

CHARGE SHEET IN CR.NO. 457/2001 U/s 420, 468, 471, 341, 372, 373 and 120 (B)
IPC OF SANJEEVA REDDY NAGAR P.S., HYDERABAD CITY.

IN THE COURT OF HON'BLE IX METROPOLITAN MAGISTRATE
AT NAMPALLY, HYDERABAD.

1.	District, PS, Year, FIR No.	Hyderabad, S.R.Nagar, 2001, 457
2.	Charge Sheet No.	/2002
3.	Dated	- -2002 2/7
4.	Act	420, 468, 471, 341, 372, 373 and 120 (B) IPC
5.	Type of Final Report	Charge Sheet
6.	F.R. Unoccurred	-
7.	If Charge Sheet Original or Supplementary	Original
8.	Name of the I.O. and Rank	1. Sri G. Prasada Rao, S.I. of Police, S.R. Nagar P.S., dt: 14.6.2001 2. Sri N. Sreeramulu, Inspector of Police, City Zone, C.I.D., Hyderabad, dt: 18.7.2001 3. Sri Md. Ahmed Khan, Inspector of Police, City Zone, C.I.D., Hyderabad, dt: 17.1.2002 4. Sri B. Devi Das, Z.I., CID, Medak 5. Sri Y. Yadagiri, Z.I., CID, Nalgonda. 6. S. Manchar Rao, Dy. Suptd. of Police, C.I.D., Kurnool. 7. T. Bapa Rao, DSP, CID, WPC, Hyderabad
9.	Name of the Complainant	Sri M. Eshwar Rao, S/o Suryanarayana, aged 55 years, Project Director, D.W. & C.W. Agency, Hyderabad.
10.	Details of property seized during the investigation and received upon	List enclosed
11.	Name of the witnesses to be examined	List enclosed.
12.	Particulars of the accused persons in Charge Sheet	A-1. Sr. Teresa Maria Kattikaren, D/o Joseph, 65 yrs., Member, Co- ordinator, TLC Home, Sanathnagar, Hyderabad. A-2. Sr. K. Showreethi, 50 yrs, Head Mistress, St. Theresa's Girls-High School, St. Theresa's Hospital, Sanathnagar, Hyderabad. A-3. Nagothu Rojalu, aged 52 years, Occ: Head Mistress, St. Joseph's Convent, Gajwel, Medak District. A-4. Sister Inamma, D/o Bala Reddy, 45 years, President, Provincial Superior, JMJ Provincialate, 6-3-900, Somajiguda, Hyderabad. A-5. Smt. P. Vijaya kumari, W/o R. Chandrashekar, 42 yrs Accountant, TLC Home, R/o Plot No. 212 HS hills, Praath nagar, Opp: JNTU, Kukatpally, Hyderabad. A-6. T. Vani, W/o Bhaskar Savings Co. Cordinator, TLC Home, R/o Sumithra Nagar, Hyderabad.

		<p>A-7. ✓ N.V. N Narasamma W/o Sita Ram, 28 yrs, Record assistant TLC Home, R/o H. No. D-8, ISI Staff quarters, Sanathnagar Hyderabad.</p> <p>A-8. ✓ L. Sangeetha, D/o L. Krishna Kumar, 24 yrs, Record asst, TLC Home, H. No. 5-1381 Puthli bowli, Hyderabad.</p> <p>A-9. ✓ P. Latha, Cluster Co-ordinator, TLC Home, R/o Sanjay nagar Erragadda, Hyderabad.</p> <p>A-10. ✓ J. Suguna, Cluster Co. Ordinator, TLC Home, R/o Habeeb fathima nagar, Bora Bunda Hyderabad.</p> <p>A-11. ✓ R. Niruata, W/o R. Bhaskara Cahri, Former employee of TLC Home, R/o H. No. 8-4-379/9/1, Avanthi nagar, Hyderabad.</p> <p>A-12. ✓ Padmaja, Former employee of TLC Home, R/o AIDS control ceta4re Koti, Hyderabad.</p> <p>A-13. ✓ Deepa, W/o Joshi K Thomas, C/o NG Joman Academy of HRD, Plot No. 6 Rd no. 3 Journalist colony, Banjara hills, Hyderabad.</p>
13.	Particulars of the accused persons not Charge Sheeted	--
14.	If F.R. is false, indicate action taken or proposed to be taken U/s 182/211 IPC	--
15.	Result of Laboratory Ananalysis	--
16.	Brief facts of the case	

The accused A-1 to A-13 entered into criminal conspiracy i.e., an agreement to do an illegal act of giving adoption of children in overseas and in India for monetary consideration and for making easy money. In pursuance of said criminal conspiracy, various documents i.e., Relinquishment Deeds, Admission Registers, Rejection Forms etc., were prepared knowing them to be false with dishonest intention and by inducing the biological parents with monetary consideration they obtained children for the purpose of overseas and in-country adoption.

They suppressed various facts and prepared Relinquishment Deeds in the names of non-existing persons and places and used such forged and fabricated documents for the purpose of adoption in in-country and inter-country.

Brief facts of the case are that on 14-6-2001 Project Director, District Women & Child Welfare Agency, Hyderabad (PW-1) lodged a complaint stating that the Tender Loving Care Home has been procuring children from neighboring districts but not through the parents who approached to relinquish their children which is a contravention of G.O.Ms.No. 16, W.D.C.W. & D.W. Department, dated: 18.4.2001 under rule 2(1) (7) and rule 8 (A) of the Adoption Regulation, 1980. Hence, a joint raid was conducted by the Departmental officials as well as CARA Officials under the supervision of Dr. Jagannath Patil, Dy. Director, CARA, New Delhi over the

T.L.C. Home on 26.4.2001. It is further stated that discrepancies were noticed in the maintenance of records, cash book and some of the records were not provided even on demand and an amount of Rs.19.23 lakhs has not been accounted for. It is further stated that as per the CARA guidelines, the recognized placement agencies has to put in adequate efforts for finding Indian family for adoption. It would be desirable that a placement agency should place annually more than 50% of total number of children given in adoption with Indian family. But the organization is giving preference for Inter-country adoption stating that the Indian parents may not afford huge amounts which is to be spent on the medical heads etc., which leads to doubt. Finally it is alleged that since the authorities have violated the provisions laid down in the fore said G.O. and procure the children without having any valid license, He requested to register a case and take action as per various laws.

as per memo. 457/2001 in/SS.
Basing on the above complaint, the case was registered by S.I. of Police, PS S.R.Nagar, Hyderabad (PW-79) and took up investigation. ~~and~~ the PW-79 examined the complainant (PW-1) and recorded his statement.

As per the orders of the Addl.Dir.Genl. of Police, C.I.D., A.P., Hyderabad vide C.No. 3656/C-16/CID/2001, dated: 10.7.2001, Sri N. Sriramulu, Inspector of Police, City Zone, C.I.D., Hyderabad (PW-80) has taken-up the investigation of this case from PW-79 on 17.7.2001. During the course of investigation, he has examined and recorded the statements of the witnesses and collected 34 Original and 55 Xerox copies of Relinquishment Deeds (2) one Admission Register (Xerox copy) and (3) Copies of Recognition of State Government and CARA from the Chief Coordinator, T.L.C., Sanathnagar, Hyderabad (A-1) under acknowledgement.

