

To

SHO

Sector 20 Police Station, Panchkula

Haryana, India

**Subject: CRIMINAL COMPLAINT FOR REGISTRATION OF FIR
AGAINST Mrs. MEGHNA RANA, Mrs. CHAMPA RANA & Mr. RAJINDER
RANA (THE "ACCUSED") FOR OFFENCES U/S 34/120B/307/
319/320/351/503 OF INDIAN PENAL CODE, 1860**

MOST RESPECTFULLY SHOWETH:

1. The Complainant, Arun Kumar Singh, filing following complaint against Mrs. Meghna Rana, Mrs. Champa Rana, and Mr. Rajinder Rana.
2. That the Complainant is a victim of multiple tortures and offences by the accused parties.
3. That the marriage with Mrs. Meghna Rana was solemnized on 25th November 2015 in Prayagraj (previously known as Allahabad), Uttar Pradesh. The marital union was the result of fraudulent misrepresentations by Mrs. Meghna Rana and other accused about the nature and character of Mrs. Meghna Rana and other accused. The accused family is willing to commit fraud, kidnapping, torture, and abuse for the purpose of illegal and immoral monetary gains.
4. That the Complainant resided in Prayagraj for only about a week after our marriage. That Complainant expedited the VISA formalities and Mrs. Meghna Rana thereafter left for United States on 15th December 2015. That the parties started residing in United States since then until separation on 9th April 2021. We were blessed with a son on 14th February 2018 namely Atharva Kumar Singh, who was born in Jacksonville, Florida, USA. The minor child, by virtue of being born in USA, is an American Citizen.
5. That it is pertinent to note that in the year 2016, on 14th November the parties came to India and stayed together in Prayagraj in his matrimonial house for about two weeks. Mrs. Meghna Rana, despite having a good life in matrimonial house, was pressed to return and stay at accused's home so

bonding with new family could not occur. She stayed there till 09th February 2017 after which we flew back to United States.

6. Strangulation and Attempt-to-Murder by Mrs. Champa Rana - That after the birth of our son, the mother of Mrs. Meghna Rana i.e., Mrs. Champa Rana came to live with us for few months. That during those months, my mother-in-law had mentally and physically assaulted me couple of times over trivial issues. In one of the serious incidents Mrs. Champa Rana hold her hand against my throat i.e., strangulate me in an apparent attempt to kill me. This was the result of a trivial matter where I had displayed some concerns for infant child not being put on his mittens for his protection. Out of courtesy and mercy, and with some hope in of rectification of her ways, I hesitated reporting this to police for the fear she would be arrested in a foreign country. Numerous texts were exchanged with Meghna Rana afterwards and in one of the text Meghna Rana accepted Ms. Champa Rana assaulted and strangulate me. That the same can be provided, if needed.
7. False Evidence and false framing by Mrs. Meghna Rana: That during my relationship with Mrs. Meghna Rana Complainant had to give in to demands of monetary and non-monetary both. That in one such incident that took place on 8th April 2021, Mrs. Meghna Rana called 911 and made false statements in front of the Police officers. That after a meditative thought she stole the script right out of notorious George Floyd incident and claimed that the I did to her what convicted police office did to Mr. Floyd. That she gave false statement under oath that the I stepped on her 'neck' and caused obstruction to her breathing. She made series of false statements, one after the other. That evidence of her falsehood can be provided to support the same. Tired of COVID induced difficulties and always too greedy of easy and luxurious life, Mrs. Meghna Rana abused federal and state laws and perjured in front of New York state police officers and with full blown conspiracy by other accused and ran away to India with my minor on 30th April 2021. Court and police officers found Mrs. Meghna Rana's statement false and designed to frame someone and hence an investigative case was ordered against Mrs. Meghna Rana herself. Mrs. Meghna Rana and other accused, despite being aware of the investigation, have been hiding behind jurisdictional barriers, and never provided any cooperation in the investigation. Mrs. Meghna Rana very

cruelly and narcissistically not only subjected me to mental and psychological torture through her falsehood and crime of perjury, but she also stole my son to hand over to greedy accused.

