

Shri Ranjit Sinha, IPS
Director
Central Bureau of Investigation
CBI Building, CGO Complex
Lodhi Road, New Delhi 110003

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1st July 2013

Complaint against Shri Ramnish Geer SSP/CBI AC-1 for misconduct u/s 13(1)(d) of Prevention of Corruption Act, seeking registration of a RC/FIR.

Respected Sir,

I am taking the liberty of approaching you again in regards an urgent and important matter that directly concerns a venal officer of the CBI, Shri Ramnish Geer SSP (AC-1 branch).

In my previous letters addressed for your kind perusal, dated the 23rd January 2013; 3rd March 2013; March 18, 2013; 14th May 2013 and 18th June 2013, I had drawn your attention towards the conspiracy hatched by Shri Ramnish Geer against me and my wife Anca-Maria Verma to implicate us in false and fabricated cases of the CBI. **(Annex-1)**

In all of the above mentioned letters I had stated that there is a direct connection between Shri Ramnish and one C.Edmonds Allen of New York who has been circulating false and fabricated documents against me and my wife at the instructions of Shri Ramnish and Ashok Aggarwal IRS against whom I am an Approver of the CBI since 2001. Infact Shri Ramnish has become an interested party in the cases against my wife and I and is no more discharging his duties as an impartial CBI Officer.

Now, I am pleased to present before you the proof of the direct connection between Shri Ramnish and Allen in black and white below.

On the 28th of June 2013 at 03.25 am US time (17.55hrs IST), Allen posted a tweet from @CEAllen3 on my twitter profile (sheikabhi) which read as, "*@sheikabhi on google alert and I was amused to note how you describe your erstwhile friends like Ramnish and Aggarwal as my associates*". **(Annex-2)**

Just three hours later on the 28th of June 2013 at 07.51 am US time (22.19 hrs IST), Ramnish Geer SSP CBI added me as his connection from his twitter account @Ramnish1 and started 'following' my profile in order to read all the tweets posted on it.

It is clear that Allen after posting the above mentioned tweet on my profile, informed Shri Ramnish about it and to satisfy his curiosity and to surreptitiously monitor the postings on my twitter by Allen and others Shri Ramnish added me immediately as his twitter connection.

Probably Shri Ramnish was not aware that the settings of my twitter account are set in such a way that an automatic notification is generated as soon as a new twitter connection starts to follow me. The hardcopy of the automatically generated email in this case is attached herewith **(Annex-3)** which was provided to me by my lawyer who regularly updates and monitors my aforesaid twitter account.

You will notice that Shri Ramnish's profile is a genuine one as there are few other CBI officers added to his profile as well. The list of followers and connections of Shri Ramnish on twitter is attached **(Annex-4)**. Shri Ramnish has also been posting news and views about politicians and chatting with Barkha Dutt of NDTV from his twitter with an interesting tweet on 12th February 2012, "*@BDUTT Have you read the DNA Story: How to weaken CBI?*" As per my knowledge, no officer in CBI is permitted to interact with the media persons as there is a designated spokesperson for your organization. Therefore, Sh Ramnish chatting with a journalist and that too regarding negative news of your organization shows his in-disciplined mindset and lack of loyalty towards the organization. This act alone calls for a departmental action against him!

I am an accused in 6 cases of the CBI and an Approver in 1. It is highly unbecoming of an officer of the rank of Senior Superintendent of Police to be 'adding' and 'following' an accused of

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the CBI on his twitter profile. Furthermore, Shri Ramnish's close contact with Allen, who I have sued for fraud, forgery and breach of trust in a Delhi Court for embezzlement of Rs.55 crores and accumulated profits and damages on account of a NOIDA Real Estate transaction, reeks of misconduct as all the cases registered by the Anti-Corruption-1 branch of the CBI were at Shri Ramnish's behest citing the information received from Allen as source information. It is a glaring case of official misconduct and abuse of authority by a public servant and is covered under the "acts unbecoming of a public servant" as laid down in the CCS CCA Rules (Conduct Rules) and warrants initiation of a departmental enquiry besides the registration of a Regular Case/FIR against this officer immediately.

It is highly unbecoming of Shri Ramnish that he, being the CBI officer entrusted with the investigation of cases against me, is conspiring and hobnobbing with Allen, purportedly on whose false information, fake cases have been foisted my wife and I. Moreover, I am having a legal dispute with Allen and that is the reason for his tirade against me. Therefore, being a senior CBI Officer, Shri Ramnish is expected to be unbiased and just in his actions and investigations, which he has proved otherwise by his diabolical association with Allen as detailed above.

In my abovementioned previous letters, I had explained in detail about the misconduct of Shri Ramnish and how he used to regularly threaten and push me to settle issues with Ashok Aggarwal so that the case of the CBI against Aggarwal is demolished. **Shri Ramnish as the I/O of Ashok Aggarwal case received bribes as pecuniary advantage from Aggarwal** in the form of lakhs of rupees for buying the house in Dwarka, about which I had already provided details in my letter of 23rd January 2013 to your goodself.

Shri Ramnish had on many occasions threatened me that if I did not help Aggarwal, he would implicate me in several cases of the CBI. As I had committed to CBI regarding truthfully deposing against their accused Ashok Aggarwal, I did not budge under the threats and pressure. Sadly, Shri Ramnish actuated his threats and my wife and I were arrested in 4 new cases of the CBI and in one of which Shri Ramnish is a complainant himself (RC-SI-1-2012-S-0013). This shows the extent of personal grudge and vendetta Sh Ramnish holds against me.

The above acts of Shri Ramnish and his continued tirade against me at the behest of C.Edmonds Allen and Ashok Aggarwal tantamounts to Criminal Misconduct by a public servant and is a clear violation of section 13(1)(d) of The Prevention of Corruption Act, whereas, "while holding office as a public servant, obtains for any person any valuable thing or pecuniary advantage without any public interest".

In the instant case, Shri Ramnish has obtained pecuniary advantage for C.Edmonds Allen and Ashok Aggarwal with his several repeated acts of misconduct and malicious prosecution filed against me and my wife in the branch where he is posted at CBI. In fact Allen has benefitted financially by incarcerating both of us in judicial custody and as a result neither of us are in a position to pursue the cases filed against Allen in Delhi Court as detailed above. As far as Ashok Aggarwal is concerned, he has also hugely benefitted by my incarceration and has filed an Affidavit in Supreme Court on 10.11.2012 for dropping me as an approver against him stating that I cannot be a reliable witness as I have half a dozen CBI cases against me. I have been given to understand from my lawyers that CBI, acting on the letter of Shri Ram Jethmalani, advocate for Ashok Aggarwal, is seriously contemplating withdrawal of the case against Ashok Aggarwal in which I am the Approver. Thus, Shri Ramnish has been able to obtain clear pecuniary advantage for Ashok Aggarwal.

It is well settled law that, pecuniary advantage need not be connected with official duty. As distinguished from section 7 of the PC Act, "in order to be a criminal misconduct under section 13(1)(d) of the Act, the action of a public servant deriving pecuniary advantage need not be necessarily be connected with the performance of his official duty"; [State of UP vs. Kanhaiya Lal 1976 Cr.LJ 1230].

Further, it was also held that, "it is not necessary that a man must be effectively in charge of the work and the very fact that he was a public servant with the possibility that he is likely at some stage or the other to deal with such matter would be sufficient for the purpose of the section. If he has in such circumstances obtained for himself or for any other person a valuable thing or pecuniary advantage that would amount to abuse of his position; [KV Ayyaswamy AIR 1965 AP 105: 1965 (1) Cr. LJ 281]".

Therefore, it is proved that Shri Ramnish is guilty of misconduct and for hatching a conspiracy with C.Edmonds Allen, Ashok Aggarwal and others to implicate us in false cases of the CBI.

Abhishek Verma

In order to investigate the above allegations it is humbly requested that a FIR/RC is lodged by the CBI so that the investigators would be able to gain access to Shri Ramnish's phone & financial records, emails from his personal accounts as well as blackberry chats, Facebook and Twitter. Your investigators would also be able to investigate how he bought an expensive property in Dwarka for a mere few lacs when the actual price was much higher.

Sir, when under your esteemed leadership the CBI is seeking much more autonomy and independence and has a larger role to play in shaping the future of the nation, I am afraid that existence of such rogue, reckless, undisciplined and vengeful officers such as Shri Ramnish who have their personal axes to grind and are ethically, morally and financially corrupt, are a big mortal threat to the image and future of your organization. The evidence of their moral turpitude and their being unfit for holding such a senior post in your organization has been given in the above paragraphs.

I am hopeful that your goodself will treat this officer with the contempt he deserves and that Shri Ramnish Geer, SSP will be put immediately under suspension and a FIR will be lodged by the CBI to investigate the allegations and charges of misconduct against him and abuse of power as a public servant for obtaining bribes and gaining other pecuniary advantage for himself and my adversaries.