Subsequently the further investigation was taken up by the Deputy Supdt. of Police, CID, Kurnool (PW-84) as per the orders of the Addl.Dir.Genl. of Police, C.I.D., A.P., Hyderabad vide Memo Rc.No. 3656/C-16/CID/2001, dated: 1.2.2002 and investigated into the case with the assistance of Y. Yadagiri, Z.I., CID, Nalgonda (PW-81), B. Devi Das, Z.I., CID, Medak District (PW-83) and Md. Ahmed Khan, Inspector of Police, City Zone, CID, Hyderabad (PW-82). On the event of the transfer of the PW-84, PW-85, taken up the investigation and examined the witnesses and recorded their statements.

Under the provisions of Orphanage and other Charitable Homes Act, 1960, the Government of Andhra Pradesh framed A.P. Orphanage and other Charitable Home rules and issued G.O. Ms. No. 67, dated 6-10-1999 directing all voluntary organizations desiring to maintain or conduct a Home to submit an application for Certificate of recognition from Women and Child welfare department. The Government in G.O. Ms. No. 16 dated 18-4-2001 further directed that the voluntary organizations who are not issued with licenses or recognition by the government even though they are registered under the Societies Registration Act, 1860 shall not procure, detain, adopt children and the G.O. authorized the Director or Project Director, district women and child Development agency to inspect the home and to take such children into their possession. The officials of Women Development and Child Welfare Department i.e., PWs 2, 3, 4 have raided the T.L.C. Home on 26.4.2001

and found discrepancies and observed that the Home is running against the Government Orders issued vide G.O.Ms.No. 16, dated: 18.4.2001.

The St. Theresa's Convent Society was registered ^{as per} under 296/73, dt: 8.5.1973 ^{under} Societies Registration Act, XXII, 1860. The registrar of Societies (PW-75) furnished the registration details and names of the directors of the society ^{with reference to} 1999 to 2000; ^{And} further stated that as per the office record no separate registration was made in respect of TLC home and as per ^{the} clause ^{of} Memorandum furnished by the St. Theresa's Convent Society, the Society can undertake the adoption job.

The TLC home has been procuring ^{the} children since ^{the year} 1996 with a sole purpose of giving majority of the children in inter-country adoption for huge monetary considerations. As per ^{the} CARA guidelines, they did not place the children ⁱⁿ in-country adoption and they did not inform the prospective in-country adoptive parents ^{of} availability of Relinquished children, though they maintained the register of prospective in-country adoptive parents to enable them to choose the children for adoption.

The details of children received and given in-country adoption and inter-country adoption by TLC Home are as follows as per the Admission Register maintained by the accused in T.L.C. Home ^{and as follows}:

Year	TOTAL ADMISSION	NATIONAL	INTER NATIONAL	REMARKS
1998	95	31	53	9 Expired 1 not proposed, 1 Gone back
1999	136	48	72	8 Expired, 1 Gone back, 7 in the crèche
2000	189	68	25	34 Expired, 4 Gone back 58 in the crèche
2001	16	3	-	1 Gone back, 12 in the crèche
TOTAL	436	150	150	

The managers (PWs 73 & 74) of South Indian bank, and Punjab National bank, Hyderabad have furnished the data of money transaction of the TLC Home. On perusal of ^{the} said data and the inspection report of the Auditor (PW-76), the TLC Home has ^{been} processing inter-country adoptions through the agencies namely Children Home Society of Minnesota, 2230, COMO, Avenue, St. Pal, Minnesota, USA, Adoption Service Information Agency, I.N.C., 7720, Alaska, Washington DC and International Families Inc., 5. Tomas Circle, NW Washigton DC etc., and sending the children mostly to USA. The amounts received for the children are entered into FCRA Account No.012290026 maintained in the South Indian Bank, Secunderabad vide Ac.No. 1074 and local amount vide SB account No.19446 of Punjab National bank and those amounts were also entered in the cash book maintained by the Institution. The receipts of amounts for inter-country and in-country adoptions are as under:

INTERNATIONAL NATIONAL

1998-1999	1,08,06,311.33	9,77,113.00
1999-2000	93,82,366.00	15,93,274.06
2000-2001	1,31,59,138.00	30,07,142.00
TOTAL	3,33,47,815.33	55,77,549.00

The Auditor (PW-76) after inspecting the Cash Book has opined that huge amount was diverted as building fund. In this regard, in reply to the Letter, dated: 17.4.2002 of I.O., the Chief Coordinator of TLC Home (A-1) has informed that they did not maintain any register for building fund. As per the CARA guidelines (Para 4.38) the agency should ~~have~~ receive not exceeding RS. 6,000/- for processing the documents and not more than Rs 78 per day per child towards maintenance charges of child and these amounts were enhanced to Rs. 10,000/- and to 100/-. On perusal of the above data of funds received by the T.L.C. home, they have collected an average Rs.2,22,318/- and Rs. 37,183/- per each child from the adoptive parents of inter-country and in-country ^{adoptions} respectively in the name of processing charges and building funds etc. The amounts collected by the accused (A-1) per child is beyond the limits of prescribed charges authorized by the CARA.

During the course of investigation, 34 original and 49 Xerox copies of Relinquishment deeds were collected from A-1. During the investigation, ^{on} verified ^{into} the genuineness of original and Xerox copies of Relinquishment Deeds, ~~and~~ it was found that the following named biological parents are not the residents of their respective villages/thandas as mentioned in the Relinquishment Deeds:

Sl. No.	Name of the Baby in the Relinquishment Deed	Name of the biological parents in the Relinquishment Deed.	Names of the witnesses to the Relinquishment of the Baby other than employees of TLC.	Address mentioned in the deed of biological parents
ORIGINAL RELINQUISHMENT DEEDS				
1.	Aradhana	Patula (Father) Dozy (Mother)	Rakiya (Brother of Patula) Bhaskar, Plot No.33, Madhura Nagar	Kalva Hussaina puram village, Kumool District.
2.	Diya	Vijaya (Unwed mother)	Bhaskar, Panjagutta, Hyd.	Bandla Bazar, Guntur
3.	Evelyni	Varalakshmi (Unwed mother)	Nirmala (Aunt of Varalakshmi)	Guntur
4.	Sindhuja	Chenchu Lakshmi (Unwed mother)	Sakri (Aunt of Chenchulakshmi) Jagan Baroda, Hyd.	Pedda Kakani, Guntur Dist.
5.	Kalya	Fantal (Father) Neela (Mother)	Shanathi (Sister of Neela)	Santoshnagar Madannapet
6.	Anil	Nazia (M)	B. Pasha (M/of Nazia) Srinu, 8-2-135, Panjagutta	Banajara Hills, Hyd.
7.	Jyothika	Laskar (F) Bicky (M)	Balu (Friend) Padma (Sister of Bicky), Srinu, 8-2-135, Panjagutta	Ashoknagar, Adilabad.
8.	Marina	Surya (F) Suritha (M)	Sarada (Aunt of Suritha)	Khanmam
9.	Drusya	Janaki (M)	Kanchan, R/o Sriram Nagar, Aruna, Jagadgiritutta	Almaspura Karimnagar.

