objections raised by the concerned finance Department not to release the amount by indulging in acts of siphoning off the entrusted government monies. The accused herein, by being a conspirator therefore, is punishable under Section 409 of IPC, by reason of Section 120B (1)".

all documents in nature by words?

- ix. No monitoring committee as envisaged by a Government order was established to oversee the setting up of the Skill development Centres, owing to the connivance of N.Chandrababu Naidu and K.AtchanNaidu with the other accused.

no reference to legal aid / consent for Monitoring Committee.

- x. All checks and balances such as valuation of the project by a third party (Central Institute of Tool Design) and maintenance of an Asset register through a competent agency were compromised to hide the wrongdoings of the accused. *(Completion certificate has been handed over by all authorities)*
- xi. The **notefiles** pertaining to the project were **removed** from the Secretariat by the accused, soon after the Central tax agencies started unearthing this network of misappropriation of funds. *↓
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CID
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verified
the same*
- xii. The statements of the witnesses recorded and the note files pertaining to the relevant GOs disclosed that the accused A-37 acted being a Public servant during 2015-2019 and abusing his possession as Public servant, obtained pecuniary advantage to M/s DesignTech (A-4) which in turn money had been parked in the other shell companies such as PVSP/Skillar, ACI, Inweb and Patrick Info etc companies.

G (a). Note on overt acts of Sri N. Chandra Babu Naidu, the then CM of AP, along with the references of the concerned notefiles/documents:

- a. After approaching Sanjay Daga of M/s DesignTech company to Sri.N.Chandrababu Naidu on the Skill development project through Illendula Ramesh, who is a leader of TDP Party and close associate of Sri.N.Chandrababu Naidu, he (Sri.N.Chandrababu Naidu) informally gave commitment and forwarded a letter given by the Illendula Ramesh to Higher education department. After that, on the instructions of Sri.N.Chandrababu Naidu, the then secretary called G.Subbarao and introduced to Sanjay Daga of M/s DesignTech to deal with the M/s DesignTech company and to pursue the Siemens project. Later on 22.08.2014, Sanja Daga and his team along with Illendula Ramesh gave a presentation on the project to Sri.N.Chandrababu Naidu at the Secretariat, Govt of AP..
- b. APSSDC was formed by Sri.N.Chandrababu Naidu on 10.09.2014 without getting approval from the Cabinet, by appointing his henchmen Sri.G.Subbarao (A-1) and Dr.K. Lakshminarayana, IAS (Rtrd) (A-2) as a MD & CEO, Director for APSSDC respectively. Sri.N.Chandrababu Naidu himself approved the same by deviating the *on
accounting
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(Subin)*

remarks that "for formation of corporation cabinet approval is necessary as per Business rules of AP" and formed APSSDC by keeping under control of Higher education department with an intention to misappropriate the Govt. funds in the name of Skill Development project through Sri.AtchanNaidu, A-1, A-2 and in collusion of Siemens and DesignTech companies. On the instructions of Sri.N.Chandrababu Naidu, the board comprising A-1 and A-2 appointed J. Venkateswarlu, Chartered accountant who is a close associate, nearest relative of A-4 as an auditor to the APSSDC on 20.10.2014. Sri.N.Chandrababu Naidu approved MoA and AoA of APSSDC and issued GO.Ms.No.48 without following the due procedure through the coordination of A-1.

- c. Further, on 07.10.2014, Sri.N.Chandrababu Naidu appointed A-1 as a Ex-officio Secretary to Higher Education department, to execute the plan of Sri.N.Chandrababu Naidu and to play a key role in the execution of a plan of misappropriation of Govt funds in the Siemens project.
- d. On the instructions of Sri.N.Chandrababu Naidu, A-1 coordinated and colluded with A-2, A-6 to A-10 and got prepared the cost estimation of the Siemens Project through the Siemens team lead by A-6 without any base, supported bills, quotations, reasonable explanation of the cost, detailed project report etc. Same was submitted as a draft resolution of table item by A-1 one day before i.e. on 15.02.2015 to the cabinet meeting of AP held on 16.02.2014. Sri.N.Chandrababu Naidu and Sri.K.AtchanNaidu through the AP Cabinet headed by Sri.N.Chandrababu Naidu approved the Skill Development Project as a special item (Means in special conditions, at urgency) to establishment of 6 clusters in AP, each cluster cost of Rs.546.84 crores with 90% contribution of M/s DesignTech and M/s Siemens provides under Grant in Aid and 10% contribution by Govt for 2 years. In the interest of Sri.N.Chandrababu Naidu and Sri.K.AtchanNaidu, the said project was approved by the AP cabinet on the instructions of Sri.N.Chandrababu Naidu, without verifying the authenticity, basis for the cost estimation of the project, without getting 3rd party evaluation, without doing assessment and without following the tender process. → (ITD is 3 Party)
- e. On 30.01.2015, even though SDE&I department was not established, Sri.N.Chandrababu Naidu appointed A-1 as a Secretary to Department of Skill Development, Entrepreneurship and Innovation dept (SDE&I) and as a Ex-officio

