

Dated: 19th June 2025

To:

**The Inspector of Police
& Station House Officer,
Cubbon Park Police Station
Kasturba Road-560001.**

Sir,

Subject: Information of Cognizable offences under Section 173 of the Bharatiya Nagarik Suraksha Sanhita, 2023, regarding the commission of offences attracting prosecution under Section 106 for – Causing death by negligence, Section 100 - for Culpable homicide Section 105 – Punishment for culpable homicide not amounting to murder, Section 125(a) & (b) – Act endangering life or personal safety of others, Section – 115(2) – Voluntarily causing hurt, Section 316 - Criminal breach of trust, Section 316(5) - punishment for criminal breach of trust, Section 335 - Making a false document, Section 340 - Forged document or electronic record, Section 337 - Forgery of important public records and official documents, Section 255 - Public servant Disobeying direction of law, Section 318 - Cheating Section 340(2) – Fabrication of false evidence Read With Section 3(5) & 61(2) and other applicable sections of the Bharatiya Nyaya Sanhita, 2023, to register this First Information Report (FIR) against the following Accused individuals and entities for willful dereliction of duty, criminal negligence, Act endangering life or personal safety of others, Cheating, Causing death by negligence amounting to Culpable homicide and active conspiracy, which resulted in the tragic stampede and loss of 11 innocent lives on the occasion of the felicitation of the Royal Challengers Bengaluru (RCB,) on June 4, 2025, near the M.Chinnaswamy Stadium.

ACCUSED:

- Sri.D.K.Shivakumar-MLA &
The Deputy Chief Minister of Karnataka.**
(Minister of Bengaluru City
Development including BBMP, BDA)
Room No: 335, 336, 337-337A,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.
Residing at:
No.252, 18th Cross,
Sadhashivanagara,
Bengaluru - 560 001.



2. **Dr. Shalini Rajneesh, IAS,**
Chief Secretary
Government of Karnataka
(Also the Administrative head
of the Department of Personal
and Administrative Reforms-DPAR)
Room No.320, 3rd Floor,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.
3. **Smt.Satyavathi I.A.S**
Secretary to Government-DPAR
Room No.246, 2nd Floor,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.
4. **Sri.Subendhu Gosh,**
Chief Executive Officer - KSCA
Karnataka State Cricket Association.
Office at the M.Chinnaswami Stadium,
Cubbon Road,
Bengaluru - 560 001.
5. **Sri.Menon Vijayan Rajesh**
The Senior most Director
Of M/s.Royal Challengers Sports Pvt Limited.,
No.24, 'UB Tower',
Vittal Mallya Road,
Bengaluru - 560 001.
6. **Sri.Thimmaiah Venkata Varadhana**
Managing Director,
DNA Entertainment Networks Pvt. Ltd.
No.7, (Old 215), Bellary Road,
Lower Palace Orchards,
Aramane Nagar,
Bengaluru - 560 001.
7. **Sri. B. Dayananda, IPS,**
The then ADG &
Commissioner of Police,

Bengaluru City,
Infantry Road,
Bengaluru-560001.
(As on 04-06-2025)

8. **Sri. Vikash Kumar Vikash, IPS,**
The then I.G & Additional Commissioner of Police,
West, Bengaluru City.
Bengaluru - 560 001.
(As on 04-06-2025)
9. **Sri. Shekar H Tekkannavar, IPS,**
Deputy Commissioner of Police,
Central Division,
Bengaluru City.
(As on 04-06-2025)
10. **Sri C Balakrishna,**
Asst commissioner of Police,
Cubbon Park,
Kasturaba Road,
Bengaluru City.
(As on 04-06-2025)
11. **Sri A K Girish,**
Police Inspector,
Cubbon Park Police Station,
Bengaluru.
(As on 04-06-2025)
12. **Mr Karibasangowda,**
DCP Vidhan Soudha Security,
Bengaluru City Police,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.
13. **Shri Siddaramaiah MLA &**
The Chief Minister of Karnataka
Room No: 323A,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.

Currently Residing at:

No.1, Kumara Park East,
Gandhi Bhavan Road,
Bengaluru,
Karnataka - 560 001.

Also residing at:

#206, 16 Cross,
M.C Layout, Vijayanagara,
Bengaluru -560 040.

Permanent Resident of:

No.32, Siddramana Hundi,
Varuna Hobli,
Mysore Taluk,
Mysore District.

14. **Dr.G.Parameshwara MLA &
The Minister for Home**
(Excluding Intelligence)
Government of Karnataka,
Room No: 327-327A,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.
15. **Mr.Tushar Girinath IAS,
Additional Chief Secretary-ACS
Home Department - G.O.K**
Room No: 222, 2nd Floor,
Vidhana Soudha,
Dr. Ambedkar Veedhi,
Bengaluru - 560 001.

PREAMBLE:

Compulsion of Commercial interest, of the 1st Accused Sri. D.K.Shivakumar has Culminated in a Catastrophe, Causing the death of ELEVEN young innocent individuals and injuring over 56 others in a stampede, that COULD HAVE and SHOULD HAVE been prevented.

After 18 long years, it was history in the making as the Royal Challengers Bengaluru, finally lifted their first IPL trophy, on the 3rd of June 2025. The joy of victory turned into the pain of loss outside the M. Chinnaswamy Stadium on the 4th of June 2025. **Eleven young lives were lost and over 56 injured in a stampede, that COULD HAVE and SHOULD HAVE prevented.**

COMMENCING WITH COMMERCIAL INTEREST, CULMINATING IN CULPABLE HOMISIDE:

The 1st Accused Sri. D.K. Shivakumar had allegedly been in consultation with M/s. Diageo Plc, the British distiller and current owner of RCB, through its Indian unit United Spirits Ltd, which was considering to sell a part or all of the franchise, which according to the franchise's valuation was estimated at \$2 billion (₹17,000 crore). Although the talks were allegedly at an early stage, the negotiations were not progressing because, the RCB franchise was allegedly valued ONLY at around Rs.8,600 crore (approximately \$1 billion) by the negotiators, engaged on behalf of the 1st Accused Sri. D.K. Shivakumar. According to information from unverified sources, the **5th Accused company RCB** franchise was willing to go ahead with the deal, ONLY if the offer was worth around \$2 billion (₹17,000 crore).

An image showing the 1st Accused Karnataka Dy CM Sri. D.K. Shivakumar and the RCB logo, published by Deccan Herald, is enclosed herewith and marked as **DOCUMENT No.1**.

ORIGINAL PLAN CANCELLED, CULMINATING IN CULPABLE HOMISIDE OF ELEVEN PEOPLE:

The original plan announced by the **franchise RCB was a grand 'Open-Bus Victory Parade', along a 2.5 kilometres stretch, from Vidhana Soudha to the M.Chinnaswamy Stadium**, in the evening at 5 PM on the 4th of June, 2025 and that the entry into the Stadium was going to

be restricted to those who have obtained Free passes (limited entry) which was supposed to be available on shop.royalchallengers.com. For which the city's traffic police had already begun working overtime to manage the crowds and traffic movements around the City's CBD. This 'Open-Bus Victory Parade' would have spread the fan crowd along the 2.5 kilometres stretch and the crowd would have dispersed from there itself, without the entire crowd thronging the Stadium. But, because the franchise RCB and the Event Management M/s.DNA were allegedly told by the 1st Accused Sri.D.K.Shivakumar (who was already in a negotiation allegedly to buy the RCB franchise) to cancel the 2.5 kilometres victory parade and invite everyone to converge at the Stadium, for the felicitation programme, which was being solely Managed and Monitored by the 1st Accused D.K.Shivakumar directly was cancelled. The 'Open-Bus Victory Parade' was cancelled by the Commissioner of Police, on the flimsy ground of lack of sufficient security, allegedly at the behest of the 1st Accused D.K.Shivakumar, using an alleged (Name-Sake) communication from the 4th Accused KSCA and 6th Accused DNA.

But, what replaced the grand 'Open-Bus Victory Parade', along a 2.5 kilometres stretch were TWO felicitation events. One on the Grand Steps of the Vidhana Soudha, which would be attended by several important personalities including the Governor, Chief Minister, along with other ministers and dignitaries, which required massive security deployment. The next was the felicitation at the Chinnaswamy Stadium, personally planned by the 1st Accused D.K.Shivakumar, although he got the Accused No.4 and Accused No.5 to announce the decision officially. Even the Office of the 7th Accused the Commissioner of Police had released a Traffic Advisory that speaks ONLY about the special felicitation ceremony organised by the 4th Accused KSCA at the

Chinnaswamy Stadium at 5:00 PM for the RCB players, on the 4th of June, 2025.

One cannot help but question the timing. **Why the rush? Why couldn't the felicitation wait a few more days? And why two events in two venues that are bound to tax the police?**

The craving for MEDIA attention - personal publicity and the need to create a public impression, that he - the 1st Accused D.K.Shivakumar was the controller of the events concerning the 5th Accused franchise RCB, *(which he was allegedly negotiating to buy)* appeared to be more important than human safety. The Political Administration *(the Accused persons, leaders, officials and organisers)* have Collectively Committed acts of Criminal Negligence, Willful dereliction of duty, Endangering life & personal safety of others, Causing death by negligence amounting to Culpable homicide, etc., which would attract prosecution leading to punishment Under applicable provisions of the Bharatiya Nyaya Sanhita, 2023.