10	Olileye	Haria (F) Laxmi (M)	Bhaskar, R/o Plot No.33, Madhura Nagar, Hyd. Krishna, brother of Hari	Nirmal Adilabad district.
11	Chaya	Kotaiah (F) Mayoni (M)	G. Ramulu (Uncle of Kotaiiah) P. Lalli, Sriramnagar, Hyd.	Saidabad
12	Udrutha	Rajasekhar (F) Bhagya Lakshmi (M)	C.V. Bhaskar Rao, Panjagutta	Kachiguda, Hyd.
13	Sucharitaha & Sricharitha	Ramulu (F) Shanthi (M)	Balaraj (Uncle to Ramulu) Rambabu (Friend to Ramulu)	Saidabad.
14	Lavanya	Ms.Chukkali (W)	Deepa	Achampet, MBNR Dist
15	Richd	Kaliya (F) Masru (M)	M.S. Naik Pandu	Michugandi
16	Miya	Jagganna (F) Sridevi (M)	Shanti	Achampet
17	Princy	Lakshmaiah (F) Kasala (M)	Vimala Vijay	Mahaboobnagar
18	Kalyani	Padma (M)	--	Mahaboobnagar
19	Lissa	Toya (F) Devi (M)	Ponni, Sister of Toya Bhaskar	Nagarkurnool
20	Geetha	Gopa (F) Sukli (M)	Parvathi (Sister of Sukli)	Gandhi Nagar Nalgonda
21	Jane	Ramu (F) Lali (M)	Narsimhulu (Brother of Ramu)	Sansthan Naraynapuram, Choutuppal, Nalgonda Dt.
22	Anfal	Munia (F) Mounica (M)	Singature	Ragadapa Thanda, Sagar Road, Miryalaguda
23	Sukanya	Shanti (Unwed mother)	Suja (Aunt of Shanti) Vinay Kumar, Rahamathnagar	Suryapet
24	Nancy	Dharma (F) Sulochana (M)	--	Devarakonda
25	Sharnya	Maria (F) Kanuli (M)	Seenu, 8-2-135, Panjagutta, Hyd.	Sagar

XEROX OF RELINQUISHMENT DEEDS

26	Ganga	Ramloo (F) Buzzi (M)	Chandranna (Brother of Ramuloo) Prasanna	Achampet, Ragaguntlapet
27	Sherian	Mallaiiah (F) Gowri (M)	--	Mahaboob Nagar
29	Premvada	Krishna (F) Roopia (M)	Gopi (Brother of Krishna) Aunt of Roopia	Kalwakurthy Mahaboob Nagar
31	Manjusha	Bandari (F) Komli (M)	Kondaiah (Uncle of Bandari) B Rani, H.No. 1157, Fathenagar, Hyd.	Palamoor Kalwakurthy Nalgonda
32	Alcena	Tariya (F) Kosali (M)	Kosali (Grand mother) Rajanna (brother to Kosali)	Palamoor Kalwakurthy
33	Shakti	Baliya (F) Yellamma (M)	Laxmi V.Vani, H.No. 1056, Sanathnagar	Achampet
34	h	Raggaiiah (F)	Bhaskar Rao	Golconda Fort, Hyd.

35	Anup	Laxmi (M) Nanavathi Badraiah (F) Somali (M)	Panjagutta, Hyd. Hymavathi, R.P. Colony Kanth, SC B Nagar	Sunnipenta Srisaibam Kurnool Dt.
36	Rajeeni	Mangaiah (F) Munemma (M)	Raju (Uncle of Baby mother) Signature, 4-541 Sanathnagar, Hyd.	Veldurthy Guntur Dt.
37	Haseena	Bhanu (Unwed mother)	Only signature not address	Guntur
38	Bizili	Kamalamma (Unwed mother)	Ramaiah (Father of Kamalamma) Srikanth Srirammagar	Vijayawada
39	Kiranmai	Sarala (Unwed mother)	Sharada (Mother of Sarala) Lalitha (Aunt of Sarala)	Balanagar
40	Shreya	Hari (F) Jamika (M)	Krishna (Brother of Hari) Bhaskar, Plot No.33 Madhuranagar	B.N.Reddy Nagar, RR dt.
41	Bloosum	Balaiah (F) Sumathi (M)	Saritha, Sanjaypuri Inna, Sanjaypuri	Saidabad.
42	Lathika	Borgia (F) Laxmi (M)	Singnature	Rajanaka Thanda, Suryapet
43	Nandita	Chandru (F) Kaika (M)	Karla (Aunt of Kaika) Sony (Grand mother of Chandru)	Miryalaguda
44	Mythili	Kasna (F) Shanti (M)	C.V. Bhaskar Rao, 8- 2-136/1, Panjagutta, Hyd.	Miryalaguda of Nalgonda Dist.
45	Purnima	Baji (Unwed mother)	Rajamma (Aunt of Baji) V. Vani Kumari, 371, MGHI, Kukatpally, Hyd.	Sagar
46	Sachin	Bhaskar (F) Heerabai (M)	Signature of Jaya	Chandampet
47	Amelia	Seenu (F) Chinni (M)	Krishna, D.No.16, Kalyan Nagar Brother of Chinni	Kanagal
48	Adithi	Panthula(F) Mangi(M)	Moriya(Brother of Panthulu) Raju, Sanathnagar	Mallepally, Nalgonda dist.
49	Suguna	Bicha(F) Bodi(M)	C.V. Bhaskar Rao, 8-2-136/1, Panja gutta, Hyderabad	Amangal Thanda, Miryalaguda
50	Jaquiline	Venkatesh(F) Sunitha(M)	C.V. Bhaskar Rao, 8-2-136/1, Panjagutta, Hyderabad.	Vinjamoor, Chintapally mandal Nalgonda
51	Sithara	Mani(F) Valu(M)	C.V. Bhaskar Rao, 8-2-136/1, Panjagutta, Hyderabad	Cnithugunda, Mallepally mandal, Nalgonda district.
52	Sasikala & Srikala	Damala(F) Gancey(m)	Raja(brother)	Marathpally thanda, Chinthapally, Nalgonda district.
53	Jersy	Sangara(F) Shanthi(m)	Ganesh	Haliya mandal, Miryalgauda
54	Vismaya	Keshava(f) Dhurami(m)	C.V. Bhaskar Rao, 8-2-136/1, Panjagutta, Hyderabad	Gasyathanda, Chinthapally, Hyderabad.

PWs 5 to 13, 15 to 25, 27 to 38, 40 to 45, 46, 48, 49, 50, 51 to 61 have stated that the named biological parents mentioned in the above relinquishment deeds are not in existence in the thandas/villages.

Investigation also disclosed that the following named Thandas/Villages ^{A-1} were not in existence as mentioned in the relinquishment deeds:

Sl. No.	Name of the Baby	Name of the biological parent	Name of the village of biological parent
1.	Sanjana	Dhkaya(f) Jummu(m)	Jyngundam, Gurrampod Mandal, Nalgonda
2.	Tarun	Laxman(f) (Laxmi(m))	Bodagunda thanda of Miryalaguda
3.	Sweety	Saly(Unwed mother)	Chandanapally, Devarakonda, Nalgonda District.
4.	Pravallika	Laxmajah(f). Komali(m)	Chandampally, Devarakonda, Nalgonda District
5.	Rhea	Rakayu(f) Ramali(m)	Korathanda, Sagar
6.	Sofia	Chandu(f) Gomli(m)	Thomas Peter Chintana Gutta thanda, Mahaboobnagar
7.	Sridevi	Thirupathi(f) Bichi(m)	Nakagundi, Mahaboobnagar district.

PWs 14, 26, 47 to 48 and 50 have stated that no Village/Thanda mentioned in the deeds as above is existing in Mandal/District.