Thanking you in anticipation,

Yours truly,



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Abhishek Verma

Central Jail# 4, Tihar Prisons
New Delhi 110064

Copy to: Union Home Minister, New Delhi
Minister of State for Personnel & Public Grievances, New Delhi
Commissioner, CVC
Secretary, CVC
Shri Prabodh Kumar, Jt Director, Anti Corruption, CBI, New Delhi
Shri Sujeet Pandey, DIG, CBI (AC-1 branch), CBI HQ, New Delhi

Enclosed: Annexures 1 to 4
DoPT letter dtd 4th June 2013 reg.complaint against Shri Ramnish Geer SSP/CBI

No. 267/1/2013-AVD II (Pt. I)
Government of India
Ministry of Personnel, PG and Pensions
(Department of Personnel and Training)

New Delhi, dated 4/6-2013

To

The Secretary,
Central Vigilance Commission,
INA, Satarkata Bhavan,
New Delhi.

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Subject: Regarding complaint against Sh. Ramnish Geer, SSP AC I
branch, CBI and others in a matter pertaining to CBI
investigation against Sh. Ashok Aggarwal.

Sir,

I am directed to forward a copy of the letter dated 23.1.2013 along with its enclosures from Sh. Abhishek Verma addressed to Hon'ble Home Minister received vide MOS(PP)'s Diary No. 1213/MOS(PP) dated 10.5.2013 on the above mentioned subject for action as appropriate.

Yours faithfully,


(Rajiv Jain)

Under Secretary to the Government of India

Encl: As above

Copy for information to:

✓ Sh. Abhishek Verma, Jail 4, Tihar Prisons, New Delhi 110064

257/1/2013-AUD-VI

(112)

Encl: As above

Copy for information to:

✓ Sh. Abhishek Verma, Jail 4, Tihar Prisons, New Delhi

110064

Section Officer
Deptt. of Personnel & T.G.
North Block
New Delhi-110001



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ANNEX-1

The Director
Central Bureau of Investigation
CGO Complex
New Delhi

23rd January 2013

Respected sir,

I am taking the liberty of writing to you to complain about an officer of the CBI **Shri Ramnish Geer** SSP AC-1 branch and an accused of the CBI **Ashok Aggarwal** IRS former Deputy Director of Enforcement Directorate against whom I am an approver of the CBI Court in a case of corruption of the CBI (FIR# SIU-8-1999-E-0001 of 1999).

Due to my testimony under section 164 IPC tendered to the court of Metropolitan Magistrate Patiala House Courts on 2nd December 1999 against Ashok Aggarwal, I faced numerous problems and death threats due to which Delhi Police and CRPF provided round the clock "Y" category police protection at the recommendation of the CBI and MHA.

The said case of CBI has still not gone to trial as Ashok Aggarwal moved several frivolous court petitions and the case is presently stayed by the Supreme Court of India as my Approver status has been challenged by him through his longtime friend cum legal counsel Senior Advocate **Ram Jethmalani, MP**. (*Ashok Aggarwal helped Ram Jethmalani wriggle out of prosecution in a FERA enquiry against him in 1997 thus their special bond of friendship*).

During the pendency of the aforesaid case, I complained against Ashok Aggarwal in writing more than 50 times to Shri Ramnish Geer Sr Suptd of Police (SSP) CBI who was the I/O of the said case. However Shri Ramnish never responded to my letters nor took any action against Aggarwal, thus I had to escalate the matters to the then DIG and Joint Director CBI who immediately took necessary action in the interest of the case of the CBI and to protect their Approver.

In June-July 2006, I was blamed in a case of Official Secrets Act (OSA) of the CBI which was infamously known as the "**Navy War Room Leak Case**" (Case# ACU-9/CBI/2006). To my surprise Shri Raminsh was the I/O in this particular CBI case once again and during my custody at the CBI he pressurized me to settle my issues with Shri Aggarwal and come to an amicable settlement with him.

As the evidence against me in the Navy War Room Leak case was concocted and manufactured by Shri Ramnish the I/O of the case, High Court of Delhi was pleased to grant me bail in May 2008 however I ended up spending 22 months in judicial custody as an undertrial.

Shri Ramnish ensured that CBI moved a SLP for cancelation of my bail in the Supreme Court of India however the Hon'ble Judges of Supreme Court dismissed the SLP with strictures passed against the CBI. (Copy of the Supreme Court judgment of May 2009 is attached herewith as **Annexure-A**).

Between June 2008 and April 2012 – Shri Ramnish kept in touch with me and used to call my mobile number +919811432277 from his mobile, at least once in 3 months. Everytime he called me, it was with the sole purpose of pressurizing me to settle issues with Ashok Aggarwal and to end bitterness with him. He'd loose talk to me and say at times, "*I know what you are upto these*

Abhishek Verma

days, and I am keeping you under my scanner on a daily basis. I will put you inside again if I see you insensitive towards Aggarwal issue."

For a year or two Shri Ramnish was on deputation on a UN mission abroad, and that's the only period that Shri Ramnish did not pressurize me.

Towards the end of 2011, I had a commercial dispute with an American attorney **C.Edmonds Allen** from New York who had incorporated an Indian company **GANTON India Private Limited** in 2009 which was a 100% subsidiary of **GANTON Limited USA** of which Allen was the 100% owner as per his own admission. (Copy of said document of admission is attached herewith as **Annexure-B**).

C.Edmonds Allen and a Director of Ganton India Private Limited - **Shri Arjun Arora** had cheated me of appx Rs. 55 crores which was payment due for services rendered in a NOIDA property deal for 100 acres. I was constrained to file a case against C.Edmonds Allen and Arjun Arora in Saket District Courts on 2nd June 2012 prosecuting them for forgery, cheating, misrepresentation and under other sections of IT Act. (Copy of the criminal case against C.Edmonds Allen & Arjun Arora is attached herewith as **Annexure-C**).

In February 2012 Shri Ram Jethmalani MP & senior advocate who also represents Ashok Aggarwal in various courts wrote a D.O. letter dated 7th February 2012 to Shri Arun Mathur Director of Enforcement New Delhi stating that C.Edmonds Allen had sent him some documentary evidence against me about my alleged wrongdoings and foreign accounts and that Allen would be "*willing to help in the investigation if necessary by coming to India and providing ocular and documentary evidence.*" Shri Jethmalani added that, "*I write this as a citizen and a responsible Member of Parliament.*" (Copy of the said letter of Shri Jethmalani is attached as **Annexure-D**).

Isn't it surprising that of the 543 MPs in Lok Sabha and 232 in Rajya Sabha the only MP Allen contacted in India was Shri Jethmalani? It is quite clear that Ashok Aggarwal was/is in touch with C.Edmonds Allen and Ram Jethmalani is writing letters as directed by his client Aggarwal. (*How did Ashok Aggarwal get in touch with C.Edmonds Allen? Well, I had mentioned to C.Edmonds Allen about Ashok Aggarwal and my case against him during Allen's visit to New Delhi in May 2010, and this happened during a meeting with my legal team and lawyers at my residence in which Allen was present - while discussing the forthcoming Supreme Court SLP hearing against Ashok Aggarwal. Subsequently Allen researched the internet and found plenty of articles from circa 1999-2001 about the said controversy and got in touch with Ashok Aggarwal through Arjun Arora a director of Ganton India Private Limited who had assisted C.Edmonds Allen in defrauding me in the NOIDA land deal in 2011.*)

Alongwith the aforementioned letter of Shri Jethmalani, there were several forged documents and emails annexed purportedly written by me to Allen and others from bogus accounts such as evaherzigova@gmail.com These forged documents form a part of my criminal complaint case in Saket Court against Allen on 2nd June 2012 much before the present CBI case of Official Secrets Act (*in this OSA case I am in judicial custody at present*) was registered against me.

One of the documents in the said bunch forwarded by Shri Jethmalani to Director Enforcement is a three page letter of Shri Ramnish dated 20th April 2009 purportedly written to Interpol Wing of the CBI. (Copy of the said letter of Shri Ramnish is attached as **Annexure-E**).

This document too was a part of my criminal complaint against C.Edmonds Allen. However Shri Ramnish registered yet another FIR with the CBI in the 3rd week of September 2012 at SC-1 branch about the alleged forgery of this purported letter even though Shri Ramnish knew very

well that I was the complainant in the a criminal case about the very same letter much before he complained and the Metropolitan Magistrate SuryaKanta Malik Grover of Saket District Courts had taken cognizance on my complaint on the 2nd June 2012. In fact I was the one who had brought this complaint against Allen in regards the forged letter to Shri Ramnish's attention when he barged into my residence on the 7th of June 2012 during the CBI raid even though he was not a part of the raiding party!

In the same bunch of documents circulated by C.Edmonds Allen there were emails exchanged between C.Edmonds Allen and known blackmailers Advocate **Prashant Bhushan** and **Arvind Kejriwal's Parivartan Trust** whereby both were planning a media blitz by using these false and fabricated emails to launch criminal cases against me. Prashant Bhushan attached his own emails with C.Edmonds Allen in the said bunch of documents released to the press and media.

It is evident that Ashok Aggarwal put C.Edmonds Allen in touch with Shri Prashant Bhushan as well as with Shri Ram Jethmalani who wrote the above letter(s) to Enforcement Directorate at the instructions of his client Ashok Aggarwal to discredit and exert pressure on me.

Due to all this stress I suffered a heart attack and was admitted to Escorts Heart Institute Delhi on the 23rd of April 2012. An angioplasty was conducted on the 26th April 2012.