The desire for individual glory and greed to create a public impression that he, the 1st Accused D.K.Shivakyumar was in control and authority over the affairs of the 5th Accused RCB *(which he was allegedly negotiating to buy)* and wanting a Spectacular Entry into the Cricket World, with Pomp and Publicity, to Protect his Commercial interest, led to the Collective Consequential acts of Criminal Negligence Culminating in Culpable homicide, Causing death by negligence, endangering life or personal safety of others, etc.,

The list of those who lost their lives according to available information are:

- i. **Mr.Prajwal**, S/o. Ganesh, aged around 21 years, an engineering graduate and an employee at a private firm. Resident of Yelahanka New Town, Bengaluru.
Was allegedly **taken to the Vydehi Super Speciality Hospital at around 3:34 PM and declared dead at around 3:45 PM.**
- ii. **Ms.Divyanshi**, D/o.Shivkumar, aged around 14 years, Resident of Kattigenahalli, (Kannur) Yelahanka, Bengaluru, a Class 9 standard student -schoolgirl.
Was allegedly **taken to the Bowring Hospital at around 4:07 PM and declared dead at around 4:15 PM.**
- iii. **Mr.Manoj Kumar N.D**, S/o.Devaraj, aged around 19 years, was a college student and a Resident of Nagasandra Village, Tumkur, Manoj Kumar, a student at Presidency College in North Bengaluru.
Was allegedly **taken to the Bowring Hospital at around 3:35 PM and Declared Dead at around 4:27 PM.**
- iv. **Mr.Poorna Chandra**, S/o.R.B.Chandru, aged around 23 years, a Civil Engineer and a Resident of Rayasamudra, Mandya.
Was allegedly **taken to the Vydehi Super Speciality Hospital at around 4:20M and declared dead at around 4:34 PM.**
- v. **Smt.Kamatchi (Devi)**, D/o. S.Moorthy, aged around 29 years, Resident of Udumalpet, Tiruppur, TN, an Amazon employee in Bengaluru.
Was allegedly **taken to the Bowring Hospital at around 4:05 PM and Declared Dead at around 4:40 PM.**
- vi. **Mr.Bhoomik**, S/o.Lakshman, aged around 19-year-old student, Resident of MS Ramiah Layout, Bengaluru.
Was allegedly **taken to the Vydehi Super Speciality Hospital at around 4:59 PM & Declared Brought Dead at around 4:59 PM.**

- vii. **Ms.Chinmayi Shetty**, D/o. Karunakara Shetty, aged around 19-year-old student, Resident of Doddakallasandra, Bengaluru. Was allegedly taken to **the Manipal (Vikram) Hospital at around 4:35 PM and Declared Dead at around 5:00 PM.**
- viii. **Ms.Sahana Rajesh**, D/o.Rajesh, aged around 23 years, Native and Resident of Kolar, a software developer & Bosch employee. Was allegedly taken to **the Vydehi Super Speciality Hospital at around 4:32 PM and Declared Dead at around 5:07 PM.**
- ix. **Mr.Shiva Linga C**, S/o.Chandappa, aged around 17-year-old Student, Resident of Honigere, Yadgir. Was allegedly taken to **the Bowring Hospital at around 4:35 PM and Declared Dead at around 5:08 PM.**
- x. **Mr.Shravana K.T**, S/o.Sridhar, aged around 20 years, was a student, Resident of Kurutahalli, Chickaballapur. Was allegedly taken to **the Bowring Hospital at around 4:40 PM and Declared Dead at around 5:10 PM,**

AND,

- xi. **Mrs.Akshata Pai**, W/o.Ashay Ranjani, aged around 26 years, a chartered accountant & Resident of Ravindra Nagar, Uttara Kannada. Was allegedly taken to **the Bowring Hospital at around 4:45 PM and Declared Dead at around 5:15 PM.**

ALONG WITH 56 others being injured.

COLLECTIVE COMMISSION OF CRIME, CULMINATING IN CULPABLE HOMICIDE:

1. The collective act of Criminal Negligence and Culpable Homicide began with the letter dated 3rd June 2025 (*allegedly at 10:30 am*), written by Accused No.4 Subendhu Gosh, the CEO of KSCA, **EVEN BEFORE THE FINALS WAS PLAYED in Ahmedabad**, addressed to the Assistant Commissioner of Police (*Traffic*), Cubbon Park Police Station, on behalf of the 6th Accused Event Management Company DNA

Entertainment Networks, **just informing the ACP (Not requesting) that there will be a 'RCB Victory parade and celebrations'**, "in case Royal Challengers Bangalore wins the IPL 2025 title, M/s. DNA Entertainment Networks Private Limited shall make plans for potential victory parades around the M.Chinnaswamy Stadium, which shall end with a victory celebrations at the Stadium".

MOST NOTE WORTHY: "in case Royal Challengers Bangalore wins the IPL 2025 title".

AND RCB won by 6 runs at 11:30 PM (Night) on the 3rd of June 2025.

A copy of the letter dated 3rd June 2025 written by the 4th Accused to the ACP, is enclosed herewith and marked as **DOCUMENT No.2.**

2. **EVEN BEFORE THE IPL FINALS WAS PLAYED in Ahmedabad, on 3rd of June 2025 itself, Accused No. 2 the Chief Secretary of the Government of Karnataka Mrs. Shalini Rajneesh, who is also the Administrative head of the Department of Personnel and Administrative Reforms-DPAR, had orally approved the event, allegedly on the oral instructions of Accused No.1 the DCM of Karnataka, Sri. D.K. Shivakumar in particular and also with the in-principle concurrence of the Accused No.13 Chief Minister Sri. Siddaramiah, even before the final game was played.** After the Accused No.4 Karnataka State Cricket Association (KSCA) had **sought for the permission on the morning of June 3rd (allegedly at 10:30 am),** hours before the IPL final was held, the request was reportedly routed through the Department of Personnel and Administrative Reforms (DPAR), and **the approval was allegedly endorsed by the 2nd Accused Dr. Shalini Rajaneesh BEFORE THE MATCH was played and the RESULT OF THE IPL FINAL WAS NOT YET KNOWN.**

A copy of the News report by TOI stating that the Chief Secretary had Approved the Event on 3rd June 2025 itself, is enclosed herewith and marked as **DOCUMENT No.3(a) & (b)**.

3. **EVEN BEFORE THE IPL FINALS WAS PLAYED** (which began at 7:30pm) in Ahmedabad, at 5:31 pm, on 3rd June 2025, Accused No.3 **Smt. Sathyavathi the Secretary to Government – DPAR**, (referring a letter CEO/PC/IPL 18 2025/123 dated 03-06-2025, by the 4th Accused CEO of KSCA) wrote to the 12th Accused Deputy Commissioner of Police, Vidhana Soudha Security **Mr.Karibasanagowda**, mentioning about the felicitation for the players of Royal Challengers Bengaluru, on the Grand Steps of Vidhana Soudha by the Chief Minister of Karnataka, scheduled for the next day i.e., **the 4th of June, after the RCB team wins the match on the 3rd of June, 2025.**

A copy of the letter dated 3rd June 2025 written by the Accused No. 3 to the 12th Accused DCP, is enclosed herewith and marked as **DOCUMENT No.4.**

4. Although there being **NO Official Sanction, NO Formal Consent** and **NO Approval** from the Chief Minister's office, **EVEN BEFORE THE MATCH HAD CONCLUDED**, preparations had commenced early on the night of 03.06.2025, including unauthorised construction of a stage at the Grand Steps of Vidhana Soudha, a high-security zone, at the instance of the **2nd Accused Dr.Shalini Rajaneesh** and Co-ordinated by the **3rd Accused Ms/Satyavathi**, without any objection or resistance from the 12th Accused DCP of Vidhana Soudha Security **Sri.Karibasanagowda.**

5. After the Unauthorised construction of the stage had started on the night of 3rd June with oral instructions from the 2nd Accused Chief Secretary **Dr.Shalini Rajaneesh**, which percolated down to the other

officials and contractors through the 3rd Accused **Mrs.Satyathi**. The next day it is reliably learnt that the Expansion of the Unauthorized Stage and other Facilities was ordered by the 2nd Accused Ms. Shalini Rajneesh, who personally visited the venue (*Grand Steps*) along with the 3rd Accused Ms. Satyathi and directed the contractors to arrange for an increase the seating arrangement, from 25 to 100 persons, without fitness or safety clearances from PWD, Fire-Force or other competent authorities. The CC Cameras in Vidhana Soudha would establish the same.

6. The 2nd Accused Chief Secretary **Dr.Shalini Rajaneesh** is alleged to have indulged in the Misuse and Misappropriation of Government Funds to organise the function. Despite the event being a private initiative by the 4th Accused KSCA and the 6th Accused (*An Event Management Entity*) DNA to felicitate the players of the 5th Accused franchise RCB, the 2nd Accused Chief Secretary is believed to have insisted that the entire expenditure be borne by the State Government, indicating clear financial misappropriation by a public servant for personal gain. Notably, the rumour mill amongst the public servants in the Vidhana Soudha is that, **there are alleged financial links of the 2nd Accused Ms.Shalini Rajneesh's brother with the 6th Accused DNA Entertainment Networks**, indicating a conflict of interest and potential abuse of official position. This would attract prosecution and punishment in accordance with appropriate provisions of the Bharatiya Nyaya Sanhita, 2023.