All the accused A-1 to A-13 entered into criminal conspiracy to fabricate relinquishment deeds. A-5 to A-13 are the employees of T.L.C. Home, who ^{home} acted as witnesses to the fake and fabricated relinquishment deeds even though the biological parents named were not in existence. A-2 is the H.M. of St. Theresa's Girls High School, Sanathnagar, A-3 is the H.M. of St. Joseph's Convent, Gajwel. They attested the relinquishment deeds knowing fully well that the biological parents are not in existence and the persons who signed as biological parents are fictitious. Details of the ^{deeds} attested by A-2 and A-3 are as under:

Attesters

The details of the attestors who attested on the relinquishment deeds.	Name of the baby whose relinquishment deed was attested by the accused and on verification the named biological parents/parents were not in existence
A-2 Sr.K. Showreelu, H.M. of St. Theresa's Girls High School	1. Oliviya, 2. Jyothika 3. Sharanya, 4. Geetha, 5. Tharun, 6. Pravallika, 7. Reha, 8. Sukanya, 9. Dushya, 10. Marina, 11. Aradhana, 12. Evelyan, 13. Diya, 14. Sindhuja, 15. Kyla, 16. Chaya, 17. Sricharitha and Sucharitha, 18. Lissa, 19. Richa, 20. Mia, 21. Princy, 22. Sridevi, 23. Priyamvada, 24. Ganga, 25. Aleena, 26. Kiranmayee, 27. Shreya, 28. Bloosum, 29. Bijili, 30. Rajeevini, 31. Anoop, 32. Adithi, 33. Amelia, 34. Poornima, 35. Nanditha, 36. Manjusha.
A-3 Sr. Rojali, H.M. of St. Joseph Convent.	1. Anfal, 2. Sanjana, 3. Nancy, 4. Udrutha, 5. Lavanya, 6. Sofia, 7. Vismaya, 8. Satish, 9. Haseena, 10. Mydhili, 11.

Details of accused who signed as witnesses in the fake and fabricated

Relinquishment Deeds:

Name of the employee who signed as witness on the relinquishment deed.	Details of the relinquishment deeds wherein the named biological parents and places mentioned are not in existence.
A-5 Smt. P. Vijaya Kumari, Accountant of TLC Home	Baby: Jessy, Biological parents: Sangara(F) and Swetha (M) of Haiya of Nalgonda Dist.
A-6 T. Vani, Savings Co-ordinator of TLC Home	1. Baby: Mydhili Biological parents: Kasana and Santhi of Miryalaguda
A-7 N.V. Narasamma, Record Asst. of TLC Home	1. Baby: Mydhili Biological Parents: Kasana and Santhi of Miryalaguda
A-8 L. Sangeetha, Record Asst. of TLC Home	1. Baby: Udrutha Biological Parents: Raja Skekar (F) and Bhagya Laxmi (M) of Kachiguda, Hyderabad. 2. Baby: Lavanya Biological Parents: Chukali (M) of Ethapalli Thanda, Achampet, MBNR Dist. 3. Baby: Anfal Biological Parents: Muniya (F) and Meenika (M) of Ragadapa Thanda of Miryalaguda
A-9 P. Latha, Cluster Co-ordinator, TLC Home, Hyderabad.	1. Baby: Mydhili Biological Parents: Kasana and Santhi of Miryalaguda 2. Baby: Haseena Biological Parents: Bhanu (M) of Guntur 3. Baby: Suguna Biological Parents: Bicha (F) and Bodi (M) of Amangal Thanda of Miryalaguda
A-10 J. Suguna, Cluster Co-ordinator, TLC Home	1. Baby: Vismaya Biological Parents: Keshava (F) and Dhrami (M) of Ghusya Thanda of Chintapally 2. Baby: Sitara Biological Parents: Mani (F) and Vali (M) of Chitugunda of Nalgonda Dist.
A-11 R. Nirrnala, Former employee of TLC Home	Baby: Sathish Biological Parents: Rangaiah (F) and Laxmi (M) of Golkonda, Hyderabad.
A-12 Padmaja, Former employee of TLC Home	1. Baby : Sachin Biological Parents: Bhaskar (F) and Heerabai (M) of Chandampet village of Nalgonda dist.
A-13 Deepa, of NG Joman Academy of HRD	Baby: Lavanya Biological Parents: Chukali (M) of Ethapalli Thanda of Achampet of MBNR

CARA rule 4.21 reads as "in case of surrendered children after 2 months for the consideration the placement agencies shall make all efforts within 45 days to place the children in in-country adoption." In the following cases the TLC Home commenced the process of transferring the child by adoption much before the expiry of 60 + 45 days time in a hurry to send the children in inter-country adoption. In some instances, the accused did not wait even till the expiry of the 60 days to enable the biological parents to reconcile whether they want to take back their child or not.

Sl. No.	Name of the child	Date of relinquishment	Date of proposal requesting for VCA clearance	Period of commencement of Adoption process (days)
1.	Anusha	10.2.2000	17.4.2000	55-65
2.	Rajeevi	25.8.2000	20.11.2000	85
3.	Avanthi	20.8.2000	20.11.2000	90
4.	Priyamvada	30.8.2000	20.11.2000	80
5.	Nanditha	25.7.2000	10.9.2000	45

Further investigation revealed that the accused prepared fake relinquishment deeds by purchasing the stamp papers subsequent to the relinquishment of babies and the details as follows:

Sl. No.	Name of the child	Date of purchase of stamp paper	Date of relinquishment	Date of admission in TLC Home	R.D. is anti-dated for the period (days)
1.	Namratha	28.6.2000	14.6.2000	14.6.2000	12
2.	Hima Bindu	28.6.2000	11.6.2000	11.6.2000	17
3.	Anusha	28.2.2000	10.2.2000	10.2.2000	18

The accused purchased large number of non-judicial stamp papers of Rs.10/- denomination through a stamp vendor (PW-67) and kept them ready to fill them up to their convenience after procuring the children from Thandas/Villages by paying them a sum of amount. They fabricated the relinquished deeds at TLC Home mentioning the names and places of Relinquished parents/places of residence of their choice.

The rejection forms collected from PW-2, the Asst. Director, WID & CW Department in respect of Sri M. Prabhakar Rao and his wife Smt. Eshwari Devi of Chinna Obula, Gopalapur Village, Manthani, Kurnool District whose signature and address were found on the rejection forms for seeing and rejection of the babies Malavika, Ranuka and Kanchana was verified and the A.O. Collectorate, Kurnool (PW-65) has informed through his letter that the said named village is not in existence in Kurnool district. Basing on the rejection forms the accused has applied for the NOC from VACA and CARA for sending the children in inter-country adoption.

As per the CARA guidelines 4.13 to 4.18 the responsibility for the authenticity of the surrender documents would be on the agency i.e., TLC Home.

PWs 62 and 63 stated that they have given their female child for adoption to TLC Home through a mediator (PW-64) and they were paid Rs.500/- by A-1 (This is the subject matter of the baby Janaki) and PW-64 himself also given his female child to the TLC Home and he was paid Rs.1100/- by A-1.

PWs 68 to 70 have stated that they have conducted a study on relinquishment of

Lured the poor lambadas with money, purchased the babies by engaging the mediators and most of them were sent for inter-country adoptions in stead of placing them in inter-country adoption for monetary consideration with an intention to earn cash and huge money, which is nothing but unlawful purpose.