On June 5, 2012 at 5pm the CBI registered a fresh case of corruption u/s PC Act against me and raided my residence on the 7th of June. During this raid Shri Ramnish barged into my premises between 8am and 10am - even though he had nothing to with the said case and threatened me in front of my Romanian wife Anca-Maria Verma in English that, *".....because of you, I have suffered enough and as you (Abhishek Verma) haven't settled your issues with Ashok Aggarwal, I will ensure this time you are screwed nice and proper and you and your wife are inside for a long long time. I am the blue eyed boy of the Director CBI and nobody in the CBI knows you better than me."* (Mobile records and tower locations of Shri Ramnish of that day morning will prove that he was present at my farmhouse in the morning even though he had no business to be present there).

My wife **Anca-Maria Verma** and I were taken into custody in the evening of 7th June 2012 (although our arrest was shown at 7.30pm of 8th of June 2012). We were made to sign several unsealed packets containing harddisks, papers while we were in their custody and were pressurized to backdate the date of sealing as 7th of June 2012 (prior to our arrest).

There was no reason to arrest us since the passport of my wife had already been impounded by the CBI during raid and my passport was with the CBI court since 2006 and we were cooperating with the CBI in all the cases.

CBI secured police custody remand of 12 days in the said case of corruption and during custody Shri Ramnish made it a point to prejudice the mind of the upright and honest officers of the CBI and the I/O of the present case **Shri Ram Singh DSP (AC-1)** and **Shri Ashwani Chand IPS (SP AC-1)**, present during custodial interrogation. I had also expressed my objection on several occasions to the concerned officers in regards the presence of the Shri Ramnish Geer during my custodial interrogation.

On almost all the days of our interrogation Shri Ramnish was present even though he had no business to interfere in the said case. Furthermore, during our 12 days custody at the CBI HQ, I noticed several journalists from Times Now, Indian Express and entering the cabin of Shri Ramnish. Once he called me inside his cabin and introduced me to a female reporter with short blunt cut shoulder length hair who covers CBI and was working for Times Now (*I can identify her if shown a photo and I believe she now works for NDTV news*). Shri Ramnish told me that

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the channel is doing a major story on me and my wife so he is providing them some juicy inputs about my social life and how big a womanizer I am and showed me some photos that C.Edmonds Allen had sent to the CBI. Over the next few days I noticed several unpleasant stories appeared in the press (*especially Punjab Kesari front page*) due to information about the investigation leaked by Shri Ramnish and all these stories were attributed to “**CBI sources**”. A close friend of mine was told by the owner of Punjab Kesari **Shri Ashwini Minna** that Shri Ramnish of CBI provided his correspondent all these ‘spicy’ photos that his editors published on page 1 of the newspaper between July and August 2012.

One of those 12 days of police custody remand the Romanian Ambassador H.E. Mrs Valerica Epure visited CBI HQ through proper channel to meet my wife Anca-Maria Verma who is a Romanian national. During this meeting about the welfare of my wife, I/O Shri Ram Singh DSP, a SP of Interpol Branch, Shri Ashwini Chand SP-1 of AC-1 branch and Shri Ramnish were present. Shri Ramnish made it a point to humiliate my wife in front of the Ambassador by statements such as, “*Anca has married a notorious criminal and because of Abhishek she too won't see the light of the day for years to come and will rot in jail.*” The others present in the room were shocked at Shri Ramnish's behavior and loose talk in front of the Ambassador of Romania. She too was upset and felt humiliated due to Shri Ramnish and shot back that, “*Sir, I am not here for Abhishek but I am here to meet a citizen of my country and please maintain decorum before me.*”

Thereafter three more cases of the CBI were registered against me based on cooked up and forged documents supplied by Allen from New York – sent to the CBI by emails and letters. All this was done at the instructions of Ashok Aggarwal who was now the best friend and guide of Allen. Ashok used to guide Allen who to address these complaints to and Allen sent letters of complaints to Ministry of Defence, Prime Minister's office, Home Ministry, FRRO, CVC and Enforcement Directorate etc.

During the 10 days police custody remand (4th Sept to 14th Sept 2012) of the Official Secrets Act (OSA) case registered against my wife and me, Shri Ramnish Geer left no stone unturned to influence the independent witnesses being called to the CBI HQ for investigation and personally perused the case diaries as well as motivated and pressurized the I/O of the said case **Inspector Rajesh Solanki** of AC-1 branch. Shri Ramnish also used to influence the SP incharge of the case **Smt Meenu Choudhry** IPS (SP-III of AC-1 branch) and tried to brainwash an honest officer **Shri Praveer Ranjan** IPS (DIG of AC-1 branch) against me and my wife. All these antics of Shri Ramnish took place brazenly in front of us during the 10 day period. During these 10 days, Shri Ramnish told me in no uncertain terms that he will fix me and my wife for good 1-2 years in jail with this OSA case.

Not even once did the CBI secure the presence of Allen and confront me / my wife with Allen and nor were Allen's statement recorded by the CBI even though several crores of Rupees were spent by the CBI team visiting New York in the month of October 2012.

The team was led by Special Director of CBI **Shri VK Gupta** in October 2012. The statement of Allen recorded by Enforcement Directorate under Prevention of Money Laundering Act (PMLA) and not under Cr.PC however this statement u/s PMLA cannot be used in other proceedings under Cr.PC as it is a well-settled law.

The reason why CBI did not record Allen's statement and did not make him a witness (or an approver) was because Allen did not want to depose in Indian courts at a later stage nor did he want to confront me because he knew that he could be booked himself for providing forged evidence against an accused and for misleading the CBI and also due to the fact that he did not want to appear as a Defendant in the criminal complaint filed by me in Saket district courts.

Ashok Aggarwal used his connections with the CBI namely Shri Ramnish and his friends at the PMO and other Ministries to exert pressure and to guide the investigation in a certain manner in order to file a concocted 'incomplete' chargesheet on the 30th November 2012 u/s Official Secrets Act in the Court of Chief Metropolitan Magistrate on the last working day of the 90 days period of investigation knowing quite well if they don't file a chargesheet, my wife and I would have secured statutory bail u/s 167(2) Cr.PC the next day.

During the CBI custody I reliably learnt from one of the officers of the CBI that Shri Ramnish and Ashok Aggarwal are in touch with each other through one **Shri Ashok Singh** former Congress MLA of RK Puram assembly (*Ashok Singh was also known to me and he is the person who had introduced Ashok Aggarwal to me in 1997 – however I fell out with Ashok Singh a few years back on Ashok Aggarwal issue since he too kept on insisting everytime to retract my u/s 164 IPC statement against his friend Ashok Aggarwal*).

On 10th November 2012 Ashok Aggarwal filed 235 pages in the Supreme Court of India as additional affidavit challenging my Approver status and dozens of these documents are letters of C.Edmonds Allen written to the Prime Minister's office. (Copy of the said additional affidavit duly flagged is attached herewith as *Annexure-F*).

Now, either Ashok Aggarwal secured these documents from the PM's office surreptitiously causing a breach of Official Secrets Act (OSA) OR he is directly in touch with Allen in New York who is being guided by Ashok Aggarwal on each step.

I have reliably learnt from one of the officers of the CBI that Shri Ramnish received a hefty bribe in the form of a flat in Dwarka in a building society of **Shri Ajit Singh** who was an accused in the DDA Society Scam in August 2006 and Ajit Singh was also arrested by the CBI. The registration value of his flat is only a few lacs however the black market amount (*premium*) was paid to Ajit Singh builder by Ashok Aggarwal through Shri Ashok Singh as a part of the deal to exert pressure & to fix me.

Ashok Aggarwal also compromised one of my trial court lawyers **Virendra Singh Rawat** and induced him to file several forged affidavits in favour of Aggarwal in various courts. I had complained to the CBI and Bar Council of India against Rawat in January 2011 and again on 28th December 2012. (Copies of complaint filed before Joint Director CBI is attached herewith as *Annexure-G*).

Apart from the above, Shri Ramnish who is the investigation incharge of **Ravi Rishi's** TATRA Trucks case, introduced me to Ravi Rishi during my police custody remand in September 2012 on a Sunday in his cabin at the CBI HQ. Shri Ramnish asked me if I knew Ravi Rishi to which I replied affirmatively and told him that we know each other socially as his father **Late JC Rishi** hailed from Bilaspur, Chattisgarh and my father **Late Shrikant Verma** also elected as a MP from the same district. After this Shri Ramnish decimated my reputation in front of Ravi Rishi and said to him that, "...*Had Abhishek learnt a lesson or two from you (Rishi) in winning over friends in the CBI, he (Abhishek) probably wouldn't have been in our custody just now...*". After Rishi left the building Shri Ramnish asked me if I have reconsidered my decision about Ashok Aggarwal matter? At this point, I was quite told him bluntly that, "...*I will continue to support the CBI in the trial court as an approver no matter how much you threaten me with consequences!*" You may please confirm with Ravi Rishi if Shri Ramnish introduced us during September 2012 police custody and if Shri Ramnish made the statement about '*winning over friends in the CBI*' or not?

