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Date: 9 SEP 2024



TO WHOM IT MAY CONCERN

AFFIDAVIT

I, **Jorge Renan Soils Marin S/o Jose Renan Soils**, aged about-73 years, R/o- Arboledas Primera Seccion Codigo Postal 45070, Zapopan, Jalisco. Mexico, Passport No: G31650940, do hereby affirm on oath that :-

1. That, I am the biological father of convict Jorge Renan Soils Fernandez who has been convicted in Special Session Case No.NDPS/17/2019 vide judgment dated 12/05/2023 passed by Hon'ble Session Judge, Spl.Judge NDPS Act Indore for offences punishable u/s 8/21(c) r/w section 27,23(c), 29 of the NDPS Act, 1985 and convicted for a period of 20 years alongwith the fine amount of Rs.4,00,000/-.
2. That, thereafter my son preferred criminal appeal no.4282/2024 which is pending before Hon'ble High Court of M.P. Bench at Indore.
3. That, on 25/09/2018 we got information that my above named son went missing from his hotel in Indore M.P. India.
4. That, one Sandeep Verma, Contact No.7389368182, contacted my daughter in law Mariana on her cell no.+521 33 13554005 and impersonated himself as an officer of the DRI, and demanded 500 Thousand Dollars in the form of ransom, stating that her husband Jorge would be released.
5. That, all his telephonic messages were recorded and be got the same electronic evidence ratified and verified through the Govt. agency in

Smt. P. [Signature]
M.A., B.Sc. [Signature]
NOTARY (Advocate)
INDORE (M.P.) INDIA

Maxico which is equivalent to section 65-B of the Indian Evidence Act, 1872.

6. That, I had intimated the Maxican Embassy regarding all this evidence received by us, to which the Maxican Embassy advised us to come to India and file a complaint before the police authorities at Indore.
7. That, I arrived India (Indore) for the first time on 29/08/2024 and after having interview with the son in jail received relevant documents pertaining to his case and in compliance with or advice from the embassy, I am hereby filing FIR against Sandeep Verma and other co-accused persons, who virtually kidnapped my son and asked for Ransom from his wife Mariana on 29/09/2018.
8. That, Mr. Sandeep Verma and other persons also threatened us not to disclose regarding electronic conversation in as much that my son Jorge's life was at stake.
9. That, I did not take any legal recourse, in Maxico, but I filed the missing report and complaint also in Maxico and also intimated Maxico embassy in India.
10. That, I am filing an FIR alongwith the relevant documents before P.S. Tukoganj, Indore as well as filing complaint report Police Commissioner, Indore and also sending copies to Ministry of Home Govt. of M.P., Ministry of Home Central Govt. New Delhi, Ministry of External Affairs New Delhi, Maxican Embassy New Delhi for kind perusal and action in accordance with law.
11. That, I have made this affidavit under no duress, threat or fear.

Indore

Date: 09/09/24

Deponent

VERIFICATION

I, **Jorge Renan Soils Marin S/o Jose Renan Solis**, solemnly affirmed that the contents of this affidavit from para 1 to 11 which has been read over to me by my grandson who is conversant in Spanish and English as well, nothing false has stated therein and nothing has been concealed.

Indore
Date: 09/09/24

Deponent



I swear in before me on this time day of
9 SEP 2024 by Shri Jorge Renan Soils Marin
S/o Jose Renan Solis
who has been identified to me by Shri Erika
Jorge Renan who is known to me/whose signature is attested.
S. No. 727 Date 9 SEP 2024



[Signature]

Identified by me

Erika Alejandra
García Venegas

G 23194010

Smt. Purnima
M.A., B.Sc., LL.B. (Hons.)
NOTARY (Advocate)
INDORE (M.P.) INDIA

To,

The Commissioner of Police

Indore (M.P.)

D.P. Zone 3

Name : Jorge Renan Soils Marin
S/o : Jose Renan Solis
R/o : Arboledas Primera Seccion Codigo Postal 45070,
Zapopan, Jalisco. Mexico.
Passport No: G31650940
Country : Mexico

Subject:

Complaint regarding "Sandeep Verma" who posed as an officer of Directorate of Revenue Intelligence "D.R.I.", who kept my Son Jorge Ronan Solis Fernandez in forceful custody and demanded ransom on behalf of DRI officers.

Full Name of Accused : Shri Sandeep Verma S/o Ram Swaroop Verma.
Age : 35 years.
Occupation : Private Cab Driver.
Address : 342, Ambikapuri Ext., Indore. M. P.,
Contact No. : 7389368182

Subject matter in brief:

I am Jorge Renan Solis Marin, father of Jorge Renán Solis Fernandez. My Son visited India on date 23 September of 2018 on tourist visa.

My Son was falsely implicated in a case and got illegally convicted. Being Mexican could not properly knew the charges then. The communication gap and language was the reason.

My Son after conviction got transferred from Indore District Jail to Indore Central Jail. In Indore Central Jail the superintendent Madame allowed Jorge to attend English school, where with the help of eminent jail teachers



29-9-2024

and co- prisoners, he learnt English i.e. from at least broken English to somewhat English so he can now explain things to lawyers.

