EVIDENCE PACK

CAG Findings | Red Flags | Police Records | State Gaps Complete
Cross-Mapping with Writ Petition Pagination Dairy no 20329/2026

Nitish Kumar v. Union of India & Ors.

WP (Criminal) No. _____ of 2026 | Supreme Court of India | Article 32

Petitioner Nitish Kumar (in Person)	**Period** 2017 – 2026	**Compiled** April 2026

DOCUMENT PURPOSE: This 68-page report provides (i) detailed CAG and parliamentary audit findings on cybercrime enforcement failures 2017–2026; (ii) category-wise Red Flags mapped to official sources; (iii) complete cross-mapping of every writ petition ground with writ pagination references; (iv) open-source police station FIR records; (v) gaps requiring state affidavits under interim prayers. Every finding is tagged: [GOVT SOURCE] for official corroboration and [STATE MUST ANSWER] for gaps requiring court-directed disclosure.

DISCLAIMER: Compiled using CAG Reports, Parliamentary Records, NCRB, I4C/MHA, ED/CBI Official Press Releases, FTC Orders, RBI Circulars, MEA Parliamentary Replies, NCRP Data. Not a legal opinion.

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SECTION I — WRIT PETITION STRUCTURE: COMPLETE PAGINATION MAP

1. Writ Petition Structure & Page-by-Page Index

This section provides a complete index of every document in the writ petition paper book with page numbers, enabling precise citation throughout this evidence pack. All subsequent sections cite writ pages as **[Writ p. XX]**

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1	Listing Proforma (Annexure Y)	Section-wise checklist for first listing	A1–A2	Filed
2	Index of Proceedings	Master index of paper book	A4	Filed
3	Synopsis	Core summary of petition and 20-point outline	B–H	Filed
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SECTION II — CAG AUDIT FINDINGS: CYBERCRIME & DIGITAL INFRASTRUCTURE (2017–2026)

2. CAG and Parliamentary Audit Findings — Detailed Analysis

The Comptroller and Auditor General (CAG) of India and Parliamentary Standing Committees have produced a body of official findings that directly corroborate every major ground of the writ petition. These findings are **government's own admissions** of systemic failure — they cannot be disputed by respondents.

2.1 CAG Report No. 15 of 2022 — MeitY Compliance Audit

Official Reference: CAG Report No. 15 of 2022, Union Government (Finance & Communications), Compliance Audit covering FY 2019-20 and 2020-21. **[GOVT SOURCE]**
Auditee Ministries: Ministry of Electronics and Information Technology (MeitY); Ministry of Communications (DoT, DoP); PSUs under MeitY.

KEY FINDINGS FROM CAG REPORT 15/2022:

- **Budget Under-utilization:** MeitY's cybersecurity schemes showed significant expenditure shortfalls relative to approved budgets for FY 2019-20 and 2020-21. Funds earmarked for CERT-In operational expansion were not deployed within the financial year. **[GOVT SOURCE]**
- **CERT-In Capacity Gap:** CAG found that CERT-In's incident response infrastructure was inadequate relative to the documented surge in cybersecurity incidents. No sector-specific audit of mobile application SDK vulnerabilities was conducted, despite this being a documented attack vector. **[GOVT SOURCE]**
- **No Proactive Enforcement on Foreign Regulatory Findings:** CAG found no record of MeitY initiating proactive enforcement actions based on foreign regulatory findings. This directly covers the FTC Consent Order against InMobi (June 2016) and FTC Warning Letters against Silverpush (March 2016), both of which were public record but triggered zero Indian regulatory action. **[Writ p. 53–56, 60–67]** **[GOVT SOURCE]**
- **IT Act Section 43A Enforcement Absent:** No enforcement action under IT Act Section 43A (Compensation for Failure to Protect Data) was traced against any mobile application operator, adtech company, or NBFC for the audit period. **[Writ p. 53–56]**

WRIT PETITION CONNECTION: The writ petition (Para 2.7.1(d), Writ p. 15-16; Ground (d), Writ p. 24) specifically argues that MeitY's failure for 8 years to take any action in response to binding FTC findings against InMobi and warning letters against Silverpush is arbitrary and violates Article 14. CAG Report No. 15 of 2022 provides the institutional corroboration — no enforcement records exist because no enforcement was ever initiated.

2.2 CAG Report No. 16 of 2023 — Union Government Finance & Communications

Official Reference: CAG Report No. 16 of 2023, covering MeitY operations from FY 2017-18 to FY 2021-22. **[GOVT SOURCE]**

- **UIDAI Aadhaar Third-Party Access Controls:** CAG audit found gaps in third-party Authorized User Agency (AUA) access to UIDAI authentication APIs. No real-time anomaly

detection mechanism existed to flag bulk harvesting of Aadhaar authentication requests. **[Writ p. 48–52]** **[GOVT SOURCE]**

- **Digital India Programme — Data Protection Framework Absent:** CAG found that MeitY's Digital India Programme was implemented from 2017-18 to 2021-22 without an adequate data protection framework. The DPDPA 2023 was not enacted until August 2023 — six years after the Digital India Programme scaled up — leaving a five-year data protection vacuum. **[Writ p. 57–59]**
- **No SDK Audit Mechanism:** CAG found no mechanism for MeitY to audit third-party software development kits (SDKs) embedded in consumer applications. This is the direct regulatory gap that allowed InMobi and Silverpush SDKs to operate undetected in Indian consumer applications. **[Writ p. 60–67]**
- **Expenditure on Cybersecurity vs. Incidents — Growing Gap:** The audit period 2017-18 to 2021-22 showed that cybersecurity incidents grew from 53,117 (2017) to over 14 lakh (2021) — a 26-fold increase — while MeitY's cybersecurity enforcement infrastructure did not scale proportionally.

2.3 CAG/Parliamentary Findings on Aadhaar Governance (2018–2022)

Source: CAG Performance Audits on UIDAI; Parliamentary Questions to Ministry of Electronics and IT (2019–2023). **[GOVT SOURCE]**

- **Third-Party Aadhaar API Access Logging:** UIDAI did not maintain complete, auditable records of data shared with each Authorized User Agency (AUA) beyond authentication logs. This means that systematic bulk harvesting of Aadhaar biometric authentication data by shell NBFCs was not detectable through UIDAI's own systems. **[Writ p. 9, 48–52]**
- **Shell NBFC Aadhaar Access:** Parliamentary replies (Ministry of Finance and MeitY) confirm that shell entities including Cred Fintech Pvt Ltd, Acemoney India Ltd, Transerve Technologies, and HiWe Finance were registered as AUAs — Authorized User Agencies permitted to authenticate Aadhaar. They were removed only after ED prosecution, not proactively. **[Writ p. 9–10]**
- **No Data Destruction on Entity Prosecution:** Parliamentary records show that when shell NBFC entities were prosecuted under PMLA, no court directed the destruction of Aadhaar and KYC data already collected. The data remains on Chinese-controlled servers. **[Writ p. 15, 82–85]**

2.4 Parliamentary Standing Committee on Home Affairs — 237th Report (2023)

Official Reference: 237th Report of the Parliamentary Standing Committee on Home Affairs, Lok Sabha, 2023. Cited in Writ as Annexure P-9, pages 79–81. **[Writ p. 79–81]** **[GOVT SOURCE]**

CAG-EQUIVALENT FINDING: The Standing Committee's 237th Report is Parliament's own oversight finding — equivalent in authority to a CAG audit for investigative purposes. The respondents (MHA) cannot dispute findings of Parliament's own oversight body.

- **I4C Budget Underspent — 34% Over 3 Consecutive Years:** The Indian Cyber Crime Coordination Centre, MHA's apex body for cybercrime coordination, underspent approximately 34% of its allocated budget over three consecutive financial years. This means hundreds of crores of rupees earmarked to combat the exact crimes causing Rs. 2,140 crore in annual losses were not deployed. **[Writ p. 79–81]** **[GOVT SOURCE]**
- **State Police Coordination Gaps:** The Committee documented significant capability gaps in State-level cyber crime cells. Most States lacked trained personnel for cryptocurrency

tracing, network forensics, and MLAT (Mutual Legal Assistance Treaty) requests — meaning even if data recovery actions were ordered, the investigating agencies lack capacity to execute them. **[Writ p. 79–81]** **[GOVT SOURCE]**

- **Multi-Jurisdictional FIR Problem:** The Committee documented the structural problem where a crime committed by a person in Jharkhand, using a SIM from Karnataka, against a victim in Tamil Nadu generates four competing jurisdictions with no rapid inter-State coordination mechanism. **[Writ p. 79–81]** **[GOVT SOURCE]**
- **No Digital Pipeline Forensics Capability:** The Standing Committee report found no dedicated forensic infrastructure for investigating data pipelines — meaning the three-layer data harvesting architecture described in the writ petition (Android permissions, NBFC KYC funnel, AdTech SDK) has never been forensically investigated as a connected chain. **[Writ p. 1–39, 79–81]**

2.5 CERT-In / MeitY Parliamentary Reply Data — Official Incident Trajectory (2017–2024)

Sources: Parliamentary replies to Rajya Sabha questions (2023 Budget Session); CERT-In Annual Reports; PIB October 2025. **[GOVT SOURCE]**

Year	CERT-In Incidents (Total)	Govt-Sector Incidents	Ransomware Cases	MeitY Enforcement Actions on AdTech
2017	53,117	Not disaggregated	23	ZERO — InMobi FTC order public since June 2016, no action
2018	2,08,456	70,798	35	ZERO — 2nd year of inaction on FTC findings
2019	3,94,499	85,797	26	ZERO — 3rd year of inaction on FTC findings
2020	11,58,208	54,314	23	ZERO — InMobi/Silverpush: 4th year of inaction; 59 Chinese apps banned (Sect. 69A) but SDK components in non-banned apps unaddressed
2021	14,02,809	48,285 (to Oct)	111	ZERO — Jeffrey Zhu departs India; 80M+ KYC

Year	CERT-In Incidents (Total)	Govt-Sector Incidents	Ransomware Cases	MeitY Enforcement Actions on AdTech
				records appear on dark web; zero SDK investigation
2022	19,13,500+	1,92,439	198	ZERO — 6th year of inaction on InMobi; RBI Digital Lending Guidelines issued (prospective only)
2023	Est. 25+ lakh	Increasing	Significant	ZERO — DPDPA 2023 enacted but DPB not constituted; no InMobi/Silverpush enforcement
2024	22,68,000 (NCRP)	I4C tracking	AI-enhanced	ZERO — Operation Hawk (money only); DPDPA: still no DPB; 8th year of AdTech inaction

Source: Parliamentary replies (Rajya Sabha, 2023 Budget Session — MP Sanjay Singh query on cyber attacks; MP Amar Patnaik query on TIDE 2.0); MeitY/CERT-In Annual Reports; PIB October 2025. **[GOVT SOURCE]**

SECTION III — RED FLAGS: REGULATORY INACTION & ENFORCEMENT OMISSIONS

3. Red Flags — Category A: Regulatory Inaction (8+ Years)

The following red flags represent situations where a foreign regulatory body publicly documented a violation of Indian citizens' rights, and Indian regulatory authorities failed to act for 8 or more years. Each red flag is followed by the specific writ citation, government source, and what the state must answer in affidavit.

RF-A1	**FTC Consent Order Against InMobi (June 2016) — 8 Years of MeitY Inaction** FTC Case C-4530 (June 22, 2016): InMobi Pte Ltd covertly tracked geolocation of approximately 100 million mobile devices including children's devices via WiFi scanning, even when users had disabled location sharing. USD 950,000 penalty; 20-year compliance regime. InMobi Technologies Pvt Ltd is the Indian entity with Indian operations. As of March 2026 — 8 years and 9 months after the FTC Consent Order became public — MeitY has never opened a single inquiry under IT Act Section 43A against InMobi for Indian users. Parliamentary question answers confirm zero enforcement. STATUS: UNRESOLVED.

[Writ p. 60–63] | **[GOVT SOURCE]** FTC public record; MeitY parliamentary replies; Writ Ground (d), Prayer 6(e).

GAP RF-A1-GAP	**STATE MUST ANSWER:** Has MeitY ever opened any inquiry, issued any show-cause notice, or initiated any proceeding under IT Act Section 43A against InMobi Technologies Pvt Ltd or InMobi Pte Ltd in respect of the FTC-documented conduct? If not — name the officer responsible, the written reason for inaction, and produce the file noting. **WHY CRITICAL:** The absence of any such record — provable by the absence of any MeitY press release, parliamentary answer, or court order — establishes 8 years of arbitrary non-exercise of statutory power, violating Article 14 of the Constitution.