secretary to Chief Minister, AP. As on 30.01.2015, A-3 was holding 4 prominent posts in AP Govt. After that on 25.02.2015, Sri.N.Chandrababu Naidu created a new department i.e. SDE&I (Skill Development Entrepreneurship and Innovation dept) to achieve the object of Skill development and to coordinate Skill development programs of various departments. After that, on 04.03.2015 on the representation of A-1, AP cabinet headed by Sri.N.Chandrababu Naidu was approved to sanction a budget of Rs.370.78 crores towards 10% contribution of Govt.

- f. Sri.N.Chandrababu Naidu with criminal intention, to create green channel, to avoid intervention, supervision of Principal secretary, Higher Edn dept on the Siemens project, the APSSDC was brought under SDE&I dept and got direct access of files movement of this project from A-3 to Sri.N.Chandrababu Naidu. This was done on 26.06.2015 i.e. 4 days prior to execution of agreement/MoU with Technology partners. A-1 was head for these two departments i.e. MD & CEO to APSSDC and Secretary to SDE&I department. Flow chart of the file movement furnished below.

APSSDC → SDE&I Department → Chief Minister of AP

- g. Sri.N.Chandrababu Naidu through the other accused Sri.AtchanNaidu, A-1, A-2, A6 to A-10 fraudulently, falsely projected the total project cost as Rs.3281 crores (excluding taxes) without any basis and assessment. On 30.06.2015, GO.Ms.No.4 was issued through SDE&I dept and clearly mentioned the contribution of the technology partners (90%) and the Govt (10%), to show the same to the public. Sri.N.Chandrababu Naidu abetted, allowed, cooperated and coordinated A-3 and got agreement executed with the technology partners by the APSSDC through A-1 by intentionally omitting the important aspects i.e. 90% contribution of the technology partners and Bank guarantee clauses in the MoU and done official favour to get wrongful gain to the technology partners, gave scope to them to avoid their 90% contribution and to cause wrongful loss to the Govt funds.
- h. Prior to 3 months before Smt Aparna.U, IAS (A-36) who is wife of GVS Bhaskar (A-35), Senior director of Siemens company appointment as a Dy.CEO, Sri.N.Chandrababu Naidu allowed her (A-36) to participate in the presentation on the project by the Siemens team to Sri.N.Chandrababu Naidu, Sri.K.AtchanNaidu and others at AP secretariat and shared information regarding the APSSDC project. After that,

Sri.N.Chandrababu Naidu appointed Smt. Aparna.U, IAS in a key post i.e. Dy.CEO to APSSDC on 17.07.2015 through A-1 to execute their plan.

- i. On 11.03.2015, Sri.N.Chandrababu Naidu ,himself declared in the AP legislative assembly that the technology partners i.e. M/s DesignTech and M/s Siemens came forward to invest 90% i.e. around Rs.2,500 crores to the project. But here, Sri.N.Chandrababu Naidu conducted a monitoring meeting on 04.11.2016 and also after, over the said project, Sri.N.Chandrababu Naidu intentionally did not insist on the 90% contribution of the technology partners and didn't ask/verify how much amount contributed/invested by the technology partners to do official favor to them.]

it is grant in aid - aid was technological in nature.

- j. On verification of the note files on release of Govt funds to the Siemens project and the statements of the then officers of finance department, Chief Secretary of AP, it is found that Sri.N.Chandrababu Naidu with criminal intention, collusion with A-1, A-6 to A-10 and to do favour for the technology partners and to gain himself, Sri.N.Chandrababu Naidu, without taking consideration of adverse remarks of the officials of finance department noted on the abrupt release of Govt funds, instructed officials of finance department through the then Chief Secretary of AP to release the APSSDC funds immediately without taking 90% contribution from technology partners as Grant-in-Aid. The important remarks of note files were furnished below. (all the points are without basis of verification of