PW-71 who is the Retired Hon'ble High Court Judge of Punjab and Haryana has stated that he has visited the USA in the year 1997 and found one of the adoptive boys suffering from mal-nutrition and the foreign agencies were non-cooperative to know the condition of adoptive children.

Thus the investigation disclosed that the accused A-1 to A-13 secured 436 babies mostly from Lambada Thandas from 1998 to 2001 by luring the poor and innocent biological parents through mediators, paying them monetary considerations and prepared fake and fabricated relinquishment deeds by mentioning fictitious names of the biological Parents and fictitious addresses. In cases where the relinquishment documents are found forged in the names of fictitious persons, the accused failed to account for the custody of those children from proper custody and it leads to the conclusion that those children were unauthorisedly and illegally kidnapped from lawful custody. Even without giving 60 days time to the biological parents to reconcile their decision and without keeping the children for in-country adoption for 45 days and by fabricating the rejection forms, they secured NOCs from VACA and CARA and gave away large number of children in inter-country adoption by accepting Rs.2,22,318/- on an average for each of the inter-country adoptive child and during this process they did not maintain the registers and caused disappearance of many registers and cheated the Government, public and biological parents.

Thus A-1 to A-13 have committed offences punishable U/s 420, 468, 471, 341, 363, 372, 373 and 120(B) IPC.

Hence the Charge.

Sd/-
(T.BABA RAO)
Dy. Superintendent of Police,
W.P.C., C.I.D., Hyderabad.

MEMO OF EVIDENCE IN CR.NO. 457/2001 U/s 420, 468, 471, 341, 372, 373 and
120 (B) IPC OF P.S., SANJEEVA REDDY NAGAR, HYDERABAD CITY

1.	Sri M. Eshwar Rao, S/o Suryanarayana, aged 55 years, Project Director, D.W. & C.W. Agency, Hyderabad.	He is the complainant who filed the FIR and he speaks that as per orders of the Director, WD&CW department he has filed the complaint in Sanjeevareddy Nagar PS basing on the enquiry report of the members of CARA and Child welfare department, AP who raided on the TLC home, Sarathnagar, Hyderabad.
2.	Smt. Y. Sailaja, W/o Siva Prasad, aged 38 years, C.D.P.O., DW & CW Agency, Hyderabad, R/o Plot No. 11-24-4-13-1, Vishnupuri Extension, Malkajgiri, Secunderabad.	She is the Assistant Director, Adoption cell, WD&CW department, Hyderabad and speaks that on 26.4.2001, she accompanied with CARA Officials for a joint raid over TLC Home, verification of documents, records etc. facts.
3.	Smt. K. Shyam Sundari, W/o Anjaneyulu, aged 41 years, Project Officer, DW & CW Agency, Hyderabad, Plot No. 190, Kamadhenu Apts., Motinagar, Hyderabad.	She is also a member of joint raid party. She accompanied along with the officials of CARA for a joint raid over TLC Home on 26.4.2001 and speaks about the verification of documents, records etc.
4.	Sri K. Obulapathi, S/o Late K. Yellappa, aged 50 years, A.O., D.W. & C.W. Agency, Hyderabad, R/o H.No. 23-5-577, Lal Darwaza, Hyderabad.	He also followed the CARA officials for a joint raid over TLC Home on 26.4.2001 and speaks about the inspection of records, documents and about his findings
5.	Sri Mudavath Chandra Naik, S/o Mansingh Naik, aged 45 years, Caste Elder, Lambada Colony, Sunnipenta, Srirailam Project, Kurnool District	He speaks about the non existence of the named biological parents Nanavathi Badraiah and his wife Somali of baby Anup of Srisailam Sunnipenta
6.	Sri A. Pullamraju, S/o A. Ramachandraiah, aged 45 years, Asst. Gram Panchayat Officer, Sunnipenta, Kurnool District.	He speaks about the non existence of the named biological parents Nanavathi Badraiah and his wife Somali of baby Anup of Srisailam Sunnipenta and issued certificate.
7.	Sri Nanavathi Pullanna Naik, S/o Thole Naik, aged 48 years, Caste Elder, R/o Gudem Bai Thanda, Kalva Hussainapuram, Kurnool District.	He speaks about the non existence of the named biological parents Patula and his wife Doji of baby Ardhana of Kalava Hussainapuram, Kurnool district.
8.	Sri K. Gurumurthy, S/o K. Veeranna, aged 40 years, Panchayat Secretary, R/o Kalva Hussainipuram, Kurnool Dist	He speaks about the non existence of the named biological parents Patula and his wife Doji of baby Ardhana of Kalava Hussainapuram, Kurnool district and issued certificate.
9.	Moparthi Prasad, s/o M. Bhushanum, 48 yrs, Panchayath Secy. R/o Peddakakani Guntur district	He speaks about the non existence of the named biological unwedded mother Chancher Laxmi R/o Pedda Kakani, Guntur district of baby Sinduja in the village and issued certificate.
10.	Sri Nerulla Madhava Rao, S/o Balakeshavulu Gupta, aged 50 years, R/o Ward No.42, Councillor, R.Agraharam, Guntur Town.	He speaks about the non existence of the named biological unwedded mother Vijaya of baby Diya of Guntur Town and issued non existence certificate.
11.	Sri B. Balakrishna, aged 40 years, MRO, Guntur Town.	He speaks about the non existence of the named biological unwedded mother Bharati of baby Haseena of Guntur Town and issued non existence certificate.
12.	C. Venkateshwer Rao, S/o C. Subbsa Rao. 52 yrs, Village Secretary, Veldurthi village Guntur district.	He speaks about the non existence of the named biological parents Mangaiiah and his wife Munemma of baby Rajeevi of Veldurthi village.
13.	M.V. Sathyanarayana, IAS, Commissioner Municipal Corporation, Vijayawada	He speaks about the non existence of the named biological mother Kamalanamma of Sriramnagar, Vijayawada city of baby Biji.