RF-A2	**FTC Warning Letters — Silverpush SDK (March 2016) — Indian Company, Zero Indian Action** FTC Staff Warning Letters (March 17, 2016): Silverpush SDK uses inaudible ultrasonic audio beacons embedded in media content to activate smartphone microphones for cross-device tracking without user knowledge or consent. FTC identified 12 app developers using the SDK. Silverpush Technologies Pvt Ltd is an INDIAN company headquartered in Delhi NCR/Noida. Its SDK was embedded in 30+ Indian consumer apps (documented by November 2015 research paper). From March 2016 to March 2026 — 10 years — no Indian agency has investigated Silverpush under IT Act 2000 or SPDI Rules 2011. STATUS: UNRESOLVED.

[Writ p. 64–67] | **[GOVT SOURCE]** FTC public press release March 17, 2016; FTC Warning Letters; Writ Ground (d), Prayer 6(e).

GAP RF-A2-GAP	**STATE MUST ANSWER:** Has MeitY ever investigated whether Silverpush Technologies Pvt Ltd violated IT Act Section 43A and SPDI Rules 2011 through its ultrasonic audio beacon SDK? Has Silverpush been required to disclose: (a) all data collected from Indian devices since 2014; (b) all Indian apps in which the SDK was embedded; (c) whether data was shared with foreign entities? **WHY CRITICAL:** Silverpush is an Indian-domiciled company under Indian jurisdiction from day one. The argument that India 'needed to wait for foreign regulatory action' does not arise. 10 years of inaction on an Indian company's documented covert microphone surveillance is an Article 14 violation requiring specific justification.

RF-A3	**DPDPA 2023 — 31 Months of Non-Implementation (Parliament's Mandate Unenforceable)** Digital Personal Data Protection Act, 2023 enacted August 11, 2023 (Gazette of India). Mandatory provisions: (a) Data Protection Board — Section 18: 'The Central Government SHALL establish the Data Protection Board of India' — mandatory language; (b) Implementing Rules — Section 40: rules to be notified in prescribed period; (c) Breach Notification — Section 8: data fiduciary SHALL notify Board and affected persons within 72 hours. As of March 2026 — 31 months after enactment — Board: NOT CONSTITUTED. Rules: NOT NOTIFIED. Breach notifications to 80M affected citizens: ZERO. STATUS: PARLIAMENT'S PROTECTION MANDATE WHOLLY INOPERATIVE.

[Writ p. 57–59] | **[GOVT SOURCE]** Official Gazette August 11, 2023; MeitY Parliamentary Replies; Writ Ground (g), Prayer 6(g).

GAP RF-A3-GAP	**STATE MUST ANSWER:** Why has the Central Government failed to constitute the Data Protection Board for 31 months after Parliament's mandatory enactment? Who is the officer responsible for the delay? What written decision was made regarding the implementation timeline? When will: (a) the Board be constituted; (b) rules be notified; (c) breach notification be issued to 80M affected citizens? **WHY CRITICAL:** 'Shall constitute' is mandatory statutory language — the Supreme Court in multiple mandamus cases has held that 'shall' in a statute creates a non-discretionary obligation. The non-constitution of the Board is the most provable mandamus ground in this petition.

RF-A4	**Section 3(4) Extradition Act 1962 — 14 Years Available, Never Invoked** Section 3(4) of the Extradition Act, 1962, inserted by Act 66 of 1993 with effect from December 18, 1993, provides that the Central Government MAY TREAT ANY MULTILATERAL CONVENTION to which both India and the foreign State are parties as the basis for extradition. India ratified UNCAC (2011) and UNTOC (2011). China ratified UNCAC (2006) and UNTOC. Two legal bridges have existed since 2011. From 2011 to March 2026 — 14 years — not one extradition request under Section 3(4) has

	been filed against any Chinese national accused in any digital dacoity case. The Government's standard reason — 'no bilateral extradition treaty with China' — is legally incorrect under Section 3(4). STATUS: 14 YEARS — NEVER USED.

[Writ p. 108–112, E–F (Synopsis)] | **[GOVT SOURCE]** Section 3(4) Extradition Act (indiacode.nic.in); MEA Parliamentary Replies; ED press releases (zero extradition requests); Writ Ground + Prayers 6(b), 7(a).

GAP RF-A4-GAP	**STATE MUST ANSWER:** (a) Was Section 3(4) of the Extradition Act 1962 ever considered for invocation against any Chinese national accused in any digital dacoity case between 2011 and March 2026? (b) If considered and decided against — name the officer, the date of the decision, and the written reasons. (c) If not considered — explain why a legal tool available since 2011 was never considered for the largest cybercrime ecosystem in Indian history. **WHY CRITICAL:** This is the single most important question in the interim prayers. The Enforcement Directorate's own website has a page explaining UNCAC and India's obligations. The agency knows the tool exists. The failure to use it is deliberate — and deliberate non-exercise of an available legal tool against documented harm is arbitrary under Article 14.

RF-A5	**RBI 2020 Warning Circular — No Data Destruction Direction** RBI Circular RBI/2020-21/116 (December 23, 2020): RBI acknowledged that unauthorized digital lending apps were causing harm through access to mobile contacts and photographs (para 2). Despite knowing that these apps were harvesting and transmitting biometric and personal data to foreign servers, the Circular issued no direction for: (a) destruction of already-exfiltrated borrower KYC data; (b) forensic audit of NBFC data storage; (c) notification to affected borrowers; (d) investigation of data pipelines. STATUS: DATA HARM UNADDRESSED IN REGULATORY RESPONSE.

[Writ p. 68–70] | **[GOVT SOURCE]** RBI Circular RBI/2020-21/116 (rbi.org.in); Writ Para 2.7.1; Annexure P-6.

3.1 Category B Red Flags: Enforcement Omissions

RF-B1	**Zero Chinese National Arrests — 2019 to March 2026 (7 Years of Prosecuting Workers)** Operations Hawk (April 2024): 60 arrests, Rs. 800+ crore PMLA attachments — ALL 60 arrested persons are Indian nationals. Operation Chakra-II (August-September 2023): 43 arrests — ALL 43 are Indian nationals. Total arrests in Chinese loan app ecosystem 2019-2026: estimated 103+ — not one Chinese national prosecuted. Named principal Chinese accused: Zhu Wei (Jeffrey Zhu), Liu Yang, Zhuang Wei, Wang Xin, Chen Wei — none

arrested, none prosecuted, none extradited. STATUS: 7 YEARS OF PROSECUTING WORKERS WHILE ARCHITECTS REMAIN FREE.

[Writ p. 11–13, 82–85] | **[GOVT SOURCE]** ED Press Releases (enforcementdirectorate.gov.in); CBI Press Releases; ED PMLA Prosecution Complaints; Writ Para 2.5; Ground (e); Prayer 6(b).

GAP RF-B1-GAP

STATE MUST ANSWER: For each of the named Chinese principal accused (Zhu Wei, Liu Yang, Zhuang Wei, Wang Xin, Chen Wei), the state must disclose: (a) date on which Look Out Circular was issued; (b) whether LOC was issued before or after the accused's departure from India; (c) whether any extradition request has been filed in any jurisdiction; (d) current confirmed location as of March 2026; (e) whether any Interpol Red Corner Notice has been successfully processed.
WHY CRITICAL: The discriminatory pattern — Indian workers prosecuted, Chinese architects permanently free — violates Article 14 (E.P. Royappa arbitrariness doctrine). The State must explain the rational basis for this enforcement asymmetry.

RF-B2

Jeffrey Zhu Departed BEFORE Look Out Circular — Documented Intelligence Failure
Jeffrey Zhu (Zhu Wei), the single most important accused in the entire digital dacoity ecosystem, departed India BEFORE the Look Out Circular was issued against him. This is a documented investigative failure — the LOC is a reactive tool, not a preventive one, and its reactive nature is compounded by the intelligence failure that allowed the master custodian of 80 million Indian citizens' biometric records to carry that database out of India without any impediment. ED prosecution materials (Delhi ZO 2021-22) confirm his role. He has never faced a court in any jurisdiction as of March 2026. STATUS: APEX ACCUSED — FREE FOR 5+ YEARS WITH DATA.

[Writ p. 11–12, G (List of Dates: 2021 mid)]

GAP RF-B2-GAP

STATE MUST ANSWER: (a) On what specific date did Jeffrey Zhu / Zhu Wei depart India? (b) On what specific date was the LOC against him issued? (c) What was the intelligence available to ED/MHA prior to his departure indicating he was a flight risk? (d) Who was the officer responsible for the LOC decision, and why was the LOC not issued before his departure? (e) What actions has the Government taken since 2021 to locate him?
WHY CRITICAL: If the LOC was issued after departure, this establishes a documented intelligence failure of constitutional significance — the principal architect of the largest data theft in Indian history was allowed to leave with the stolen data. This is directly relevant to Prayer 6(a) (data recovery mandate).

RF-B3

I4C Budget Underspent 34% — 3 Consecutive Years (Parliament's Own Finding)

Parliamentary Standing Committee on Home Affairs — 237th Report (2023): The Indian Cyber Crime Coordination Centre (I4C), established as India's apex cybercrime coordination body under MHA, underspent approximately 34% of its allocated budget over three consecutive financial years. In context: in 2024 alone, Rs. 2,140 crore was lost to digital arrest fraud. The I4C budget allocated to combat this crime was not fully utilized. This is Parliament's own oversight finding — the respondent (MHA) cannot dispute it. STATUS: OFFICIAL FINDING OF RESOURCE UNDER-UTILIZATION AGAINST A DOCUMENTED NATIONAL EMERGENCY.

[Writ p. 79–81] | **[GOVT SOURCE]** 237th Report, Parliamentary Standing Committee on Home Affairs; Writ Annexure P-9.

RF-B4	**2.3% Cyber Crime Conviction Rate — Structural Justice Denial** NCRB Crime in India 2022: conviction rate for cybercrime cases approximately 2.5%. Crime in India 2023: approximately 2.3%. This means that of every 100 cybercrime accused who face trial, 97-98 are acquitted or discharged. Chargesheeting rate: approximately 38%, meaning 62% of investigated cybercrime cases never even result in a charge sheet. 78,940+ cases were pending trial as of 2022. This systemic failure makes the ordinary criminal justice system statistically unavailable for cybercrime victims — independently establishing the Supreme Court's jurisdiction under Article 32 (Anita Kushwaha v. Pushap Sudan, 2016). STATUS: STRUCTURALLY NEAR-ZERO EFFECTIVENESS RATE.

[Writ p. 93–95] | **[GOVT SOURCE]** NCRB Crime in India 2022 & 2023 (ncrb.gov.in); Writ Annexure P-13; Writ para 1B(i).

RF-B5	**Zero Data Recovery Orders — 2019 to March 2026 (7 Years of Money-Only Enforcement)** From 2019 to March 2026, not one of the following data-specific actions has been taken by any Respondent: (a) A court order, ED attachment order, or diplomatic note demanding return or forensic destruction of exfiltrated Indian citizen data held on servers outside India; (b) A formal extradition request for data recovery against any named Chinese national principal accused; (c) A forensic investigation specifically directed at the data pipeline and backend server infrastructure; (d) Notification to any of the 80 million+ affected Indian citizens that their biometric data was exfiltrated; (e) Any investigative action in response to specific intelligence submitted by the petitioner. STATUS: DATA HARM — PERMANENTLY UNADDRESSED.

[Writ p. 15–16 (Para 2.7.1)] | **[GOVT SOURCE]** ED/CBI Press Releases (zero data recovery); RBI Circulars (no retrospective data provisions); Writ Para 2.7.1; Prayer 6(a).

RF-B6	**7 Chinese Nationals Deported WITHOUT Criminal Prosecution (2020–2021)** December 2020 (Telangana Police FIR): 6 unnamed Chinese nationals arrested at Hyderabad call centre linked to 17 deaths by suicide — DEPORTED WITHOUT CRIMINAL CONVICTION. March 2021 (Pune Cyber Cell FIR): Wang Fang (female, Chinese national), arrested for call

	centre setup and coordination — DEPORTED WITHOUT CRIMINAL PROSECUTION. India voluntarily surrendered its only leverage — criminal prosecution in an Indian court — in exchange for nothing. Chinese authorities recorded no criminal proceedings against any of these individuals. This pattern of arrest-without-prosecution-before-deportation incentivizes future Chinese operators to continue operating with the knowledge that Indian criminal jurisdiction will not be exercised against them. STATUS: IMPUNITY BY PROCESS.

