

FIRST INFORMATION REPORT

(Under Section 154 Cr. P.C.)

1. District: Greater Mumbai City **P.S.:** Matunga**F.I.R. No.:** 0473**Year:** 2023**Date & Time of FIR:** 07/11/2023 09:29 Hrs.**2. Sr. No. Acts Sections**

Sr. No.	Acts	Sections
1	Indian Penal Code 1860	420
2	Indian Penal Code 1860	465
3	Indian Penal Code 1860	467
4	Indian Penal Code 1860	468
5	Indian Penal Code 1860	471
6	Indian Penal Code 1860	120-B
7	Maharashtra Prevention of Gambling Act, 1887	12(a)
8	Information Technology Act, 2000	66(d)
9	Information Technology Act, 2000	66(f)

3. (a) Occurrence of Offence:**Day –** Between the days**Date from:** 01/01/2019**Date to:** 06/11/2023**Time Period:****Time from:** 00:00 Hrs.**Time to:** 00:00 Hrs.**(b) Information received at P.S.:****Date:** 07/11/2023**Time:** 04:00 Hrs.**(c) General Diary Reference:****Entry No.:** 007**Date & Time:** 07/11/2023 05:09 Hrs.**4. Type of Information:** Written

5. Place of Occurrence:**(a) Direction and Distance from P.S.:** South, 2 km.

Beat No.:

(b) Address: Room No. 7, Plot No. 362-B, Mohanlal Mansion, Dr. Babasaheb Ambedkar Road, Matunga (E), Mumbai – 19.**(c) In case, outside the limit of this Police Station, then****Name of P.S.:** Matunga**District (State):** Greater Mumbai City (Maharashtra)**6. Complainant / Informant:****(a) Name** : Prakash Ghanshyam Bankar**(b) Father's Name** :**(c) Date/Year of Birth** : 1986**(d) Nationality** : Indian**(e) UID No.** :**(f) Passport No.** : -**Date of Issue** : -**Place of Issue** : -**(g) Id details (Ration Card, Voter ID Card, Passport, UID No., Driving License, PAN):**

S.No.	Id Type	Id Number
1		

(h) Address:

S.No.	Address Type	Address
1	Present Address	7/362-B, Dr. Babasaheb Ambedkar Road, Mohanlal Mansion, Matunga (E), Mumbai-400019, Matunga, Greater Mumbai City, Maharashtra, India.

2	Permanent Address	7/362-B, Dr. Babasaheb Ambedkar Road, Mohanlal Mansion, Matunga (E), Mumbai-400019, Matunga, Greater Mumbai City, Maharashtra, India.
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(i) **Occupation** :

(j) **Phone Number** :

Mobile No.: 91-9702544717

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

S. No.	Name	Alias	Relative's Name	Present Address
1	Rohitkumar Murgai			1. Punjab, Patiyala, Punjab, India.
2	Amit Sharma			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
3	Kumar			1. Dubai, Abudhabi-Dubai.
4	Shubham Soni			1. Bhilai, Chattisgarh, Durg, Chattisgarh, India.
5	Atul Agrawal			1. Chattisgarh, Durg, Chattisgarh, India.
6	Vikas Swa Pawan Chaparia			1. West Bengal, Kolkata, North Region, West Bengal, India.
7	Amit Bombay			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.

S. No.	Name	Alias	Relative's Name	Present Address
8	Lala			1. Dubai, United Arab Emirates (UAE).
9	Abhishek			1. Chattisgarh, Durg, Chattisgarh, India.
10	Khanjam Jagdish Kumar Thakkar			1. Girgaum, Mumbai, V. P. Road, Greater Mumbai City, Maharashtra, India.
11	Amit Jindal			1. Delhi, North Delhi, Delhi, India.
12	Chandrabhushan Verma			1. Raipur, Chattisgarh, Durg, Chattisgarh, India.
13	Amit Majethia			1. Gandhidham Kutch, Ahmedabad City, Gujarat, India.
14	Dinesh Khambat			1. London, England.
15	Chander Agrawal			1. Dubai, Abudhabi-Dubai.
16	Mohit Burman			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
17	Hemant Sud			1. Dubai, Abudhabi-Dubai.
18	Gaurav Burman			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
19	Hareshbhai Kalabhai Chaudhary			1. Gujarat, Ahmedabad

S. No.	Name	Alias	Relative's Name	Present Address
				City, Gujarat, India.
20	Bharat Chaudhary			1. Dubai, Abudhabi-Dubai.
21	Saurabh Rameshwar Chandrakar			1. Chattisgarh, Durg, Chattisgarh, India.
22	Ravi Jagdishchandra Uppal			1. Chattisgarh, Durg, Chattisgarh, India.
23	Aman			1. Dubai, Abudhabi-Dubai.
24	Ranvir Roy			1. Khar, Mumbai, Khar, Greater Mumbai City, Maharashtra, India.
25	Hitesh Khushlani			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
26	Sahil Khan			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
27	Sam Khan			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.
28	Bedi			1. Dubai, Abudhabi-Dubai.
29	Rajiv Bhatia			1. Punjab, Amrutsar City, Punjab, India.
30	Wasim Qureshi			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.