8. Cheating, deception, injuries due to lies by Mrs. Meghna Rana: That it is apt to mention that two domestic incident reports were filed, within 24 hours. First incident report was filed with Officer Dana Kapuscinski afternoon of April 8th, 2022. That Respondent contacted one of hotel staff to reach out to me that Mrs. Rana is abandoning hotel overnight, and I should immediately take over. That please note that Hotel is where I was living at the time, and it was also my place for business. That Respondent tricked and when he arrived, she again called police and filed second incident report with Officer Daniel Hanson. That she has given contrary answers in these two reports to the same set of questions put forth by the officers. That she was attended by medical professional who described her physical injury as her face being red as only unusual condition. That importantly, after filing false complaint, she immediately left the country to avoid any consequences emanating therefrom.
9. Absconding after child kidnapping: That please note that Mrs. Meghna Rana ran away with the child to India, mainly due to the fear of being caught for her lies and prosecution. That please note that transportation of American child across the country without my consent and without a court order is a federal criminal offense. Mrs. Meghna Rana and other accused not only kidnapped my child, but they have also held him in illegal custody against my will for last more than 2.5 years. That Mrs. Meghna Rana under brain washed by other accused made huge demands to ransom money using my child as the leverage, which is nothing less than extreme mental trauma and harassment caused by her and other accused. That shockingly the Respondent has demanded a whopping amount of Rs. 50 Lacs in exchange of the child. Their demands have continued numerous times despite me facing business bankruptcy in United States. Any funds sent for the welfare of the child was not spent on him. That many a times, the Complainant has tried to give in to the demands of accused for the sake of his child. That relevant transaction proofs can be provide at a later stage.
10. Physical Assault by Mrs. Meghna Rana - That it is important to note that in June 2016, during one of the arguments, Mrs. Meghna Rana physically

assaulted me, by deliberately twisting my small hand finger tilting it to 90 degrees therefore resulting in its fracture. Mrs. Rana has depicted her violent behavior in past, resulting in other physical injuries. None of the incident resulted in even a scratch to Mrs. Rana. That the photographs showing the smashed finger is annexed as ANNEXURE -P1. Mrs. Rana, dissatisfied with not injuring enough, continued to verbally torture me while Complainant was driving to hospital and even after she was made aware of initial diagnosis of fracture in hand. That Complainant was hospitalized and a surgery on his hand was performed. Metal pins were inserted in my hand and removed many weeks later. Given that my trade involved typing, this incident made huge impact. That Complainant was even prohibited from driving. However, Mrs. Meghna Rana continued to force me to drive for every matter requiring driving, including driving more than 1500 Kms from Jacksonville to the Hotel with fractured hand. That Mrs. Meghna Rana, in her usual display of brutal and callous attitude, did not even once considered to pick-up her in laws when her inflicted injury required me not to drive. That in support of the injury Complainant am annexing the Hand Surgery Report from Erie County Medical Center, St, Buffalo, New York. That copy of the Surgery Report is annexed as ANNEXURE -P2.

11. Bloody assault to hand by Mrs Meghna Rana – That in July 2019, Mrs. Meghna Rana again in a fit of anger bit my left-hand area where thumb meets hand with full force until hand started to bleed and almost repeated her previous act of atrocities towards me. I wanted to go talk to my parents which Mrs. Meghna Rana did not approve of. While trying to leave the Scene of argument, Mrs. Meghna Rana pulled me towards her and used her mouth to bite with extreme force and duration. Blood was gushing out and bones could be seen from deep wound. Respondent then pressured me heavily to not seek any medical attention as she recommended wound to heal by itself. Complainant escaped the day from the cruelty and drove myself to emergency Section at hospital in Westfield, New York. That Complainant is annexing medical report from Allegheny Health Network where he went for treatment. The same is annexed as ANNEXURE -P3. That she has not only caused immense physical harm to me, but she has inflicted emotional, mental, verbal harassments in the past upon my parents.

