

IN THE SUPREME COURT OF INDIA
CRIMINAL APPELLATE JURISDICTION

CrI.M.P. No. OF 2017

IN

SLP (CrI.) NO.5777/2017

IN THE MATTER OF:

Shafin Jahan ... Petitioner

VERSUS

Asokan K.M. & Ors. ... Respondents

AND IN THE MATTER OF:

Sumati Aarya ... Applicant

WITH

[I.A. NO. _____ OF 2017]
APPLICATION FOR IMPLEADMENT

AND

[I.A. NO. _____ OF 2017]
APPLICATION FOR DIRECTIONS

PAPER: BOOK

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ADVOCATE FOR THE APPLICANT:
GP CAPT KARAN SINGH BHATI

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Sumati Aarya

[REDACTED]

... Applicant

APPLICATION FOR IMPLEADMENT

TO

THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUSTICES OF THE
HON'BLE SUPREME COURT OF INDIA

THE HUMBLE APPLICATION OF THE
APPLICANT ABOVE NAMED:

MOST RESPECTFULLY SHOWETH:

- 1) The present is an Application for Impleadment of the Applicant viz. Smt. Sumati Aarya as Respondent in the aforesaid SLP (CrI.) No.5777 of 2017 titled as "Shafin Jahan Vs Asokan K.M. & Ors.".
- 2) The present Application is being filed by the Applicant viz. Sumati Aarya, resident of [REDACTED]

████████████████████, a converttee to Islam and Savita Narsingh Rao Madan Sure, who was abused and sold off by her own father in the name of fraudulent marriage. She suffered immeasurable physical, mental, psychological and emotional torture since her childhood, throughout her so called marriage and was finally able to find courage to run away for the sake of her two daughters, lest they would have been meted out with the same fate. The Applicant is an unfortunate women, whose father was part of the racket and conspiracy. She saw and experienced her cousin sisters and several other girls/women being abused and tortured by her father as also her so called husband. They forced the Applicant to convert to Islam and tried to get her indoctrinated to join and support the activities of SIMI, ISIS and Dr. Zakir Naik.

- 3) The Applicant learnt about the aforesaid proceedings going on before this Hon'ble Court and the fact that this Hon'ble Court has taken cognizance of fraudulent marriages being perpetrated on young and impressionable girls, solely for the purpose of using, misusing and abusing them in furtherance of anti-national activities of Jihad. The Applicant with her extremely constrained and limited wherewithal has been trying to

get the authorities to take cognizance of the gruesome offences having been committed on her, as also the organized, well orchestrated and motivated scheme, of which her father and so called husband are the chief perpetrators, ruining the lives of dozens of young girls/ women.

- 4) The Applicant has firsthand knowledge and experience of the techniques adopted by these persons for over last two decades, wherein first they identify young girls who can be easy targets and start creating fabricated and fraudulent age proof as school certificates. Before the girls turn major they are shown as major on fabricated school certificates. These young girls are raped, physically and sexually exploited and sold off to older men. Depending on the level of maturity, resistance and understanding of these girls, they are either used in trafficking, prostitution or fake marriages. Girls who are in the position of least resistance are often sold off in fake marriages, after which the abuse continues but alongwith that efforts of indoctrination into anti-national activities of Jihad are forced. Some girls get influenced by years of sustained physical, mental and psychological torture and get completely indoctrinated. These girls are then used as

part of the racket to attract and recruit more young targets.

- 5) The Applicant has seen from close quarters these nefarious and illegal activities, which also involve extensive interaction with foreigners, specially people from Syria, Afghanistan and Pakistan. There is also inflow and circulation of huge amounts of unaccounted money, both in bank accounts as also in cash, illegal weapons and prostitution.
- 6) It is submitted that the Applicant was also cajoled, coerced and forced to read literature propagating Jihad of SIMI, ISIS and Dr. Zakir Naik. She was expected to also spread and propagate this literature propagating Jihad to young impressionable and vulnerable girls of Hindu community. Even the slightest resistance to fall in line use to be severally punished by immeasurable physical torture. The Applicant was assaulted with rods at her private parts so that it would not be visible to society.
- 7) It is submitted that despite the best efforts of the Applicant, she has not been able to get the authorities to take cognizance and investigate into these activities. The Applicant is approaching this Hon'ble Court directly,

praying for necessary directions and comprehensive investigations in her case, so that truth can be unravelled and dozens of young girls are saved from the vicious cycle of abuse.