S. No.	Name	Alias	Relative's Name	Present Address
31	Krish Laxmikant			1. Dubai, Abudhabi-Dubai.
32	Other unknown persons			1. Mumbai, Matunga, Greater Mumbai City, Maharashtra, India.

8. Reasons for delay in reporting by the complainant / informant:

9. Particulars of properties of interest:

S. No.	Property Category	Property Type	Description	Value (in Rs/-)
1	Coins and Currency	Indian – Rupee	Property worth Rs. 15000 Crores.	1,50,00,00,00,000.00

10. Total value of property (in Rs/-): 1,50,00,00,00,000.00

11. Inquest Report/U.D. Case No., if any:

S. No.	UIDB Number

12. First Information Contents:

MACR No. 473/2023

Statement

Date: 07/11/2023

My Name - Shri. Prakash Ghanshyam Bankar, Aged 37 years, Occupation – Social Worker, Address: Mohanlal Mansion, Room No. 7, Ground Floor, Plot No. 362-B, Dr. Babasaheb Ambedkar Road, Matunga (E), Mumbai – 400019.
Mobile No. 9702544717

I work as a Social Worker in the city of Mumbai and also involved in Philanthropy and Public Charity work. I have reasonable knowledge of operating electronic devices like Computer, Mobile Phone etc. and doing online transactions. My Bank account is with Bank of Baroda, Matunga Branch, Mumbai. I say that, through various Social Networking sites like Facebook, Instagram, Google Ads, I came to know about www.khiladi.com (Khiladi Book) a famous Website/Web Portal of the village. The said Website/Web Portal is designed for online betting/gambling on Cricket, Football, Tennis, Casino, Tin Patti (Three Card game) and various other sports advertised by Rohit Kumar Murgai and others, which is not containing any intelligence factor. Among the icons on the above the said Website/Web Portal there is an icon that says “Get ID Now”, which takes Web Portal visitors to various games, casino games (more than 3000), live games, quick games, poker, cyber sport, fantasy. After completing the said online registration process, the Website/Web Portal offers various options to the visitors to choose the form of online betting. I say that, Khiladi Book Portal claims to be the world’s largest online betting exchange, the Web Portal includes 10,000\$ sports events and 100\$ casino options. The operators of this Web Portal always show the members of the public that celebrities like Shahid Kapoor trusts it and they offer (1300 percent welcome bonus) on most games to the individuals who play games on this Web Portal. This Web Portal is the fastest connecting bet providing live online gaming experience. The operators of this Web Portal further represent that to support a smooth and secure online experience, they use the most secure payment methods, 24 x 7 customer support and offer deposits and withdrawals only through www.khiladi.com. Surprisingly, this said KHLADI BOOK Website is operated by the Never Ending Gaming N V, with the dishonest intention of avoiding compliance with Indian law. A company incorporated under the laws of CURACAO, with company registration number 154043, with address at Abraham de Veerstraat 9, Curaçao. I say that, Accused No. 1 namely Rohit Kumar Murgai is considered

as one of the Top 5 Match Fixers (Cricket) in India. He is investing the money he got from betting/gambling in Crypto currency and parking it there. I say that, Khiladi Book is not an independent/stand alone entity which provides online betting services through the said Web Portal. There are many other organizations, which are working on the same lines and most of them are interconnected through common partners and form a part of a larger nexus. Some of these inter connected portals include 11xplay, 99exch, Betbhai, BJ88, CBTF, Coexch99, Cricbet99, Fairbook247, Fairexchange, Fairplay, Laserbook 247, Lotus365, WinBuzz, ReddyAnna, SportsX9 etc. They are attached at Exhibit A to the complaint filed by me. Some of them are the major owners of the above mentioned interconnected platforms and their names are as follows - Aman, Ranveer Roy aka Vikram Singh Gandhi aka vsg, Amit Majithia, Hitesh Khushlani, Krish, Sahil Khan, Sam Khan, Bedi, Kaka Amritsar, Rohit Murgai, Dinesh Khambat, Vikas Chaparia alias Chiku, Chander Aggarwal and their associates/helpers etc. I say that, after enquiry, it came to my knowledge that there are many Websites/Web Portals providing online betting and gambling services, all these Web Sites/Portals are connected/controlled/operated/managed in a complex and systematic way. The said Khiladi Book along with several other subsidiary companies/sub-divisions which operate under different names and have different online Websites/portals, each of them, though different in appearance, are indirectly owned and controlled by the said Nexus. The said Nexus has more than 100 such subsidiaries with different names.

