



Government of Karnataka
Revenue Department

Office of the Regional Commissioner, Bangalore Division &
Nodal Officer, Ex-officio Secretary (Economic Offences)
2nd floor, BMTc Building, K.H. Road, Shanthinagar, Bangalore-27.

No.ELN.CR/16/2022-23

Date:07-02-2023

To,

The Chief Electoral Officer &
Ex-Officio Secretary to Government,
DPAR (Elections)
Karnataka, Nirvachana Niylaya,
Sheshadri Road, Bengaluru.

Dear Sir,

Sub: Submission of Final Report Part-2 on complaint regarding alleged misuse of permission given for creating voter registration awareness by M/s Chilume Educational, Cultural and Rural Development Trust and impersonation in the name of BLO by private person in BBMP area, Karnataka.

- Ref:1.** CEO, Karnataka Letter No. DPAR 122 ELN-PGR 2022 dated 17-11-2022.
2. ECI Press Note dated 25-11-2022.
3. This office even number letter dated 02-01-2023.
4. This office even number letter dated 14-01-2023.

With reference to the subject, an interim report of the investigation and the Final Report Part-1 Executive summary and the findings were submitted vide references (3) & (4) respectively. In continuation to that, Final Report Part-2 details of investigation, conclusion and recommendations are enclosed herewith for your perusal.

Thanking you,

Yours faithfully

(Amlan Adithya Biswas) IAS,
Regional Commissioner,
Bangalore Division, Bangalore &
Nodal Officer, Ex-officio Secretary
(Economic Offences)

Comprehensive Investigative Report on Misuse of ID card for Collection of Electors' Data by Chilume Trust in BBMP Area

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PART I

Assignment of Inquiry & Terms of Reference

On 17th Nov 2022 an enquiry was ordered to be conducted by Regional Commissioner & Ex Officio Secretary (Economic Offences) into two separate complaints received by CEO Karnataka from Samanwaya Trust on 20th September 2022 and the KPCC on 17th November 2022, besides a number of print and visual media reports.

As per the order of the CEO, Karnataka, confirmed by the ECI on 22nd November, 2022, the Terms of Reference were as below:

“In view of the sensitivity and seriousness of the issue it is felt that a comprehensive investigation is required to be conducted. You are requested to conduct a detailed enquiry into the matter and send a comprehensive report at the earliest”.

Subsequently, copies of memoranda submitted by the KPCC and the AICC to the ECI, dated respectively, November 19th and 21st and a complaint made by the BJP on November 19th have also been received by this office.

Executive Summary

Complaint or Allegation Summary

The factual allegations are defined as below based on the terms of reference. This in turn is used to determine the scope and temporal as well as spatial width of the enquiry. It has been assumed that even if a complainant withdraws a complaint or modifies it, the original shall determine the nature and content of the enquiry if otherwise corroborated by evidence.

1. Samanwaya Trust:

- a. “Samanwaya Trust”, has complained on 20th September, 2022 to both Assistant Commissioner Elections, BBMP and CEO, Karnataka that Chilume Trust had sub-contracted them to carry out voter survey on the basis of an order issued by DEO & Chief Commissioner BBMP dated 20th August 2022 and had promised to pay a certain sum of money per Voter, to the surveyors provided by the sub-contractor, including provision of authorized ID Cards as BLO, for collecting voters’ data and had after a certain period of training and survey, reneged on the payment.

2. KPCC & AICC: Both have submitted similar issues as below:

- a. Electoral fraud is alleged in unspecified booths of BBMP area caused by the engagement of NGO for SVEEP activities by Chief Commissioner, BBMP & DEO Bangalore on 20th August, 2022 and related Electoral Officers
- b. The said NGO is alleged to be a private, shell company and owner of a digital survey App titled Digital Sameeksha App and has obtained BLO ID Cards signed by BBMP officials and other electoral officers to impersonate BLOs and gain access to people’s homes and collect voter’s data including personal data like Adhaar Card, caste, community, phone number etc which allegedly has been loaded onto their own digital App with the objective of (a) commercial use and (b) manipulation of electoral roll to delete existing persons or include outsiders
- c. Specific reference to Shivajinagar and Rajarajeshwari Nagar constituencies have been made

- d. Chilume Trust, Chilume Enterprises, DAP Hombale and Digital Sameeksha are allegedly owned and operated by related or same set of persons
- e. Matter is to be investigated as a criminal case

3. BJP:

- a. While alleging the possible existence of multiple identities of the same voters in many constituencies of BBMP and Karnataka, the efforts of the ECI to weed out multiple entries by PSE and DSE are appreciated
- b. Voter awareness program allegedly assigned to Chilume Trust in 2017-18 is sought to be enquired into
- c. The police complaint by BBMP officials on Chilume on 17th November 2022 is also appreciated and requested to take action against both private individuals and officials if found involved

Scope & Method of the Investigation

All relevant lines of inquiry are pursued, including possible exculpatory evidence. Evidence collected is corroborated to the extent possible within the available time and primacy is given to documents duly signed. Oral evidence is reduced to writing and signature of statement giver is obtained. Interviews are conducted with complainant, subject/ s of complaint, and relevant accessories as well as decision takers and witnesses and they are given adequate opportunities to provide their account including any credible exculpatory or mitigating evidence. The scope of the enquiry has been extended to include all election related activities in which the person/s complained against have been involved within the spatial scope of BBMP.

Evidence

The following types of evidence have been considered:

Witnesses - i.e., Interviews with those who know something of relevance to the allegation

Documents - records, files, archives, print-outs, photos

Digital records - Hard drives, email records, online web pages & videos

Re-interview of certain witnesses (particularly the subjects complained against and some decision takers) have been conducted to clarify information previously given and/ or to give them the opportunity to respond to particular emerging elements of the information gathered during the enquiry.

Interviewing Method

Confidentiality, Neutrality and Fairness

All those involved in the investigation (Enquiry Officer, Support Staff, Subject Expertsetc) are bound by the obligation of confidentiality. Statements of interviewees are used for the purposes of the investigation and as information gathered may be used for administrative, disciplinary or judicial proceedings, statements have been cross-referenced to other witnesses, including the subjects of complaint, in order for them to respond as part of a fair process and the interviewees are informed that the information, they provide is confidential only within the parameters set out above. Interviews are conducted under oath and a signed copy is provided to each interviewee. All interviews are conducted in a neutral office environment of the Enquiry Officer.

During the interview

A detailed verbatim record of questions and answers made during an interview is maintained along with unedited audio record.

Documents

All official records and documents, including those in electronic format from various offices concerned are acquired with a formal request. For non-officials, documents in original have been sought for determining veracity of copies. Necessary notices have been sent from the offices of the Enquiry Officer providing adequate time for their production.

Accessing relevant electronic data

Computers: Hard disk of relevant computers from ERO offices have been copied and examined.

Networks: Official E-mail servers and web servers of BBMP offices have been accessed and searched using key words to obtain historical records and other relevant referential documents available on the server

Internet: Websites (www.godaddy.com, You Tube Channel, Job Recruitment websites like Workindia.in etc) have been searched for posts and activities by the subjects of the complaints

Assessment of Credibility of Interviewees

- i. Any internal inconsistencies or inconsistencies with other statements made by the witness, taking account of whether the inconsistencies are on a material point
- ii. Whether the facts proffered as true by the witness are supported by the evidence, in particular any documentary evidence.
- iii. Demeanour of the witness mainly the understandable inability to recollect in contrast to a deliberate attempt to avoid answering direct questions, answering without any clarity, responding with evasiveness, or lack of responsiveness.
- iv. Existence or nonexistence of a bias, interest or other motive
- v. Any admission of allegations.

The witnesses' evidence, are assessed using the factors below, including corroborative statements made by a complainant or other witnesses. Adverse inferences have been drawn from deliberate failure to cooperate despite adequate opportunity or from consciously evasive responses to questions.

Assessment of Evidence

When assessing the evidence, it is ensured that direct and circumstantial evidences are not confounded.

Standard of Proof & Investigative Determinations

For the purposes of this enquiry, **Substantiated Evidence** is defined as sufficient evidence to justify a reasonable conclusion that the allegation is true. **Unsubstantiated** is defined as insufficient evidence to either prove or disprove the allegation. **Unfounded** is defined as the allegation is proved to be false or there is no credible evidence to support the allegation. The enquiry does not reference the burden of proof in making its findings, and the assessment of sufficiency is for those authorities who must take action on the basis of the investigation. Instead, the evidence is explained and linked to the findings of fact.

Summary of the Findings

- ✓ 1. **No electoral fraud or manipulation of electoral roll is detected in the three constituencies of 162 Shivajinagar, 169 Chikpet and 174 Mahadevpura.**
- ✓ 2. **There is no evidence of any intrusion into or tampering of data on ERO.net or the operation of Garuda App.**
- ✓ 3. **Verifications of allegations regarding the activities of Chilume Trust are found to be partially correct based on the collected evidence:**
4. The involvement of some BBMP officials in the offence of enabling Chilume Trust to illegally collect voter data on an unauthorised private Digital Application (Digital Sameeksha) and storage of the same in a foreign server, thereby creating wilfully, opportunities for wrongful gain from personal data is strongly indicated by available evidence in the case of former EROs, Mahadevpura, Chikkapete and Shivajinagara as well as in the case of former DC Bengaluru (Urban). This requires separate investigation by the police.
5. There is also some unexplained foot-dragging and delay in taking action on the complaint dated 20th September, 2022 by Samanwaya Trust by the then Special Commissioner, Elections and the SVEEP Nodal Officer, BBMP, the intent of which needs to be established in more detailed departmental enquiry. This delay is stark in comparison with the speed with which Chilume's proposals and bills have been processed on various occasions since 2019.
6. The works and services carried out by Chilume Trust and its sister organizations for BBMP and DC Bengaluru (Urban) with respect to elections since 2019 also need to be thoroughly investigated and audited for procedures and financial commitments.
7. The data collected by Chilume Trust through its own Digital Sameeksha App is allegedly stored on a foreign server and must be recovered immediately and a criminal case filed for this itself.
8. The orders issued by the Chief Commissioner & DEO BBMP in November 2018 and August 2022, particularly the latter, though prima facie based on inadequate analysis by their subordinates, given the context of the role of the DEO in BBMP, seem to be done without any malafide intentions. However, detailed SOP and orientation need to be carried out for all DEOs and SVEEP nodal officers with respect to appointment of NGOs, strictly in tune with the ECI's SVEEP Guidelines of 2016, as modified from time to time.
9. The appointment of Chilume Trust for provision of private BLOs and issue of BLO cards to them by AEROs requires further detailed investigation and prosecution under RP Act and other relevant laws.

Conclusions

1. **A detailed procedure with clear guidelines and checks and balances needs to be put in place with respect to using NGOs in SVEEP. In the guise of free service certain NGOs may just be getting a foothold into the activities which are sensitive in nature.**
2. **Collection of voters' personal data may lead to various legal complications regarding misuse of personal data particularly if enabled by an innocuous or broad spectrum official permission. There are possibilities of certain officials misusing such permissions down the line to stretch their applicability which could put the perception of free and fair process of elections at risk.**

3. **The process of ensuring complete purity of electoral rolls while tamper-proof at the apex level, requires an additional desk top sample verification procedure and field re-verification particularly to ensure all PSE clusters are DSE verified.**
4. **The criminal aspects of the matter need to be specifically dealt with by a separate criminal investigation by the police authorities.**
5. **Strict disciplinary proceedings need to be instituted against those officials involved in such criminal proceedings**
6. **The election machinery of BBMP needs to be drastically revamped and oriented.**

PART II

Details of Investigation

BACKGROUND

A complaint dated 20th September 2022, by an NGO "Samanvaya Trust", about another organisation, Chilume Educational, Cultural & Rural Development Trust regarding non-payment of dues for sub contracted voter survey was assigned to this authority on 17th November 2022. The enquiry was commenced on 19th November 2022 in a planned fashion. The methodology adopted is detailed below:

- 1) Examination of official documents files, reports, of BBMP & Deputy Commissioner, Bangalore Urban
- 2) Recording of statements of complainants
- 3) Recording of statements of concerned officials, staff etc.,
- 4) Recording of statements of private accused persons and other witnesses.
- 5) Additional information and documents from Police authorities, Registrar of Companies, Commissioner Commercial Tax, Executive Engineer PWD, Bangalore Urban, and District Registrar.
- 6) Statement of Accounts and or Bank Statement of Chilume Trust, and its linked sister companies.
- 7) Analysis of the above documents and statements
- 8) Examination of established guidelines for SVEEP and comparison with procedure adopted

FACTS OF THE CASE:

On 20-09-2022 Samanvaya Trust, claiming to have an agreement with Chilume Educational, Cultural & Rural Development Trust (henceforth Chilume for short) for survey of voters made a complaint to both the CEO, Karnataka and the BBMP, specifically the Assistant Commissioner Elections and forwarded by CEO to Special Commissioner, Admin & ADEO Central, Sri. S. Rangappa, I.A.S, who was also holding the charge of Special Commissioner Election BBMP that Chilume Trust had contracted them for house to house survey and also provided training and 12 BLO/Booth level Co-ordination Officer Identity cards and assured certain financial terms to the surveyors. The complainant alleged that Chilume trust had reneged on the contract. Examination of the complaint, the statement of the complainant and other documents including the draft agreement and survey form, digital maps given to the surveyors and BLO/BLC cards issued by Deputy Commissioner, Bangalore Urban, make it clear that

- (a) Chilume trust who had already obtained on 20-08-2022 a permission for conduction of SVEEP activities along with BLOs including street plays, road shows, Jatha in metro stations and other public places, pro bono, had actually sub contracted Samanvaya trust for a different kind of survey which included Voter and Polling station details in the first week of September 2022 and had issued 10 numbers of BLO/BLC ID cards which were fake, though signed with the seal of the Deputy Commissioner Bangalore Urban.
- (b) The complaint was received through e-mail by BBMP and was also referred from CEO, Karnataka on September 20th 2022. The BBMP officials, specifically the Special Commissioner Election, and the SVEEP Nodal Officer to whom the complaint was forwarded by the AC should have realised the gravity of the complaint particularly in view of the fact that (i) The BBMP had permitted Chilume Trust to conduct SVEEP activities in the BBMP area pro-bono and (ii) The complaint referred to voter survey as well as use of ID cards authorised by Deputy Commissioner, Bangalore Urban, on certain terms of payment, none of which were envisaged in the 20-08-2022 letter.
- (c) Yet, the matter was not brought to the notice of the Chief Commissioner and DEO till a news reporter mentioned it to him in the last week of October. Thereafter, on the directions of the Chief Commissioner, BBMP the permission letter to Chilume was cancelled by Sri.Rangappa, I.A.S., apparently on 02-11-2022. However, the date of cancellation is disputed by the complainant stating that on 03-11-2022 Ravi Kumar, the owner and other members of Chilume Trust arrived at her residence in the morning and forced her to withdraw the complaint by e-mail.

The Chief Commissioner, BBMP Sri.Tushar Girinath, I.A.S., received a complaint forwarded by CEO Karnataka, on 10-11-2022 regarding misuse of BLO ID cards by private persons in 174 Mahadevapura and immediately ordered for a report by ADEO & Deputy Commissioner Bangalore Urban under whose jurisdiction 174 Mahadevapura falls. Meanwhile the ERO Mahadevapura filed a police complaint dated: 15-11-2022 regarding misuse of BLO/BLC ID cards in FIR No. 0217/2022, and Deputy Commissioner Bangalore Urban on 17-11-2022 gave a report to the Chief Commissioner BBMP stating the following :

- 1) The ERO has issued the Booth Level Coordination Officer ID cards to Chilume, but in place of Booth Level Coordination Officer the Chilume has impersonated as Booth Level Officer.
- 2) It is illegal to issue any ID cards to any private person or agency in election work, and the issuance of BLCO card by ERO is clear violation of Representation of People's Act and also the impersonation as BLOs by Chilume Trust is illegal and also reported that the ERO has illegally affixed his seal and signature on the cards issued. The Deputy Commissioner, Bangalore Urban, and the ADEO North requested to initiate penal action against the erring organisation and ERO Mahadevpura.
- 3) It is to be noted as already pointed out in paras above that though the Deputy Commissioner, Bangalore Urban Shri Srinivas, I.A.S., had allegedly himself issued similar ID cards for BLC in 174-Mahadevapura, he had made no mention of this in his report. Though this is disputed by the Deputy Commissioner Bangalore Urban and ADEO in his statement to the undersigned, it is confirmed by his Election Shirishtedar and is also under investigation by the police authorities. A fuller picture shall emerge only when the FSL report of the signed cards emerge.