- 8) It is respectfully submitted that the mother of the Applicant is a Hindu and father is a converted Muslim. Even their marriage has been a sham as Applicant's mother was sexually assaulted and beaten up by her father and always tortured to join and support the activities of Jihad. Her father had sexual relations and marriage kind of associations with several women and girls.
- 9) It is respectfully submitted that Mr Bhav Rao Ahmadabade never accepted the Applicant as her daughter and he used to sexually assault her and had committed rape on her several times as a young girl and always forced her to convert to Islam.

It is pertinent to mention here that there are many criminal cases related to rape and murder pending against the Applicant's father.

- 10) It is respectfully submitted that the Applicant here is suffering from skin cancer but the Applicant's father never

considered her condition and kept on taking undue advantage of her.

It is pertinent to note here that when Applicant used to study in Dr.D.Y.Patil College, Pune her condition had become very critical because of which she used to collapse several times that very moment in her unconscious state the Applicant's father and his friend i.e. Applicant's supposed husband used to go to her room and rape her and take her nude photographs.

- 11) It is submitted that the Applicant's father's friend blackmailed the Applicant showing her nude photographs and thus forced her to get married to her.
- 12) It is respectfully submitted that the Applicant was forcefully married on 18.02.2004 at Latur, Maharashtra and after that her life had become even more of living hell as she was brutally beaten up and was sexually assaulted. The Applicant had to undergo abortions 6 times due to this inhuman treatment.

It is pertinent to note here that the Applicant was raped by her father even after marriage and all this was done to force the Applicant to follow Islam and join Jihad.

13) It is respectfully submitted that the Applicant has two daughters viz. Sumedha Arya and Vineeta Arya born on 05.01.2008 & 30.08.2009, these two were able to survive because at the time of their delivery the Applicant's supposed husband was out of country. The Applicant's supposed husband on gunpoint had made the Applicant sign several blank pages, documents and affidavits where it was stated that the Applicant was willingly getting converted into Islam.

It is further submitted that the Applicant's father and so called husband has taken nude photographs of her and her daughters and blackmails the Applicant for the same stating that he will sell them also.

14) It is respectfully submitted that fearing for the life and wellbeing of his daughters, the Applicant managed to run away from Pune on 29.02.2012 and came to Delhi. The Applicant's supposed husband gave triple talaq to the Applicant on 29.01.2014, clearly in order to complete the paper work and sent it by post to her mother's address in Latur, Maharashtra. True typed copy of the Divorce Note – Talaaknama of Jamir Ibrahim Shaikh i.e. the so called

husband of the Applicant dated 20.01.2014 is annexed herewith and marked as **ANNEXURE A-1** [Pages

- 15) It is further submitted that the father and the supposed husband are running a racket of targeting young vulnerable girls and are using them for trafficking, prostitution, forced conversion activities, anti-national activities and Jihad, according to their levels of influence/resistance.

- 16) It is respectfully submitted that the Applicant had given a written complaint against her father and so called husband to S.H.O, P.S Mandir Marg, New Delhi on 16.03.2016 but the S.H.O stated that all allegations made by the Applicant were false on the basis that the place where the Applicant had stated that she was staying was not registered on her name and thus transferred the case to Pune. Mahila Aayog Delhi stated that they don't have jurisdiction to look into this matter as in Delhi nothing as such has been reported. True typed copy of the Complaint dated 16.03.2016 made by the Applicant to the S.H.O., P.S. Mandir Marg, New Delhi is annexed herewith and marked as **ANNEXURE A-2** [Pages

- 17) It is respectfully submitted that the Mahila Aayog, Delhi had sent the Applicant to their member but the Applicant was ill treated by the member and thus on the complaint of the Applicant the member was changed but in the meanwhile the S.H.O had closed the case.
- 18) It is submitted that the Applicant's case is clearly being treated as a case of ordinary crime and abuse and not being entertained on account of frivolous technicalities of jurisdiction and corruption. However, the Applicant has seen and experienced a very detailed account of the systematic and well planned illegal activities of her father, his brother and her so called husband. The Applicant prays this Hon'ble Court to take cognizance of her facts and direct comprehensive investigation by National Investigation Agency (NIA) or Central Bureau of Investigation (CBI), not only for justice to be meted to her and her daughters but also to protect dozens of more vulnerable young girls.
- 19) It is submitted that the Applicant has also been following media reports of similar cases from India and various other countries where young and vulnerable girls are identified and trapped by coercion or fraud marriages,

indoctrinated and used for the purpose of propagating terrorist and anti-national activities of Jihad. The Applicant is also praying that most of these girls and their families are not in a position to seek Redressal or approach the authorities or justice delivery system, therefore, this Hon'ble Court may also direct NIA investigation into the specific cases mentioned in the media reports also.

