

CHARGE SHEET

Police station : Morabi City Dist Rajkot Rural Charge Sheet No. 23/2003 Date : 26/7/03 address and occupation of complainant or informant : Shree Ashivnbhai trikamjibhai Kotak First Information no. M Case no. 22/02 Date : 7/6/02 545 Chairman Morbi Nagarik Sahakari Bank Po. Morbi Dak Sheri.

Ramesh Chandra Shantilal Doshi, Aged 65, residing at Rajkot 202 Golden Star Apartment 2/6 Collage Wadi 1) Amin Sitapati Kumar Varma aged 30 , residing at Ahamedabad 103 Kruan Apartment Dipkunj” society Rajnagar Paladi Ahamedabad – 7. 2) Hiren Nandhubhai Amin aged 32 residing at B/7, Sarvoday Nagar Society 1 Sola Road Gatlo. DiyaAhamdedabad 3) Aprv Labhubhai Sanghvi aged 42, residing at Karija Jonor First floor Krishna Sangi Patu Gan Hit Mumbai – 7, 4) Krin Kantilal Sheth aged 41 residing at Lalit Kutir Gulmahor Cross Road NO. 193 Third Floor Andheri West Mumabi 49. 5) Sanjayh Hariraja Agraval aged 38, residing at 702, Fusu M Apartment Sector NO. 17 Vasi Vadi Mumbai. 6) Subodh Chandarpal Bhandari,

aged 37 residing at 203 Govind Complex Sector 14, Vasi
Navi Mumbai, Crime Register no. 113/03/29/4/03,

- 1) Complainant : Ashivin Trikamji Bhai Kotak chairman Morabi
Nagarik Sahkari Bank Po. Morabi Dak Sheri
- 2) Panch : Jayendarsinh Khodubha Tapkeshvar residing at
Morabi Vajepar Sheri NO. 1,
- 3) Panch : Kasamsha Valisha Fakir residing at : as above
mentioned
- 4) Witness : Kanbhai Keshavlal Thandidi residing at Morbi
Kayaji Plot Sheri No. 8,
- 5) Witness : Chandravadan Chimanlal Pujara residing at Morbi
Anjali Apartment Nagar Plto 6
- 6) Witness : Pradipbhai Hirabhai Vala residing at MORbi
Mahendra Drive Road,
- 7) Raghavjibhai JagarBhai Gadara residing at Morbi Adarsh
Society Shnyhala Road, Chandra Poli
- 8) Wintess : Kishor Shankarlal Bhatt residing at MORbi Shanani
Road, Aradhan Society
- 9) Witness : Alok Shiv Vadan Ray Kasera residing at 8/3/91
Goel Intarsity TB Tower ni Same Ahamedabad Assistant
Manager ICICI Bank JML House Amabavadi Ahamedabad

Syndicate Management Ahamedabad “ account no. LTA/C
523 of which confidential record statement

- 10) Witness : Manager The Gujrat State co. op. bank
Sarkar Bhavan Tilak Road Ahamedabad’s Banking
145/dated 9/5/03 with which submitted record.

As per Crime IPC section 405, 406, 400, 420, 467, 468,
471, 1203, 34, 114 In such a way that the accused persons
mentioned in column no.1 are the managers of Morbi
Nagrik Shakari Bank of Token No.1 and as per RBI Act dated
1974/2001 every cooperative banks are required to invest
10% of their net demand and time solvency in government
securities which To be done through investment according
to which the Board of Directors of the Bank passed
Resolution No. 6 dated 23/10/01 in which it was resolved
to overwrite the account through the signature of any two
of the five officers and resolution dated 25/2/02 during
which the accused named 2 , 3, 4, 5 contacted the
prosecutor and witnesses and informed the government
security, but accused no. 2, 3 and accused no. 4, 5 were
identified and told to do this work by the accused no. 1
against the resolution of the board. By acting contrary to
the resolution, instead of dealing through Dabur, accused

no. 1 of the accused has sent advance bond based on the order of the Hon'ble Gujarat High Court Criminal Case No. 3527/02, dated 9/8/02 dated 17/8/02 hrs. Arrested at 20:30 hrs Jain Par Mukht No. 2 dated 7/5/03 hrs 21:00 hrs No. 3 Arrested dated 29/4/03 hrs 23:50 hrs Court Hawale No. 4 Hon'ble Gujarat High Court Criminal No. 3948/ 03 Obtained anticipatory bail from 3/6/03 Arrested on 6/6/03 at 10:45 a.m. Surety Case No. 5 dated 15/5/03 at 23:00 No. 6 dated 3/6/03 He was arrested at 17:15 and handed over to the court.