- 4) On 15-11-2022 ERO Mahadevapura Sri. Chandrashekar filed a complaint in Kadugodi Police Station under Mahadevapura limits, regarding the misuse of IDs issued by the ERO himself by one Sri. Lokesh of Chilume Trust. Yet, the ERO failed to report that he had issued IDs to a private institution which were not authorised by any officer of BBMP or by the ECI.
- 5) On 17-11-2022, on directions from the DEO & Chief Commissioner, BBMP, Mr.Rangappa IAS the Special Commissioner Admin and Elections BBMP filed a police complaint against Chilume Trust in FIR NO 0217/2022. Between 19-11-2022 & 21-11-2022 the ADEO Bangalore Urban and ADEO Central both reported issue of ID cards to Chilume Trust by ERO Chickpet, Mahadevapura and Shivaji Nagara while the police also arrested, besides these officers, the AERO of RR Nagara for similar offence. While all these four officials were suspended by the DEO, neither disciplinary enquiry has been drawn up against them nor has police complaint been made so far by the BBMP though it is clear that there is no provision to provide ID Cards to any private person for any kind of election survey and there not only was dereliction of duty by the EROs, but also gross misuse of office and deliberate attempt to enable a private organisation to directly have access to voters under the guise of an official sounding post "BLCO" which does not exist. In other words, this action of the EROs amounts to criminal breach of trust and fraud under Section 167 IPC.

Documents and Statements Examined:

- 1) Office of the Deputy Commissioner, Bangalore Urban
 - a) ELN/CR 25/2018-19
 - b) ELN/SVEEP/CR/73/2021-22
 - c) ELN/SSR/CR/01/2021-22
 - d) ELN/SVEEP/CR/01/2022-23
 - e) ELN/SSR/CR/16/2022-23 (Part-1)
 - f) ELN/SSR/CR/16/2022-23 (Part-2)
- 2) Office of the ADEO Central and Special Commissioner (Admin) BBMP
 - a) AC/ELN/PR/94/2022-23
 - b) AC/ELN/PR/94/2022-23
- 3) Office of ERO Mahadevapura and RO
 - a) 174-Mahadevapura AC/CR/19/2021-22

Statements of :

- 1) Complainant Smt.Sumangala K H, Managing Trustee and Founder, M/s Samanvaya trust (R), Jagaluru Taluk, Davanagere District,
- 2) Sri.K Chandrashekar, ERO Mahadevapura AC
- 3) Sri.G.S.Siddalingappa , AERO Whitefield Sub Division.
- 4) Sri.Krishnappa,N , AERO Marthahalli Sub Division.
- 5) Sri.S.Ajithkumar Rai, Tahasildar and AERO Bangalore East Taluk
- 6) Smt.Jyothilakshmi, S. AERO Hoodi Sub Division.
- 7) Sri.Upendra Rao, G. FDA, O/o the ERO Mahadevapura AC
- 8) Sri.Vinuth Kumar, DEO, O/o the ERO Mahadevapura AC
- 9) Sri.Venugopal, DEO, O/o the ERO Mahadevapura AC
- 10) Sri.Muralidhara K, Assistant Commissioner, (Market) & SVEEP Nodal officer BBMP

- 11) Sri.Ravikumar, Director , Chilume Enterprises.
- 12) Smt.Aishwarya , Director , Chilume Enterprises.
- 13) Smt.Shruthi, B, Director , Chilume Enterprises.
- 14) Sri.G Gangaraju, Shirastedar, O/o the Deputy Commissioner, Bangalore Urban.
- 15) Sri.Sandeep, Personnel Assistant to DC Bangalore Urban.
- 16) Sri.Dharmesh, Employee, Chilume Enterprises.
- 17) Sri.Renuka Prasad, Employee, Chilume Enterprises.
- 18) Shri Umesh, AC Elections BBMP
- 19) AERO Marthahalli H.K. Nagraju (Retd)
- 20) Election Shirishtedar, DC Bengaluru Urban office

Replies to Queries :

- 1) Sri.Tushar Girinath, I.A.S., Chief Commissioner, BBMP and DEO Bangalore Urban.
- 2) Sri.Srinivas, K. I.A.S., Deputy Commissioner, Bangalore Urban District.
- 3) Sri.S.Rangappa, I.A.S., Special Commissioner (Admin) & ADEO Central, BBMP
- 4) Sri.S.G.Ravindra, I.I.S., Special Commissioner, Estate BBMP & Nodal Officer SVEEP in 2018-19
- 5) Shri Nandiesh Reddy, Chairperson BMTC
- 6) Shri Manjunath Prasad, IAS & former DEO & Commissioner, BBMP in 2018 – 2019 and current Principal Secretary to CM,
- 7) Shri Dayanand IAS, former ADEO Central and current ADEO & Deputy Commissioner Bangalore Urban. Replies are awaited.

Information from Police and other authorities like Commissioner, Commercial Tax, District Registrar, & Registrar of Companies, Karnataka:

a. Police

- 1) List of seized forms 6,7,8 (some filled up with voter details and large numbers of blank forms)
- 2) List of BLC ID cards issued for various constituencies: Shivaji Nagar, Mahadevpura, Chikpet, RR Nagara etc.

b. District Registrar

- 1) Registration deed of Chilume trust of the year 2013-14 & 2016-17

c. Registrar of Companies

- 1) Certificate of Incorporation for Chilume Enterprises.
- 2) Annual returns filed by Chilume Enterprises for the years ended 2017-18, 2019-

2020

& 2020-2021

d. Commissioner, Commercial Taxes

- 1) GST Registration Number and GST returns of Digital Sameeksha

Internet Resources:

- 1) You tube

a. <https://www.youtube.com/watch?v=8fwNGL1H3qw>

- b. <https://www.youtube.com/watch?v=bWpdJZYE2MM>
- c. https://www.youtube.com/watch?v=VI_WGDEIgCc

These training videos on You Tube provide (a) BLO JOB TRAINING (b) Booth Level Map Training (c) Training on digitization of Voter personal details (like caste, religion, mother tongue, contact, Adhaar, Opinion on MLA etc) and pop -up Booth Survey Data, Forms 6, 7, 8 data into an application called Digital SameekshaAPK

- d. www.godaddy.com
- e. <https://apkcombo.com/digital-sameeksha/com.digitalsameeksha/>
- f. <https://www.androidfreeware.net/download-com-digitalsameeksha.html>

Investigations Into Complaints

Chilume Educational, Cultural & Rural Development Trust (henceforth Chilume Trust for short) is a registered trust since 2013-14. However, it is not found in the National Repository of NGOs <https://ngodarpan.gov.in/> though it claims to be an NGO. It has other organisations attached to it as below:

- i. **Chilume Groups**
- ii. **Chilume Enterprises Pvt Ltd / DAP Hombale Pvt Ltd**
- iii. **Digital Sameeksha, Sole Proprietorship**
- iv. **Prajna Utility Developments & Management**
- v. **Kempegowda Groups & Services**

As per the registered Trust Deed, the aims and objectives of the Trust are:

- i. To establish Drama Institute
- ii. To establish Dancing & Singing School
- iii. To establish, manage & take over ITIs, Vocational Institutes, Coaching Classes, Schools, Colleges, Hostels etc
- iv. To establish & conduct courses in Kannada, English, Hindi, Arabic, Persian, Urdu Calligraphy
- v. To establish, manage & take over Libraries, Reading Rooms etc for spread of scientific, technical, cultural, moral, religious knowledge
- vi. To work for upliftment of minority community in particular

i. **Chilume Trust** is registered in July 2013 with the District Registrar, Bangalore. Its original Trustees were:

- 1. Sanjay S. s/o Srikantappa H
- 2. Ravikumar K. s/o Krishnappa (also Managing Trustee & Secretary)
- 3. Somasekharaiah s/o Siddaiah
- 4. Kempegowda K. s/o Krishnappa (brother of Ravikumar K.)
- 5. Raghu S. s/o Shivakumar

The Trust was re-registered in 2016-17 with some new members (Kotresh R, Prakash B.S., Kempamma, Anil Kumar R, Kemparaju T, Kemparaju G, all friends / family members of Ravi Kumar). Ravikumar K. continues to be the Managing Trustee. The Managing Trustee of Chilume Trust has maintained a set of dummy trustees and changed them in 2016-17. The Bank Account of the Trust is, 2ND CROSS, MALLESWARAM Branch, SBI Bank A/c No

000006411168243118. The Account statements from 24th February, 2015 to 4th Jan 2023 indicate the following:

1. 2015 to 2017:

- a. Receipt of Rs 2,25,000 in October 2016, Rs 2,25,000 in November 2016, Rs 5,00,000 in Jan 2017, Rs 5,00,000 in Feb 2017 and Rs 3,00,000 from Nandi Constructive Builders & Developers, and Shri Nandiesha Reddy NS (former MLA KR Puram from 2008 to 2013 and head of Nandi Constructive). This fact was reported by Shri Nandiesha Reddy in his Affidavit while filing his nomination for LAC Elections 2018. This expenditure is also a matter of complaint by KPCC to the CEO, Karnataka and has been confirmed by both Ravi Kumar of Chilume Trust and Shri Nandiesha Reddy. The latter has in his reply dated 13th Jan 2023 stated that he has availed the services of Chilume Trust & Chilume Enterprises in 2016 -17 after they approached him, for publicity of the works carried out by him in his constituency and also to "know the pulse of the people" in the context of his candidature for the 2018 elections. Further he has stated that he has not misused the services of Chilume Trust. The dates of the payments made do not correspond to any period of MCC with respect to any election and it is a fact that Shri Nandiesha Reddy transparently reported the matter to the ECI in his affidavit.
- b. However, the key violations of norms are apparent at the same time that a private Trust was appointed in 2016, 2017, 2018, and later in 2019, 2021 and 2022 for various services ranging from (a) Provision of BLOs (b) House to House Survey (c) VVIP (d) Utilisation of Voter App of ECI (e) SVEEP and connected subsidiaries (like Chilume Enterprises, DAP Hombale, Digital Sameeksha, Kempegowda Groups & Services etc) were appointed for various civil works and services like supply of Furniture, CCTV, Food & Water to Polling Booths, Counting Centre, Mustering & De-mustering on payment basis. It is also clear that there are risks in appointing private Trusts or NGOs for voter survey or awareness purposes as Chilume Trust which was appointed by the orders of various EROs & AEROs of BBMP to provide private BLOs for Summary Revision during 2016 -2018 on payment basis of Rs 6000 per BLO, were at this very time also conducting survey and awareness program for Shri Nandiesha Reddy. Hence it is clear that they used the access to voters gained by the orders of the EROs & AEROs to actually carry out public awareness and political propaganda and survey of the mood of voters for political purposes.
- c. In this regard, it may be noted that while Shri Nandiesha Reddy, as per his statement, paid Rs 1 lakh to Chilume Enterprises in 2016 & 2017 and Rs 17,50,000 to Chilume Trust, Chilume Enterprises did not even come into existence up to 3rd January, 2022 and its original company, DAP Hombale itself was incorporated only in 2018. It is more likely that Shri Reddy made the initial payments of Rs 1 lakh to an old unregistered organisation set up by Ravi Kumar K, called Chilume Group. This points to another key aspect of the operations of Shri Ravi Kumar K, his associates and Directors and the numerous organisations and companies and bank accounts they floated, that the entire operation was to create multiple entities for receipt and transfer of money as well as avoidance of tax and laundering. There are later occasions when for no ostensible reason certain officers of BBMP have appointed Chilume Trust for Door to Door Surveys at the cusp of a by-election or general

elections (a case in point being their appointment for SVEEP and promotion of Voter App in Jan 2021 by the then ADEO Central, for RR Nagara Constituency only, again “pro bono”, on the basis of a request letter given by them).

2. 2017 To 2018

- a. There are numerous dubious receipts in this period, particularly, Rs 5,00,000 deposited on 27th April 2017 by MARATHAHALLI Ward – Politician, Shri P A VENKATASWAMY REDDY, Rs. 3,00,000 deposited on 7th April 2017 by one Jagadeesh Sadana, apparently Director of C.J. Urban Living. However, the dubious aspect in both these transfers is that they are both made from the same Reference / Cheque Number, 99826406791, as the payments confirmed by Shri Nandiesha Reddy, as having been made on 25th Jan 2017, from his company Nandi Constructive and on 14th Feb 2017 by Shri Nandiesha Reddy himself. In addition, certain other deposits of Rs 5 Lakhs on 15th May 2017 from Chaithra H, Rs. 5 Lakhs from Shashikant on 16th October, 2017 and Rs. 5 Lakhs by Clearing / Cheque 911015, are inexplicable and require deeper analysis from a point of view of money laundering and tax evasion. Also, because over 50% of these receipts have been withdrawn by Cheque/ Cash to Ravi Kumar K’s Personal Accounts and amounts have been paid to various individuals, some of who are the same persons appointed as BLOs.

3. 2019 To 2020

- a. There are many instances of payments of large sums to sister organizations of Ravi Kumar K, e.g., Rs. 2 lakhs to Digital Sameeksha on 14th February 2020 and Rs 4 lakhs to DAP Hombale on 14th Feb 2020. On 29th April 2019, there is a receipt of Rs 7.68 lakhs from Additional Commissioner, on 7th June, Rs 6.25 lakhs from State Huzur Treasury (indicating Government Payments) and Rs. 10.99 lakhs from RBISOGOKAEP which is IFSC Code of RESERVE BANK OF INDIA, RBI, BENGALURU, GOVT OF KARNATAKA. These Treasury payments appear to be for paid works given to Chilume Trust by BBMP officials for election related activities including SVEEP.

4. 2021 To 2022

- a. There is a large payment of Rs 99.99 Lakhs made by BBMP Commissioner to Chilume on 13th Jan 2022, apparently for conduct of House to House Survey of Out of School Children in BBMP area, commissioned by Education Department. On 17th & 21st Jan 2022, Rs 46 Lakhs are withdrawn to personal account of Ravikumar in SBI.

5. 2022 To 2023

- a. There is a large payment of Rs 85.72 Lakhs made by BBMP Commissioner to Chilume on 11th August 2022, apparently for conduct of House to House Survey of Out of School Children in BBMP area, commissioned by Education Department. On 24th August, 2022, 49.99 Lakhs are withdrawn by Ravi Kumar K. This is a pattern seen in almost all companies and accounts associated with Ravi Kumar K, whereby payments from government are often withdrawn to various personal accounts and at later stages partial sums of money are transferred back to company account.

In sum, the Trust is a front to enter government survey work with pro bono pretences, often on basis of a self – actuated proposal and mere statements of commitment to social values.