- 20) These reports make it clear that the *modus operandi* of these anti-national elements is a very well orchestrated and well oiled scheme. It is not a case of isolated, independent and individual instances of crime but rather a motivated scheme of operation. They identify and pick up young impressionable and vulnerable girls/boys of Hindu, Sikh, Christian and from other faiths other than Islam. Some specific individuals of the racket operate as honey traps to entice and entrap young girls in schools and colleges. These young girls are lured into converting to Islam by manipulation. They are then trapped into fake or coerced marriages. They are abused physically, mental ly and psychologically. They are also reported instances of use of Drugs and Hypnosis to brain wash and indoctrinate the victims. Because of the constrains of social structures and societal pressure, the families initially take a hostile

stand against these young girls, which pushes them even further away from their families and into the clutches of extremists. Only after the young girls are ostracized by their families/community and they have no other place or person to turn to, they are slowly indoctrinated into active Jihad by being forced/coerced to participate in anti-national and terrorist activities. Media reports clearly show that Kerala has become a hub of ISIS and Jihadi activities.

- 21) As per a news report by India today dated Sept 4th 2012 - Trivandrum edition : Chief minister Oomen Chandy told the state legislature on June 25th 2012 that 2667 young women were converted into Islam since 2006, this included 2195 Hindu and 492 Christians. This was to respond to a question by KK Latika one of the MLA's. According to the chief minister a total of 7713 people had been converted to Islam during the 2006-2012 period. The same report mentions that one of the converts a christian lady by the name of Cherian was arrested in Kochi for passing 2 sim cards to T Nazir suspected to be a top Lashkar E Tayeba operative suspected of many terrorist acts including the Bangalore Blasts through her boyfriend Noushad who faked a narcotic case to get to

the LET leader in the same jail as suspected by Kerala Police. Xerox copy alongwith true typed copy of the news report published in India Today dated Sept 4th 2012 - Trivandrum edition is annexed herewith and marked as **ANNEXURE A-3** [Pages

- 22) “After Denial, the admission : Love Jihad, a reality in Kerala “ in a news report published by the The Indian Express on October 6th 2017 the Kerala police chief Loknath Behara admitted that love Jihad and Dawa Squads were not the figment of anybody’s imagination, and that “Radicalization through conversion using various means is taking place in the state. We have formed specialised teams to track related developments in a integrated manner”. According to special report filed by the police which was accessed by the newspaper, Love Jihad has been going on in the state for quite some time, with a self styled fundamental group called Dawa squad actively converting youngsters in Kerala into Islam with maximum conversions taking place in Kannur, Kozhikode, Malappuram, Palakkad and Thrissur. Dawa means Proselytising. The report also warns of Dawa was hatching plots to fuel communal tensions in the state. Xerox copy alongwith true typed copy of the news report

published in The Indian Express on October 6th 2017 is annexed herewith and marked as **ANNEXURE A-4**
[Pages

- 23) This is not an isolated phenomenon , Hindustan Times, in their Story “Love Jihad, UK Sikh Girls exploitation worries Takht” published on 28/01/2014 mentions that the Akal Takht, the highest temporal seat of Sikhism has taken a very serious view of reports of Sikh girls, along with Hindu and Christian girls falling victim to Love Jihad - an act that involves charming Pakistani youths attempting to impress, marry and convert non muslim girls to Islam for using them in Jihadi activities. The article sites that there are reports suggesting that some radical islamic groups are behind this movement. Giani Gurbachan singh, presiding over a meeting on this subject at the Akal Takht after the meeting made it clear that the Sikh council of UK had been asked to take what ever steps it considered appropriate to halt this exploitation, including legal measures. The report ends by mentioning that the Love Jihad movement is said to have its roots in Kerala and other southern states where Christian and Hindu girls were being targeted and were a cause of tension in these states. Xerox copy alongwith true typed copy of the news

report published in Hindustan Times, in their Story “Love Jihad, UK Sikh Girls exploitation worries Takht” published on 28/01/2014 is annexed herewith and marked as **ANNEXURE A-5** [Pages

