

In the Court of :

Extra Jt. District and Sessions Judge, Nanded

Case No.: Sessions case / 0100014/2007

State of Mah v/s Rahul Manohar Pande and others,

May it please Your Honour,

The applicant, Yashwant Sahdev Shinde, age 49 years, occupation business, residing at 279/C15, Sambhajinagar Society, N.M. Joshi Marg, Mumbai-400013, states on solemn affirmation as follows.

The applicant has been associated with Vishwa Hindu Parishad (VHP), Rashtriya Swayansevak Sangh (RSS) and Bajrang Dal since 1990 i.e. since the time he was 18 years of age. He worked in these organisations in various capacities at the state and national levels.

In early 1990s when he got to know through T.V. and newspapers that Hindus in Jammu and Kashmir were being brutally killed and driven out by terrorists, he went to Jammu in 1994 and met the Himgiri Prant Pracharak of RSS Indresh Kumar. Indreshji appointed him as the 'Vistarak' of Rajouri and Jawaharnagar which were on Pakistan border.

In December 1995 the Ex. C.M. of Jammu and Kashmir Dr. Farooq Abdullah visited Rajouri. The applicant attended the meeting of the local people called by Dr. Abdullah. The applicant was annoyed by one of the statements of Dr. Abdullah which he thought was anti-national and he hit Dr. Abdullah on his face. He was immediately arrested and was taken to Rajouri police station. An offence was registered against him and he was handed over to Terrorism Interrogation Branch of Jammu for further investigation. He was released on bail after 12 days; but was again arrested under the Public Safety Act. He was released from jail after four months. A trial was conducted against him and he was acquitted by the court in 1998.

The applicant had done the preliminary training class of RSS (Prathmik Sangh Shiksha Varg) in 1994. He completed the second level of RSS training class in 1996/97 at Chandigarh. Then he was appointed as the "Pracharak" of Riyasi Tahsil in Udhampur district of Jammu.

He returned to Mumbai in 1999 and was made the Chief of Bajrang Dal. While working in Bajrang Dal, he got to know one Milind Parande. He was the head of Maharashtra unit of VHP.

Because of some differences in the organisation, he left Bajrang Dal and decided to work in the students' organization "Garjana" which was the aggressive wing of the Akhil Bhartiya Vidyarthi Parishad (ABVP). He toured in many districts of Maharashtra and tried to build the organization. But owing to financial constraints his movements were restricted and the organization could not grow as expected.

In 1999, while the applicant was in Maharashtra, Indresh Kumar told him to get hold of some boys having fighting spirit and take them to Jammu where they would be trained in the use of modern weapons. For selecting the boys for the purpose there was a state-level meeting of VHP in Thane (Maharashtra). In that meeting the applicant got introduced to one Himanshu Panse of Nanded. That time Himanshu Panse was the full time worker of the VHP in Goa. He and his 7 friends were selected for training. The applicant took Himanshu and his 7 friends to Jammu. There they received training in modern weaponry from the Indian Army jawans.

In the year 2000, four RSS Pracharaks had been kidnapped from near Baptist Church in Agartala of Tripura. Kendriya Prasar Pramukh (Central Propaganda Chief) of RSS Shrikant Joshi gave the applicant the responsibility of tracing them. During that operation he travelled in Agartala and some districts of West Bengal. During his tour of West Bengal, at the Sangh office in Kolkata Shrikant Joshi introduced him to then RSS 'Sahkaryavah' (the present RSS Chief) Mohan Bhagwatji.

The kidnapers of the four Pracharaks had asked for a ransom of two crores for their release. But the RSS refused to give that amount. Thereafter, during the course of the search operation the search team headed by the applicant got to know that the Pracharaks had been killed by the kidnapers. This fact was also confirmed by the central government.

After sometime, one day Srikanth Joshi informed the then Home Minister Lal Krishna Advani that the two leaders of the group which had kidnapped and killed the pracharaks, were getting down at Delhi airport on that day and requested him to arrest them. But Mr. Advani did not arrest them for the fear that the christian voters in Purvanchal would be displeased. The

applicant was deeply distressed by the selfish behaviour of BJP leaders and started distancing himself from them. He maintained contact only with Srikanth Joshiji.

Though the applicant was away from the BJP, he received a message in July 2003 that there was an important meeting at Gol Deul (round temple) of Khetwadi area in South Mumbai and he should attend the meeting. He went for the meeting at the given time. There were only two persons. They were the members of RSS and were close associates of Milind Parande who was the leader of VHP, Maharashtra Prant.

These two persons informed the applicant that a training camp in bomb-making was going to be organized shortly and thereafter, there was a plan to cause bomb blasts throughout the country. They put forth the proposal that he should take responsibility for carrying out maximum bomb-blasts in various parts in the country. He was shocked but did not show on his face and asked them in a lighter vein whether it was a preparation for 2004 Lok Sabha elections. They did not answer.