Once entry is gained, it uses its access to various officials to garner paid works (no contractual agreements are found in the evidence though large sums of money are paid to them) without any tendering process, largely related to surveys and election related civil works and services (barricading, CCTV, furniture on hire, computer hire, food supply etc). It has run up huge bills running to over Rs 5 crore in both BBMP and office of DC Bangalore (Urban) largely since the 2019 Lok Sabha Elections. The Trust has also involved itself in paid surveys by Banks for Jan Dhan Account, Animal Census Survey for Animal Husbandry Department, School Drop-out Survey for Education Department, and other surveys for E Governance and Karnataka Marketing Federation and SVEEP since 2013. In order to canalize its payments both incoming and outgoing, the owner has opened a number of firms:

- ii. **Chilume Group** (Unregistered with GST allotted on July 1, 2017 29AYXPR3910M1ZG as the GST Number. The status of this GSTIN is Cancelled). Contact: 49 RAVI KUMAR R CHILUME GROUPS NO 1, 15TH MAINROAD, MATHIKERE LAYOUT, NEAR RAMAIAH COLLEGE, SUBBAIAH HOSPITAL MATHIKERE, BANGALORE

Email: chilumegroups@gmail.com

The social media accounts of Chilume Group are inactive for a few years:

Facebook & Twitter:

ravikumar k (@chilumegroups) / Twitter: from 2014

ಚಿಲುಮೆಗ್ರೂಪ್ಸ್ | Facebook: from 2012

Bank Accounts:Chilumegroups-2/ Canara Bank, Chilumegroups-3/Central Bank, Malleshwaram Branch

- iii. **DAP Hombale Pvt Ltd in 2018, renamed as Chilume Enterprises Pvt Limited** in 2022. It was incorporated officially on 15/12/2017. The corporate identification number (CIN) of this company as per the official records is U74999KA2018PTC109513 and the company registration number is 109513. Its email address is suryakn88@gmail.com and its registered office address is NO 261/1 2ND MAIN ROAD 17TH CROSS MALLESHWARAM Bangalore, 560003. It is an MCA (Merchant Cash Advance) provider company with the industrial and NIC / SIC code of 74999 as per the official records. The company has authorized capital of Rs 1.00 lakh and paid-up capital of Rs 1.00 lakh. Three close relatives associated with the organization: Byrappa Shruthi (Sister in Law and wife of Kempegowda), Krishnappa Ravikumar and Narasimhamurthy Aishwarya (Wife of K. Ravi Kumar) are presently associated as directors. Rangappa Anilkumar, previously director with DAP HOMBALE PRIVATE LIMITED, is registered with the Ministry of Corporate Affairs (MCA), bearing DIN 08004896. He has resigned from DAP Hombale / Chilume Enterprises though continues as Trustee in Chilume Trust. The registered office of Chilume Enterprises Private Limited is same as DAP Hombale.
- a. Ravi Kumar K seems to have floated these Companies to only show his wife, brother, brother's wife and a friend as Directors and to make payments to them to save tax. For the year 31st March, 2022 Rs 18.9 Lakhs is transferred to Shruthi (his sister in law) and Rs 12 lakhs to Aishwarya (wife). The Audited Accounts show an amount of Rs. **1,34,46,182** for the year ended **31st March, 2019**, as Trade Receivables from the **Deputy Commissioner Bengaluru Urban**. Trade receivables

are shown as Rs 76,53,667 for the year ended 31st March, 2020, from Digital Sameeksha – his own Sole Proprietorship. Thus, possibilities of generating unaccounted income, and money laundering exist.

- b. Similarly, for the year ended 31st March, 2021, Trade receivables show Rs 76,53,667 from the same Digital Sameeksha. As may be seen from bank statements, the receivables are partly transferred to Digital Sameeksha and then shown as receivable from it. Transactions of Rs 70 Lakhs are reported between Ravi Kumar and his Company as related parties for the year ended 31st March, 2022. In addition, multiple accounts in different banks are opened and large sums of money transferred to them when a payment is received.

Bank Accounts of DAP Hombale & Chilume Enterprises:

- i. DAP Hombale ICICI A/C No 007805008985
- ii. DAP Hombale Central Bank Of India Branch Malleswaram Bangalore
- iii. DAP Hombale Corporation Bank Malleshwaram 18th Cross Branch
- iv. DAP Hombale Malleshwaram branch HDFC Bank
- v. DAP Hombale Malleswaram branch Axis Bank
- vi. DAP Hombale Malleswaram branch Vijaya Bank
- vii. DAP Hombale, Union Bank A/C No 510101006922265, Malleshwaram 18th Cross Branch
- viii. DAP Hombale, Bank of Baroda, A/C, 89390200000007, Malleshwaram Branch
- ix. DAP Hombale, SBI, Malleshwaram Branch

Of the above accounts, DAP Hombale ICICI A/C No 007805008985, DAP Hombale, Union Bank A/C No 510101006922265 and DAP Hombale, Bank of Baroda, A/C, 89390200000007 are thoroughly analysed and the following suspicious transactions are noted:

1. In the Union Bank of India Account, there are three payments by Addl Commissioner & District Election Officer from 2nd December 2019 to 20th March 2019 of Rs 11 lakhs ostensibly for provision of services in the Elections to Lok Sabha in 2019. At the same time Rs 10.75 lakhs are withdrawn by self-cheques during the same period and a transfer of Rs 2 lakhs is made on 12th Feb 2021 from the DAP Hombale A/c of ICICI bank. Again, certain payments are made and two cash infusions totalling Rs 4 lakhs are made from the accounts of Aishwarya (w/o Ravi Kumar) and DAP Hombale SBI Malleshwaram Branch.
2. With respect to the Bank of Baroda, Malleshwaram Branch, on 5th Nov 2019, Rs 3.5 lakhs are deposited by Ravi Kumar from his personal account and immediately, transferred back. Similar action is repeated for Rs 2 Lakhs a few days later.
3. The main account is the DAP Hombale ICICI A/C No 007805008985 which is analysed in detail:

	Withdrawals	Deposits	Remarks
TOTAL 9th Feb 2018 to 15th Nov 2022	83276497.99	87463092.33	4186594.336

Of Which			
Government Receipts		7,54,53,767.00	86.3%
Transfer to Self/Family/Other Accounts of Owner	3,49,08,017.8		41.9%
Receipts from Self/Family/ Other Accounts of Owner		62,66,499.00	7.2%
Payments to Others	4,83,68,480		58.1%

- a. 86% of the receipts of Rs 8.74 crore of this one account of DAP Hombale / Chilume Enterprises has accrued from payments by Government Agencies for various Surveys and election related services, mainly SVEEP. This is reflected only partially in the Audited Accounts of DAP Hombale / Chilume Enterprises for 2020 & 2021 indicating mis-reporting.
 - b. The payments made by DAP Hombale / Chilume Enterprises to various parties including operational expenses, loan repayment and TDS for services rendered is about Rs. 4.83 crore i.e., 58.1% of the total. The amounts withdrawn by cash/ self-cheques and transfers made to accounts of sister concerns, largely Digital Sameeksha, total about Rs 3.49 crore, i.e., 42% of withdrawals. About Rs. 63 lakhs (7.2% of Receipts) have been received by DAP Hombale / Chilume Enterprises from family and Director's personal accounts and other sister concerns for no ostensible services rendered. Thus, personal accounts have been mixed with company income and expenditure as also with sister concerns which are neither registered nor having audited accounts. This appears prima facie to be a recipe for tax evasion and money laundering.
 - c. Importantly, most of the survey contracts and SVEEP orders are obtained by Chilume Trust specially with the SVEEP orders being "pro bono" services. Yet the Audited Accounts of DAP Hombale / Chilume Enterprises show receipts for Survey and SVEEP.
- iv. **Digital Sameeksha**, Sole Proprietorship seems to have been set up in 2017/ 2018. It is registered with GST on 9th Feb 2018 for "Construction Services" with email as digitalsameeksha@gmail.com and same address as DAP Hombale / Chilume Enterprises. In the GST Registration Form Ravi Kumar has given his name as the Legal Name of the Business and Trade Name is given as Digital Sameeksha. Here also, majority of the receipts are from Govt., ostensibly for conducting Surveys and election work.

TRANSACTIONS IN RAVI KUMAR / DIGITAL SAMEEKSHA CANARA BANK ACCOUNT NO. 0787101042289

S. No.	Date	Amounts Paid	Amounts Received	Details
1	16 Jul 16	15,000		Dr C N Ashwatha Narayan Foundation
2		10,000		Malleswaram Sports Foundation
3	11 Jul 17		6,150	Tahsildar
4	11 Jul 17		6,150	Tahsildar
5	11 Jul 17		6,150	Tahsildar
6	11 Jul 17		6,150	Tahsildar
7	11 Jul 17		6,150	Tahsildar

8	21 Oct 17		5,00,000	Accounts Section
9	27 Oct 17	2,31,500		SRS Communications
10	18 Jan 20		64,673	Bengaluru North Sub Treasury
11	7 Aug 20		16,32,135	AAE – BBMP
12			63,395	E Governance
13	29 JAN 21		74,892	E Governance
14	13 May 21		82,326	E Governance
15	12 Aug 21		95,254	BBMP COMMISSIONER
16			95,254	BBMP COMMISSIONER
17	18 AUG 21		42,664	E Governance
18	24 AUG 21		95,254	BBMP COMMNR
19			92,028	BBMP COMMNR

Serial numbers 3 to 8 appear to be payments for provision of Private BLOs. Records of the other receipts from BBMP and E Governance could not be traced. In addition to this there are numerous transactions to and from Accounts of DAP Hombale / Chilume Enterprises and that of Chilume Trust as shown below:

Date	Particulars	Payments	Receipts
	Current 007805008985 - ICIC0000078 DAP Hombale		
08-08-2019	NEFT-AXIR192207056525-DIGITAL SAMEEKSHA-LOAN-	0.00	99,999.00
05-10-2019	INF/NEFT/021579994771/Sameeksha /UTIB0000227/	75000.00	0
10-10-2019	INF/NEFT/021593688721/Sameeksha	429000.00	0
28-11-2019	NEFT-AXIR193323770063-DIGITAL SAMEEKSHA-LOAN PAYME	0.00	10,00,000
21-02-2020	NEFT-AXIR200525218347-DIGITAL SAMEEKSHA-LOAN PAYME	0.00	9,99,999
02-03-2020	RTGS:ICICR42020030200654731/Digital Sameek	2850000.00	0
20-03-2020	RTGS:ICICR42020032000273464/Digital	439000.00	0
20-03-2020	RTGS:ICICR42020032000274904/Digital	350000.00	0
20-03-2020	RTGS:ICICR42020032000275445/Digital	489000.00	0
20-03-2020	RTGS:ICICR42020032000276632/Digital	450000.00	0
05-05-2020	RTGS:ICICR42020050500271892/Digital	1499999.00	0
07-05-2020	RTGS:ICICR42020050700390435/Digital	399999.00	0
14-07-2020	RTGS-UTIBR52020071400690033-DIGITAL SAMEEKSHA- 9190	0.00	2,01,000
14-09-2020	MMT/IMPS/025816656356/50000/DIGITAL SA/Axis Bank	0.00	50,000
12-10-2020	MMT/IMPS/028617689565/DIGITAL SA/Axis Bank	0.00	35,000
16-11-2020	MMT/IMPS/031907983944/payment service/DIGITAL SA/A	0.00	50,000
19-02-2021	NEFT-AXIR210503774410-DIGITAL SAMEEKSHA-GTS	0.00	21,00,000
09-06-2021	MMT/IMPS/116015462759/Okloan/DIGITALSAM/Axis Bank 0.00	0.00	1,40,000
05-09-2022	INF/NEFT/029219154481/SBIN0040017/DIGITALSAMEEKSH	50000.00	0
		Payments	Receipts
	TOTAL 9th Feb 2018 to 15th Nov 2022	7229143.73	4885998

CHILUME TRUST A/C No:00000064168243118

SI.NO	Date	Amount	To	
94	14-Feb-20	2,00,000	DIGITAL SAMEEKSHA	Payment

Thus, there is clear evidence of deliberate flow of money from account to account (both business and private) with objective of rendering source of income untraceable, avoidance of IT and possibly laundering. The Digital Sameeksha Account has also received large sums from one Hombale Films and Raj Dharma Analytica both of who belong to a large business enterprise, Hombale Group, which however does not otherwise have any link or common Board Member with DAP Hombale / Chilume Enterprises. The Directors of Hombale Films and Raj Dharma Analytica have provided invoices given by Digital Sameeksha for services rendered of Manpower for Film Promotion amounting to Rs. 10.5 lakhs and Rs. 5.9 lakhs which adequately explains these entries.

- v. **Kempegowda Groups & Services** (with GST Certification) appears to have started in 2020 with Bank Account in Axis Bank A/C No:920020007490696 and Ravi Kumar's Brother and husband of Shruti, Chilume Trustee, Kempegowda K as sole proprietor. Similar pattern of transactions are seen for Kempegowda Groups & Services which works for election related services in BBMP and office of DC Bengaluru Urban – provision of food, furniture, barricading, computers & manpower on hire for VVIP etc. The payments appear to be for services rendered during the By – Elections.

KEMPEGOWDA GROUPS AND SERVICES A/C No:920020007490696				
SI.NO	DATE	AMOUNT	TO	
1	23-09-2020	2,21,975.00	AYUSHYA TECHNOLOGIES	Receipt
2	25-09-2020	39,955.50	AYUSHYA TECHNOLOGIES	Receipt
3	15-03-2021	72,795.00	STATE HUZUR TREASURY KHAJAN	Receipt
4	18-03-2021	22,679.00	STATE HUZUR TREASURY KHAJAN	Receipt
5	09-04-2021	16,00,000.00	SELF	Payment
6	11-06-2021	49,000.00	SHRUTHI	Receipt
7	19-03-2021	6,76,015.00	BENGALURU URBAN TREASURY	Receipt
8	20-03-2021	2,00,000.00	self	Payment
9	21-03-2021	1,000.00	SHRUTHI	Payment
10	23-03-2021	25,000.00	SHRUTHI	Payment
11	23-03-2021	25,000.00	SHRUTHI	Payment
12	23-03-2021	78,288.00	MANASA N	Payment
13	31-03-2021	57,675.00	BENGALURU URBAN TREASURY	Receipt
14	29-07-2021	2,83,000.00	RAVIKUMAR	Receipt
15	17-11-2021	10,000.00	AISHWARYA	Receipt
16	15-07-2022	1,15,000.00	KEMPEGOWDA	Receipt
17	23-07-2022	3,08,039.00	NACH	Receipt
18	25-07-2022	3,00,000.00	SELF	Payment

- vi. **Prajna Utility Development & Management** is a Sole Proprietorship of Dharmesh B.V. with GST Certification No 29AJAPD7469F1Z4 from July 2018 with address: No 21, 11th Cross Road, 2nd Main Road, KEB Office Road, Bhuvaneshwari Nagar Bangalore - 560085 and Bank Accounts: eVijaya bank A/C NO:156601013000024 & BANK OF BARODA A/C NO:74670200000184. Dharmesh B.V. is a recent collaborator of Ravi Kumar & Chilume and its subsidiaries and has his social media accounts as follows:

Dharmesh BV (@bv_dharmesh) / Twitter (unused)

Dharmesh BV Dakshu | Facebook (unused)

The analysis of the Bank Accounts also indicates major receipts from Government sources.