[Writ p. 12–13 (Para 2.5 table)] | **[GOVT SOURCE]** Telangana Police FIR 2020; Pune Cyber Cell FIR 2021; ED records; Writ Para 2.5.

SECTION IV — COMPLETE CROSS-MATCH: EVERY WRIT GROUND vs. OFFICIAL EVIDENCE (WITH WRIT PAGINATION)

4. Cross-Mapping: Constitutional Grounds, Writ Pages, Evidence Sources, State Gaps

This section maps **every question of law and every ground** in the writ petition to: (a) the specific writ pages where the ground appears; (b) the official government evidence corroborating it; (c) the gap requiring state affidavit; and (d) the strength rating of the evidence.

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
QUESTION (a): Art. 21 — Three-layer data theft as continuing privacy violation (Android permissions, NBFC KYC, AdTech SDK)	Writ pp. 16 [Q(a)], 8–11 [Para 2.3], 23 [Ground (b)]	CloudSEK 2021–22: 80M+ records confirmed. Group-IB India 2022: pipeline traced. FTC C-4530: InMobi SDK confirmed. FTC 2016 Warning: Silverpush confirmed. ED forensic exhibits: permissions bundle documented.	Whether any investigation was ever directed at the data pipeline as a distinct forensic target (Prayer 7(b)); whether any IT Act S.43A action was ever taken against any loan app operator.	YES	★★★★★
QUESTION (b): Art. 21 — Right to Life: Deaths and torture caused by weaponised data (digital arrest, sextortion, loan app harassment)	Writ pp. 16 [Q(b)], 23–24 [Ground (c)], C [Synopsis para 6]	I4C Annual Report 2024: Rs. 2,140 crore loss from digital arrest; 105 calls/hour. NCRB: 83+ deaths (state FIRs). Maharashtra Cyber 2023: sextortion using harvested photos. PM Modi Mann Ki Baat Oct 27, 2024: personal reference to 26-day digital arrest.	Whether the State was on notice of deaths and torture linked to loan app ecosystem from 2020 (when Telangana Police FIR was registered for 17 deaths), and what data-specific action was	YES	★★★★★

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
			taken after that notice.		
QUESTION (c): Art. 14 — Arbitrary investigation architecture: money pursued, data ignored	Writ pp. 17 [Q(c)], 24 [Ground (d)], C–D [Synopsis paras 8–9]	Operation Hawk ED Press Release (April 2024): Rs. 800+ crore attached — ZERO data recovery. Operation Chakra-II CBI Press Release (2023): 43 arrests — ZERO data recovery. I4C 2024: Rs. 2,140 crore from data-enabled fraud — no data address.	In Operation Hawk and Chakra-II: (a) how many mobile devices were seized; (b) whether harvested data was forensically traced; (c) whether any data recovery order was sought; (d) specific reasons why not.	YES	★★★★★
QUESTION (d): Art. 14 — Eight years of inaction on FTC-documented AdTech violations	Writ pp. 17 [Q(d)], 24–25 [Ground (d)], 60–67 [Annexures P4–P5]	FTC Consent Order C-4530 (June 2016): public record. FTC Warning Letters March 2016: public record. Parliamentary Q&A 2023: no inquiry under IT Act S.43A against InMobi confirmed by omission. CAG Report 15/2022: no proactive enforcement on foreign regulatory findings.	MeitY Respondent No. 1 must: (a) confirm or deny any inquiry was opened; (b) if not — name officer, date, reasons; (c) produce the file noting for the period 2016–2026 showing awareness and decision-making.	YES	★★★★★
QUESTION (e): Art. 19(1)(a) — Mass	Writ pp. 17 [Q(e)], 25	FTC InMobi order: 100M devices tracked. Silverpush: microphone access confirmed. 80M	Whether any agency has assessed the chilling effect	INDIRECT	★★★★☆

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
surveillance chilling effect on digital expression	[Ground (f)]	KYC records: contacts, SMS, location in criminal hands. Digital arrest calls use Aadhaar-linked address (I4C data).	on digital communications and civic participation caused by the knowledge that 80M citizens' device data is in criminal hands.		
QUESTION (f): Data Sovereignty — Ram Jethmalani extension to stolen citizen biometric data	Writ pp. 17–18 [Q(f)], 26 [Ground (g)]	Ram Jethmalani v. UOI (2011) 8 SCC 1: SC established State duty to pursue national assets held abroad. Data is more fundamental than money (biometrics cannot be changed). CloudSEK: 80M records on foreign servers.	Whether the Government has: (a) ever treated stolen citizen biometric data as a 'national asset' requiring recovery; (b) issued any diplomatic note on data return; (c) considered MLAT requests for data on servers in Singapore, UAE, or Cambodia.	LEGAL QUESTION	★★★★★
QUESTION (g): DPDPA 2023 Non-Operationalisation — Mandamus	Writ pp. 18 [Q(g)], 26–27 [Ground (h)], 57–59 [Annexure P-3]	Official Gazette: Act enacted 11 August 2023 — incontrovertible. MeitY Parliamentary Replies: Board not constituted. Rules not notified (confirmed by absence of any Gazette notification). 31 months = documented statutory omission.	(a) When will the DPB be constituted? (b) When will implementing rules be notified? (c) When will breach notification	YES	★★★★★

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
			be issued to 80M affected citizens? (d) What specific factor prevented compliance with Parliament's mandate?		
QUESTION (h): Structural judicial intervention — five-generation pattern demonstrates app-level enforcement is insufficient	Writ pp. 18 [Q(h)], 27 [Ground (i)], 13–14 [Para 2.6 table]	Five-generation table (Para 2.6): Gen 1 (2017–2020) through Gen 5 (2025–2026). Each generation reconstitutes in 48–72 hours. PIB October 2025: Gen 5 AI-automated confirmed. I4C 2024: 28.15 lakh complaints despite 5 generations of enforcement.	Whether existing SOPs (Mule AI Hunter, Telecom SOP, CNAP, 1930 helpline) address the backend infrastructure rather than app-level manifestations; whether any SOP targets the data pipeline.	YES — Root Cause Affidavit	★★★★★
QUESTION (i): Failure to act on intelligence — accountability and remedy	Writ pp. 18 [Q(i)], 28 [Ground (i)], 96–107 [Annexures P-14, P-15]	PMO Grievance PMOPG/E/2025/0190679 (Dec 2025); PMOPG/E/2026/0027145 (Feb 2026); PMOPG/E/2026/0027165 (Feb 2026); MHA Appeal MINHA/E/A/26/0000249; MeitY Appeal MINIT/E/A/26/0000185; Speed Post EP919337267IN, EP919337448IN, EP919337372IN, EP919337253IN: all delivered, acknowledged,	For each submission by the petitioner: (a) name the officer who received it; (b) date of receipt; (c) action taken; (d) if no action — specific reasons and officer who decided	YES	★★★★★

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
		zero investigative action triggered.	against action.		
GROUND (b): Art. 21 — Three-layer technical mechanism	Writ pp. 8–11 [Para 2.3], 23 [Ground (b)]	Permission table (Para 2.3.1, Writ pp. 8–9): READ_CONTACTS, READ_SMS, ACCESS_FINE_LOCATION, READ_CALL_LOGS, CAMERA, RECORD_AUDIO, GET_ACCOUNTS, PROCESS_OUTGOING_CALLS — all with zero legitimate lending purpose, all documented in ED forensic exhibits and CloudSEK APK analysis.	Whether any seized devices from Chinese loan app cases had permissions bundle forensically analysed; whether IT Act S.66 was ever invoked against SDK operators (InMobi, Silverpush) for this permissions exploitation.	YES	★★★★★
GROUND (e): Art. 14 — Prosecution of workers, impunity of architects	Writ pp. 25 [Ground (e)]	ED/CBI press releases (Annexure P-10, Writ pp. 82–85): 103 arrests — all Indian nationals. Para 2.5 table (Writ pp. 11–13): all 7 Chinese nationals either absconded or deported without prosecution. NCRB 2.3% conviction rate (Writ pp. 93–95).	Whether there is a rational basis for prosecuting Indian call centre workers while filing no extradition request against the Chinese architects who designed the system, controlled the backend, and monetised the data.	YES	★★★★★

Writ Ground / Question of Law	Writ Pages	Official Corroborating Evidence	State Must Answer (Gap)	Govt Source	Strength
GROUND (j): State's Positive Constitutional Duty — Omission as Constitutional Tort	Writ pp. 27–28 [Ground (j)]	M.C. Mehta Oleum Gas (1987); Nilabati Behera (1993); NALSA (2014): State bears positive obligation to protect from large-scale, systematic violations where: (1) violation is systematic — CONFIRMED (80M records, 7+ years); (2) State has regulatory capacity — CONFIRMED (IT Act, PMLA, Extradition Act all available); (3) State omits to exercise capacity — CONFIRMED by absence of any data recovery, extradition, or DPB constitution.	Whether the State accepts that its documented pattern of omissions from 2019 to 2026 constitutes a continuing constitutional tort; and what specific remedial actions have been taken or are planned.	YES	★★★★★

SECTION V — OPEN-SOURCE POLICE STATION RECORDS & FIR ANALYSIS

5. Police Station Records — FIR Data Cross-Referenced with Writ Petition

The following open-source FIR records, state police reports, and enforcement press releases are cross-referenced with specific writ petition pages, establishing the chain of evidence from crime to regulatory failure to constitutional violation.

5.1 Critical FIR Records — State-by-State Analysis

State/PS	Police Unit & Case	FIR Facts	Constitutional Relevance	Writ Citation	Source
Telangana	Cyber Crime Police Station, Hyderabad (Dec 2020)	14 persons arrested including 6 Chinese nationals at Chinese loan app call centre. 17 deaths by suicide in Telangana and Andhra Pradesh directly linked to loan app harassment using harvested contact and photo data. 6 Chinese nationals DEPORTED December 2020 WITHOUT criminal conviction.	Art. 21 violation (17 deaths). Red Flag RF-B6 (deportation without prosecution). Chinese architects escaped jurisdiction. Layer 1 (photo harvest enabling harassment) and Layer 2 (NBFC KYC) operational.	Writ pp. 12–13 (Para 2.5 table); pp. G (List of Dates Dec 2020)	Telangana Police FIR 2020; ED records

State/PS	Police Unit & Case	FIR Facts	Constitutional Relevance	Writ Citation	Source
Pune, Maharashtra	Pune Cyber Cell FIR (2021); ED PMLA Complaint	Wang Fang (female, Chinese national) arrested for call centre setup and coordination. DEPORTED March 2021 WITHOUT criminal prosecution before departure. India had Wang Fang in custody, could have prosecuted, and chose deportation.	Documents deportation-without-prosecution pattern. India voluntarily relinquished criminal jurisdiction. Constitutional tort: deliberate omission when capacity existed.	Writ pp. 12 (Para 2.5 table, Wang Fang row)	Pune Cyber Cell FIR 2021; ED records
Karnataka	Karnataka Police FIR (Loan App Network) + ED PMLA Prosecution Complaint 2023	Liu Yang / 'Michael Yang' identified as beneficial owner of PowerBank Digital Tech and 3 app networks in India. LOC issued. No extradition request filed as of March 2026. Absconded	Illustrates Red Flag RF-B1 (Chinese principal, LOC issued, no extradition). Directly corroborates the Section 3(4) Extradition Act ground.	Writ pp. 12 (Para 2.5 table, Liu Yang row)	Karnataka Police FIR; ED Prosecution Complaint 2023

State/PS	Police Unit & Case	FIR Facts	Constitutional Relevance	Writ Citation	Source
		to Shenzhen.			
Delhi	ED ZO Delhi PMLA Complaints 2021–22; Multiple Delhi Police/EOW FIRs	Multiple FIRs against Jeffrey Zhu / Zhu Wei as apex financial controller, data pipeline architect, and master database custodian. LOC issued AFTER departure. Present location: believed Shenzhen. Never prosecuted in any jurisdiction.	Most critical FIR record. Jeffrey Zhu holds 80M+ Indian citizens' biometric records. No extradition request. Section 3(4) never invoked. Directly corroborates RF-A4 and all extradition grounds.	Writ pp. 11–12 (Para 2.5, Jeffrey Zhu row); pp. G (List of Dates 2021 mid)	ED Delhi ZO PMLA Complaints 2021–22
Joint (35 Cities)	Operation Hawk — ED Multi-State (April 2024)	60 arrests across 35 cities. Rs. 800+ crore PMLA attachments. ALL 60 arrested: Indian nationals at call centre and mule account level. ED press release: no mention of data	Official confirmation: 7 years of operations have produced zero Chinese arrests, zero data recovery. Money metric = only metric reported. Discriminatory enforcement	Writ pp. 20–21 (Ground (d)); pp. 82–85 (Annexure P-10)	ED Press Release April 2024 (enforcementdirectorate.gov.in)

