## FIRST INFORMATION OF SCHOOL SECTION 154 CRIMINAL ROCK DURS CODE AT POLICE STATION

FIRST INFORMATION

Sub-Division: Imphal

District: Imphal West

## FIR No. 745(9)2023 IPS u/s 153-A/200/295/298/500/505(1)(b)/505(2)/120-B IPC.

Date & hour of occurrence: 2nd & 3rd September, 2023

Date and hour when reported	Place of occurrence & distance & direction from Police Station	Date of dispatch from Police station
03/09/2023 at 9:30 pm	Within the jurisdiction of Imphal Police Station	03/09/2023

N.B. - A first information must be authenticated by the signature mark of thumb impression of

informant and	attested by the signature	of the officer recording it.		
Name & residence of informant/ complainant	Name & residence of accused	Brief description of offence with section and property carried off. If any	Steps taken regarding investigation of delay in recording information	Result of the case
Ngangom Sarat Singh of Sagolband Mabudhou Mantri Leikai, Imphal West District, Manipur.  OE- attached  OC/IPS 03/09/2023	1. Seema Guha, C/o Editors Guild of India, A/P- 4/7-A, INS Building, Rafi Marg, New Delhi-110001.  2. Sanjay Kapoor, C/o Editors Guild of India, A/P- 4/7-A, INS Building, Rafi Marg, New Delhi-110001.  3. Bharat Bhushan, C/o Editors Guild of India, A/P- 4/7-A, INS Building, Rafi Marg, New Delhi-110001.  4. The President, Editors Guild of India, C/o Editors Guild of India, A/P - 4/7-A, INS Building, Rafi Marg, New Delhi-110001.	Promoting enmity between different groups, using as true such declaration knowing it to be false, injuring or defiling place of worship with intent to insult the religion of any class, uttering words with deliberate intent to wound the religious feelings of any person, statements conducing to public mischief, statements conducing to public mischief which makes publishes or circulates any statement, rumour or report with intent to cause or likely to cause fear or alarm to the public, statements creating or promoting enmity, hatred or ill-will between classes, defamation with criminal conspiracy  Punishable  / u/s 153- A/200/295/298/500/505(1)(b)/505(2)	investigate th	Singh will pse ne case.
fficer-in-charge	TON.	)/120-B IPC.	-	

IMPHAL POLICE STATION Imphal West Dist., Manipur

Signed: (Shri N. Ingocha Singh, MPS)

Designation : OC/IPS 03/09/2023

Officer-in-charge IMPHAL POLICE STATION Imphal West Dist., Manipur The Officer-in-Charge, Imphal Police Station, Imphal West, Manipur.



Subject:- A Complainant against the under below accused for commission offences punishable under Section 153-A/200/295/298/505/ 505(1), 499/120-B IPC, and bribery.

## Accused :-

- Seema Guha, C/o Editors Guild of India, presently at 4/7-A, INS Building, Rafi Marg. New Delhi-110001.
- Sanjay Kapoor, C/o Editors Guild of India, presently at 4/7-A, INS Building, Rafi Marg, New Delhi-110001.
- Bharat Bhushan, C/o Editors Guild of India, presently at 4/7-A.
   INS Building, Rafi Marg, New Delhi-110001.
- The President, Editors' Guild of India, C/o Editors Guild of India, presently at 4/7-A, INS Building, Rafi Marg, New Delhi-110001.

## Place Occurrence and Dated :-

Report of the fact-finding mission on Media's reportage of the ethnic Violence in Manipur published by the accused No. 4 on 2<sup>nd</sup> September. 2023 on the report submitted by the accused Nos. 1, 2 and 3 was found out by the Complainant on 3<sup>rd</sup> September, 2023.

Sir.

I am a Social Worker and has been working locally to the bring peace and help the people stranded in the different relief camps in the State of Manipur during the volatile situation in the State of Manipur. It has come to my knowledge today i.e. 3<sup>rd</sup> September, 2023 the accused No. 4 has published a report dated 2<sup>nd</sup> September. 2023 in the name and style of "Report of the fact finding mission on Media's reportage of the ethnic Violence in Manipur". It is also stated that the above report was made by the accused Nos. 1, 2 and 3. I am filing the above Complaint as the report made by the accused are false, fabricated, sponsored and the accused has committed the offences