SI.NO	DATE	AMOUNT	TO	
			PRAJNA UTILITY DEVELOPMENT AND MANAGEMENT eVijaya bank A/C NO:156601013000024	
			PRAJNA UTILITY DEVELOPMENT AND MANAGEMENT BANK OF BARODA A/C NO:74670200000184	
1	23-12-2019	2,000.00	HDB/DHARMESH B V	Receipt
2	21-03-2020	10,00,000.00	GOODS SERVES	Receipt
3	15-04-2020	1,50,000.00	PUSHPAVATHI Y M	Payment
4	16-04-2020	10,000.00	puttaraju	Payment
5	22-04-2020	10,000.00	Darmesh BV	Payment
6	02-05-2020	5,000.00	Darmesh BV	Payment
7	02-05-2020	10,000.00	Kotresh R	Payment
8	04-05-2020	2,38,000.00	INDUSIND BANK LTD	Payment
9	28-05-2020	31,458.00	NEFT-DIGITAL SAME	Receipt
10	09-08-2020	3,01,055.29	A/C MIGRATED TO BOB :74670200000184	Payment
11	09-08-2020	3,01,055.29	MUMBAI	Payment
12	13-10-2020	2,00,000	SHIVRAJU C	Payment
13	11-02-2021	37,53,589	FORTAP MUMBAI	Receipt
14	15-02-2021	50,000	OWN	Payment
15	15-02-2021	50,000	OWN	Payment
16	15-02-2021	1,00,000	OWN	Payment
17	17-02-2021	6,72,000	SERMAS	Payment
18	17-02-2021	6,72,000	SERMAS	Receipt
19	19-02-2021	1,00,000	OWN	Payment
20	19-02-2021	6,41,440	SATY	Payment
21	19-02-2021	6,72,000	LAXM	Payment
22	12-03-2021	2,00,000	JAYANA BANGALORE	Payment
23	06-10-2021	1,90,000.00	SERBAN-BANGALORE	Payment

DAP Hombale /Chilume Enterpriseswith paid up capital of Rs 1 lakh only, without any legitimate business activities as per available accounts and audit reports, carry huge liabilities on their books and have routed through their bank accounts large amounts of cash. Kempegowda Groups & Services is a front organisation to apply for and carry out election related civil and other supplies

for Mustering, De-mustering, Counting, Polling Stations. They submit quotations along with DAP Hombale and Digital Sameeksha and one of these three (all owned and managed by the same person/s) often receive the order from officials for activities worth lakhs, ultimately. Certain works are farmed out to PRAJNA UTILITY DEVELOPMENT AND MANAGEMENT. A case in point is the order work issued to Kempegowda Groups & Services on 29th September 2020 by BBMP Election Section in the context of the RR Nagara By election on 3rd Nov 2020, for provision of food, facilities etc for EVM Preparation & Commissioning, Mustering, De-Mustering, Counting etc. Quotations were taken from the companies belonging to Ravi Kumar, viz DAP Hombale, Digital Sameeksha and Kempegowda in violation of all procurement norms and KTPP Act & Rules. With more than a month to go for elections, it is not clear why tenders were not called.

Chronology of Operations of Chilume Trust & its Subsidiaries in BBMP

- a. Chilume Trust has no employees and utilises the services of staff of DAP Hombale / Chilume Enterprises, who work for unspecified salaries often without any appointment orders. Most of the activities they engage in are through temporary hire of unemployed youth in case specific manner and by sub-contracting other NGOs. One such NGO, Samanwaya Trust's complaint precipitated this investigation.
- b. Private persons engaged by Chilume Trust have been appointed in place of government BLOs by order by AEROs with actual BLO cards issued to them by AEROs in the context of Summary Revision in 2016-17. Copies of these orders are retrieved from the owner of Chilume Trust and the designation in the ID Cards mentions "NGO Worker".
- c. In 2017-18 again, various AEROs have appointed Chilume to supply BLOs to go along with regular BLOs for house to house survey with the ECI's BLO Duty List attached to the orders.
- d. On 22nd December 2018, Chilume Trust were appointed as pro bono SVEEP NGO with certain conditions, for SSR for Lok Sabha Elections of 2019 by the then Commissioner & DEO, BBMP. Chilume Trust sent a proposal to CEO, Karnataka whereupon, the SVEEP Nodal Officer in CEO office forwarded the same for a report to BBMP. The then SVEEP nodal officer of BBMP processed the proposal and recommended their appointment as SVEEP NGO without detailed and independent enquiry into their antecedents.
- e. In March 2021, with no Assembly or Parliament election in sight, the SVEEP Officer, CEO Office Karnataka, Shri Vastrad IAS (Retd) forwarded a request by Chilume Trust for carrying out SVEEP for BBMP elections (which is the responsibility of the State Election Commission).
- f. In November 2021, Chilume Trust was appointed pro bono by the then ADEO Central on the Trust's request without any independent verification of their antecedents, for 154 RR Nagara only, to carry out door to door survey of voters which requires a detailed enquiry on its own.
- g. In January 2022, the then ERO Mahadevpura, quoting the 2018 order for SVEEP for Lok Sabha elections, issued an order appointing Chilume Trust for door to door survey. In June, 2022 EROs Mahadevpura, Shivajinagara and Chikkapete issued ID Cards for "Booth Level Coordination Officer", a designation which itself is false. All norms and guidelines were violated regarding issue of ID Cards and also, no records of persons issued to were kept, thereby effectively putting the survey work to great

risk of manipulation. In September, about 12 such ID cards were issued by the then DC Bangalore Urban, Shri Srinivas IAS under his own seal and signature, though denied subsequently in his statement.

- h. On a request by Chilume, on 16th August, for SVEEP work, again they were recommended by the Special Commissioner, Elections, BBMP and SVEEP Nodal officer, BBMP to the Chief Commissioner & DEO, BBMP in two days without independent assessment of their antecedents and were appointed pro bono with certain conditions (repeated from 2018 order) but with the added schedule of actual SVEEP activities they were expected to carry out.

A case in point is the action of Tahsildar KR Puram, N. Tejesh Kumar, in his order ELN/ CR/ 26 / 2017-18 dated 15th September, 2017 for KR Puram Taluka of 174 – Mahadevpura. It is to be noted that the Tahsildar had written to the DC Bengaluru Urban on 10th July 2017 seeking permission to replace regular BLOs of KR Puram with private BLOs from Chilume Trust based on request letter recounting their survey activities in BBMP. While the DC did not approve this, on the contrary in an election preparedness meeting dated 12th July, 2017, the ADC Bengaluru Urban referred to a complaint received by e-mail from Dr. Renuka Vishwanathan, retired IAS officer regarding the activities of a private NGO (presumably Chilume Trust) who were being used by BBMP to carry out House to House Voter survey as BLOs, with official BLO ID Card issued by BBMP and that the survey involved collecting personal data of voters including phone numbers. The complaint was also about the lack of political neutrality in the exercise. This complaint would possibly have been received by the CEO also at that time. The ADC directed all EROs and AEROs to enquire and take action regarding the same. Yet the Tahsildar, KR Puram, who was part of this meeting went ahead and issued the above mentioned order dated 15th September, appointing Chilume Trust for provision of private BLOs. In his reply statement, N. Tejesh Kumar while accepting that he had signed the order, has stated that it was done in “good faith”. Clearly, this is not an acceptable reply in view of the facts. Also, Anil Kumar, member of Chilume Trust has accepted in his statement that he had written to Tahsildar, KR Puram and had provided private BLOs for 4 to 5 months at Rs 6000 per person as well as for SVEEP awareness at Rs 500 per day.

The said order clearly states that Chilume Trust was to appoint BLOs in vacant places in 94 Polling Stations of 174 – Mahadevpura and carry out Electoral Roll Revision as per orders of DC Bengaluru Urban and ECI. The “Duties & Responsibilities of BLOs” as available in the ECI’s BLO Manual are copied into the order. Similar orders have been issued by AERO Whitefield, G.S. Siddlingappa on 27th September, 2017, and AERO Shivajinagar Smt Jyothi Laxmi in January 2018 who have both denied signing the order in their statements. Then AERO Marthahalli H.K. Nagaraju has admitted his mistake in signing an order to appoint BLOs through Chilume Trust in September 2017 and has pleaded ignorance of the norms in his reply. He has also stated that many other AEROs have done the same and that there was some kind of oral direction from EROs to do it. It is to be noted that Chilume Trust was employed by Shri Nandiesh Reddy, an aspirant for the upcoming elections at about the same time for creating awareness in and to know the pulse of the voters.

It is also to be noted that for the entire 2018 elections, in the report on SVEEP conducted by DC office, there is no mention of any activities by Chilume Trust. In other words, in actual SVEEP activities, Chilume was absent. However, there is evidence culled from old e-mails of BBMP where Chilume Trust had been emailed lists of young voters with their phone numbers by ERO KR Puram

on 10th Jan 2019. The sharing of phone numbers of voters with a private organisation is itself a serious violation of procedure.

In November 2018, Chilume Trust were appointed as pro bono SVEEP NGO with certain conditions, for SSR for Lok Sabha Elections of 2019 by the then Commissioner & DEO, BBMP. Chilume Trust sent a proposal to CEO, Karnataka whereupon, the SVEEP Nodal Officer in CEO office, Shri Vastrad IAS (Retd) forwarded the same for a report to BBMP. The then SVEEP nodal officer of BBMP, Shri Ravindra IIS, processed the proposal and recommended their appointment as SVEEP NGO without detailed and independent enquiry into their antecedents. This was approved with conditions of political neutrality and adherence to norms by the then Commissioner & DEO, BBMP, based on the recommendation of the SVEEP nodal officer.

Chilume Trust also attached the same letter from Shri Vastrad to their request and sent it to DC Bengaluru Urban as well, though the DC forwarded the letter to the CEO, ZP Bengaluru Urban for necessary action.

While Chilume were apparently providing pro bono SVEEP support, in March 2019, a quote was taken from Chilume Trust dated 27th March 2019 and an order was issued by ADEO (North) to appoint them for SVEEP / VVIP (*sic*) from 29th March to 13th April. On 25th May, 2019, their bill of Rs. 6.38 lakhs was approved for payment by the ADEO (North).

On 6th March 2021, with no Assembly or Parliament election in sight, the Nodal SVEEP Officer, CEO Office Karnataka, again forwarded a request by Chilume Trust for carrying out SVEEP for BBMP elections (which is the responsibility of the State Election Commission) to the Commissioner BBMP & ADEOs with direction to take appropriate action.

In November 2021, again Chilume Trust was appointed pro bono by the then ADEO Central Shri Dayanand IAS, on the Trust's request without any independent verification of their antecedents, for 154 RR Nagara only, to carry out door to door survey of voters using VHA. This order is blatantly wrong and misleading as by election to RR Nagar was completed and there was no palpable requirement for SVEEP, that too in a single constituency. Further, the order of the ADEO Central has no reference to any authority, but for a request letter from Chilume and alleged reports from AERO & ERO, which merely refer to the Chilume request in the notings file. In fact, the then AERO, Gultaj Fatima H has stated that she was not involved in decision making on SVEEP and had not done any kind of enquiry in the said matter nor examined documents of Chilume and that there was no election urgency at that time. It is also learnt that an office room was allotted to Chilume Trust in the Joint Commissioner and ERO's office in RR Nagar, which became their base of operations till it was raided and materials including BLO cards, unfilled and filled up Forms 6, 7, 8 were seized in thousands by the DCP Bangalore Central in November 2022. It is noteworthy that this order of ADEO Central has been quoted by the ERO Mahadevpura as authorization to issue his order dated 29th Jan 2022.

On January 29th 2022, the then ERO Mahadevpura, Chandrasekhar quoting an order of ADEO and Commissioner dated 20th November 2021 and Chilume's request letter dated 29th Jan, issued an order to Chilume Trust to work along with BLOs for SSR and SVEEP for 2023 LAC elections. The entire order seems to be deliberately designed by the ERO to grant entry to the Chilume workers into the process of SSR, though ostensibly in the guise of SVEEP. The said ERO followed this up with another enabling order to Chilume on 2nd March 2022 to carry out door to door visits and

cover 100% applications through VHA with directions to all Households, Apartment Associations and Resident Welfare Associations to cooperate. He followed it up with similar order in English on 6th April, 2022 so that the non-Kannada residents would also understand. In June, 2022 EROs Mahadevpura, Shivajinagara and Chikkapete issued ID Cards for "Booth Level Coordination Officer", a designation which itself is false ostensibly because the Chilume workers were facing opposition from residents.

In his statement, the ERO Mahadevpura, Chandrasekhar K stated that while he had not monitored the activities of Chilume nor had he directed his subordinates to check the activities. He also stated the order was for addition of voters in roll besides SVEEP. He had received a few complaints from WhiteField Residential Welfare Association and politicians regarding house to house survey that the surveyors were not having I Cards, though not in writing. The said official has admitted that instead of monitoring the activities and ensuring coordination with BLOs he instead issued 80 ID cards on the oral request of Chilume. The official has also admitted that his order is given in the context of the production of permission letter by Commissioner BBMP on 22nd December 2018 and that of DC Bengaluru Urban on 14th December 2018. Both these are misleading as the order of BBMP Commissioner was in the context of the Lok Sabha elections only and that of DC was merely a forward to the CEO ZP Bangalore Urban. The issue of ID cards is thus a serious contradiction of the ERO's own order which states that the Chilume workers would accompany regular BLOs.

All norms and guidelines were violated regarding issue of ID Cards and also, no records of persons issued to were kept, thereby effectively putting the ongoing H2H survey work to great risk of manipulation. In September, about 12 such ID cards were issued by the then DC Bangalore Urban under his own seal and signature, though denied subsequently in his statement. However, Gangadhar, Election Shirishtedar in DC Bangalore Urban office has stated that it was at 3 pm on an office day when he was present with Ravi Kumar and Dharmesh of Chilume that the DC Shri Srinivas IAS signed the cards and placed his seal. This fact is corroborated by Ravi Kumar in his statement that he met the DC with Dharmesh in September at about 3 pm and got 14 cards signed. Even Sumangala of Samanwaya Trust stated that her 10 surveyors were given ID Cards signed by DC Bangalore Urban.

On a request by Chilume, on 16th August, for SVEEP work, again they were recommended by the Special Commissioner, Elections, BBMP and SVEEP Nodal officer, BBMP to the Chief Commissioner & DEO, BBMP within two days, without independent assessment of their antecedents and were appointed pro bono with certain conditions (repeated from 2018 order) but with the added schedule of actual SVEEP activities they were expected to carry out.

In his reply to queries, the Chief Commissioner & DEO BBMP, Shri Tushar Girinath, IAS has stated the following:

- i. The order to Chilume Trust was issued based on the recommendation on file by the SVEEP Nodal Officer and Special Commissioner, Admin & Elections and as explained by the latter, the synergy to be gained from combining SSR and Aadhaar linking through a SVEEP campaign in the backdrop of ECI instructions dated 4th July 2022 and 28th July 2022 and in the context of multiple precedents of orders to Chilume Trust for Government Surveys and SVEEP since 2018.

- ii. It was pro bono, on condition of political neutrality and schedule of SVEEP activities to be conducted were enumerated, no house to house survey or ID Cards were sanctioned while strict oversight of Government BLOs was maintained.
- iii. It was done with bonafide intentions trusting the briefing by subordinates
- iv. The complaint by Samanwaya Trust and report sought by CEO was not brought to notice of the DEO till around last week of October when by chance a Journalist mentioned it.
- v. Immediate action was ordered to be taken by the Special Commissioner Admin & Elections Shri Rangappa IAS and follow up was done again on 31st October.
- vi. 1st November being a public holiday and having to go to Lucknow from 2nd to 4th November due to a serious personal tragedy, follow up was done over phone. On 4th November, it was reported by Shri Rangappa IAS that the order was cancelled by him on the 2nd itself.