1. In para number 35 of the note file of GO.Ms.No.47 regarding APSSDC formation, the Principal Finance Secretary clearly noted that "Creation of a new corporation requires cabinet approval". But Sri.N.Chandrababu Naidu floated rules and approved the note file for formation of APSSDC with noting that "issue immediately". insistence
had
done)
2. In para No.153 of the note file of GO.Rt.No.2452, regarding release of funds Rs.270 crores to Siemens project, the Principal Finance Secretary remarked that "the department is requested to work out protocol for operation of funds". On this the then CS of AP (Sri IYR Krishna Rao) instructed with note that "Para No.27 is agreed in a meeting conducted by CM. Finance may release BRO accordingly". At the note of the CM column it was mentioned that "ai" i.e. after issue. It means after issuing a Budget file may be put up to CM as already CM instructed CS to release funds. .
3. As per para No.160 in the note file of GO.Rt.No.2452, the Smt K.Suneetha, Secretary, Finance clearly remarked by verifying all aspects that "it may be advisable for the Govt

to reconsider releasing the total amount. May be a pilot project in one area as endorsed in para No.21 with 55 crores and asked for orders". On this Principal Finance Secretary instructed with note vide para No.161 & 162 that "The Chief secretary spoke to me (PFS) today requesting for immediate clearance of the file. Mr.G.Subbarao met me (CS) and requested for release of money as decided by the CM. Considering the decision of CS/CM, orders of CS at para 31 on page 46 be implemented. The Skill development department asked to furnish a copy of MoU for our record". After that the budget was released to Technology partners of the Siemens project as per the instructions of the A-37.

4. BROs for a total project amount of Rs.371 Cr was released in various installments to APSSDC in the year 2015. In para No.15 of page No.228 of note file regarding GO Rt.No.13, it is found that CS made his remarks that "issue is discussed in the meeting with CM. An Amount Rs.25 Crore BRO may be released and file put up after issue". After that, at the place of remarks of CM, a word "ai" i.e. after the issue of the said GO was mentioned.
5. In para No.31 of page No.67 of note file regarding GO Rt.No.12, it is found that the then Chief Secretary, AP put his remarks that "para No.27 is agreed (release of Rs.270 Crore) to in the meeting conducted by CM. Finance may release BRO (for Rs.270 Cr) accordingly". After that, at the place of remarks of CM, a word "ai" i.e. after the issue of said GO was mentioned.
6. Smt. K. Suneetha, IAS the then Secretary, Finance dept while circulating note file regarding sanction of Budget for Siemens project, she clearly mentioned that "Must ascertain whether the machines provided are outdated or contemporary". Without complying with her instructions, the budget was released as per the instructions of Sri.N.Chandrababu Naidu.
- k. Sri.N.Chandrababu Naidu in collusion with A-1 and A-2 along with the other accused of Siemens and M/s DesignTech Companies approved the budget of Rs.371 Crore even though adverse remarks/comments noted by the officials of Govt. in the note files, through A-3 gave administrative sanction GOs to release funds in Sep, 2015 and Sri.N.Chandrababu Naidu got released the budget of Rs.371 Crore from 05.12.2015 to 31.03.2016, prior to 3rd party evaluation and without receiving 90% contribution in the total project as Grant-in-Aid from the said 2 companies.

- i. On 14.05.2018, a complaint from the DGGSTI office, Pune was sent to ACB and disclosed all the details of routing of APSSDC funds to shell companies through the fake invoices without providing services to APSSDC by the M/s DesignTech and others. On this, regular enquiry was ordered by ACB, but not done anything during the Govt of Sri.N.Chandrababu Naidu. Even after knowing about this by Sri.N.Chandrababu Naidu to A-1 and they did not take any criminal action, preventive steps to stop misappropriation of APSSDC funds in the Siemens project.
- m. Sri.N.Chandrababu Naidu ,through his henchman A-1 i.e MD&CEO of APSSDC and Secretary, SDE&I dept.,, caused to the disappearance of the evidence i.e. original note file relating to the GO.Ms.No.4, dt.30.06.2016 through the A-3 (OSD to A-1) who had in possession of said note files. This act was done to escape from the liability of the commission of the offence and to destroy the crucial evidence connected to this case.
- n. Sri.N.Chandrababu Naidu, with criminal intention, appointed his henchman i.e. A1, A2 and auditor J.Venkateswar Rao and strategically placed them in important posts in the APSSDC, executed his plan and misappropriated around Rs.145,37,32,468 of Govt. funds. He allowed his henchman (A-1), (A-2) etc to continue in the same post giving them an opportunity to destroy the records i.e note files. The above misappropriation figures indicate the magnitude of the offence of misappropriation in the Government.
- o. As per the material of evidence, it is clearly established that Sri.N.Chandrababu Naidu committed the offence through a prior conspiracy led by him with Sri.K.AtchanNaidu, A-1, A-2 and others. Sri.N.Chandrababu Naidu, with criminal intention, led the AP cabinet, approved the cost estimation of Siemens project received through A-1, without any assessment, verification, proper DPR and evaluation. The said cost estimation was received by A-1 from A-6 prepared by A-6 and his team, others. In March 2015, Sri.N.Chandrababu Naidu also approved the release of Govt contribution of Rs.370 Crores to M/s DesignTech through his cabinet and allotted the Siemens project on nomination basis and without any tender process. The accused, Sri.N.Chandrababu Naidu, while holding office as public servant, conspired, colluded with Sri.K.AtchanNaidu and others and with criminal intention, released the Govt funds through the accused without verifying the contribution of Technology partners, allowed other accused to do fraudulent and illegal acts, committed misappropriation of Government funds to the tune of around Rs.279 Crores which were entrusted to them