12. Assault with Legs by Mrs. Meghna Rana: That one day argument started father in law of Complainant, wherein he threatens to falsely implicate Complainant entire family, Meghna proceeded with kicking me with her legs violently and vigorously. Complainant asked numerous times on the reason for assault, or why Mr Rajinder Rana threatened to falsely implicate family, Mrs Meghna Rana could not provide any reason. When Complainant prompted to call police, Mrs Meghna Rana pleaded emotionally to not do so. Even though Complainant ended not call police having mercy on her, a nearby residents to other room in hotel called police which Mrs. Meghna Rana misunderstood to have been called by the me. For the fear Mrs Rana would be thrown in jail, I did not divulge any details of assault to police at that time. Mrs. Rana carried with her deep grudge of police being called upon her after the incident prompting her to take revenge.

13. Numerous physical assaults over the years - That it is pertinent to note that Mrs. Meghna Rana has always shown a brutal and agitated attitude towards me since the inception of their marriage. Her interest and that of other accused has always been eventual monetary gain from the relationship. That there have been innumerable instances of physical, verbal, and psychological abuses by her upon me which existed till our separation. That there have been instances of inhumane behavior wherein she burnt my legs by pouring hot cooked lentils, inflicted head injuries so on and so forth. The I am annexing a photograph whereby head injury inflicted by Respondent upon the I is evidently visible for the perusal of the Court. The same is annexed as **ANNEXURE -P4.**

14. Fraud, Cheating and Money Extortion/Ransom after separation - Between a short period of April 2021 and March 2022 total of INR 21,51,658 of martial funds were transferred without my consent. Mrs. Meghna Rana made a demand for Rs.50 Lacs for the child and Rs. 50 Lacs for Meghna herself "I want Rs 50 Lacs for myself and Rs 50 Lacs for the child and I know you fucking have it" – said Mrs. Rana demanding money. Mrs. Rana, controlled like a puppet by law abusing Mr. Rajinder Rana, with full support and backing by law abusing Ms. Vandana Rana, continue demanding my parents to travel to Chandigarh so the extortion demands can be made in person, and

so that no record should exist of any such demands and transaction. Numerous text messages evidence of such coercion is available.

15. Causing financial distress and stolen funds before separation: In financial year 2020 when I was raising my minor child with Mrs. Meghna Rana, our hotel business was heavily struck by pandemic and income tax return reflects an economic loss of Rs. 20 Lacs. Mr. Rajinder Rana and Mrs. Champa Rana have been on lookout for such opportunities of financial distress to influence Mrs. Rana to take extreme measures to extract funds and move to India where those funds can be in their control. Mrs. Rana, under the influence of law abusing Mr. Rajinder Rana, with backing by Ms. Vandana Rana, engaged in incessant money extortion techniques USING Atharva as a shield to achieve their objectives. Mrs. Meghna Rana remit money from USA to India to an account controlled and used by Mr. Rajinder Rana for many months. Those transfers accelerated to huge amounts when Meghna reached in direct sphere of their influence.

16. Forcing Business Bankruptcy - That it is germane to mention that the I had ownership of a Hotel Business at Findley Lake, New York, USA. That due to the above-mentioned mental harassments and financial hardships caused by the Respondent, the Complainant left with no other choice has filed under Chapter 11 a bankruptcy petition at Bankruptcy Court in Buffalo, New York, USA. My hotel business had been in financial trouble and never really recovered due to damages by Mrs. Rana's actions. I was forced to file business bankruptcy on 19th Sept 2022 in Buffalo, in bankruptcy court of Western New York.

17. Intimidation via threats of fabrication of false cases: That all of the accused have been intimidating me and my family that if we do not give them money, they will implicate false legal cases upon us and will not give custody & meeting rights of my child. That it is germane to mention that Mrs. Meghna Rana had cunningly sneaked the minor son out of my lawful custody and illegally transported my minor child to India without any permission, approval, and agreement on 30th April 2021. Further torture was caused when I was not allowed to have appropriate access to my child. Please note that my son is a United States citizen and not India citizen still she has caused immense mental and psychological trauma by detaching & parting me from

my only son. That such a conduct is nothing short of extreme violence against any human. All the acts of all accused have been deliberate, conscious with full premeditation.