Shri Rangappa IAS in his reply to queries has stated the following:

- i. He was aware of the complaint by Samanwaya Trust to AC Elections BBMP but does not mention the reference from CEO.
- ii. On behalf of DEO, he has cancelled the order to Chilume as per SVEEP Nodal officer recommendations on 2nd November.
- iii. Based on the earlier orders to Chilume Trust from 2018 to 2021, and there being no complaints against them, he “genuinely believed” that it was a trustworthy organisation.
- iv. He has not issued or authorised issue of any ID cards, nor was aware of any ID cards till the complaint was received on 10th November 2022.
- v. He has never met any person from Chilume Trust

On cross verification with other documents, it is found that

- (a) Shri Rangappa and the SVEEP Nodal officer of BBMP have displayed the same lack of due diligence and awareness about ECI’s SVEEP guidelines as some earlier officers have and have recommended an organisation without check of antecedents
- (b) The need for SVEEP by an NGO was not felt, nor were any efforts being made to rope in an NGO till Chilume Trust made a self-actuated proposal which was processed in just 4 days.
- (c) At the same time there was no such alacrity shown by Shri Rangappa or the SVEEP Nodal Officer in enquiring into the complaint of Samanwaya given to AC Elections and the DEO was not even informed of either the CEO’s email or the complaint filed with the AC. Surely, the Special Commissioner would have read the contents of the complaint and seen the references made to ID Card and House to House Survey. Yet in his reply, he claims he knew nothing about ID cards till 10th November well after cancelling the order to Chilume.
- (d) Further, the date of cancellation, 2nd November, 2022 as stated by Shri Rangappa is not borne out by other statements and documents:
 - i. Shri Tushar Girinath IAS as stated that on 3rd November, 2022 he had followed up with Additional CEO

- ii. The email record of BBMP's official email indicates that the order was actually mailed on 4th November
- iii. Smt Sumangala the complainant has stated on record that on the 3rd November, Ravi Kumar and Dharmesh arrived at her house at 11.30 am putting pressure on her till 5.30 pm to cancel the complaint and go with them to meet Shri Rangappa to convince him not to issue cancellation order. She admitted she reluctantly withdrew her complaint under duress on 3rd November by e-mail to CEO. However, she did not withdraw her complaint to BBMP.
- iv. Shri Ravi Kumar & Dharmesh in their statements have corroborated this partially and have also claimed that they met Shri Rangappa and the SVEEP Nodal Officer.
- v. Shri Umesh, AC Elections BBMP has also corroborated that the complaint by Samanwaya was received on 21st September and sent the very same day to Nodal Officer SVEEP for enquiry, who gave opinion for cancellation on 7th October, after 16 days, whereupon the file was submitted to Special Commissioner Admin, Elections and ADEO Central Shri Rangappa on 11th October 2022. However, he called for discussion and directed AC to summon the Chilume Trust for discussion and they came on 13th Nov and were waiting outside ADEO Central's office.

The SVEEP Nodal officer has also taken a lot of time to examine the complaint and has given repeated opportunities to Chilume Trust to answer the points. The due diligence required was not done at the time of initial examination of Chilume Trust's proposal as admitted by him. After receiving the complaint, two days were given to Chilume for clarification, then 3 days were spent studying the email, then further time was taken after he directed Samanwaya Trust to submit evidence in support of their allegations. Thereafter he waited 6 days for Chilume's reply. Thus, the SVEEP Nodal officer had kept the file for 16 days and Shri Rangappa kept it for discussion with Chilume Trust even after recommendation to cancel for 23 days before finally cancelling the order on behalf of DEO allegedly on 4th November.

Modus Operandi: Chilume Trust and its Subsidiaries and Partner Organisations

From the information available so far, the activities of Chilume in BBMP with respect to SVEEP and election work go back to 2017. Their modus operandi is to give a voluntary letter to key authorities, often innocuously worded in general terms about their commitments and activities and obtain some kind of forwarding letter which is then presented to lower level authorities as an endorsement to obtain documentary permissions. Their main objective in the guise of voter awareness appears to be data collection from voters and creation of voter database and to commercially utilize this data possibly for election candidates. They pose as surveyors (in census, animal census, Jan Dhan for Banks, CSC, Adhaar linking etc) and seek entry by offering their services for elections pro bono but compensate for this by obtaining various other paid projects and activities some involving core election activities like Summary Revision. They seem to be able to influence and mould the decisions of officials at various levels to achieve these objectives so much so that some of the glaring inconsistencies in their proposals are ignored or not diligently examined while contracting them. Sumangala KH, the complainant has stated that Chilume Trust sub-contracted their surveys as they lacked manpower on their rolls and had promised Rs 15 to 20

thousand per month per surveyor including accommodation and food which was provided for a few days though no remuneration was given. This is indirectly corroborated by Anil Kumar, former Director of the Trust that Rs 500 per day was paid for food etc for SVEEP and Rs 6000 lumpsum for BLO work.

Some of the activities that they included were not within the ambit of SVEEP and generally require considerable funding support, yet these were proposed as part of their SVEEP campaign free of cost:

- i. **Creation of Booth Awareness Groups (BAGs) and equip them with “communication material and other resources”:** This activity proposed by Chilume is contrary to the ECI directions dated 29th May 2015 replacing VAGs & WAGs with BAGs to be formed by BLOs after declaration of election based on a plan for ethical voting drawn up by the DEO. It is also contrary to the SVEEP Manual August 2016.
- ii. **Advertisement through banner and poster:** For 28 constituencies this would involve huge funds and it is not clear why any BBMP officer did not question this claim and also as the SVEEP campaign content is strictly approved by ECI.
- iii. **Media campaign:** This would involve huge funds and it is not clear, nor did any BBMP officer question this claim and also as the SVEEP campaign content is approved by ECI.
- iv. **Special focus on youth, women and PWD through “inter personal communication”:** Again, a claim involving direct contact with voter, which is not the objective of SVEEP.

As seen from the above, the Chilume Trust has in its proposal, intentionally used the very items of SVEEP strategy given in the SVEEP Manual of August 2016 but made key modifications by eliminating the approval of CEO and that of ECI for content. **This unfortunately was not noted or examined by the BBMP authorities while preparing their approval. Nor were the guidelines of engaging CSO partners followed meticulously. There is evidence that due diligence was lacking from BBMP officials who were tasked with scrutinizing their proposals and a thorough departmental enquiry is required to determine whether this is due to negligence or heavy work load or even deliberate. In the case of EROs and AEROs, it appears deliberate avoidance of the rigour of election work by simply delegating these statutory tasks to a private organisation.**

- a. The orders have been occasioned by request letters from Chilume Trust. The fact that they are the only organisation in a metropolitan city, to make such requests should have been noted.
- b. The antecedents of Chilume, basic documents, none of these are found on the files of even the senior officers.
- c. The claims of experience in survey is also not examined. In some letters Chilume have claimed experience in various surveys including the census in 2010 & 2011, both of which pre-date their date of registration in 2013.
- d. The very fact that a single person, Ravi Kumar K was visiting these offices as representative of Chilume Trust and also collecting orders and payments for various works and activities on behalf of four other organisations also does not seem to have raised any doubts.
- e. The complaints by public to ERO Mahadevpura and other officials also have not encouraged these officials to enquire or monitor the activities of Chilume or ensure that their surveyors were accompanied by regular BLOs. Even the action taken on

the serious complaint of Sumangala KH though made on 20th September 2022 and forwarded by CEO, was not acted upon with any urgency till brought to the notice of the Chief Commissioner BBMP by a journalist.

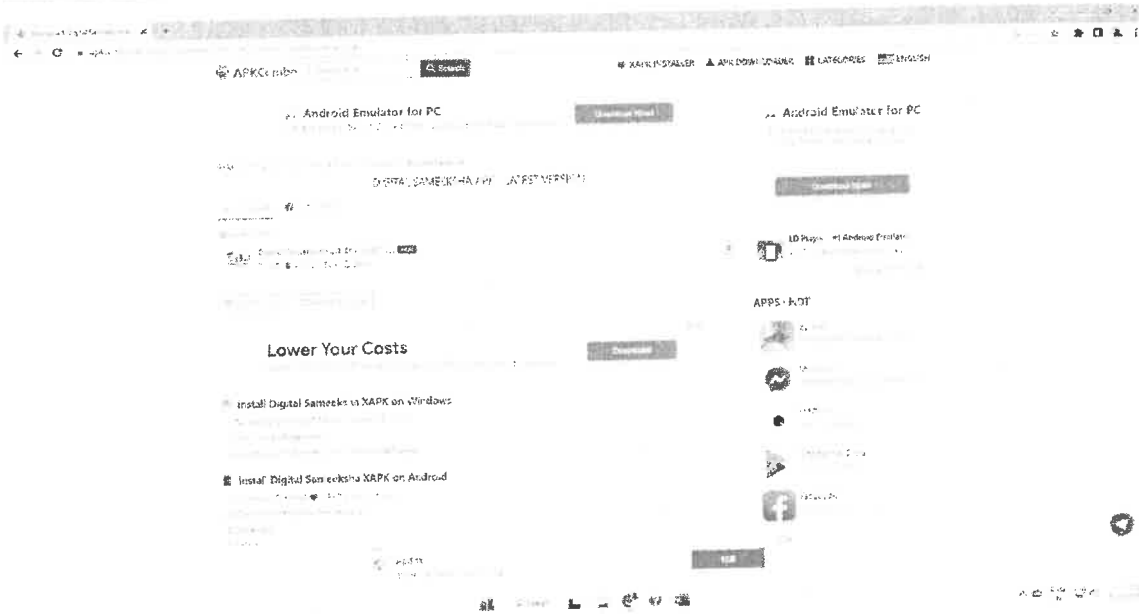
- f. There seems to be a serious lack of awareness among the scrutinising officials about the guidelines and norms of SVEEP as meticulously prepared and issued by the ECI. This fool proof document if followed itself would prevent even minor mistakes.
- g. The EROs & AEROs of BBMP are only keen about the revenue and tax collection duties and are apathetic about election work. Even in operation of ERO.net, many EROs who were questioned rarely sat before the screen but merely communicated the OTP to their DtEOs who did the rest. The DtEO who is a contract employee is now the most influential person in ERO.net operations.
- h. No heed was paid to the complaint by Dr Renuka Vishwanathan IAS (Retd) way back in 2017 regarding the kind of survey being done by Chilume Trust regarding personal details.
- i. In sum, given the general apathy for norms and rules regarding election activity among so many BBMP officials, contrasted with their alacrity in recommending the dubious claims of Chilume Trust to decision making officers without due diligence and combined with the reluctance to urgently take punitive action against Chilume are together indicative of either a lack of commitment for election work or some kind of joint compulsion to promote Chilume Trust.

But for the complaint by Samanwaya Trust on 20th September, none of these activities would have come to light. Chilume had made an oral agreement with Samanwaya Trust to send people with false BLO / BLC Cards to households for collection of personal information of voters through a detailed form and an App called Digital Sameeksha. They also organized "BLO Training" online and on the field as seen from two You Tube videos. The surveyors were expected to be trained on the field and while Sumangala KH confirmed the survey kit (including polling area maps, voter list and a printed questionnaire), and the existence of an App, she stated that only access to back end data entry was available for women workers.

Digital Sameeksha App

This is an APK (Android Application Kit) which is hosted on www.godaddy.com and a number of Chinese free android ware sites like <https://apkcombo.com/digital-sameeksha/com.digitalsameeksha/> and <https://www.androidfreeware.net/download-com-digitalsameeksha.html>. A domain was purchased from www.godaddy.com on 07-07-2018 viz. VIN/GODADDY IND/20180707114519/0 for Rs. 1132.00 paid through DAP Hombale. In addition numerous training videos are available on You Tube proudly proclaiming the App as replacement for ECI's Voter Helpline sanctioned to Chilume BLOs by BBMP. The App has Booth level data, Forms 6, 7, 8 and a separate online form for personal details (including Mobile Number, Adhaar Card, Voter ID, Address, Type of Accommodation, Economic Status, Caste, Sub-Caste and Mother Tongue besides sections on Political Opinion and Voting Inclination) built into it as seen from the Training Video Screenshots. The audio is even more revealing but cannot be reproduced here.

<https://apkcombo.com/digital-sameeksha/com.digitalsameeksha/>



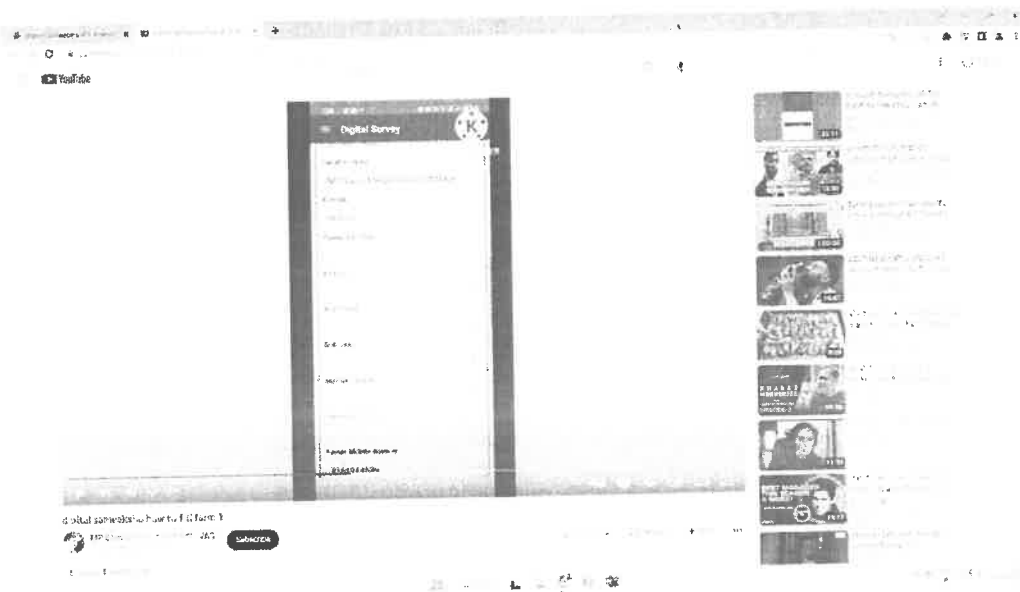
<https://www.youtube.com/watch?v=8fwNGL1H3qw>

Digital Sameeksha how to fill farm 1 (Form 1)