or under their control by corrupt and illegal methods. Sri.N.Chandrababu Naidu by abusing his official position, fraudulently committed criminal breach of trust with a common intention, caused wrongful loss to the Government exchequer. Sri.N.Chandrababu Naidu ,through A-1, allowed other accused and others to divert APSSDC funds by using fake invoices as genuine one for purpose of cheating through the shell, defunct companies without providing materials/services to the APSSDC-Siemens project by the M/s DesignTech, by conspiring, colluding and intentionally co-operating in the commission offence with several acts of by the concerned Directors of companies and private persons. Sri.N.Chandrababu Naidu reviewed the Siemens project, but he intentionally did not verify about 90% contribution by the Technology partners to do favour to the accused.

H. Reason for the arrest and requirement of custodial interrogation:

For an expenditure of about Rs. 550 Crores per cluster (Rs 3300 crores estimated value, overall), 10% of the cost had to be contributed by the Government of Andhra Pradesh / APSSDC. From the narration of the G.O.Ms.No.4, the release of monies proportionately ought to coincide with the timeline of the establishment of the clusters. However, the following is the basis for conferring undue unlawful gain to the private industry, more particularly, M/s Designtech, as under:

- i) Even before a rupee was spent by M/s SISW and M/s Designtech towards the establishment of the 6 clusters, the hundred percent liability undertaken by the GoAP/APSSDC amounting to Rs.371 crores, which would be the overall 10% of the project value committed to by the government, during or after establishment of the 6 clusters of CoEs was given as an advance.
- ii) By reason of this windfall, contrary to the spirit and letter of the G.O.Ms.No.4, with recourse to the M.O.U., the wrongful loss to the public exchequer and the wrongful gain to the private individual occurred as under:

- a. It is only with the government funds, that the private firms had chosen to develop the 6 clusters of CoEs at 6 places.
- b. Investigation so far revealed that the total money expended by the private entities towards these 6 clusters is only out of the monies advanced by the GoAP/APSSDC as above, totalling to Rs.371 crores.
- iii) Investigation further revealed that a large part of the money so spent was diverted to shell companies based on fake invoices, without the actual delivery or sale of the purported items transacted under the invoices.
- iv) While a part of the Rs. 371 crores was spent for the creation of the 6 CoE clusters, which itself is a departure from G.O.M.S.No.4, the rest of the monies were routed and rerouted through shell companies. Investigation revealed that **Sri.N.Chandrababu Naidu and the Telugu Desam Party were the end beneficiaries of the misappropriated money.**
- v) "Sri.N.Chandrababu Naidu (A-37) being the Principal conspirator" for the creation of a step-down entity and being the "only and unilateral decision maker", in respect of all the transactions concerning the further transfer of money, he is the "principal architect" of the entire scheme, the intent as it transpires now was to transfer the public monies to the credit of a private entity disproportionately and without reference to the G.O.M.S.No.4 issued and allowing the money to be defrayed through shell companies, for private gains of individuals which have now being spoken to (Allied Computers International Ltd, Knowledge Podium, etc.) The departure in the administrative decision-making process was oriented specifically to achieve this objective where the monies routed through shell companies went in to the pockets of Mr. Vikas Khanvilkar, etc and the monies actually spent were not by Siemens or Designtech, but the government monies spent, therefor. So, there is a loss of money to the public exchequer and there is a conferral of gains to private entities.