18. Frequent fraud and law Abuse: That the day-to-day lifestyle of Mrs. Meghna Rana is riddled with fraud, lies and law abuse. This is approved and promoted by greedy and morally deprave Rajinder Rana and built on premise that Vandana Rana, as a lawyer in family would save them from wrongdoings. Mrs. Meghna Rana misrepresented and defrauded US consulate in receiving US passport with full knowledge of having no consent from Arun. After refusal from US Consulate due to lack of documentation, did Meghna Rana intimidate Arun to strip Atharva of US Citizenship if no consent is given. Mrs. Rana did evade paying taxes in USA and is there a Tax Warrant in her name. Mrs. Rana stole from New York State's funds for unemployment claim for which she was not eligible due to running away to India and thus defrauding the state. Mrs. Meghna Rana also submits a fraudulent resume to receive employment with Amazon in India. Morally bankrupt Rajinder Rana is the psychopathological kingpin and conspirator, directly and indirectly, who very shamelessly continue to promote the wrongdoings.
19. That the I have been at the receiving ends of violence which has been caused over all these years by the Meghna Rana (wife) and her family. That the mental & psychological violence still continues till date by deliberately disassociating, separating & disuniting the minor son of the I from his lawful custody.
20. That in February 2023, when the Complainant went onto visit his son in Panchkula, Meghna Rana alongwith her father started the scuffle and, in that scuffle, the Complainant fell and had bruises. That they have a habit of making a mountain out of a molehill. That they continuously harass the Complainant in not letting him meet his son despite there being no adverse orders from court.
21. That there is criminal conspiracy by Mrs. Meghna Rana, Mrs. Champa Rana and Mr. Rajinder Rana. That they have caused voluntarily harm by using dangerous means or weapons. That they are violent, and many a times attempt to cause grievous hurt to the Complainant, some of photos are annexed above.

22. That Complainant have received threatening calls, some of which have been persistently done to my parents by Meghna Rana and her father to give money, failing which we have to face the music. That some of the messages can be given as proof, if needed.
23. That the accused Mrs. Meghna Rana has even pushed to suicide attempts by saying, "*Ek Kaam karo tum khud ko khatam kar lo*". That time and again she said that, causing immense cruelty upon Complainant.
24. That the accused persons with common intention and in collusion with each other have inflicted serious injuries upon the complainant, and the complainant was mercilessly beaten up by the accused person and due the said beatings of the accused persons, the complainant had suffered multiple injuries including head injury and fracture of finger and suffered a lot of mental and physical pain. The accused persons also threatened to kill the complainant and pressurized him to give in to their monetary and other demands.
25. That the accused Mrs. Meghna Rana has continuously harassment me not to talk to my parents and constant insistence to leave my parents, has caused immense disturbance and trouble to me and my family. Please note that many High Courts have called such act as cruelty and harassment by wife.
26. That the Supreme Court Reiterates: Registration of FIR compulsory upon Disclosure of Cognizable Offence in recently held *Sindhu Janak Nagargoje v. State of Maharashtra*.
27. That it has been held numerous times in plethora of judgements that the FIR can be registered even if a part of the crime has taken place within the jurisdiction of that police station.
28. That the Complainant even approached the police station sector 20 for filing of complaint and registration of FIR, but to no avail.
29. That the acts of the assault, physical abuse, harassment, criminal intimidation, attempt to murder took place within the jurisdiction of the Hon'ble Court. It is requested to please register FIR against Mrs. Meghna Rana, Mrs. Champa Rana & Mr. Rajinder Rana for offences U/s 34/120b/307/ 319/320/351/503 of Indian Penal code, 1860.
- It is prayed that an FIR may kindly be registered and the accused be arrested and brought to the books and tried as per law.

That the acts of the assault, physical abuse, harassment, criminal intimidation, attempt to murder took place within the jurisdiction of the present Police Station. It is requested to please register FIRa gainst Mrs. Meghna Rana, Mrs. Champa Rana & Mr. Rajinder Rana for offences U/s 34/120b/307/319/320/351/503 of Indian Penal code, 1860.

It is prayed that an FIR may kindly be registered and the accused be arrested and brought to the books and tried as per law.

DATE:

THROUGH

COMPLAINANT

**PREETI MANDERNA
ADVOCATE**