



# FIRST INFORMATION REPORT

(Under Section 154 Cr. P.C.)

Dist. Darjeeling P.S. Matigara Year 2025 FIR No. 615/25 Date 19.09.2025  
2. i) Act BNS Sections (316(2)/318(4)) / 351(2)/324(2) / 350(3)/61(2)/303(2)

iii) Act ..... Sections ..... iv) Others Acts & Sections .....

3. (a) Occurrence of offence : Day ..... Date From 22.07.25 Date To 16.9.25

Time Period ..... Time From ..... Time To .....

(b) Information received at P.S. Date 01.10.2025 Time 20:05 hrs

(c) General Diary Reference : Entry No (s) 833 Time 20:05 hrs

4. Type of Information Written Written / Oral .....

5. Place of Occurrence : (a) Direction and Distance from P.S. About 06 km North East from P.S.

(b) Address LR Plot No- 309/310/560/334/49/58/331/332/48/333/561/59. J.L NO- 24, Mouza Rajpouri, P.S. Matigara,

(c) In case outside limit of this Police Station, then the Name of the P.S. .... District .....

6. Complainant / Informant :

(a) Name Sandeep Goyal

(b) Father's / Husband's Name S/o Bhagwan Goyal

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

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

(f) Occupation Director Sandeep G Real Estate Ltd.

(g) Address G- 0214, City Centre, Office Block, Uttarakon, P.S. Matigara,

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

(Attach separate sheet, if necessary) :

① Bimal Roy @ Bimal Chandro Roy s/o Lt Chhik Mohan Roy ② Smt. Dayanti Roy w/o Bimal Roy ③ Smt. Rama Baiho @ Rama Shailya w/o Prem Baiho All of Chhote Dhokuria, P.S. Matigara, Darjeeling

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 treated as FIR is enclosed 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 S.I. Ramanath Kanjia Inspector-in-Charge Matigara Police Station 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. 19.09.25

14. Signature / Thumb impression of the Complainant / Informant

15. Date & Time of despatch to the court :

Signature of the Officer-in-Charge Police Station  
Name ARINDAM CHATTERJEE  
Rank : No. Inspector in Charge  
Matigara P.S./SPC.



Date: 17<sup>th</sup> of September 2025.

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

*Received on 19.9.25 at 20:25 hrs vide GDE  
No. 833 and started Matigara PS Case No. 615/25  
Date 19.9.25 u/s 316(2)/318(4)/351(2)/324(2)/  
329(3)/61(2)/303(2) of BNS. 131 Ramanath  
rajee will investigate the case.*

Inspector-in-Charge  
Matigara Police Station

19.09.25

SUBJECT: COMPLAINT SEEKING REGISTRATION OF FIR AGAINST SRI BIMAL ROY & ORS. FOR OFFENCES UNDER SECTIONS 45,190,191(2),191(3),303(2),305(a-e),316(2),316(5),318(4),328,329(3),61(2),356(2),351(2) of BNS.

#### Particulars of the Complainant

- Name: Sri Sandeep Goyal
- Father's Name: Sri Bhagwan Goyal
- Designation: Director, Sandeep G Real Estate Ltd. (a public limited company incorporated under the Companies Act, 1956).
- Office Address: G-0214, City Centre Office Block, Uttorayon, Matigara, District Darjeeling – 734010.

#### Particulars of the Accused

1. **Sri Bimal Roy @ Bimal Chandra Roy** (S/o Late Chhir Mohan Roy), Resident of Choto Dhukuria, Patharghata, P.O. New Chamta, P.S. Matigara, District Darjeeling.
  2. **Smt. Dayanti Roy** (W/o Sri Bimal Roy), Resident of Choto Dhukuria, Patharghata, P.S. Matigara, District Darjeeling.
  3. **Smt. Roma Saibo @ Rama Shaibya** (W/o Sri Prem Saibo, D/o Late Muklal Roy), Resident of Choto Dhukuria, Patharghata, P.S. Matigara, District Darjeeling.
- And their associates, agents and conspirators whose names shall surface during investigation.

Respected Sir,

I, Sandeep Goyal, Director of Sandeep G Real Estate Ltd., a public limited company engaged in real estate promotion and development, am constrained to lodge this complaint against the accused persons, namely Bimal Roy @ Bimal Chandra Roy, his wife Smt. Dayanti Roy and her sister Smt. Roma Saibo @ Rama Shaibya, all residents of Choto Dhukuria, Patharghata, P.S. Matigara, District Darjeeling. I state that the accused persons, with deliberate dishonest

Sandeep G. Real Estate Ltd.