7. There are wide spread rumours and allegations that **the Organizers of IPL manipulate cricket matches** and particular game happenings during IPL, for monetary purposes, **which constitutes MATCH FIXING**. Players along with team officials and other individuals

are also alleged to be engaged in **cheating games** by collectively influencing the results. The activities/preparations such as the one seen in the instant case, **of the preparations on the 3rd of June 2025 itself, for the Victory Celebrations of RCB EVEN BEFORE THE IPL FINALS WAS PLAYED in Ahmedabad**, give rise to the **Suspicion of MATCH FIXING for COMMERCIAL BENEFIT**: The readiness of the 6th Accused Event Managers M/s.DNA Entertainment Networks and the 4th Accused KSCA in going ahead with **THE STAGE CONSTRUCTION**, at the Vidhana Soudha **and THE OPEN BUS PARADE PLANNING, EVEN BEFORE the match's result was declared at 11:30 PM on the 3rd of June**, raises suspicion that the TATA IPL Final **MAY HAVE BEEN RIGGED**, enabling pre-planned monetisation and government misuse.

8. At 7:01 am on the 4th of June 2025, the 5th Accused RCB, although coming to know that the permission had already been unofficially granted by the Government, **in particular by the 2nd Accused Dr.Shalini Rajneesh, EVEN BEFORE RECEIVING THE FORMAL PERMISSION** announced about the **VICTORY PARADE, which was going to start at 3:30 PM from the Vidhana Soudha, culminating at the M.Chinnaswamy Stadium.**

A copy of the Tweet by the Accused No.5 at 7:01 AM, on 4th June, is enclosed herewith and marked as **DOCUMENT No.5.**

9. At around 8:00 am on the 4th of June 2025, the 5th Accused RCB **ONCE AGAIN EVEN BEFORE RECEIVING THE FORMAL PERMISSION**, made a public declaration, with a Tweet about the Victory Celebration, scheduled for the evening.

A copy of the Tweet by the Accused No.5 at 8:00 AM is enclosed herewith and marked as **DOCUMENT No.6.**

10. On the morning of 4th June, allegedly **at around 10:00 AM**, the 12th Accused **Sri.M.N.Karibasavanna Gouda**, the DCP (Vidhana Soudha Security) **wrote a well-articulated and diplomatically drafted reply letter to the Accused No.3 Smt. Sathyavathi**, the Secretary to Government-DPAR, vide DCP/VSS/CB/ETHARA/19/2025, wherein the DCP had in a very scuttle manner expressed his reservations, giving an impression that, he had cautioned the Government in advance, about several issues that were not in favour of holding the felicitation programme, at such a short notice, without proper arrangements being put in place, on the 4th of June itself. **Some of the cleverly articulated specific contentions raised by the DCP are as follows:**

Para-1) ರಾಯಲ್ ಚಾಲೆಂಜರ್ಸ್ ಬೆಂಗಳೂರಿನ ಕ್ರಿಕೆಟ್ ತಂಡದ Fan Following ದೇಶವ್ಯಾಪ್ತಿಯದು ಇದರಿಂದ ವಿಧಾನಸೌಧ ಭವನ ಪಾದಭಾಗದಲ್ಲಿ, ಕೌಟುಂಬಿಕವಾಗಿ ತುರ್ತಾಗಿ ಆಯೋಜಿಸಲಾದರೆ ಭದ್ರತೆ ಒದಗಿಸುವುದು ಕಷ್ಟಕರ. ವಿಧಾನಸೌಧ ಉಪ ವಿಭಾಗದಲ್ಲಿ ಪೊಲೀಸರು ಅಪರ್ಯಾಯವಾಗಿರುವುದರಿಂದ ಭದ್ರತೆ ಒದಗಿಸುವಲ್ಲಿ ಸಮಸ್ಯೆ ಉಂಟಾಗುವ ಸಾಧ್ಯತೆ ಇದೆ.

(The Royal Challengers Cricket Team has a Nationwide Fan Following, as such if the programme is to be arranged on the footsteps of the Vidhana Soudha in such a short notice (urgently). Arranging for the security would be difficult, as the Vidhana Soudha division has a shortage of police personnel which could cause some security trouble).

Para-4) ವಿಧಾನಸೌಧ ಕಟ್ಟಡವು Vital Installation ಕಟ್ಟಡವಾಗಿದೆ. ಕಟ್ಟಡದ ಭದ್ರತೆಯ ದೃಷ್ಟಿಯಿಂದ ವಿಧಾನಸೌಧದ ಆವರಣದ ಒಳಗೆ ಮತ್ತು ಹೊರಗೆ CCTV ಕ್ಯಾಮೆರಾಗಳನ್ನು ಸ್ಥಾಪಿಸಲು ಸೂಚಿಸಲಾಗಿದೆ. ಆದರೆ, ಇದು ಈವರೆಗೆ ಸ್ಥಾಪಿಸಲಾಗಿಲ್ಲ. ಕ್ರಿಕೆಟ್ ಅಭಿಮಾನಿಗಳು ಲಕ್ಷಾಂತರ ಸಂಖ್ಯೆಯಲ್ಲಿ ಕ್ರಿಕೆಟ್ ಆಟಗಾರರನ್ನು ಸನ್ಮಾನಿಸಲು ಬರುತ್ತಿರುವ ಹಿನ್ನೆಲೆಯಲ್ಲಿ ಭದ್ರತೆಯ ದೃಷ್ಟಿಯಿಂದ CCTV ಬಹಳ ಅಗತ್ಯವಾಗಿದೆ...ಇದರಿಂದ ಭದ್ರತಾ ವ್ಯವಸ್ಥೆಯ ಉಲ್ಲಂಘನೆಯ ಸಂಭವನೀಯತೆ ಇದೆ.

(The Vidhana Soudha building being a Vital Installation building, regarding the security of the building, CCTV cameras have been requested to be installed in the Vidhana Soudha premises and in front. They have not been installed. Since millions of cricket fans are coming to the said felicitation program, CCTV is required for security reasons... there is a possibility of disruption to the security system).

Para-5) ಸಾರ್ವಜನಿಕ ಕಾರ್ಯಾಲಯದಿಂದ ಕ್ರಿಕೆಟ್ ತಾರೆಗಳನ್ನು ಸನ್ಮಾನಿಸುವ ಕಾರ್ಯಕ್ರಮ ವೇದಿಕೆಯನ್ನು.....ವೇದಿಕೆಯ ಸ್ಥಿರತೆಯ ಬಗ್ಗೆ ಲೋಬಾಯಿಸಲು ಅವಕಾಶ. ವಿಧಾನಸೌಧ ವಿಭಾಗ ಸಾರ್ವಜನಿಕ ಕಾರ್ಯದರ್ಶಿಯಿಂದ ಪ್ರಮಾಣ ಪತ್ರವನ್ನು ಪಡೆದಿರುತ್ತಾರೆ. ಕನಿಷ್ಠ 02 ಗಂಟೆ ಮೊತ್ತಮುಂದಾಗಿ ವೇದಿಕೆಯನ್ನು ಪರಿಶೀಲನೆಗೆ ಬಿಟ್ಟಿರಲು ಆಯೋಜಕರಿಗೆ ತಿಳಿಸಲಾಗಿದೆ.

(Regarding the ceremony to felicitate cricketers, the Public Works Department and the Vidhana Soudha Division have issued a certificate regarding the strength of the stage. The organizers are to be informed to leave the stage for inspection at least 02 hours in advance).

Para-8) ರಾಯಲ್ ಚಾಲೆಂಜರ್ಸ್ ಬೆಂಗಳೂರು ಕ್ರಿಕೆಟ್ ತಂಡಕ್ಕೆ Fan Following ದೊರಕಿದ ಕಾರಣದಿಂದ ಹೊರಗಿನ ಅಧಿಕಾರಿಗಳ/ಸಿಬ್ಬಂದಿಗಳನ್ನು ಬಂದೋಬಸ್ತ್ ತಗೆಯಬೇಕಾದಹಾಗಿದ್ದು, ಇದಕ್ಕೆ ಸಮಯ ಬೇಕಾಗುತ್ತದೆ ಇತ್ಯಾದಿ ಸಮಸ್ಯೆಗಳು ಉಂಟಾಗುತ್ತವೆ.

(Royal Challengers Bangalore cricket team has a large fan following, as such/therefore there is a need to hire officers/staff from outside for the bandobast, to do this it would need some time).

Para-9) ಈ ರೀತಿಯ ದೊಡ್ಡ ಕಾರ್ಯಕ್ರಮವನ್ನು ಕಾನೂನು ಮತ್ತು ಸೌಮ್ಯ ಮತ್ತು ಸಂಚಾರಿ ಇಲಾಖೆಯೊಂದಿಗೆ co-ordination ಮಾಡುವುದಕ್ಕೆ ಸಮಯವಿಲ್ಲ, ಸಮಯದಲ್ಲಿ ಕೊಂಚ ಅಸ್ವಸ್ಥತೆ.

(Such a large-scale event requires coordination with law and order and traffic police, and there seems to be a lack of time).

Conclusion) ವಿಧಾನಸೌಧ ಕಟ್ಟಡವು ಪಾರಂಪರಿಕ ಕಟ್ಟಡವಾಗಿರುವುದರಿಂದ ಮತ್ತು Vital Installation jurisdiction ಒಳಪಡುವ ಕಟ್ಟಡವಾಗಿರುವ ಹಿನ್ನೆಲೆಯಲ್ಲಿ, ನಿಯಮದ ಪ್ರಕಾರ ಈ ಪಾರಂಪರಿಕ ಕಟ್ಟಡವನ್ನು ಯಾವುದೇ ರೀತಿಯಲ್ಲಿ ಹಾನಿಗೊಳಪಡಿಸದೇ ಕಾರ್ಯಕ್ರಮವನ್ನು ಆಯೋಜಿಸಲು ಸಮಯ ಮತ್ತು ಸ್ಥಳ ಬೇಕಾಗಿರುತ್ತದೆ. ಆದ್ದರಿಂದ, ಸರ್ಕಾರ ತೆಗೆದುಕೊಂಡ ನಿರ್ಧಾರವನ್ನು ಪಾಲಿಸಲು ಸದಾ ಸರ್ಕಾರದ ನಿರ್ಧಾರಕ್ಕೆ ಬದ್ಧವಾಗಿರುವೆನು.