State/PS	Police Unit & Case	FIR Facts	Constitutional Relevance	Writ Citation	Source
		recovery action. No mention of any Chinese national arrest or extradition.	violates Art. 14.		
Joint (Multi-State)	Operation Chakra-II — CBI (Aug–Sep 2023)	43 arrests. Rs. 415 crore fraud documented. All arrested: Indian nationals. Operated as cyber fraud facilitation network. No Chinese principal arrested.	Confirms the enforcement asymmetry pattern. Data pipeline forensics: absent from any press release or subsequent court record.	Writ pp. 82–85 (Annexure P-10)	CBI Press Releases Aug–Sep 2023 (cbi.gov.in)
All States (NCRP)	National Cyber Crime Reporting Portal — 2019 to 2025	4.6 million complaints registered 2019–2025. Rs. 36,448 crore total reported loss (to Feb 2025). Digital arrest complaints: 920,000+ in 2024 (= 105/hour). Recovery rate: 28%. FIR conversion rate:	Scale of Art. 21 violations corroborated by official State data. 2.4% FIR conversion rate = systemic access to justice failure = SC intervention justified under Art. 32.	Writ pp. 74–78 (Annexure P-8); pp. C (Synopsis para 6)	cybercrime.gov.in; I4C Annual Report 2024

State/PS	Police Unit & Case	FIR Facts	Constitutional Relevance	Writ Citation	Source
		approximately 2.4% of portal complaints.			
SE Asia (MEA data)	MEA Parliamentary Reply — Myanmar/SE Asia Cyber Compounds (Dec 2024)	5,200+ Indian nationals trafficked to cyber fraud compounds in Myanmar, Cambodia, Thailand 2020–2024. 3,100+ repatriated. 2,100+ unaccounted. Workers enslaved to operate Chinese-directed fraud operations targeting Indian citizens.	State acted to rescue enslaved workers but did not dismantle the data pipeline that funded operations. Art. 21 (trafficking and slavery) + Art. 14 (arbitrary enforcement: rescued workers, ignored data pipeline). MEA itself acknowledges transnational criminal ecosystem.	Writ pp. 90–92 (Annexure P-12); pp. 3 (Para 1 — introduction)	MEA Parliamentary Reply Dec 2024 (loksabha.nic.in; rajyasabha.nic.in)

5.2 FIR Registration Gap — The Systemic Access to Justice Failure

CRITICAL FINDING: Early analysis (CSO Online, citing NCRP data) showed that only 790 of 33,152 portal reports led to FIR registration — a conversion rate of approximately 2.4%. Combined with the 2.3% conviction rate, this means: out of 100 cybercrime incidents reported to the State, approximately 2-3 result in a registered FIR, and of those, approximately 2-3% result in conviction. The effective justice rate for cybercrime in India is statistically near zero. This independently establishes the Supreme Court's jurisdiction under Article 32 — where ordinary remedy is structurally unavailable, the constitutional court must intervene.

This finding directly corroborates Writ Petition Para 1B(i) (Maintainability) **[Writ p. 6–7]** and Ground based on NCRB data **[Writ p. 93–95]**. The argument: if 97.6% of complaints never result in FIR, and 97.7% of those tried are acquitted, the ordinary criminal justice system is not 'alternative and

efficacious' for cybercrime — making Article 32 PIL jurisdiction not just appropriate but constitutionally necessary.

SECTION VI — NCRB STATISTICS, FINANCIAL LOSS DATA & ENFORCEMENT METRICS (2017–2026)

6. Official Statistical Evidence — NCRB, I4C, MHA Data

6.1 NCRB Cybercrime Case Data — Year-by-Year (2017–2024)

Year	Cyber Crime Cases Registered (FIR)	Charge-Sheeting Rate	Conviction Rate	Pending Trial	Writ Citation + Key Event
2017	33,147 (est)	~47%	~3.5%	Rising	Writ p. G (List of Dates): 400–600 Chinese loan apps active
2018	27,248	~45%	~3%	Increasing	Writ p. G: InMobi FTC inaction Year 3; Silverpush Year 3
2019	44,546	~43%	~2.8%	Significant	Writ p. G: COVID begins Dec 2019; data exfiltration begins
2020	50,035	~42%	~2.6%	Large backlog	Writ p. G: GoI bans 59 apps (S.69A); 17 deaths Telangana; 6 Chinese deported
2021	52,974	~40%	~2.5%	78,940+	Writ p. G: Jeffrey Zhu departs; 80M KYC appears on dark web; CloudSEK documents
2022	65,893	~42%	~2.5%	78,940	Writ pp. 93–95 (NCRB); pp. 79–81 (237th Ctte): RBI 2022

Year	Cyber Crime Cases Registered (FIR)	Charge-Sheeting Rate	Conviction Rate	Pending Trial	Writ Citation + Key Event
					Guidelines issued
2023	1,28,893	~38%	~2.3%	Increasing	Writ pp. 93–95: DPDPA enacted; DPB not constituted; conviction rate at 2.3%
2024 (I4C)	22,68,000 (NCRP complaints)	N/A (portal)	~2.3%	Massive	Writ pp. 74–78: Rs. 2,140 crore from digital arrest. PM Modi Mann Ki Baat Oct 27, 2024.
2025 (est)	28,15,000 (NCRP)	N/A	~2.3%	Growing	PIB Oct 2025: Rs. 22,495 crore total loss. 28.15 lakh cases. Gen 5 AI-automated fraud.

Sources: NCRB Crime in India 2022 & 2023 (ncrb.gov.in); I4C Annual Reports 2022–2024; PIB October 2025; IndiaSpend December 2025; CyberPeace Foundation March 2026. **[GOVT SOURCE]**

6.2 Financial Loss Data — Official I4C/NCRP Sources

Loss Category	Period	Official Loss Figure	Official Source	Writ Citation
Total cyber fraud losses (6 years)	2020–2025	Rs. 52,976 crore	I4C/NCRP via Indian Express (January 2026)	Writ pp. C, 3, 5
Digital arrest fraud losses	2024 alone	Rs. 2,140 crore	MHA I4C Annual Report 2024	Writ pp. 74–78 (Annex P-8); C (Synopsis)
Investment/task fraud losses	2024	Rs. 17,400–22,845 crore	Lisianthus Technologies / I4C 2024	Writ pp. 74–78

Loss Category	Period	Official Loss Figure	Official Source	Writ Citation
Total NCRP reported loss	To Feb 28, 2025	Rs. 36,448 crore	NCRP Portal official statistics (cybercrime.gov.in)	Writ pp. 74–78
PMLA attachment — Operation Hawk	April 2024	Rs. 800+ crore attached	ED Press Release April 2024	Writ pp. 82–85 (Annex P-10)
PMLA attachment — Operation Chakra-II	Aug–Sep 2023	Rs. 415 crore documented	CBI Press Release 2023	Writ pp. 82–85 (Annex P-10)
I4C funds recovered/frozen (cumulative)	To 2025	Rs. 8,031 crore	PIB October 2025	Writ pp. 74–78
Digital arrest/scam loss (estimated to 2026)	2020–2026	Rs. 1.5 Lakh crore (petitioner's estimate based on official trajectory)	Petitioner's calculation from I4C data	Writ pp. 3, 5 (Para 1)
Total financial fraud as % of cyber complaints	2023–2024	~67% of all NCRP complaints	I4C Annual Report 2024	Writ pp. 74–78
2025 total losses (confirmed)	2025	Rs. 22,495 crore (slightly down from 22,845 crore)	PIB/I4C 2025; InsightsOnIndia Feb 2026	PIB Oct 2025

6.3 Enforcement Operations Data — Zero Chinese National Metric

Operation	Year	Arrests	Money Attached	Chinese Nationals Arrested	Data Recovery Action
Operation Hawk (ED Multi-State)	April 2024	60 (ALL Indian nationals)	Rs. 800+ crore (PMLA)	ZERO	ZERO — not mentioned in any press release or court filing
Operation Chakra-II (CBI Multi-State)	Aug–Sep 2023	43 (ALL Indian nationals)	Rs. 415 crore documented	ZERO	ZERO

Operation	Year	Arrests	Money Attached	Chinese Nationals Arrested	Data Recovery Action
Telangana Cyber Cell (Chinese loan apps)	December 2020	14 (incl. 6 Chinese)	Not specified	6 — DEPORTED without prosecution	ZERO
Pune Cyber Cell (Wang Fang)	March 2021	Wang Fang (1 Chinese national)	Not specified	1 — DEPORTED without prosecution	ZERO
Various State Operations (2019–2023)	2019–2023	~200+ (all Indian nationals at operational level)	Various attachments	ZERO Chinese prosecuted anywhere	ZERO in any case
COMBINED TOTAL (2019–March 2026)	7 years	103 named + many others (all Indian nationals)	Rs. 1,200+ crore combined	ZERO Chinese national prosecuted in any court in any jurisdiction	ZERO data recovery orders in any court in any jurisdiction

Sources: ED Press Releases (enforcementdirectorate.gov.in); CBI Press Releases (cbi.gov.in); Telangana Police FIR 2020; Pune Cyber Cell FIR 2021. **[GOVT SOURCE]**

SECTION VII — CHINESE ABSCONDERS: COMPLETE STATUS MATRIX WITH WRIT CITATIONS

7. Status of Named Chinese Principal Accused as of March 2026

Writ petition Para 2.5 (Writ pp. 11–13) provides a detailed table of named Chinese principal accused. This section reproduces and expands that table with official source references and specific gaps requiring state affidavit answers under interim Prayer 7(f). **[Writ p. 11–13]**

Name/Alias	Role	LOC Status	Interpol RCN	Extradition Request S.3(4)	Status March 2026	Specific Failure
Zhu Wei / 'Jeffrey Zhu' (朱伟)	APEX: Financial controller; data pipeline architect; master database custodian of 80M+ records; crypto exit operator	Issued AFTER departure from India (intelligence failure)	Applied to NCB. Status: UNCONFIRMED — no successful processing on record	NONE FILED — in 14 years of available Section 3(4) authority	Believed in Shenzhen or Dubai. NEVER prosecuted anywhere.	LOC issued after departure. No treaty invoked. Master database of 80M Indian records remains accessible to him.
Liu Yang / 'Michael Yang'	Beneficial owner; PowerBank Digital Tech; oversaw 3 app networks in India	Issued	Applied	NONE FILED	Absconded to Shenzhen. Never prosecuted.	Same structural failure: LOC issued; no follow-through on extradition. No MLAT to Singapore/UAE for corporate entity records.
Zhuang Wei / 'David Zhuang'	Financial controller; fund routing India-UAE-China via	Issued	Applied	NONE FILED — despite UAE bilateral relations and	Believed in Dubai. UAE cooperation formally requested; no result.	Extradition Act Section 3(4) never invoked for UAE despite bilateral relations. No

Name/Alias	Role	LOC Status	Interpol RCN	Extradition Request S.3(4)	Status March 2026	Specific Failure
	USDT crypto			extradition channels		MLAT request for Dubai-held assets.
Wang Xin / 'Sunny Wang'	Apex operator; beneficial owner of 5+ apps; second-tier cluster	Diffusion notices only	Diffusion only	NONE FILED	Believed in Hong Kong. Not prosecuted in any jurisdiction.	Diffusion notice is not an extradition request. No criminal proceedings initiated in any foreign jurisdiction.
Chen Wei / 'James Chen'	IT infrastructure head; managed C2 backend servers physically located in India 2018–2020	Issued	Applied	NONE FILED — 'no treaty' excuse used despite Section 3(4) availability	Believed in Shenzhen. Never tried.	Departed before prosecution could commence. Section 3(4) available and never used.
Wang Fang (female)	Call centre setup and coordination, Pune operations	N/A — arrested	N/A	N/A	DEPORTED March 2021 WITHOUT criminal prosecution before deportation	India relinquished criminal jurisdiction — arrested, custody, released to deportation without charge. Chinese authorities took no recorded action.

Name/Alias	Role	LOC Status	Interpol RCN	Extradition Request S.3(4)	Status March 2026	Specific Failure
6 unnamed Chinese nationals	Operational call centre staff, Chinese loan app, Hyderabad	N/A — arrested	N/A	N/A	DEPORTED December 2020 WITHOUT criminal conviction	Same pattern: arrest, custody, deport. Indian criminal prosecution surrendered voluntarily.

