

In the Court of XLIX Additional City Civil & Sessions Judge
[Special Court for trial of NIA Cases], Bengaluru

Spl.C.187/2024

WITNESS FOR PROSECUTION

Duly sworn on 04.06.2026

PW.5 / CW.11

Deposition of	:	Sri. Naveen
Father's name	:	Sri. Narayan
Age	:	37 years
Occupation	:	Operation Manager, Enabler Property Service Private Limited.
Residence	:	Dodda Kannali, Sarjapura Road, Bengaluru

EXAMINATION-IN-CHIEF BY THE LEARNED SPECIAL P.P:-

1. From 2012 to 2022 I worked as a Operation Manager, in Enabler Property Service Private Limited. The office of the said Enabler Property Service Private Limited was located in Geetanjali Layout near HAL. The said company has 23 branches. The said company offers services in the house keeping. About 80 persons were working in each branch of our company. The total number of workers and staff was about 500-700.
2. I know Ramaswamy. Said Ramaswamy was working as a field officer in our company i.e., Enabler Property Service Private Limited. In the year 2018 Ferdous was recruited as a janitor by our field officer Ramaswamy. Said Ferdous told us that he was from Culcutta. At that time the salary of said Ferdous was Rs.9,000/- per month. The said salary was paid in cash to Ferdous. During COVID-19, the salary of the workers was paid through their respective bank accounts.

3. While attending his work in the basement of the office building, said Ferdous got injured in his leg. Then said Ferdous left the said job.
4. I know Srinivas Reddy who is friend of my father. Said Srinivas Reddy owned 10 guntas of land at Devarabeesanahalli near Ecospace Company. I asked said Srinivas Reddy to let out his said land for stay of laborers of our company. Ferdous told me that he would supply the workers to the company and requested me to provide some vacant space for his stay. I had Srinivas Reddy let out his land to Ferdous on monthly rent of Rs.40,000/-. Ferdous paid advance amount of Rs.60,000/- to Srinivas Reddy towards the said transaction. The rent agreement was executed between Ferdous, Alamin and Srinivas Reddy. In the said land Tin sheds were constructed by Ferdous and his associates. Our company appointed said Ferdous as care taker of the said land and Tin sheds. Said Ferdous was incharge of water supply, pest control, drainage cleaning, drinking water supply in the said land and the sheds therein.
5. Salary of Rs.15,000/- per month was paid to Ferdous by our company for the job of care taking in the said land. Our company used to collect Rs.1,500/- for each shed per month from those who stayed in the sheds situated in the above said land. At the time of appointment for job in our company, Aadhaar cards, Passport size photograph were collected. In the shed Ferdous stayed with his family members.
6. For three days Ferdous was not noticed in the shed. Then I came to know that NIA officers took Ferdous to NIA office as said Ferdous

belongs to Bangladesh. Then I went to shed of Ferdous and enquired his wife by name Nupur and when our field officer Ramaswamy and I checked the shed of Ferdous, Passport of Bangladesh, a card of Bangladesh and old photographs were found. We took the xerox copies of the said documents and handed over the said xerox copies to our office informing our office about the same.

7. NIA officer summoned me to Madiwala NIA office. I gave xerox copies of Passport of Bangladesh, a card of Bangladesh and old photographs to the NIA officer. The NIA officer obtained my signature. Witness identifies production cum seizure memo dated 21.11.2023 and his signature on it. Hence, production cum seizure memo dated 21.11.2023 is marked as **Ex.P.21** and signature of the witness on it is marked as **Ex.P.21(a)**. Now I can identify the documents provided by me to the NIA officer. Witness identifies the xerox copy of Passport of Bangladesh and xerox copy of temporary National ID card of Bangladesh and his signatures on them. Hence, the same are marked as **Ex.P.22** and **Ex.P.23** and signatures of the witness on them are marked as **Ex.P.22(a)** and **Ex.P.23(a)**.
8. About 60 families stayed in the sheds situated in the said land. After the NIA officer took Ferdous to their officer, I came to know Ferdous wrongfully confined about 20 persons. Some of the persons who stayed in the sheds used to tell me that Ferdous has not been paying salary to them. Our company regularly paid salary to Ferdous. In this regard I have given my statement before the NIA officer. Witness identifies production cum seizure memo dated 09.12.2023 and his

signature on it. Hence, the said production cum seizure memo is marked as **Ex.P.24** and signature of witness is marked as **Ex.P.24(a)**.