		and issued non existence certificate
14.	B.R. Meena, IAS, Collector, Krishana District	He issued non existence certificate in respect of Veerapalam thanda of Krishna District regarding the named biological parents Srini 35 yrs and his wife Mangamma, 32 yrs of baby Thanish of Veerapalem thanda.
15.	Sri G. Narender, S/o Narsimha, aged 40 years, Occ: Business, R/o B-14/6, SRT, MCH Colony, Indira Nagar, Khairatabad, Hyd.:	He speaks about the non existence of the named biological parents Kotaiah and his wife Mayoni, of baby Chaya in Saifabad locality.
16.	Sri C. Krishna Yadav, S/o Sathaiah Yadav, aged 40 years, MCH Corporator of Khairatabad, R/o H.No. 6-1-585/A, Khairatabad, Hyd	He speaks about the non existence of the named biological parents Kotaiah and his wife Mayoni, R/o Saifabad of Baby Chaya.
17.	Sri A. Raghupathi, S/o Gottaiah, aged 29 years, Occ: Social Worker, R/o H.No. 17-1-383/A/16/127/1, Neeelam Rajasekhar Reddy Nagar, Saidabad, Hyd	He speaks about the non existence of the named named biological parents Ramulu and his wife Shanthi, r/o Saidabad of babies Sricharitha and Sucharitha and Balaiah and his wife Sumathi of baby Blossum of Saidabad Colony.
18.	Sri Subhash Chander Jee, S/o Balaji, aged about 48 years, Occ: MCH Corporator, Saidabad, Hyd, R/o H.No. 16-1-289, Poosala Basti, Saidabad, Hyd	He speaks about the non existence of the named biological parents Ramulu and his wife Santhi, N/o Saidabad of Babies Sricharita and Sucharita.
19.	Sri Mohd. Akbar Khan, S/o Mohd. Azeem Khan, aged 42 years, Occ: TDP Worker, R/o 9-11-20/A, Moti Darwaza, Golconda Fort, Hyd	He speaks about the non existence of the named biological parents Rangaiah and his wife Mrs. Lakshmi, R/o Golconda Fort Hyderabad of Baby Satish.
20.	Sri Mohd. Ahmed, S/o Mohd. Yousuf, aged about 48 years, Occ: MCH Corporator of Golconda Ward, Hyd., R/o 9-3-125/252/B, Md.Lines, Golconda Fort, Hyd	He speaks about the non existence of the named biological parents Raggaiyah and his wife Mrs. Lakshmi, R/o Golconda Fort Hyderabad of Baby Satish.
21.	Sri G. Krishna, S/o Ramulu, aged 26 years, Occ: TV Mechanic, R/o H.No. 3-1-608, Nimboli Adda, Kachiguda, Hyd	He speaks about the non existence of the named biological parents Rajasekhar and his wife Y. Bhagya Lakshmi, R/o Kachiguda of Baby Vudratha.
22.	Sri Durga Singh, S/o Shambhu Singh, aged about 50 years, MCH Corporator, Kachiguda, R/ Hyderabad	He speaks about the non existence of the named biological parents Rajasekhar and his wife Y. Bhagya Lakshmi, R/o Kachiguda of Baby Vudratha.
23.	Sri Yadaiah, aged about 40 years, Mandal Parishad Development Officer, Mahaboobnagar	He speaks about the non-existence of the named biological parents Smt. Masru, w/o Kalia, aged 27 yrs. of baby Riched, n/o Michugandi, MBNR Dist., (2) Smt. Kamala, W/o Lakshmaiah, aged 28 yrs. of baby Prince, r/o MBNR Dist., (3) Ms. Padma, aged 25 yrs. Unmarried of baby Kalyani, R/o MBNR, (4) Smt. Gouri, W/o Malliah, aged 38 yrs. of baby Sheren, r/o MBNR dist., (5) Smt. Gomla, W/o Chandu of baby Sofia, n/o Thomas Peter Chintanagutta Thanda, MBNR Dist. and (6) Smt. Bitchi, W/o Tirupathi, aged 28 yrs. of baby Sridevi, n/o Nakagundi of MBNR district and issued non-existence certificates.
24.	Sri P. Jaya Prakash Rao, MRO, Kalwakurthi, Mahaboobnagar Dist	He caused enquiries of existence of the named biological parents Smt. Rupia, W/o Krishna, aged 30 yrs., N/o Kalwakurthi, Mahaboobnagar District of Baby Premavathi, Smt. Kasali, W/o Tharia, aged 30 yrs. Talmoor, Kalwakurthy, MBNR Dist. Of Baby Alina, S. Komli, W/o Bandari, aged 35 yrs. Palnoor, Kalwakurthy of Baby Manjusha and issued non-existence certificate.
25.	Sri Mohd. Jahangir Ali, MRO, Achampet, Mahaboobnagar Dist	He speaks about the non existence of the named biological parents Ms. Chukhali of

		Baby Lavanya, aged 27 yrs., N/o Achampet Thanda, Achampet, MBNR Dist., (2) Sridevi, W/o Jaganna, aged 30 yrs of baby Miya, N/o Achampet, (3) Smt. Buiji, W/o Ramulu, aged 35 yrs. of baby Ganga, N/o Ragaguntalpet, Achampet Mandal and (4) Smt. Yellamma, W/o Balia, aged 28 yrs. of baby Shaki, N/o Achampet and issued non-existence certificates.
26.	Sri A. Ramu, MRO, Nagarkurnool Mandal, Mahaboobnagar Dist	He speaks about the about the non existence of the named biological parents Smt. Devi, W/o Loya, aged 25 yrs., N/o Nagarkurnool of MBNR Dist. of Baby Lissa and issued non-existence certificate.
27.	Sri B. Satyanarayana, MRO, Amangal Mandal, Mahaboobnagar Dist	He speaks about the non existence of the named biological parents Smt. Masru, W/o Kalia, aged 27 yrs., N/o Mysigarvli Village of Mahaboobnagar District of Richd and Smt. Gomli, W/o Chandu, aged 32 yrs., N/o Thomas Peter, Chintanagutta Thanda, MBNR Dt., of Baby Sofia, Smt. Bitchi, W/o Tirupathi, aged 28 yrs., N/o Nakagundi, MBNR Dist. of Baby Sridevi and issued non-existence certificate of biological parents and also non-existence thandas of Thomas Peter, Chintanagutta Thanda and Nakagundi Thanda in Amangal Mandal of MBNR District.
28.	Sri Mohd. Farooq Ali, S/o Mohd. Yakub Ali, aged 48 years, Occ: Muncipal Commissioner, Adilabad Municipality, R/o Adilabad	He speaks about the non existence of the named biological parents Laskar, aged 45 yrs. and Vicky, 35 yrs. of baby Jyothika, R/o Ashok Nagar, Adilabad and issued non-existence certificate.
29.	Sri B. Sudarshan Rao, S/o Gopal Rao, aged 50 years, Occ: MRO, Adilabad	He speaks about the non existence of the named biological parents Laskar, aged 45 yrs. and Vicky, 35 yrs. of baby Jyothika, R/o Ashok Nagar, Adilabad and issued non-existence certificate.
30.	Sri Rathod Sivlal Naik, S/o Jaisingh Naik, aged 56 years, Occ: Sub Treasurer at Uttoor, R/o 1-1-896, Ravindra Nagar, Near Hanuman Temple, Adilabad	He speaks about the non existence of the named biological parents Laskar and his wife Bikky of Ashoknagar, Adilabad of baby Jyothika.
31.	Sri Narsing Rao, S/o Ramulu, aged 50 years, Occ: MRO, Nirmal	He speaks about the non existence of the named biological parents Haria, aged 30 yrs. and his wife Smt. Lachmi, aged 25 yrs., R/o Nirmal of baby Oliyvia and issued non-existence certificate.
32.	Sri M.A. Azeez, S/o Mohd. Abdul Razzak, aged 52 years, Occ: Muncipal Commissioner, Nirmal, R/o Adilabad	He speaks about the non existence of the named parents Haria, aged 30 yrs., and his wife Smt. Lachmi, aged 25 yrs., R/o Nirmal of baby Olivia and issued non-existence certificate.
33.	Sri K. Ramesh, S/o K. Anandaiah, aged 33 years, Occ: Muncipal Commissioner, R/o Khammam	He speaks about the non existence of the named biological parents Surya, aged 35 yrs. and Sruthi, aged 30 yrs., R/o Khammam of baby Marina and issued non-existence certificate.
34.	Sri S.Venkateswarlu, aged about 48 years, MRO Khammam Urban.	- DO -
35.	Sri Veda Naikam, aged about 48 years, Occ: MRO, Khammam Rural	- DO -
36.	Sri Dondavan Ramsingh, S/o Bhima, aged 60 years, Occ: Fruit Vendor at Khammam Bus Stand, R/o H.No. 4-1-169, Zahirpura Lambada Thanda, President, Khammam Maidana Prantha Girijan	-Do-