My wife who is just 34 yrs and I are suffering immensely and languishing for the past 7 months in Tihar Jail due to one case or the other which is foisted upon us by the CBI as soon as we

Abhishek Verma

secure bail in the previous case(s). It is extremely unfortunate that we were arrested just 5 days after our marriage on the 3rd of June 2012. As we both have been detained u/s OSA sec (3) which carries punishment of upto 14 years, I am given to understand from some officers of the CBI that we both will not receive sympathetic consideration from any quarters even though there is no recovery of 'secret documents' from our possession and every shred of 'so called evidence' has been planted upon us by an evil man in New York who I had sued much before the registration of the CBI cases against my wife and I and this evil man C.Edmonds Allen is not even a witness or an approver or an accused in the said case of the CBI. We both may be exonerated by Hon'ble trial court in a few years from now, but who will return the time spent in jail without any fault of ours?

I have a 72 year old mother **Smt Veena Verma** admitted to the ICU of Ram Manohar Lohia Hospital Delhi, as she suffered a Right Body Paralytic Attack three days back and there is no one to look after my mother since I was the only child of my parents. My wife's 65 year old parents in Romania are suffering as their only daughter is incarcerated in India and they are too old to travel to India alone so haven't been able to visit her. In all, our lives are completely shattered and destroyed all due to Shri Ramnish and Ashok Aggarwal conspiring together and having us jailed on false cases registered by the CBI at the behest of C.Edmonds Allen playing in the hands of Ashok Aggarwal.

Keeping in view the entire facts and circumstances of the complaint above, I humbly request you to please register a FIR against Shri Ramnish Geer, Ashok Aggarwal, Virendra Singh Rawat and C.Edmonds Allen and others and investigate them for: forgery, suppression of evidence, conspiracy, influencing approver of the CBI and for malicious prosecution.

With high regards,

Yours truly,



Abhishek Verma
Jail-4, Tihar Prisons
New Delhi 110064

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Enclosed: As above as attachments in the binder.

The Director
Central Bureau of Investigation
CGO Complex
New Delhi

3rd March 2013

Respected Sir,

I am taking the liberty of approaching you once again to follow up on the action taken in regards my earlier complaint dated 23rd January 2013 against SSP AC-1 branch of the CBI **Shri Ramnish Geer**.

Shri Ramnish is continuing his tirade against me & my wife as he is now working solely for the benefit of **Ashok Aggarwal, IRS** former Deputy Director of Enforcement Directorate against whom I am the Approver of the CBI.

Attached, is an extremely defamatory newsarticle published in the Times of India dated the 3rd of March 2013 wherein the *source* of the story is attributed to “*a CBI official who was investigating Verma.*” Shri Ramnish was the I/O in two of my cases (RC-SIU8-1999-E-0001 against Ashok Aggarwal and ACU-IX-2006/2A titled **Navy War Room Leak** Case). The author of the said newsarticle Shri **Abhinav Garg** has written that the official who “*was*” investigating Verma, thereby implying it is Shri Ramnish. Thus the *source* is none other than Shri Ramnish who spoke to the Times of India in the most derogatory language and leaked details of the investigation in **Rheinmetal Air Defense** case RC-AC1-2012-0009 thereby influencing the investigation and prejudicing the minds of the judiciary.

This is not the only instance wherein attempts were made by Shri Ramnish to prejudice the judiciary and decimate my reputation which is already in shards.

Right from June 2012 when CBI first arrested my wife and me, since then Shri Ramnish systematically leaked stories to the press/media. In my letter of 23rd January 2013 addressed to your goodself, I had mentioned how Shri Ramnish used to call mediapersons to his cabin in front of me and my wife (*during our CBI custody remand on 3 occasions totaling 27 days*) and leaked stories and photos of us. I am attaching news clippings from the past that quote “*reliable sources of the CBI*” or “*a senior officer of the CBI*”. Effectively the source of these

Abhishek Verma

stories was not the official spokesperson of the CBI but a mole in the CBI working for personal benefit and influencing the investigation(s) and the judiciary.

Shri Ramnish is definitely the source of all these engineered leaks. One of my lawyers **Shri Gaurang Kanth's** brother **Shri Prityush Kanth** is the Business Editor of Times of India New Delhi. On one of the visits to Tihar Jail in June-July 2012 Gaurang Kanth specifically mentioned to me that Shri Ramnish had been leaking information to Times of India and Times Now reporters about my cases.

These acts of Shri Ramnish are highly deplorable. A departmental enquiry should be initiated against the officer and his links with Ashok Aggarwal and the call detail records of Shri Ramnish be extracted from June 1, 2012 till date and he should be asked to explain why he has been in touch with the press persons when he was not authorized to do so.

Further, it is humbly requested that the enquiry should cover all aspects of these leaks and the call detail records of all other officers of AC-1 branch should be examined to validate if any other officer were also involved and if so action should be taken against all erring officers.

It is also suggested that the authorized spokesperson of the CBI should be the only one to brief the media persons about the status of various cases (but not about the details of the investigation); any other officer indulging in information leaks to the press should face departmental action.

With high regards,

Yours truly,

-SIGNED-

Abhishek Verma
Jail# 4, Tihar Prison
New Delhi 110064

Enclosed: As above.

Abhishek Verma

Mrs. Seema Pahuja, Inspector
Special Crimes-1 Branch (SC-1)
Central Bureau of Investigation
Lodhi Road, New Delhi 110003

18th March 2013

Subject: Assisting investigations of the CBI in RC-SI-1-2012-S-0013 of 19 Sept 2012

Madam,

Concerning the above mentioned FIR being investigated by you in which I have been named as an accused – I would like to bring to your kind notice certain facts and submit documents to assist you in the investigation in regards the source and the identity of the forger of the questioned letter of Shri Ramnish Sr.Supt. of CBI AC-1 Branch.

Claxton Edmonds Allen an attorney from New York in conspiracy with one **Ashok Aggarwal** IRS officer forged the letter of Shri Ramnish for the reasons enumerated below:

1. I am an approver of the CBI court against Ashok Aggarwal in a case of corruption since the year 1999 (RC-SIU-8-1999-E-0001). Since the inception of the said case Shri Aggarwal tried to influence and threaten me, as a result of which, I was granted 'Y' category police protection at the recommendation of the CBI for 7 years. You may be able find over 2 dozen complaints filed by the undersigned against Ashok Aggarwal between the years 1999 and 2013 in the records of SIU-8 branch.
2. I got to know about the existence of the forged letter of Shri Ramnish from reliable journalists who attended the press conference on 26th April 2012 organized by Shri **Arvind Kejriwal** former IRS officer (*close friend of Ashok Aggarwal*). Thereafter I obtained a copy of the documents circulated by Shri Kejriwal at this press conference held at the behest of Ashok Aggarwal and C.Edmonds Allen with the sole purpose of implicating me in frivolous cases by misleading the CBI and Enforcement Directorate. The forged letter was annexed at pages 95, 96 and 97 of the attached bunch of documents released by Shri Kejriwal to the media. These are being submitted for your kind perusal along with this letter. I was in Escorts Hospital for angioplasty from 22nd April till 30th of April 2012 and on bed-rest the entire month of May 2012.
3. On 2nd of June 2012, I filed a criminal case u/s 389, 420, 465, 467, 468, 469, 471, 474, 500 of IPC and 66A, 66C, 66D, 66F of Information Technology Act read with 120B IPC against C. Edmonds Allen and his business partner in India one NRI **Arjun Arora** (*who was a school friend of mine from 1980's*). The said complaint was filed in the court of Ld.Metropolitan Magistrate Mrs.Suyra Malik Grover, Saket District Courts, New Delhi and the Ld MM was pleased to take cognizance on the said complaint on the 4th of June 2012.
4. It is important to mention here that the forged letter of Shri Ramnish was one of the several documents that were a part of my complaint against Allen & Arora - filed before Ld MM Mrs Grover at Saket Courts on 2nd June 2012.
5. On the 7th of June 2012 morning when CBI raided my residence 2,Church Road, Vasant Kunj, New Delhi in connection with a CBI FIR (RC-2012-AC1-0009) - Shri Ramnish was also present between

Abhishek Verma

7.30am and 10.30am along with the other officers of the CBI. In presence of my wife, I brought this matter to his knowledge that, *“I had filed a complaint of forgery in the Saket Court against Allen & others and the forged letter of his (Shri Ramnish) is also a part of the complaint.”*

6. Thereafter during my CBI custody remand along with my wife **Anca Verma** from 8th of June till 21st June 2012 at my instructions, one of my lawyers who was authorized by the Court to visit us daily between 4pm and 6pm submitted a photocopy of the entire set of the aforementioned complaint along with its annexures to the I/O **Shri Ramsingh** at the AC-1 branch.
7. Allen and Aggarwal are in touch with **Prashant Bhushan** Senior Advocate who is a close associate of Arvind Kejriwal. They jointly run **Parivartan Trust** and both persons formerly known as members of **Team Anna**. *(Please refer to emails exchanged between Allen and Prashant Bhushan in April 2012 – pages 98 and 106 of my attached complaint to Saket Court).*
8. Prashant Bhushan is the same person who had filed a Public Interest Litigation (PIL) in March 2006 against Union of India & others – seeking directions of the Delhi High Court to register a FIR against Public Officials and the undersigned to investigate Scorpene Submarines purchase of the Indian Navy & the allegations of bribes paid through the undersigned. Prashant Bhushan had annexed certain forged and fabricated emails as evidence. Those emails as claimed by Prashant Bhushan were purportedly written/sent by the undersigned. The CBI registered a P.E. and the I/O (of this P.E.) Shri Ramnish investigated the allegations leveled by Prashant Bhushan and submitted to the Delhi High Court a confidential report, parts of which were read out in the open court by the Chief Justice sometime in 2008. It was observed by court that, *“the questioned emails were not authenticated after detailed enquiry with the French Government and appeared to be fabricated. No bribes were paid as confirmed by the French Government and the manufacturer Thales”*. The court also observed that the bank remittances to Shri Verma were not connected to the Scorpene deal / Thales the manufacturer. I was exonerated by the Delhi High Court. This was widely reported in the media. Newsarticles to this effect are still available on the net.