Sd/-

Hon'ble Additional Chief JUDCL Magistrate,
Morbi Court, Morbi

Sd/-

Inspector of Police
Morbi CT Morbi
Rajkot Rural

- 11) Sastutharbhai Lalitbhai Mehta Residing at Rajkot 14/
Vivekananda Apartment, Yagnik Road, Rajkot

- 12) 12 Accused Shri J. like this. With statement taken as per order PC 164 of Tusharbhai Lalitbhai Mehta of Vadodaria Hon'ble JUDCL First Class Magistrate Morbi.
- 13) Witness : D D Paradhi PSO Morbi City
- 14) T K A : Kantilal Mohanlal Patel ASI Morabi Sity
- 15) T K A : Shri V D Chudasama P S I Morabi Sity
- 16) T K A : Shri A V Rayjada ASI Morabi Sity
- 17) T K A : Shree K S Shukal PI Morabi Sity
- 18) T K A : Shree M F Jadav PI Morabi Sity

Nos. 2 and 3 have transacted checks of Rs. 12750712/- to the Syndicate Management of accused No. 2, 3 on 26/2/03 and checks of Rs. 167400/- on 4/4/02 without giving any information. Accused no. 6, 7 got together with Hometrade Ltd. No. 6 is the main complainant in Mumbai and they got together and sent this amount to them and sent the bogus PSO receipt to RBI with the wrong name of not giving security for this information. In this way, all the above accused have identified each other and formed a criminal conspiracy, created a false

record and prepared false documents. By making this plan earlier, the money of the Syndicate Bank of Morbi as mentioned above was obtained to buy government securities by manipulation and betrayal and the money was not sent as security. and have assisted each other and have committed the offenses at the time, place and date as under which I present the charge sheet to be acquitted from the evidence.

Date of Offense : Any time before 26/2/02.

Date of Offense : 7/6/02 at 22:15 hrs

Venue : Morbi Citizen Government Bank Morbi

Date : 10/06/2002

My Name Ashwinbhai Trikambhai Kotak, Self : Luhana
Age 45, Occupation : Trade, Residing Danaksheri Bazar
Road, Morbi.

By asking in person I declare that I live with my
Sutumb at the address written above and I have an iron
shop named Kotak Steel Corporation in Arihant Complex
opposite Junavas Stand where I do business. Also serving as
Chairman in Morbi Nagrik Sahakari Bank Saivet Limited for
about last two years and I have filed the said case in Morbi
Court on 7/6/02 which is correct and true in this regard
specifically stating that,

I am the Chairman of the complainant Morbi Nagrik
Sahakhirin Bank Limited. And to register this complaint to
the board of directors of my bank as per standard
resolution dated 7/6/02 under which the said complaint
has been lodged Central Government Bank of India has
sent a circular to all co-operative banks on 19/04/2001 It
has been stated that the Reserve Bank has ordered that
10% of the net demand and time liability should be kept in

government securities and government securities should be invested through SGL account. Pursuant to this order a meeting of the directors of my bank was called in the bank on 23/10/2001 in which resolution No. 6 was passed in the interest of the bank in which resolution it was stated that as per letter dated 10/4/01 from Reserve Bank of India Rs.250000000 /- Resolved unanimously to invest Rs.11000000/- Crore Ten Lakhs in Government Securities by March 2002 in which 10% of the Co-operative Bank having Net Time of Demand Liabilities shall be compulsorily invested in Government Securities and to carry out the necessary formalities in that regard. Therefore, a total of 5 officers of the bank, including the manager, were given full authority to buy and sell government securities with the signature of any two, and in the same resolution, an SGL account was opened in HDFC Bank Rajkot branch of Morbi Nagyar Sahakari Bank for investment of government securities through this account. The resolution to invest and operate the SGL account was passed under the signature of any two of the five office bearers of Morbi Jagrik Sahakari Bank. And regarding this resolution, Morbi Nagrik Bank decided to purchase government securities and started the process but did not purchase any

government securities. Meanwhile, Tusharbhai Mehta who happens to be the son-in-law of the manager of our bank, Ramesh Chandra Shantilal Doshi, told us and the other directors of the bank, Pradeepbhai, Ashokbhai Hathrani. , contacted Upendrabhai Kathrai and told him that he was associated with a company of Government Securities. In this regard, the accused manager has also told us several times through Tusharbhai for work and Tusharbhai and Apoorbhai Sanghvi have also contacted us with the manager earlier.

