

**IN THE COURT OF THE ADDL. CHIEF METROPOLITAN
MAGISTRATE, 47TH COURT, ESPLANADE, MUMBAI.
C. C. No. 256/PW/2023**

(Pimpri Police Station C.R. No. 102/2002)

Exhibit- 21

C H A R G E

I, S.P. Shinde, Addl. Chief Metropolitan Magistrate, 47th
Court Esplanade, Mumbai, do hereby charge you;

Accused No. 1 - Sanjay Hariram Agarwal

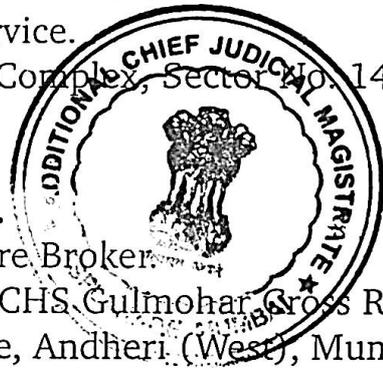
Age: Adult, Occ: Business.
R/o. 193, Lalit Kutir Co.Op. Hsg. Society,
Gulmohar Cross Road No.9, JVPD Scheme,
Andheri (West), Mumbai

Accused No. 2 – Subodh Chanddayal Bhandari.

Age: Adult, Occ: Service.
R/o. 3/307, Govind Complex, Sector No. 14, Vashi,
Navi Mumbai

Accused No. 3 - Ketan Kantilal Sheth.

Age: Adult, Occ: Share Broker.
R/o. 193, Lalit Kutir CHS Gulmohar Cross Road
No. 9, JVPD Scheme, Andheri (West), Mumbai



Accused No. 4 – Prakash Ganesh Afale.

Age: Adult, Occ: Business.
R/o. 12, Kalika Apartment, Pawana Nagar,
Chinchwad, Pune-33

Accused No. 5 – Mamanchand Chhoturam Agarwal.

Age: Adult, Occ: Business.
R/o. Vatika, Plot N. 31, Sector No. 24, Tilak Road,
Pradhikaran, Nigadi, Pune-44.

Accused No. 6 – Sunil Pratap Madkikar.

Age: Adult, Occ: Business.

R/o. Plot No.45, Sector No. 27, Pradhikaran,
Nigadi, Pune -44.**Accused No. 7 – Ashok Ramkrishna Kulkarni**

Age: Adult, Occ: Retired.

R/o. Prasad, Scheme No.3, House No. 32,
Near Modern Highschool, Sector No. 21,
Nigadi, Pune-44**Accused No. 9 – Manikdal Bodhumal Malpani.**

Age: Adult, Occ: Retired.

R/o. 344, Shaniwar Peth, Pune.

Accused No. 10 – Satish Vithoba Gaikwad.

Age: Adult, Occ: Service

R/o. Adinathnager, Bhosari, Pune-39.

Accused No. 11 – Umesh Madhav Inamdar.

Age: Adult, Occ: Consultancy.

R/o. Gulmohar, Plot No. 375, Sector No.21,
Yamunanagar, Nigadi, Pune-44**Accused No. 14–Nandkishore Shankarlal Trivedi**

Age: Adult, Occ:

R/o. 3A, Pushpak, Ville Parle (West),
Mumbai-56.

as follows:

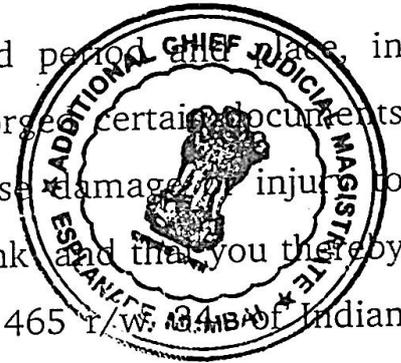
That you are accused from February 2000 to 06.05.2002 at Shree Sadguru Jangli Maharaj Sahkari Bank Ltd, Chinchwad, Pune in furtherance of your common intention with other accused, being director of M/s. Home Trade Limited and Shree Sadguru Jangli Maharaj Sahkari Bank Ltd entrusted with certain property, i.e. cheques of Rs. 55 Crores, committed criminal breach of trust and



that you thereby committed an offence punishable under section 406 r/w. 34 of Indian Penal Code and within my cognizance.