or

After a brief reading of the report, it is found out that a picture at page no. 5 of the report has been shown under the caption "Smoke rises from a kuki house on 5 May,". But the true fact is that the said photo is the office of the forest beat officer at Mata Mualtam Village, Churachandpur Village about 03 Kms East In this regards a FIR has been lodged being FIR No. 52 (05) 2023 CCP-PS, U/s 143/147/427/436/34 IPC, 3 PDPP Act reported by a Kuki Police Officer, namely SI G. Jangkholal Kipgen, i/c, OC/CCP-PS at 12:45 p.m. on 03/05/2023 of (copy enclosed as Annexure-1). On this account only, it is obvious that the report is false, fabricated and a paid news and sponsored by Kuki Militants and its supporters as per the press release dated 26<sup>th</sup> July, 2023 by the Editors Guild of India (EGI). (Copy of the Press Release is enclosed as Annexure-2)

It is further complaint to Your Good Self that in the report stated above at page No. 4, it has been falsely stated to be a fact that one Thounaojam Brinda, who took voluntary retirement from being a police officer and joined politics, filed an affidavit in court stating that the Chief Minister and top police brass in the state forced her to let off a person from whose premises drugs worth Rs. 27 crore has been recovered by her team. The fact finding committee of accused insipte of knowing the fact that the above Thounaojam Brinda has deposed before a competent court on oath that no such incident happened (Copy of the relevant part of the order dated 19.11.2022 passed by Ld. Civil Judge (Sr. Divn.), Imphal East, Manipur in Judl. Misc. Case No. 206 of 2020 Ref: Original Suit No. 39 of 2020 is enclosed as **Annexure-3**). By bringing such a false report of Thounaojam Brinda by the accused and which has also been statements of kuki-zo community to cover up their crime a serious crime mentioned above have been committed by the accused.

I, being a responsible Citizen of India and a God fearing man, am compelled to file the present Complaint against the above accused after having perused above false, fabricated and motivated report dated 2<sup>nd</sup> Sept., 2023 of the EGI and the detail of the fabricated and motivated report dated 2<sup>nd</sup> Sept., 2023 of the EGI and the detail of the false statements made by the accused is refuted paragraph to paragraph as under:-

(i) False allegations of the accused at page No. 2 starting from para 3 on the right side of the report dated 2<sup>nd</sup> Sept., 2023 to page No. 3 (on the left hand side at the top) is reproduced for easy reference as under:-

"....Much before the violence erupted on May 3, Manipur's tribal tensions, especially between the majority Meitei community and the minority Kuki-Chin-Zo community, were already reaching their boiling point. The state government seems to have facilitated the majority's anger against the Kukis through several seemingly partisan statements and policy measures.

For examples, the leadership of the state labelled the entire community of Kuki-Zo tribals as "illegal immigrants" and "foreigners" without any reliable data or evidence. This despite the fact that the decadal census from 190 to 2011 has not shown any unusual growth of the non-Naga (the other minority tribal community) tribal population.

The fact that there was a military coup in Myanmar which led to an inflow of about 40,000 refugees to Mizoram and reportedly about 4,000 to Manipur was used to brand all Kuki-Zo as illegal immigrants. This was presented as pressure on resources but was also a war for political space, with the Meitei leadership of the government using the fear of the outsiders to consolidate its political position.

The true facts are as under:-

(a) There is no question of the State Government facilitating the majority's anger against the Kuki Community through partition statement or policy measures. As rightly stated by the Hon'ble Minister of Forest and Environment on 30<sup>th</sup> April, 2023 at Imphal, the State Govt, has only been doing its constitutional duty to protect and preserve the forests from illegal encroachments and large scale de-forestations in the State of Manipur. (copy of the News paper dated 30<sup>th</sup> April, 2023 is enclosed as **Annexure-4**).