Then our Bank Directors meeting was held on 25/02/02 in which as per Resolution No. 6 dated 23/10/01 in Government Securities Rs.11000000/-

A resolution was passed in the board meeting dated 25/2/2 that Rs 1 Crore face value 1 Crore should be held in government securities and regarding this it has been decided after discussion with the director SA in the board along with the officer of Dedicate Management Pvt Ltd Ahmedabad. Investing in government securities is mandatory for this bank's investment in FD Rajkot District Co. The main branch of the operative bank is in Morbi, the

bank has authorized the current account of the Rajkot District Cooperative Bank by considering the face value and settlement value of the investment to the authorized officer, to whom a unanimous resolution has been passed to authorize the above mentioned action and in this meeting they were called on the insistence of Tusharbhai and Amit bhai and Apoorbhai Sanghvi were also present with them and they informed the directors of the bank about the government security.

Then, on the second day of this resolution i.e. on 26/2/2 as per the resolution in the meeting, any kind of investigation was done statistically or in coordination with the bank's officer or the chairman of the bank, a check of Rs.1 crore to Syndicate Management Services Pvt Ltd on 27/ sent by courier on 2/2 but Dil Cum Confirmation dated 26/2/2 from Syndicate Management Services Pvt Ltd stating that 9/85% GOI 2015 in security of Rs 50 lakhs and 11/50% GOI 2011 We confirm the investment of Rs. 50 lakhs in the securities of Copies of Dil cum Confirmation Memo of Syndicate Management Services Pvt Ltd. In which the value of one principal is 69,90000/- the value of the other is Rs 64,30000/- then instead of implementing the

resolution one manager issued a check dated 5/3/3 to Syndicate Management Services Private Limited amounting to Rs.189968 for the amount stated in the resolution. 2750722/- sent along with covering letter and courier's address received by the bank.

Thus this manager of our bank has violated the resolution in our directors' meeting and has sent barobars to Syndicate Management Services Pvt Ltd and purchased security on 2/4/20 without taking any consent and the difference amount is Rs.167400/- dated 4/4/ 2 has been sent to the Syndicate Management and access to the Reserve Bank of India has been given to us repeatedly inquiring about this investment. And which did not mention our bank name and told us that the original documents of government securities will take time to arrive and faxed on 13/5/1 saying that your money is safe and will deliver shortly. But not getting any delivery we spoke to the manager and he accordingly requested seven days by fax dated 30/5/2 to Accused No. 2 to 4 of this work so as to save time their intention: said to go so dated 7/6/1 It has been decided to call a meeting of the directors and file a complaint and so we have filed a complaint in the court. I

am still presenting the documentary evidence against the
accused in the above complaint.

So my facts are right and correct as written by me.

Before

Sd/-

Signature

ARREST PANCHNAMA

1. Jayendrasinh Khodubha Parmar/Darbar, Aged : 42, Driving, Residing At : Vajepar – 1, Morbi.
2. Kasmsha Valisha Fakir, Aged 30, Driving, Residing At Vajepar – 1, Morbi

Accordingly we are the five named above and have been summoned and present at the police station of Morbi on today 29/4/3 at 23:20 hrs.

Hence we hereby declare that under IPC section 405, 406, 400, 420, 467, 468, 471, 1203, 34, 114, arrest accused Hiren Chandubhai under crime case number 22/02 at Morbi Police Station and recover mobile from him. And cash has been seized.

A person is present in the police station whose name is being asked his name is Hiren Chandubhai Amin and surname Patel age 32 whose business is to buy and sell government security whose residence is Sarvodaya Nagar

8, Bungalow No. B-7 Sola Road Ghatlodia. Who is wearing a blue color half-length shirt and black jeans pants, in the left pocket of the shirt there is a mobile phone which is a Samsung company model number 210 which has a Hutch company post paid SIM card number 98250 74185 which states that the SIM card is in his name. The mobile which is in working condition in which the message number is 749 1222 dated 26/4/3 and the rest of the new calls are dated 29/4/3 in which there are 6 miss calls from Rupeshkumar and 022 2841550 and 98250 94728 and 98255 11226. The price of the Bobile is around Rs 4500/-. which has been seized from him for tapas in the face of the Amo Panchos. And cash was found in his pant pocket. 1000/- rupees note no. 2, 500/- rupees note no. 18, total amount of rupees 11000/- has been found. Which has been seized with the signatures of the commissions for investigation. Apart from this, nothing else was found from him and no injuries were visible on his body. This Panchnama has been executed correctly by us and who has been arrested at 23/50 hrs.

