

1 IN THE SOUTHERN DIVISION OF THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA,
3 FIRST DIVISION.

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5 At a stated term of said Court begun and holden
6 at the City and County of San Francisco, within and for the
7 Southern Division of the Northern District of California on
8 the First Monday of March in the year of our Lord One thou-
9 and nine hundred and seventeen,

10 The Grand Jurors of the United States of America,
11 within and for the Division and District aforesaid, on their
12 oaths present: T H A T
13 FRANK BOPP, ECKHART H. von SCHACK, WILLIAM VON BRINCKEN,
14 CHARLES LATENDORFF, WALTHER SAUERBECK, EDWIN DEIMAT,
15 HEINRICH ELBO, HENRY KAUFMANN, JOHN F. CRAIG, H. MARTINEZ,
16 RAY HOWARD, J. CLYDE HIZAR, JOSEPH L. BLEY, FRED JEBSEN,
17 JUAN BERNARDO BOWEN, WALTER H. PAGE, HANS TAUSCHKE, WALTER
18 C. HUGHES, MARIE LEONHAUSER, SOLOMON C. LEONHAUSER, JEAN
19 FISHER, F. VON PAFEN, C. HOPENBURG, ROBERT CAPELLE, HARRY
20 J. HART, JOHN B. STARR-HUNT, MORITZ STACK VON GOITZHEIM,
21 JOHN DOE BRITZMAN, whose true Christian name is to the
22 Grand Jurors aforesaid, unknown, GEORGE ROEDER, H. R. SCHROEDER,
23 LOUIS T. HENGSTLER, RALPH RUSS, CAPTAIN P. E. SCHLUTER,
24 ERNEST SE KUNKA, WOLF VON IGEL, HAROLD A. CHEN (Chinese),
25 DOUGES DEKKER, THEODORE HELFFERICH, EMIL HELFFERICH, JACK
26 SLOAN, LEOPOLD MICHAELS, HAR DAYAL, RAM CHANDRA, BHAGWAN
27 SINGH, AJIT SINGH, GURU DUTT KUMAR, VIRENDRANATH
28 CHATTOPADHYAYA, MOHAMED BARKATULLAH, DR. JOHN DOE PRABHAKAR,
29 DR. ABDUL HAFIZ, CHEMPAKARAM PILLAI, BHUPENDRA NATH DUTT,
30 RISHI KESH, KEDAR NATH SONNHI, AMIN CHAND SHARMA, SHIV
31 DEV SINGH, KARTAR RAM, M. P. FIRUMAL ACHARYA, TARAKNATH
32 DAS, HARISH CHANDRA, LADLI PRASAD VARMA, SANTOSH SINGH,

1 GORAL SINGH, SRINIVAS R. WAGEL, JOSEPH SINGH, SUDHAKAR CHATTERJI,
 2 SHIV DYAL KAPUR, TEHL SINGH, HARI SINGH (1), MANGU RAM,
 3 HARNAM CHAND, GAMBHIR SINGH, HAR CHARAN DAS, HARENDRA
 4 BHATTARCHARJYA, alias Mahendra Nath Roy, KUMOD NATH
 5 MUKHARJI, SAILENDRA NATH GHOSE, DARISI CHENCHIAH, RAM
 6 SINGH, KRIPENDRA CHATTERJI, HARAJAN DAS, MAHADEO ABAJI
 7 HANDEKAR, JHANENDRA NATH SANYAL, DHIRENDRA NATH SEN,
 8 RASH BEHARI BOSE, alias P. N. Thakur, KESHO RAM SABARWAL,
 9 GOUDA RAM, SUNDAR SINGH GHALLI, MUHSI RAM, HIDEAH SINGH,
 10 BISHAM SINGH HINDI, IMAM DIN, GOBIND BEHARI LAL, SURENDRA
 11 NATH KAR, HARI SINGH (2), CHANDRA KANTA CHAKRAVARTY,
 12 DHIRENDRA NATH SARKAR, and HARAMBA LAL GUPTA, herein-
 13 after called the defendants, heretofore, to wit, on or
 14 about the first day of August in the year of our Lord One
 15 thousand nine hundred and fourteen, at San Francisco, in
 16 the Southern Division of the Northern District of Cali-
 17 fornia, did knowingly and feloniously conspire and agree
 18 together and with Kurt von Reiswitz, Gustav E. Jacobsen,
 19 Albert E. Wehde, George Paul Boehm, John Doe Scholtz,
 20 alias Sterneek, whose true Christian name is to the Grand
 21 Jurors aforesaid, unknown, Alfred Zimmerman, and Hans
 22 Christian Nelson, or Neilson, (now deceased), and with
 23 divers other persons whose names are to the Grand Jurors
 24 aforesaid, unknown, to commit a certain offense against
 25 the United States, to wit, to knowingly, wilfully and
 26 feloniously begin and set on foot and provide and prepare
 27 the means for a military enterprise to be carried on from
 28 within the territory of the United States against India,
 29 which was, during all the said times, the territory and
 30 dominions of the King of the United Kingdom of Great
 31 Britain and Ireland and of the British Dominions beyond the
 32 Seas, and Emperor of India, a foreign prince with whom the