vi) The notefiles regarding the subject matter, clearly indicate that in spite of the objects to the release of the funds as contemplated under the tripartite agreement, by the relevant government officials, the funds were released as per the instructions of Sri.N.Chandrababu Naidu. The said note files are borne out by the affirming statements of the witnesses including under Section 164 Cr. P.C.

vii) Personal and exclusive knowledge of all the preparatory transactions leading to the issuance of the G.O, and the M.O.U., to the exclusion of any other Govt., functionary makes "N.Chandrababu Naidu the principal possessor of information" relating to the subject matter, leading to these modus - operandi.

viii) During the course of investigation, from credible sources, copy of a Notice was obtained -with DIN and Notice number: ITBA/AST/F/153C(SCN)/2023-24/1054891034(1), dated 04/08/2023 issued and digitally signed by Sri Dondapati Venkata Harish, IRS of the Central Circle-2(4) Hyderabad of the Income Tax Department to Nara Chandrababu Naidu.

It revealed that a system existed for generating bribes for Sri. Nara Chandrababu Naidu, from the various work contracts issued by the Government of Andhra Pradesh in the period 2017-2019. There was a modus operandi of generation of cash through bogus invoices for procurement of works, goods and services by the subcontractors of the main contractors executing the work. The cash was handed over to the persons and at the places as directed by the Sri. Nara Chandrababu Naidu, by the representatives of the companies executing the works.

As per the investigation carried out by the Income Tax Department, one of the main persons involved in this modus operandi is, Sri. Yogesh Gupta (A-22 involved herein). He, along with one Sri Manoj Vasudev Paradasany, representing M/ s Shapoorji Pallonji Ltd, M/s L&T Ltd, etc was involved in

generating cash from the funds drawn from the public exchequer, through fake invoices, as was done in the instant case also.

The cash was handed over to

1. Sri. Pendyala Srinivas, an employee of the Government of Andhra Pradesh, who was working as the Personal Secretary to Sri. N. Chandra Babu Naidu, the then Chief Minister.

2. Sri. Kilaru Rajesh, who is a close associate of the Sri.N.Chandrababu Naidu and Nara Lokesh, who is the son of Sri.N.Chandrababu Naidu, the then MLC and a Minister in the Government of Andhra Pradesh, during the above said period.

For getting the certified copies of the evidences from the Income Tax Department, a letter was addressed to the Chairman, Central Board of Direct Taxes, New Delhi and the obtaining the material is pending.

ix) In the meantime, notices under section 160 CrPC, dated 5th September, 2023, were sent to

1. Sri. Manoj Vasudev Paradasany,
2. Sri. Pendyala Srinivas, requesting them to join the investigation.

However, without acknowledging the receipt of the above said notices, Sri Manoj Vasudev Paradasany left for UAE from Mumbai, by a flight at 19:10 hrs on 5th September, 2023 and Sri Pendyala Srinivas left for USA on 6th September, 2023 without the prior permission of the Government of Andhra Pradesh, as mandated by the service rules for a serving civil servant.

This indicates that both of them absconded to avoid being questioned by the Investigation Officer and more particularly to shield the illegal activities of the Sri.N.Chandrababu Naidu and his family members. It is learnt from credible sources that Sri.N.Chandrababu Naidu facilitated the absconding of

the above two named individuals in order to frustrate the further course of investigation into the subject matter.

x) The end use of the monies which were apparently being drawn out as cash and parked with Vikas Khanvilkar, etc. are required to be ascertained as it is now revealed that the principal architect of all these activities (Sri.N.Chandrababu Naidu) was doing all this to secure the funnelling of the funds back through the shell companies to himself. He has to be confronted with Mr.Suman Bose, Mr.Vikas Khanvilkar, the Directors of the shell companies and other principal co- conspirators such as Sri. Sanjay Daga, Sri. Ghanta Subba Rao, Dr. K. Lakshminarayana, etc for eliciting further details about the modus operandi. Investigation revealed that Nara Chandrababu Naidu his family members and the Telugu Desam party were the end beneficiaries for the money thus misappropriated.

xi) Disappearance of the key note files and the principal beneficiary of the same, are the Sri.N.Chandrababu Naidu and Sri.K.AtchanNaidu, Sri.Ghanta Subba Rao and Dr.K.Lakshminarayana. The disappearance of evidence and the disappearance of the key persons believed to be connected with the crime, clearly evidences the role of Sri.N.Chandrababu Naidu in prevailing upon the concerned from disclosing facts relevant to investigation.