(Since the Vidhana Soudha building is a heritage building and falls under the jurisdiction of the Vital Installation building, as such there is a need for ample time and space to conduct the program, as per the rules, without any damage to the building from a security perspective. **However, it is submitted that the DCP shall abide and follow any decision taken by the government in this regard).**

Never-the-less, if the government overrules his opinion, the DCP has agreed to abide by the decision of the Government, without asserting his authority to stop the event.

A copy of the letter dated 4th June 2025 written by the 12th Accused DCP to the Accused No.3, is enclosed herewith and marked as **DOCUMENT No.7.**

11. **EVEN BEFORE THE POLICE COULD OFFICIALLY GRANT PERMISSION, on 4th June, on being orally instructed by the 1st Accused DCM Sri.D.K.Shivakumar** without paying heed to the so-called (Name-Sake) concerns raised by the 12th Accused DCP of the Vidhana Soudha Security, Accused No.3 the Secretary to Government-DPAR **Smt. Sathyavathi**, allegedly **after obtaining the oral approval of the Accused No.2** the Chief Secretary of the G.O.K, (referring a letter CEO/PC/IPL 18 2025/123 dated 03-06-2025, written by the CEO of KSCA AND the letter written by the DCP vide DCP/VSS/CB/ETHARA/19/2025 dated 04-06-2025) **IN A HURRY wrote a letter to the 4th Accused** CEO of Karnataka State Cricket Association, **granting them the permission to go ahead with the felicitation programme** on the steps of the Vidhana Soudha, by including certain Name-Sake clauses to be fulfilled by them prior to the programme.

Some of the clauses included in the Hurriedly issued permission is as follows:

ಮೇಲ್ಕಂಡ ವಿಷಯಕ್ಕೆ ಸಂಬಂಧಿಸಿದಂತೆ, ದಿನಾಂಕ:04.06.2025 ರಂದು ವಿಧಾನಸೌಧದ ಪೂರ್ವದ್ವಾರದ ಮೆಟ್ಟಿಲುಗಳ (ಗ್ರಾಂಡ್ ಸ್ಟೆಪ್ಸ್) ಮುಂಭಾಗದಲ್ಲಿ ಮಾನ್ಯ ಮುಖ್ಯಮಂತ್ರಿಯವರು ಮತ್ತು ಮಾನ್ಯ ಉಪಮುಖ್ಯಮಂತ್ರಿಯವರು ಆರ್‌ಸಿಬಿ ಆಟಗಾರರು ಮತ್ತು ಸಹಾಯಕ ಸಿಬ್ಬಂದಿಯನ್ನು ಸನ್ಮಾನ ಮಾಡುವ ಕಾರ್ಯಕ್ರಮಕ್ಕೆ ಸರ್ಕಾರದ ಆದೇಶ ಸಂಖ್ಯೆ: ಸಿಆಸುಇ 22 ಡಿಸೆಂಬೆ 2019, ದಿನಾಂಕ: 26.04.2019 ರಲ್ಲಿ ತಿಳಿಸಿರುವಂತೆ ಸ್ವಚ್ಛತಾ ವೆಚ್ಚ ರೂ. 10,000/-ಗಳನ್ನು ಸರ್ಕಾರದ ಅಧೀನ ಕಾರ್ಯದರ್ಶಿ, ಸಿಆಸುಇ (ಲೆಕ್ಕಪತ್ರ) ಶಾಖೆಗೆ ದಿ.ದಿ ಮೂಲಕ ಪಾವತಿಸುವ ಷರತ್ತಿಗೊಳ್ಳುವುದು ಮತ್ತು ಈ ಕೆಳಕಂಡ ಷರತ್ತು ನಿಬಂಧನೆಗೊಳಪಟ್ಟ ಕಾರ್ಯಕ್ರಮ ನಡೆಸಲು ಅನುಮತಿ ನೀಡಿದೆ.

Para 1) ಜನಸಂದಣಿ ಹೆಚ್ಚಾಗಿ ಸೇರುವ ಕಾರಣ ಈ ಕಾರ್ಯಕ್ರಮವನ್ನು ನಡೆಸುವಾಗ ಭವ್ಯ ಮೆಟ್ಟಿಲಿಗಾಗಲಿ (ಗ್ರಾಂಡ್ ಸ್ಟೆಪ್ಸ್), ಪ್ರತಿಮೆಗಾಗಲಿ, ರಸ್ತೆಗಾಗಲಿ, ಉದ್ಯಾನವನಕ್ಕಾಗಲಿ ಯಾವುದೇ ರೀತಿಯ ಧಕ್ಕೆಯಾಗದಂತೆ ಮುಂಜಾಗ್ರತೆ ವಹಿಸತಕ್ಕದು. ತಪ್ಪಿದಲ್ಲಿ ಯಾವುದೇ ರೀತಿಯ ಅನಾಹುತ ಸಂಭವಿಸಿದಲ್ಲಿ ಅದರ ಸಂಪೂರ್ಣ ದುರಸ್ತಿ ಅಥವಾ ವೆಚ್ಚವನ್ನು ಭರಿಸಲು ಸಿದ್ಧರಿರತಕ್ಕದ್ದು.

Para 2) ಸಂಚಾರ ವ್ಯವಸ್ಥೆಗೆ ಅಡಚಣೆಯಾಗದಂತೆ ಕಾರ್ಯಕ್ರಮವನ್ನು ನಡೆಸತಕ್ಕದು. ಈ ಕುರಿತು ಪೊಲೀಸ್ ಇಲಾಖೆಯ ಸಮನ್ವಯದೊಂದಿಗೆ ಕ್ರಮವಹಿಸುವುದು.

Para 9) ಭವ್ಯ ಮೆಟ್ಟಿಲ ಮೇಲೆ ಸ್ಟೇಜ್ ಅಳವಡಿಸಿದಲ್ಲಿ ಸಹಾಯಕ ಕಾರ್ಯಪಾಲಕ ಅಭಿಯಂತರರು, ನಂ.2, ಕಟ್ಟಡಗಳ ಉಪ ವಿಭಾಗ, ಲೋಕೋಪಯೋಗಿ ಇಲಾಖೆ, ವಿಧಾನಸೌಧ ಇವರ ಧೃಢೀಕರಣ ಪಡೆಯುವುದು ಕಡ್ಡಾಯವಾಗಿರುತ್ತದೆ.

Para 10) ಕಾರ್ಯಕ್ರಮಕ್ಕೆ ಸಿದ್ಧತೆ ಮಾಡುವಾಗ/ ನಡೆಸುವಾಗ ಯಾವುದೇ ರೀತಿಯ ಅವಘಡ ಸಂಭವಿಸಿದರೆ ತಮ್ಮ ಸಂಸ್ಥೆಯೇ ಪೂರ್ಣ ಜವಾಬ್ದಾರಿಯಾಗಿರುತ್ತದೆ.

It is reliably learnt that this letter has been created/fabricated on the 5th of June, with the same being back-dated as 4th June, 2025, as a cover-up, after the 11 deaths that had occurred on the 4th of June, between 3:45 PM and 5:15 PM.

A copy of the letter dated 4th June 2025 written by the Accused No.3, to the Accused No.7 CEO of KSCA, is enclosed herewith and marked as **DOCUMENT No.8.**

12. At around 11:20 AM on the 4th of June 2025, the 1st Accused **Sri. D.K. Shivakumar standing in front of the Civil Judges Court in Ramanagar**, made a public appeal, after mentioning that the RCB team was landing at the H.A.L. Airport, asking the RCB fans not to gather at the Airport, instead, straight away come to the Vidhana Soudha at 4 pm, where they will be honouring the players on the steps of Vidhana Soudha, **"after that all of you come to the Stadium".**

The video of the 1st Accused speaking from Ramanagar is available at:
<https://x.com/i/status/1930956470511972359>

A copy of the Snip Shot of a TV9 image, of the statement of the 1st Accused made at Ramanagar, is enclosed herewith and marked as **DOCUMENT No.9.**

13. At around 11:30 AM on the 4th of June 2025, on the instructions of the 1st Accused Sri. D.K.Shivakumar, the 3rd Accused **Smt. Sathyavathi** the Secretary – DPAR also **appeals to the general public and RCB fans saying,**

“kindly all the people of Karnataka and Bengaluru kindly go to the Stadium please. It is MY APPEAL”.

The Video widely published by the Media showing Sri. D.K. Shivakumar on the one side, appealing to the Public and on the other side, standing before the Vidhana Soudha Smt. Sathyavathi the Secretary – DPAR repeating the same appeal to the general public/RCB fans to come to the Stadium, is available on the following video link:

<https://x.com/i/status/1931237930309427652>

A Snap Shot picturising the 1st Accused and 3rd Accused in one frame is enclosed herewith and marked as **DOCUMENT No.10.**

14. From Ramanagar, the 1st Accused DCM Sri.D.K. Shivakumar the **ONLY DIGNITARY** (*who was already in an alleged negotiation to buy the RCB franchise*) goes to the H.A.L Airport to receive the RCB players. After receiving the IPL Team members at 03:15 PM, the **DCM travels to the Bengaluru CBD in his car holding a RCB flag, as if, he was leading HIS OWN TEAM**, (*Probably because he was allegedly in negotiation to buy the RCB franchise and confident that he will buy*) **home after a victory.**

The video of the 1st Accused receiving the RCB Players at the Airport and then travelling in his car holding the RCB Flag is available at: <https://www.facebook.com/share/r/18jXpL9ZCG/>

A Snap Shot of the 1st Accused receiving the RCB Players at the Airport and then travelling in his car holding the RCB Flag, is enclosed herewith and marked as **DOCUMENT No.11(a), (b), (c), (d) & (e).**

15. At 1:00 PM the Accused No.14 Home Minister Dr.Parameshwar declares that there will be **No Open Bus Victory Parade**. Allegedly after being told by the 7th Accused Commissioner of Police B.Dayanand that the 1st Accused D.K.Shivakumar has demanded that the Open Bus Victory Parade be cancelled, because he would like the Stadium to be overflowing when he (the DCM) goes there to felicitate the players.