Even though I was exonerated by the Court after detailed investigations by the CBI, the petitioner Prashant Bhushan continued to harass the undersigned, the CBI and falsely alleged that the CBI was acting hand-in-glove with the undersigned to cover up allegations of bribery in the Scorpene deal allegedly paid to senior political leaders routed through the undersigned. This campaign against was fuelled by Ashok Aggarwal who was forging documents/emails and guiding Prashant Bhushan all along through his longtime friend Arvind Kejriwal.

9. When Allen+Arora and the undersigned fell out towards the end of October-November 2011 over a dispute in NOIDA 100 acres land for township (TS-3 Yamuna Expressway), Allen got in touch with Ashok Aggarwal through Arjun Arora who was at the time based in Delhi. An enemy's enemy is a friend, thus Aggarwal guided Allen how to create forgeries to implicate the undersigned & my wife in multiple false cases by misleading the CBI and ED.
10. Aggarwal introduced Allen to his longtime friend and lawyer **Ram Jethmalani** MP and Jethmalani wrote a letter of complaint to the then Director of Enforcement Directorate on 7th February 2012. The said letter is annexed on page 51 of the complaint filed in Saket Court. Please note that the last paragraph of Jethmalani's letter states, *“The enclosed correspondence and papers point to the notorious Abhishek Verma a protected favourite of the CBI and powerful politicians. He seems involved in ownership of US\$205,000,000. Mr.Allen will be willing to help in the investigation if*

necessary by coming to India and providing ocular and documentary evidence. I write this as a citizen and a responsible Member of Parliament.” Alongwith the above mentioned documents to the Director Enforcement, Jethmalani annexed the forged letter of Shri Ramnish.

11. Ram Jethmalani misled the Director ED by suppressing that he was infact the lawyer for Ashok Aggarwal against whom I am an approver of the CBI since 1999 and Jethmalani has been representing Aggarwal regularly in trial court, High Court and Hon'ble Supreme Court as at present my approver status is under challenge by accused Ashok Aggarwal. The SLP is still pending before the Chief Justice of India and the trial court proceedings have been stayed.

There are 543 MPs in Lok Sabha and 232 in Rajya Sabha. Out of 776 MPs in Indian Parliament, why is it that Allen got in touch with only Ram Jethmalani, who conveniently wrote a complaint two days later to the Director Enforcement “...as a citizen and a responsible Member of Parliament.”

12. Contrary to Jethmalani's letter of 7th Feb 2012 to the Director Enforcement – Allen has refused to come to India for being examined by the CBI nor did he allow the officers of the CBI and Enforcement Directorate to seize the original hard-disk of his personal computer when they visited New York in October 2012. Instead Allen handed over to the ED officers doctored emails (e-formats) and fabricated documents to mislead the investigators. If Allen is such an honest person as he is portrays himself to be – then why does he not join investigation in India and submit himself to the jurisdiction of the Indian agencies and courts?
13. If Allen had in his possession of the questioned letter of Shri Ramnish since 14th July 2009 (*as per his email trailers appearing on page 104 of my complaint to Ld MM Saket*), why on earth was he quiet for 2 years and 10 months and started complaining to the ED, CBI, Ram Jethmalani and Prashant Bhushan only in February 2012 onwards? This proves that the emails were backdated electronically by changing time and date of the sender & receiving PCs and by changing a IP address using an IP changer software. The questioned documents were forged by Allen and others only after the disputes arose over NOIDA real estate deal. They tried to connect me again to the Scorpene deal because the contents of the forged letter page 2 clearly mention the name of Thales (*manufacturer*) and Scorpene (*submarines*).
14. Prashant Bhushan utilized this forged letter once again to prejudice the judiciary and submitted this forged document in the year 2012 to the concerned bench of Delhi High Court in the proceedings of the aforementioned PIL seeking re-investigations in the Scorpene deal. Bhushan also held several press conferences opposing the Presidential candidature of His Excellency Shri Pranab Mukherji in July-August 2012 while leveling extremely defamatory allegations against him since Shri Mukherji was the Defence Minister in 2005 when Scorpene deal was signed.
15. Ram Jethmalani and Ashok Aggarwal have carried a grudge against the CBI since 1999. Aggarwal filed nine frivolous cases against the CBI officers & a former Joint Director of CBI investigating his cases. Aggarwal even put a *supari* on the life of these officers due to which three of the CBI officers & former Jt. Director received round the clock Delhi Police protection from August 2001 till 2005-2006, including Shri Ramnish.
16. Ashok Aggarwal compromised one of my former lawyers Virendra Singh Rawat and together they forged an affidavit with my signatures to be used in Aggarwal's defense in the Supreme Court of India. Aggarwal brazenly filed the said forged affidavit in the SLP challenging my Approver status. When I got to know sometime in November 2012 as I received a set of documents from SC registrar,

Abhishek Verma

I immediately complained to the Joint Director CBI seeking registration of a FIR against Aggarwal & Rawat for forgery and for tampering with evidence (copy attached). I also filed an application in January 2013 for cancellation of Ashok Aggarwal's bail in the court of CBI Judge ASJ VK Maheshwari, Tis Hazari Courts. The said application is pending consideration.

17. C.Edmonds Allen & Aggarwal conspired to forge the questioned letter in order to frame me in yet another case of the CBI. Further the tone of Allen's email and Jethmalani's letter allege that, "*Abhishek is protected by the CBI*", which is not true at all as I am facing 7 cases of the CBI including this one, and all such false allegations are malicious attempts of Allen and Aggarwal in order to antagonize the officers of your department.

You are requested to please investigate the points as mentioned above as well as consider the conduct of C.Edmonds Allen & others. Please investigate thoroughly all aspects since my wife and I are victims of a conspiracy hatched by Allen & others. We have nothing to do with the questioned letter; rather, I am the one who filed a criminal case against Allen for forgery of the same last year in June.

Further, it would not be out of place to mention here that my wife Anca Verma and I are keen to join investigations and that is why we both applied to the Court of Ld CMM Tis Hazari courts to surrender in the aforementioned FIR in October 2012 however your department declined to arrest us.


As my wife Anca Verma and I both are keen to be examined by CBI to prove our innocence and to shed light on all the aspects of the conspiracy hatched by Allen & Aggarwal and in order to assist in your investigations.... you may please arrest both of us in the above mentioned FIR, to be examined in custody of the CBI. Alternatively, you may please record our statements tendered voluntarily in Jail 4, and examine Anca at Jail 6 Tihar Prisons.

Assuring you of our cooperation in advance,

Yours truly,

- SIGNED -

Abhishek Verma
Jail 4, Tihar Prisons
New Delhi 110064

CC:  Director, Central Bureau of Investigations, CBI HQ, New Delhi

Attached: As above.

Abhishek Verma

Mr. Ranjit Sinha, IPS
Director CBI
CBI Headquarters
CGO Complex, New Delhi-110003

May 14, 2013

CONFIDENTIAL



Respected Sir:

At the outset, I would like to congratulate you for the recent bold initiatives taken under your leadership to free CBI from the clutches of the Executive & Political interference and turn it into an independent Investigation Agency.

My wife **Anca-Maria Verma** and I are victims of such interference in investigation by powerful lobbies spearheaded by **Mr.Pulok Chatterjee**, Principal Secretary to Prime Minister of India, in CBI cases launched against us from June 2012 onwards.

Mr. Pulok Chatterjee's proximity to **Mr. Vincent George** (former PS to Late Rajiv Gandhi) is well known due to Mr. Chatterjee's stint at the Rajiv Gandhi Foundation 10 years back.

In 1999-2000, I had turned an Approver of the CBI against a corrupt IRS officer **Ashok Aggarwal** and during investigation in Ashok Aggarwal's cases, the name of Mr. Vincent George cropped up who had helped Aggarwal secure posting as PS to Mines Minister **Late Balram Singh Yadav** and thereafter as the Deputy Director of Enforcement Directorate (Delhi Zone).

I had assisted CBI investigations in the financial affairs of Mr. Vincent George and identified his *benami* properties by disclosing certain privileged information, as a result of which Mr. George became my enemy and he ensured that my mother **Mrs. Veena Verma** was not renominated to Rajya Sabha in July 2000. I had complained to the CBI by the way of a letter about the political pressure exerted by Mr.George on me in the month of December 1999 the contents of which were published that month by the **India Today**.

The entire controversy about Ashok Aggarwal and Mr. George was efficiently supervised by **Mr.O.P.Galhotra** Joint Director CBI who at that time was the SP CBI (SIU-8 branch). The then senior officers of the CBI including then acting Director CBI **Mr.P.C.Sharma** were subjected to extreme pressure by **Mr.Brijesh Mishra**, Principal Secretary to the Prime Minister **Mr. Atal Bihari Vajpayee** to shut down this case as Mr. George and Ashok Aggarwal had cross border links with **Mr.Ranjan Bhattacharya** the foster son-in-law of Mr.Vajpayee.