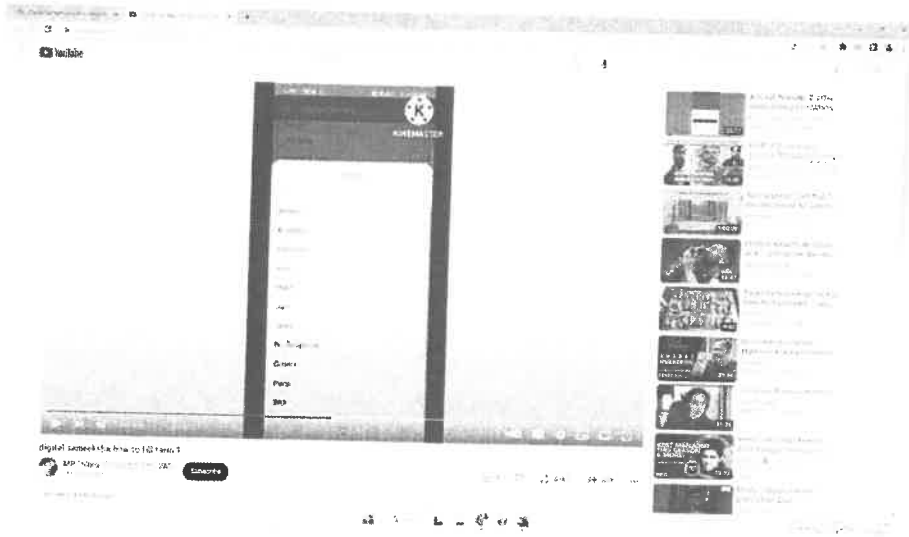
MR Chinna ಕೋಲಾರಗಂಡು VAS

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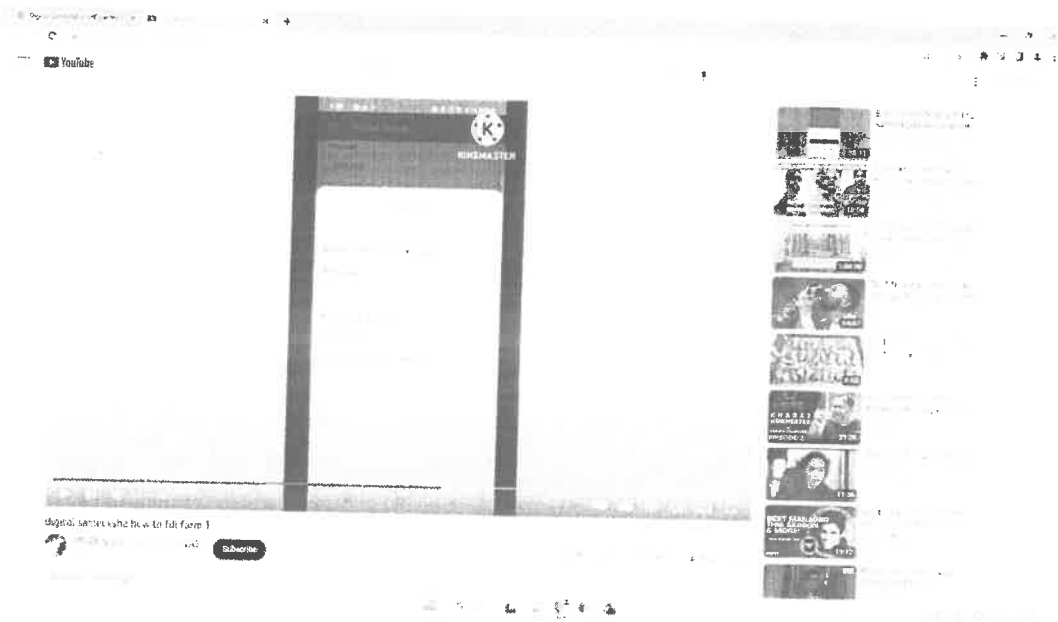
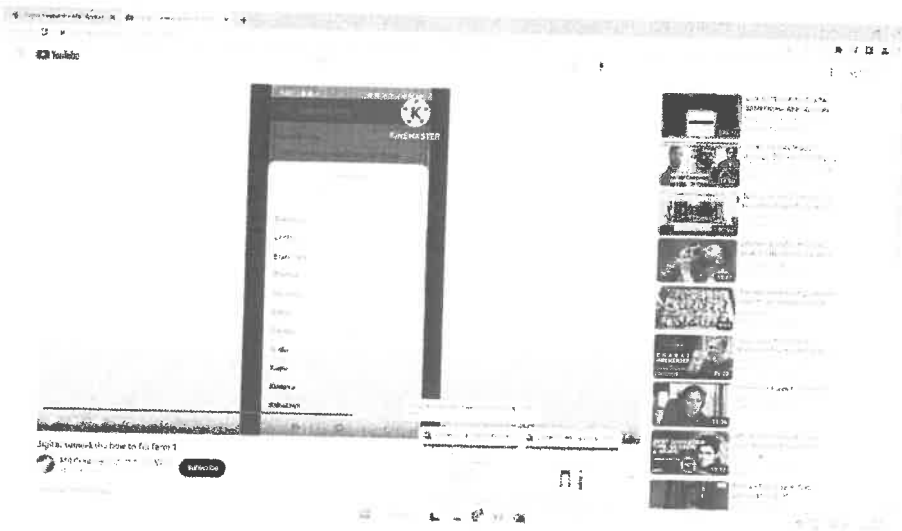
1. Personal Detail Screen



2. Religion Screen



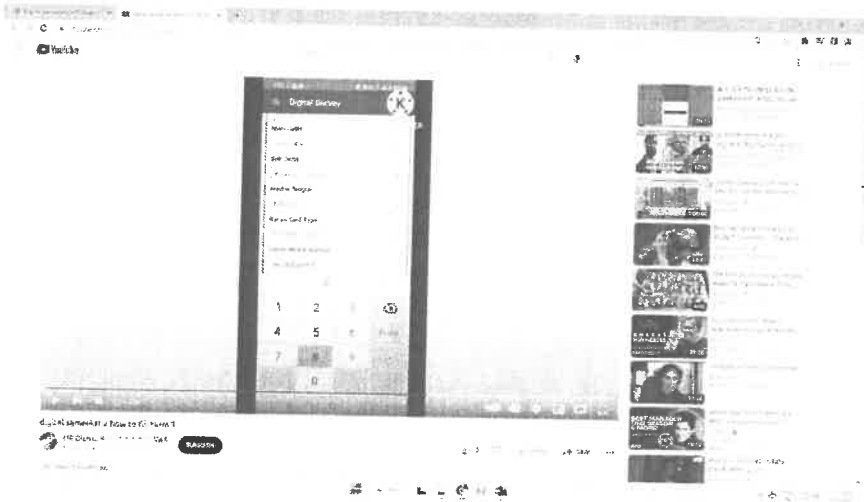
3. Caste & Sub Caste Screens



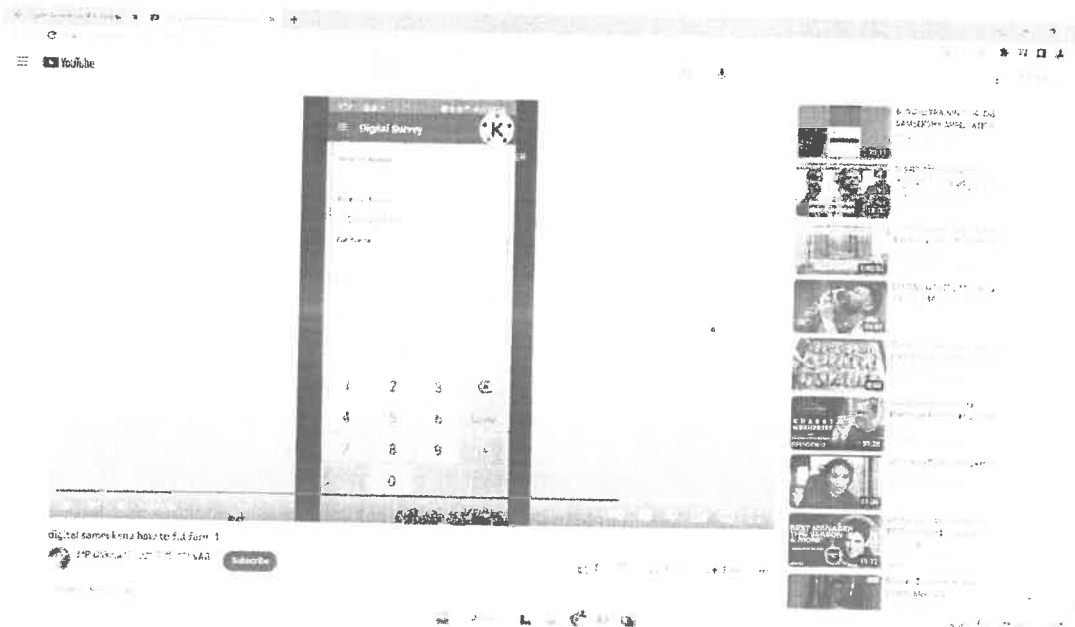
4. Mother Tongue Screen



5. Family Mobile Number



6. Voter ID & Aadhaar Screen



<https://www.youtube.com/watch?v=bWpdJZvE2MM>

79 views 5 months ago

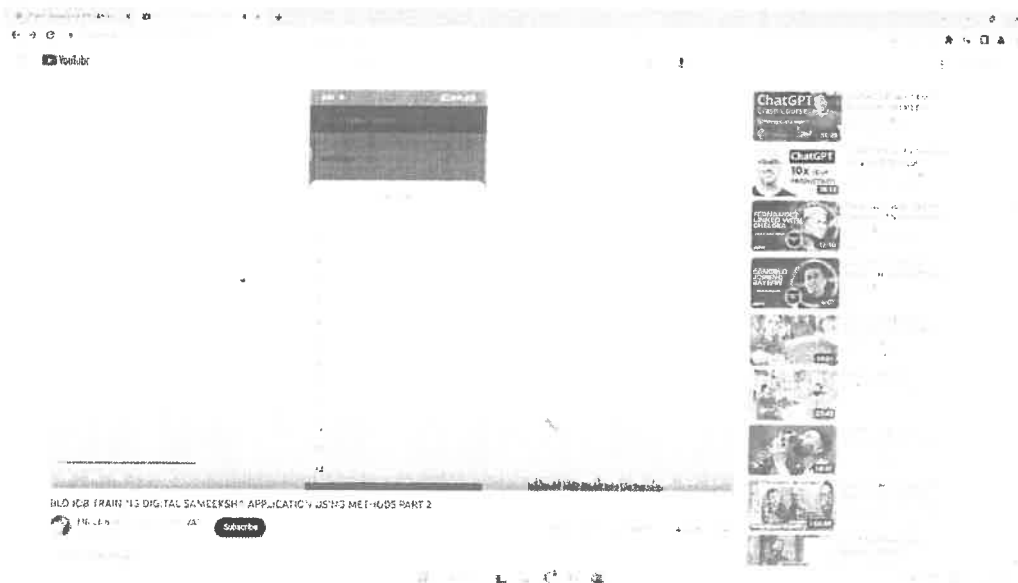
MR Chinna ಕೋಲಾರಗಂಡು VAS

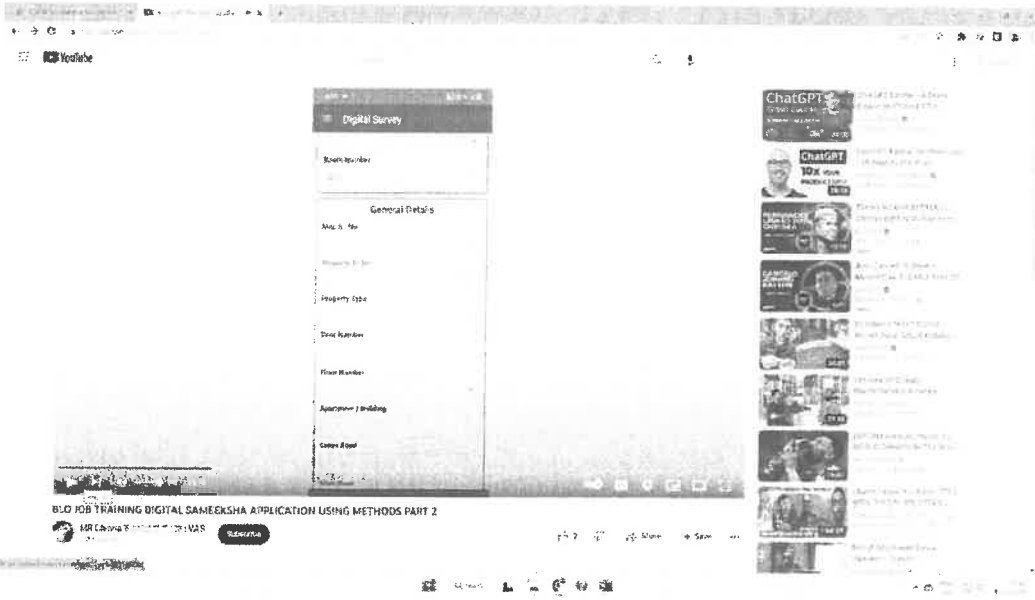
BLO JOB TRAINING DIGITAL SAMEEKSHA APPLICATION USING METHODS PART 2

1. Mahadevpura Constituency Screen



2. Mahadevpura Booth Data Screens





https://www.youtube.com/watch?v=VI_WGDEIq_Cc

OTTER ID(Voter ID) BLO job training part-1

MR Chinna ಕೋಲಾರಗಂಡು VAS: 7 views 5 months ago

Voter Helpline Replacement By Digital Sameeksha App



These activities are under the current enquiry and police investigation. The data already entered on the App (Ravi Kumar claims only 4000, while many believe it runs into lakhs as the training video of the finished version is more than 5 months old) is allegedly available on a foreign (possibly Chinese or East European Server) and requests for handover from police are pending. It is however clear from the claims of the trainer that Digital Sameeksha was proposed be used instead of Voter Helpline of ECI and that it was allegedly sanctioned by BBMP. The pop-up data in the App could not have been fed into it except from BBMP sources. While this also underlines that the ECI's Apps themselves have not been breached, it is a no brainer to conclude that shifting to private BLOs by BBMP officials has jeopardised the election data collection process as the efficacy of any App is limited to its users. It is thus necessary to have a thorough Cyber Crime enquiry into this App.

It is informally reported that along with the forms and the Web App being used by Chilume, filled up Forms 6, 7 & 8 have also been found in their offices. It thus appears that Chilume Trust was planning something much more pervasive than mere data collection and SVEEP. The complainant has stated that Chilume Trust were aiming to sell data to political parties for commercial gain.

Issues:

- a. The applicability of SVEEP guidelines should be the same for all events.
- b. Guidelines for partnerships with CSOs/ NGOs for SVEEP should be strictly adhered to.
- c. The guidelines issued by the ECI need to be rigorously enforced with respect to using NGOs in SVEEP particularly emphasizing the selection of NGOs, the exact activities to engage them in and the modalities of such engagement.
- d. In the guise of free service certain NGOs, as in the case of Chilume Trust may just be getting a foothold into election activities and extend their influence from SVEEP to more sensitive and core activities. Hence NGOs/ Trusts which partner with Government on commercial terms (as is the case with Chilume Trust) should best be left out of consideration.
- e. Inter-personal contact with voters and collection of voters' personal data may lead to various legal complications regarding misuse of personal data particularly if enabled by an innocuous or broad spectrum permission from an election authority. Hence endorsed face to face contact with voters should be restricted to election officials only.
- f. There are possibilities of certain officials misusing such permissions down the line to stretch their applicability which could put the free and fair process of elections at risk. Hence a protocol of who may give such permissions should be put in place.

Prescribed Guidelines & Strategy of SVEEP

As detailed in various SVEEP Compendia, "Systematic Voters' Education and Electoral Participation (SVEEP) is a multi-intervention programme that reaches out through different modes and media to educate citizens, electors and voters about the electoral process in order to increase their awareness and participation. SVEEP is designed according to the socio-economic, cultural and demographic profile of the state as well as history of electoral participation in previous rounds of elections and learning thereof".

Programme Objectives:

- (a) **increasing** voter registration and turnout
- (b) **increasing** ethical and informed voting
- (c) **continuous** electoral education

Strategy and Framework

- a. Strategies to overcome hurdles to voter registration (mental / attitudinal or information asymmetry or accessibility to voter registration process).
- b. Spreading awareness about informed, and inducement free voting
- c. Information, Motivation and Facilitation

Targeted Interventions: Based on historical polling data customized interventions are designed, with focus on the following:

- I. Closing gender gap

- II. Countering urban apathy
- III. Overcoming youth “disconnect”;
- IV. Targeting Service Voters
- V. Outreach to Overseas Indian Electors
- VI. Special outreach for Persons with Disabilities
- VII. Inclusion of domestic migrants and other marginalized segments

Framework

A) Preparation

- a) Formation of SVEEP Core Committees at State and District Level
- b) Appointment of Nodal Officers at State and District level
- c) Training and capacity building of officers
- d) Situation Analysis through surveys to identify gaps and groups recording low participation
- e) Identifying lowest turnout PS and reasons
- f) Analysing gaps and reasons for the gaps

B) Planning

- a) Preparation and sharing of National Framework of Action Plan
- b) Preparation of State SVEEP plans based on state level gaps and National Framework
- c) Preparation of District SVEEP plans based on district and PS level gaps
- d) Drawing up monitoring, feedback and evaluation process and mechanism
- e) Resource allocation
- f) Content creation for creatives
- g) Calendar of activities

C) Partnerships & Collaborations

- a) With Educational Institutions, Govt. Departments, Youth Organizations like NSS, NCC, NYKS
- b) With Media Houses
- c) With Civil Society Organizations / NGOs
- d) With Corporates and PSUs
- e) With renowned individuals: appointment of National & State Icons

D) Implementation

- (a) Targeted Interventions

(e) Monitoring & Evaluation

In 2016, KAP (Knowledge, Attitude and Practices) Surveys were introduced based on recommendation by TISS (Tata Institute of Social Sciences). States/UTs are mandated to carry out KAP baseline survey ahead of election and endline survey after the election with the specified objectives:

1. Reasons for gaps in electoral participation, both at enrolment stage and voting;
2. Identify the barriers to voting;
3. To identify the demographics of elector segments with lower enrolment, and participation
4. To understand effectiveness of various formal & non-formal media vehicles;
5. To suggest measures to ensure higher enrolment and higher voter turnout based on the outcome of the Survey.