GAP
ABSCONDERS-GAP

STATE MUST ANSWER: For each named accused (Zhu Wei, Liu Yang, Zhuang Wei, Wang Xin, Chen Wei) state must file affidavit per Prayer 7(f) disclosing: (a) exact date LOC issued; (b) exact date of accused's departure from India; (c) whether LOC was issued before or after departure; (d) confirmed current location as of March 2026; (e) whether any formal extradition request was filed in any jurisdiction; (f) whether any Red Corner Notice was successfully processed by Interpol; (g) for Wang Fang and the 6 unnamed — the specific officer who decided on deportation without prosecution and the written reasons.

WHY CRITICAL: These facts are within exclusive government knowledge. The court cannot assess the State's compliance with its constitutional duty without these disclosures. The negative inference from non-disclosure is that no extradition request exists — which is itself a constitutional omission.

SECTION VIII — FIVE-GENERATION THREAT EVOLUTION: ENFORCEMENT GAP ANALYSIS

8. Five-Generation Pattern — Why App-Level Enforcement Cannot Stop Infrastructure-Level Crime

Writ petition Para 2.6 (Writ pp. 13–14) documents five successive generations of the same criminal operation. Each generation reconstitutes itself within 48–72 hours when an individual app is banned. This section expands that analysis with official source corroboration. **[Writ p. 13–14]**

Gen	Period	Method	State Response	Reconstitution Time	What Continued Unchanged (Official Source)
Gen 1	2017–2020	Play Store APK with permissions bundle. ~400–600 apps (CashBean, RupeeLend, CashMama, ZipLoan, Quick Rupee, MiCredit, LoanZone, RupeeGo). Mass data harvesting via permissions.	Individual Play Store removals from 2020. GoI bans 59 Chinese apps under IT Act Section 69A (June 2020).	48–72 hours (new developer account, same backend)	Backend C2 servers (Alibaba Cloud China / AWS Singapore), data collection SDK, NBFC credential, Chinese operators. SDK in non-banned apps: UNAFFECTED. (ED forensic analysis; CloudSEK APK analysis Annexure P-11, Writ pp. 86–89)
Gen 2	2020–2022	Direct APK via WhatsApp + SMS links. Sideloading. Bypasses Play Store entirely.	No effective response. WhatsApp distribution outside MeitY's app store enforcement reach.	Instant — no Play Store approval required	Everything from Gen 1. Identical technical architecture. Data pipeline fully operational. (Group-IB India 2022; Annexure P-11, Writ pp. 86–89)
Gen 3	2022–2023	Play Store app with acquired legitimate NBFC name	RBI enforcement against shell	48–72 hours (new NBFC	SDK, Chinese operators, data exfiltration

Gen	Period	Method	State Response	Reconstitution Time	What Continued Unchanged (Official Source)
		displayed (RBI 2022 mandate compliance). Same data pipeline behind compliant facade.	NBFCs (Cred Fintech, Acemoney, Transerve — prosecuted under PMLA). App removed after complaint.	credential purchased)	pipeline. New NBFC credential easily acquired. (RBI/MHA enforcement records; Para 2.6, Writ pp. 13–14)
Gen 4	2023–2025	Telegram-based lending. No Android app. KYC collected via Telegram bot. Victim voluntarily uploads Aadhaar to bot.	I4C advisories. Individual Telegram channel takedown requests. 34% compliance by Telegram. No structural response.	Instant — new bot deployed in minutes	Chinese operators, data collection, backend database merger, dark web sale. No permissions needed — victim self-uploads biometric data. (I4C Annual Reports 2023, 2024; PIB October 2025)
Gen 5	2025–2026	Fully AI-automated. No Indian employee anywhere. Voice-cloned officials, deepfake police video calls, automated chatbot fraud scripts. Operates from UAE/Cambodia/China servers.	Individual deepfake advisories (MHA 2024, 2025). No structural intervention. No diplomatic action on servers.	Never reconstitutes — was never disrupted. Infrastructure now entirely outside Indian jurisdiction.	Everything. Architecture is now permanent and unreachable without diplomatic and international legal intervention. (PIB October 2025; I4C 2025 data; InsightsOnIndia Feb 2026)

STRUCTURAL CONCLUSION: The five-generation pattern demonstrates with mathematical certainty that app-level enforcement is insufficient. Gen 1 through Gen 5 all share the same backend: Zhu Wei's database. The only interventions that would break this cycle are: (a)

targeting the backend server infrastructure and the data it holds [Prayer 6(a)]; (b) prosecuting or extraditing the Chinese principal operators [Prayer 6(b)]; (c) creating structural regulatory mechanisms through the Data Protection Board, real-time NBFC verification, and mandatory SDK audits [Prayers 6(g)–6(i)]. This petition asks for all three. The State has pursued none of the three in seven years.

GAP GEN5-GAP	STATE MUST ANSWER: Whether existing government SOPs — Mule AI Hunter, Telecom SOP, CNAP, and I4C helpline 1930 — address the backend infrastructure (data pipeline, C2 servers, Chinese operator database) or only the front-end app-level manifestations; and whether the Root Cause Analysis underlying these SOPs identified the three-layer data collection architecture as the proximate cause enabling digital arrest fraud. WHY CRITICAL: If the SOPs address only app-level manifestations, they are structurally incapable of stopping a crime that reconstitutes every 48–72 hours. The Root Cause Analysis must be placed before the court to establish whether the state has correctly diagnosed the problem it is trying to solve.

SECTION IX — COMPLETE STATE ANSWER REQUIREMENTS: EVERY GAP MAPPED TO INTERIM PRAYER

9. State Must Answer — All Gaps Requiring Court-Directed Affidavit Disclosure

This section consolidates all gaps identified throughout this evidence pack and maps each to the specific interim prayer in the writ petition (Writ pp. 36–38). This is the **'what the state must answer'** master list.

Prayer Ref	Interim Prayer (from Writ)	Specific Questions State Must Answer	Evidence Already on Record	Writ Pages	Deadline Prayed
7(a)	Extradition Affidavit: whether Section 3(4) ever invoked against any named Chinese accused	(i) Was Section 3(4) of the Extradition Act 1962 read with UNCAC Art. 44 ever invoked against any Chinese national accused? (ii) If not — name the officer who decided against invocation and the written reasons recorded in the file. (iii) Confirmed current location of Zhu Wei alias Jeffrey Zhu. (iv) Was LOC issued before or after his departure from India?	MEA parliamentary replies: zero extradition requests. ED press releases: zero Chinese nationals arrested. Section 3(4) text: tool has existed since December 18, 1993. UNCAC: India ratified 2011, China ratified 2006.	Writ pp. 28 [Ground(a)], 36 [Prayer 7(a)], 108–112 [Annex P-16]	2 weeks
7(b)	Data Affidavit: whether any seized citizen data from Chinese loan app cases is in any government agency's custody	(i) Whether any seized citizen data from Chinese loan app ecosystem is in any government agency's custody. (ii) If yes — why no notification was given to affected citizens. (iii) If no — why citizen data was never treated	Operation Hawk press release: zero data recovery mentioned. PMLA Section 8 allows attachment of 'proceeds' — data as proceeds never used.	Writ pp. 29 [Ground(b)], 36–37 [Prayer 7(b)], 82–85 [Annex P-10]	2 weeks

Prayer Ref	Interim Prayer (from Writ)	Specific Questions State Must Answer	Evidence Already on Record	Writ Pages	Deadline Prayed
		as distinct forensic investigation target. (iv) Whether any court has ever been petitioned for data destruction order against exfiltrated Indian citizen data on foreign servers.	No court record of any data destruction application traced in any public document.		
7(c)	Root Cause Affidavit: documented Root Cause Analysis underlying SOPs	(i) The documented Root Cause Analysis underlying: Mule AI Hunter, Telecom SOP, CNAP, I4C 1930 helpline. (ii) Whether any such analysis identified the three-layer data architecture — Android permissions exploitation, shell NBFC KYC collection, AdTech SDK surveillance — as the proximate cause enabling digital arrest fraud.	Five-generation pattern (Para 2.6, Writ pp. 13–14) shows app-level SOPs repeatedly fail. Standing Committee 237th Report (Writ pp. 79–81) documents coordination gaps. No public record of any Root Cause Analysis addressing data pipeline.	Writ pp. 29 [Ground(c)], 37 [Prayer 7(c)], 79–81 [Annex P-9]	3 weeks
7(d)	Victim Profiling Affidavit: how fraudsters obtained real-time targeting intelligence	(i) In documented digital arrest cases, how fraudsters knew victim was alone, had significant balance, and had received no recent family calls — intelligence exceeding what a static KYC database can	FTC InMobi: real-time WiFi collection even with GPS OFF (Writ pp. 60–63). FTC Silverpush: audio beacon microphone access (Writ pp. 64–67). No Indian investigation	Writ pp. 29 [Ground(d)], 37 [Prayer 7(d)], 60–67 [Annex P-4 & P-5]	3 weeks

Prayer Ref	Interim Prayer (from Writ)	Specific Questions State Must Answer	Evidence Already on Record	Writ Pages	Deadline Prayed
		provide. (ii) Whether any agency investigated whether InMobi or Silverpush SDK data contributed to this real-time targeting capability.	of this profiling mechanism. I4C data shows 105 calls/hour targeting precision.		
7(e)	AdTech Affidavit: any inquiry or proceeding against InMobi/Silverpush	(i) Whether any inquiry, investigation, show-cause notice, or penalty proceeding was ever initiated against InMobi Technologies Pvt Ltd or InMobi Pte Ltd under Section 43A of the IT Act 2000 in respect of the conduct documented in FTC Consent Order (Docket C-4530, 2016). (ii) Same for Silverpush Technologies Pvt Ltd in respect of FTC Warning Letters (March 2016). (iii) If not — specific reasons for 8–10 years of inaction on documented covert surveillance.	FTC Consent Order C-4530 (June 22, 2016): public record. FTC Warning Letters March 17, 2016: public record. Parliamentary Q&A: no IT Act S.43A action against InMobi or Silverpush (confirmed by absence of any record). CAG Report 15/2022: no proactive enforcement on foreign findings.	Writ pp. 29–30 [Ground(e)], 37 [Prayer 7(e)], 60–67 [Annex P-4 & P-5]	2 weeks
7(f)	Absconders Status Affidavit: complete status of	For each of Zhu Wei, Liu Yang, Zhuang Wei, Wang Xin, and Chen Wei:	ED PMLA prosecution complaints: all five named.	Writ pp. 29–30 [Ground(f)], 37–38	2 weeks

Prayer Ref	Interim Prayer (from Writ)	Specific Questions State Must Answer	Evidence Already on Record	Writ Pages	Deadline Prayed
	each named Chinese accused	(i) date of Look Out Circular — before or after departure; (ii) current confirmed location as of March 2026; (iii) whether any formal extradition request was filed in any jurisdiction; (iv) whether any Interpol Red Corner Notice was successfully processed. For Wang Fang and 6 unnamed — the specific officer who decided on deportation without prosecution and written reasons.	LOC status: not on public record whether before/after departure. Interpol RCN applications: applied but confirmation status unknown. No successful extradition request traceable in any public record.	[Prayer 7(f)], 11–13 [Para 2.5]	

9.1 Additional Gaps — Main Prayers Requiring State Disclosure

Prayer Ref	Main Prayer (from Writ)	Specific Gap / State Must Disclose	Writ Pages	Evidence Corroborating Gap
6(a)	Data Recovery and Destruction Mandate	(i) Complete inventory of all known databases, server clusters, and data repositories outside Indian territory containing exfiltrated Indian citizen data. (ii) Whether any diplomatic Note Verbale has ever been issued to governments of China, UAE, or Cambodia regarding stolen Indian citizen data. (iii) Whether any MLAT request has been filed for data on servers in Singapore,	Writ pp. 30–31	CloudSEK/Group-IB: 80M+ records confirmed (Writ pp. 86–89). No diplomatic note in any public record. No MLAT request for data traced anywhere.

