



1. Dist. Darjeeling P.S. Matigara Year 2025 FIR No. 271/25 Date 26.4.2025
 2. Act BN 35 Sections 316(2)/318(4) Sections
 iii) Act Sections iv) Others Acts & Sections

3. (a) Occurrence of offence : Day Date From In the year 2022 Date To
 Time Period Time From Time To

(b) Information received at P.S. Date On 26.4.2025 Time 12:55 hrs

(c) General Diary Reference : Entry No (s) 1427 Time 12:55 hrs

4. Type of Information Written Written / Oral

5. Place of Occurrence : (a) Direction and Distance from P.S. About 04 km West from PS

(b) Address LR Plot No. 74, Mouza Baromohansing
PS. Matigara, Dist. Darjeeling

(c) In case outside limit of this Police Station, then the

Name of the P.S. District

6. Complainant / Informant :

(a) Name Tanuj Saraf

(b) Father's / Husband's Name s/o Vishnu Saraf

(c) Date / Year of Birth (d) Nationality

(e) Passport No. Date of Issue : Place of Issue

(f) Occupation

(g) Address Rajshree Apartment, Flat No-304, Prenami Mandir,
Road, Ward No-40 PS. Bhaktinagar, Dist. Jalpaiguri.

7. Details of known / suspected / unknown accused with full particulars

(Attach separate sheet, if necessary) :

① Phalay Ghosh s/o Lt Madan Ghosh of Durga Mandir,
 Champabari, ② Sujata Ghosh w/o Phalay Ghosh ③
 Kalpana Banerjee, ④ Pinaki Banerjee.

8. Reasons for delay in reporting by the Complainant / Information

9. Particulars of properties stolen / involved (Attach separate sheet, if necessary) :

10. Total value of properties stolen / involved

11. Inquest Report / U.D. Case No. If any

12. FIR Contents (Attach separate sheets, if required) : Original written complaint which is
trusted as FIR is enclosed herewith.

13. Action Taken : Since the above report reveals commission of offence(s) as mentioned at item No. 2., Registered and took up the
 investigation / directed 26.04.25
SI. Jayanta Das Inspector in Charge

investigation / refused investigation / transferred to P.S. Matigara Police Station to take up

jurisdiction. FIR read over to the Complaint / Informant, admitted to be correctly recorded and a copy given to the Complainant /

informant free of cost.

14. Signature / Thumb impression
 of the Complainant / Informant

15. Date & Time of despatch to the court :

Signature of the Officer in Charge Station

Name : ARINDAM BHAUDHARIE

Rank : No. Inspector in Charge

Matigara PS / SP

To,
The Officer-in-Charge
Matigara Police Station
District - Darjeeling

Date:

Sub: Written Complaint

Respected Sir,

I, **SRI TANUJ SARAF**, Son of Vishnu Saraf, Hindu by Religion, Indian by Nationality, Business by Occupation, resident of Rajshree Apartment, Flat No. 304, Pranami Mandir Road, Ward No. 40, P.O. Sevoke Road, P.S. Bhaktinagar, Dist. Jalpaiguri, Pin- 734001, would like to lodge a complaint stating as follows:

1. That I am the constituted attorney of my father Vishnu Saraf and my wife Ankita Saraf.
2. That one Pralay Ghosh S/o Lt. Madan Ghosh, resident of Durga Mandir, Champasari, approached my father Vishnu Saraf to sell land measuring 8.25 Decimals morefully described in the schedule below for a valuable consideration amount and thereafter being interested in his offer, my father along with my wife decided to purchased/the below scheduled land which the said Pralay Ghosh had purchased vide Deed of Conveyance being document No. 6915 for the year 2022 registered at the office of Additional District Sub-Registrar Siliguri-II at Bagdogra.
3. That Pralay Ghosh during the discussions and deliberations had specifically communicated the fact that the property sought to be sold was under mortgage of ICICI bank for a loan amount of approx Rs. 39,50,000/- and stated that the buyers (i.e. Vishnu Saraf and Ankita Rajgaria) to help him repay the loan from the total consideration amount and thereafter he would transfer the property to them and said that we can pay the remaining amount of the consideration through a post dated cheque.
4. That my father Vishnu Saraf and my wife Ankita Rajgaria being interested in the property repaid the loan amount of ICICI bank as communicated by Pralay Ghosh and thereafter Pralay Ghosh transferred all that piece and parcel of land measuring 8.25 Decimals or 5 Kathas appertaining to and forming part of R.S. Plot No. 26 and 27 corresponding to L.R.