A copy of the Tweet by the **Public TV at 1:00 PM** is enclosed herewith and marked as **DOCUMENT No.12.**

16. At 1:44 PM THE WEEK had published that there will **No open bus victory parade in Bengaluru: RCB to go directly to Chinnaswamy Stadium from Vidhana Soudha.**



By The Week News Desk Updated: June 04, 2025 13:44 IST

A copy of the Publication at 1:44 PM on the 4th of June by The Week News Desk, is enclosed herewith and marked as **DOCUMENT No13.**

17. Interestingly, by 1:46 PM on the 4th of June 2025, the 7th Accused Commissioner of Police **Mr.B.Dayanand, IPS, had also repeated the line of the 1st Accused D.K.Shivakumar had stated earlier from Ramanagar, which was also repeated earlier by the 3rd Accused Smt.Satyavathi, IAS**, by releasing a Traffic Advisory from the office of the Commissioner of Police, **mentioning ONLY THE FELICITATION programme that has been planned to be held AT THE CHINNASWAMY STADIUM AND AVOIDING the mention of the felicitation programme that was slated to be held on the Grand**

Steps of Vidhana Soudha on the same day, at 4.00 PM. Wherein the Accused No.13 the Chief Minister, along with other ministers, dignitaries and most importantly the Hon'ble Governor was slated to attend. The contents of the Advisory were:

"a felicitation ceremony has been organized by the KSCA at the Chinnaswamy Stadium at 5:00 PM today for all RCB players".

"Entry to the event will be permitted only to those with valid tickets and passes".

Interestingly the 1st Accused D.K.Shivakumar is alleged to have instructed the 7th Accused – The Commissioner to oppose and refuse granting permission for the earlier planned 2.5 kilometres "Open Bus Victory Parade". This allegedly was done because the 1st Accused D.K.Shivakumar did not want the crowd to disperse after seeing the players during the 'Open Bus Victory Parade' without coming to the Stadium, where he (DKS) was Planning to Personally felicitate the RCB players, for his Personal Publicity.

A Copy of the Traffic Advisory released by the 7th Accused Commissioner of Police, is enclosed herewith and marked as **DOCUMENT No.14 (a) & (b)**.

18. At around 2:24 PM Jun 4, 2025, the 14th Accused, by now a confused and **AN UNSURE Dr.G.Parameshwar**, the Home Minister (who is also bound by vicarious liability for the actions of the officers of his Home Department, along with the 15th Accused ASC Home department, Sri.Tushar Girinath) is seen making a statement before the media, saying, **that probably at 4 PM** a felicitation may be held at the Vidhana Soudha, on behalf of the Government, **I do not know what the exact details are**, about where the Chief Minister has decided to hold. I'll go and check with him, whether it is going to be on the Grand steps of Vidhana Soudha or the Stadium.

The video of the 14th Accused Home Minister speaking to the Media is available at: <https://x.com/i/status/1930186283395232174>

A Snap Shot Copy of the Home Minister speaking to the media, is enclosed herewith and marked as **DOCUMENT No.15**.

19. Even at around 2:24 PM Jun 4, 2025, there were Media reports that the **5th Accused Royal Challengers Bengaluru Team** (*Which A-1 D.K.Shivakumar was allegedly negotiating to buy*) **were supposed to conduct an 'Open Bus Victory Parade' from Vidhana Soudha to M. Chinnaswamy Stadium, a distance of roughly 2.5 km.**

The NDTV Sports Desk had published the same on the Net at 2:46 PM:

Jun 04, 2025 14:46 (IST)

RCB Victory Parade LIVE:

What was the itinerary?

As per reports, the Royal Challengers Bengaluru team were supposed to conduct an open bus parade from Vidhana Soudha to M. Chinnaswamy Stadium (a distance of roughly 2.5 km), basking in the joy of winning IPL 2025 and celebrating with its fans.

First, the players were expected to meet Karnataka Chief Minister Siddaramaiah and Deputy Chief Minister D. K. Shivakumar inside Vidhana Soudha. Then, following the bus parade, players were supposed to be felicitated and do victory laps inside the Chinnaswamy.

20. At around 2:46 PM Jun 4, 2025, the **News was public that**, the 5th Accused Royal Challengers Bengaluru will host Open-Bus Parade: **"RCB will host an Open-Bus Parade in Bengaluru!"**

The NDTV Sports Desk had published the same on the Net:

Jun 04, 2025 14:46 (IST)

RCB Victory Parade LIVE:

What was the itinerary?

As per reports, the Royal Challengers Bengaluru team were supposed to conduct an open bus parade from Vidhana Soudha to M. Chinnaswamy Stadium (a distance of roughly 2.5 km), basking in the joy of winning IPL 2025 and celebrating with its fans.

First, the players were expected to meet Karnataka Chief Minister Siddaramaiah and Deputy Chief Minister D. K. Shivakumar inside Vidhana Soudha. Then,

following the bus parade, players were supposed to be felicitated and do victory laps inside the Chinnaswamy.

21. At around 2:50 PM Jun 4, 2025, the 5th Accused Royal Challengers Bengaluru-RCB declared that **"RCB will host an Open-Bus Parade in Bengaluru!"** Followed by **another declaration** by the 5th Accused RCB at 3:14 PM, stating as follows:

1. **RCB Victory Parade: Today at 5 pm IST!!**
Victory Parade will be followed by **celebrations at the Chinnaswamy stadium.**
Free passes (limited entry) available on shop.royalchallengers.com.
2. **VICTORY PARADE FOLLOWED BY A GRAND CELEBRATION AT THE HOME OF CHAMPIONS. STARTING POINT: VIDHANA SOUDHA. ENDING POINT: CHINNASWAMY STADIUM.**
TIME: 5:00 PM – 6:00 PM
And,
3. **GET YOUR FREE VICTORY DAY PASSESS!**
ON SHOP.ROYALCHALLENGERS.COM
LIMITED PASSES ONLY, BOOK NOW.

A Copy of the Declaration by the 5th Accused RCB at 2:50 PM and at 3:14 PM is enclosed herewith and marked as **DOCUMENT No.16 and DOCUMENT No.17(a), (b) & (c) respectively.**

22. At around 3:24 PM Jun 4, 2025, the 13th Accused Chief Minister speaks to the media saying: **"There is a program today at 4 PM in Vidhana Soudha. I, along with the Governor and ministers, will participate in the program. This statement was published by the The NDTV Sports Desk on the Net:**

Jun 04, 2025 15:24 (IST)

RCB Victory Parade LIVE:

Karnatak CM speaks

On the occasion of RCB winning their first-ever IPL title, Karnataka Chief Minister Siddaramaiah has said the following regarding the celebrations planned: **"There is a program today at 4 PM in Vidhana Soudha. I, along with the Governor and ministers, will participate in the program."**

The 13th Accused Chief Minister at 3:51 PM posted the above statement on his X (former Twitter) Account.

A copy of the same is enclosed herewith and marked as **DOCUMENT No.18.**

23. The NDTV Sports Desk had published the following on the Net at 3:29 PM.

04, 2025 15:29 (IST)

RCB Victory Parade Live:

Team Reaches Taj Bengaluru

The RCB team has reached the Taj hotel in Bengaluru. The players will rest in the hotel for a little while before they reach the Vidhana Soudha to meet the Karnataka Chief Minister at 4:00 PM. The bus parade, at the moment, is being discussed.

24. The NDTV Sports Desk had published the following on the Net at 3:36PM:

Jun 04, 2025 15:36 (IST)

RCB Victory Celebrations Live:

RCB Confirm Victory Parade To

Start At 5:00 PM

RCB confirm victory procession to start at 5:00 PM today. Victory Parade will be followed by celebrations at the Chinnaswamy stadium. We request all fans to follow guidelines set by police and other authorities, so that everyone can enjoy the roadshow peacefully.

RCB Victory Parade:

Today at 5 pm IST.

Victory Parade will be followed by celebrations at the Chinnaswamy stadium.

We request all fans to follow guidelines set by police and other authorities, so that everyone can enjoy the roadshow peacefully.