I say that each of these subsidiaries/divisions though independent of each other, are being controlled by the same persons belonging to the same relationship. The Modus Operandi, by which the Accused and their unknown accomplices have been able to mobilize and consolidate such a vast network of auxiliaries/subordinates, is as follows:-

a) Firstly, the Accused persons locate and identify other players/persons involved in activities like illegal betting, gambling, tipping etc. These individuals also run their own Websites/portals to run their gambling/betting business.

b) Secondly, Accused persons approach these individual players and offer to partner with them. This is done with a dual purpose. Firstly to eliminate any other competition in the business and secondly to ensure that all consumers who wish to engage in gambling, betting are drawn towards the same relationship to maximize market share.

c) Thirdly, Accused persons enter into partnership with these individuals, open a subsidiary/division which has its own Website/Portal and has a profit sharing arrangement. I say that, though these newly discovered elements include the Accused persons and other individual persons, all of them are managed and operated through a single Nexus, in such a way that the Accused have entered into a well-planned criminal conspiracy to create a system, through which Websites/Portals providing gambling and betting services, there are more than 100 subsidiaries/divisions, all operating under one umbrella. To understand the reason behind diversifying its services into several subsidiary subdivisions, it is important to note that this is done to avoid any interference, stoppage or obstruction from government authorities and to provide a seamless offering online gaming services. For example, if for some reason, Government Authorities ban or shut down one of these subsidiaries/subdivisions, the online gaming activity will not be affected at all and online betting players will still be able to gamble and bet through other options. Websites/portals run by the Accused. One of the major reasons for the increasing popularity and demand of this Nexus is that it allows its game players to withdraw betting amounts on the same day. I say that, the arrangement of running multiple betting/gambling platforms in the same

ecosystem is was organized and planned by Accused No. 21 - namely Saurabh Rameshwar Chandrakar, Age 28 Years, address - ID, Street 34, Sector- 8, Bhilai, Chhattisgarh, 490009 and Accused No. 22 - namely Ravi Jagdishchandra Uppal, aged 43 years, address - Block 3, Plot 5, Nehru Nagar East, Bhilai, Chhattisgarh, Pin – 490020, the owners of the said Nexus. They have diversified the platform into many different names/portals so that even if the Government Authorities take any steps to shut down a particular Website/portal, the user base never diminishes. The main reason behind doing this is to avoid pressure and obstacles from government officials. Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai and Accused No. 3 namely Kumar (full name not known) currently resides in Dubai. They have large stakes in each of hundreds of subsidiaries/subdivisions. I say that from various social networking sites and the information uploaded by the Accused, I came to know that a person who wants to play online betting or gambling must register himself by clicking on the “Get ID Now” icon, on this Web Portal of Khiladi Book, the amount he can bet, specify the player who wants to play, give his email ID, mobile phone number and create a password. After such registration, the interested player is given a separate user ID. Such a registered player can contact or he is contacted through WhatsApp and two separate contact numbers are provided to him. Such WhatsApp numbers are changed from time to time, so that Law Enforcement Agencies cannot reach them easily. One contact number is provided for depositing money and collecting points in user ID, which is used for online betting/gambling. Another contact number is assigned to the user ID to connect to the web portal is given to encash the committed points, which are usually created across multiple Websites based on the player’s needs or preferences. A detailed step by step process explaining how to register as a player on the Khiladi Book can be described below. A person who wants to register himself as a player under Khiladi Book must do the following-

a) The user first comes across one of these platforms through advertisements posted on Websites/applications like Instagram, Facebook, Telegram, sometimes also posted by influencers. Advertisements are even placed on a platform called Liveline (Liveline is a platform where live updates of matches are shown and updates on television are 10 seconds late compared to real time match updates. So all the people who are serious about participating in betting activities are active on Liveline). I have attached Exhibit B to my complaint, a list of all the Telegram channels used to promote the new platform created by the said Nexus.

b) After finding advertisements through one of these means, the user clicks on the Website link and visits the said Web Portal. On the Website, usually on the sign up button, there is a redirect link to a WhatsApp chat with a number operated on WhatsApp by an Executive.

c) Working at the Head Office of the said Web Portal. Here, the Head Office immediately transfers the user to one of their Branch Offices. I have attached the list of all WhatsApp numbers used by the Head Office and the Branch Offices of all the primary and subsidiary platforms of the said Nexus as Exhibit C along with my complaint.

d) After starting the chat conversation, the Executive on the said Web Portal then sends links to multiple sites along with some demo user ID and password, which is used by the user/player. This happens when the user/player decides to choose one of the platforms and requests to create an account on the chosen platform.

e) Account is created by the Branch Office. The user then requests to recharge the account sharing the account number with the user through Executive chatting from the player Branch Office. After the user/player makes

the payment, the user shares a screenshot of the transaction which is then verified by the Branch Office. Once it is verified, tokens equivalent to the payment made by the user/player are loaded into the user's account on the said platform. (These bank accounts in which money is deposited by the user are all managed by the Branch Office, these are all corporate accounts with fake KYC information which are rented out to such malicious entities at an average of Rs. 1 Lakh per month).