However these honest officers of the CBI did not give into any kind of pressure and continued with fair and unbiased investigations as a result of which Ashok Aggarwal was chargesheeted in two cases and has remained under suspension from December 1999 till date. Mr. George and his wife **Mrs. Lily George** faced an inquiry of the CBI u/s Disproportionate Assets and that of Enforcement Directorate u/s Foreign Exchange Regulation Act and in both the cases I was a key witness.

In 2012, when one **C.Edmonds Allen** from New York at the behest of Ashok Aggarwal mass mailed several fabricated documents and emails to the **Media Houses, Team Anna, PMO, Ministry of Defence, CBI** and the **ED**, I am given to understand from most reliable sources that Mr.Pulok Chatterjee showed undue interest in cases against us and regularly interfered in the CBI investigation. He held several meetings with the then CBI Director **Mr.A.P.Singh** to pressurize him to book us in multiple cases and apply the most stringent law of Official Secrets Act without waiting to authenticate the claims and allegations of C.Edmonds Allen.

While Mr. Chatterjee was applying pressure from the outside – **Mr.Ramnish Geer** SSP CBI (AC-1 branch) was acting as a catalyst within the CBI to influence the investigations since he was the point person of Ashok Aggarwal and he had been compromised by Aggarwal long back. (I had provided

specific details of the role played by Mr. Ramnish Geer in my letters addressed to your kind goodself dated 23rd January 2013, March 3, 2013 and April 5th, 2013 enclosed herewith as Annexure-A colly).

I regret that due to the fear of reprisal, I did not bring the above facts about Mr. Chatterjee and his proximity to Mr. V. George and Ashok Aggarwal in your knowledge in my earlier letters. However I did make a mention of it obliquely in my letter to your goodself dated 23rd January 2013 (page 5 - paras 3 and 4) a copy of which is attached in the above Annexures collectively.

With the events of the past one week in regards the Railways 'cash for job' scandal and pursuant to Hon'ble Supreme Court's observations in the 'Coal blocks allotment' controversy, I am confident that going forward CBI will remain insulated from political interference and executive pressure especially under your leadership for free and fair investigation no matter how powerful the lobbies may be!

Therefore, I take this opportunity to put forward some important facts for your kind perusal and necessary action:

1. In the CBI FIR u/s Official Secrets Act (RC-AC1-2012-A0012) sanction to file Complaint u/s OSA was received from **Ministry of Home Affairs** on 29/11/2012 and the chargesheet of the CBI was filed on the 30/11/2012 in a Delhi court. MHA sanction was received against, myself, Anca Verma, **Wing Commander (retd) Koka Rao** and M/s **GANTON Limited**, USA whereas one of the names of the accused in the chargesheet was fraudulently manipulated by the I/O of the case **Mr. Rajesh Solanki** who misled Superintendent of Police **Mrs. Meenu Choudhry** (Anti Corruption-1 branch) of the CBI and replaced the accused M/s **GANTON Limited** with the name of M/s **GANTON India Private Limited** the Indian subsidiary of GANTON Ltd USA. My wife Anca Verma is a Director of the Indian subsidiary.

This fraud was perpetrated at the instructions of 'powerful lobbies' to ensure my wife Anca Verma is falsely implicated in the OSA case even though there wasn't an iota of evidence against her. (Copy of the MHA sanction & relevant pages of the chargesheet attached at Annexure-B colly).

Powerful lobbies wanted to protect Allen who owns 100% shares of GANTON Limited USA about which Allen has admitted in several of his letters to the CBI and also in his statement tendered u/s PMLA to the Enforcement Directorate recorded by the I/O Mr. Pankaj Khanna in New York in October 2012.

Had the CBI named GANTON Limited as an accused then Allen would have had to represent the said company in criminal trial and be arrested as an accused since the other three accused (including myself) are in judicial custody.

2. C. Edmonds Allen has been leaking secret documents to the press, media and public from New York since 2012 openly violating OSA. As a proof of my claim I am attaching an email received on my Gmail from Allen on 30/04/2013 alongwith a letter dated 8th March 2013 he wrote to the MOD / MHA authorities and the CBI. This email was intended for **Mr. Abhishek Shukla**, Principal Correspondent PTI (**Press Trust of India**) New Delhi but while typing the name of the recipient in the 'TO' box – it appears Allen selected '**Abhishek Verma**' instead of '**Abhishek Shukla**' and he pressed the SEND button. My lawyer sent a printout of the same at my jail addresses which was duly censored by jail authorities and delivered to me last week. (Attached Annexure-C colly).

From the contents of the email – it is clear that Allen is continuing to indulge in leakage of secret documents even today. These documents could jeopardize our national security. Allen in the said email is asking Mr. Shukla for his Gmail address to send large attachments which he has referred to in the letter dated 8th March 2013 addressed to MHA and MOD with copies to CBI. (Attached Annexure-D).

3. For the past few months Allen freely distributed secret documents to the media. The attached articles published by the **Indian Express** state that they possess a copy of the secret documents received from Allen however they are not publishing the contents of the same in national interest. (*Annexure-E*).

God only knows how many unauthorized transmissions of secret documents were made by Allen such as the two examples cited above. I/O Mr.Solanki was made aware of these newsitems during my police custody remand at the CBI in September 2012 that Allen is indulging into breach of section 3 of OSA which prohibits '*possession*', '*transmission*' and '*dissemination*' of secret information – the I/O did not take action against Allen neither did he name him as an accused in the chargesheet.

Even till date Allen has not been named as an accused in further investigations being carried out by the CBI u/s 173(8) Cr PC in the above mentioned FIR of Official Secrets Act. Some embarrassing unanswered questions are posted below:

- i. Why such acts of benevolence and kindness were shown towards Allen by the CBI?
- ii. What role was played by Mr. Pulok Chatterjee?
- iii. Why did the I/O Mr.Solanki fraudulently replace GANTON Limited USA with GANTON India Private Limited after the sanction from MHA was received on 29/11/2012 to proceed against GANTON Limited USA?
- iv. Were other officers of the AC-1 branch of the CBI also involved in this fraudulent act of the I/O?
- v. Did Mrs.Meenu Choudhry IPS (SP ACU-III of AC-1 branch) who signed the complaint u/s OSA & filed the same personally in the Hon'ble court of CMM Tis Hazari, Delhi on 30/11/2012 was misled by the I/O or she was under instructions from 'someone important' to save Allen from prosecution?
- vi. Why Allen hasn't yet been booked for '*possession*' and '*transmission*' of secret documents to the media houses and other private persons?
- vii. Why my wife and I were arrested by the CBI in the aforesaid case even though we are innocent. Not even a single piece of so called 'secret documents' was recovered from us.
- viii. Whether immunity from prosecution was provided to Allen by the CBI then under which sections of IPC or Cr.PC as immunity can only be granted to an Approver after the tender of pardon has been received by the Approver from the Hon'ble Court, and Allen is not an Approver of any court in India.
- ix. Why the media/press persons weren't booked for '*possession*' of secret documents? These media persons and journalists weren't even questioned nor their witness statements recorded by the I/O even though my wife and I brought this to the attention of the I/O on several occasions.

Even if the press-persons couldn't be booked for the reasons of '*freedom of speech*', at least the I/O could have put Allen under a restraining order and also seized or examined the computers and email accounts of those press-persons and in national interest deleted the attachments containing OSA documents from the email boxes of those journalists. Nothing of such kind was done. This shows that the I/O Mr.Solanki did not really care

about breach of OSA but he was under instructions to just arrest me and my wife and put us away on false charges of breach of OSA while the real culprit C.Edmonds Allen got away.

- x. Allen cannot be a witness in the above mentioned criminal proceedings since the MHA sanction for prosecution dated 29/11/2012 names GANTON Limited USA as one of the accused and Allen is the 100% shareholder of the said company.

Furthermore, the original FIR of the CBI in this OSA case dated 28th August 2012 the following were named as accused:

- I. Abhishek Verma
- II. Unknown officials of GANTON Ltd
- III. Unknown officials of MoD
- IV. Unknown others

Even though GANTON Limited was included in the FIR as an accused however it was changed to GANTON India Pvt Ltd in the chargesheet in the night of 29th November 2012 just hours before the chargesheet was filed in court the next morning, in order to save Allen from prosecution!

As of now, the only legal status available for Allen is that of an 'accused' and going by his conduct he should have been made an accused on 29/11/2012 had he not been receiving undue favors and protection from the I/O Mr. Solanki and people in high places to extricate Allen from this case.

- xi. During the investigations in the FIR (RC-AC1-2012-A0009) u/s Prevention of Corruption Act, against **Rheinmetal Air Defense** Switzerland; my wife Anca Verma; and me, it was alleged that the Swiss company paid US\$ 530,000 bribe on February 2011 to C.Edmonds Allen in his company GANTON Limited USA (*account with JP Morgan Bank New York*) to get their name out of the blacklisting proceedings of the MoD in India.