Prayer Ref	Main Prayer (from Writ)	Specific Gap / State Must Disclose	Writ Pages	Evidence Corroborating Gap
		UAE, or other MLAT-covered jurisdictions.		
6(b)	Extradition and LOC Accountability	(i) Complete status report on all LOCs, RCNs, and extradition proceedings for every Chinese national accused. (ii) Why formal extradition proceedings under Section 3(4) were not initiated.	Writ pp. 31	ED/CBI press releases: zero Chinese arrested (Writ pp. 82–85). Section 3(4): available since 1993 (Writ pp. 108–112).
6(c)	Court-Directed SIT — Data Pipeline Investigation	Whether SIT constitution has ever been considered; the scope of any existing forensic investigation of data pipeline vs. money flows; the quantum and current location of exfiltrated Indian citizen data.	Writ pp. 31–32	Operation Hawk press release: no data pipeline forensics (Writ pp. 82–85). 237th Committee: no data forensics infrastructure (Writ pp. 79–81).
6(d)	Arrest-by-Arrest Data Accountability Affidavit	For every arrest in Chinese loan app cases 2019–2026: (i) number of mobile devices seized; (ii) app permissions active on seized device; (iii) whether harvested data was forensically traced; (iv) whether any data recovery order was made.	Writ pp. 32	ED/CBI press releases list arrests but no device forensics data. Para 2.7.1 (Writ pp. 15–16): no data recovery order in any case.
6(f)	Full Government Accountability Report 2014–March 2026	(i) Every action taken 2014–2026 specifically directed at data protection in context of loan app and SDK surveillance. (ii) Specific action taken on petitioner's intelligence submissions (Annexures P-14, P-15) — name officer, date of receipt, action taken, reason if no	Writ pp. 33	PMO Grievance records (Writ pp. 96–101): acknowledged, no investigative action. Speed Post receipts (Writ pp. 96–101): proof of delivery confirmed.

Prayer Ref	Main Prayer (from Writ)	Specific Gap / State Must Disclose	Writ Pages	Evidence Corroborating Gap
		action. (iii) Every instance where extradition was considered.		
6(g)	DPDPA Operationalisation Under Court Supervision	(i) DPB constituted within 60 days. (ii) All implementing rules under DPDPA 2023 notified within 90 days. (iii) Breach notification issued to 80M affected citizens within 120 days.	Writ pp. 33–34	Official Gazette: Act enacted August 11, 2023 (Writ pp. 57–59). 31 months of non-operationalisation: mandatory 'shall constitute' language creates non-discretionary duty.

SECTION X — EVIDENCE STRENGTH ASSESSMENT: WHAT IS PROVED & WHAT MUST BE ORDERED

10. Evidence Fully Corroborated by Official Government Records

The following items of evidence are fully corroborated by official government sources that cannot be disputed by the respondents. Each is tagged with the specific official source and writ page citation.

#	Finding	Official Source	Writ Citation	Rating
1	Scale of cybercrime (2017–2025): 27,248 FIRs in 2018 growing to 2.3 million NCRP complaints in 2025	NCRB Crime in India 2022 & 2023; I4C Annual Reports 2022–2024; PIB October 2025	Writ pp. 74–78, 93–95	★★★★★
2	Digital arrest losses: Rs. 2,140 crore lost in 2024 alone; 105 calls per hour	MHA I4C Annual Report 2024; PM Modi Mann Ki Baat October 27, 2024; Parliamentary replies	Writ pp. 74–78, C	★★★★★
3	80 million+ KYC records on dark web traced to loan app/NBFC pipeline	CloudSEK (August 2021, 2022); Group-IB India 2022; Resecurity October 2023 (815M records)	Writ pp. 86–89	★★★★★
4	DPDPA 2023 non-operationalisation: Board not constituted, Rules not notified (31 months)	Official Gazette August 11, 2023; MeitY Parliamentary replies confirming no Board constitution	Writ pp. 57–59	★★★★★
5	Zero extradition requests against any Chinese national in any digital dacoity case	MEA Parliamentary replies; ED/CBI press releases; no extradition record in any public source	Writ pp. 108–112, E–F	★★★★★
6	Operation Hawk/Chakra-II: 103 arrests (all Indian nationals), zero Chinese arrested	Official ED Press Release April 2024; CBI Press Release Aug–Sep 2023	Writ pp. 82–85	★★★★★
7	I4C budget underspent 34% over 3 consecutive years	Parliamentary Standing Committee on Home Affairs — 237th Report	Writ pp. 79–81	★★★★★

#	Finding	Official Source	Writ Citation	Rating
		(2023) — Parliament's own finding		
8	Cybercrime conviction rate: 2.3% (NCRB); chargesheeting rate: 38%	NCRB Crime in India 2022 and 2023 (official government publication)	Writ pp. 93–95	★★★★★
9	InMobi FTC Consent Order (Case C-4530, June 2016): public record	FTC official website (ftc.gov); docket C-4530 — US government regulatory order	Writ pp. 60–63	★★★★★
10	Silverpush FTC Warning Letters (March 17, 2016): public record	FTC official website (ftc.gov); FTC press release March 17, 2016	Writ pp. 64–67	★★★★★
11	RBI Circular 2020 (RBI/2020-21/116): no data destruction direction issued	RBI official circular on rbi.org.in — official Reserve Bank publication	Writ pp. 68–70	★★★★★
12	RBI Digital Lending Guidelines 2022 (RBI/2022-23/111): no retrospective data provision	RBI official circular on rbi.org.in — official Reserve Bank publication	Writ pp. 71–73	★★★★★
13	MEA confirmation: 5,200+ Indians trafficked to SE Asia cyber fraud compounds, 3,100+ repatriated	MEA Parliamentary Reply, December 2024 (Lok Sabha/Rajya Sabha official records)	Writ pp. 90–92	★★★★★
14	Jeffrey Zhu LOC issued after departure from India: documented intelligence failure	ED PMLA prosecution complaints Delhi ZO; State FIRs; petitioner's representation records	Writ pp. 11–12, G	★★★★☆
15	Petitioner's government representations (2022–2025): acknowledged, zero investigative action	PMO Grievance numbers; MHA/MeitY Appeal records; Speed Post consignment numbers	Writ pp. 96–107	★★★★★
16	Section 3(4) Extradition Act text: available since December 18, 1993	indiacode.nic.in — official text of Extradition Act; Ministry of Law publication	Writ pp. 108–112	★★★★★

#	Finding	Official Source	Writ Citation	Rating
17	5 generations of same criminal operation: each reconstituting in 48–72 hours after enforcement	ED forensic analysis; CloudSEK APK analysis; I4C annual complaint trajectory	Writ pp. 13–14	★★★★★
18	7 Chinese nationals deported without criminal prosecution (2020–2021)	Telangana Police FIR 2020; Pune Cyber Cell FIR 2021; ED records	Writ pp. 12–13	★★★★☆

10.1 Evidence Gaps — Within Exclusive Government Knowledge

The following items cannot be established from public records alone — they require court-directed affidavit disclosure. The negative inference from non-disclosure is that the favourable fact does not exist (i.e., no extradition request was ever filed, no inquiry was ever opened).

#	Gap	Why State Has Exclusive Knowledge	Prayer Reference	Inference if Not Disclosed
G-1	Exact date Jeffrey Zhu's LOC was issued vs. date of his departure from India	ED/MHA operational files; LOC issuance records are internal government documents	Prayer 7(a); Writ pp. 36	LOC issued after departure = intelligence failure = constitutional omission
G-2	Whether any Section 3(4) invocation was ever considered, by whom, and the written decision	MEA/MHA internal files; Cabinet/NSC deliberations if any	Prayer 7(a); Writ pp. 36	Never considered = arbitrary omission of available statutory tool for 14 years
G-3	Whether any seized citizen data from Chinese loan app cases is in government custody	ED/CBI forensic custody records; PMLA attachment records	Prayer 7(b); Writ pp. 36–37	No data in custody = data pipeline never treated as forensic target
G-4	Root Cause Analysis underlying Mule AI Hunter / Telecom SOP / CNAP / 1930 helpline	MHA/I4C internal policy documents; SOP development records	Prayer 7(c); Writ pp. 37	No RCA addressing data layer = SOPs structurally

#	Gap	Why State Has Exclusive Knowledge	Prayer Reference	Inference if Not Disclosed
				incapable of solving root cause
G-5	Whether InMobi/Silverpush SDK contributed to real-time victim profiling in digital arrest	MHA/I4C investigation files; any technical forensics conducted	Prayer 7(d); Writ pp. 37	No investigation = adtech surveillance layer continues to operate undetected
G-6	File noting for MeitY on FTC InMobi Consent Order (June 2016) — was it ever reviewed?	MeitY internal files; CERT-In advisory records; any inter-ministerial communications	Prayer 7(e); Writ pp. 37	No file noting = deliberate or negligent ignoring of foreign regulatory finding for 8+ years
G-7	Status of any Interpol Red Corner Notice application for each named Chinese accused	CBI/Interpol NCB records; MEA liaison records	Prayer 7(f); Writ pp. 37–38	No successful RCN = international enforcement system has not been effectively used
G-8	Complete list of Indian consumer applications in which InMobi and Silverpush SDKs were embedded 2014–2026	MeitY would need to compel disclosure from InMobi/Silverpush under IT Act	Prayer 6(e); Writ pp. 32–33	Without this list, scale of surveillance cannot be assessed or remedied
G-9	Whether any MLAT request was filed for Indian citizen data held on servers in Singapore, UAE, Cambodia	MEA/MHA MLAT unit records	Prayer 6(a); Writ pp. 30–31	No MLAT request = data recovery avenue available and never used

#	Gap	Why State Has Exclusive Knowledge	Prayer Reference	Inference if Not Disclosed
G-10	Who received petitioner's intelligence submissions and what written decision was made on each	PMO, MHA, MeitY internal file notings; NCSC/NSA records	Prayer 6(f); Writ pp. 33, 96–107	No action record = three years of specific expert intelligence ignored without reason

SECTION XI — CONSOLIDATED EVIDENCE SUMMARY & COURT SUBMISSION FRAMEWORK

11. Master Evidence Summary for Court Submission

THE CENTRAL CONVERGENT FINDING OF THIS EVIDENCE PACK: Every major ground of Writ Petition WP (Criminal) 2026 — Nitish Kumar v. Union of India & Ors. — is corroborated by at least one, and in most cases multiple, official government sources. CAG reports, Parliamentary Standing Committee reports, NCRB statistics, MHA I4C data, ED/CBI official press releases, MEA parliamentary replies, FTC foreign regulatory orders, RBI circulars, and official Gazette notifications — together form an uncontested body of official record establishing the petitioner's claims. The central argument — State pursued money while ignoring data; prosecuted workers while Chinese architects escaped; enacted DPDPA 2023 without operationalising it; possessed Section 3(4) extradition tools for 14 years without using them — is documented, official, verifiable, and uncontested in the public record.

11.1 Evidence Chain: From Data Theft to Constitutional Tort

Chain Link	Fact Established	Official Source	Constitutional Significance	Writ Pages
Link 1: The Crime	3-layer architecture harvested 80M+ Indian citizens' complete biometric and identity profiles through Android apps, shell NBFC KYC funnels, and AdTech SDKs	ED forensic exhibits; CloudSEK APK analysis; FTC Consent Order (InMobi); FTC Warning Letters (Silverpush)	Art. 21 violation: informational privacy right (Puttaswamy 2017) violated at scale	Writ pp. 8–11 (Para 2.3)
Link 2: The Exfiltration	Aggregated data exported to Chinese servers (Alibaba Cloud/AWS Singapore) during 2019–2020 COVID lockdown by Jeffrey Zhu and co-accused. Peak: 80M+ records confirmed on dark web from mid-2021.	ED prosecution materials; CloudSEK 2021–22; Group-IB India 2022; Resecurity October 2023	Art. 21: data in foreign criminal hands = digital constitutional personhood of 80M citizens permanently in hostile foreign hands	Writ pp. 11, 86–89 (Annex P-11)
Link 3: The Weaponisation	Stolen data deployed for digital arrest (105	I4C Annual Report 2024; NCRB 2022–	Art. 21 right to life: deaths and torture caused	Writ pp. 23–24 (Ground c); pp. 74–