Though the applicant did not approve of the plan he did not express it openly. He decided to pretend to be a part of the conspiracy so that he would know the persons involved in it and he attended the bomb-training camp held near Sinhgad in Pune. It was a three day camp organized in a resort at the foot of Sinhgad fort. About 20 youths from Aurangabad, Jalgaon, Nanded etc. districts of Maharashtra were present for the training. Himanshu Panse of Nanded was also present. He had already informed the applicant about the camp and the applicant had cautioned him and had tried to dissuade him. Apparently he did not listen to him. Seeing the applicant at the camp, Panse was surprised and appeared to be nervous. Milind Parande was the mastermind and main organizer of the camp.

The training was being imparted by a person who called himself "Mithun Chakravarty". (Later the applicant came to know that his real name was Ravi Dev and he was the activist of Bajrang Dal). One Rakesh Dhawade used to bring him to the place of training and take him back. He was the same Dhawade who was later arrested in Malegaon 2008 blast case.

The said Mithun Chakravarty would reach the camp at 10 a.m. and would conduct the training for two hours in different groups. The trainees were given material like 3-4 kinds of explosive powders, pieces of pipes, wires, bulbs, watches etc. for preparing bombs. Once during the camp a major mishap was averted. Because of Mithun Chakravarty's mistake a half burnt

match-stick fell very close to the explosive powders. Mithun Chakravarty himself shouted “kand hote hote bach gaya”.

After the training the organizers took the trainees in a vehicle to a secluded forest area for testing the bombs by carrying out rehearsal of blasts. The trainees would dig a small pit, put the bomb with timer in it, cover it with soil & big boulders and detonate the bomb. Their tests were successful. There were big blasts & the boulders were thrown away to long distances.

Rakesh Dhawade who was bringing Mithun Chakravarty to the training site was also in charge of accommodation and other arrangements of the trainees at the centre. In the night before the last day of the training, he gave all the trainees pen and paper and asked them to write down whether they would be able to do bomb blasts; and if so where? The applicant took strong objection and told him that this was not a matter to be given in writing. He refused to give anything in writing. Others also refused.

After the camp, the applicant went to Nanded several times and tried to convince Himanshu Panse not to indulge in bomb-blasts, as it was a Sangh Pariwar’s conspiracy to ensure BJP’s victory in the election. During his visits to Nanded, he also got to know Himanshu Panse’s friend Kondawar, who was also from Nanded. The applicant cautioned Himanshu repeatedly. He would say yes for applicant’s satisfaction. But it appeared that he was pressurised by the leaders and hence continued causing blasts. After the training Himanshu had caused three blasts in Marathwada region of Maharashtra. He had a plan to cause a major blast in the main mosque in Aurangabad and while making a bomb for that blast he lost his life in Nanded in 2006. His friend Kondawar was also killed in the blast.

Sometime in 2007, i.e. about four years after the Sinhgad training camp of 2003, the applicant saw Mithun Chakravarty in Mumbai’s main RSS office “Yashwant Bhavan” which is at Parel in Mumbai. Somebody at Yeshwant Bhavan informed the applicant that Mithun Chakravarty’s real name was Ravi Dev. Till then the applicant was not knowing his real name. When he called him out as “Raviji”, he looked at the applicant, but did not recognize him. He asked him “How do you know me?” When the applicant told him that he was coming to Sinhgad for giving training in bomb-making, Ravi Dev’s facial expressions changed. He got scared and hurriedly went away from there. The applicant went behind him. Ravi Dev met Milind Parande and looking at the applicant whispered something in his ears. Parande also appeared to be scared as he might have suspected that the applicant had also got to know about his involvement in the

conspiracy. In fact, the applicant already knew that he had been involved as Himanshu Panse had informed him that Milind Parande was the master mind of the plan of country wide bomb blasts.

The RSS and BJP leaders had intentionally included the applicant in this project as they knew that if he wanted he could do blasts throughout the country. He had contact with “Garjana” in Maharashtra, with ‘Hindu Yuva Chhatra Parishad’ in Jammu-Kashmir, Punjab, Haryana, Assam and UP, with ‘Shri Ram Sena’ in Karnataka and with senior leaders like Tapan Ghosh in West Bengal. If he wanted he could have caused 500-600 bomb blasts. But as he knew the ulterior motives of the leaders, he scuttled their plan and did not allow it to succeed. He also convinced Tapan Ghoshji about the ill-motive of the leaders. Tapan Ghosh agreed with him and distanced himself from these nefarious activities. Likewise Pramod Mutalik of Shri Ram Sena of Karnataka who was close to Tapan Ghosh, also did not do anything. Thus, the applicant sabotaged the destructive plan of RSS and BJP and saved the lives of many innocent Hindus, Muslims and Christians.