Free passes (limited... pic.twitter.com/raJMXlop5O)

— Royal Challengers Bengaluru (@RCBTweets) June 4, 2025

25. **MOST VITAL AND CRUCIAL REVELATION:** When some of the down the line **officers of the jurisdictional police, who are not willing to reveal their identity AT THIS STAGE**, had allegedly contacted the 9th Accused Shekar H Tekkannavar the DCP (Central) over the Wireless Walkie-Talkie informing him of the uncontrollable situation outside the

Stadium AND seeking his intervention to get all the gates of the Stadium opened, to enable the crowd to enter through multiple entries, to ease out the concentration of the crowd at the ONLY 3 gates that were opened, it is reliably revealed that **the 9th Accused Shekar H Tekkannavar the DCP (Central) had asked them to call him on the Mobile Phone AND had allegedly told them that, he (DCP) was instructed directly by the 1st Accused D.K.Shivakumar himself, NOT TO OPEN all the gates, because he (DKS) wanted the presence of a huge crowd outside the Stadium, when he (DKS) arrives there.**

26. **Mr.Prajwal**, S/o. Ganesh, aged around 21 years, an engineering graduate and an employee at a private firm, a resident of Yelahanka New Town, Bengaluru, was allegedly **taken to the Vydehi Super Speciality Hospital at around 3:34 PM and declared dead at around 3:45 PM.**

As such, **Mr.Prajwal became the FIRST VICTIM of the 1st Accused D.K.Shivakumar's Craze and insistence for having large Crowds at the stadium, when he comes to the stadium, wherein for the first time he was allegedly Planning to Publicly Display and Disclose his association with the 5th Accused Royal Challengers Bengaluru. (a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy).** To have a huge crowd when he arrives at the Stadium, the 1st Accused is supposed have ordered the gates other than the three already opened, NOT TO BE OPENED TILL HE ARRIVES.

27. **Ms.Divyanshi**, D/o.Shivkumar, aged around 14 years, Resident of Kattigenahalli, (Kannur) Yelahanka, Bengaluru, a Class 9 standard student -schoolgirl, was allegedly **taken to the Bowring Hospital at around 4:07 PM and declared dead at around 4:15 PM.**

As such, **Ms.Divyanshi** had become the **SECOND VICTIM** of the **1st Accused D.K.Shivakumar's** Craze and insistence for having large **Crowds** at the stadium, when he comes to the stadium, wherein for the first time he was allegedly **Planning to Publicly Display and Disclose his association with the 5th Accused Royal Challengers Bengaluru.** *(a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy, already).* To have a huge crowd when he arrives at the Stadium, the **1st Accused** is supposed have ordered the gates other than the three already opened, **NOT TO BE OPENED TILL HE ARRIVES.**

28. At around 4:17 PM, on the 4th of June, 2025, **after 2 persons had already been killed in the stampede, the ANI News provider had reported** and published on the Social Media **that that the players of the 5th Accused Royal Challengers Bengaluru team will be arriving at the Vidhana Soudha,** where they will be felicitated by the Karnataka Government. The video uploaded by ANI News Service is available at: <https://x.com/i/status/1930214941245554939>

A Copy of the Picture and information posted on the Social Media by ANI on the 4th at 4:17 PM, is enclosed herewith and marked as **DOCUMENT No.19.**

29. Even at around 4:26 PM, on the 4th of June, 2025, **ANI News provider had reported** and published on the Social Media that that the players of the 5th Accused Royal Challengers Bengaluru team are to be felicitated by the Karnataka Government at Vidhana Soudha, displaying visuals of the preparations still in progress for the felicitation. The video uploaded by ANI News Service indicating that the RCB players had **NOT EVEN ARRIVED at the Vidhana Soudha at 4:26 PM, WHEN THERE HAS BEEN TWO DEATHS ALREADY NEAR THE STADIUM DUE TO THE STAMPEDE.** A video uploaded by the ANI News provider indicating

that the preparations were still on, before the RCB players arrived is available at: <https://x.com/i/status/1930214941245554939>

A Copy of the Picture and information posted on the Social Media by ANI on the 4th at 4:26 PM, is enclosed herewith and marked as **DOCUMENT No.20.**

30. **Sri.Manoj Kumar N.D**, S/o.Devaraj, aged around 19 years, was a college student and a Resident of Nagasandra Village, Tumkur, Manoj Kumar, a student at Presidency College in North Bengaluru, was allegedly taken **to the Bowring Hospital at around 3:35 PM** and **Declared Dead at around 4:27 PM.**

31. **Sri.Poorna Chandra**, S/o.R.B.Chandru, aged around 23 years, a Civil Engineer and a Resident of Rayasamudra, Mandya, was allegedly taken **to the Vydehi Super Speciality Hospital at around 4:20M** and **declared dead at around 4:34 PM.**

As such, **Sri.Manoj Kumar N. D** and **Sri. Poorna Chandra** had become the **THIRD & FOURTH VICTIMS** of the 1st Accused **D.K.Shivakumar's** Craze and insistence for having large Crowds at the stadium, when he comes to the stadium, wherein for the first time he was allegedly Planning to Publicly Display and Disclose his association with the 5th Accused **Royal Challengers Bengaluru.** (a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy). To have a huge crowd when he arrives at the Stadium, the 1st Accused is supposed have ordered the gates other than the three gates that were already opened, **NOT TO BE OPENED TILL HE ARRIVES.**

32. The NDTV Sports Desk had published the following on the Net at 4:37 PM Declaring that: **The Victory parade will start at Vidhana Soudha from 5 PM.**

Jun 04, 2025 16:37 (IST)

RCB Victory Celebrations Live:

All set for parade!

Victory parade will start at Vidhana Soudha from 5 PM, while the celebrations will begin at the M Chinnaswamy Stadium from 6 PM. The players will be felicitated at the stadium. From the roof of high court to the top of trees, RCB have covered all bases.

#RCBvsPBKS

RCB fans on top of Karnataka HIGH COURT building and trees nearby #RCBvsPBKS #IPLFinals #RCB #ViratKohli #victoryparade pic.twitter.com/LsnEDbr50Z

— INNOCENT EVIL ⁶ (@raju_innocentev) June 4, 2025

33. **Smt.Kamatchi (Devi)**, D/o. S.Moorthy, aged around 29 years, Resident of Udumalpet, Tiruppur, TN, an Amazon employee in Bengaluru, was allegedly taken **to the Bowring Hospital at around 4:05 PM and Declared Dead at around 4:40 PM.**

34. **Sri.Bhoomik**, S/o.Lakshman, aged around 19-year-old student, Resident of MS Ramiah Layout, Bengaluru, was allegedly taken **to the Vydehi Super Speciality Hospital at around 4:59 PM & Declared Brought Dead at around 4:59 PM.**

As such, **Smt.Kamatchi (Devi)** and **Sri.Bhoomik** had become the **FIFTH & SIXTH VICTIMS** of the 1st Accused D.K.Shivakumar's **Craze and insistence for having large Crowds at the stadium, when he comes to the stadium, wherein for the first time he was allegedly Planning to Publicly Display and Disclose his association with the 5th Accused Royal Challengers Bengaluru.** (a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy, already). To have a huge crowd when he arrives at the Stadium, the 1st Accused is

supposed have ordered the gates other than the three already opened, NOT TO BE OPENED TILL HE ARRIVES.

35. The NDTV Sports Desk had published the following on the Net at 4:57 PM Declaring that: **The parade bus and the team bus carrying the players have arrived at Vidhana Soudha. The victory parade will begin shortly.**

Jun 04, 2025 16:57 (IST)

RCB Victory Celebrations Live: Festivities to begin shortly!

RCB Victory Parade LIVE: 7 deaths feared

Some dreadful news is coming our way. A huge stampede seems to have taken place outside the M. Chinnaswamy Stadium in Bengaluru, with fans rushing to be at the event. Some deaths are feared to have occurred.

We urge everyone in Bengaluru to stay safe and away from the incident in this scenario.

36. **Smt.Chinmayi Shetty**, D/o. Karunakara Shetty, aged around 19-year-old student, Resident of Doddakallasandra, Bengaluru, was allegedly taken to **the Manipal (Vikram) Hospital at around 4:35 PM** and **Declared Dead at around 5:00 PM.**

As such, **Smt.Chinmayi Shetty** had become the **SEVENTH VICTIM of the 1st Accused D.K.Shivakumar's** Craze and insistence for **having large Crowds at the stadium, when he comes to the stadium, wherein for the first time he was allegedly Planning to Publicly Display and Disclose his association with the 5th Accused Royal Challengers Bengaluru.** *(a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy, already).* To have a huge crowd when he arrives at the Stadium, the 1st Accused is supposed have ordered the gates other than the three already opened, NOT TO BE OPENED TILL HE ARRIVES.

37. At around 5:06 PM, on the 4th of June, 2025, **India Today** had started publishing pictures of the **felicitation that had started at the Vidhana Soudha**, wherein it is once again the prominence that the 1st Accused D.K.Shivakumar had ensured for himself, to be at a felicitation for the players of the 5th Accused RCB (*a franchise which he is believed to have been negotiation to buy, already*). **At a time when SEVEN innocent people had already lost their lives, due to the stampede near the Stadium**, which was allegedly caused by the 1st Accused **D.K.Shivakumar's Craze for having large Crowds at the stadium**, wherein for the first time he was allegedly **Planning to Publicly Display and Disclose his association with the 5th Accused Royal Challengers Bengaluru**. And most importantly after he himself, with the intention of having a huge crowd when he arrives at the Stadium, is supposed to have ordered the gates other than the three already opened, **NOT TO BE OPENED TILL HE ARRIVES**.

A Copy of the Pictures posted by INDIA TODAT at 5:06 PM, are enclosed herewith and marked as **DOCUMENT No.21 (a) & (b)**.

38. **Ms.Sahana Rajesh**, D/o.Rajesh, aged around 23 years, Native and Resident of Kolar, a software developer & Bosch employee, was allegedly taken to **the Vydehi Super Speciality Hospital at around 4:32 PM and Declared Dead at around 5:07 PM**.

39. **Sri.Shiva Linga C**, S/o.Chandappa, aged around 17-year-old Student, Resident of Honigere, Yadgir, was allegedly taken **to the Bowring Hospital at around 4:35 PM and Declared Dead at around 5:08 PM**.