f) Once the funds are credited to the user's account, the user then starts playing on the platform and on the basis of wins and losses the user requests a withdrawal and through the same channel, the funds are returned to the user. Bank accounts used by branches are of three types - 1) Incoming, 2) Withdrawal and 3) Parking Account.

h) When the user deposits funds to recharge his account, the amount is transferred to the incoming account and immediately transferred to the withdrawal account. At the end of the day, the balance funds are transferred to the parking account out of which an amount equivalent to 20 percent of the total amount is kept by the branch and the remaining 80 percent of the funds are sent to one of the 10 Branch Heads in the upper circuit allocated by Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai. I say that, collection of money, creation of user id, distribution of user ID and distribution of money is done by panel/branch owners. Significantly, all the gambling games are designed and rigged in such a way that the Accused persons including panel owners/branch owners never lose despite initial profits, who end up losing their hard earned money. Moreover, there is no KYC compliance in the said Websites/portals to verify the age of the players. I say that, Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai and Accused No. 3 namely Kumar (full name not known) currently residing in Dubai has recruited hundreds of Panel Owners / Branch Owners across the country and has retained

nearly 80 percent of the profits earned by such Panel Owners / Branch Owners. Any person who wants to become a panel owner / branch owner is required to deposit Rs. 20 lakhs with the said Accused or his associates for setting up a new branch. I am reliably informed that each Branch Head is entrusted with the duty of controlling at least a hundred branches in his network. The money collected by individual branches is transferred to the Branch Heads on a weekly basis after retaining 20 percent of the collected funds. I say that, Accused No. 3 namely Kumar (full name not known) currently residing in Dubai is working as a Consultant and Network Builder for the concerned relationship, who invests the un-lawful gains / proceeds from such illegal betting / gambling in parking lots in properties, hotels and various other businesses in India and invested abroad. Accused No. 3 is found to have purchased an expensive property worth \$20 million in London, United Kingdom. Accused No. 4 namely Shubham Soni alias Pintu, address: Bhilai Chhattisgarh known as Pintu, who is entrusted with the responsibility of managing all the branches of this relationship, who reports directly to Accused No. 5 namely Atul Aggarwal, address: Bhilai, Chhattisgarh. I have reliably learned that. Accused No. 6 namely Vikas Pawan Chaparia alias Chiku, Age 50 years, address:- Flat-2B, Block-B, Krishna Apartment, 269, Bangur Avenue, Kolkata, West Bengal, 700053 is manages approximately 200 Branches/Subdivisions of Nexus holds prestigious position like Branch Head.

Accused No. 6 namely Vikas Pawan Chaparia alias Chiku is closely related to Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai. Earlier, Accused No. 6 namely Vikas Pawan Chaparia alias Chiku was a partner of Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai in an online betting platform popularly known as Laser 247. I have also come to know that Accused No. 7 namely Amit Bombay, address: Mumbai and Accused No. 9 namely Abhishek (full name not known), address: Bhilai, Chhattisgarh are actively involved in the illegal business of Online Betting,

who are also holding top positions like Branch Heads in this connection. I say that, Accused No. 5 namely Atul Aggarwal, address: Bhilai, Chhattisgarh are found to be transferring profit from online betting/gambling through Website/portal through illegal hawala transactions to Accused No. 21 namely Saurabh Rameshwar Chandrakar Age 28 years, Address - ID, Street 34, Sector-8, Bhilai, Chhattisgarh, 490009 and Accused No. 22 namely Ravi Jagdishchandra Uppal, aged 43 years, address Block 3, Plot - 5, Nehru Nagar East, Bhilai, Chhattisgarh, Pin-490020 and others. I am shocked to learn that Accused namely Saurabh Rameshwar Chandrakar, Ravi Uppal, Shubham Soni, Atul Aggarwal, Lala (Dubai), Abhishek (full name not known) and Khanjam Jagdishkumar Thakkar, address: 714, 7th Floor, Plot CS-1487, Prasad Chamb Tata Road No. 2, Roxy Cinema Opera House, Girgaon, Mumbai City, Maharashtra and other unknown persons have committed the crimes of cheating, forgery, defrauding of valuable security in a well-planned and systematic criminal conspiracy. Use of fake documents for fraudulent purposes, illegal gambling and various Cyber Crimes, which can pose a serious threat to the sovereignty and integrity of India. Among various other gambling links, the Accused namely Saurabh Chandrakar, Ravi Uppal and others have created several gambling links, with the dishonest intention of inducing innocent and gullible players to engage in online betting/gambling, wrongful benefit to themselves and wrongful loss to them. I was shocked to learn that in order to prevent such illegal transfer of funds by the Law Enforcement Agencies, funds are transferred through illegal hawala channels, in cash or USDT, before disposal to specific individuals or specific accounts with the help of Accused namely Atul Aggarwal, Lala (Dubai) and Khanjam Jagdish Kumar Thakkar, who coordinate and organize hawala transactions. Accused No. 1 namely Rohit Murgai and Amit Jindal, residing at Delhi handles the conversion of all Khiladi Book profits into Crypto currency or USDT. A list of all primary and secondary/subsidiary Websites owned by this Nexus and its affiliates/partners is hereby attached as Exhibit D.