1 United States throughout all the times mentioned in this
2 indictment, was at peace, and with whom the Emperor of
3 Germany was, during all such times, at war, the end, the
4 object and the purpose of the said enterprise being to
5 incite mutiny and armed rebellion in India, by the native
6 subjects of the said King of the United Kingdom of Great
7 Britain and Ireland and of the British Dominions beyond
8 the Seas, and Emperor of India, against his government and
9 authority there; and to overthrow and destroy the said
10 government and authority; and to hinder and obstruct the
11 military operations of the said King of the United Kingdom
12 of Great Britain and Ireland and of the British Dominions
13 beyond the Seas, and Emperor of India, against the said
14 Emperor of Germany, and to aid and assist the military
15 operations of the said Emperor of Germany in the said war
16 with the King of the United Kingdom of Great Britain and
17 Ireland and of the British Dominions beyond the Seas, and
18 Emperor of India, all of which the said defendants and the
19 said other persons with whom they did conspire, each and
20 all, well knew; that is to say, that the United States
21 were, during all the times mentioned in this indictment,
22 at peace with the King of the United Kingdom of Great
23 Britain and Ireland and of the British Dominions beyond
24 the Seas, and Emperor of India, and that, during all the
25 said times, the Emperor of Germany was at war with the
26 said King of the United Kingdom of Great Britain and
27 Ireland and of the British Dominions beyond the Seas, and
28 Emperor of India; that they, the said defendants, did
29 knowingly and feloniously conspire and agree together
30 and with the persons above mentioned as aforesaid, to
31 procure men within the United States, to give them military
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1 training, and training in the use of explosives there,
2 to furnish them with arms, ammunition, supplies and money
3 in the United States, a large proportion of which money
4 should be money belonging to the Imperial German Empire,
5 to furnish them with transportation from the United
6 States to India upon various steamships sailing from the
7 United States, to send them from the United States to
8 India, to go themselves from the United States to India,
9 to send from the United States to India seditious
10 literature designed and intended to incite rebellion
11 there, and to purchase and to charter vessels within the
12 United States, with funds to be supplied in part by
13 representatives of the Imperial German Empire within the
14 United States, and to transport and ship from the United
15 States to India upon the said vessels so purchased and char-
16 tered within the United States, some of the aforesaid men,
17 money and munitions, all with the intention on the part of
18 each and every of said defendants and said persons with whom
19 they did conspire, that they and the said persons so trained,
20 furnished, supplied, and transported to India as afore-
21 said, should incite the native subjects of the said King
22 of the United Kingdom of Great Britain and Ireland and
23 of the British Dominions beyond the Seas, and Emperor of
24 India, in India, to mutiny and rebel against the establish-
25 ed government and authority of the said King there, to
26 engage in such mutiny, rebellion and revolution themselves,
27 to provide military training for, to furnish men, arms,
28 munitions and money for the use of the said native subjects
29 of India in carrying on such a rebellion; and with the
30 further intention then and thereby to render military
31 assistance to the said Emperor of Germany by engaging in
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1 warfare, and causing to be thus engaged, in India, large
2 numbers of troops of the said King of the United Kingdom
3 of Great Britain and Ireland and the British Dominions
4 beyond the Seas, and Emperor of India, and to hinder and
5 obstruct the military operations of the said King of the
6 United Kingdom of Great Britain and Ireland and of the
7 British Dominions beyond the Seas, and Emperor of India,
8 by rendering it necessary for the said King, in order to
9 put down and keep down such rebellion and mutiny in India,
10 and in attempting so to do, to station and retain in
11 India large bodies of his troops which would otherwise be
12 available for duty in other parts of the world to fight
13 against the military forces of the Emperor of Germany
14 aforesaid, all of which said defendants well knew.