Timeline: KAP Surveys shall be carried out well in advance, the findings of Baseline survey should be available around 6 months ahead of the completion of the term of the State Assembly/Lok Sabha. The Endline survey should be carried out within 2 months of the completion of the polls.

Questionnaire: A standard questionnaire for Baseline and Endline survey has been evolved to track the findings of the survey across states. CEOs have the option of adding question after those given in the standard questionnaire. The raw data in SPSS/STATA format (along with codebook) shall be required to be submitted to ECI along with the survey report.

Survey Agency: Qualified Agencies or Educational Institutions with survey experience may be engaged to conduct the Survey. CEOs should scrutinize the operational procedures followed by the survey organizations and closely monitor whether quality norms are being followed during recruitment and training of enumerators, field work and data entry.

SVEEP Action Plans for Elections: Based on the findings of the KAP survey and situation analysis, the States are expected to prepare the State Action Plans specifying the objectives and detailing out the implementation plan, based on the IMF strategy (Information, Motivation and Facilitation) along with the calendar of activities.

Partnership

The network of partnership should be developed at State level and also at District level for strengthening the SVEEP programme. In this connection, the framework of partnerships already issued by the Commission in relation to CSOs, PSU/ Corporates and Media and also the scheme of Campus Ambassador's may be optimally harnessed.

ELECTIONS: In the run up to Elections the following SVEEP measures are prescribed:

1. **Outreach Activities:** The activities shall be planned based on the situation analysis
 - a. Forms 6, 7, 8 and 8 A be made available at all prominent places
 - b. Special registration camps in weekly hats, during festivals and through mobile vans may be conducted.
 - c. Corporates need to be contacted so as to ensure registration of their employees.
 - d. Mass mobilization activities may be taken up close to elections

- e. Communication Campaigns shall be carried out through mass media, folk media and other media vehicles besides direct people-to-people contact.
- f. EVM familiarisation activity combining with NOTA and VVPAT familiarisation, where necessary.
- h. Copies of Electoral Rolls may be to be provided to SLMA workers at Gram Panchayat besides partner CSOs and political parties.

2. Outreach Material Development

- a. In material development, CEO and her/his team will first consider the archive of approved material compiled by the SVEEP Division of the Commission.
- b. CEO would take necessary steps for further Inventory Building on Voters' Information and Awareness software for the state: outreach material developed for Special Revision, National Voter's Day shall be extensively used, after suitable modification.
- c. Survey findings may be utilized for designing the campaigning material and deciding the media vehicles for dissemination.
- d. Regional and/or local icons may be identified by each State/ UT and promotional material for voting may be prepared availing their services, after getting approval of Commission on the content (messages), in addition to the National Icons of ECI, viz. Late Dr. A. P. J. Abdul Kalam, former president of India, Sh. M. S. Dhoni, Cricketer, Ms. Saina Nehwal, Ms. Mary Kom, Olympic Medallists and Shri Aamir Khan, Actor and the regional icons already approved by Commission.
- e. Material on voter awareness may be given to partner CSOs/ media houses for wider dissemination.
- f. Under ECI-NLMA MoU, Sakshar Bharat workers (NLMA) shall carry out electoral literacy programmes besides helping BLOs for enrolment during continuous updation.
- g. All messages used in the elections shall require approval of the Commission, if these are not earlier vetted.

3. Voters' Facilitation:

- a. Voter Registration and Education centres to be set up at strategic locations.
- b. Registration of left-out Voters to continue till the last date of filing of nominations of candidates.
- c. Basic Minimum Facilities at Polling Stations

4. Monitoring & Review

- a. Mid period review and constant monitoring of SVEEP programme
- b. Regular Video Conferences to be organised by CEO with all DEOs for review of implementation.

5. Evaluation & Documentation: The DEOs shall evaluate the interventions carried out in their district and submit a report to the CEO within a month of closing of polls.

6. Informed and Ethical Voting: States and Districts shall identify expenditure sensitive constituencies and polling stations where focused campaign needs to be taken out on ethical

voting. At booth level, in expenditure sensitive regions, the BAGs shall be the dissemination hub for messages on ethical voting.

7. NOTA: Communication material/creatives displaying EVM or EVM message shall mandatorily have information about NOTA. EVM familiarization Camps shall display NOTA button.

8. Model Polling Stations (MPS): Model Polling Stations attempted to provide additional comforts like queue less voting, waiting halls, crèche, first aid kits etc.

9. Improved Queue management

10. Behaviour of the polling staff/ volunteers

ROLL REVISION: With respect to Roll Revision, the following SVEEP measures are prescribed

A. Overall Objectives:

- a. EP ratio on the electoral rolls to match the 18+ population as per census
- b. Gender ratio on rolls to match the gender ratio as per census
- c. To increase enrolment of Service Personnel in the electoral roll
- d. To increase enrolment of NRI in the electoral roll
- e. Registration of Persons with Disabilities (PwDs) in the Electoral Roll to match with the census data of 18+ PwDs of each state
- f. To increase the percentage of enrolment in the newly eligible 18-19yr age group from existing 50% to nearer 80%
- g. Visible improvement in the enrolment of domestic migrants, people from marginalised groups and communities (Inclusion)

B. Strategy and Implementation

- i. Identify Gaps at Micro-level and Targeted intervention
- ii. Youth enrolment (including newly eligible)
 - a. Strengthening Campus Ambassadors system,
 - b. Higher involvement of Nodal officers from Campuses in enrolment drive
 - c. Special drive for enrolment of non-student youth in this age-group
 - d. Coordinate with NSS and NYKS for reaching out to youth widely
 - e. Make 'Youth Voter Festival' a part of the Calendar ahead of summary revision, in August/September
- iii. Gender Gap
 - a. Co-opting media and Field formations to enrol women
 - b. Targeting young girls in educational institutions for enrolment with help of Campus Ambassadors
 - c. Targeting housewives and women engaged in labour in cities in industrial establishments
 - d. Using SHGs and Cooperatives of women to spread awareness
- iv. Persons with Disabilities
 - a. Prepare database of PwDs

- b. Identify Community Radio networks or magazines, channels, etc for PwDs to partner. Use programmes on AIR, DD and private radio and Cable TV to reach out to PwDs
 - c. Identify **credible** CSOs working for PwDs
 - d. Special camp and campaign may be taken up to register
 - e. CEO and DEO Website have to be disabled friendly; adhere to Level AA of the Web Content Accessibility Guidelines
- v. Migrant Population in Metros
 - a. Co-opting Corporate House to reach out professionals
 - b. Using Labour Offices of district administration to reach out to migrant labour;
 - c. using CSO network to cover homeless, scavengers and other migrant population
 - d. Helping Federations like FICCI, ASSOCHAM, CII, NASSCOM etc for enrolling employees
 - e. Possible BLVs – volunteers (metros are hub of HQs of CSOs, Corporate Houses, Colleges etc, can get volunteers)
 - f. **Collaboration of CSOs, Corporate and Media Houses may be availed for enrolment drive within the framework already issued by the Commission.**
- vi. Inclusion
 - a. Identify marginal groups and segments and their details within the Constituency
 - b. Design educational material for identified segments or groups like Migrant labourers, Sex workers, Third Gender, Homeless, Nomads etc
 - c. **Identify credible CSOs and partners to reach out to the identified groups and segments**
 - d. **Outreach with help of partners with special registration camps**
 - e. Design special awareness material for Tribal Communities
- vii. Service Electors
 - a. Special awareness and registration camps for Defence personnel
 - b. Training Nodal Officers from defence as Resource Persons
 - c. Special campaign on AWWA Day (24th August) for wives of service personnel
 - d. Tie up with local AIR and DD on their special broadcasts for Defence personnel
- viii. NRIs
 - a. Target families having NRIs and promote registration
 - b. Popularise NVSP link for online registration of NRIs
 - c. BLOs to share form 6A with families having a member who is NRI
- ix. Multi-Media Campaign: Error free roll, surrender of multiple entries and NVSP portal shall be widely publicized.

C. Developing Partnerships:

To carry forward the SVEEP programme in relation to registration, partnerships are to be forged and strengthened with the following:

- a. State Government Departments
- b. MCDs in Metros
- c. Public Broadcaster, AIR and DD

- d. Local Railways
- e. Airport Authority of India
- f. Educational Institutions
- g. BSNL /MTNL
- h. Transport Department
- i. PSUs like Indian Oil, Bharat Petroleum, Banks
- j. Private Service providers like Airtel, Vodaphone etc
- k. Theatres like PVR, Inox etc and Shopping Malls
- l. Private Media – TV Channels, FM Channels, Newspapers
- m. Corporate Federations
- n. Individuals like Corporate personalities, Actors, Artists etc

D. Booth Awareness Groups (BAGs):

BAGs shall supervise and coordinate SVEEP implementation at the booth level and shall be set up at every booth with BLOs as the Member Secretary, and Booth level government functionaries, para workers, representatives of Local body, BLAs, BLVs, Head or representative of Schools/Colleges in the Booth area, NSS/ NYK volunteers and member representatives of local CSO/NGO as members. It shall be ensured that members other than BLAs are not aligned to any political party.

Constitution and Support: District Election Officers shall give a compliance report to the CEO on formation of BAGs at all Booths.

- a. DEO shall draw the district plan for SVEEP campaign, associating the BAGs for the booth level component of the plan.
- b. DEO shall provide training to all members of BAGs
- c. BAG members shall be trained to use the NVSP portal for online registration and all other services provided therein.
- d. **DEO shall equip the BAGs** with the latest communication material (i.e., brochures, posters, audio spots etc) in adequate quantity for distribution at the booth level.
- e. The DEO shall periodically check that BAGs are functional
- f. BLOs shall maintain a list of all the members BAGs with contact numbers

CONTINUOUS ELECTORAL LITERACY

Campus Ambassadors: CEOs shall appoint Campus Ambassadors from among neutral, non-political students in recognised Colleges and Universities to bridge the gap in youth electoral participation.

Electoral Literacy Material: The material developed in collaboration with NLMA in form of Flash Cards, street play script, slogans and radio play shall be translated and used for electoral awareness

COLLABORATIONS AND PARTNERSHIPS

1. Collaboration with Ministries and Departments: At State level, CEOs shall collaborate with State Government Departments. Department of Education shall be taken as an active partner in the SVEEP programmes at District and State level. Collaboration with youth organizations like **NYKS, NSS, NCC**.
2. Collaboration with NLMA: The NLMA-ECI electoral literacy material shall be extensively used by the election officials during the elections. The NLMA workers shall partner the District election officials in various outreach activities under the SVEEP programme.
3. Collaboration with Private Media: ECI has chalked out the Framework of Engagement with Media Organisation. CEOs and DEOs shall collaborate with private Media Houses within the parameters specified in the Framework
4. Collaboration with CSOs: ECI has developed a Framework of Engagement with CSOs. Within this Framework, CEO shall collaborate with CSOs for non-partisan, objective, non-political citizen awareness, facilitation and engagement. The **collaboration will be without any funding arrangement** and shall become operational between CEO and any CSO through exchange of letters.
5. Collaboration with PSUs/Corporates: Public Sector Enterprises and Corporate Houses can play a significant catalytic role in enhancing citizen engagement by extending support to the SVEEP programme and also fulfil their Corporate Social Responsibility.
6. Icons/Ambassadors: ECI has associated with renowned Indians from various field enjoying national appeal and appointed them as ECI's National Icons to motivate Voters. Similarly renowned individuals in states can be appointed as State Icons.

ECI Guidelines for Engagement with a Civil Society Organisation

Framework of Engagement

B. Criteria for CSOs

- a) Non-political and non-partisan with clean antecedents (financial and criminal)
- b) High Credibility and reputation among people within their regions of operation and should have good network in the region
- c) Actively engaged in any developmental or social cause
- d) A background of knowledge of one or more areas of:
 - (i) Democracy and Awareness
 - (ii) Election Management
 - (iii) Electoral Participation
 - (iv) Education
 - (v) Inclusion, worked with marginalized segments/ group in the society

C. Role and responsibility of ECI/Chief Electoral Officers of States

- I. Recognizing the CSO as a partner organization in promotion of electoral democracy:

- II. Creating a mechanism for coordination and periodic evaluation of the collaboration
- III. Imparting training and capacity building of CSOs through Workshops
- IV. Involving CSO **volunteers** to assist the Booth Level Officer for each polling station area as a **Booth Level Volunteer** in the area of Electoral Roll correction and revision.
- V. While working out information and motivational campaigns for facilitating voter participation, they may involve the CSO **appropriately**.
- VI. CEOs shall share the material on Voter education /awareness with the CSO for wider dissemination.

D. Roles and responsibilities of CSO

- i. Assisting the Chief Electoral Officer in taking up voter awareness programs
- ii. Assisting both rural and urban population to register as voters at convenient registration locations
- iii. **Nominating volunteers (BLVs)** with clean antecedents for each polling station
- iv. **Assisting the Electoral Registration Officers (EROs) and the Booth Level Officer in obtaining applications, photographs** from the eligible and new voters
- v. Help overcome information and motivational gaps
- vi. Promote ethical and informed voting free of inducements

E. Safeguards

Since non-partisan, objective, non-political citizen awareness, facilitation and engagement are the basis of this framework of engagement, any deviation will automatically mean that the working arrangement with CSO has lost its relevance and stands dis-engaged forthwith. If any other organization/agency, is sought to be associated with this collaboration work by the CSO, that can happen only in consultation with the Election Commission.

Verification of Purity of Electoral Roll & ERO.Net, Garuda App

As directed by the ECI, a comprehensive verification of the purity of the electoral rolls was taken up in Mahadevpura, Shivajinagar & Chikpet. No electoral fraud or manipulation of electoral roll is detected in the three constituencies of 162 Shivajinagar, 169 Chikpet and 174 Mahadevpura.

Analysis: In Chikpet, out of 16306 deletions, after complete door to door check using authorised BLOs, the Roll Observer has found only 3.64% improper deletions which have since been corrected and 0% improper additions out of 4343 additions. In Shivaji Nagara the Roll Observer has reported that there are only 0.98 % incorrect additions out of 5219 cases and 3.3% incorrect deletions out of 14727 deletions. Appropriate corrective measures have been taken. With respect to 174 Mahadevpura, the Roll Observer has reported 0.43% incorrect additions out of 25535 additions and 3% incorrect deletions out of 32529 deletions.

Subsequently, due to additional complaints received about RR Nagar and due to seizure of filled in Form 6, 7 & 8 as well as BLO Cards of 2017-18 and 2022 pertaining to some other

constituencies, it was felt, in the context of ECI's directions to maintain 100% purity of electoral roll in all 28 constituencies to carry out a 100% table top check to identify doubtful deletions if any and verify these through field check.

Accordingly, a Table Top check of PSE deletions in other 25 constituencies including 154 Rajarajeshwarinagar by Senior KAS nodal officers from various departments was taken up, followed by door to door verification of doubtful cases. The exercise, completed by 5th January have yielded an average of 1.2% incorrect deletions with maximum being in 150-Yelahanka (3%), 153-Yeshwanthapura (2.5%), 175-Bommanahalli (2.7%) and least being 163-Shantinagar (0.2%) and 154-Rajarajeshwarinagar (0.3%). Further, the system of checks to ensure 100% purity of the electoral roll, adopted under the directions of the ECI indicate that the PSE software has very high detection efficacy and yields correct results provided there is no human error during DSE cross-verification. The bulk of the errors which overall for all 28 constituencies of BBMP area amounts to about 1.6% are mainly random human error caused by inattentive reading of DSE data. These are being corrected.