Sd/-

Sd/-

Before

Sd/-

Inspector of Police

Morbi city

Record of taking statement of Tushar Lalitbhai Mehta on
9/7/3 as per IPC Section No. 406, 420 of Morbi Police
Station Case No. 22/02

But as per our earlier fixed program to go to Gandhinagar
on 8/7/3 so we have informed by telegram for permission
to be present on 9/7/3 and accordingly we are present
today before your sir giving our statement above. is Also,
we will be present when we are called in this regard

So my facts are correct and correct as written by me.

Before

Sd/-

Inspector of Police

Morbi city

Date : 10/6/2002

My Name Kanubhai Keshavlal Pandit Luhana, Age 51,
Occupation : Trade, Resident : Kanyaji Plot, Street No. 8,
Morbi.

Declare in person that I am residing at the above
address and dealing in mosaic tiles and serving as a director
in Morbi Nagrik Bank.

Today you have to listen to me by reading the
complaint filed by the chairman of our bank Ashwin Bhai in
the court of Honorable Morbi in which I give a statement
that the facts stated in the complaint are true. The
manager in this case is Ramesh Chandra Shantilal Doshi. On
23/10/01 there was a meeting of the director of Morbi
Citizen Bank I was also present in it. In that meeting, it was
unanimously decided that as per the rules of the bank, S. G.
L. To purchase government securities through account and
to open an account in the name of Morbi Nagrik Bank at
HDFC Bank Limited Rajkot branch and to deal in
government securities through that account. And resolved

to deal with the signature of any two of the five officers of the bank to purchase that security.

Then we see Tusharbhai who happens to be the son-in-law of our bank manager. He was accompanied by Amit Verma Hiren Amin, director of his Syndicate Management Services Pvt Ltd, Apoorbhai Sanghvi, originally from Morbi. And on that day i.e. on 25/2/2, Tusharbhai said that these people are my relatives and Amit Verma had given the information about the government security in our board meeting but we have not entered into an agreement with them to buy the government security despite the resolution of the Board of D Sector. Going against his will, our bank manager conspired with Amit Verma, Hiren Amin, Apoorva Sanghvi etc. with the bad intention of causing financial loss to the bank. The director made an agreement on 27/2/2 to withhold the money of our bank through SGA account, one crore rupees. No.'s cheque, check for Rs.2750722/22 dated 5/3/2 and Rs.167400/- dated 4/4/2; old checks sent to Syndicate Management Services Pvt Ltd without informing us and against the bank's resolution and After that, when the government security documents were not received by the bank, our chairman asked the manager

and did not give a satisfactory answer and it is in my opinion that the wrong receipt of the Reserve Bank was shown, thus the manager of the bank misused his position and caused financial loss to the bank.

So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city

ARREST PANCHNAMA

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Morbi city

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unanimously decided that as per the rules of the bank, S. G.
L. To purchase government securities through account and
to open an account in the name of Morbi Nagrik Bank at
HDFC Bank Limited Rajkot branch and to deal in
government securities through that account. And resolved
to deal with the signature of any two of the five officers of
the bank to purchase that security.

Then we see Tusharbhai who happens to be the son-in-law of our bank manager. He was accompanied by Amit Verma Hiren Amin, director of his Syndicate Management Services Pvt Ltd, Apoorbhai Sanghvi, originally from Morbi. And on that day i.e. on 25/2/2, Tusharbhai said that these people are my relatives and Amit Verma had given the information about the government security in our board meeting but we have not entered into an agreement with them to buy the government security despite the resolution of the Board of D Sector. Going against his will, our bank manager conspired with Amit Verma, Hiren Amin, Apoorva Sanghvi etc. with the bad intention of causing financial loss to the bank. The director made an agreement on 27/2/2 to withhold the money of our bank through SGA account, one crore rupees. No.'s cheque, check for Rs.2750722/22 dated 5/3/2 and Rs.167400/- dated 4/4/2; old checks sent to Syndicate Management Services Pvt Ltd without informing us and against the bank's resolution and After that, when the government security documents were not received by the bank, our chairman asked the manager and did not give a satisfactory answer and it is in my opinion that the wrong receipt of the Reserve Bank was

shown, thus the manager of the bank misused his position and caused financial loss to the bank.

So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city

Date : 10/6/2002

My name is Chandravadan Chimanlal Pujara, Luwana,
Age 38, Occupation : Trade, Resident Anjali Apartment,
Nagar Plot, Morbi

By asking in person I am writing that I am living with
my family at the above mentioned address and I am
working as a cotton paddy broker and land broker and I
was a director in Morbi Nagrik Sahakari Bank and I have
resigned as a director with effect from 6/2.