I say that the Accused namely Saurabh Chandrakar, Ravi Uppal having their Head Office is in Dubai. They create profiles of panel owners. The panel owners in turn create user profiles of players (known as Punters), who are induced to deposit money into certain designated bank accounts (most such accounts are unscrupulous or Benami accounts held in the names of fictitious persons). Information is given to panel owners by Accused namely Saurabh Chandrakar, Ravi Uppal. I am shocked to know that 20 percent of such proceeds are remitted either through dubious banking channels or through hawala transactions and share of panel members irrespective of final outcome of betting/gambling games. The remaining 80 percent of such income is retained by the Accused namely Saurabh Chandrakar, Ravi Uppal and their associates. Thousands of bank accounts have been opened by or at the behest of Accused Saurabh Chandrakar, Ravi Uppal and others not only in Chhattisgarh but in various parts of India in the name of unscrupulous or fictitious persons, which are changed from time to time to prevent Law Enforcement Agencies from accessing such bank accounts. Accused namely Saurabh Chandrakar, Ravi Uppal and others have run several call centers outside India to facilitate the promotion and playing of such online betting gambling. The list of bank accounts along with the name of the platform is attached hereto as Exhibit E. I say that as stated above, each Panel Branch operates 3 categories of bank accounts, known as “Incoming Account” “Withdrawal Account” and “Parking Account”. The interested player is advised to deposit money in advance in the incoming account. Once received, they are immediately transferred to withdrawal accounts to ensure sufficient funds for withdrawals. At the end of every month, every profit is transferred to parking accounts, which are used to remit 80 percent of the profits to Accused namely Saurabh Chandrakar, Ravi Uppal and the business heads. On an average each Panel Branch handles daily deposits of not less than 15 lakhs. After deducting all expenses and remitting 80 per cent of the profit to the Branch Head, each Panel Branch earns more

than 8 lakhs per month. On enquiry, I was shocked to learn that the Accused namely Saurabh Chandrakar, Ravi Uppal and his Various unknown co-operatives have 1200 branches (approx.) operating in several states of India. I was further shocked to hear that, the daily profit of each branch is collectively Rs. 2,40,000/-, resulting in a total monthly profit of Rs. 8,60,40,00,000/-. I mean an organization making such huge profits will be liable to pay GST not only on the amount received from users/players through deposits but also on the amount earned as profit, which may be 5000 Crores (approx.) for a financial year. Hence, since its inception in 2019, an amount of Rs. 15000 Crores (approx.) could be recovered as legitimate tax by the Government of India from Accused persons and related parties. However, the Accused have caused huge loss to the exchequer by not paying this statutory due, which needs to be seriously investigated. I say that, one of the members of such panel, namely Accused No. 12 namely Chandrabhushan Verma, aged 47 years, residing at - Opposite MLA Dhananjay Sahu Residence, Santoshi Nagar, Raipur, Chhattisgarh, Pin-492001 Chhattisgarh works as contact person, Accused namely Saurabh Chandrakar, Ravi Uppal and others were found to be receiving the said amount through hawala transactions every month. It was found to be distributed by way of "Protection Money" among Senior Police Officers and Political Leaders. I say that, not only the local Police Officers or IAS/IPS Officers are involved in this illegal conspiracy, but also many other elite persons including Accused No. 21 Saurabh Chandrakar. I am shocked to know that Senior Political Leaders belonging to the Indian National Congress Party are closely related to Accused No. 21 Saurabh Chandrakar. One such Senior Political Leader is understood to have attended a personal family function organized by the Accused namely Saurabh Chandrakar. Especially in 2022, this Senior Political Leader of the Indian National Congress Party was present at a family event organized by Saurabh Chandrakar. It is clear from the above program that the Accused namely Saurabh Chandrakar has got the blessing and patronage of Senior Political Leaders. Accused in general and in