Xii) The reason for the present proceedings is the compilation of all the statements which have been made including the recently recorded statement under section 164 CrPC of Sri Sirish Shah(accused) in relation to the journey of funds, it became necessary that Sri.N.Chandrababu Naidu being out any further, hampers the disclosure of information during the investigation.

xiii) The offences are punishable for more than 10 years of imprisonment. The nature of offence being a financial misdemeanour by public officials with a deep-rooted conspiracy lying behind, it is necessary for the investigation agency to interrogate the accused (Sri.N.Chandrababu Naidu) to unravel all the elements of the deep-rooted conspiracy which has been hatched to secure

the Private gain to the named individuals therein, as also the departure from the official business. Such a financial fraud can be unearthed only after the investigation agency secures the information which it seeks to, in getting all the witnesses to confront against this particular accused (Sri.N.Chandrababu Naidu). The conclusion of investigation is not possible unless Sri.N.Chandrababu Naidu is arrested.

xiv). Sri.N.Chandrababu Naidu was arrested in due compliance with the procedure prescribed under Cr.P.C. The I.O applied his mind and was bonafide satisfied, that the arrest of the accused is necessary in the light of the above circumstances, to complete the investigation, and to ensure that the accused does not further cause disappearance of the evidence or prevail upon other persons connected with the case, to dissuade from participating in the investigation.

xv. It is also necessary to state that the accused herein is accused No. 1 in Cr. No. 16/22 dt. 9.5.2022 registered by the CID, A.P. The subject matter of investigation is a similar modus operandi adopted by the accused while performing duties as a public servant as the Chief Minister of the State at the relevant point in time. Investigation in the said case disclosed that the accused with another Minister in the government in collusion with other public servants and private persons was involved in the process of finalisation of designs of IRR and Zonal Development Plans to show undue favour in order to cause wrongful gains to certain private individuals, such as Sri Lingamaneni Ramesh, Heritage Foods Limited, being a company managed by the family members of the accused, etc. It is disclosed during the course of investigation that the Inner Ring road alignment of the capital city was designed in a systematic manner, starting with the award of work of designing the draft perspective plan and Master Plan of the capital city to Surbana Consultants International Private Limited on nomination basis. The designs of the Master Plans were closely guided by the Sri. N.Chandrababu Naidu along with another Minister Sri Narayana for MAUD. The alignment of IRR underwent

much iteration to protect the land owned by various accused in the case, including M/s. heritage Foods Private Limited, Mr. Lingamaneni Ramesh, and various other beneficiaries who are closely linked to Mr. N. Chandrababu Naidu. Each of these decisions was organised to cause direct benefit to the said private entities while Mr. Naidu, in a quid pro arrangement with such entities, secured benefits, including the house given free of cost to him by Mr. Lingamaneni Ramesh. The accused during the relevant point in time, actuated by the design to cause personal gain to private entities by virtue of the official decisions, is habituated to cause loss to the State by organising taking decisions in Government accordingly.

xvi) Nara Chandra Babu Naidu was Member of Legislative Assembly for Kuppam Assembly Consequence for the period 2014 to 2019 and he was Chief Minister of Andhra Pradesh during the said period. Hence he was a Public Servant as per section 2 of Prevention of Corruption Act, 1988 for the said period.

J. Investigation reveals that, a prima-facie case was established for the offences U/s 120(B), 418, 420, 465, 468, 471, 409, 201, 109 r/w 34 & 37 IPC & Section 12, 13(2) r/w 13(1) (c) and (d) of Prevention of Corruption Act, 1988 against Sri Nara Chandra Babu Naidu (A-37). In this regard accused adding memo was filed before the Hon'ble Court for taking further action in the matter.

K. Arrest of the accused:

The offences are punishable for more than 10 years of imprisonment. Though the A-37 is not a flight risk, the nature of offence being a financial misdemeanor by public officials with a deep-rooted conspiracy lying behind, it is necessary for the investigation agency to interrogate the accused (A-37) to unravel all the elements of the deep-rooted conspiracy which has been hatched to secure the Private gain to the named individuals therein, as also the departure from the official business. Such a financial fraud can be unearthed only after the investigation agency secures the information which

it seeks to, in getting all the witnesses to confront against this particular accused (A-37).

On information receiving about the accused- A-37, DSP, EOW-II, CID, AP visited the staying place of the accused Sri Nara Chandra Babu Naidu and identified him as the accused (A-37) in this case confirmed his (A-37) identification.