	Sangham, Khammam	
37.	Sri Syed Sujavaddin, aged about 52 years, MRO, Yellareddy Mandal, Karimnagar	He speaks about non existence of the named biological parents existence of the named biological mother Janaki, aged 18 years, R/o Almaspura, Karimnagar Dist of baby Durga and issued non-existence certificate.
38.	Smt. R. Manjula, W/o R. Prakash, aged 50 years, MRO, Saidabad Mandal, Hyd	She speaks about the non existence of the named biological parents Balaiati, aged 31 years and his wife Sumathi, aged 32 yrs., R/o Saidabad of baby Bloosum and Pantel, aged 24 years and his wife Neela, aged 22 yrs., R/o Madannapet of baby Kaliya and issued non-existence certificates.
39.	Smt. Rajya Laxmi, A.D. Woman Development and child welfare department, Shishuvihar, Yusuf guda, Hyderabad.	She supplied the documents pertaining to the TLC home and its management.
40.	Sri B. Surya Rao, aged about 50 years, Dy.Collector-Cum-MRO, Hayathnagar Mandal, RR Dist	He speaks about the non existence of the named biological parents Hari, aged 33 yrs. and Zamaka, aged 35 years, R/o B.N. Kalia Nagar of baby Shreya and issued non-existence certificate.
41.	Sri C. Srirama Reddy, Dy. Collector-Cum-MRO, Balanagar Mandal, RR Dist	He speaks about the non existence of the named named biological unwedded mother Sarala, aged 21 years of Balanagar of baby Kiranmayee and issued non-existence certificate.
42.	Sri Raghunath Sharma, aged 40 years, MRO, Shaikpet Mandal, Hyd.City	He speaks about the non existence of unwed mother Nazia, aged 19 years, R/o Banjara Hills of baby Amir and issued non-existence certificate.
43.	Sri T. Prakash, MRO, Nalgonda	He speaks about the named biological parents Gopa, aged 30 yrs., and his wife Saki, aged 27 yrs., R/o Gandhi Nagar, Nalgonda of baby Geetha and issued non-existence certificate vide Lr.No. B/1462/2002, dt: 19.2.2002.
44.	Sri Velijala Satyanarayana, S/o Krishnaiah, Ex-Councillor of Gandhinagar, X Ward, R/o H.No. 6-3-883, Nalgonda	He speaks about the non existence of the named biological parents Gopa and Saki, R/o Gandhi Nagar, Nalgonda of baby Geetha.
45.	Smt. Desidi Prabhavathi, W/o Narender Reddy, aged 45 years, Sarpanch, Narayanapuram	She speaks about the non existence of the named biological parents Ramu and his wife Vali, Occ: Riksha Puller, R/o Narayanapuram of baby Jane and issued a non-existence certificate.
46.	Sri P. Purushotham Reddy, MRO, Miryalaguda, Nalgonda Dist	He speaks about the non existence of the named biological parents Chandru, aged 35 yrs. and his wife Kaika, aged 30 yrs. of baby Nandita, Kasna, aged 30 yrs. and his wife Shanti, 28 yrs. of baby Mydhili of Miryalaguda and issued non-existence certificate vide Lr.No. M/967/2002, dated: 28.2.2001 and he speaks about the non existence of the named Bodagunda thanda in the mandal as stated in the relinquishment deed of the named biological parents Lakshman and Lakshmi of master Jyoti and issue of letter bearing No. M/967/2002, dated: 20.2.2002.
47.	Sri M. Sekhar Reddy, MRO, Gurrampod, Nalgonda Dist	He speaks about the non existence of the named village Jynugundam in Gurrampod mandal as stated in the relinquishment deed by the named biological parents Dakya, aged 35 yrs., and his wife Jammu, aged 30 yrs. of Jynugundam of Gurrampod Mandal of the Sanjana and issue of letter vide No.

	Sri V. Shakru, MRO, Devarakonda, Nalgonda Dist	He speaks about the non existence of the named biological parents Dhanam, aged 41 yrs., and his wife Sulochana, aged 39 yrs., Occ: Riksha Puller, R/o Devarakonda of baby Nancy and issue of letter No. C/Adoption/2002, dated: 11.2.2002 and also speaks about the non existence of the named villages as mentioned in the relinquishment deeds by the named biological parents Saly of Chandampalli of baby Sweety and Laxmaiah and Komili of baby Pravalika Chandamapalli..
49.	Sri Bhanoth Zamla Naik, S/o China Surya, aged 45 years, N/o Tuljaraopet, R/o Suryapet, Nalgonda Dist	He speaks about the non existence of the named biological mother Smt. Shanti, R/o Suryapet of baby Sukanaya.
50.	Sri S. Ramachandraiah, MRO, Peddavora, Nalgonda Dist	He speaks about the non existence of the named biological parents Baji of Nagarjunasagar of baby Proornima, Maria and Kamli, R/o Sagar of baby Shranaya and also Korra thanda of Nagarjuna sagar (Rakya and Rmaoli of baby Reha) and issue of letters accordingly.
51.	Sri C. Lingaiah, S/o Durgaiah, aged 52 years, Occ: Sarpanch, R/o Kanagal, Nalgonda Dist	He speaks about the non existence of the named biological parents Sreenu, aged 26 yrs., and his wife Smt. Chainni, aged 17 years, R/o Kanagal of baby Ameliya and issue of non-existence certificate.
52.	Sri K. Anjaiah, S/o Krishnaiah, aged 33 years, Occ: Sarpanch, R/o Mallepalli, Nalgonda Dist	He speaks about the non existence of the named biological parents Mani, aged 30 yrs., and his wife Smt. Marvalu, aged 25 years, R/o Cheetukunta, Mallepally of baby Sitara and Panthula, aged 40 yrs., and his wife Mangi, R/o Mallepally of baby Adithi and issue of non-existence certificates.
53.	Sri V. Srinivasa Reddy, S/o Janga Reddy, aged 32 years, Occ: Village Asst. Secretary, Mallareddypally, Kokkerala Gouraram Mandal, Chintapalli, Nalgonda Dist	He speaks about the non existence of the named biological parents Damla and his wife Ghasmi, R/o Maratpally thanda of Mallareddypally of babies Sasikala and Srikala and issue of non-existence certificate.
54.	Sri Koppula Yadaiah, S/o Musalaiah, aged 38 years, Occ: Sarpanch, Vinjamur Village, Mandal Chintapalli, Nalgonda Dist	He speaks about the non existence of the named biological parents Venkatesh and his wife Swetha, R/o Vinjamur of baby Jaquiline and issue of non-existence certificate.
55.	Sri Konreddy Lakshmaiah, S/o Sailu, aged 32 years, Sarpanch, Thidedu, Mandal Chintapalli, Nalgonda Dist	He speaks about the non existence of the named biological parents Keshva and his wife Dharmi, R/o Thidedu of Vismya and issue of non-existence certificate.
56.	Smt. Kummari Mangamma, W/o Narayana, aged 35 years, Occ: Sarpanch, Anumula, Alia Mandal, Nalgonda Dist	He speaks about the non existence of the named biological parents Sandra and his wife Shanti, R/o Halia of baby Zessy and issue of non-existence certificate.
57.	Smt. Ramavath Rajya Lakshuni, W/o Chandulal, aged 29 years, Occ: Sarpanch, Chandampet, Chandampet Mandal, Nalgonda Dist	He speaks about the non existence of the named biological parents Bhaskar and his wife Heerabai, R/o Chandampet of baby Sachin and issue of non-existence certificate.
58.	Sri S. Abraham, Village Secretary, Amangal, Vemulapalli (M), Nalgonda Dist	He speaks about the non existence of the named biological parents Bicha and his wife Bodi, R/o Amangal of baby Suguna and issue of non-existence certificate.
59.	Sri B. Biksha, MRO, Tripuraram, Nalgonda Dist	He speaks about the non existence of the named biological parents Munia and his wife Mounika, R/o Ragadapa and issue of non-existence certificate.
60.	Sri Ramavath Bhimla, S/o Bikya, aged 55 years,	He stated that the named biological parents