Today you have to listen to me by reading the
complaint filed by the chairman of our bank Ashwin Bhai in
the court of Honorable Morbi in which I give a statement
that the facts stated in the complaint are true. The
manager in this case is Ramesh Chandra Shantilal Doshi. On
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So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city

Dated 10/6/2002

My name is Ashokbhai Laljibhai Hathrani, Luwana Age 41, Occupation: Trade, Resident: Virpar, Taluka Tankara,

I declare in person that I live with my family at the above mentioned address and I own Raghukul Cotton Mill in which I deal in cotton and support my family. And I am a director in Morbi Nagrik Bank.

Today you have to listen to me by reading the complaint filed by the chairman of our bank Ashwin Bhai in the court of Honorable Morbi in which I give a statement that the facts stated in the complaint are true. The manager in this case is Ramesh Chandra Shantilal Doshi. On 23/10/01 there was a meeting of the director of Morbi Citizen Bank I was also present in it. In that meeting, it was unanimously decided that as per the rules of the bank, S. G. L. To purchase government securities through account and to open an account in the name of Morbi Nagrik Bank at HDFC Bank Limited Rajkot branch and to deal in government securities through that account. And resolved

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So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city

Date: 17/07/2002

My name is Pradipbhai Hirabhai Bala, Age 46, Occupation: Advocate, Resident : Morbi Mahendra Drive Road, Phone No. : 0-21869 R : 24869.

I declare in person that I live with my family at the above mentioned address and I own Raghukul Cotton Mill in which I deal in cotton and support my family. And I am a director in Morbi Nagrik Bank. In which I and 2 Ashvinhai 3), Upendrabhai B Kathrana 4) Ashokbhai L. Kathrani 5) Raghavji Bhai J Gandara 6) Chandravadan Bhai C. Pujara 7) Kanaiyalal K. Pandit. 8) Jagadishbhai D. Ashwinbhai T among the total eight directors of Set M. Kotak is the chairman of our bank.

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shown, thus the manager of the bank misused his position
and caused financial loss to the bank.

So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city

Date : 18/7/2002

My Name Raghavjibhai Jivrajbhai Gadaya, Age 48,
Occupation : Trade, Resident : Morbi, Chandramola Adarsh
Society Shanala Road, Morbi.

Declare in person that I am residing at the above
address and I am doing the business of Diamond Industry
and serving as a director in Morbi Nagrik Bank for the past
2 years. There are 8 directors in our bank out of them I and
2 Ashvinhai 3), Upendrabhai B Kathrana 4) Ashokbhai L.
Kathrani 5) Raghavji Bhai J Gandara 6) Chandravadan Bhai
C. Pujara 7) Kanaiyalal K. Pandit. 8) Jagadishbhai D.
Ashwinbhai T among the total eight directors of Set M.
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Today you have to listen to me by reading the
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unanimously decided that as per the rules of the bank, S. G.
L. To purchase government securities through account and

to open an account in the name of Morbi Nagrik Bank at HDFC Bank Limited Rajkot branch and to deal in government securities through that account. And resolved to deal with the signature of any two of the five officers of the bank to purchase that security.

Then we see Tusharbhai who happens to be the son-in-law of our bank manager. He was accompanied by Amit Verma Hiren Amin, director of his Syndicate Management Services Pvt Ltd, Apoorbhai Sanghvi, originally from Morbi. And on that day i.e. on 25/2/2, Tusharbhai said that these people are my relatives and Amit Verma had given the information about the government security in our board meeting but we have not entered into an agreement with them to buy the government security despite the resolution of the Board of D Sector. Going against his will, our bank manager conspired with Amit Verma, Hiren Amin, Apoorva Sanghvi etc. with the bad intention of causing financial loss to the bank. The director made an agreement on 27/2/2 to withhold the money of our bank through SGA account, one crore rupees. No.'s cheque, check for Rs.2750722/22 dated 5/3/2 and Rs.167400/- dated 4/4/2; old checks sent to Syndicate Management Services Pvt Ltd without informing

us and against the bank's resolution and After that, when the government security documents were not received by the bank, our chairman asked the manager and did not give a satisfactory answer and it is in my opinion that the wrong receipt of the Reserve Bank was shown, thus the manager of the bank misused his position and caused financial loss to the bank.

So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city.

