

1 UNITED STATES OF AMERICA,  
2 Northern District of California, SS:  
3 City and County of San Francisco.

4 Before me, Francis Krull, a United States Com-  
5 missioner for the Northern District of California at San  
6 Francisco, personally appeared this day Don S. Rathbun,  
7 who being first duly sworn deposes and says: That on or  
8 about August August 20th, 1914,

9 RAM CHANDRA, GODHARAM/NARANJNA DAS, SUNDAL SINGH  
10 GALLIE, PHAGWAN SINGH, SANTOKH SINGH, GOPAL SINGH, GAMBIR  
11 SINGH, hereinafter called the defendants, did unlawfully,  
12 knowingly, wilfully and feloniously, in violation of  
13 section 37 of the Criminal Code of the United States,  
14 conspire, combine, confederate and agree together,  
15 with, between and among themselves, and with diverse other  
16 persons to deponent unknown, to commit the acts made offenses  
17 and crimes by the laws of the United States, to wit, section  
18 23 of the Criminal Code of the United States, that is to  
19 say: The said defendants did, at the time aforesaid,  
20 knowingly, wilfully, unlawfully and feloniously conspire  
21 combine, confederate and agree together, with, between and  
22 among themselves and diverse other persons to deponent  
23 unknown, to knowingly, wilfully, unlawfully and feloniously  
24 begin and set on foot and provide and prepare the means,  
25 as will more fully appear hereinafter, for a certain military  
26 enterprise hereinafter described, to be carried on from  
27 within the territory and jurisdiction of the United States,  
28 against the territory and dominions of the King of Great  
29 Britain and Ireland, and Emperor of India, a foreign  
30 prince with whom the United States then were, ever since  
31 have been, and now are at peace, to wit, against British  
India which was then and there the territory and the

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1 dominions of the said King of Great Britain and Ireland, and  
2 Emperor of India;

3 That at all the times herein mentioned the Emperor  
4 of Germany was at war with the King of Great Britain and  
5 Ireland and Emperor of India, as each of the defendants  
6 then and there well knew;

7 That the purpose and object of the said military  
8 enterprise and the aim, purpose and intent of the said  
9 defendants were the crippling, hindering and obstructing  
10 of the military operations of the King of Great Britain and  
11 Ireland and Emperor of India, and the furthering, aiding,  
12 and assisting the military operations of the Emperor of  
13 Germany in said war between said King of Great Britain and  
14 Ireland and Emperor of India and said Emperor of Germany,  
15 in and by the means and methods hereinafter set forth and  
16 described, and in and by other means and methods to  
17 deponent unknown: That is to say, the intention of the  
18 said defendants, and the design, the end, the aim and  
19 the purpose of the said military enterprise was to procure  
20 and organize men within the territory and dominions of the  
21 United States of America, and the Northern District of the  
22 State of California, and equip them with arms and  
23 ammunition, and transport them to the territory and dominion  
24 of the King of Great Britain and Ireland and Emperor of  
25 India, to wit, British India, there to engage in an  
26 armed revolt against the government of the said King of  
27 Great Britain and Ireland and Emperor of India, to wit,  
28 the government of India, for the purpose of overthrowing  
29 and destroying the said government; the intention of the  
30 said defendants, and the design, the end, the aim and the  
31 purpose of the said military enterprise was also to aid



1 Germany in her military operations against Great Britain  
2 and Ireland, by forcing Great Britain and Ireland to with-  
3 draw troops from military operations in Europe, and send  
4 them to British India, there to suppress the revolt above  
5 mentioned.

6 That said conspiracy, combination, confederation  
7 and agreement between the said defendants and the said  
8 diverse other persons whose names are as aforesaid, to  
9 deponent unknown, was continuously throughout all of the  
10 time from and after the said 20th day of August 1914, and  
11 at all of the times in this complaint mentioned and  
12 referred to, and particularly at the time of the commission  
13 of each and all of the overt acts in this complaint herein-  
14 after set forth, in existence and process of execution.

15 And deponent aforesaid, on his oath aforesaid,  
16 doth further state that in furtherance of said conspiracy,  
17 combination, confederation and agreement, and to effect  
18 and accomplish the object thereof, the said defendants, on  
19 April 23rd 1915, caused the steamer "HAVERICK" to be  
20 cleared from San Pedro, California;

21 And deponent aforesaid, on his oath aforesaid,  
22 doth further state that in furtherance of said conspiracy,  
23 combination, confederation and agreement, and to effect  
24 and accomplish the object thereof, the said defendants on  
25 January 19th 1915, caused the steamer "ANNIE LARSON" to be  
26 chartered by the firm of M. Martinez & Co.

27 And deponent aforesaid, on his oath aforesaid,  
28 doth further state that in furtherance of said conspiracy,  
29 combination, confederation and agreement, and to effect  
30 and accomplish the object thereof, the said defendants on  
31 March 8th 1915, caused certain arms and ammunitions to

1 be placed on the steamer "ANNIE LARSON" at San Diego,  
2 California.

3 And deponent aforesaid, on his oath aforesaid,  
4 doth further state that in furtherance of said conspiracy,  
5 combination, confederation and agreement, and to effect  
6 and accomplish the object thereof, the said defendant  
7 Ram Chandra, on or about April 22nd, 1915, caused the  
8 following named Indians to sail from Los Angeles, Califor-  
9 nia, on the steamer "MAVERICK": Hari Singh, Harman Dat,  
10 Rakham Ram, and two other Indians whose names are to deponent  
11 unknown.

12 AGAINST the peace and dignity of the United  
13 States of America, and contrary to the form of the statute  
14 of the said United States of America in such case made and  
15 provided.

16  
17 *Don L. Rathbun*

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19  
20 Subscribed and sworn to before me  
21 this 7th day of April 1917.

22 *Frank Thull*  
23 U. S. Commissioner, as aforesaid.