Chain Link	Fact Established	Official Source	Constitutional Significance	Writ Pages
	calls/hour), AI sextortion, mule account generation, Telegram investment fraud. Rs. 2,140 crore lost in 2024 from digital arrest alone. 83+ deaths by suicide.	23; Maharashtra Cyber Report 2023; Kerala Cyber Dome 2025; State FIRs	by weaponised data = continuing constitutional tort	78 (Annex P-8)
Link 4: The Principal Architect's Impunity	Jeffrey Zhu departed India before LOC. Never prosecuted in any jurisdiction. Holds master database of 80M records. Section 3(4) available since 2011 + UNCAC Article 44 since 2011 — never invoked.	ED PMLA complaints; MEA Parliamentary replies; ED press releases (zero Chinese arrests)	Art. 14: arbitrary impunity of principal architect while workers prosecuted = discrimination without rational basis	Writ pp. 11–12 (Para 2.5); pp. 108–112 (Annex P-16)
Link 5: The Investigative Mischaracterisation	State investigated money flows (Rs. 800+ crore attached); ignored data flows (zero data recovery orders). One wrong decision in 2020 — follow the money, not the data — made all subsequent harm irreversible.	ED/CBI press releases: zero data recovery; Operation Hawk: money only; RBI 2022: no retrospective data provision	Art. 14: arbitrary discrimination between money harm (pursued) and data harm (ignored); Art. 21: irreversible harm	Writ pp. C–D (Synopsis paras 8–9); pp. 15–16 (Para 2.7.1)
Link 6: The Regulatory Vacuum	DPDPA 2023 enacted August 11, 2023 but DPB not constituted, Rules not notified, breach notification never issued. InMobi/Silverpush: 8–10 years of inaction on FTC-documented violations.	Official Gazette (DPDPA); MeitY parliamentary replies; CAG Report 15/2022	Art. 21: Parliament's protection mandate wholly inoperative; Art. 14: arbitrary non-exercise of statutory power	Writ pp. 57–59 (Annex P-3); pp. 60–67 (Annex P-4 & P-5)

Chain Link	Fact Established	Official Source	Constitutional Significance	Writ Pages
Link 7: The Constitutional Tort	From 2019 to March 2026: not one of the following has been done: data recovery order, extradition request, forensic data investigation, DPB constitution, InMobi/Silverpush enforcement, response to petitioner's intelligence. 83+ deaths. Rs. 52,976 crore lost.	Aggregate of all official sources above; Petitioner's representation records (PMO grievance numbers)	Art. 21 + Art. 14 + Art. 32: continuing constitutional tort requiring Guardian jurisdiction of Supreme Court under basic structure doctrine (Kesavananda Bharati 1973)	Writ pp. 35 [Prayer 6(l)]; pp. B–H (Synopsis)

11.2 Novel Constitutional Questions Raised For First Time — No Precedent

The following three questions are raised for the first time in any Indian court and have not been adjudicated in SMW (Crl.) No. 3 of 2025 or any other pending matter. They must be considered independently before any question of tagging arises. **[Writ p. 126–130 (Clarification on Maintainability)]**

#	Novel Constitutional Question	Why Never Raised Before	Writ Pages	Significance for Future Cases
NQ-1	Whether the systematic destruction of digital constitutional personhood of 80 million citizens through permanent export of their complete biometric identity profiles to foreign criminal infrastructure violates the BASIC STRUCTURE of the Constitution under Article 21 as extended by Puttaswamy (2017)	No prior case involves (a) biometric data of 80M+ citizens; (b) in foreign criminal hands; (c) actively weaponised in real time; (d) with digital arrest as a recurring consequence. The combination is unprecedented.	Writ pp. B–D (Synopsis paras 2–4); pp. 34–35 (Art. 141 declaration prayer)	Will govern every digital rights case in the AI era. The declaration of Digital Constitutional Personhood under Article 141 will be precedent for 1.4 billion Indians.
NQ-2	Whether the State's five-year decision to investigate only the financial dimension while completely ignoring the data dimension constitutes a SINGLE INVESTIGATIVE MISCHARACTERISATION that converted a remediable	No court has examined the money-vs-data distinction in the same criminal ecosystem. SMW 3/2025 addresses financial	Writ pp. C–D (Synopsis paras 8–9); pp. 35 [Prayer 6(l)]	Establishes the doctrine of investigative mischaracterisation as a constitutional tort — applicable in all future cases where State

#	Novel Constitutional Question	Why Never Raised Before	Writ Pages	Significance for Future Cases
	harm into a permanent and irreversible constitutional injury — creating a continuing constitutional tort for which the Court as Constitutional Guardian must provide structural remedy	dimension only. The data dimension — 80M irreversible records — has never been placed before any court.		enforcement choices cause irreversible rather than remediable harm.
NQ-3	Whether India's 14-year failure to invoke Section 3(4) of the Extradition Act 1962 read with UNCAC Article 44 against any named Chinese principal architect of this ecosystem constitutes an ARBITRARY ABDICATION OF AVAILABLE LEGAL POWER that violates Article 14 and has allowed the master custodian of 80M Indian citizens' biometric records to remain permanently beyond legal reach	Section 3(4) has been in force since December 18, 1993. India ratified UNCAC in 2011. In 14 years, no court has been asked to direct the government to use Section 3(4) against any accused. The non-use of an available statutory tool is a novel constitutional question.	Writ pp. E–F (Synopsis paras 14–16); pp. 36 [Prayer 7(a)]	Will establish that the 'no extradition treaty' argument cannot be used by the State when Section 3(4) provides an alternative legal basis. Binding precedent for all future India-China cybercrime extradition requests.

11.3 Urgency Quantification — Official Data

Time Unit	Documented Harm (Official Data)	Official Source	Constitutional Significance	Writ Reference
Every Hour (24x7x365)	105 digital arrest calls; Rs. 8.5 crore coerced from victims	Derived from I4C 2024 annual total (920,000 digital arrest complaints / 8,760 hours)	105 Art. 21 violations per hour — each constitutes a separate psychological torture using stolen Aadhaar biometric data	Writ pp. 119–122 (Urgency IA); pp. C
Every Day	2,520 digital arrest calls; Rs. 204 crore coerced; estimated 1–2 self-harm incidents	I4C Annual Report 2024; NCRB death statistics in state FIRs	Daily accumulation of constitutional tort; every day without judicial intervention =	Writ pp. 119–122; pp. 5 (Para 1B(iv))

Time Unit	Documented Harm (Official Data)	Official Source	Constitutional Significance	Writ Reference
			204 crore more irreversible harm	
Every 48–72 Hours	New predatory app re-uploaded with identical architecture under new name (Generations 1–4)	Five-generation pattern analysis; ED forensic; CloudSEK	Demonstrates that app-level enforcement is structurally insufficient; structural court direction needed	Writ pp. 13–14 (Para 2.6)
Each Day DPB Not Constituted	80 million breach victims receive zero statutory protection under Parliament's DPDPA 2023 mandate	Official Gazette (Act enacted); MeitY (Board not constituted)	Parliament's protection mandate for 80M citizens wholly inoperative — mandamus compelled as constitutional necessity	Writ pp. 57–59 (Annex P-3); pp. 119–122
Each Day Jeffrey Zhu Is Free	Master database of 80M records: access and use unchallenged; Section 3(4) + UNCAC Art. 44 available for 14 years — never used	ED prosecution materials; MEA parliamentary replies (zero extradition)	Arbitrary omission of available legal tool against principal architect of largest data theft in Indian history — continuing Art. 14 violation	Writ pp. 11–12; pp. 108–112; pp. E–F

SECTION XII — MASTER SOURCE INDEX: ALL EVIDENCE WITH VERIFIABILITY REFERENCE

12. Master Source Index — All Evidence Used in This Report

Every source used in this evidence pack is listed below with its official URL or location, enabling independent verification. All sources are public domain official documents.

Ref	Document	Official URL / Source	Key Finding	Writ Annexure	Writ Pages
S-1	FTC Consent Order — InMobi Pte Ltd (Case C-4530)	ftc.gov/legal-library/browse/cases-proceedings/152-3116-inmobi	100M devices tracked covertly; USD 950,000 penalty; 20-year compliance	Annexure P-4	Writ pp. 60–63
S-2	FTC Warning Letters — Silverpush SDK Developers	ftc.gov/news-events/news/press-releases/2016/03/ftc-issues-warning-letters-app-developers-using-silverpush-code	Ultrasonic audio beacon SDK triggers microphone without disclosure	Annexure P-5	Writ pp. 64–67
S-3	RBI Circular RBI/2020-21/116	rbi.org.in/Scripts/NotificationUser.aspx?Id=12012	Acknowledges loan app contact/photo harvest harm; no data destruction order	Annexure P-6	Writ pp. 68–70
S-4	RBI Digital Lending Guidelines 2022 (RBI/2022-23/111)	rbi.org.in/Scripts/NotificationUser.aspx?Id=12382	Prospective regulation; no retrospective data provision	Annexure P-7	Writ pp. 71–73
S-5	MHA I4C Annual Cyber Crime Data Reports	cybercrime.gov.in; i4c.mha.gov.in; Parliamentary Q&A	Rs. 2,140 crore digital arrest losses 2024; 4.6M NCRP complaints;	Annexure P-8	Writ pp. 74–78

Ref	Document	Official URL / Source	Key Finding	Writ Annexure	Writ Pages
	2022–2024		2.3% conviction		
S-6	Parliamentary Standing Committee — 237th Report	loksabha.nic.in — Standing Committee Reports section	I4C budget underspent 34%; state police coordination gaps	Annexure P-9	Writ pp. 79–81
S-7	ED Press Releases — Operation Hawk (April 2024)	enforcementdirectorate.gov.in — Press Releases	60 arrests (all Indian); Rs. 800+ crore attached; zero Chinese arrested; zero data recovery	Annexure P-10	Writ pp. 82–85
S-8	CBI Press Releases — Operation Chakra-II (Aug–Sep 2023)	cbi.gov.in — Press Releases	43 arrests (all Indian); Rs. 415 crore; zero Chinese arrested; zero data recovery	Annexure P-10	Writ pp. 82–85
S-9	CloudSEK Threat Intelligence Reports (2021–2022)	cloudsek.com/blog (search: Indian KYC data dark web 2022)	80M+ Indian KYC records in dark web; price Rs. 500–2,000 per 1,000 records	Annexure P-11	Writ pp. 86–89
S-10	Group-IB India Hi-Tech Crime Trends Report 2022	group-ib.com/resources	Data pipeline traced to loan app/NBFC mechanism; forensic corroboration	Annexure P-11	Writ pp. 86–89
S-11	MEA Parliamentary Reply — Myanmar/SE Asia	loksabha.nic.in / rajyasabha.nic.in — Starred/Unstarred Questions (search: Myanmar cyber fraud)	5,200+ trafficked; 3,100+ repatriated; confirms transnational	Annexure P-12	Writ pp. 90–92

Ref	Document	Official URL / Source	Key Finding	Writ Annexure	Writ Pages
	Trafficking (Dec 2024)		cyber ecosystem		
S-12	NCRB Crime in India 2022 & 2023 — Cyber Crime Chapter	ncrb.gov.in — Publications — Crime in India Annual Reports	2.3% conviction rate; 38% chargesheeting rate; 78,940 pending cases	Annexure P-13	Writ pp. 93–95
S-13	Petitioner's PMO Grievance Records	PMO Portal: PMOPG/E/2025/0190679; PMOPG/E/2026/0027145; PMOPG/E/2026/0027165	Intelligence submitted; acknowledged; zero investigative action	Annexure P-14	Writ pp. 96–101
S-14	Petitioner's MHA/MeitY Appeal Records	MINHA/E/A/26/0000249; MINIT/E/A/26/0000185	Appeals rejected without evidence examination	Annexure P-14	Writ pp. 96–101
S-15	India Post Speed Post Records	Consignment Nos.: EP919337267IN, EP919337448IN, EP919337372IN, EP919337253IN	Proof of delivery to PMO, NSA, MHA, Supreme Court	Annexure P-14	Writ pp. 96–101
S-16	PMLA 2002 + Extradition Act 1962 (Section 3(4))	indiacode.nic.in — search: Prevention of Money Laundering Act 2002; Extradition Act 1962	PMLA: data as proceeds of crime; Extradition Act S.3(4): no treaty required	Annexure P-16	Writ pp. 108–112
S-17	Constitution of India — Articles 14, 19(1)(a),	indiacode.nic.in/handle/123456789/1362; legislative.gov.in	Fundamental rights framework; Court's Article 32 and 142 jurisdiction	Annexure P-1	Writ pp. 48–52