particular Accused namely Saurabh Chandrakar are actively involved in match fixing of major cricket matches/tournaments organized and conducted in India with dishonest intention of earning profit from such match fixing. In fact most of the matches of the teams participating in this cricket league are fixed by the Accused namely Saurabh Chandrakar. To effect the criminal activities of match fixing, its main source is Accused No. 14 namely Dinesh Khambat, residing at London and Accused No. 15 namely Chander Aggarwal. These persons are the partners and are considered to be top match fixers in India and also run several betting sites where they partner with Accused No. 2 namely Amit Sharma. I submit that, a detailed investigation will also reveal that Accused No. 15 namely Chander Aggarwal has backdoor entry and / or indirect involvement in the team participating in this cricket league. He is known to be directly related to Accused No. 16 namely Mohit Burman, address Elphinstone Building, 3rd Floor, 10 Veer Nariman Road, Fort, Mumbai, Maharashtra - 400001 with whom he had committed his illegal acts. With whom he coordinates/connects through Accused No. 17 namely Hemant Sud, residing at Dubai (accomplice of Chander). Accused No. 17 namely Hemant Sud, residing at Dubai has deep connections and is usually the connecting point for all Chander's connections. Accused No. 14 namely Dinesh Khambat and Rohit Kumar Murgai along with the above Accused are also connected with Accused No. 16 namely Mohit Burman and Accused No. 18 namely Gaurav Burman, who has direct equity in one of the teams participating in the cricket league. Incidentally these Accused have entered into partnership together to control, operate and run the Website / Portal of Khiladi Book. The entire relationship between the Accused persons including Accused namely Mohit Burman, Gaurav Burman and Hareshbhai Kalabhai Choudhary and their other associates / partners in relation to their involvement in the criminal activities of match fixing of cricket matches by participating teams, evidence can be obtained from their networks is hereby attached as Exhibit F for convenience. Accused managed to acquire such large number of customers / players and huge amount of money with the help,

assistance and assistance of persons who are highly technically competent and have expert cyber knowledge. These individuals are the backbone of the entire cyber Nexus. To name a few, the Accused namely Harebhai Kalabhai Chaudhary and Bharat Chaudhary are the two key individuals who provide technical information on how to help the Accused. As far as Accused Hareshibhai Kalabhai Chaudhary is concerned, he is the key technical person in this connection. I say that initially, Accused namely Hareshibhai Kalabhai Chaudhary was working with Accused No. 14 namely Dinesh Khambat. Accused Dinesh Khambat introduced Accused Hareshibhai Kalabhai Chaudhary to Accused Saurabh Chandrakar. Since then the Accused Hareshibhai Kalabhai Chaudhary has created an entire network of cyber systems. Accused No. 21 namely Saurabh Chandrakar to enable his illegal activity of online betting to run his business not only anonymously but through hundreds of subsidiaries / subdivisions. In order to reward Accused No. 19 namely Hareshibhai Kalabhai Choudhary for his aforesaid cyber services, Accused Saurabh Chandrakar has given an astronomical amount of profit to Accused Hareshibhai Kalabhai Chaudhary out of proceeds of crime. I submit that Accused Bharat Choudhary has been working for Accused Saurabh Chandrakar for the past several years, who was involved in this relationship at the very initial stage. Therefore, his participation in all activities of this Nexus is important. I say that, apart from the Accused Hareshibhai Kalabhai Chaudhary and Bharat Chaudhary, there are many other unknown Accused who provide technical assistance to the Accused in carrying out their illegal business of online betting. Therefore, it is important to investigate and identify all those individuals who have expert cyber knowledge and act as the backbone of the entire relationship of subsidiaries/subdivisions formed under the umbrella of the relationship. These experts come at a huge cost considering that even creating a new Website / portal can cost more than Rs. 1 lakh. It is quite shocking and unbelievable that these cyber experts and computer engineers live a luxurious life in a city like Dubai, UAE with a monthly salary of Rs. 1 lakh.

Another important angle that needs to be thoroughly investigated is the aspect of dealing through Crypto currency. It is common knowledge that Crypto currency is banned in India for its use and trade. In fact, the Reserve Bank of India considers Crypto to be a pure form of gambling. In fact, it refers to Crypto as a form of gambling without any fundamental value and is synonymous with the word speculation. Despite this, the above Accused along with their unknown accomplices are dealing in astronomical amount of Crypto currency. Accused Saurabh Chandrakar has several Crypto addresses (equivalent to bank accounts), some of which are as follows

- a. TCgPL5JPd4BWAYRkY2gFYgNyY4C8rg3F2s (Bitcoin),
- b. 0xc0967bdb6b78d0eb23cc71b0222c14decb0239f2 (Ethercoin)

Accused Saurabh Chandrakar will use the above two addresses for receiving and transferring money transactions along with other Crypto addresses. In fact as far as one such transaction is concerned, the Accused Saurabh Chandrakar received an amount of USD 2,078,318.38 (Rs 17,29,98,494.54/-) in his Bitcoin wallet. Transactions on a Crypto address are recorded in the form of a hash ID. In this regard, below are the transactions (Hash ID) of Accused Saurabh Chandrakar's bitcoin wallet.