24) The Metro news of UK in their report dated 22 Feb 2007 titled “Hindu Girls Targeted by Extremists” have reported that in the UK, Muslim extremists who try to force Hindu girls to convert to Islam are being targeted in a new police crackdown. And that the recruits are often paid upto GB pounds 5000 for each success are stepping up aggressive conversion tactics, specially around universities. Xerox copy alongwith true typed copy of the news report published in Metro news of UK in their report dated 22 Feb 2007 titled “Hindu Girls Targeted by Extremists” is annexed herewith and marked as **ANNEXURE A-6** [Pages

25) The Times online of UK reported on 03/03/2007 in a story titled “Muslims accused of blackmail to make student girls convert” reports that radical muslims are being accused of blackmailing young hindu and Sikh women into changing their religion in groomed conversations on campus. The men aggressively target vulnerable university students by

using the fear of being dishonoured to force them to convert. Many befriend their victims, then threaten to tell their families that they are in a sexual relationship with a muslim, some teenagers are said to have been drugged and photographed in compromising positions". Xerox copy alongwith true typed copy of the news report published in Times online of UK reported on 03/03/2007 in a story titled "Muslims accused of blackmail to make student girls convert" is annexed herewith and marked as **ANNEXURE A-7** [Pages

- 26) In a news report by NDTV.COM, on 31/8/2017 titled "In Kerala, Love Jihad enquiry what women who converted have testified" the report mentions a 22 year old reconverted victim as saying that as per her affidavits submitted to court, that the organisation involved in her conversion is Sathya Sarini, which runs a residential program for new converts and is also named by another 27 year old women as having coached her how to escape the courts fast, and to handle her parents gimmicks. Activists of SDPI, or Social Democratic Party of India which is the political wing of PFI or popular front of India are also named as facilitators of these conversions. PFI is currently under the scanner for their various activities.

Even Shafin Jehan, the man who supposedly married Akhila or Hadiya is supposed to be a SDPI member and activist. Xerox copy alongwith true typed copy of the news report published in NDTV.COM, on 31/8/2017 titled “In Kerala, Love Jihad enquiry what women who converted have testified” is annexed herewith and marked as **ANNEXURE A-8** [Pages

- 27) Given these various reports from various news sources, it is clear that some antinational organisations are behind these Brain washes and forced conversions, and are actively luring youngsters into radicalisation and routing them to ISIS and other terrorist organizations for their use in terrorist activities. The 21 people supposed to have shifted to ISIS in Afghanistan and in Syria is ample proof of this conspiracy. One can only shudder to think how much damage a radicalised young man or woman could do to unsuspecting citizens, the brutal murder of Prime minister Rajiv Gandhi at the hands of such a brain washed and radicalized woman of LTTE, as well as images and confessions of an Ajmal Kasab are a stark reminder to those of us who may be taking this threat lightly.

28) Similar media reports from across the country are pouring in with FIR's and cases being filed across India citing Love Jihad cases where Muslim men have been changing their identity, luring hapless girls, then forcing them to convert, torturing them, mass raping them and then pressuring them to take part in Anti national activities. All of these need to be properly investigated as they are all following a common pattern and modus operandi - where a heartless strategy of luring vulnerable girls to convert to Islam by feigned love and promises of marriage. But instead of marital bliss, the girls unwittingly trapped in its deceitful web usually winding up in the hands of Muslim fundamental organisations. There are multiple reports coming from across India reporting a similar tactic being used - the Jihad romeos are given cell phones, bikes and fashionable cloths to accomplish their sinister mission. They have two weeks to find a girl of another religion and six months to convert her to Islam. If the girl shows no interest within two weeks, they are to leave her and find another. For every conversion, the men receive a monetary reward - usually Rs. 5 to 7 lakhs; with the money for Love Jihad coming from a variety of organizations, many foreign based. If a recruiter does

marry his convert, he is encouraged to have four children with her. Some believe this capacity to bear offspring is the reason why young women are targeted. With conversion, their reproductive powers are taken away from a competing religion and increase instead the Muslim extremist demographic. The Book Why we left Islam - a compilation of testimonies by former extremist Muslims who left their faith - provides details of how in Egypt Coptic Christian girls were similarly targeted - with money paying for these operations coming from abroad, and all kinds of tricks being used to convert girls. From Outright expressions of love and attending their churches, to trapping them in moral scandals, everything was fair game. In this, the extremists were often helped by young Muslim women who identified likely targets, encouraged the victim in a relationship with the extremist, and would even set up morally compromising situations. This is uncannily similar to how Sumati was brainwashed by her husband, who after getting her pregnant, got her to abort her child six times, abandoned her and cajoled and threatened her to join Jihad. So instead of love, a hatred for the infidel and women is at play, to treat them as sexual objects and toys which are conveniently turned

into radicalised jihadis. The stories of scores of women from around the world who reached Syria and Iraq and joined ISIS are all along similar lines and a pointer to the conspiracy at play.