Observations by Roll Observers

- i. Very few PSE deletions were found to be done without field verification.
- ii. Culling out fully deleted PSE clusters from the data shared by CEO office was helpful to identify the wrong deletions.
- iii. As a result, persons in such cases have been deleted despite available in the addresses given in the electoral roll. In one specific case one of a pair of twins who looked exactly alike was deleted in part no 185 of 162 Shivajinagar.
- iv. Another issue found in deletions is that the BLOs have recommended correctly but while deciding the forms reverse deletions have happened. Hence a few persons have been deleted in the part where they had to be retained.
- v. There are a few cases in which both duplicate entries have been deleted.

Verification of Seized Forms

Copies of the forms seized from Chilume have been have been collected with the cooperation of DCP Bangalore Central and verified 100% through BLOs and of the already approved forms, none are found to be incorrect. For correct unapproved forms, appropriate action is initiated. The actual data is given in the data below:

Total No. of Forms received			Total Forms Enrolled	Total Forms Not Enrolled	Total Enrolled found Genuine	Total Forms Un-enrolled found Genuine	Remarks
Filled	Unfilled	Total					
1	2	3	4	5	6	8	10
785	125	910	81	704	81	704	Form-6 submitted by applicants for new PVC EPIC card due to misplacement of EPIC card.

Table 2: Verification of Seized FORM-7 RR Nagar								
Total No. of Forms received			Total found deleted	Total found Not deleted	Total genuine deletions	Total Forms found not genuine for deletion	Balance Forms (Col. 5-9)	Remarks
Filled	Unfilled	Total						
1	2	3	4	5	6	9	10	11
560	29	589	39	521	39	349	172	Total No. of Forms mentioned Col. No.10 are not traceable due to incomplete information in the application

Table 3: Verification of Seized FORM-8 RR Nagar						
Total No. of Forms received			Total processed for correction	Total Not processed	Total Processed Forms found Genuine	Total Un-Processed Forms found genuine for correction
Filled	Unfilled	Total				
1	2	3	4	5	6	8
114	8	122	2	112	2	112

From the above analysis and verification of electoral rolls and ERO.net data it is clear that there is no evidence of tampering with the electoral roll as the ECI's software and system of checks and monitoring are highly resilient and fool proof. The errors noticed are due to human negligence. However, to ensure complete purity so that no voter is left behind, a SOP is proposed to further vet the process of online registration on ERO.net.

An SOP has been prepared in consultation with the Roll Observers of Shivajinagar & Mahadevpura:

SOP for Ensuring 100% Purity of Electoral Rolls (ERPC)

1. Preparatory Arrangements:

- a. All constituencies shall have current and updated list of BLOs, RIs, TIs, AEROs, EROs & DEOs (Election & BBMP) with Name, Designation, Contact, Signature, Polling

Station, Photo (Preferably) duly attested by ADEO/ ADC as the case may be. List may be uploaded on CEO & DEO website for public information

- b. I - Card shall be issued to all BLOs & DtEOs (Data Entry Operator) with their signature, photo, contact number and year of operation.
- c. All processed forms shall compulsorily be in custody of concerned AERO and AERO shall list them by time from latest to earliest and enter in a data list (in excel) of each form type with following columns to the ERPC officer for table top verification and comparison with ERO.Net data:

Form							
Applicant	Date of Submission	Online / Offline (O/E)	Reason for Application	Date of Approval	Applicant Signature (Y/N)	BLO Signature (Y/N)	Remarks of AERO about SOP

- d. DtEO concerned shall copy all data of deletions, additions etc into formats issued for tabletop verification
2. ERPC (A) for 3 focus constituencies (where there are abnormally high or low deletions and / or additions over 20% higher or lower than mean) shall be dealt with by at least 1 KAS / other officer per Ward under the guidance of the Poll Observer
3. ERPC (B) for other constituencies shall be dealt with by senior KAS / IAS officers from BBMP & RC Office. Special focus shall be given for ERPC in constituencies with complaints. DEO shall monitor this.
4. Each ERPC officer shall operate from concerned ERO office
5. ERPC (A) for 3 focus constituencies (Chikkpete, Mahadevpura & Shivajinagar)
 - a. Each BLO shall report for duty to AERO daily and collect the H2H survey list and 100% verification of processed forms copy and pending forms. Each BLO shall devote 50% of his / her time for H2Hof at least 30 to 50 Households in a day and balance time for allotted numbers of ERPC verifications. Each BLO shall report back with the work done in terms of (a) H2H survey (b) H2H Verification of processed form copies and pending forms duly filled in, signed by Applicant & BLO.
 - b. AERO shall have the data entered in and analyse the same and make required entries in ERO.Net on the same day. With respect to H2H survey, necessary fresh forms shall be issued to the BLO the next day. With respect to H2H Verification, the correction if any required shall be submitted to ERO along with the entered data, and ERO shall submit report to the ERPC officer. The Roll Observer shall consider the progress reports every 3 days and make necessary suggestions.
 - c. DtEOs shall enter all data by copy pasting from ERO.Net into an excel sheet and then copying the data into the relevant columns of the Table Top SOP check. The entries shall be cross verified by the ERPC officer randomly up to 30 % from ERO.Net and Checklist.
 - d. For table top verification separate formats are to be issued for addition, deletion by death and PSE deletions
 - e. In case of additions following parameters are checked to find out SoP violations
 - Whether Form 6 is present or not
 - Whether date of birth proof is attached

- Whether address proof is attached
 - f. In case of deletions due to death following parameters are checked to find out SoP violations
 - Whether deletion is done suo moto
 - Whether Form 7 plus BLO report is available
 - g. In case of deletions by PSE following parameters are checked to find out SoP violations
 - Whether PSE checklist is generated
 - Whether prefilled Form 7 is given for BLO's field verification
 - Whether applicant's signature on Form 7 /Form 8/checklist is available.
 - h. In case of deletions due to shifting, following parameters are checked to find out SoP violations
 - Whether suo moto deletion is done
 - Whether notice is served via speed post with AD
 - Whether BLO visit within 15 days of notice happened
 - i. Further nodal officers were provided with ward wise clusters of PSE records. Each cluster consisted of records having similar photos as identified by ERONET software. Prima facie it was observed that some wrongful deletions happened in those clusters where all the records were deleted. Also, those clusters were identified where despite having different names and addresses.
 - j. After the BLOs completed the 100% field verification work, the records identified above are cross verified with the field verification report of BLOs to confirm wrongful deletions and to ascertain whether corrective action has been taken.
 - k. Based on this data, where more than 1 SOP is found violated shall be cross checked by RI & BLO with the second copy of the Form / Checklist and both shall sign on these.
 - l. The ERPC officer shall perform 20% random field verification of these cases. Poll Observer shall perform 10% random field verification. This graded exercise shall ensure 100% ERPC.
6. ERPC (B) for 25 constituencies with complaint based focus constituencies: Preparatory arrangements as in para 7 shall be mandatory.
- a. Within ERPC (B) the complaint based focus constituencies are RR Nagar, Yeshwantpura and Byatranpura. These shall follow the ERPC (A) model in Para 8.
 - b. Rest of the constituencies shall have initial Table Top Check. In view of deletions being barred at ERO level on election year, the focus of field check shall be identifications of improper deletions through PSE, Death and Shifted Voter.
 - c. AERO shall identify Clusters as displayed in ERO.Net of PSE deletions of the same person and carry out from the check list or generated forms, a DSE of the cluster. From this, doubtful deletion shall be identified e.g.
 - i. PSE cases where all entries are deleted
 - ii. PSE + Shifted (Within Constituency) cases where all entries are deleted
 - iii. Signature of BLO / Applicant not available
 - iv. Form not available

- d. In case of deletions for shifting, clusters of Shifted “With Family Linkage” and “Without Family Linkage” shall be examined. The latter are more likely to be doubtful deletions and shifting hence should be thoroughly checked.
 - e. Based on the analysis of Clusters from checklist and online data, where ERPC officer suspects any impropriety, he shall direct concerned BLO to visit the spot and submit report. In case doubt persists after field check, ERPC officer may personally field check the same and sign the report with BLO & RI.
 - f. Corrective action shall be taken only after field check of Table Top verifications.
7. For additional cross verifications, particularly persons shifted outside the constituency, the ECI website may be used for EPIC check across Karnataka
 8. Where DSEs are indicated and manually overridden, Field check should be done or the voter should be called by ERO / AERO / BLO to verify correctness
 9. Where EPIC series of other states are found, field check should be done (Note: A list of EPIC series of other states may be made available to all EROs)
 10. Where manual forms are submitted (starting with E and not O) and SOP are violated, RI / TI should do field check along with BLO.
 11. Table top check should ensure comparison of (a) Form Submission Date, ERO’s Approval / Rejection Date and BLO Report Date to ensure no statutory time limit is violated.
 12. All cases where checklist / form is not signed by BLO & Applicant must be field checked
 13. Every ERO shall get confirmed and signed statement from each AERO that the BLOs therein are appointed as per ECI guidelines & BLOs shall be warned that if there is any kind of impersonation, strict action will be taken.
 14. Additional Checks after 5th Jan to ensure purity:
 - a. The COVID death data of the constituency shall be collected from BBMP War Room and cross checked against the voter list in 7 days. Undeleted names shall be listed for collection of Death Certificate from the concerned family.
 - b. The cases of Shifted (Outside Constituency) shall be tabulated and intimation given to the destination constituency (if available in the form) ERO.
 15. All ERPC officers shall submit a comprehensive report on the above actions with suggestions and problems encountered, to the concerned Roll Observers.

Conclusion & Detailed Recommendations

Suggestions on use of NGOs in SVEEP

In this context it is perhaps necessary that when such partnerships with NGO/ CSOs, Corporate & Media Houses are created at least the following should be ensured:

A. Selection:

- i. The registration documents of an organization, its professed activities and aims & objectives
- ii. Cross verification with online sources such as RoC, <https://ngodarpan.gov.in/> etc
- iii. Confirmatory reports from other government departments about these activities
- iv. Past financial records and funding sources, Audited Accounts & P&L Accounts
- v. Antecedents of the Directors / Partners / Trustees may be checked and their political affiliation if any need to be cross checked with reference to other organizations they may be involved with

- vi. SVEEP programs selected must have equanimity with ECI guidelines
- vii. The partnership should be formally confirmed through a time bound stamped agreement and for a specific purpose with inter alia the following conditions:
 - a. Content approval and ownership confirmed. Unauthorised use of content, data and materials or permissions barred outside the timelines, locations and activities
 - b. Specific Activity Chart with Timelines & Locations
 - c. Reports with Audio Visual & Documentation made mandatory
 - d. Non-disclosure clause included
 - e. Political Neutrality by affidavit ensured
 - f. Coordination method and responsibilities clearly specified on both sides
 - g. Indemnification of contracting authority
 - h. Sub-contracting barred
 - i. Commercial relation with contracting department barred
 - j. House to house surveys and personal or behavioural data collection barred

B. Monitoring:

A multi-level monitoring mechanism should be forged with layered checks and balances.

- a. Depending upon the scope of the activity, a three to four layer monitoring and supervision system should be available:
 - i. SVEEP Nodal Officer – ERO – AERO for macro SVEEPs
 - ii. SVEEP Nodal Officer – ERO – AERO - BLO for micro SVEEPs
- b. A feedback system should be put in place to evaluate the nature and impact of the activities
- c. Check on any form of deviation from the activity chart
- d. Check to prevent any political propaganda or Voter data collection using any forms or electronic means
- e. Weekly progress report and final report to DEO
- f. Fortnightly report to CEO
- g. Regular report by CEO to ECI

C. Documentation:

- a. Detailed documentation of the engagement process should be maintained:
 - i. At BLO level, handover of content and communication materials, events and activities and meetings held
 - ii. At ERO level, training and approval to BLVs (if any) with data base of the persons engaged and a clear certification of their neutrality
 - iii. At DEO level, records of monitoring & orientation meetings, and agreements and deposit of all data (if any) collected by the CSO / NGO during the engagement
 - iv. At CEO level, report on activities and partnership and proceedings of review of same

Suggestions on collection of voters' personal data

- i. Voter's data collection for any electoral purpose should strictly be done by BLOs only
- ii. Storing of any election related data should strictly be done on Indian servers only and all service providers must conform to this

- iii. Capturing of election related visuals particularly through IP cameras should be secured in such a way that the camera does not ping any foreign server when going online
- iv. Collection of personal and opinion details by Chilume Trust besides violation of privacy, could leave defenceless common people open to cyber-attacks, phishing, identity theft, credit card theft, fraud and even cause micro-targeting of vulnerable groups

Criminal investigation by the police and other authorities

- a. The criminal investigation needs to be expanded to include the patently illegal appointment of BLOs and issue of BLO cards in 2016 – 2017 without authorisation to private persons engaged by a private organisation, Chilume Trust by certain EROs & AEROs of BBMP as enumerated in this report.
- b. The financial dealings of Chilume Educational, Cultural & Rural Development Trust, Chilume Groups, Chilume Enterprises Pvt Ltd / DAP Hombale Pvt Ltd, Digital Sameeksha, Sole Proprietorship , Prajna Utility Developments & Management, Kempegowda Groups & Services inter se and with certain private companies need to be examined from the point of view of laundering of money and evasion of income tax by a competent authority.

Revamp and re-structuring of election machinery of BBMP

- c. Separate posts for Elections and Revenue should be created at ERO level and adequate ministerial staff be provided for this purpose including 2 DtEOs, 1 FDA and 1 Shirishtedar.
- d. The Special Commissioner Elections must have 1 SDA, 1 FDA & 1 DtEO for each ADEO and 2 Shirishtedars, 2 Tahsildars and 1 AC.
- e. Financial powers with respect to election expenditure and tendering should be delegated to Special Commissioner Elections
- f. Each ADEO should have a component of 2 FDAs, 2 DtEOs and 1 Shirishtedar exclusively for elections

Suggestions on procurement of election related services by authorities.

A. General Conditions:

- a. All supplies and services or works should be procured by tenders only and enforced through contract.
- b. Capacity of bidder should be fixed based on financial scale of requirements, nature of registered business and geo-locational familiarity
- c. Minimum experience of 5 years should be imposed to ensure coverage of at least 1 previous election
- d. Background check for political neutrality should be done
- e. Depending on the service, minimum of constituency level packages may be created. However, scale of tender should be contingent upon the technical complexity and incidence of service
- f. Sub-contracting should be barred
- g. Agencies with adequate permanent manpower should be contracted
- h. For hire / lease where necessary, technical specifications of equipment/ supplies should be current, depreciation at minimum and preferably owned by the supplier
- i. Non-disclosure clause should be enforced
- j. Defect replacement

- k. Habitual litigants should be avoided
- l. Procurement planning is essential
 - i. Technical specifications and estimates should be finalized through queries well in advance
 - ii. Quantity should be fixed in advance based on logical criteria of deployment with margin of 25% increase (e.g., Number of Polling Stations, Number of Voters, Number of Check Posts etc.)
- B. (i) Printing: Specifications, sizes, types, contents and quantities for all Registers, Forms, ID Cards, Vehicle Permits, Food Coupons and Posters should be finalized in advance based on precedent.
(ii) Civil Works: Model Estimates based on current regional Schedule of Rates of External Barricade, Strong Room, Counting Hall Barricade, Genset, External & Internal Lighting, Frisking Tent, Check Post Tent etc should be firmed up
(iii) Materials and Supplies:
 - (A) Computers, Printers, Laptops, Copiers specification and quantities to be finalized
 - (B) PS material item specification and quantities to be finalized
 - (C) Food, Water and Snacks to be supplied, packaging, delivery points and quantities per event to be finalized
- (iv) CCTV and Web Casting: Should be tendered centrally for scale and scope economies and also due to complexity of technology. Regional packages should be created for monitoring efficiency at regional / divisional level.

Audit of Election Expenditure

- a. CEO should have an Election Audit wing deputed from SAD / CAG for concurrent and special audit of various elections.
- b. Terms and conditions of audit should be prepared
- c. Audit Report should be submitted to ECI