IF the version of the AC-1 branch of the CBI is taken on face value then, why Allen who admittedly owns 100% shares of GANTON Limited and is the CEO and President of the GANTON Limited who operates the aforesaid bank account singly, was not made an accused when it has been established that he received US\$ 530,000 from Rheinmetal Switzerland in an account which he operates and he distributed these funds as per his own free will. How can the recipient of the funds (Allen) be spared from prosecution in this case when the CBI?

- xii. Why were my wife Anca and I arrested on the evening of June 8, 2012 merely on the basis of some forged emails provided by Allen to the CBI? I had repeatedly mentioned to the officers of this case before our arrest that these emails were forged and I had filed a criminal case of forgery against Allen and others in regards these emails pertaining to Rheinmetall Air Defense and the criminal suit for forgery, cheating, fabrication and other sections of the IPC was pending before the Hon'ble Court of **Mrs.Surya Malik Grover**, MM Saket Courts since the 2nd of June 2012 (*4 days before registration of the aforesaid FIR by the CBI*). The Hon'ble court took cognizance of the said complaint and was pleased to issue process.

As soon as Allen got to know that a case of forgery and cheating was registered against him in Delhi Courts (*as my lawyer Mr. Vijay Aggarwal announced it at a televised press conference the same evening*), Allen got in touch with Ashok Aggarwal who pressed the right buttons and got PMO cracking and ensured a FIR is registered by the CBI Anti-

Abhishek Verma

Corruption branch and our house was raided on the 7th of June 2012 and my wife and I were arrested the next day.

- xiii. It is well settled law that once a court has taken cognizance of a criminal complaint then another court cannot take cognizance on the same cause of action. However, the officers of AC-1 branch under pressure from Mr.Chatterjee at the PMO misled the Hon'ble Judge of CBI Court **Mr. Talwant Singh** on 9th of June 2012 while seeking our police custody remand and suppressed this fact from the Judge that cognizance had already been taken on the same issue by another court in Delhi.

The truth about my version above can only be ascertained after investigation, and we never objected to investigation and probe – however, we were subjected to judicial custody in one case after the other and CBI I/O's fraudulent manipulation of Government sanctions just to keep us in jail in order to destroy us.

In other high profile cases of the CBI related to defence, such as **TATRA, Agusta Westland VVIP helicopters** case, **Lt.Gen Tejinder Singh** alleged bribe offer to the **Army Chief**, none of the accused were arrested even after FIR registration. However, in our case(s), some officers of the CBI under pressure from the PMO's Mr.Chatterjee continued to arrest us repeatedly last year in one case or the other to keep us confined in jail for as long as possible.

My wife and I are submitting the above facts with great hope that you will have our allegations against Mr.Pulok Chatterjee, Mr.Vincent George, Ashok Aggarwal, C.Edmonds Allen and the I/O Mr.Rajesh Solanki as well as SSP Mr. Ramnish Geer investigated in the spirit of free and fair unbiased investigation and initiate action against the erring officers of the CBI who acted fraudulently in conspiracy with powerful lobbies to ensure that a *professional forger* and *conartist* Claxton Edmonds Allen from New York remains protected since he destroyed us at the instructions of Ashok Aggarwal and Mr.V.George alongwith their friend Mr.Pulok Chatterjee in PMO who wanted to punish us as I had provided evidence against Mr. V. George and Ashok Aggarwal in 1999-2000.

With high regards,

Yours truly,



CHECKED

Abhishek Verma
Jail# 4, Tihar Prisons
New Delhi-110064

Enclosed: Annexures-A to E.

Abhishek Verma

Shri Ranjit Sinha, IPS
Director
Central Bureau of Investigation
CBI Head Quarters, CGO Complex
Lodhi Road, New Delhi

18th June 2013

Respected Sir,

This is to inform you that I am presently lodged in Tihar Jail# 4 in connection with some false and motivated cases against me and my wife **Anca-Maria Verma** which are presently under investigation by the AC-I unit/Branch of the CBI.

You may recall that I had earlier lodged complaints on the 23rd of January 2013; the 3rd of March 2013 and the 14th of May 2013 with your office against Shri Ramnish Geer, SSP of the CBI posted in AC-I unit/Branch who was the IO of some of the cases against me.

Vide the said complaints I had informed the CBI in regards corrupt practices and misconduct of Shri Ramnish. The same officer had conspired with an accused **Ashok Aggarwal, IRS** against whom I am an Approver of the CBI in RC-SIU-8-1999-E-0001 and launched acts of personal vendetta against me and my family due to which I was implicated in false cases of the CBI.

Recently, I have learnt from extremely reliable sources that one Sub Inspector of CBI, AC-I unit **Shri Rajiv Ranjan** has been snooping around the Tihar Jail premises regarding me and my wife, lawyers, family/friends and people who come to meet me and to collect other such information from the visitors/relatives of other inmates of Jail No 4. Shri Ranjan is brazenly snooping around as he is introducing himself as the CBI officer and flashing his identity card in order to coax the visitors to cough up with information about me.

It is known that Sh Rajiv Ranjan, SI/CBI is under Sh Ramnish, SSP/CBI and reports to him directly. This has resulted in my friends and family members feeling unduly threatened for their safety and well being. They now fear of being embroiled in yet another false and malicious case which may be foisted on them by CBI.

I would like to bring to your kind notice that Sh Ramnish/SSP appears to have initiated such a vitiated and malafide spying against me after I sent a complaint against him, as referred above, to the Home Minister of India who duly forwarded it to the MoS for DoPT (vide diary# 1213/MOS(PP) dated 10.05.2013) who in turn referred the matter to CVC for conducting an enquiry against Sh Ramnish.

Subsequently, I had also sent a RTI application last week to AC-I Branch, CBI seeking disclosure of certain information about the financial details pertaining to Sh Ramnish, which could no longer be withheld under the exemption clauses covering the CBI under the RTI Act. Along with this application, I had enclosed the copies of the letters received from DoPT.

Immediately after the AC-I branch received this application, snooping around commenced.

In this regard, it is requested that I may be informed whether Sh Rajiv Ranjan, Sub Inspector has been officially deputed by the CBI for conducting any enquiry about me from Tihar Jail premises, in the last 3 days?

Abhishek Verma

If yes, whether his SSP, Sh. Ramnish has taken his senior formation of the CBI in confidence in writing, as is expected in your organization or he is doing it on his own and has gone rogue?

If yes, whether Sh Rajiv Ranjan is maintaining a record of the enquiry in the form of GD entries and Case Diaries/ supplementary Case Diaries? In case Sh Rajiv Ranjan denies having visited Tihar Jail in the past three days, his mobile tower location will reveal the truth.

As there are four false and motivated cases going on against me, which involve other high ranking bureaucrats and politicians, whether such an operation has been brought to your knowledge before being launched surreptitiously by Sh Ramnish, SSP?

Moreover, as I am in the Judicial Custody as an Undertrial; any such enquiry or probe which has to be conducted regarding my lodging in the Jail, the same must be brought to the knowledge of the concerned Court prior permission of the Ld Court needs to be obtained.

Whether Shri Ramnish and Shri Rajiv Ranjan, SI observed all these procedural formalities/ protocol before initiating the said enquiry, which in fact, is more in the nature of a veiled threat to me and my friends/family members? If not, such acts are highly deplorable.

In case, the actions of Sh Ramnish have been authorized by senior officers, I humbly request you that instead of spying and snooping around Tihar Jail complex, harassing public, scaring my friends and family members, the CBI may observe the proper procedure of obtaining the permission of the concerned Court and interview me as per the Jail Rules. I am ever willing to cooperate with the CBI.

I request that an immediate enquiry into these incidents may be conducted by your office to bring out the truth and in case Sh Ramnish, SSP/AC-I or any of his subordinates are found to be involved in such a criminal misconduct/official impropriety, necessary departmental action may be initiated against them.

I further request that either Sh Ramnish, SSP may be transferred to such a Unit/Branch of the CBI that he is not in a position to influence the officers and subordinates dealing with my cases out of his personal vendetta against me or the investigation of all my cases may be transferred to some other Branch/Unit.

With kind regards,

Yours truly,

-SIGNED-

Abhishek Verma

Central Jail No.4

Tihar Prisons

New Delhi 110064

Enclosed: As above

ANNEX-2

Ed Allen (@CEAllen3) replied to one of your Tweets!

From: **Ed Allen (Twitter)** (n-ze.nouvfurxirezn=tznvy.pbz-7f82d@postmaster.twitter.com) This sender is in your [safe list](#).

Sent: 28 June 2013 03:25AM

To: Abhishek Verma (mr.abhishekverma@gmail.com)



Abhishek Verma,
Your Tweet got a reply!



Abhishek Verma @sheikabhi

14 Jun

Abhishek Verma's letter to Director CBI reg. Ashok Aggarwal & SSP
CBI Ramnish Geer. - Gaurav Chandhok Advocate
scribd.com/doc/147761735/...



Ed Allen
@CEAllen3

@sheikabhi on google alert and I was amused to note how you describe your erstwhile friends like Ramnish and Aggarwal as my associates

03:25 AM - 28 Jun 13



Reply to @CEAllen3



Retweet



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If you believe Ed Allen is engaging in abusive behavior on Twitter, you may [report Ed Allen](#) for spam. Forgot your Twitter password? [Get instructions on how to reset it.](#)

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If you received this message in error and did not sign up for Twitter, click [not my account](#).