- 29) Organizations like ISIS have publicly declared a war on India and have published their plans for “Ghazwa e Hind” or takeover of this country and to complete Islamisation of this country on their websites openly, and are actively recruiting innocent victims to carry out their nefarious plans. What ISIS have done in Iraq in Syria in terms of their brutal killings of innocent people which were publicised widely on world media are a stark reminder to us as to what to expect should these terrorists become stronger and more active in our country. Even one radical suicide bomber can kill hundreds of innocent victims, the various suicide attacks by terrorists being reported in news from the world over each day cannot be ignored by our intellengencia under any guise. It’s the duty of the state to examine and investigate any threat to our country - both from within as well as from outside, to guarantee and safeguard our freedoms guaranteed by the constitution, therefore it is the duty of our Govt and its agencies to deeply investigate these disturbing events

and trends to unearth and neutralise any threat to our country and to its social fabric. This court is therefore requested to order an extensive investigation by NIA, R&AW, IB, and others to ensure our safety and security. Truly, no one wants another Mumbai like terror attack.

- 30) In light of the above, it appears that the situation in Kerala seems to be grim - the most number of people joining ISIS from India are so far from Kerala, and given the details now emerging of the state police acknowledging to the issue , and given the scores of similar cases being reported across ASSAM, Haryana, Madhya Pradesh, Uttar Pradesh, Maharashtra, J & K - Laddakh in particular, Tamil Nadu, Karnataka, and many many others, it is an imperative now that our national security agencies like the NIA, IB etc are tasked at the earliest to investigate these incidents, identify culprits, draw out trends and address the issue quickly before any serious damage occurs.

PRAYER

It is, therefore, humbly prayed that this Hon'ble Court may graciously be pleased to:

- (i) allow this application and permit the Applicant viz. Smt. Sumati Aarya to be impleaded as Respondent in SLP (CrI.) No.5777 of 2017 titled as "Shafin Jahan Vs Asokan K.M. & Ors."; and/or
- (ii) pass such further or other order or orders, as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS APPLICANT, AS IN DUTY BOUND, SHALL EVER PRAY.

DRAWN & FILED BY:

DRAWN ON: .10.2017
FILED ON: .10.2017

[GP CAPT KARAN SINGH BHATI]
ADVOCATE FOR THE APPLICANT

IN THE SUPREME COURT OF INDIA
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R/at Hindu Mahasabha Bhawan,
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APPLICATION FOR DIRECTIONS

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- 1) The present is an Application for Directions on behalf of the Applicant in the aforesaid SLP (CrI.) No.5777 of 2017 titled as "Shafin Jahan Vs Asokan K.M. & Ors.".
- 2) The present Application is being filed by the Applicant viz. Sumati Arya, resident of Latur, Maharashtra, daughter of Mr Bhav Rao Ahmadabade and Savita Narsingh Rao

Madan Sure, who was abused and sold off by her own father in the name of fraudulent marriage. She suffered immeasurable physical, mental, psychological and emotional torture since her childhood, throughout her so called marriage and was finally able to find courage to run away for the sake of her two daughters, lest they would have been meted out with the same fate. The Applicant is an unfortunate women, whose father was part of the racket and conspiracy. She saw and experienced her cousin sisters and several other girls/women being abused and tortured by her father as also her so called husband. They forced the Applicant to convert to Islam and tried to get her indoctrinated to join and support the activities of SIMI, ISIS and Dr. Zakir Naik.

- 3) The Applicant learnt about the aforesaid proceedings going on before this Hon'ble Court and the fact that this Hon'ble Court has taken cognizance of fraudulent marriages being perpetrated on young and impressionable girls, solely for the purpose of using, misusing and abusing them in furtherance of anti-national activities of Jihad. The Applicant with her extremely constrained and limited wherewithal has been trying to get the authorities to take cognizance of the gruesome

offences having being committed on her, as also the organized, well orchestrated and motivated scheme, of which her father and so called husband are the chief perpetrators, ruining the lives of dozens of young girls/ women.

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part of the racket to attract and recruit more young targets.

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considered her condition and kept on taking undue advantage of her.

It is pertinent to note here that when Applicant used to study in Dr.D.Y.Patil College, Pune her condition had become very critical because of which she used to collapse several times that very moment in her unconscious state the Applicant's father and his friend i.e. Applicant's supposed husband used to go to her room and rape her and take her nude photographs.