15 That the said conspiracy and agreement between
16 the said defendants and the said other persons was con-
17 tinually, throughout all the time from and after the
18 said first day of August in the year of our Lord One
19 thousand nine hundred and fourteen, and at all the times
20 herein mentioned, and particularly at the time of the
21 commission of each and all of the overt acts in this
22 indictment set forth, in existence and in course of
23 execution.

24 And the Grand Jurors aforesaid, on their oaths
25 aforesaid, do further present, that in furtherance of said
26 conspiracy and agreement, and to effect and accomplish the
27 object thereof, the said defendants RAM CHANDRA, BHAGWAN
28 SINGH, and MOHAMED BARKATULLAH did, at San Francisco,
29 in the Southern Division of the Northern District of
30 California, and within the jurisdiction of this court,
31 cause Jawalla Singh, Keshar Singh, Jagat Ram, and many
32 others whose names are to the Grand Jurors aforesaid,

1 unknown, to sail from San Francisco on the Steamship
2 "Korea" on the 29th day of August, 1914, bound for India.
3 And the Grand Jurors aforesaid, on their oaths
4 aforesaid, do further present, that in furtherance of
5 said conspiracy and agreement, and to effect and accomplish
6 the object thereof, the said defendant RAM CHANDRA did, at
7 San Francisco, in the Southern Division of the Northern
8 District of California, on the ---- day of February, 1915,
9 send one Rikhi Kesh, alias Zeaudin, to Germany, from
10 San Francisco, California, on the 10th day of April
11 1915. And the Grand Jurors aforesaid, on their oaths
12 aforesaid, do further present, that in furtherance of
13 said conspiracy and agreement, and to effect and accom-
14 plish the object thereof, the said defendant RAM CHANDRA
15 did, at San Francisco, in the Southern Division of the
16 Northern District of California, on or about the ---
17 day of February, 1915, send Amin Chand Sharma, Shib Dev
18 Singh, Kedarnath, and Kartar Ram, from San Francisco to
19 Germany. And the Grand Jurors aforesaid, on their oaths
20 aforesaid, do further present, that in furtherance of
21 said conspiracy and agreement, and to effect and accom-
22 plish the object thereof, the said defendant JOHN SINGH
23 did, at San Francisco, in the Southern Division of the
24 Northern District of California, on the 22nd day of May
25 1915, take passage on the Steamship "Tenyo Maru", for
26 Manila, Division of the Northern District of California.
27 And the Grand Jurors aforesaid, on their oaths
28 aforesaid, do further present, that in furtherance of
29 said conspiracy and agreement, and to effect and accom-
30 plish the object thereof, the said defendant JOHN F. CRAIG
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1 did, at San Francisco, in the Southern Division of the
2 Northern District of California, on the 16th day of March,
3 1915, purchase the Steamship "Maverick" from the Standard
4 Oil Company.

5 And the Grand Jurors aforesaid, on their oaths
6 aforesaid, do further present, that in furtherance of
7 said conspiracy and agreement, and to effect and accom-
8 plish the object thereof, the said defendant RAM CHANDRA
9 did, at San Francisco, in the Southern Division of the
10 Northern District of California, on the 10th day of April
11 1915, send Hari Singh, Ghambir Singh, Mangu Ram, Har Charan
12 Das, and Harnam Chand, from San Francisco to Los Angeles,
13 California.