- (a) 7c990a90925f6a9520d041cb77bba41ef6fb105c1ae9a88e7b48bf191a68fbb2
- (b) b07d017346aa16d8535f5f5bd72b9ad1155376b96b6281164bf1d20fb4ce8e56
- (c) 91343a57e5d760da41296627faafa124fc410ba78fc5e218ffee094bfff81f28
- (d) 23a2c13b2897f62e4086827898ff143dccbd0178c496b5518dca4b85cfbfaab1

Other such transactions made by Accused Saurabh Chandrakar on his Ethercoin address are as follows-

- (a) 0x23b4901bab56f30279f477390b9c017f1bf8774fdb16f1fef7211f4875ef04de,
- (b) Ox055993e9955964fd14136216365ea9221ae84eef90b8811be0cc51cdb5f44deb,
- (c) Ox9411adfa1797f7ee0eaa52ac5dca2840718b12cf3e36afde6fa67d95329373eb

In fact, at one point of time, Accused Saurabh Chandrakar received an amount of USD 26,224,576 (Rs. 218,29,24,527.64/-) to his Ethercoin address. Attached herewith and marked Exhibit 'G' are the details of certain transactions in which the Accused persons received money through Crypto currency accounts. Considering that the above mentioned transactions are for hundreds of crores of rupees, it is obvious that the transactions made by the Accused Saurabh Chandrakar in his Crypto wallet were of astronomical amounts. As a result of the above, it is important to thoroughly investigate several aspects of transactions through Crypto currencies. First of all, it is important to check the other addresses/Crypto wallets held/used/used by the Accused persons for transacting through Crypto currencies. There are reasonable grounds to believe that the Accused has multiple addresses/Crypto wallets for conducting illegal transactions of transferring unaccounted funds. Only an examination of the above Crypto addresses/Crypto wallets will reveal the exact amount of money transferred and/or illegally transferred by the Accused. It is worth noting that when a single transaction can run into hundreds of Crores as mentioned above, the total volume of transactions would be at least 10 times that amount. Therefore, it is important to identify the origin, source, owner and operator of the Crypto addresses/wallets operated by the Accused and their associates. Secondly, although some steps have been taken to identify the exact nature and level of transactions, the steps taken are not sufficient to prevent or secure further criminal activity. For example, even if the assets of the above Accused persons are to be seized, it cannot be done without knowing the exact exposure they have or the amount involved. Therefore, in the present case appropriate steps must be taken in relation to and correlative to the amount involved. Thirdly, there is a ban on dealing in Crypto currencies in India. It is clear that the Accused chose to transact through these further transfers to avoid the attention of law enforcement agencies in India. Because transactions on Crypto platforms are completely anonymous and known only to the persons making such transactions. Without a thorough

investigation of these aspects it is impossible to identify the origin and destination of any money transfer. As all the funds are transferred to the finance wallet, it would be highly relevant to do due diligence regarding the said finances and obtain KYC documents linked to the above accounts/addresses. It will also be necessary to receive IP logs, contact details, email accounts etc. to further investigate the transactions done on Crypto channels. Another angle that needs to be investigated is that a new entity, which was owned, operated, controlled and operated by the Accused Saurabh Chandrakar by the name of Sports Buzz. Sports Buzz is a Gurgaon-based firm actively involved in online betting/gambling and other similar services. I say that Accused Saurabh Chandrakar has strong connections with underworld persons. Accused Saurabh Chandrakar is known to be closely related to Accused No. 2 namely Amit Sharma and Accused No. 3 Kumar who are associates of Mushtaqeen. Accused Saurabh Chandrakar is understood to have met Mushtaqeen on several occasions and it is learned that he met Mushtaqeen at his residence in UAE in connection with this agreement. It is widely talked about among the sports lovers that due to the influence and connections with the help of the said Mushtaqeen, the management of IFFA 2022 decided to enter into a sponsorship deal with the said Sports Buzz. Curiously, though Sports Buzz and IFFA 2022 signed an agreement, the money paid for the title sponsorship was transferred not by Sports Buzz but through Accused No. 2 namely Amit Sharma. It is clear from this that Accused Saurabh Chandrakar not only has underworld connections but also helps people associated with underworld to enter into deals and earn proceeds of crime. Hence further investigation is required to identify the real connection and connection of the Accused with the underworld persons. The possibility that money transferred and owned by people in the underworld was used for terror funding or illicit drug trade cannot be ruled out at the behest of Accused Saurabh Chandrakar. Another aspect which forms part of the criminal activities carried out by this conspiracy is Accused No. 30 namely Wasim Qureshi. He is a Mumbai-based

Producer and Director with a production house namely Qureshi Productions Private Limited. He has produced a Reality Show for MTV titled “Mr. and Miss 7 States” featuring celebrities like Sonu Sood, Mugdha Godse, Rohit Khandelwal and has also directed a music video titled “Teri Rooh” featuring popular TV actress Shakti Arora and social media influencer Nisha Guragai. Accused Wasim Qureshi also produced Renuka Panwar’s Haryanvi music video “Rel Mein Dhakke Lage Se”. The production house is also in talks to release their first feature film with some well-known starcasts from the Bollywood Film Industry. However, before this, Accused No. 30 namely Wasim Qureshi was involved in illegal betting/gambling and was working as a Marketer in this connection. In fact, he is considered as one of the top tippers for cricket matches and has a strong following on the Mobile App Telegram, where he provides these tips. He used his followers on the said app to get a large following. The procedure adopted by Accused Wasim Qureshi is similar to that adopted by Accused No. 24 namely Ranveer Roy. Recently, Accused Wasim Qureshi had also announced a historical film on the life of Chhatrapati Shivaji Maharaj casting Bollywood celebrity Akshay Kumar. The shocking part of this whole scheme is that the Accused Wasim Qureshi’s organization has not crossed the annual gross revenue of more than Rs. 60 lakh since its establishment. Then the question arises as to how this organization could afford to hire A-list Bollywood Celebrities, produce high quality films/music videos, spend casually on promotions and marketing etc. It is said that the Accused Wasim Qureshi acted as a Broker in the meantime for Accused Saurabh Chandrakar and some government officials to negotiate and settle the proceedings initiated by the government officials against the said Nexus. These transactions/negotiations took place through intermediaries such as Apoorva Atul Kothari from UAE and Singapore and further financial transactions with Shri Mohit K. Chadha, Aditya Kanoria and Arunkumar Ganeriwala owning an NBFC namely Credent Global Finance Limited. Accused Saurabh Chandrakar also owns a very prominent online gaming and betting platform called