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- 16) It is respectfully submitted that the Applicant had given a written complaint against her father and so called husband to S.H.O, P.S Mandir Marg, New Delhi on 16.03.2016 but the S.H.O stated that all allegations made by the Applicant were false on the basis that the place where the Applicant had stated that she was staying was not registered on her name and thus transferred the case to Pune. Mahila Aayog Delhi stated that they don't have jurisdiction to look into this matter as in Delhi nothing as such has been reported.
- 17) It is respectfully submitted that the Mahila Aayog, Delhi had sent the Applicant to their member but the Applicant was ill treated by the member and thus on the complaint of the Applicant the member was changed but in the meanwhile the S.H.O had closed the case.

- 18) It is submitted that the Applicant's case is clearly being treated as a case of ordinary crime and abuse and not being entertained on account of frivolous technicalities of jurisdiction and corruption. However, the Applicant has seen and experienced a very detailed account of the systematic and well planned illegal activities of her father, his brother and her so called husband. The Applicant prays this Hon'ble Court to direct the Union of India, through Secretary, Ministry of Home Affairs, North Block, Central Secretariat, New Delhi – 110001 to be impleaded as Respondent in SLP (Crl.) No.5777 of 2017 titled as "Shafin Jahan Vs Asokan K.M. & Ors." The Applicant further prays this Hon'ble Court to take cognizance of her facts and direct comprehensive investigation by National Investigation Agency (NIA) or Central Bureau of Investigation (CBI), not only for justice to be meted to her and her daughters but also to protect dozens of more vulnerable young girls.
- 19) It is submitted that the Applicant has also been following media reports of similar cases from India and various other countries where young and vulnerable girls are identified and trapped by coercion or fraud marriages, indoctrinated and used for the purpose of propagating

terrorist and anti-national activities of Jihad. The Applicant is also praying that most of these girls and their families are not in a position to seek Redressal or approach the authorities or justice delivery system, therefore, this Hon'ble Court may also direct NIA investigation into the specific cases mentioned in the media reports also.

- 20) These reports make it clear that the *modus operandi* of these anti-national elements is a very well orchestrated and well oiled scheme. It is not a case of isolated, independent and individual instances of crime but rather a motivated scheme of operation. They identify and pick up young impressionable and vulnerable girls/boys of Hindu, Sikh, Christian and from other faiths other than Islam. Some specific individuals of the racket operate as honey traps to entice and entrap young girls in schools and colleges. These young girls are lured into converting to Islam by manipulation. They are then trapped into fake or coerced marriages. They are abused physically, mental ly and psychologically. They are also reported instances of use of Drugs and Hypnosis to brain wash and indoctrinate the victims. Because of the constrains of social structures and societal pressure, the families initially take a hostile stand against these young girls, which pushes them even

further away from their families and into the clutches of extremists. Only after the young girls are ostracized by their families/community and they have no other place or person to turn to, they are slowly indoctrinated into active Jihad by being forced/coerced to participate in anti-national and terrorist activities. Media reports clearly show that Kerala has become a hub of ISIS and Jihadi activities.

- 21) As per a news report by India today dated Sept 4th 2012 - Trivandrum edition : Chief minister Oomen Chandy told the state legislature on June 25th 2012 that 2667 young women were converted into Islam since 2006, this included 2195 Hindu and 492 Christians. This was to respond to a question by KK Latika one of the MLA's. According to the chief minister a total of 7713 people had been converted to Islam during the 2006-2012 period. The same report mentions that one of the converts a christian lady by the name of Cherian was arrested in Kochi for passing 2 sim cards to T Nazir suspected to be a top Lashkar E Tayeba operative suspected of many terrorist acts including the Bangalore Blasts through her boyfriend Noushad who faked a narcotic case to get to

the LET leader in the same jail as suspected by Kerala Police.