Ref	Document	Official URL / Source	Key Finding	Writ Annexure	Writ Pages
	21, 32, 142				
S-18	IT Act 2000 — Sections 43A, 66, 69, 69A, 72, 72A + SPDI Rules 2011	indiacode.nic.in; meity.gov.in/content/security-privacy-and-cyber-laws	Enforcement powers; data protection; blocking powers — all unused against InMobi/Silver push	Annexure P-2	Writ pp. 53–56
S-19	DPDPA 2023 — Official Gazette	gazette.india.gov.in; meity.gov.in/data-protection-framework	Board never constituted; Rules never notified; breach notification: ZERO	Annexure P-3	Writ pp. 57–59
S-20	CAG Report No. 15 of 2022 (MeitY Compliance Audit)	cag.gov.in (search: Report 15 of 2022)	No proactive enforcement on foreign regulatory findings; CERT-In gaps	[CAG Report — cited in grounds]	Writ pp. 24, 32–33
S-21	CAG Report No. 16 of 2023 (Union Government Finance & Comms)	cag.gov.in (search: Report 16 of 2023)	MeitY 2017–2022 operations; UIDAI AUA access gaps; Digital India without data protection	[CAG Report — cited in grounds]	Writ pp. 15–16
S-22	PIB Report — Curbing Cyber Frauds in Digital India (October 2025)	static.pib.gov.in	86%+ households connected; incidents 10.29 lakh (2022) to 22.68 lakh (2024); Rs. 782 crore	[External corroboration of I4C data]	Writ pp. 74–78 (related)

Ref	Document	Official URL / Source	Key Finding	Writ Annexure	Writ Pages
			budget 2025-26		
S-23	Resecurity HUMINT Report — 815 Million Indian Records (October 2023)	resecurity.com (public blog); Economic Times reporting	815 million Aadhaar/passport records offered for sale; 100,000+ verified via UIDAI portal	Annexure P-15	Writ pp. 102–107
S-24	PM Modi Mann Ki Baat — October 27, 2024 (Digital Arrest Reference)	pmindia.gov.in — Mann Ki Baat transcripts	India's highest office acknowledged 'digital arrest' as dangerous crime vector; cited Rs. 4.5 crore case from Gurugram	[Corroborating government source]	Writ pp. 76–77

SECTION XIII — PETITIONER STANDING, CREDENTIALS & ADMINISTRATIVE REMEDY EXHAUSTION

13. Petitioner's Standing and Exhaustion of Administrative Remedies

The writ petition establishes the petitioner's standing through: (a) National Cyber Security Scholar credentials; (b) direct victim status; (c) three years of formal intelligence submissions to six government bodies; and (d) complete exhaustion of administrative remedies. This section corroborates each element with specific writ citations. **[Writ p. 4–7 (Para 1B), 96–107 (Annexures P-14 & P-15)]**

13.1 Credentials — National Cyber Security Scholar

Credential	Significance to Writ	Writ Citation
National Cyber Security Scholar — NSD Program, Rashtriya Raksha University (Ministry of Home Affairs institution)	Establishes domain expertise. The petitioner's technical intelligence submissions are not 'general complaints' but specific, expert, named-and-sourced intelligence of a standard that government agencies could and should have acted upon.	Writ pp. 113–114 (Annexure P-17); pp. 1 (Listing Proforma); pp. 4 (Para 2.2)
Technology Consultant / AI Scholar — 32 years, National Cyber Security Scholar	Locus standi under S.P. Gupta v. UOI (1981): any public-spirited citizen. Additionally has standing as a direct victim who has documented the ecosystem from personal experience of cyber fraud.	Writ pp. 5 (Para 1A(i)); pp. 6–7 (Para 1B(ii)-(iii))
Direct Victim of Cyber Fraud Ecosystem	Petitioner states he is a 'direct victim of the ecosystem described herein' (Writ Para 1, p. 4). This provides personal standing independent of PIL locus.	Writ pp. 4 (Para 1 — 'direct victim'); pp. 7 (Para 1B(iii))

13.2 Government Representations — Complete Record of Submissions and Non-Response

Date	Authority	Mode / Reference No.	Intelligence Submitted	Response	Writ Pages
08.03.2024	Multiple authorities (NIA, PMO, ED, ISAC)	Email: 'Urgent Request for Action Against Cybercrime Operation'	Organized cybercrime via loan apps; ITES infrastructure; AWS hosting;	No response	Writ pp. 99 (Annex P-14 table)

Date	Authority	Mode / Reference No.	Intelligence Submitted	Response	Writ Pages
			financial channels misuse		
12.12.2025	Prime Minister's Office	PMO Portal: PMOPG/E/2025/0190679	AdTech surveillance; AI profiling; cyber exploitation; national integrity risk	Acknowledged; closed without investigation	Writ pp. 99
17.01.2026	Ministry of Home Affairs	Appeal Portal: MINHA/E/A/26/0000249	Appeal against MHA closure without evidence examination	Rejected	Writ pp. 99
16.02.2026	PMO / MeitY	PMO Portal: PMOPG/E/2026/0027145	Digital identity breach; absence of SOP for data recovery/destruction	Acknowledged; closed	Writ pp. 99
23.02.2026	MeitY	Appeal Portal: MINIT/E/A/26/0000185	Appeal on biometric compromise and systemic data breach	Rejected	Writ pp. 99
16.02.2026	MHA / I4C	PMO Portal: PMOPG/E/2026/0027165	Information security governance and digital dacoity (linked to SC matter)	Under process	Writ pp. 99–100
05.01.2026	PMO (Principal Secretary)	Speed Post: EP919337267IN	Cyber surveillance; systemic failure; national security concern	Not available — delivered	Writ pp. 100
05.01.2026	National Security Advisor	Speed Post: EP919337448IN	Internal cyber threat; AdTech surveillance; intelligence failure	Not available — delivered	Writ pp. 100

Date	Authority	Mode / Reference No.	Intelligence Submitted	Response	Writ Pages
05.01.2026	Ministry of Home Affairs	Speed Post: EP919337372IN	Information security governance failure	Not available — delivered	Writ pp. 100
05.01.2026	Supreme Court of India	Speed Post: EP919337253IN	Cybercrime and national security concerns	Not available — delivered	Writ pp. 100

ADMINISTRATIVE REMEDY: COMPLETELY EXHAUSTED Specific expert intelligence was submitted to MeitY, MHA/I4C, RBI, PMO, Supreme Court of India, and NCSC between 2022 and 2025. Every submission received standard acknowledgements or was closed without investigative action. Zero investigative action was triggered by any submission across any of the six government bodies. PMO Grievance reference numbers, MHA and MeitY Appeal reference numbers, and India Post consignment numbers constitute irrefutable proof of submission and delivery. The negative — the absence of any investigative response — is itself the constitutional omission that makes Article 32 jurisdiction available. Administrative remedy is demonstrably and completely exhausted.

13.3 Petitioner's Safety — Prayer for Protection

The writ petition (Prayer 6(k), Writ pp. 35; IA for Permission to Appear in Person, Writ pp. 115–118) seeks whistleblower-like protections for the petitioner, who has formally identified named foreign criminal operators and their data pipeline architecture. The legal basis cited includes: **[Writ p. 35, 115–118]**

- Mahender Chawla v. Union of India (2019) 14 SCC 615 — Witness Protection Scheme as enforceable law
- Bandhua Mukti Morcha v. Union of India (1984) 3 SCC 161 — Court's duty to protect persons assisting justice
- PUCL v. Union of India (1997) 1 SCC 301 — Protection of rights of persons approaching the Court in public interest
- Whistle Blowers Protection Act, 2014 — applicable by analogy to intelligence-submitting whistleblower-like citizens

SECTION XIV — LEGAL FRAMEWORK: CONSTITUTIONAL PROVISIONS, CASE LAW & STATUTORY BASIS

14. Legal Framework Supporting Each Relief

Relief Sought	Constitutional/Statutory Basis	Key Case Law	Writ Citation	Why This Relief Is Necessary
Declaration: Digital Constitutional Personhood as fundamental right under Art. 21	Articles 21, 141, 142	Puttaswamy (2017) 10 SCC 1 (PRIMARY); Kesavananda Bharati (1973) AIR 1973 SC 1461 (basic structure)	Writ pp. 34–35 [Prayer 6(l)]; pp. B–D [Synopsis]	Will govern all digital rights cases in AI era for 1.4 billion citizens. Only SC can issue this declaration under Art. 141.
Data Recovery and Destruction Mandate (Note Verbale, MLAT, court order against foreign servers)	Art. 21, Art. 142, PMLA S.8 (data as proceeds of crime)	Ram Jethmalani v. UOI (2011) 8 SCC 1 — State duty to recover national assets; Puttaswamy (2017)	Writ pp. 30–31 [Prayer 6(a)]	Ordinary mandamus cannot reach foreign servers. Only Art. 142 structural direction can order government to pursue data through diplomatic and legal channels.
Extradition Proceedings under Section 3(4) Extradition Act	Art. 14, Art. 21; Extradition Act 1962 S.3(4) as inserted by Act 66 of 1993; UNCAC Art. 44; UNTOC	Vineet Narain v. UOI (1998) 1 SCC 226 — Court-monitored investigation; Art. 14 (arbitrary omission of available tool)	Writ pp. 31 [Prayer 6(b)]; pp. 108–112 [Annex P-16]	Section 3(4) has been available since 1993 and India ratified UNCAC in 2011. Non-invocation for 14 years against

Relief Sought	Constitutional/Statutory Basis	Key Case Law	Writ Citation	Why This Relief Is Necessary
				documented Chinese architects is arbitrary under Art. 14.
Court-Directed SIT — Data Pipeline Investigation	Art. 32, Art. 142; BNS 2023 Sections 316–318	Vineet Narain (1998) — Court-monitored probe; M.C. Mehta Oleum Gas (1987) — enterprise liability	Writ pp. 31–32 [Prayer 6(c)]	No existing investigation has been directed at data pipeline as distinct forensic target. A court-directed SIT is the only mechanism capable of producing this investigation.
Mandamus — DPDPA Operationalisation (DPB within 60 days; Rules within 90 days)	DPDPA 2023 Sections 6, 8, 18, 33, 40; Art. 21; Art. 32	Vishaka v. State of Rajasthan (1997) 6 SCC 241 — Court's power to issue binding guidelines in regulatory vacuum; mandatory statutory language creates non-discretionary duty	Writ pp. 33–34 [Prayer 6(g)]; pp. 57–59 [Annex P-3]	'Shall constitute' is mandatory. 31 months of non-compliance is an unambiguous mandamus ground.
InMobi/Silverpush Enforcement Direction	Art. 14; IT Act 2000 S.43A; SPDI Rules 2011; DPDPA 2023 S.8	E.P. Royappa v. State of Tamil Nadu (1974) 4 SCC 3 — arbitrary non-exercise of statutory power = Art. 14 violation	Writ pp. 32–33 [Prayer 6(e)]; pp. 60–67 [Annex P-4 & P-5]	8 years of inaction on documented foreign regulatory findings against entities operating in

Relief Sought	Constitutional/Statutory Basis	Key Case Law	Writ Citation	Why This Relief Is Necessary
				India is arbitrary. No rational explanation possible.
Full Government Accountability Report 2014–March 2026	Art. 32 (enforcement jurisdiction); Art. 142; S.P. Gupta v. UOI (1981) — right to know	Vineet Narain (1998) — continuing mandamus and accountability; Bandhua Mukti Morcha (1984)	Writ pp. 33 [Prayer 6(f)]	Establishes what the government actually did vs. what it should have done. Without this report, the court cannot assess the constitutional omissions.
Petitioner Protection — Whistleblower-like Security	Art. 21 (Maneka Gandhi 1978 — right to life includes right to personal security); Whistle Blowers Protection Act 2014	Mahender Chawla v. UOI (2019) 14 SCC 615; PUCL v. UOI (1997)	Writ pp. 35 [Prayer 6(k)]; pp. 115–118	Petitioner has identified named foreign criminal operators in public filings. His personal safety is a constitutional concern the court must address.

CLOSING STATEMENT — THIS EVIDENCE PACK: This report establishes, from official government sources alone, that: (1) 80 million+ Indian citizens' biometric identities were stolen and remain on criminal servers — CONFIRMED by CloudSEK, Group-IB, Resecurity, and government-notified threat intelligence; (2) The state pursued money and ignored data — CONFIRMED by Operation Hawk and Chakra-II press releases (zero data recovery in any operation); (3) Not one Chinese principal architect faced extradition — CONFIRMED by MEA parliamentary replies and ED/CBI press releases; (4) DPDPA 2023 is 31 months un operationalised — CONFIRMED by Official Gazette and MeitY parliamentary replies; (5) Section 3(4) was available for 14 years and never used — CONFIRMED by the text of the Extradition Act and the absence of any extradition request in any public record. The State cannot credibly contest any of these five propositions. The petitioner asks this Court to do what

five years of administrative action has not done: follow the data, extradite the architects, and declare the digital constitutional personhood of Indian citizens as a protected fundamental right in the AI era.

END OF EVIDENCE PACK | WP (Criminal) No. _____ of 2026

Compiled: April 2026 | 14 Sections | All Sources Publicly Verifiable | *No legal opinion is expressed herein*