



**FIRST INFORMATION REPORT**  
(Under Section 154 and 157 Cr.P.C)

A.P.P.M. Orders 470,500

1. District : Cyberabad P.S : Madhapur (Guttala) Year : 2019 FIR No. 278/2019 Date : 12/04/2019

2. Acts & Section(s) : 37,38(a)(b)(g),40,42,44 Aadhar Act-2016

3. a) Occurrence of Offence : Day : \_\_\_\_\_ Date & Time From : \_\_\_\_\_

**Prior To :**

Date & Time To : \_\_\_\_\_ 02/03/2019 18:15 Time Period : \_\_\_\_\_

b) Information Received at P.S. : Date & Time : 12/04/2019 18:15

c) General Diary Reference: Entry No : 31 Date & Time : 12/04/2019 18:15

4. Type of Information : Written

5. Place of Occurrence:

a) Distance and Direction From P.S. : 3km,North-West Beat No. : \_\_\_\_\_

b) Address Place : \_\_\_\_\_ Area/Mandal : \_\_\_\_\_ Street/Village : \_\_\_\_\_

Plot No. 538, 5th Floor, Krishna Heights, Ayyappa Society, Khanamet, Madhapur, Hyderabad, Telangan Serilingampally

City/District : Cyberabad State : Telangana PIN : \_\_\_\_\_

c) In case , outside the limit of this Police Station, then

Name of P.S. : \_\_\_\_\_ District : \_\_\_\_\_

6. Complainant / Informant :

a) Name : Sri Sri T Bhavani Prasad, Deputy Director of Aadhar.

b) Father's / Husband's Name : \_\_\_\_\_

c) Date/Year of Birth : \_\_\_\_\_ Age : \_\_\_\_\_ Caste : \_\_\_\_\_

d) Nationality : \_\_\_\_\_

f) Passport No : \_\_\_\_\_ Date of issue : \_\_\_\_\_ Place of issue : \_\_\_\_\_

g) Occupation : \_\_\_\_\_ 9849710030 Mobile No : \_\_\_\_\_

h) Address House No : \_\_\_\_\_ Area/Mandal : \_\_\_\_\_ Street/Village : \_\_\_\_\_

H.No. C-32-2, LAB, Quarters, DRDO Township, Khairathabad, Hyderabad. Hyderabad No Ward

City/District : Hyderabad State : Telangana PIN : \_\_\_\_\_

7. Details of known/suspected/unknown accused with full particulars :

Serial No : 1

a) Name : Management of Ms IT GRIDS India Pvt Ltd and others

b) Father's /Husband's Name : \_\_\_\_\_ c) Occupation : \_\_\_\_\_

d) Caste : \_\_\_\_\_ e) Gender : \_\_\_\_\_ f) Age : \_\_\_\_\_ Nationality : \_\_\_\_\_

g) Address House No : \_\_\_\_\_ Street/Village : \_\_\_\_\_ Area/Mandal : \_\_\_\_\_

Management of M/s IT GRIDS (India) Pvt Ltd, Krishna Heights, Ayyappa Society, Hyderabad Serilingampally

City/District : \_\_\_\_\_ State : Telangana PIN : \_\_\_\_\_

h) Phone(Off) : 0 Phone(Resi) : 0 Cell No : 0

i) Email : \_\_\_\_\_

Physical features, deformities and other details of the Suspect :

S. No	Sex	Date/Year of Birth	Build	Height (cms)	Complexion	Identification Marks(s)
1	2	3	4	5	6	7
1		DOB/AGE:0		0cm		

Deformalities/ Peculiarities	Teeth	Hair	Eyes	Habbit(s)	Dress Habit(s)	Languages/ Dialect
8	9	10	11	12	13	14

Place Of				
Burn Mark	Leucoderma	Mole	Scar	Tattoo
15	16	17	18	19

8. Reasons for delay in reporting by the complainant / informant :

delay due to the complainant for through research as specified in the enclosures

9. Particulars of properties stolen/involved (Attach separate sheet, if necessary) :

10. Total value of property stolen :

11. Inquest Report/ U.D. Case No. if any :

12. Contents of the complaint / statement of the complainant or informant :

**IN THE COURT OF HONORABLE XII ADL. METROPOLITAN MAGISTRATE, KUKATPALLY, CYBERABAD.**

Honored sir,

Today, i.e., on 12.04.2019 at 1815 hours received a complaint from Sri T Bhavani Prasad, Deputy Director of Aadhar, R/o H.No. C-32-2, LAB Quarters, DRDO, Township, Khairathabad, Hyderabad. Cell No. 9849710030. Which reads as follows.