40. **Sri.Shravana K.T**, S/o.Sridhar, aged around 20 years, was a student, Resident of Kurutahalli, Chickaballapur, was allegedly taken

to the Bowring Hospital at around 4:40 PM and Declared Dead at around 5:10 PM.

41. **Mrs.Akshata Pai**, W/o.Ashay Ranjani, aged around 26 years, a chartered accountant & Resident of Ravindra Nagar, Uttara Kannada, was allegedly taken to the Bowring Hospital at around 4:45 PM and Declared Dead at around 5:15 PM.

As such, **Ms.Sahana Rajesh**, **Sri.Shiva Linga C**, **Sri.Shravana K.T** and **Mrs.Akshata Pai** had become the EIGHTH, NINTH, TENTH and ELEVENTH VICTIMS of the 1st Accused **D.K.Shivakumar's** Craze and insistence for having large Crowds at the stadium, when he comes to the stadium, wherein for the first time he was allegedly Planning to Publicly Display and Disclose his association with the 5th Accused **Royal Challengers Bengaluru**. *(a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy, already)*. To have a huge crowd when he arrives at the Stadium, the 1st Accused is supposed have ordered the gates other than the three already opened, NOT TO BE OPENED TILL HE ARRIVES.

42. The NDTV Sports Desk had published the following on the Net at 5:42 PM Declaring that: **The parade bus and the team bus carrying the players have reached the Chinnaswamy stadium**. While the Media was still awaiting confirmation regarding the safety of people in Bengaluru, in reference with the stampede that had already begun a long time ago.

Jun 04, 2025 17:42 (IST)

RCB Victory Parade LIVE:

Players reach Chinnaswamy

While we await confirmation regarding the safety of people in Bengaluru, the players have reached the stadium and are flaunting the golden IPL trophy

to a packed M. Chinnaswamy crowd. Celebrations are underway inside the stadium.

43. The 13th Accused Chief Minister, Sri.Siddaramiah makes a statement that he got the information regarding the deaths at 5:45 PM, ***"Deaths at 3:50 pm, I got information at 5:45': Siddaramiah on why RCB felicitation event continued despite stampede; says I went as invitee'."*** Clearly demonstrating his callousness in having any control over the entire affairs, which was being conducted at the command of the 1st Accused DCM. The said submission is an acceptance of an act of dereliction of duty, on the part of the 13th Accused, Chief Minister of the State of Karnataka, which has culminated in the death of 11 innocent citizens of this country.

44. The above Statement of the 13th Accused Chief Minister does not absolve him *(or the Home Minister Sri.Dr.Parameshwar, Home Secretary and ACS Sri.Tushar Girinath, Chief Secretary Smt.Shalini Rajaneesh and the Police Commissioner Sri.B.Dayanand)* of the vicarious liability he (they) is/are legally bound by, because he had a legal duty as the Chief Minister to exercise reasonable care, but failed to do so (breached that duty), and that this breach has directly caused harm to several innocent people and the Punishment for vicarious liability involves the same penalties that would be applied to the individuals who have directly and Collectively Committed acts of Criminal Negligence, Willful dereliction of duty, Acts endangering life & personal safety of others, Causing death by negligence amounting to Culpable homicide, etc., which would attract prosecution leading to punishment Under Section 106, 100, 105, 125, 115(2), 316(5), 337, 255, 318, 340(2) Read With Section 3(5) & 61(2) and other applicable sections of the Bharatiya Nyaya Sanhita, 2023.

The copy of the statement of the 13th Accused CM published by **by the TIMES OF INDIA** is enclosed herewith and marked as **DOCUMENT No.22.**

45. The NDTV Sports Desk had published the following on the Net at 5:49 PM speaking about the stampede, that had already caused the death of around FOUR People:

Jun 04, 2025 17:49 (IST)

RCB Victory Parade LIVE:

Update on the stampede

We continue to await more confirmation regarding the stampede that has taken place outside the M. Chinnaswamy Stadium. However, here's what we know so far. Visuals showed police shifting injured and unconscious people to a nearby hospital. Many people who came to watch the celebrations fainted amid the stampede, eyewitnesses said.

Karnataka Deputy Chief Minister DK Shivakumar said the crowd was "uncontrollable". "I apologise for the overcrowding," Mr Shivakumar said.

(a) By the time of the above publication at 5:49 PM, around 11 persons had already died, the 1st Accused **D.K.Shivakumar without referring to the death of the 11 innocent persons, is seen saying, the crowd was "Uncontrollable".** This is after he had **very meticulously manipulated the cancellation of the 2.5 Kilometres "Open Bus Victory Parade" that was planned, with the help of the 7th Accused Commissioner of Police.**

(b) The **"Open Bus Victory Parade"** if was allowed as per earlier plans, **would have drastically reduced the crowd at the stadium, as the crowd would have been spread out along the 2.5 km route and those who saw the players would have dispersed from there itself, without rushing to the Stadium,** which would have not resulted in the stampede, causing the unfortunate death of 11 innocent fans of RCB, in the bargain. Interestingly, at 5:49 PM the 1st Accused

D.K.Shivakumar without referring to DEATH of 11 innocent persons, caused by the overcrowding since 3:45 PM itself, is saying "I apologise for the overcrowding," BUT NOT FOR THE DEATH OF 11 INNOCENT PEOPLE or the injuries caused to over 56 people, at 5:49 PM.

46. The NDTV Sports Desk had published the following on the Net at 6:08 PM:

Jun 04, 2025 18:08 (IST)

RCB Victory Parade LIVE:

Virat Kohli, RCB enter pitch

The Royal Challengers Bengaluru players have entered the ground. The players are posing to the camera. Virat Kohli, Jitesh Sharma, Rajat Patidar and co. are present. Karnataka Deputy CM DK Shivakumar is present too.

And now Virat Kohli will address the Chinnaswamy crowd. He is in good spirits.

It is evident from the above that the 1st Accused **D.K.Shivakumar was unmindful of the fact that 11 innocent people have died due to the stampede**, that was caused by the overcrowding, which was orchestrated by the 1st Accused D.K.Shivakumar himself, **with the help and active connivance of the 11th, 10th, 9th, 8th, 7th, 6th, 5th and 4th Accused persons AND the passive support, inaction, non-interference and concurrence of the 13th, 14th, 15th, 2nd and 3rd Accused persons, and not being bothered that the NUMBER OF DEATHS HAD ALREADY CROSSED ELEVEN by then, and scores of people injured, is seen present at the celebrations inside the stadium**, where the players were posing for pictures.

47. At around 6:30 PM, on the 4th of June, 2025, The TIMES OF INDIA declared that at least 7 people were dead already, and that 25 others were hurt in the stampede near Chinnaswamy stadium during the RCB felicitation ceremony.

Factually by that time 11 people had already died before 5:15 PM itself.

A Copy of the Picture posted by the TIMES OF INDIA at 6:30 PM, are enclosed herewith and marked as **DOCUMENT No.23**.

48. At around 6:35 PM, on the 4th of June, 2025, it is revealed on the Social Media – including pictures from NDTV, that **8 fans of the 5th Accused RCB had already been killed in the Stampede**.

Factually by that time (6:35 PM) 11 innocent people had lost their precious lives.

And that the 1st Accused **D.K.Shivakumar** knowing lied in public by **MAKING A FALSE CLAIM: “Had arranged 5,000 personal. Can’t use lathi on young vibrant crowd”**. While in the High Court, the state government said that **ONLY 1,318 Bengaluru police personnel were deployed for security**. Not clarifying if it was for both the events at the Vidhana Soudha and the Stadium together.

Especially after he had directly instructed the 9th Accused DCP, NOT TO OPEN all the gates, because he (DKS) wanted the presence of a huge crowd outside the Stadium, when he (DKS) arrives there. A selfish act by the 1st Accused that finally led to the death of 11 innocent young citizens of this country.

A Copy of the Picture Published along with the declaration that 8 persons had been killed, are enclosed herewith and marked as **DOCUMENT No.24**.

49. The NDTV Sports Desk had published the following on the Net at 6:46 PM:

Jun 04, 2025 18:46 (IST)

RCB Victory Parade LIVE:

Programme shortened

DK Shivakumar, Deputy CM of Karnataka, mentions that the RCB celebration programme was shortened following the events and stampede that took place outside the M. Chinnaswamy Stadium. Here's what he said: "I have spoken to the Police Commissioner. I will also go to the hospital later. I do not want to disturb the doctors who are taking care of the patients. The exact number cannot be told now. We appeal to the people to remain calm. We shortened the programme; it ended within 10 minutes... Lakhs of people came."

The first death due to the stampede was allegedly at 3:45 PM and the eleventh death occurred at 5:15 PM and the 1st Accused D.K.Shivakumar comes to the stadium at around 5:03 PM, by which time SEVEN persons have already been killed (*which was brought to his notice before entering the Stadium*) and at 6:35 PM Sri.D.K.Shivakumar says that, "the RCB celebration programme was shortened following the events and stampede that took place outside the M. Chinnaswamy Stadium", although he was celebrating inside the Stadium even after all the ELEVEN persons had been killed, and he had absolute knowledge about the deaths.

A Copy of the Picture showing the 1st Accused celebrating with the cup even after the death of 11 persons, are enclosed herewith and marked as **DOCUMENT No.25 (a) & (b)**.

50. CRUCIAL, CRITICAL AND COLLECTIVE CRIMINAL ACTS THAT SPECIFICALLY LED TO THE CRIMINAL HOMICIDE OF 11 PERSONS:

Firstly, the invitation and publicity given by the 5th Accused RCB, the 4th Accused KSCA, the 6th Accused DNA, the 1st Accused D.K.Shivakumar, the 3rd Accused Smt.Satyathi and the 7th Accused Commissioner of Police Sri.B.Dayanand in particular and other, who with their communication specifically encouraged the public/fans to converge at the Stadium for the felicitation, without bothering to properly prepare for the event, without any real-time monitoring of the crowd flow, without drawing any bandobast scheme, without adequate arrangements and precautionary measures for emergency response,

amounting to criminal negligence causing the death of 11 innocent youngsters and injuring more than 56 people, are reasons which need investigation.

