

175 BNS 3  
200  
Darjeeling P.S. Bagdogra Year 2025 FIR No. 294/25 Date 07.08.25  
2. i) Act. BNS Sections 318(2)/318(4) ii) Act. Sections  
iii) Act. Sections iv) Others Acts & Sections.  
3. (a) Occurrence of offence : Day Date From Since long Date To  
Time Period Time From Time To  
(b) Information received at P.S. Date 07.08.25 Time 13:20 hrs  
(c) General Diary Reference : Entry No (s) 305 Time 13:20 hrs  
Written  
4. Type of Information Written / Oral  
5. Place of Occurrence : (a) Direction and Distance from P.S. 08 km South Beat No.  
(b) Address Moved Dulurichhat, P.S- Bagdogra Dist- Darjeeling

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

Name of the P.S. District

6. Complainant / Informant :

(a) Name Mary Margaret Chacko (9232 631093)  
(b) Father's / Husband's Name Sri Debarshi Roy  
(c) Date / Year of Birth (d) Nationality  
(e) Passport No. Date of Issue : Place of Issue  
(f) Occupation Hamra Dulurichhat P.S- Bagdogra, Dist- Darjeeling  
(g) Address

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

(Attach separate sheet, if necessary) :

① Mr Sebastian Chacko @ Chako Sebastian S/o- Lt K.T Chako of Hamra, Dulurichhat, P.S- Bagdogra, Dist- Darjeeling.  
② Mr Suraj Lepcha & others.

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 Nil

12. FIR Contents (Attach separate sheets, if required) : The original written complaint which is treated as FIR is reproduced over leaf. 07/08/2025

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 Gautam Laskar of Bagdogra P.S. to take up investigation / refused investigation / transferred to 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.

on the original  
Written complaint

14. Signature / Thumb impression  
of the Complainant / Informant

Signature of the Officer-in-Charge, Police Station

Name SI Partha Samthi Das

OK Bagdogra P.S.



4/8/2025

Received on 07.08.25, at 13:20 hrs vide GDE  
No 305, dated BDR P.S. case NO 294/25, Dt  
07.08.25 U/S 318(2)/318(4) BNS, endorsed to  
SI Gautam Laskar for its investigation.

To  
The Officer-in-Charge  
Bagdogra Police Station  
P.S. Bagdogra, District: Darjeeling  
West Bengal

Subject: Request for Registration of FIR

07/08/2025  
Officer-in-charge  
Bagdogra P.S. - 2  
Siliguri Metropolitan Police

Respected Sir,

I, Smt. Mary Margaret Chacko, daughter of Late K.T. Chacko and wife of Sri Debarshi Roy, resident of Hansqua, Dulurchhat, P.O. Now Bagdogra, P.S. Phansidewa (now Bagdogra), District Darjeeling, do hereby lodge the following complaint for your kind consideration and immediate legal action:

1. That my late father, Kathirlankal Teressamma Chacko @ K.T. Chacko, was the lawful owner of a substantial quantity of land measuring 2.89 acres situated in Mouza Dulurchhat, recorded under L.R. Khatian No. 10, P.S. Phansidewa (now Bagdogra), across several L.R. Plot numbers.
2. That my father passed away on 01/10/2000, leaving behind the following three legal heirs:
  - o His wife, Smt. Teresa Soren Chacko
  - o His son, Mr. Sebastian Chacko
  - o Myself, Smt. Mary Margaret Chacko (daughter)
3. That in the year 2012, due to financial hardship, all three legal heirs, including myself, jointly executed a sale deed transferring 28 decimals of land in L.R. Plot Nos. 122 and 123, under the said Khatian, to two individuals — Mr. Surinder Chowdhury and Mr. Suresh Chowdhury — vide Deed No. 2260 of 2012,
4. That the said deed was drafted, read over, and explained by Sri Joydeep Chakraborty, Ld Advocate of Siliguri Bar Association (Enrolment No. F-378/2003), who had apparently had knowledge of our family composition and ownership of ancestral land.
5. That from the year 2012 onwards, my mother suffered from serious neurological ailments and was frequently hospitalized, including treatment at Anandaloke Hospital, rendering her mentally unfit to comprehend legal transactions.
6. That I have been residing with my husband at Salbari, P.S. Pradhan Nagar, and during my absence from the ancestral residence, my brother Mr. Sebastian Chacko, taking undue advantage of our mother's medical condition, fraudulently caused the execution and registration of two gift deeds in his sole favour:
  - o Deed No. 5897 of 2018, for 128.5 decimals of land at Mouza Dulurchhat
  - o Deed No. 3729 of 2019, for 64 decimals of land under the same mouza

7. Upon examination of these deeds, I was shocked to find that They falsely state that the only legal heirs of my deceased father were my mother and my brother, deliberately excluding my name as a rightful legal heir.
8. That my mother passed away in 2019. Following her death, I began seeking information from my brother regarding the remaining properties of my deceased parents and any proposed partition. However, he repeatedly avoided my inquiries.
9. Upon independent inquiry, I discovered the above-mentioned deceitful acts and fraudulent transfer of land, evidently carried out by Mr. Sebastian Chacko, apparently in collusion with others.
10. It is also pertinent to mention that:
  - My mother belonged to a Scheduled Tribe (ST) community.
  - My father was not a member of any Scheduled Tribe.
  - Therefore, land inherited by my mother from her husband is to be treated as tribal land.
  - As per land transfer laws applicable to Scheduled Tribe communities, prior written permission of the competent authority is mandatory before such land can be transferred to a non-tribal.
  - No such permission was ever obtained, rendering the said transactions illegal and void in the eyes of law.
11. Furthermore, on 25/11/2014, a legal heir certificate was issued by the custodian of HetmuriSinghijhora Gram Panchayat, listing only my mother and brother as the only legal heirs of my father — a false and misleading document that was evidently used to facilitate the illegal transfer of property.
12. It is also a matter of serious concern that the then Additional District Sub-Registrar (ADSR), Mr. Suraj Lepcha, a Gazetted Officer, registered both the aforementioned deeds despite the absence of legal permission, and in apparent violation of Scheduled Tribe land protection laws.
13. From the totality of the above facts, it is evident that my brother Mr. Sebastian Chacko, in criminal conspiracy with others, committed these offences.

In view of the above, I respectfully request you to register an FIR against Mr. Sebastian Chacko, and any other persons found complicit in these illegal acts, and initiate a detailed investigation into the fraudulent land transfers under the specific provisions of law.

Yours faithfully,

*Mary Margaret Chacko*  
Smt. Mary Margaret Chacko 7/8/2025

[9232631093]

25/11/2014 6/4/2019 2025 30/1/20 01-08-22