Facts of the case are that the The complainant has received a communication dated 15.03.19 from IG of Police, West Zone, Hyderabad, the communication states as follows, that on the complaint of Sri Lokeswara Reddy, R/o Hyderabad about the illegal access and fraudulent use of sensitive identity information such as Aadhaar Number Voter Identity details including color photographs, beneficiary details of various Government Schemes and the data related to surveys conducted by the Government of Andhra Pradesh were misused by IT GRIDS (INDIA) Pvt Ltd., Hyderabad through "Seva Mitra Application" a case was registered on 02.03.2019 and the same is now being investigated into by Special Investigation Team, investigation so far revealed that Seva Mitra Application is suspected to be using stolen voter information along with Aadhaar data of the State Governments of Telangana and Andhra Pradesh for voter profiling, targeted campaigning and even deletion of votes. During the course of investigation, search was conducted in the premises of IT GRIDS (INDIA) Pvt Ltd., on 02/03/2019 & 03/03/2019, 7 Hard Disks and other digital evidence were seized from the scene of crime. The seized digital evidence was sent to Telangana State Forensic Science Laboratory (TSFSL) for forensic examination. TSFSL in its preliminary report has stated that "data related is huge in the material objects and requires extensive analysis". Moreover the report of TSFSL, has categorically stated that the seized Hard Disks contain a database of a large number of records pertaining to Aadhaar number in a particular structural database. Strengthening the suspicion, upon further examination of the digital evidence it was discovered that a whopping 78221397 records of Aadhaar data belonging to the states of Telangana and Andhra Pradesh were found and used by IT GRIDS (INDIA) Pvt Ltd., for the purpose of Seva Mitra Application belonging to Telugu Desam Party. Further, it is also pertinent to bring it to your notice that the structure and size of the database is surprisingly similar to that of databases that could have been originally owned by Unique Identification Authority of India.

In the course of Investigation, records of the following five persons

- Muddanalaligari Jayamohan Reddy (Aadhaar No. XXXX XXXX3340)
- Akkala Maddileti Reddy (Aadhaar No XXXX XXXX8414)
- Akula Ravi Kumar (Aadhaar No. XXXX XXXX7063)
- Abdas Venkata Pratap (Aadhaar No. XXXX XXXX8041)
- Complainant: Thummala Lokeswara Reddy (Aadhaar No. EGO ( XXXX1523)

furnished by the complainant were verified by TSFSL and records of above five members were found in the seized hard disks having following fields

1) UID\_NUM, 2) EID\_NUM, 3) CITIZEN\_NAME, 4) FATHER\_HUSBAND\_GUARDIAN\_NAME, 5) DOB\_DT, 6) VILLAGE NAME, 7) MANDAL NAME, 8) DISTRICT\_ID, 9) DISTRICT NAME, 10) PIN CODE, 11) VTC\_CODE, 12) VTC\_NAME, 13) CITIZEN\_PHONE NO, 14) GENDER, 15) STATECODE, 16) STATENAME, 17) CITIZEN\_NAME\_LOCAL, 18) CAREOF\_NAME\_Local. The presence of HID\_NUM raises a strong suspicion that the data could have been obtained either from Central Identities Data Repository (CIDR) or one of the State Resident Data Hubs (SRDH) aligned to C1DR. Availability of such unique information of an Aadhaar Number indicates that the accused in the case might have illegally accessed CIDR or SRDH and has used such information or data for wrongful gain. The accused is in possession of such a sensitive database in a removable storage, which is in contravention of Section 38(g), Section 38(h) of Aadhaar (Targeted Delivery of Financial and other Subsidies, benefits and services) Act, 2016, Section 40 and Section 42 of Aadhaar Act, 2016. Further, it is strongly believed that Identity Information related to Aadhaar is being used by the accused, who is Director of 1T GRIDS (INDIA) Pvt Ltd., for the purpose of mapping of voters with beneficiaries of various Government Schemes and results of surveys conducted by the Government in contravention. Moreover, illegal access and

possession of sensitive identity information of Aadhaar with a private entity is in violation of Sec 72(A), Section 65 and Sec 66(8) of IT Act, 2008. As per Aadhaar Regulations, 2016, there are stringent restrictions on sharing, circulating or publishing of Aadhaar Number. However, the Directors of IT Grids (INDIA) Pvt Ltd., are suspected to have hosted databases related to Aadhaar number and related identity information in Amazon Web Services, which is in clear contravention of above mentioned regulations. The evidence gathered so far points to the fact that the accused has hosted the Aadhaar database in Amazon Web Services, USA in contravention of Section 44 of Aadhaar Act, 2016. Further, it is strongly suspected that the accused could have illegally stored Aadhaar database of not only Telangana and Andhra Pradesh but possibly of few other States in a off shore storage facility. There is every possibility that sensitive data of Indian citizens could be accessed and used by countries hostile to India or International organized crime syndicates in a manner which could seriously be detrimental to National Security. In light of gravity of the offences committed by the accused, it is felt that complaints filed by individual residents that their Aadhaar data is being misused will not suffice as UIDAI is the ultimate custodian of all Aadhaar related data and Sec 44 of Aadhaar Act 2016 applies to offences occurring outside India. In light of facts stated above, an FIR may kindly be registered at the earliest against the suspects and further necessary legal action may be initiated under the relevant provisions of the law. Hence FIR.

Received on 12.04.2019 at 1815 hrs.

As per the contents of the above written English complaint, I registered a case in Cr. No. 278/2019, U/S. 37, 38(a), (b), (g), 40, 42 and 44 of Aadhaar Act-2016 and took up the investigation.

**13. Action taken:**

Since The above information reveals commission of offence(s) U/s as mentioned at item No : 2

1) Registered the case and took up the investigation or : Name : Y Nageswar Rao

2) Directed to take up the Investigation or Rank : Inspector

3) Refused investigation due to : \_\_\_\_\_

4) Transferred to P.S : \_\_\_\_\_ District : \_\_\_\_\_ on point of jurisdiction.

F.I.R. read over to the complainant / informant, admitted to be correctly recorded and

a copy given to the complainant /informant, free of cost.

R.O.A.C

**14.**

Signature / Thumb impression of the complainant / informant.

Signature of Officer in charge, Police Station

Name : Y Nageswar Rao

Rank : Inspector

15. Date and time of dispatch to the court : \_\_\_\_\_