Director

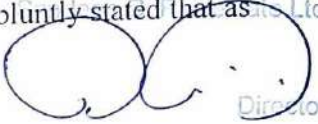
intent and in collusion with each other, have cheated me and my company to the tune of several crores of rupees, despite my continuous compliance with contractual obligations and despite being placed in settled possession of the land agreed to be sold. Their conduct discloses grave cognizable offences under the Bharatiya Nyaya Sanhita, and hence this complaint is being filed for registration of FIR.

On 21.12.2024, the accused executed a written Agreement to Sell in favour of my company for transfer of 12.65 acres of land situated at Mouza Rajpouri, P.S. Matigara, District Darjeeling. The property comprised Schedule A measuring 4.01 acres, Schedule B measuring 8.445 acres, and Schedule C measuring 0.20 acre, together forming a contiguous block. The agreed consideration was Rs. 89 lakhs per bigha for Schedule A and B lands and Rs. 44.5 lakhs per bigha for Schedule C, making the total consideration approximately Rs. 33.78 crores. At the time of execution, I paid Rs. 25 lakhs as advance, which was duly acknowledged by the accused, and further payments were scheduled to be made in stages against execution of registered conveyances for specific portions of the land.

In faithful discharge of my liability, I have continuously and uninterruptedly made payments towards the agreed consideration. Several crores of rupees have already been paid through cheques, RTGS transfers, and cash, all duly acknowledged by the accused through signed receipts. Registered conveyances bearing Nos. 971, 972 and 976 of 2024-25 have already been executed in my favour for certain parcels of the property. Additionally, the entire 12.65 acres was placed in my possession, and in exercise of my contractual rights, I commenced site developmental works, constructed site offices, security office, hutments, erected boundary walls, demarcations, electrical & plumbing infrastructural works, bore wells, and invested further resources for marketing and promotion and also obtained an electric connection.

At the time of execution, the accused specifically represented that they had clear and marketable title to the land, that it was free from encumbrances, claims, or tenancies, and that they would secure necessary permissions in respect of tribal lands falling within Schedule B. They further assured that they would cooperate in executing conveyances, in effecting mutation and transfer, and that no third-party rights would be created. Relying on these solemn representations, I altered my position irreversibly, invested large sums, mobilised men and material, and planned projects upon the land.

However, despite my continuous compliance and despite being in lawful possession, the accused have now adopted dishonest tactics. On 22.07.2025, I was informed by my staff that the accused were showing the very same land to prospective buyers and conducting measurements with intent to sell to outsiders. On confronting them, they bluntly stated that as

  
Director

14. Signature / Thumb impression  
of the Complainant / Informant

15. Date & Time of despatch to the court :

ARMOUR Police Station  
Name : ARMOUR POLICE STATION  
Rank : No. IN CHARGE  
Matigara PS/SPC



they were receiving better offers, they were unwilling to perform the agreement with me. This was the first open indication of their dishonest design to defraud me despite receiving substantial sums and handing over possession.

On 24.07.2025, the accused sent me a "Note Sheet" on WhatsApp containing unilateral, whimsical, and coercive conditions. These included demands for enhanced rate of land, restrictions on construction, compulsory purchase of materials from them at inflated prices, escalations beyond agreed consideration, and even a clause enabling them to cancel the entire deal by refunding my money at their discretion. These terms were never part of the contract, and the imposition of such arbitrary conditions after receipt of huge amounts is a clear attempt at extortion and cheating.

I further state that on 16.09.2025, the accused persons, namely Sri Bimal Chandra Roy, along with his sister Roma Saibo@ Shaibya, their staff, employees, agents, certain antisocial elements and local associates, armed with deadly weapons, unlawfully attempted to forcibly enter into our above-mentioned project premises, which had been lawfully handed over to us. They threatened my staff, security, site and labourers with dire consequences, including fear of life and death, and attempted to dispossess us from the land. In the process, they committed theft of large quantities of construction materials, including steel rods, MS shuttering and its ancillaries, and other items, the exact quantum of which is still being assessed. They also caused damage to the boundary walls and site structures, creating an atmosphere of violence, rowdiness, and intimidation. This brazen act of attempted forceful dispossession, criminal intimidation, theft, and mischief clearly attracts additional offences under Sections 191(2), 191(3), 190, 303(2), 305(a-e), 328, and 329(3) BNS, apart from the sections already invoked in this complaint.

I further state that the accused persons and some local media news channels via social media platforms have also engaged in a deliberate campaign of defamation against me and my company, spreading false, malicious and baseless allegations amongst local people, workers, prospective customers and the public at large with the sole intent of tarnishing my and my company's reputation, goodwill, image and further obstructing the progress of our project. These defamatory statements have caused serious harm to my and my company's goodwill, image and reputation, standing in society and credibility as a real estate developer, thereby attracting offences under Section 356(2) in addition to the other offences already mentioned herein.