As the RSS and VHP’s plan of causing blasts throughout the country was not as successful as was expected the BJP was not politically benefitted. Consequently in the 2004 elections Congress party got the majority. The persons like Milind Parande who were the main conspirators were scared and went underground, but they continued hatching conspiracies secretly. By remaining underground they carried out many bomb-blasts across the country and with the help of biased police and one sided media blamed them on Muslims. That helped them in 2014 Loksabha elections.

In 2014 BJP captured power at the Centre and Narendra Modi became the Prime Minister. This resulted into sudden activation of all the underground destructive forces belonging Vishwa Hindu Parishad and Rashtriya Svayamsevak Sangh (RSS). The applicant could see that the same people were behind terrorist anti-constitutional activities at West Bengal, Jammu and Kashmir, Uttar Pradesh, etc. and were deliberately trying to create distrustful and fearful atmosphere throughout the country. Milind Parande has again become active and is working on instructions of BJP leaders and has taken a ‘supari’ (contract) for destructive activities. The applicant had informed about destructive plans of Milind Parande to senior Vishwa Hindu Parishad leader Mr. Vyankatesh Aabdave and had also informed the same to Central level working committee member of Rashtriya Svayamsevak Sangh (RSS) Mr. Shrikant Joshiji; but they did not take any action against Milind Parande. At present Milind Parande is occupying

very high position in VHP. He is VHP's 'Kendriya Sanghatak' (National organizer) and he sits in the VHP's main office at R.K. Puram in Delhi.

The applicant, time and again raised his concern as to why Rashtriya Svayamsevak Sangh (RSS) and Vishwa Hindu Parishad (VHP) workers are being used for the benefit of BJP. He met Mr. Aabdev several times at Vishwa Hindu Parishad main office situated at Firoza Mansion Mumbai and asked him why he was not doing anything in this regard. For the sake of applicant's satisfaction he used to say he would look into it, but did nothing. When the applicant met Shrikant Joshi and asked about the same concern he informed him that he had a talk with Mr. Mohan Bhagwat, the then Sakharyavahak (the present Sarsanchalak) of Rashtriya Svayamsevak Sangh, but the latter expressed his inability to help in any manner. After listening to the excuses of these leaders, the applicant came to the conclusion that the senior leaders of the RSS and VHP tacitly supported terrorist activities and that after the BJP govt. came to power in 2014, they have been further encouraged and have been assiduously engaged in such activities

The applicant has a firm belief that Hindu religion is a very noble religion. Hindus, in general, are not of terrorist tendencies. But some Hindu organizations like RSS, VHP, Bajrang Dal are definitely engaged in terrorist activities for the political gain of BJP.

Whatever the applicant has stated above is true to the best of his knowledge and belief :

- 1) The incidents he has mentioned in the petition can be verified from the govt's record or from the news-reports of the relevant period.
- 2) He is ready to be confronted with the leaders and other persons mentioned by him in the petition.
- 3) He is prepared to give evidence in the court in this regard.

The applicant's above mentioned averments concerning the nation-wide conspiracy have been vindicated by many bomb blasts that had taken place since 2003. The Nanded bomb blast of 2006, of which the trial is going on in this Hon'ble Court was also the result of this conspiracy. Himanshu Panse and his associates, who had undergone training in bomb-making at Sinhadgad near Pune in 2003 had been preparing a bomb to cause a major blast in Aurangabad, as a part of this conspiracy.

The applicant is an important witness in this case, as he had attended the terror training camp at Sinhadgad alongwith the accused involved in this case. Moreover, the applicant was a

privy to the conspiracy when it was first mooted in Gol Deul (round temple) in Khetwadi Mumbai in 2003. It is , therefore, requested that the applicant be made a witness in this case. He is prepared to be examined and cross examined on any of the points mentioned in this application.

Moreover, as far as the applicant knows, the main conspirators in this case viz. 1) Milind Parande, 2) Rakesh Dhawade, who had been the main organizers of the training camp at Sinhgad near Pune and 3) Ravi Dev (Mithun Chakravarty) who imparted training to the accused in bomb making, have not been arrested and made accused in this case. As far as the applicant knows their whereabouts are as given below :

- 1) Milind Parande is presently 'Kendriya Sanghatak' (National Organizer) of VHP. He sits in the VHP's main office at R.K. Puram, New Delhi.
- 2) Rakesh Dhawade is from Pune. He was arrested in Malegaon 2008 blast case and in some other blast cases. Presently he is on bail.
- 3) Ravi Dev (Mithun Chakravarty) resides in Haridwar and his mobile number is 9411786614.

The applicant states that the above three persons are the main conspirators in the Nanded blast case of 2006. Hence, the applicant requests that they be made accused in this case and be tried.

Hence the prayer :

- 1) The pplicant may please be made a witness in this case, and
- 2) The main conspirators Milind Parande, Rakesh Dhawade and Ravi Dev may please be made accused and be tried in this case.