9. Srinivas Reddy and I went to NIA office and produced the xerox copies of Aadhaar cards. Witness identifies 10 xerox copies of Aadhaar cards and his signatures on each of them. Hence, the said 10 xerox copies of Aadhaar cards are marked as **Ex.P.25 to Ex.P.34** and signatures of the witness are marked as **Ex.P.25(a), Ex.P.26(a), Ex.P.27(a), Ex.P.28(a), Ex.P.29(a), Ex.P.30(a), Ex.P.31(a), Ex.P.32(a), Ex.P.33(a) and Ex.P.34(a)**.

10. Now I can identify accused No.1 – Ferdous. Witness identifies accused No.1 – Ferdous amongst the accused persons who are produced from Central Prison, Bengaluru through Vconsol. Witness identifies accused No.6 – Zakir who is present before court. Accused No.6 stayed in the place which is located opposite to our company. Our company used to approach for supply of man power (house keeping workers).

Cross-examination by learned counsel for the accused Nos.1, 4 to 6:-

11. The nature of our company was house keeping. The salary of workers of our company was paid in cash by our company. Our Enabler Property Service Private Limited company had license for running its business. The clients of our company were Accenture, HP, Ecospace, Ecoworld, Cap Gemini, Var services. My salary was credited to my bank account by our employer i.e., Enabler Property Service Private Limited Company. I do not know the mode of payment by cash or remitting the cash in the account of companies for the services which we provided to those companies.

12. I do not have the Data of the companies to whom we provide services.

Witness volunteers that the finance team of our company is aware of the said Datas. I do not know whether the license of our company was produced before the NIA officer by our company. It is true to suggest that I did not produce the license of our company before the NIA officer. It is true to suggest that as a beginner the salary of Ferdous was Rs.9,000/- per month. Witness further volunteers that may be in the year 2017 or 2018 as a beginner the salary of Ferdous was Rs.9,000/- per month.

13. The salary of 700 workers of our company amounting to approximately Rs.63,00,000/- per month was paid in cash by our company. Our field officer Ramaswamy introduced Ferdous to me.

14. As a Operation Manager the nature of my work was taking care of man power in the sites, taking care of cleaning and shortage of man power and the facilities like food etc., to the workers. As a Operation Manager I sit in the office and look after my work in the office. Every day in our office Monthly man power meetings are held involving the documentation, e-mails, working on computers, sharing the Datas with supervisors and assistant managers.

15. It is true to suggest that when a new person is recruited for job in our office, his informations are shared with me. The nature of duty of field officer is to go outside and resource and bring the workers. It is true to suggest that once the field officer brings the workers the said information has to be madatorily shared with me. It is true to suggest

that the field officer Ramaswamy shared all the information of Ferdous with me. At that time the field officer Ramaswamy produced the original Aadhaar card and 3 passport size photographs of accused No.1 in the office of our company. The office of our company was satisfied with the said original Aadhaar card. There after office of our company get the xerox copy of the said Aadhaar card and returned the original Aadhaar card. It is true to suggest that our office verified the Aadhaar card of accused No.1 before he is appointed.

16. Ferdous was appointed by following BGV (back ground verification).

Our company do not give appointment letter in writing to the person who is appointed. It is true to suggest that though our company has not given appointment letter in writing to accused No.1 – Ferdous, but our company appointed him by following back ground verification with the salary of Rs.9,000/- in cash. It is true to suggest that personally I do not know about the verification of the document and its authenticity whether it was genuine or fabricated. I have not seen physical copy of the document of Ferdous in the office.

17. Ferdous worked for 3 months. Ferdous left the job in the year 2018.

Salary of Ferdous for the said 3 months was paid in cash by our company. Our company never paid salary of Ferdous through bank account. I have given my statement before the NIA officer in the NIA office. It is false to suggest that I have given my evidence in examination in chief before court by improvising statement given given before NIA officer. Our company removed Ferdous from his job as he got injured in his leg when he was workig in the basement of our company building. It is false to suggest that I am deposing falsely by

misleading this court by stating false reason of his leaving his job and also term of his job in our company. I was knowing Ferdous very well.

(At this stage further cross-examination is deferred as court time is over.)

(TYPED IN OPEN COURT TO MY DICTATION)

R O I & A C

(KEMPARAJU)
XLIX Addl. City Civil & Sessions Judge &
Spl. Court of trial of NIA cases,
Bengaluru.