New Delhi

27th July, 2016

To,

The Station House Officer,

Police Station – Prahlad Pur

New Delhi

Sir,

**Sub: Criminal Complaint against Mr. Kadir Ahmad (Accused No. 1), Ms. Razia (Accused No. 2), Md. Asif (Accused No. 3) and Md. Aqeel (Accused No. 4) all residing in A-77, Chungi No. 2, Lal Kuan, New Delhi – 110062 for committing offences punishable under Sections 498A, 354, 354A, 354B, 355, 509 and 120B of the Indian Penal Code, 1860 and such other offence(s) as may be made out.**

1. I, Tazrun Nisha, w/o Kadir Ahmed, reside at 26/64, Saidulajab, New Delhi – 110030 am constrained to file the present complaint on the following facts.
2. I, who originally hail from Assam, was married to Md. Mahmood Khan, 25 years ago and settled with him in Meerut. He passed away in 2002. Thereafter, I was married to Mr. Kadir Ahmed, resident of A-77, Chungi No. 2, Lal Kuan, New Delhi – 110062 on 18th May 2015. Fifteen days after the marriage, my husband brought me to Delhi and started living at his house in Lal Kuan.
3. Before my marriage with him, Kadir Ahmed told me that his wife had passed away and that he had no children. Further, he also told me that apart from the house in Lal Kuan, he had plots of land in Faridabad and Saket and that they are lying unused and that there is nobody to take care of them. He told me that if he could marry he then he could lead a peaceful life. Influenced by such inducements, I thought that since I was also living alone, if I marry Kadir Ahmed, I could also lead a peaceful life. Thus, based on these inducements, I agreed to marry him.
4. After fifteen days of marriage, when he brought me from Meerut to Lal Kuan, New Delhi, to my utter surprise, I came to know that Kadir Ahmed did not live alone. He lived with his children from the first wife – his three sons, Ladeem, Shaqeel and Kafeel and his daughter Razia. Apart from the aforesaid persons, in his house lived Ladeem’s wife, Razia’s husband Md. Asif as well as his younger brother and my brother-in-law, Md. Akeel. But since I am a helpless and indigent woman, I was left with no other choice. So I chose to stay.
5. For the first three to four months, I lived peacefully with the rest of the residents of the house. But somehow Kadir Ahmed’s sons and his daughter Razia came to know that Kadir had promised to transfer about 40 square yards of land in my name. Seeing me an impediment in the ways of the otherwise larger shares of property that they would have inherited from their father post his death, they decided to torture me so that I decide to leave the house.
6. Thereafter, I was gradually subjected to a streak of inhuman treatments. It began with me being compelled to do all the household work alone. At first, I tried, but for reasons of my age, I could not endure this after a certain time. When I tried to tell my husband and the rest of the aforesaid family members of the house that I could not do such amount of work, Kadir Ahmed along with the three aforementioned Accused persons beat me up. Apart from this, Accused No. 2 Razia also threatened to throw me out of the house and told me that if I could not do all the household chores for them, I was of no use to them and must ultimately leave the house.
7. I tried to reason with the Accused persons. I told Razia that I will do my share of the work and will not be a burden on the rest of them and they can do their own shares of chores. But this was of no avail. I was treated like a maid in the house and was compelled to do all the household chores all alone. I was beaten for not being able to work even when I fell ill occasionally. They not only hurled at me kicks and punches me but also beat me with *lathis.* Nobody, including the other members of the house would try to stop them. I was beaten to the extent that I incurred major injuries to my arms and the rest of the body and nobody ever bothered to have me checked up with a doctor.
8. Situation only worsened for me in due time. Apart from beating me and asking me to leave the house regularly and hurling endless abuses, they now subjected me to new means of torturing. My brother-in-law would come to the house drunk almost every night. On one such night, he grabbed me by my arms and tried to pull me inside his room. When I reported this to Kadir, he told me that it is okay and that I should not make a fuss of such things. He told me ‘what was the big deal’ if Kadir, who is his younger brother tried to have a little ‘fun’ with me.
9. On the 9th of March 2016, I was getting undressed to take a bath when Md. Arif, Razia’s husband barged into the bathroom, which is at a distance from the main residential structure. Exasperated and annoyed, when I asked him to get out of the bathroom, he asked me to take it easy and ‘enjoy’ with him and tried to forcibly pull off my clothes. I somehow managed to escape and run out of the bathroom. Since Razia, who was clearly aware of her husband’s wrongdoings, did not do anything about it, I was scared. I understood that I was not safe inside the house and her husband could do anything to me. So I chose not to stay in the house for long and after putting on a maxi, I ran out of the house immediately.