Twitter, Inc. 1355 Market St., Suite 900 San Francisco, CA 94103

ANNEX-3

Abhishek Verma, you have a new follower on Twitter!

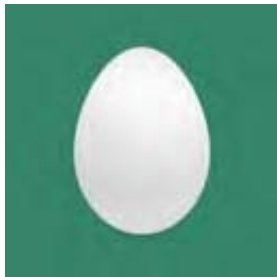
From: **Twitter** (n-ze.nouvfurxirezn=tzvy.pbz-7f82d@postmaster.twitter.com) This sender is in your [safe list](#).

Sent: 28 June 2013 07:51AM

To: Abhishek Verma (mr.abhishekverma@gmail.com)



Abhishek Verma,
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Ramnish @Ramnish1
Following: [26](#) · Followers: [18](#)



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Check out your followers page for more.



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ANNEX-4

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Tweet to Ramnish

@Ramnish1

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- Harini Calamur**@calamur
- The Economist** @TheEconomist
- Shashi Shekhar**@offstumped

Popular accounts · Find friends

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- #LoveForLenskart
- #ModiNumber1
- #SnapdealQuiz
- #ChandiKiBarish
- #BreakFreeWithATIV
- Ishrat Jahan
- CBI
- Jet-Etihad
- Shah Rukh Khan
- Taliban

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Ramnish
@Ramnish1

21 TWEETS 25 FOLLOWING 18 FOLLOWERS

Tweets

- Ramnish**@Ramnish1 11 Jun
@myheartgotbroke why??//
- Ramnish**@Ramnish1 25 Dec
not posted by me
- Ramnish**@Ramnish1 25 Dec
this is spam
- Ramnish**@Ramnish1 10 Dec
We made 138 in 3 hrs Proof here i.imgur.com/uckjA.jpg & got 800 yesterday Go here and drop 10 ASAP cbsnews9.com/?401-70179/mak...
- Ramnish**@Ramnish1 18 Mar 12
Watched "Kahani", excellent movie. In casting at begining.Thanks given to Mamta Banerjee, Honarary CM Ooops... instead of Hounrable CM
- Ramnish**@Ramnish1 13 Feb 12
RT@[htweets](https://twitter.com/htweets):Govt delaying prosecution of ex-CMD of coal PSU - Hindustan Times hindustantimes.com/India-news/New...
- Ramnish**@Ramnish1 12 Feb 12
[@BDUTT](https://twitter.com/BDUTT) Have you read the DNA Story: How to weaken CBI?...
- Ramnish**@Ramnish1 12 Feb 12
DNA special: How to weaken the CBI dnai.in/atco via [@DNA](https://twitter.com/DNA)
- Ramnish**@Ramnish1 14 Jan 12
The Real Truth : Prashant Panday's blog-The Times Of India blogs.timesofindia.indiatimes.com/the-real-truth...
- Ramnish**@Ramnish1 24 Nov 11
New War Cry for Politicians " Anna se nahin.... Thapad se darr lagta hai Sahib"
- Ramnish**@Ramnish1 24 Nov 11
New War cry for politicians: "Anna se nahin... Thapad se darr lagta hai sahib"
- Ramnish**@Ramnish1 24 Nov 11
[@PeopleFusion](https://twitter.com/PeopleFusion) search one for me....
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- Ramnish**@Ramnish1 24 Nov 11
Slapgate.... Politicians angry.... what about public

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- Me 24 Nov 11
-  **Ramnish** @Ramnish1
Sitting late in office for replies to Parliament questions.... But is it working....
[Expand](#)
 -  **Ramnish** @Ramnish1 20 Sep 11
Navy war-room leak: Case falling apart
zeenews.india.com/news/nation/na... via @ZeeNews
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 -  **Ramnish** @Ramnish1 18 Feb 11
Pursing people to put in a bit more effort... speed up things
[Expand](#)
 -  **Ramnish** @Ramnish1 17 Feb 11
Mausam bahut badmash ho gaya hai... daily rang badal raha hai...
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 -  **Ramnish** @Ramnish1 17 Feb 11
Is the stand taken by the PM on collation politics justify the aspirations of the tax payers... Is this expected from Manmohan Singh ji
[Expand](#)
 -  **Ramnish** @Ramnish1 10 Oct 10
[@ALOKMITTAL_IPS](#) I agree. Indians do have some skills in driving but 99% do not have driving behavior. They know rights but not duties
[View conversation](#)
 -  **Ramnish** @Ramnish1 19 Jan 10
[@duttvivek](#) ekele ekele party karte ho or kehte ho enjoy kiya.... ??????????????
Will see you...
[View conversation](#)
 -  **Ramnish** @Ramnish1 19 Jan 10
[@ALOKMITTAL_IPS](#) Sir ji aap kaise hain. Me in Delhi till 22/1/2010. please cal me on 9818935555, I do not have your new number.
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Jet-Etihad

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Ramnish @Ramnish1

21 TWEETS

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18 FOLLOWERS

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Member - Group Executive Council and Group Chief Human Resources Officer, TATA Sons ::::: personal reflections

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virendra aya @varya1234 AN ENGINEERING TEACHER

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Saurabh Tripathi @saurabhps Indian Police Service

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Vivek Wahi @VivekWahi1

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sudhir kumar @sudhirkumar06

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Kailash Pareek CI @KailashPareekCI

Follow



Shail @Shailparihar follow your heart in what u do.

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manish gupta @manksh

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Nisheet Kumar @nisheet_06

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Ravi Kumar @ravikingsh

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Sushil Kumar @sushilf
Professor @ IIM Lucknow



Ashok Kakkar @kakk65
Managing Director - Varian Medical Systems



Sandeep Srivastava @PeopleFusion
Mentor, Consultant, Headhunter & Runner -
all rolled into one solid package !! Follow my
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alok mittal @ALOKMITTAL_IPS



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Ramnish @Ramnish1

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18 FOLLOWERS

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Gimmetricks is the leading technology media providing the information and timely updates about social networking, viruses, mobile technologies and card frauds

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Teacher, Interested in Higher education Reforms, healthcare, Supply Chain.....

Follow



sushil bansal @sushilbansal66

Follow



Shail @Shailparihar
follow your heart in what u do.

Follow



Kailash Pareek CI @KailashPareekCI

Follow



manish gupta @manksh

Follow



Ashok Kakkar @kakkarg65
Managing Director - Varian Medical Systems

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Vivek Wahi @VivekWahi1

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Sandeep Srivastava @PeopleFusion
Mentor, Consultant, Headhunter & Runner - all rolled into one solid package !! Follow my running @runindiarun

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Indian Police Service

Follow



Vivek Dutt @duttvivek
Supdt of Police, Cyber Crime Cell, CBI, New Delhi, India

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virendra arya @varya1234
AN ENGINEERING TEACHER

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Director
Central Bureau of Investigation
CBI Building, CGO Complex
Lodhi Road, New Delhi – 110003

From:

Abhishek Verma
Tihar Jail No. – 4,
Tihar Prisons,
New Delhi – 110064

SP JANAK PURI <110050>
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To,

Minister of State for Personal & Public Grievances
Government of India
Ministry of Personal & Public Grievances
North Block
New Delhi – 110001

From:

Abhishek Verma
Tihar Jail No. – 4,
Tihar Prisons,
New Delhi – 110064

SP JANAK PURI <110058>
ED715018642IN
Counter No:6,DP-Code:MK
To:SUJEET PANDEY,DIG CBI
LODI ROAD, PIN:110003
From:ABHISEKH VERMA , ND
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Shri Sujeet Pandey,
DIG, CBI (AC-1, Branch)
CBI headquarters,
CGO Complex
New Delhi – 110003

From: Abhishek Verma
Tihar Jail No. – 4,
Tihar Prisons,
New Delhi – 110064

SP JANAK PURI <110058>
ED715018112IN
Counter No:6,OP-Code:MK
To:COMMISSIONER,CVC
SARDJINI NAGAR, PIN:110023
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To,

The Commissioner
Central Vigilance Commission
Satarkata Bhavan, A-Block
GPO Complex , INA
New Delhi - 110 023

From:

Abhishek Verma
Tihar Jail No. - 4,
Tihar Prisons,
New Delhi - 110064

SP JANAK PURI <110058>
ED715018109IN
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SARAJINI NAGAR, PIN:110023
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The Secretary
Central Vigilance Commission
Satarkata Bhavan, A-Block
GPO Complex , INA
New Delhi - 110 023

From: Abhishek Verma
Tihar Jail No. - 4,
Tihar Prisons,
New Delhi - 110064

SP JANAK PURI <110058>
ED715018126IN
Counter No:6,OP-Code:MK
To:PRABODH KR,CVC
LODI ROAD, PIN:110003
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Shri Prabodh Kumar,
Joint Director, Anti Corruption
CBI headquarters,
CGO Complex
New Delhi – 110003

From: Abhishek Verma
Tihar Jail No. – 4,
Tihar Prisons,
New Delhi – 110064

SP JANAK PURI <110058>
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Counter No:6, OP-Code:MK
To:UNION HOME MINISTER, GOVT OF INDIA
NEW DELHI, PIN:110001
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To,
Union Home Minister
Government of India
Ministry of Home Affairs
North Block
New Delhi – 110001

From: Abhishek Verma
Tihar Jail No. – 4,
Tihar Prisons,
New Delhi – 110064