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- (b) Large scale illegal immigrations have been taking place into the State of Manipur from the neighbouring countries i.e. Myanmar, Bangladesh, etc., and the records of the Census of India published in the year 1881, 1901, 1931, 1951, 1961, 1971, 1981, 1991, 2001 and 2011 and collective reading of all these would lead us to the conclusion as per the enclosed **Annexure-5 (colly)** that the total number of growth of population of New Kuki and Mizos from 1881 to 2011 is a whopping 2505,29%.
- (c) That the abnormal population growth in the State of Manipur is also evident from the fact that the Census of the year 2001 has not been finalized for the 9 (nine) Hills Sub-Division of the State due to the abnormal decadal growth of the population of upto 169%.
- (d) That the State of Manipur has already miniscule population of about 28 Lakhs as per the Census of 2011 which is yet to be finalised. However, the State of Manipur has faced the eventuality of the deletion of the ration card beneficiaries of 6,06,813 for failure to link the Aadhaar Cards and Ration Cards and these fact itself is very alarming and it proves the fact that there are various unaccounted population existing in the State of Manipur having illegally come from the neighbouring countries including Myanmar (copy of brief note of Ration Card under NFSA is enclosed as **Annexure-6**).
- (e) That recently the election commission of India has identified 1,33,553 photo similar entry in the electoral roll of the State of Manipur and various steps are been taken to delete the said duplicate voters in the records of the Election Commission of India (copy of the photo similar entry detected by ECI is enclosed as Annexure-7).
- (f) That the Republic of the Union of Myanmar, Ministry of Foreign Affairs has issued Notification dated 15<sup>th</sup> June, 2023, thereby advising the Myanmar National to refrain from indulging from the ethnic based conflicts of the State (meaning State of Manipur) where they are taking refuge (copy of the Notification dated 15<sup>th</sup> June, 2023 of Republic of the Union of Myanmar, Ministry of Foreign Affairs is enclosed as **Annexure-8**).

- (g) That the Head Quarter of Assam Rifles has recently on 23<sup>rd</sup> July, 2023, reported that 718 illegal immigrants from Myanmar entered into Manipur on 22<sup>rd</sup> July, 2023 and 23<sup>rd</sup> July, 2023 alone. Therefore, the illegal immigrants from Myanmar is huge and the same is eating into the population in the State of Manipur from the porous international border of 398 km with Myanmar (copy of the report dated 23<sup>rd</sup> July, 2023 is enclosed as **Annexure-9**).
- (h) That vide letter dated 10<sup>th</sup> July, 2023 the S.P., Churachandpur has admitted that 11 injured Myanmar National were treated in Churachandpur District Hospital for various bullet and explosive injuries (copy of the letter dated 10<sup>th</sup> July, 2023 is enclosed as **Annexure-10**).
- (ii) False allegations of the accused at page No. 3 starting from para 2 on the left hand side of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

".... In addition, without following proper procedure as laid down in the Hills Area Committee Act of 1972, the N. Biren Singh government declared parts of Hills as "reserved" and "protected" forests and "wetland reserves". All land ownership documents within these areas were cancelled and a drive started to evict them in December, 2022.

This led to violent confrontation between the state authorities and the Kuki-Zo community which had been living in these villages. The demolition drive which began in the Kangpokpi district, a Kuki-dominated area, extended by February 2023 to Churachandpur and Tengnoupal districts which also had a preponderance of the Kuki-Zo community.

What is significant is that the ......once again leading the Kuki community to believe that it was being singled out. ....."

The true facts are as under:-

(a) That all these Reserved Forest, Protected Forest and Wet land Reserved were declared and published in the Gazette of Manipur before the year 1990 and

none of these were declared by the State Government led by Shri N. Biren Singh, Therefore, the report dated 2<sup>nd</sup> Sept., 2023 of the fact finding team of the EGI is completely absurd and hopelessly motivated.

(iii) False allegations of the accused at page No. 3 starting from last para on the left hand side upto the right hand side of the 3<sup>rd</sup> para of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

".... In an inexplicable move, on March 10, 2023, the Biren Singh government took a Cabinet decision to withdraw from the tripartite Suspension of Operation (SoO) agreement (a kind of a ceasefire agreement) with the Kuki insurgent groups, Kuki National, the Zomi Revolutionary and the Kuki Revolutionary, with whom the Union government wanted a peaceful negotiation.

Simultaneously, a state government committee headed by the Chief Secretary on April 3, 2023, cancelled all land/property deeds and recognition of villages within the designated reserved and protected forest areas. All this was done without any rehabilitation plan for the evicted tribal population. ....."

The true facts are as under:-

- (a) That it is in the public domain of the State of Manipur that the Cabinet decision dated 10<sup>th</sup> March, 2023 was a policy decision of the State Government as a result of the armed violence committed by the said terrorist organisations in different hill districts of Manipur.
- (b) That the question of removal of AFSPA from any part of the State of Manipur is jointly decided by Ministry of Home, Govt. of India and Govt. of Manipur on the basis of the Law and Order situation. Therefore, it cannot be alleged by the corrupted media/accused to be a partisan move of the State Government.