*Received on 26.4.25 at 12:55 hrs vide
G.D.F. No. 1427 and started Matigara P.S. Case No.
271/25 Dtd- 26.4.25 up. 316(2)/318(4) of BMS
SI Jayanta Das will investigate the case*

[Signature]
Inspector-in-Charge
Matigara Police Station
Siliguri Police Commissionerate

Plot No. 74 recorded in L.R. Khatian No. 14517 of Mouza-Baromohansingh, under Matigara P.S., District

-Darjeeling by virtue of a registered Deed of Conveyance executed by said Pralay Ghosh being Document No. 9020 for the year 2024 registered at the office of Additional District Sub- Registrar Siliguri-II at Bagdogra.

5. That thereafter the land was mutated with the B.L. & L.R.O. Matigara and an L.R. Khatian being L.R. Khatian No. 15092 & 15096 were issued in their name.
6. That on 30/01/2025 we got the information that a Possession Notice of Bank of Baroda has been placed on the entrance gate of the land, with the averments that a Loan amount of Rs. 83,69,322.97/- plus and the unpaid interest is due and unpaid to the bank.
7. That after doing necessary inquiry at the bank it came to our know that this property has been mortgaged along with another adjacent property and the borrower of the said loan is none other than a proprietorship firm namely M/S Madan Enterprise whose Proprietor is Mr Pralay Ghosh.
The document that has been provided in the bank for the land is document No. 9262 for the year 2023 in the name Sujata Ghatraj W/o Pralay Ghosh.
8. That on searching it came to our knowledge that a power of Attorney has been executed by Kanchan Lal in favour Pralay Ghosh and on the strength of the said Power Pralay Ghosh has registered a deed of conveyance in favour of his wife Vide Document No. 9262 for the year 2022.
9. That the land details and boundary mentioned in both the deeds being Deed No. 9262 for the year 2023 and 6915 for the year 2022 is same and as such it can be ascertained that he have cheated the Bank officials as well. That Pralay Ghosh and his wife Sujata Ghatraj has concealed this entire facts and had hatched a plot to cheat and fraud not only my father and wife but also the banks.
10. That Pralay Ghosh has obtained a loan from the ICICI Bank in his favour vide deed No. 6915/2022 and obtained another loan on the same land from Bank of Baroda in his wife's name.

11. That recently one Kalpana Banerjee, her husband Pinaki Banerjee along with few others anti-social element have accumulated building materials in front of the land and have illegally enter into the land with an intention to construct pillar on the below schedule land.
12. That we also got the information from the local residents that Kalpana Banejee and her husband is an associate of Pralay Ghosh and now after receiving a hefty sum of money from us they have hatched a plan to take physical possession of the below schedule land and oust us from the land. That Pralay, his wife Sujata Ghatraj, Pinaki Banerjee and Kalpana Banerjee has planned to extort money from us and deprive us from enjoying the peaceful possession of our land.
13. That thereafter we confronted the said Pralay Ghosh and he stated that he would return my entire consideration amount along with the expenses incurred by me and an interest on the said amount and he also reimbursed an amount of Rs. 5,00,000/- (Rupees Five Lakhs) however thereafter he denied to pay any amount and instead he started threatening us that he shall take forceful possession of the land in association with Kalpana Banerjee. He is also threatening us with life and have also stated that if we take any legal action against them they would not fear to shed blood.
14. That it is very clear from the prevailing circumstances that Pralay Ghosh has committed fraud and act of cheating by inducing my father and wife to purchase the below scheduled property by stating that only one loan was pending against the property whereas from the information communicated by the bank it is clear that another loan has been taken by his firm and is still unpaid against the same property and also Pralay Ghosh has executed the Deed of Conveyance in favour of his wife with an intention to cheat by making false averments in the Deed that the property is free from any charge whatsoever.
15. Therefore, in the prevailing circumstances I request you take immediate and necessary action against Pralay Ghosh, Sujata Ghatraj, Kalpana Banerjee, Pinaki Banerjee and their associates, and stop them from taking forceful possession of the land.

SCHEDULE

All that piece and parcel of the land measuring approximately 8.25 Decimals or 5 Kathas appertaining to and forming part of R.S Plot No. 26, 27 and 28 corresponding to L.R. Plot No. 74 recorded in L.R. Khatian No. 15092 & 15096 of Mouza-Baromohansingh, under Matigara P.S. District –Darjeeling.

Thanking You,


TANUJ SARAF

Ph: 90933-71467

1. Copy of Document No. 9020 for the year 2024 registered at the office of Additional District Sub-Registrar Siliguri-II at Bagdogra.
2. Copy of Document No. 6915 for the year 2022 registered at the office of Additional District Sub-Registrar Siliguri-II at Bagdogra.
3. Copy of L.R. Khatian No. 15092 & 15096
4. Possession Notice of Bank of Baroda.