

FIRST INFORMATION REPORT

(Under Section 154 Cr. P.C.)



2276

1. Dis. Bhaktinagar Year 2025 FIR No. 419/25 Date 09.05.2025
 2. i) Act 316(2)/318(4)/61(D)/365 Sections 316(2)/318(4)/61(D)/365 ii) Act 316(2)/318(4)/61(D)/365 Sections 316(2)/318(4)/61(D)/365
 iii) Act 316(2)/318(4)/61(D)/365 Sections 316(2)/318(4)/61(D)/365 iv) Others Acts & Sections 316(2)/318(4)/61(D)/365

3. (a) Occurrence of offence : Day - Date From 2024 Date To 27.02.2025
 Time Period - Time From - Time To -

(b) Information received at P.S. Date 09-05-2025 Time 2010hrs.

(c) General Diary Reference : Entry No (s) 456/25 Time 2010 hrs.

4. Type of Information Written Written / Oral

5. Place of Occurrence : (a) Direction and Distance from P.S. - Beat No. -

(b) Address Balaji Enterprize, near Tiranga More, besides Seroko Motors, Sarkarpara, WPN-41, B-Bhaktinagar, Dist. Jalpaiguri.

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

Name of the P.S. - District -

6. Complainant / Informant :

(a) Name Ayush Garg

(b) Father's / Husband's Name Mr. Ashok Kumar Agarwal

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

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

(f) Occupation Proprietor of Balaji Enterprize.

(g) Address Near Tiranga More, besides Seroko Motors, Sarkarpara, WPN-41, B-Bhaktinagar, Dist. Jalpaiguri.

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

(Attach separate sheet, if necessary) : ① Mr. Saikat Chakraborty (Regional Sales Manager, Servotech 806, 8th floor, Crown Heights, Hotel, Union Plaza, Rohini, Sector 10, New Delhi - 110085) ② Mr. Kulbir Singh (Vice President Channel Sales, Servotech) ③ Mr. Ankur Khan delwal (Proprietor of Ak Sales Corporation 38, N.S. Road, Greenfield, Room No-10, Kolkata - 700001).

8. Reasons for delay in reporting by the Complainant / Information ④ Mr. Baskar (Manager of Ak Sales Corporation).

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) : The original written complaint which is treated as FIR is attached herewith.

13. Action Taken : Since the above report reveals commission of offence(s) as mentioned at item No. 2., Registered the case and took up the investigation / directed SI-Pintu Ghosh to take up investigation / refused investigation / transferred to P.S. Bhaktinagar P.S. on point of jurisdiction. FIR read over to the Complainant / 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 upon the written complaint.

Inspector in Charge
 Bhaktinagar Police Station
 Signature of the Officer-in-Charge, Police Station
 Name SHRI-AMIT ADHIKARY
 Rank : No. IPC-BHAKTINAGAR P.S.

15. Date & Time of despatch to the court :

~~Date: 28.04.2025~~

DA 9/5/2025

To

Inspector of Police,
Bhaktinagar Police Station,
Post : Siliguri-734001
Dist : Jalpaiguri

Email: bhaktinagarpsspc@gmail.com; bhaktinagarpolicestation@gmail.com
Ph: 0353-2543665

Subject: Complaint against Servotech Power Systems Ltd., AK Sales Corporation, and their Representatives for Criminal Conspiracy, Cheating, Criminal Breach of Trust, and Criminal Misappropriation of Funds and Request for Registration of an FIR.

Complaint Against:

1. Mr. Saikat Chakraborty
Regional Sales Manager, Servotech
806, 8th Floor, Crown Heights, Hotel Crowne Plaza,
Rohini Sector 10, New Delhi – 110085
92055 54757
rm@servotechindia.com
2. Mr. Kulbir Singh
Vice President Channel Sales, Servotech
806, 8th Floor, Crown Heights, Hotel Crowne Plaza,
Rohini Sector 10, New Delhi – 110085
79860 78862
channelsales@servotechindia.com
3. Mr. Ankur Khandelwal
Proprietor of AK Sales Corporation
38, N.S. Road, Ground Floor, Room No. 10, Kolkata – 700001
98303 25000
aksc2000@gmail.com
4. Mr. Bhaskar
Manager of AK Sales Corporation
38, N.S. Road, Ground Floor, Room No. 10, Kolkata – 700001
74394 72768
aksc2000@gmail.com

Respected Sir,

I beg to state the following:

1. I, Ayush Garg S/o Mr. Ashok Kumar Agarwal, Proprietor of Balaji Enterprises, Near Tiranga More, Lane beside Sevoke Motors, Sarkarpara, Sevoke Road, Siliguri-734001, Ward no. 41, PS Bhaktinagar, respectfully submit this written complaint against Mr. Saikat Chakraborty (Regional Sales Manager, Servotech Power Systems Ltd.), Mr. Kulbir Singh (Vice President, Channel Sales, Servotech Power Systems Ltd.), Mr. Ankur Khandelwal (Proprietor, AK Sales Corporation), Mr Bhaskar, Sales Manager of AK Sales Corporation and AK Sales Corporation itself, for committing serious offences of cheating, criminal breach of trust, criminal misappropriation of funds, and criminal conspiracy, thereby causing me wrongful financial loss, mental agony, and disruption of my legitimate business activities.
2. It is to state that in the year 2024, representatives of Servotech Power Systems Ltd., namely Mr. Saikat Chakraborty and Mr. Kulbir Singh, along with their authorized distributor M/s AK Sales Corporation through its proprietor Mr. Ankur Khandelwal, approached me offering a 'dealership opportunity'. They made several categorical assurances both in writing and through verbal communications. It was specifically promised that upon payment of an advance, Servotech would provide a dedicated sales representative for my region, active marketing support including participation in exhibitions, shop branding, and supply of product samples to facilitate business development. Entrusting these assurances, I agreed to move forward with the dealership arrangement.
3. Pursuant to these promises, it was agreed that two cheques would be issued in favour of AK Sales Corporation towards an advance payment against future supply of materials. However, it was an express condition, confirmed **in writing**, that the second cheque would only be encashed after the appointment of the regional sales representative. It was also clearly understood between the parties that this advance was not a security deposit and the amount was only an advance towards future material purchase. Acting in good faith and trusting the representations made by the accused persons, I handed over the two cheques as per their demand.
4. However, much to my shock and dismay, AK Sales Corporation, in blatant breach of trust and without fulfilling his part of the obligation, unlawfully encashed both cheques without any intimation or consent. This unlawful encashment, without adhering to the agreement, amounts to unauthorized misappropriation of my funds and a grave breach of fiduciary responsibility. Thereafter, despite my repeated demands and reminders for either fulfilment of promises or refund of the advance, they consistently resorted to delay and only gave false assurances.

5. In particular, I made written requests for refund through emails dated 18/12/2025 and 25/12/2025. In response, Mr. Saikat Chakraborty even acknowledged the lapse in an email dated 30/12/2025 and again promised to resolve the matter soon. However, despite multiple follow-up communications on several occasions, no refund or adherence to the obligation has been done. Instead, on 27/02/2025, Mr. Saikat conveyed that Mr. Ankur Khandelwal would "liquidate stock" to arrange the refund, which is not only violation of the agreed terms but also in continuation of their evil designs. The advance paid was never linked to stock clearance, and this excuse further exposes their dishonest and malicious intentions.
6. It is clear that from the very beginning, the accused persons acted in a coordinated manner to dishonestly induce me to part with my money on false assurances, with no real intention of fulfilling their promises. They had never been willing to adhere to the lawful means and further have been camouflaging to ensure a unlawful end with illegal means. Their subsequent conduct shows a deliberate and well-thought-out conspiracy to misappropriate my funds under the guise of a dealership agreement. Their acts constitute serious criminal offences, and have resulted in wrongful financial loss to me while allowing them to unlawfully enrich themselves at my expense.
7. In light of the above facts and circumstances, the accused persons are clearly liable for being charged under Section 406 IPC (corresponding to Section 316(2) of the Bharatiya Nyaya Sanhita, 2023) for criminal breach of trust; Section 420 IPC (corresponding to Sections 318(4) of the BNS) for cheating and dishonestly inducing delivery of property; Section 120B IPC (corresponding to Section 61(2) of the BNS) for criminal conspiracy; and Section 34 IPC (corresponding to Section 3(5) of the BNS) for acts committed in furtherance of common intention.
8. Accordingly, I most humbly request you to immediately register an FIR under Sections 316(2); 318(4); 61(2) and 3(5) against all the aforementioned individuals and the companies involved. I further request you to initiate a thorough investigation into the matter and take all necessary steps to secure recovery my advance amount. I am ready and willing to provide all documentary evidence, email correspondences, bank statements, and other relevant material in support of my allegations to assist in the investigation.
9. I sincerely hope that in view of the gravity of the offences committed and the clear breach of trust and fraudulent conduct displayed by the accused persons, your esteemed public office will act swiftly and firmly to ensure that justice is done.
10. I humbly urge to act upon the afore mentioned incident on an urgent basis.

Yours Faithfull,

Ayush Garg
Ayush Garg

(M) - 9434012548

Received on 09.05.2025 at 10:10 AM V. de
GDE NO - 456/25 dt:- 09.05.2025 and
start Bhaktinagar RS Case NO - 419/25
dt:- 09.05.25 U/S 316(2)/318(4)/61(2)/3(4)
of BNS. 23 and moved to SI-Pinku Chhabra
for investigation.

Inspector-in-Charge
Bhaktinagar Police Station
Gurgaon Police Commissionerate