Date : 18/7/2002

My Name Kishor Shankarlal Bhatt,, Age 46,
Occupation : Service, Resident : Aradhana Society Shanala
Road, Morbi, Telephone No. : R 32035 Office : 22118

Declare in person that I am residing at the above address and I am doing the business of Loan Officer in the bank of Nagrik Sahakri Benk Llimitd, Morbi for the past 27 years as our bank manager there was Rameshchandra Shantilal Doshi from dated 17/8/99 to dated 10/6/2002 as the directors in our bank 1) Ashvinhai T. Kotak 2) Upendrabhai B Kathrana 3) Ashokbhai L. Kathrani 4) Raghavji Bhai J Gandara 5) Chandravadan Bhai C. Pujara 6) Kanaiyalal K. Pandit. 7) Jagadishbhai D. Ashwinbhai 8) Pradeepbhai H. Wala, among the total eight directors of Set is the chairman of our bank. In which Ashwinbhai T as the chairman of the bank. Kotak is that any resolution passed in the meeting of the board of directors of our bank is recorded in the note book.

The central government's Reserve Bank of India has sent a circular to all cooperative banks on 19/4/2001 stating that 10% of net demand and time liabilities should be invested in government securities through SGL account. Pursuant to this Reserve Bank's circular, a meeting of the Board of Directors of Morbi Nagrik Sahakari Bank was convened in the Bank on 23/10/2001 in which Resolution

No. 6 was passed in the interest of Morbi Nagrik Bank. It is stated in the resolution that as per Syndicate Bank of India's letter dated 19/4/2001, in case of net time of demand liabilities of less than Rs 25 crores, the Co-operative Bank shall be required to invest 10% in Government Securities by March 2012. It has been unanimously decided to invest Rs. 11 crores and 10 lakhs and to carry out the necessary procedures and procedures, a total of eight officers of the bank, including the manager, have been given full authority to buy or sell government securities under the signature of any two of them, and in the same resolution for the investment of government securities. Kheshji L Account opened in HDFC Bank Rajkot Branch of Morai Nagrik Cooperative Bank was resolved to invest in government securities through this account and SGL Account was resolved to operate under the signature of any two of the officers of Morbi Nagrik Cooperative Bank.

Morbi Nagrik Bank has thus decided to open an SGA account in HDFC Bank Rajkot for Government Securities on 28/1.

Statement of Kishore Shankarlal Bhatt

Date: 18/7/2002

Amit Verma, Director of his so-called Syndicate Management Services Private Limited, Hiren and Apoorbhai Sanghvi originally from Morbi were present and on that day i.e. 25/2/2 Tusharbhai told the Board of Directors that these people are my relatives and Amit Verma recommended the Government Security. Although the directors of the bank have not agreed with them to buy government securities given in the meeting of the bank, the managers of our bank, Amit Verma Hiren Amit and Apoorva Sanghvi etc. have arbitrarily conspired against the resolution of the board of directors to make our bank loss and misappropriate the money of our bank. In order to do so, the SGA account has been misappropriated through malicious intent. A check amounting to Rs.1 crore and a check dated 4/4/2002 for Rs.167400/- were sent to

Syndicate Management Services Private Limited without informing the Board of Directors in the bank and against the resolution of the bank. After that, the documents of the government securities were not received by the bank, when our chairman asked the manager, no one gave a satisfactory answer and false receipts of the Reserve Bank were presented, so the manager of the bank, Rameshchandra Shantilal Doshi, misused his position and caused financial loss to the bank. Ashvinbhai T., the chairman of our bank complained. I hereby submit the certified copy of the letter dated 28/12/2001 opening SGA account in HDFC of our bank.

So my facts are right and correct as written by me.

Sd/-

ASI

Morbi city.

Date : 29/04/2003

My Name Rakesh Kumar Nalinbhai Amin Age 32
Occupation : Color Chemical Resident Ahmedabad Nildeep
Tower Naranpura

Declare in person that I live with my family at the
address shown above and trade in color chemicals.

Today you sir asked me about Hiren Amin and in reply I told him that he is my uncle's son. And Marathi is small This Hiren has been complained in police station and police of morbi has registered a case against him and applied for it in high court our lawyer told hiren bhai to stay at abu ambaji so abu ambaji is gone and also my uncle nandubhai in ongc mumbai was doing service and his flat was completed for 6 months so he went to Mumbai to hand over the flat. So that neither Hiren bhai nor my uncle Nehulbhai is present in the High Court now so I am here at my uncle's house for two or three days asking me to stay here. Hiren bhai's mobile number is 982502 74185 this is Hirenbhai's advocate Miteshbhai Amin. Hirenbhai's house is his wife

Kaminiben and his age but no one else is present in the house my name is Rayar Rakesh Kumar I am not Hiren.

That is my fact.

before

Sd/-

Police Inspector

Morbi city

Date : 9/5/003

My Name Alok Shivdanrai Kacher, Age : 30,
Occupation : Service, Resident 6-3-91, Goyal Inter City TV
Towerni Chali, Ahmedabad

I declare in person that I am residing with my family at the address shown above and working as Assistant Manager in ICICI Bank at JMC House Ambawadi, Ahmedabad for the last three years.