	Occ: Village Asst. Secretary, Ragadapa Village, Tripuraram Mandal, Nalgonda Dist.	Munia and his wife Mounika, R/o Ragadapa of baby Anfal are not residents of Ragadapa village.
61.	Sri M. Ravinder, S/o Narsaiah, aged 28 years, Sarpancha, Yelkaram Village, Suryapet Mandal, Nalgonda Dist.	He speaks about the non existence of the named biological parents Borjia and his wife Laxmi, R/o Rajanaik Thanda of baby Lathika and issue of non-existence certificate.
62.	Smt. Korra Hansi, W/o Rana, aged 27 years, Korra Thanda, Hamlet of Chillapuram, Narayanapuram Mandal, Nalgonda Dist.	She speaks about having five female children and due to poverty she has given her fifth child to Tender Loving Care Home and she was given Rs.500/- through a mediator Hathiram.
63.	Sri Korra Rana, S/o Korra Laxma, aged 32 years, R/o Korra Thanda, Hamlet of Chillapuram, Narayanapur Mandal, Nalgonda Dist.	He speaks that he is having five female children and due to poverty he has given his fifth child to Tender Loving Care Home and he was given Rs.500/- through a mediator Hathiram.
64.	Ambothu Hathiram, S/o Dukya, aged 30 years, Lambada, Riksha Puller, R/o Porlagudda Thanda, Vaillapally, Narayanapuram Mandal of Nalgonda Dist.	He speaks about the giving his 3 rd female baby to TLC and taking of Rs.3,000/- and also guiding Korra Rana to give his child to TLC etc., facts.
65.	Ch. Mohan Rao, A.O., Collectorate, Kurnool.	He speaks about the enquiry of the named persons M. Prabhakar Rao and his wife Eshwari Devi, R/o Chinna Obila, Gopalpur Village, Manthani, Kurnool district mentioned in the rejection forms of baby Mulavika and issue of certificate that the said village Gopalpur is not in existence in the Kurnool district.
66.	Sri Prem Raj, S/o Gowri Syam, aged 30 years, Driver, TLC Home, R/o H.No.8-2-373, Road No.5, Banjara Hills, Hyd.	He is the driver of TLC Home and speaks about the purchasing of the stamp papers in a bulk as per the directions of the Chief Coordinator (A-1) from R. Vijaya Laxmi, Stamp Vendor, S.R.Nagar which were used to prepare for relinquishment deeds by A-1.
67.	Smt. Rayalu Vijaya Lakshmi, W/o Koteswara Rao, aged 43 years, Occ: Stamp Vendor, R/o H.No. 7-1-621/287, S.R.Nagar, Hyderabad.	She speaks about the selling of Rs.10/- denomination stamped papers in a bulk to Prem Raj, driver of TLC Home for the purpose of using them as relinquishment deeds etc., facts.
68.	Smt. Geetha Rama Swamy, W/o Siril Reddy, aged 38 years, Laxminagar, Hyderabad.	She is n NGO and speaks about the study conducted in to the matter of relinquishment of Lambada babies and the homes engaged mediators, lured the lambadas with money and taken the babies on adoption and sent them for inter-country adoption for monetary consideration etc., facts.
69.	Sri Bhngya Bhukya, Asst. Professor, Osmania University	He is an Asst. Professor in Osmania University, associated with PW-68 on the studies conducted on the sale of lambada babies and corroborate the statement of PW-68.
70.	Smt. Jamuna, NGO (Gramya)	She is running NGO by name Gramya conducted study on the life of Lambada women, sale of children and speaks about TLC Home employed mediators to procure Lambada babies and sending them for inter-

71.	Sri T.H.B. Chalapathi, Retd. High Court Judge, Ashok Nagar, Hyd.	He speaks about his visiting of USA in the year 1997 and visiting of the adoptive parents homes, noticed about the mal-nutrition of adoptive babies and etc., facts.
72.	Smt. B. Rama Laxmi, Supdt., Stamps and Registration, Vendors Section, O/o IG, R&S, Musheerabad, Hyderabad.	She furnished the attested Xerox copies of stamp vendors register of Smt. R. Vijaya Laxmi.
73.	The Manager, South Indian Bank, Secunderabad.	He furnished the account particulars of the TLC Home maintained vide Account No.1074 for the period 2.1.98 to 31.3.2002 and receipts of the amount of FERA vide No.010220026
74.	The Manager, Punjab National Bank, Sanathnagar, Hyderabad.	He furnished the account particulars of TLC Home maintained through A/c. No. 19446 from the years 1999 to 2.4.2002.
75.	Sri Prashanth Kumar, Asst. Registrar of Firms, Musheerabad, Hyderabad.	He furnished the registration particulars of St. Theresa's Convent Society.
76.	N. Madhusudhan Reddy, Asst. Audit Officer, CID, Hyderabad.	He speaks about the auditing of the records of TLC Home from 1998 to 2001, receiving the donations from the foreign and Indian adoptive parents, diverting the amounts on the name of building fund and non maintenance of building fund expenditure register.
77.	Sri Md. Amzad Khan, S/o Mahaboob Khan, aged 27 years. Proprietor, Corner Point Hotel, Panjagutta, R/o H.No. 6-3-668/16, Kummari Basti, Panjagutta, Hyd.	Panch Witness
78.	Sri Mohd. Yousufuddin, S/o Mohd. Imamuddin, aged 49 years, Kirana & General-Merchant, Panjagutta, R/o H.No. 6-3-1185/128, B.S.Makta, Greenlands, Hyderabad.	Panch Witness
79.	Sri G. Siva Prasada Rao, S.I. of Police, S.R.Nagar PS, Hyderabad.	(Issued FIR)
80.	Sri N. Sriramulu, Inspector of Police, City Zone, CID, Hyd.	(Asst. I.O.)
81.	Sri Y. Yadagiri, ZI, CID, Nalgonda.	(Asst. I.O.)
82.	Sri Md. Ahmed Khan, Inspector of Police, City Zone, CID, Hyd.	(Asst. I.O.)
83.	Sri B. Devi Das, ZI, CID, Medak.	(Asst. I.O.)
84.	Sri S. Manohar Rao, DSP, CID, Kurnool.	(IO)
85.	T. Bapa Rao, DSP, CID, WPC, Hyderabad.	I.O. and filed the Charge Sheet.

(Sd/-) xx

(T. PAPA RAO)
Dy. Superintendent of Police,
W.P.C., C.I.D., Hyderabad.
(Investigating Officer)