- (c) That cancellations of recognitions of a villages and property deeds within Protected Forest and Reserved Forest are strictly done as per the law of land. Therefore, the finding of the accused is grossly illegal and absurd.
- (iv) False allegations of the accused at page No. 3 starting from bottom on the right hand side upto page No. 4 of the left hand side of the 2<sup>nd</sup> para of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

".... On April 19 it was revealed that in an unusual order the Manipur High Court had ordered on March 27 that the state government recommends the inclusion of the Meitei community in the Scheduled

This was not appealed by the Biren Singh government immediately even though the order had been issued without hearing the State or the tribal stakeholders. This once again made the tribals angry and raised suspicions about the state government's motives. ......"

The true facts are as under:-

- (a) That the Hon'ble High Court only directed the State Government only to consider the Representation of the private party for inclusion of Meitei/Meetei community in the Scheduled Tribe List and thereafter reply to the Letter dated 29/05/2013 of the Ministry of Tribal Affairs, Govt. of India.
- (b) That the above statement of the accused are false and contemptuous.
- (v) False allegations of the accused at page No. 4 starting from 3 para on the left hand side upto the right hand side of the 3<sup>rd</sup> para of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

"....Yet another layer to the complex issue was Biren Singh's so-called "war on drugs". In this the Kuki-Zos were painted as villains who indulged in illegal poppy cultivation in the Hills. Manipur borders

Myanmar and is a major route for drug smuggling through its bord	der
town of Moreh.	

Civil society activists claim that the annual revenue from the drug business in Manipur is estimated to be to the tune of Rs. 50,000 Crore while the state's annual budget is only about Rs. 30,000 Crore. The implication being that the drug network is extensive and cannot thrive without political support.

The true facts are as under:-

(a) "War on Drug" campaign was launched on 26.06.2018 by BJP led State Government of Manipur and so far the State Government has destroyed more than 15,715.368 acres of poppy cultivation in the State. The data of poppy destruction is reproduced hereinbelow for ease of reference:

DETAIL OF FIR CASES REGISTERED IN C/W THE DESTRUCTION OF POPPY/CANNABIS W.E.F. 20/03/2017 TO 21/06/2023.

Year	No. of Cases registered during the year	Destruction of Poppy (area in acre)	Destruction of Ganja (area in acre)	No. of persons(s) arrested if any
2017	NII.	NIL	NIL	NIL.
2018	44 (including 2 cases of cannabis)	1915	5	NII.
2019	30 (including 1 case of cannabis)	2436	15	NIL
2020	45	2346.5	NIL.	1
2021	83	3431.375	NIL	12
2022	94	3002.893	NIL	45
2023	79	2583.6	NIL	29
Total	375	15,715.368	20	87

(b) That the previous government of State of Manipur under the Congress party only destroyed 1889.3 acres of poppy cultivation from the year 2013 to 2016 (i.e. in 4 years). Whereas the present BJP led Government of State of Manipur has so far i.e. from 2017 to 2023 (i.e. in 6 years) destroyed more than 15,715,368 acres of poppy cultivation in the State. That is more than 9 times the poppy cultivation was destroyed by BJP than it was during the rule of congress party in the State of Manipur.

- (c) The allegations against Office of the Chief Minister for the State of Manipur is baseless. As it is available in public record including court records that neither the Chief Minister nor the Office of the Chief Minister is connected to the accused Lhukhosei Zou. Reference may be drawn to order dated 19.11.2022 by the court of Ld. Civil Judge Senior Division in Judl Misc. Case No. 206/2020 in paragraph 22.
- (d) That the accused may be put into trial for their indept knowledge about the estimated annual revenue of the drug of the poppy business of the State as it look like the accused are well connected with the narco terrorists and their supporters and that the accused are most likely to be sponsored by them for the false, fabricated and motivated report dated 2<sup>nd</sup> Sept., 2023 as published by EGI.
- (vi) False allegations of the accused at page No. 4 starting from last para on the right hand side upto page No. 6 of the left hand side of the 1<sup>st</sup> para of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

"....These complex factors together stoked Meitei-Kuki ethnic tensions till they reached a combustion point on May 3. The All Tribal Student's Union Manipur (the apex body of the state's tribal students) had organised a solidarity rally on that day, against the Meitei demand for ST status in Churachandpur.

As a counter to this, Meiteis blockaded all roads leading to the Hill districts. Rumours in the afternoon of some Meitei miscreants setting fire to the Anglo-Kuki War Centenary Memorial Gate (some reports say only a few tyres were burnt next to the gate) led to the tribal rallyists returning home to rush to the site. This became the spark that ignited violence between the two communities.