Secondly, you on the abovesaid period and place, in furtherance of your common intention, being trustee of the Shree Sadguru Jangli Maharaj Sahkari Bank, and in such capacity entrusted with certain property, i.e. amount invested by members and investors of the bank, committed criminal breach of trust in respect of said property, and that you thereby committed an offence punishable under Section 409 read with Section 34 of Indian Penal Code and within my cognizance.

Thirdly, you on the abovesaid period and place, in furtherance of your common intention, forged certain documents i.e. RBI PDO receipts with intent to cause damage/injury to Shree Sadguru Jangli Maharaj Sahkari Bank and that you thereby committed an offence punishable U/sec. 465 r/w. 34 of Indian Penal Code and within my cognizance.



Fourthly, you on the abovesaid period and place, in furtherance of your common intention, with other-accused, forged a certain document purporting to be a valuable security i.e. RBI PDO receipts with intent to cheat and that you have thereby committed an offence punishable U/Sec. 467 r/w. 34 of Indian Penal Code and within my cognizance.

Fifthly, you on the abovesaid period and place, in furtherance of your common intention with other accused, forged certain documents i.e. RBI PDO receipts intending that it shall be used for the purpose of cheating, that you have thereby committed an offence punishable U/Sec. 468 r/w. 34 of Indian Penal Code and within my cognizance.

Sixthly, you on the abovesaid period and place, in furtherance of your common intention with other accused, fraudulently used as genuine a certain document i.e. RBI PDO receipts and that you thereby committed an offence punishable under Section 471 r/w. 34 of Indian Penal Code and within my cognizance.

Seventhly, you on the abovesaid period and place, in furtherance of your common intention with other accused, cheated Shree Sadguru Jangli Maharaj Sahkari Bank by dishonestly inducing it to deliver 55 post dated cheques issued by M/s. Home Trade Limited to you and which was the property of the said bank and cheated to bank for an amount of Rs.48.53 Crores and that you thereby committed an offence punishable under section 420 r/w. 34 of Indian Penal Code, and within my cognizance.



Lastly, you accused Nos. 12 and 13 on the abovesaid period and place, committed the offence of cheating and criminal breach of trust, and that you abetted the accused Nos. 1 to 11 in

the commission of the said offence of cheating and criminal breach of trust, which offence was committed in consequence of your abetment, and that you have thereby committed an offence punishable under Sections 109 and 34 of the Indian Penal Code, and within my cognizance.

And I hereby direct that you be tried by me on the said charge.

Mumbai, dated 18th day of September, 2023.

Date.18.09.2023

Shinde
(S.P. Shinde) *18-9-23*

Addl. Chief Metropolitan Magistrate,
Court, Esplanade, Mumbai.



The charge is read over and explained to the accused in vernacular.

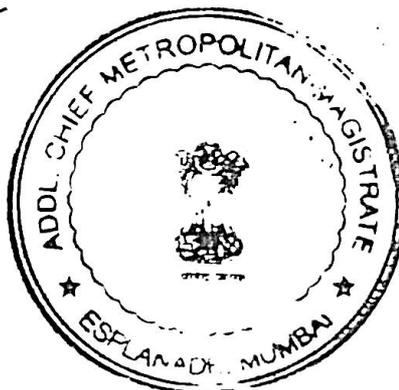
Dt. 18.09.2023

Shinde
(S.P. Shinde) *18-9-23*

Addl. Chief Metropolitan Magistrate,
47th Court, Esplanade, Mumbai.

TRUE COPY

[Signature]
Judicial Clerk
Additional Chief Judicial Magistrate
19th Court, Esplanade, Mumbai



Applied on - } 04/9/23
Granted on - }
Ready on - } 09/9/23
Delivered on - }
Charges: P. 55 X 4 = 220/-