Today Syndicate Management Private Limited Anish and K. P. Inquiring about the transaction regarding the account of Chali No. 002405000523 of CG Road, Hulabhai Tekra Ahmedabad with the hostel, I am stating that as per our records, Amit S. Verma and Hiren N. as directors of Mandate Management Avishian Private Limited Ahmedabad. Amin, I am stating from above the statement of his above account that on 4/3/2002 rupees 1 crore has been deposited in his account which was sent for clearing the check money and on 6/3/2002 rupees 2710722/- from the clearing of the check money. Deposited in the account and also credited on 11/4/002 in clearing coming from check Rs.167400/-. Also check number 174470, Rs 12111166/67 has been withdrawn from his account on 8/3/2002 which is a check of Co-Operative Bank cleared from the receiving bank. But at present our record surcharge is not available here in the godown which we will send to you through courier and we will produce the original check in the court if required and the above matter of mandate management Avisashian Pvt Ltd Madavad dated 1/3/02 to 30/4/ I present the statement of loan deposited upto 02 and also present the certificate of the check given to the above Co-operative Bank. In this regard,

the above money was sent to Syndicate Management Ashwinu Private Limited Ahmedabad to purchase government security from Morbi Nagrik Co-operative Bank. Directors of A Syndicate Management Private Limited Ahmedabad Amit S. Verma and Hiren N Amin have been complained against. Which I have learned by your application to Sir.

That is my fact

Sd/-

ASI

Morbi city

Camp: Ahmadabad

The Gujarat State Cooperative Bank Ltd.

Post Box No. 302, Sahakar Bhavan, Tilak Road,
Ahmedabd – 380001

Our Ref. : Banking / 45

Date:9/5/2003

To,
Morbi City Police
Morbi

Respected Sir,

Subject : Regarding providing copies of check numbers 189961, 189968, 561351 of Morbi Nagrik Sahakari Bank.

Sincerely your letter dated 9/5/2003 No. 2003 has been received in person. To purchase government

securities of Morbi Citizen, check No. 189961 dated 27/2/2002 Rs. 1 Crore to Syndicate Management Services Limited Ahmedabad and Check No. 189968 dated 5/3/002 Rs. 2750722/- and Check No. 561351 dated 4/4002 Rs. 167400/- /- sent here for collection and the cost of which has been deposited in this bank. Attested xerox copies of these three checks along with extract of current accounts are enclosed herewith. Original checks are on record of this bank and will be produced if necessary. Which you are requested to note.

Enclosure :- As above

Yours faithfully,

Sd/-

Ghee Gujarat State Co Operative Bank Limited

Manager

Date : 9/7/2003

My Name Tusharbhai Lalitbhai Mehta, Age 37, Occupation: Trade, Resident: Rajkot E/J Vivekananda Apartment, Yagnik Road, Phone No: R-2467625 Office: 2239109, Native Vankaner Dewanthara Main Road,

I declare in person that I live with my family at the above mentioned address and doing business as Bessie Share Valuer for last 10 years with office at 226 Sadguru Arcade, Dhebar Road, Rajkot and we are two brothers. In which I am big. I have a younger Kalpendra who lives with our father in Wankaner and does computer contracting business for a bank. I studied up to class 11/12 in Wankaner Primary School and did class 11 12 in Swastik Shishu Vihar Ahmedabad and then B.Com in HA College of Commerce Ahmedabad. Studied this in 1985 when I completed BCom then worked to learn work of share valuer in Mumbai Kantibhai Vakharia Harijan Chamber Nariman Point After practicing for three years in year 1991/9211 opposite Somnath Complex Hotel in Rajkot, had office in Karanyar and in Rajkot Stock Exchange. I have started working as a share vendor. I got married eight years ago to Heena,

daughter of Rajkot resident Rameshchandra Shantilal Doshi. And one child is a son named Palay. My father-in-law is an industrial co. Served as Bank Manager in Operative Bank Surat and after retiring from it was employed in Rajkot branch of Veraval Mercantile Cooperative Bank and after resigning from it he was lastly joined as Manager in Morbi Nagrik Sahakari Bank.