‘Fairplay’, which claims to be ‘India’s largest and most trusted online betting exchange’. Accused Saurabh Chandrakar is in partnership with Sunil G. P., other unknown persons and person namely Mahesh Taurani. It is reliably learned that the recent dilution of equity has shown that the total valuation of the said organization is Rs. 2200 Crores (approx.). I say Accused Saurabh Chandrakar, out of the total profits from his Nexus branch, investing huge amount of money in a leading real estate company and controlled by Dubai based Mahesh Taurani. Accused No. 2 namely Amit Sharma, address: Vileparle, Mumbai and Accused No. 3 namely Kumar (full name not known) currently residing in Dubai who is partner with Mushtaqeen (brother of Underworld Don Dawood Ibrahim) are also investing their money with some major Developers in Mumbai and Mira Road. I say that, this entire nexus of hundreds of branches with numerous Websites/portals offering illegal gambling and betting services is owned, controlled, managed and operated by Accused Saurabh Chandrakar and Ravi Uppal under the banner of Mahadev Book. I was shocked to learn that the Accused had created a sophisticated network of UPI IDs to facilitate money laundering, through which they created a labyrinthine structure of Benami (proxy) bank accounts. Each UPI was associated with an ID, which was used to form the funnel. And to trace the flow of funds generated from illegal betting activities, the use of UPI IDs allowed the Accused to obscure the origin and destination of funds, making it challenging for law enforcement agencies to detect and intercept these transactions. As the Accused have succeeded in making astronomical income of hundreds of Crores of rupees from the above illegal betting/gambling and have subsequently succeeded in pocketing the un-lawful gains, by presenting the illegal income as if it were a legitimate business procedure, the Accused have posed a serious threat to the sovereignty and integrity of India. There is a high possibility of misappropriation of such windfalls for illegal drug trade or procurement and supply of explosives, arms or sophisticated weapons which seriously affects the sovereignty and integrity of India. The illegal activities of the Accused corrupt

the tender minds of the youth and they become victims of such illegal betting/gambling which ruins their youth and professional career as there is no age limit or KYC requirement of those Players, who are allowed to play on these Websites / portals. However, in connivance with all the above Accused, from the year 2019, on various social networking sites like Facebook, Instagram, Google Ads, by spreading information about Khiladi Book and many other Websites / Web Portals, Cricket, Football, Tennis, Casino, Teen Patti (three card game) were posted on the said Web Portal. And by inducing people to play online betting/gambling on various other games by diverting their paid money into Benami accounts and deceiving the people who play it for their own financial benefit. The proceeds were invested in properties, hotels and various other businesses in India and abroad and the said Accused have caused a loss of estimated Rs. 15,000 Crores to the Government of India in the form of taxes by operating the said illegal online betting/gambling without paying any tax. Hence I am having legal complaint against them under Section 12(a) of the Maharashtra Gambling Prevention Act and Section 66(d) and 66(f) of the Information Technology Act, 2000 along with Sections 420, 465, 467, 468 and 471, 120 (b) of the I.P.C.

My above answer is written in Marathi and when I have read it, it is correct and true to the best of my knowledge and as stated by me.

Before me,

(Sanjay Pardeshi)
Police Inspector
Matunga Police Station, Mumbai.

13. Action taken: Since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2:

(1) Registered the case and took up the investigation:

or

(2) Directed (Name of I.O.):

Sanjay Subhash Pardeshi

Rank: I (Inspector)

No.: DGPSSPM8316

to take up the Investigation

or

(3) Refused investigation due to:

or

(4) Transferred to P.S.

District:

on point of jurisdiction.

F.I.R. read over to the Complainant/Informant, admitted to be correctly recorded and a copy given to the Complainant/Informant free of cost.

R.O.A.C.

14. Signature/Thumb impression of the Complainant/Informant:

Sd/- XXX

15. Date and Time of dispatch to the court:

Sd/- XXX

Signature of the Officer in charge,

Police Station: Matunga Police Station,
Mumbai.

Name : Sanjay Pardeshi

Rank : Police Inspector