- 22) “After Denial, the admission : Love Jihad, a reality in Kerala “ in a news report published by the The Indian Express on October 6th 2017 the Kerala police chief Loknath Behara admitted that love Jihad and Dawa Squads were not the figment of anybody’s imagination, and that “Radicalization through conversion using various means is taking place in the state. We have formed specialised teams to track related developments in a integrated manner”. According to special report filed by the police which was accessed by the newspaper, Love Jihad has been going on in the state for quite some time, with a self styled fundamental group called Dawa squad actively converting youngsters in Kerala into Islam with maximum conversions taking place in Kannur, Kozhikode, Malappuram, Palakkad and Thrissur. Dawa means Proselytising. The report also warns of Dawa was hatching plots to fuel communal tensions in the state.
- 23) This is not an isolated phenomenon , Hindustan Times, in their Story “Love Jihad, UK Sikh Girls exploitation worries Takht” published on 28/01/2014 mentions that the Akal

Takht, the highest temporal seat of Sikhism has taken a very serious view of reports of Sikh girls, along with Hindu and Christian girls falling victim to Love Jihad - an act that involves charming Pakistani youths attempting to impress, marry and convert non muslim girls to Islam for using them in Jihadi activities. The article sites that there are reports suggesting that some radical islamic groups are behind this movement. Giani Gurbachan singh, presiding over a meeting on this subject at the Akal Takht after the meeting made it clear that the Sikh council of UK had been asked to take what ever steps it considered appropriate to halt this exploitation, including legal measures. The report ends by mentioning that the Love Jihad movement is said to have its roots in Kerala and other southern states where Christian and Hindu girls were being targeted and were a cause of tension in these states.

- 24) The Metro news of UK in their report dated 22 Feb 2007 titled "Hindu Girls Targeted by Extremists" have reported that in the UK, Muslim extremists who try to force Hindu girls to convert to Islam are being targeted in a new police crackdown. And that the recruits are often paid upto GB pounds 5000 for each success are stepping up

aggressive conversion tactics, specially around universities.

- 25) The Times online of UK reported on 03/03/2007 in a story titled “Muslims accused of blackmail to make student girls convert” reports that radical muslims are being accused of blackmailing young hindu and Sikh women into changing their religion in groomed conversations on campus. The men aggressively target vulnerable university students by using the fear of being dishonoured to force them to convert. Many befriend their victims, then threaten to tell their families that they are in a sexual relationship with a muslim, some teenagers are said to have been drugged and photographed in compromising positions”.

- 26) In a news report by NDTV.COM, on 31/8/2017 titled “In Kerala, Love Jihad enquiry what women who converted have testified” the report mentions a 22 year old reconverted victim as saying that as per her affidavits submitted to court, that the organisation involved in her conversion is Sathya Sarini, which runs a residential program for new converts and is also named by another 27 year old women as having coached her how to escape the courts fast, and to handle her parents gimmicks.

Activists of SDPI, or Social Democratic Party of India which is the political wing of PFI or popular front of India are also named as facilitators of these conversions. PFI is currently under the scanner for their various activities. Even Shafin Jehan, the man who supposedly married Akhila or Hadiya is supposed to be a SDPI member and activist.

- 27) Given these various reports from various news sources, it is clear that some antinational organisations are behind these Brain washes and forced conversions, and are actively luring youngsters into radicalisation and routing them to ISIS and other terrorist organizations for their use in terrorist activities. The 21 people supposed to have shifted to ISIS in Afghanistan and in Syria is ample proof of this conspiracy. One can only shudder to think how much damage a radicalised young man or woman could do to unsuspecting citizens, the brutal murder of Prime minister Rajiv Gandhi at the hands of such a brain washed and radicalized woman of LTTE, as well as images and confessions of an Ajmal Kasab are a stark reminder to those of us who may be taking this threat lightly.

28) Similar media reports from across the country are pouring in with FIR's and cases being filed across India citing Love Jihad cases where Muslim men have been changing their identity, luring hapless girls, then forcing them to convert, torturing them, mass raping them and then pressuring them to take part in Anti national activities. All of these need to be properly investigated as they are all following a common pattern and modus operandi - where a heartless strategy of luring vulnerable girls to convert to Islam by feigned love and promises of marriage. But instead of marital bliss, the girls unwittingly trapped in its deceitful web usually winding up in the hands of Muslim fundamental organisations. There are multiple reports coming from across India reporting a similar tactic being used - the Jihad romeos are given cell phones, bikes and fashionable cloths to accomplish their sinister mission. They have two weeks to find a girl of another religion and six months to convert her to Islam. If the girl shows no interest within two weeks, they are to leave her and find another. For every conversion, the men receive a monetary reward - usually Rs. 5 to 7 lakhs; with the money for Love Jihad coming from a variety of organizations, many foreign based. If a recruiter does