10. Thereafter, I dialed 100 from a telephone near a temple in that area. The policeman on the line asked me to accept some money and settle it with my husband and the Accused persons. Although the police came after a little while, they merely told me that this will not be repeated. They did not listen to me at all, doing nothing except scolding my family members a little.
11. A few hours later, my husband came to me and convinced me to go home with him. After arguing with him initially, expecting all will to be fine now, I agreed to go with him.
12. On the night of 10th March 2016, at about 1:30 A.M., I was on the roof of the house when to my utter shock and dismay, I heard Razia telling Kadir Ahmed, Asif and Akeel that they must join hands in killing me. She told them that instead of using *lathis* on me they should beat me with kicks and punches so that there is no proof of violence and after that, they should hang me from the ceiling to make it look like a suicide. She also suggested them to dial 100 and call the police themselves after getting rid of me. After a while, I also saw that ropes were brought for the purpose of hanging me.
13. I realized my life was in danger. I could not sleep the entire night and kept walking to and fro. As soon as I got a chance in the morning, I tried to run away from the house. But the Accused persons caught hold of me and wouldn’t let go. They started beating me ruthlessly with *lathis* and everything they could get their hands on. When I started yelling and screaming, an old woman in the neighborhood came and asked them why they were beating me so mercilessly. This distracted them and I managed to escape.
14. The Accused persons have as such sought to subject me to regular cruelty and injure me grievously. Further, the Accused No. 3 and 4 have tried to outrage my modesty by using criminal force upon me intending to outrage my modesty. Further, Accused No. 3 and 4 have also sexually harassed me by making physical contact with me and advancing sexual overtures towards me. Further, they have tried to dishonor me using criminal force. Further Accused No. 3 has also tried to insult my modesty by asking me to ‘take it easy and enjoy’ his acts which were clearly and insulting and outrageous to my modesty. Further, they have tried to induce fear and intimidate me on a regular basis. Further, all the Accused persons have also conspired to commit the offence of killing me.
15. The conduct, acts and omissions of the Accused persons are as such malicious from the very beginning. The Accused persons have regularly intimidated me, hurled abuses and have inflicted grievous physical injuries on me. Apart from a major injury on my arm, I have also received injuries in many other parts of my body. Such acts on part of the Accused prima facie constitute the requisite intention and the requisite *actus reus* for, inter alia, the offence of subjecting me to cruelty punishable under section 498A of the Indian Penal Code, 1860 **(“IPC”).**
16. Subsequently, Accused No. 4 grabbed my arm and tried to pull me inside his room with intentions to outrage my modesty. On 9th March, Accused No. 3 barged into the bathroom where I was about to take a bath and tried to compel me to be naked, made physical contact with me, and asked me to take it easy and ‘enjoy’ with him. These acts on part of the aforesaid Accused persons constitute the requisite intention and the requisite *actus reus* for, inter alia, the offences punishable under section 354, section 354A, section 354B, section 355 and section 509 of the Indian Penal Code, 1860 **(“IPC”).**
17. The Accused persons also conspired to kill me by hanging me with a rope from the ceiling of the house and make it look like a suicide. They also brought ropes to seek their ends. These acts on part of the Accused persons clearly constitute the requisite intention and the requisite *actus reus* for, inter alia, the offence of Criminal conspiracy punishable under section 120B of the Indian Penal Code, 1860 **(“IPC”).**
18. Hence, from the facts mentioned hereinabove, it is prima facie evident that the Accused persons have committed acts which constitute the offences punishable under section 498A, section 354, section 354A, section 354B, section 355, section 509 and section 120B of the Indian Penal Code, 1860 which need to be investigated and the guilty deserve to be punished.

You are therefore requested to:

* 1. Register an FIR and investigate into the matter in order to bring the culprit(s) to book;
  2. Ensure the safety of my person and property which are under threat from the Accused persons.

I would be ready and willing at all times to assist in any way possible with the investigation.

Thanking you,

Yours faithfully,

(Tazrun Nisha)

26/64, Saidulajab,

New Delhi – 110030