Rumours of some Meitei women at Churachandpur Medical College being raped led to 'counter-molestation and rape' of Kuki women, arson and killing of Kukis in the Imphal Valley. The night of May 3 saw the almost total destruction of Kuki-Zo churches, houses and other property in the Meitei dominated areas. This was also accompanied by looting of police armouries in the Imphal valley, imposition of curfew and internet shut down.

Although an attempt was made to suggest that the Assam Rifles was only protecting Kukis later by Meitei radicals, that seems far removed from the reality. Violence continued sporadically thereafter but with a clear geographical division being established between the Meiteis and the Kuki-Zo areas.

The true facts are as under:-

- (a) That the accused are blattering about the false narrative of the Kuki community. Firstly, there is no question of Meitei miscreants setting fire to the Anglo-Kuki War Centenary Memorial Gate at the heart of the Kuki dominated Churachandpur district as no Meitei individual would even dream of going into the strong hold of armed kuki militants in Churachandpur. This theory is hopelessly false and coloured with hallucination by the Kuki community who are the sponsor of the accused.
- (b) Secondly, it is widely circulated in public domain in the State of Manipur that the Ministry of Home, Govt. of India has indicated in cleared terms that there is nothing called Anglo Kuki War as per its reply to Lucipriya Kangujam.
- (vii) False allegations of the accused at page No. 6 starting from 2<sup>nd</sup> para on the left hand side upto page No. 7 of the right hand side of the last para of the report dated 2<sup>nd</sup> Sept., 2023 is reproduced for easy reference as under:-

"....The Central government neither imposed President's Rule in the state nor did it invoke powers under Article 355 to take over the law and order machinery. And yet the Governor issued shoot at sight orders, and the Centre appointed a Security Advisor reporting to the Chief Minister who had proved incompetent to control the violence. Some would say the CM's partisan actions had in fact pushed the state into turmoil.

The true facts are as under:-

- (a) That there is substantial improvement in the overall law and order situation in the State of Manipur with very less number of lost of life and property reported in the last about a month. These could be a result of the collective effort of the State Govt. as well as the Central Govt., wherein maximum effort are being taken by the Chief Minister and Union Home Minister to bring back normalcy in the State of Manipur. The functioning of the State Police and Central para Military Forces are directly supervised by the Security Advisor, namely Kuldiep Singh, Ex-DG CRPF since 4<sup>th</sup> -5<sup>th</sup> May, 2023 and therefore, the allegations of the accused are false and misleading.
- (b) That the allegations of the accused mentioned in the above paragraphs are false and these allegations are intended to alarm and instigate different communities to hate each other and continue and even escalate the violences in different part of the State.
- (c) That the allegation of the accused that the Manipur Police Commando are partisan and they openly sided with the Meitei to raid the Kuki villages in the outskirts of Imphal are completely false and baseless. The said State Police personnel are strictly operating under the supervision of the Security Advisor namely Kuldiep Singh (Ex-DG CRPF) and these allegations are made by the accused to demoralise the State Police force and build up the sense of distrust and suspicion amongst the different communities in the State against the State Police force so as to overthrow the Government duly established by law,
- (d) That it is also a false and baseless allegations of the accused to state that the so called Meitei Leepun and Arambai Tenggol are patronised by Chief

Minister N. Biren Singh. There is absolutely no evidence whatsoever of the Chief Minister patronising the said organisations and these allegations are also directed to create enmity and hatred between different communities and also to instigate different communities to revolt against the State Government duly established by law.

(e) That it is also completely false for the accused to deliberately state that only about 10% of the funds for development for hill areas. Whereas the true fact as per the finding of the Committee of Officers is that about 40% of the developmental funds of State is invested in the Hill Areas of the State. (CDPY ENCLOSED AS ANNEXURE-II).

That all the contents of the aforesaid report dated 2<sup>nd</sup> Sept., 2023 are hopelessly false, baseless and motivated and apparently a funded paid news and the complainant may be allowed to produce more supporting documents as and when available.

You are, therefore, requested to register FIR U/s 153-A/200/295/298/505/505(1), 499/120-B IPC, which is and bribery and punish all the accused as per the law of the land.

Dated/Imphal

The 3rd Sept., 2023.

Yours faithfully,

Na Savat Singk Ngangom Sarat Singh)

San of of Imphal West District, Manipur.

cas an 08 og FIR NO 745(9)20231PS

U/S 153-A/200/295/298/505(1)(6)/505(2)/ 500/120-B/PC

O3/09/2023
Officer-in-charge
IMPHAL POLICE STATION
Imphal West Dist., Manipur