I know Apoorbhai Labhubhai Sanghvi, a native of Morbi and living in Mumbai, he works in Mumbai as a share broker and banking finance, I have known him for over ten years. He worked for Citizens Cooperative Bank Rajkot and is a member of Rajkot Stock Exchange and has an office in Rajkot Stock Exchange. In the year of November 2001, Apurva Labhubhai Sanghvi came to Rajkot Citizens Cooperative Bank of Mumbai and his sateh Ketan Kantilal Seth Rajkot and after finishing his work I went outside the bank to call Apurva Sanghvi and introduced Ketan Seth and then next morning me and Ketan Kantilal Sheth and Apoorva Labhubhai Sanghvi came to Morbi from Rajkot and all three of us went to Apoorva Sanghvi's uncle's house and from there came to Morbi Citizen Cooperative Bank and met my father-in-law Rameshbhai Doshi as a manager in the bank

and also met Chairman Ashwin Bhai Kotak and two three directors in the bank and Citizen Discussions were held regarding the investment of the bank money and Apoorva Sanghvi and Ketan Seth discussed the investment and these people i.e. Apoorva Sanghvi and Ketan Sheth said that we do not do small work in the morning. But our second party in Ahmedabad is in the acquaintance, I told them that I will tell them to contact you. After that we got divorced and in October 2001, working in Ahmedabad to buy and sell Syndicate Management Services Private Limited Government Securities, he came to me and told me that Ketan Seth had talked to me about buying Government Securities of Morbi Nagrik Sahakari Bank, so I went there. Having spoken to you and Ketanbhai Seth has introduced you, I have come to you. After this, Amit Verma was spoken to on the telephone and Hiren N., Director of Sateh Syndicate Management Services Private Limited Ahmedabad in Amit Warma. Amin Seth was also identified

Before

Sd/-

Inspector of Police

Morbi city.

Page No. 2

Statement of Tushar Lalitbhai Mehta dated 9/7/03 under Morbi Police Station Case No. 22/02 IPC Section No. 406, 420

After this, according to the discussion on the phone, a meeting of the board of directors of Morbi Nagrik Shakari Bank was held on 25/2/002, in which I came from Rajkot to Morbi, in this meeting of the board of directors, the directors of Syndicate Management Services Private Limited, Ahmedabad, Amit S. Verma and Hiren N. Amin and Board of Directors and Manager Rameshbhai Doshi etc. were all present. In which we were sitting behind. Hiren N. in this meeting. With Amin and Amit S Verma, given the information to buy and sell government securities and then I came to know in the month that Morbi Nagrik Sahakari

Bank has sent Rs 12750722/- and Rs 167400/- to Syndicate Management Services Pvt Ltd Ahmedabad for buying government securities which is not providing security. So that Apoorva Sanghvi, who you have identified, has informed that he has sent the securities to whom he has introduced. Informed about giving security money from Curry Syndicate Management Services Pvt Ltd Ahmedabad but even then security is not received so we informed Apoorva Sanghvi about this matter by directors often he said that I am talking to Ketanbhai and he will talk to Ketanbhai Syndicate like this Yet the false promises were given by them but no security or money was given and finally sent to the receipt bank with matching name of Reserve Bank of India. It was learned from the directors that after this the above money of Morbi Nagrik Sahakari Bank was not received and the securities were not received and it was lost. Chairman of Morbi Nagrik Sahakari Bank Ashwinbhai Kotke in Morbi Court Ramesh Chandra Doshi Amit Varam Hirenbhai Amin Director Syndicate Management Services Pvt Ltd Ahmedabad and Learned filed against Apoorva Sanghvi, resident of Mumbai. After this I came to know that Syndicate Management Services Pvt. Ltd. Ahmedabad, money for purchase of government

securities of Morbi Citizen Co-operative Bank Rs. 12750722/- and Rs. 167400/- they transacted money to Hometrade Ltd. Mumbai sateh and sent money to them thus the main administrator of Home Trade in committing this crime. Sanjay Agarwal and Subodh Bhandari, who signed this contract on behalf of Hometrade, are also involved, so the above-mentioned accused have helped each other and conspired to cheat and embezzle the money of Morbi Nagyar Sahakari Bank in the name of buying government securities. During the investigation in this crime, the police 1) Rameshchandra Shantilal Doshi 2) Hiren N Amin 3) Amit S. Verma 4) Ketan Kantilal Seth 5) Sanjay Aggarwal 6) Subodh Bhandari 7) Apoorva Sanghvi is known to be arrested.

We have not received any commission from Syndicate Management Services Pvt Ltd Ahmedabad Hometrade Ltd Mumbai regarding purchase of the above Government Securities nor have we received any commission from anyone in this regard nor am I in the business of buying and selling Government Securities. We have appeared in Morbi city on 8/7/03 at 10:30 a.m. from summons at Rajkot to write statement.

Before

Sd/-

Inspector of Police

Morbi city