The accused Sri N.Chandra Babu Naidu (A-37) got informed by the Dy.Suptd.of Police, CID, EOW-II, A.P. u/s 157 (1) Cr.P.C., as a prima facie case was made out against him and the evidence came to light and there are reasonable grounds that the accused-37 (Sri N.Chandra Babu Naidu) has committed the offence and involved in misappropriation of Rs.279 crores in the project by diverting to shell companies and there is necessity of further custodial interrogation. The offence committed by the A-37, attract the above said sections of different Acts of laws of ten years of imprisonment.

Hence, the accused **Sri N.Chandra babu Naidu (A-37) was arrested at 06:00 hrs on 09.09.2023 at RK function hall, Gnanapuram, H/s Moolasagaram, Nandyal town** after explaining the reasons of his arrest by contemplating the provisions of law. The arrest information was given to his associate Sri Kalava Sreenivasulu, Polit Bureau Member, TDP Party, Anantapur U/s 50(2) Cr.P.C. After attending all the legal formalities u/s 50(i), 50(ii) Cr.P.C., Sri Nara Chandrababu Naidu (A-37) was taken into custody. During arrest, the team of medical officers examined the accused at Arrest place. Later the accused was brought to the office of EOW-2, CID, AP, Tadepalli around 17.00 hrs on 9.9.2023 and kept under the surveillance of the escort officers. The arrest of the accused A-37 was intimated to the Honble Speaker of Legislative Assembly of Andhra Pradesh.

On 10.09.2023, the accused A-37 was sent to Medical examination and examined by the doctors of the GGH, Vijayawada and obtained medical certificate.

L. Behaviour subsequent to arrest:

Sri.N.Chandrababu Naidu was placed under arrest in Nandyal at 0600 hrs on 09/09/23 at RK function hall, Nandyal town of Nadyal district. He was informed that a helicopter was paid for and hired to transport him from the Kurnool airport to Gannavaram airport, owing to the security categorisation he had. However, he refused to utilise the services of helicopter and insisted upon travelling by road. Consequent to this, when Sri.N. Chandrababu Naidu was being transported from Nandyal to the CID office in Tadepalli, in Guntur Dt, in response to the calls for protests issued by the Telugu Desam Party, the convoy was obstructed by use of violent force by the supporters of Sri. N. Chandrababu Naidu. This is a clear indicator of the attitude of the accused in intimidating the Law enforcement authorities and witnesses by virtue of his position as the head of a political party, to scuttle the ongoing investigations.

M. Requirement of judicial custody:

Non-cooperation of the accused: After reaching the office of the CID (EOW-2), the accused was questioned about his role in the offences, in the presence of two mediators. He was given breaks as per his requests, to consult a legal counsel, to meet the members of his family, to have food and refreshments, etc. He was asked questions based on the note files which form part of the evidences in this case diary. But, to all the questions, he was non-cooperative and replied vaguely that he could not recollect the facts. In this regard mediator report was drafted in the presence of mediators duly attested by him.

In this case, the APSSDC funds diverted by DesignTech through PVSP (A-5) to various shell, inoperative, foreign companies (Singapore and London based), among these diversion to some companies was established, regarding some companies they are winded up, not tracing, not responding and investigation is under process.

As the investigation is under progress and there is need of custodial interrogation of the accused A-37 (N.Chandra Babu Naidu) is necessary and the following reasons are for arresting the accused-37.

- 1) Other official witnesses are to be examined. Besides the examination of crucial official/private witnesses I have to secure the relevant records from shell companies and examination some of the persons related to the companies, have to verify the huge volume of documents of shell companies to verify about the incriminating documents.
- 2) The bank accounts, other transactions details of Sri.Nara Chandrababu Naidu (A-37) have to be ascertained, further examination is required to establish how the amount has been routed/layered/received by the accused and how the amount was got back from the shell companies.
- 3) In view of economical offence orchestrated by the accused which occurred in sequence of time and in calculated manner, in view of hindrances created by the men of the accused, and on account of non cooperation of accused his intrinsic examination of could not be completed within 24 hours from the time of arrest.
- 4) Hence he is to be examined thoroughly and intrinsically on various aspects about the persons who met him, method adopted for funds diversion, records created and processed, rooting of funds and screening of funds.
- 5) The plan and method articulated by the accused A-37 with others in the deep rooted conspiracy, diversion, rooting and screening of funds and other facts which are within the knowledge of the accused are to be elicited.
- 6) The accused A-37 is an influential person having intimidation tactics. Because of influence and intimidator tactics adopted by the accused A-37 by direct and indirect means many difficulties have been faced and the evidence collected so far clearly established the role of the accused. He (A-37) is not co operating with investigation and much of information within the exclusive knowledge of the accused A-37 is to be elicited. Hence his (A-37) custodial examination is very much required.
- 7) To unravel the larger conspiracy of siphoning off funds of APSSDC in execution of Skill Development Project and the involvement of Govt. officials.