Secondly, the cancellation of the earlier planned 2.5 kilometres "Open Bus Victory Parade" by the 7th Accused Commissioner of Police B.Dayanand, under instructions from the 1st Accused D.K.Shivakumar who did not want the crowd to disperse after seeing the players on the Victory Parade Route, after which he knew the crowd would have returned without going to the Stadium, where he (DKS) was planning to felicitate the RCB players. *(a franchise which Sri. D.K.Shivakumar is believed to have been negotiation to buy)* on the pretext of the request by the 5th and 6th Accused KSCA and DNA respectively, amounting to voluntarily causing hurt, endangering life and safety of the people, causing the death of 11 innocent youngsters and injuring more than 56 people by deliberate criminal negligence, are reasons which need investigation.

Thirdly, the act of opening Only 3 out of 22 gates and deliberately keeping the additional 19 gates closed by the 4th Accused KSCA, and 6th Accused DNA, even after the crowd started surging and had become unmanageable, at the Chinnaswamy Stadium, and intentional refusal of the 11th Accused Inspector of Police A.K.Girish, 10th Accused ACP, C.Balakrishna, 9th Accused DCP Shekar H Tekkannavar, 8th Accused Addl.CP Vikash Kumar Vikash and the 7th Accused B.Dayanand, to open the additional gates, out of fear and obedience to the 1st Accused D.K.Shivakumar, who wanted the presence of a huge crowd outside the Stadium, when he (DKS) arrives there, amounting to voluntarily causing death by negligence, endangering life and safety of the people, culpable homicide by negligence in public duty, conspiracy to commit offence, endangering public safety, public servant disobeying law, with intent to

cause injury leading to the death of 11 innocent youngsters and injuring more than 56 people, are reasons which need investigation

51. **MOST IMPORTANT REVELATION:** When **some lower rung officers of the jurisdictional police, who are not willing to reveal their identity AT THIS STAGE**, had allegedly contacted the **9th Accused Shekar.H.Tekkannavar**-the DCP (*Central*) informing him of the uncontrollable situation outside the Stadium AND tried to seek his intervention to get all the gates of the Stadium opened, to enable the crowd to enter through multiple entries, to ease out the concentration of the crowd from the **ONLY 2 gates** that were opened, it is reliably revealed that **the 9th Accused Shekar H Tekkannavar the DCP (Central) had allegedly told them that, he (DCP) was instructed directly by the 1st Accused D.K.Shivakumar himself, not to open all the gates, because he (DKS) wanted the presence of a huge crowd outside the Stadium, when he (DKS) arrives there.**

52. The NDTV Sports Desk had published the following on the Net at 6:50 PM:

Jun 04, 2025 18:50 (IST)

RCB Victory Parade LIVE:

RCB pose with the trophy

Visuals emerging from the Chinnaswamy of RCB players celebrating and posing with the trophy.

53. After all the chaos and criminal negligence that caused the death of 11 people and injured around 56 persons, at around 7:05 PM on the 4th of June 2025, the **5th Accused RCB** makes the most ridiculous and callous statement, saying: "**Fans have waited 18 years for this Cup. We need to empathise with them for their vulnerability.**"

Jun 04, 2025 19:05 (IST)

RCB Victory Parade LIVE:

RCB speak on stampede

JUST IN: An RCB spokesperson has released a statement to PTI regarding the stampede that occurred outside the Chinnaswamy Stadium this afternoon:

"Fans have waited 18 years for this Cup. We need to empathise with them for their vulnerability."

Brief Summary:

1. **Premature Announcement by KSCA, DNA & RCB:** On 03.06.2025, the Karnataka State Cricket Association (KSCA), on behalf of DNA Entertainment Networks Pvt. Ltd. ("DNA"), submitted a representation to the ACP, Cubbon Park Police Station, announcing a victory parade for RCB **without seeking any formal police permission**. Notably, there are alleged financial links of the Chief secretary Ms. Shalini Rajneesh's brother with DNA, indicating a conflict of interest and potential abuse of official position.
2. **Lack of Official Sanction:** Despite no formal consent and approval from the Chief Minister's office as of 11:30 AM on 04.06.2025, preparations commenced on the night of 03.06.2025, including unauthorised construction of a stage at the steps of Vidhana Soudha—a high-security zone.
3. **Unauthorized Expansion of Facilities:** Ms. Shalini Rajneesh personally visited the venue and had allegedly directed an increase in seating from 25 to 100 persons on the grand steps of Vidhana Soudha, without fitness or safety clearances from PWD, Fire force or other competent authorities.
4. **Misuse and misappropriation of Government Funds:** Despite the event being a private initiative of KSCA and DNA, the Chief Secretary had allegedly insisted that the entire expenditure be borne by the State Government, indicating clear financial misappropriation by a public servant for personal gain.
5. **Financial Interest, Greed, Craving for Publicity and Political Milage, cause of Misery:** Mr. D.K. shivakumar's alleged interest in the purchase of the RCB franchise and his obsession for publicity, took a toll on 11 innocent lives, who were a part of the crowd that were mobilised by personal Appeals, Messages, Advisories by himself, RCB, KSCA, Ms. Satyavathi and the Commissioner of Police to converge at the Stadium.
5. **Commissioner's Complicity and Inaction:** Mr. Dayanand failed to take proactive steps after receiving the KSCA-DNA letter on 03.06.2025. **The permissions were NOT formally denied**, and no

security measures were put in place for crowd management, at the Stadium, after cancelling the 2.5 Kms "Open Bus Victory Parade" at the behest of the DCM-D.K.Shivakumar, and also informing the public (RCB Fans) to head towards the Stadium, which caused the stampede.

6. **Post-Event Forgery of Police Clearance:** After the stampede occurred, a backdated clearance letter dated 04.06.2025 was allegedly fabricated under pressure and collusion among the above-named officials. This is supported by communication between The Chief Secretary and the DPAR Secretary on one hand and DCP Vidhan Soudha Security and Commissioner of Police on the other hand and the same needs thorough investigation. Allegedly the permission to conduct the felicitation at Grand Steps of Vidhan Soudha is an issued one day post death of 11 innocent people i.e., on 5th June 2025 incorporating the date on the permission letter as 4th June, 2025. This is just an heinous and insensitive attempt to save personal skin and put the blame on others by Smt Shalini Rajnish -Chief Secretary, Satyavathi-Secretary DPAR, Dayanand-Police Commissioner and connected officials, at the instance of.

8. **Suppression of Casualty Information:** The first death was reported by the media at approximately 3:45 PM on 04.06.2025, yet the event at Vidhan Soudha and Stadium were allowed to continue even post 4:53 PM. Neither the CM nor DyCM nor the Home Minister were informed, reflecting criminal concealment and administrative collapse.

9. **Fabricated Orders & Pre-emptive Actions:** The RCB team announced the route at 7:15 AM, and road barricading commenced even before the alleged police clearance, indicating pre-planned and unauthorised execution.

10. **Stampede Due to Gate Mismanagement, Police inaction to Prevent or Protect Innocent lives:** Only 3 out of 22 gates at Chinnaswamy Stadium were opened as the crowd surged, resulting in a deadly stampede. There was no real-time monitoring or emergency response by the authorities or organisers. **The adherence to the alleged instruction given by the 1st Accused D.K.Shivakumar to the 9th Accused Shekar H.Tekkannavar, which was allegedly communicated to and followed by the C.P-B.Dayanand, Addl. C.P (West) Vikash Kumar Vikash, ACP-C.Balakrishna and Inspector of Police Cubbon Park-A.K.Girish, to avoid opening extra gates, and to keep the gates closed even when people were dying due to stampede, as the DCM-D.K.Shivakumar desired to have a huge crowd outside the Stadium when he comes there, amounts to willful negligence causing deaths.**

11. **Clear Conflict of Interest & Collusion:** The unauthorised coordination between Ms. Shalini Rajneesh, Ms. Satyavathi, KSCA, DNA Company, and senior police officials, amounts to collusion for personal and financial benefit, bypassing every statutory and administrative safeguard.

12. **Forgery and Misuse of Authority:** All the above actions point to forgery, fabrication, dereliction of duty, criminal conspiracy, and gross negligence, directly resulting in the deaths and injuries.

I undertake to cooperate fully with the investigation and provide any material evidence or testimony required.

Wherefore, it is requested of your good office to kindly register a FIR against all the **Public Servants identified by name in this Complaint**, at various stages, along with **Public Servants identified by their designations** and also **the Private individuals identified by name and otherwise** under **Section 100** - for Culpable homicide **Section 105** - Punishment for culpable homicide not amounting to murder, **Section 125(a) & (b)** - Act endangering life or personal safety of others, **Section - 115(2)** - Voluntarily causing hurt, **Section 316** - Criminal breach of trust, **Section 316(5)** - punishment for criminal breach of trust, **Section 335** - Making a false document, **Section 340** - Forged document or electronic record, **Section 337** - Forgery of important public records and official documents, **Section 255** - Public servant Disobeying direction of law, **Section 318** - Cheating **Section 340(2)** - Fabrication of false evidence **Read With Section 3(5) & 61(2)** and other applicable sections of the **Bharatiya Nyaya Sanhita, 2023**.



Abraham T.J

President.

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