14 And the Grand Jurors aforesaid, on their oaths
15 aforesaid, do further present, that in furtherance of
16 said conspiracy and agreement, and to effect and accom-
17 plish the object thereof, the said defendant HARAMBA LAL
18 GUPTA did, on the 25th day of August, 1915, at San Fran-
19 cisco, in the Southern Division of the Northern District
20 of California, sail on the Steamship "Mongolia" for Japan.

21 And the Grand Jurors aforesaid, on their oaths
22 aforesaid, do further present that in furtherance of
23 said conspiracy and agreement, and to effect and accom-
24 plish the object thereof, the said defendant J. CLYDE
25 HIXAR did, on or about the 29th day of January, 1916,
26 procure and cause J. H. Rinder, at San Francisco, in the
27 Southern Division of the Northern District of California,
28 to charter the Schooner "Annie Larsen" from Olsen &
29 Mahony.

30 And the Grand Jurors aforesaid, on their oaths
31 aforesaid, do further present, that in furtherance of
32 said conspiracy and agreement, and to effect and accom-
plish the object thereof, the said defendant HAN CHUN, at San
Francisco, in the Southern Division of the Northern
District of California, on the 25th day of June, 1915,

1 And the Grand Jurors aforesaid, on their oaths
2 aforesaid, do further present that in furtherance of
3 said conspiracy and agreement, and to effect and accom-
4 plish the object thereof, the said defendant FRED JERSEN
5 left San Francisco in the Southern Division of the Northern
6 District of California on the 24th day of March, 1915, and
7 went to Los Angeles, California.

8 And the Grand Jurors aforesaid, on their oaths
9 aforesaid, do further present that in furtherance of
10 said conspiracy and agreement, and to effect and accom-
11 plish the object thereof, the said defendant JOSEPH L. BLEY
12 did, at San Francisco, in the Southern Division of the North-
13 ern District of California, on the 5th day of April 1915,
14 send and cause to be sent to Long Beach, California, the
15 following telegram:

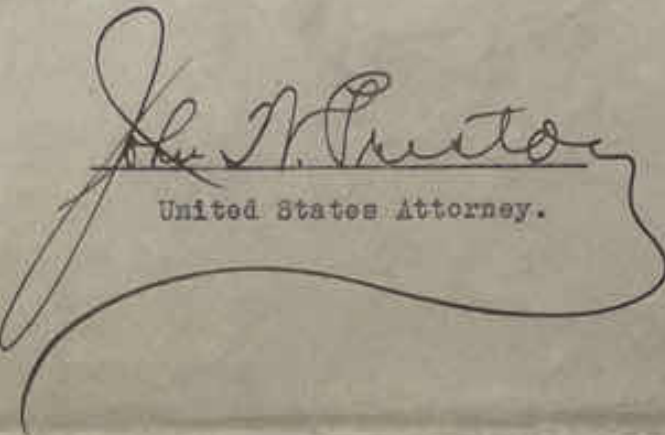
16 Capt. H. C. Nelson,
17 Leaving tonight Owl. Will come to Long
18 Beach before noon. (Signed) Ross.

19 And the Grand Jurors aforesaid, on their oaths
20 aforesaid, do further present that in furtherance of
21 said conspiracy and agreement, and to effect and accomplish
22 the object thereof, the said defendant RAM CHANDRA, at San
23 Francisco, in the Southern Division of the Northern District
24 of California, on June 10th 1915, caused Three hundred
25 dollars (\$300.00) to be transmitted by Postal Telegraph-Cable
26 Company to J. Amar Singh, Manila.

27 And the Grand Jurors aforesaid, on their oaths
28 aforesaid, do further present that in furtherance of
29 said conspiracy and agreement, and to effect and accomplish
30 the object thereof, the said defendant RAM CHANDRA, at San
31 Francisco, in the Southern Division of the Northern
32 District of California, on the 23rd day of June, 1915,

1 transmitted Three hundred dollars (\$300.00) by Postal
2 Telegraph-Cable Company to H. Chatterji, 720 Wright St.,
3 ^t
Katale, Manila.

4 AGAINST the peace and dignity of the United
5 States of America, and contrary to the form of the statute
6 of the said United States of America in such case made and
7 provided.

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United States Attorney.
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