The accused are now refusing to cooperate in the execution of further sale deeds, refusing to support the mutation and transfer of the land already conveyed, and are deliberately creating

14. Signature / Thumb impression  
of the Complainant / Informant

15. Date & Time of despatch to the court :

Signature of the Officer in Charge  
Police Station

Name: ARUN K. B. CHATTERJEE

Rank : No. 1

Maligaha B/SPC



obstacles to frustrate my rights. Their intention is evident: to misappropriate the funds already received and to resell the same land to third parties at higher rates, thereby causing me wrongful loss and securing wrongful gain for themselves. This conduct establishes the dishonest intention that existed even at the inception of the transaction.

The cumulative actions of the accused clearly constitute the offence of cheating under Section **318(4) BNS**, as they dishonestly induced me to part with several crores of rupees and to alter my position by entering possession and investing further sums, while never intending to honour the contract. Their subsequent refusal, their attempt to resell to outsiders, and their imposition of fresh conditions are classic indicia of fraudulent conduct designed to deceive.

The acts also constitute criminal breach of trust under Section **316(2) BNS**, as the accused were entrusted with my funds for the specific purpose of executing registered sale deeds and securing permissions, but have instead misappropriated the same and are refusing to discharge their obligation. Their responsibility to hold my money in trust till conveyance and to use it only for the agreed purpose stands grossly violated.

Furthermore, Section **316(5) BNS** is attracted, as the accused, having accepted responsibility to secure necessary statutory permissions in respect of tribal land and having been entrusted with my advance and instalment amounts, was in a fiduciary position akin to an agent or trustee. Their misappropriation and diversion of funds from this fiduciary capacity make the offence graver and punishable with enhanced liability.

The concerted acts of all three accused, including preparation of a joint "Note Sheet," approaching prospective purchasers jointly, and making collective demands, establish a criminal conspiracy under Section **61(2) BNS**. They have acted in tandem, in collusion, and with full knowledge of each other's acts to cheat me of my money and property. Their common intention is also evident, attracting Section **45 BNS**.

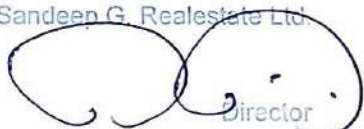
Their repeated threats that they will cancel the deal, resile from their obligations, obstruct mutation, and alienate the land to others constitute criminal intimidation under Section **351(2) BNS**. By these threats, they have sought to coerce me into submission to their illegal demands, thereby instilling apprehension of wrongful loss.

Thus, the conduct of the accused is not merely a civil dispute but discloses grave cognizable offences of cheating, breach of trust, misappropriation, conspiracy, common intention, and intimidation, all punishable under the BNS. The dishonest intention existed from inception and has been carried out through continuous acts of deception, coercion, and misappropriation.

Sandeep G. Real Estate Ltr.  
Dispute

I have documentary evidence in support, including the Agreement to Sell dated 21.12.2024, registered sale deeds, signed money receipts, bank transaction records, the WhatsApp "Note Sheet," and testimony of my staff who witnessed the accused showing the land to third parties. These will fully corroborate my allegations and prove the culpability of the accused. Further, Sri Bimal Chandra Roy, his staff, employees, agents and some anti-social elements are continuously threatening me, my son, my employee, staff, and workers with dire consequences upon us on entering upon the said premises and continuously challenging, threatening of dire consequences and even of false accusations, and also to put false complaints against us through some other persons and/or by any other means and conspiracy. I therefore request you to kindly register a formal First Information Report against the accused persons under Sections 45, 190, 191(2), 191(3), 303(2), 305(a-e), 316(2), 316(5), 318(4), 328, 329(3), 61(2), 356(2), 351(2) of BNS investigate the matter thoroughly, seize relevant documents, prevent alienation of the subject property to third parties, and take strict legal action to prosecute the accused. Their influence and local connections should not be allowed to frustrate the course of justice, as I have approached the police with clean hands after having been cheated of several crores despite complete compliance on my part.

Sandeep G. Realestate Ltd.



Director

Sandeep Goyal

17/09/25

Director

For and on behalf of self and Sandeep G Real Estate Ltd.

(Complainant)

Contact no : 9679910000

Copy forwarded to:

1. To the Hon'ble Commissioner of Police, Siliguri Police Commissionerate.
2. To the Hon'ble Deputy Commissioner of Police, Zone-II (West), Siliguri Police Commissionerate.
3. To the Hon'ble Assistant Commissioner of Police, West-II, Siliguri Police Commissionerate.