marry his convert, he is encouraged to have four children with her. Some believe this capacity to bear offspring is the reason why young women are targeted. With conversion, their reproductive powers are taken away from a competing religion and increase instead the Muslim extremist demographic. The Book Why we left Islam - a compilation of testimonies by former extremist Muslims who left their faith - provides details of how in Egypt Coptic Christian girls were similarly targeted - with money paying for these operations coming from abroad, and all kinds of tricks being used to convert girls. From Outright expressions of love and attending their churches, to trapping them in moral scandals, everything was fair game. In this, the extremists were often helped by young Muslim women who identified likely targets, encouraged the victim in a relationship with the extremist, and would even set up morally compromising situations. This is uncannily similar to how Sumati was brainwashed by her husband, who after getting her pregnant, got her to abort her child six times, abandoned her and cajoled and threatened her to join Jihad. So instead of love, a hatred for the infidel and women is at play, to treat them as sexual objects and toys which are conveniently turned

into radicalised jihadis. The stories of scores of women from around the world who reached Syria and Iraq and joined ISIS are all along similar lines and a pointer to the conspiracy at play.

- 29) Organizations like ISIS have publicly declared a war on India and have published their plans for “Ghazwa e Hind” or takeover of this country and to complete Islamisation of this country on their websites openly, and are actively recruiting innocent victims to carry out their nefarious plans. What ISIS have done in Iraq in Syria in terms of their brutal killings of innocent people which were publicised widely on world media are a stark reminder to us as to what to expect should these terrorists become stronger and more active in our country. Even one radical suicide bomber can kill hundreds of innocent victims, the various suicide attacks by terrorists being reported in news from the world over each day cannot be ignored by our intellengencia under any guise. It’s the duty of the state to examine and investigate any threat to our country - both from within as well as from outside, to guarantee and safeguard our freedoms guaranteed by the constitution, therefore it is the duty of our Govt and its agencies to deeply investigate these disturbing events

and trends to unearth and neutralise any threat to our country and to its social fabric. This court is therefore requested to order an extensive investigation by NIA, R&AW, IB, and others to ensure our safety and security. Truly, no one wants another Mumbai like terror attack.

- 30) In light of the above, it appears that the situation in Kerala seems to be grim - the most number of people joining ISIS from India are so far from Kerala, and given the details now emerging of the state police acknowledging to the issue , and given the scores of similar cases being reported across ASSAM, Haryana, Madhya Pradesh, Uttar Pradesh, Maharashtra, J & K - Laddakh in particular, Tamil Nadu, Karnataka, and many many others, it is an imperative now that our national security agencies like the NIA, IB etc are tasked at the earliest to investigate these incidents, identify culprits, draw out trends and address the issue quickly before any serious damage occurs.

PRAYER

It is, therefore, humbly prayed that this Hon'ble Court may graciously be pleased to:

- (i) allow this application and take cognizance of the facts of the Applicant and direct comprehensive investigation by National Investigation Agency (NIA) or Central Bureau of Investigation (CBI);
- (ii) direct the Union of India, through Secretary, Ministry of Home Affairs, North Block, Central Secretariat, New Delhi – 110001 to be impleaded as Respondent in SLP (Cri.) No.5777 of 2017 titled as “Shafin Jahan Vs Asokan K.M. & Ors.”; and/or
- (ii) pass such further or other order or orders, as this Hon’ble Court may deem fit and proper in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS APPLICANT, AS IN DUTY BOUND, SHALL EVER PRAY.

DRAWN & FILED BY:

DRAWN ON: .10.2017
FILED ON: .10.2017

[GP CAPT KARAN SINGH BHATI]
ADVOCATE FOR THE APPLICANT

IN THE SUPREME COURT OF INDIA
CRIMINAL APPELLATE JURISDICTION

CrI.M.P. No. OF 2017

IN

SLP (CrI.) NO.5777/2017

IN THE MATTER OF:

Shafin Jahan ... Petitioner

VERSUS

Asokan K.M. & Ors. ... Respondents

AND IN THE MATTER OF:

Sumati Aarya ... Applicant

AFFIDAVIT

I, Sumati Aarya, [REDACTED], do hereby
[REDACTED], do hereby
solemnly affirm and declare as under:

1. That I am the Applicant in the above mentioned matter, as such I am well acquainted with the facts and circumstances of the case and hence I am competent to swear and sign this affidavit.
2. That the accompanying Application for Impleadment and Application for Directions have been drafted as per my instructions by my counsel and I have gone through the contents thereof and I understood the same.
3. That the contents of the aforesaid accompanying Applications are true and correct to the best of my knowledge, information and belief, no part of it is false and no material has been concealed therefrom.
4. That the Annexures enclosed are true and correct copies of their respective originals.

VERIFICATION:

Verified at New Delhi on this the day of October, 2017 that the contents of the aforesaid affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.