Lawyers in India and Para-legal volunteers of prison explained this case of my Son to me. All the illegalities and unconstitutional part of this implicated case was pointed out to me. When I arrived in Indore on 29/08/2024, thereafter we sought an appointment at the Central Jail Indore with the kind permission of the jail authorities. We came to know about all these further developments, and could only lay hands on relevant documents in the form of judgment of the trial court and also a writ petition filed on behalf of my son in W.P.No.21510/2024, wherein after perusing the reply filed by the respondent state. We came to know that Sandeep Verma has become a witness in the said case, and infact he is the kingpin in the whole Saga, wherein he has implicated my son Jorge and has given the whole NDPS case in the texture of a DRI matter by involving my son as a foreign accused in the said case.

Sandeep Verma posing as DRI officer then had contacted Jorge's wife i.e., my daughter in law. Sandeep Verma had my daughter in law's phone number in Mexico No. +521 33 13554005 and made her phone calls from his own mobile No. 7389368182 through Whatsapp.

She was informed by Sandeep Verma that Jorge is in apprehension and in his custody. Sandeep Verma sent a Selfie photo to Jorge's wife where Jorge is seen in confinement of Sandeep Verma. Picture is clear that Jorge is kept in forceful confinement of Sandeep Verma at that time. There was no other officer of D.R.I. present then with Jorge. This is a direct evidence of mal practice.

My daughter in law i.e., Jorge's wife, was threatened by Sandeep Verma that Jorge will be severely hurt and will face deadly consequences if they use any means to save Jorge legally. By different Whatsapp numbers, ransom of 500 thousand dollars was made to her. She was said that Jorge can be spared by them if she paid that huge amount.

Jorge's wife was told not to inform anyone about these acts. Jorge even was produced before her through video call, asking her to do everything as they say. Even those calls were asked to get deleted immediately, which in great fear was done by her.

Thus we were forced to do something which was not legal, i.e. we were abstained from doing acts to save innocent Jorge. Thus we were compelled to do acts by keeping Jorge in detention and with threats to cause great hurt and it was done.

With these acts, direct cogent evidences of detentions, forceful threats, and dire to face severe consequences along with Ransom demand got washed away.

Further, the threats continued for months and on 25 of December 2018, nevertheless all phone numbers had been blocked by my daughter in law, knowingly that it was Christmas date and aware that this is the most important date for Christians in Mexico, again the imposter Sandeep Verma with the help of cyber experts, traced the Facebook linked to Jorge's wife and started scaring her. This time using the Facebook account "@nitesh anand". In those conversations, Sandeep Verma accused Jorge's wife of blocking his number "+91 7389368182", and he even acknowledged that he was "in D.R.I.". Jorge's wife finally blocked him one more time, now from the social media Facebook.

Since such acts of Sandeep Verma made her realize that there was something very fishy there, these people were following her to harm the entire family if she didn't pay.

Now with the help of our Mexican Central Government, our Mexican Embassy in New Delhi and from help of office of Ministry of External Affairs India, I am advised to file this F.I.R., as per the "Rule of Law" and Constitutional Rights of individual given in Constitution of India to foreigners so that there can be an investigation of "truth" and unlawful involvement of DRI officials with Sandeep Verma in this matter.

I talked with wife of my Son "Jorge", Ms. Mariana Apodaca Villasenor; it is exactly how she narrated the entire incident to me. Thereafter we got her mobile phone examined by a Mexican government's certified forensic expert and the report is with us and filed with this application.

Sandeep Verma's acts are available as direct evidence as certified by forensic experts. Sir, a private person who is a driver of private cab cannot contact the family of accused Jorge, with photo of Jorge in his custody actually. He cannot claim himself as D.R.I. officer and investigator of case.

The question is how he got the mobile number of Jorge's wife and forceful confinement of Jorge, when Jorge was supposed to be with D.R.I. as ordered by Hon'ble Court.

Further, how and why a private person as independent witness in case can be allowed to take confinement and photographs, Selfies of my Son when he was supposed to be in custody of court/D.R.I. actually? Why he threatened and asks ransom is proof that my Son was kidnapped for money.

Again, there is a DVR seized in case under exhibit No. 50 is also a proof of how my Son Jorge was falsely implicated and how evidences of his abduction and ransom demand was suppressed are in the memory of this DVR.

My son does not know English, or the Vernacular, and the whole trial has proceeded in an oblique manner, and hence his fundamental right of a fair trail has been jeopardize and his fundamental right at the Article 21 of the Constitution of India and his International Rights enshrined in the international treaties of the Genava convention have been violated and hence he seeks indulgence from the said authorities.

That, the police authorities at various other authorities are being apprised by me so that justice is meted out to my son in accordance with law.

Enclosed – Copy of Passport , Copy of Affidavit is annexed & various other relevant documents.

Place - Indore

Jorge Renan Soils Marin

Date -