- 8) Since the issue involves misappropriation of at least Rs.279 crores in the Government project by routing back through shell companies and the trial of funds to be unearthed and the money has to be recovered.
- 9) The accused A-37 Sri.Nara Chandrababu Naidu (A-37) conspired with A-1, A-2, A-38, Suman Bose (A-6) and Vikas Khanvelkar (A-8) for diverting the funds issued fake invoices and routed the money with accommodation entries in the shell companies. The role of others in diversion of the funds is also to be established by custodial examination.
- 10) The offences involve Acts and sections of law attracting ten years of imprisonment.
- 11) The accused had strong ties with the Government machinery and highly influential person and are likely to intimidate other witnesses and destroy the evidence available in other places.
- 12) To prevent the accused from committing any further offence.
- 13) For the proper investigation of the case.
- 14) To prevent the accused from causing the evidence of the offence to disappear or tampering with such evidence in any manner.
- 15) To prevent the accused from making any inducement, threat or promise to the witnesses acquainted with the facts of the case so as to dissuade from disclosing such facts to the Court or to the Police Officer.
- 16) Unless the accused is arrested, his presence in the court whenever required cannot be ensured.
- 17) The gravity of a case is high magnitude, huge amount of government funds were misappropriated.

The arrested accused Sri.Nara Chandrababu Naidu (A-37) is being produced before the Hon'ble ACB Court with the escort Sri Ch.Sambasiva Rao, Inspector of Police along with HC.308 Sri P.Adireddy, PC.6523 B.Sambasiva Rao, PC.3943 Sri P.Srinivisa Rao and submitting remand report and other necessary documents. At the time of his (A-37) arrest, all necessary precautions were taken with respect to Covid-19 issued by Govt. from time to time.

PRAYER

In the light of facts and circumstances of the instant case, this Hon'ble Court may be pleased to:

- i. To pass an order granting 15 days judicial custody u/s 167 Cr.P.C. to the accused Sri.Nara Chandrababu Naidu (A-37)
- ii. To pass such other Order or further Orders as this Hon'ble Court may deem fit and proper in the interest of justice.

Be pleased to consider.


(M.DHANUNJAYUDU)
Dy. Supdt. Of Police,
EOW-II, CID, AP,
Mangalagiri.
Dt. 10.09.2023.

Enclosures for Arrest of A-37 and its connected documents:

SL. No.	Description of Document	Date of Documents	Page No.	
			From	To
1	Copy of Memo Dt.09.12.2021 of Addl.DG of Police, AP COD CID	09.12.2021	1	-
2	CD Part-I dated 09-12-2021	09.12.2021	2	71
3	Acknowledgement copy of FIR	09.09.2023	72	78
4	Accused adding Memo dtd.08-09-2023	08.09.2023	79	86
5	CD dated: 08.09.2023	08.09.2023	87	97
6	Arrest CD Dt. 09.09.2023	09.09.2023	98	116
7	Mediators Report dt.09.09.2023	09.09.2023	117	119
8	Handing/taking over of PP-02	09.09.2023	120	-
9	Section 50 (i) & (ii) CrPC notices	09.09.2023	121	122
10	Arrest Memo (1 page)	09.09.2023	123	-
11	Aadhar Card No.3003 0068 8099	-	124	-
12	Copy of Arrest information submitted to the Hon'ble Speaker, APLA, Velagapudi, Amaravathi.	09.09.2023	125	-
13	MoU/Agreement between APSSDC – Siemens – DesignTech	June-2015	126	135
14	G.O Ms.No.47 Higher Education (EC.A2)	10.09.2023	136	137
15	G.O. Ms No.4, SDE&I Dept., Approval (MoU)	30.06.2015	138	140
16	Siemens Internal Investigation Report	12.04.2019	141	153
17	DGGSTI Report			
18	Sri I.Y.R.Krishna Rao IAS (Retd.) – 161 (3) CrPC statement	17.09.2021	154	271
		07.04.2022	272	274