

5249



1. Dist. Bhaktinagar P.S. Bhaktinagar Year 2025 FIR No. 1081/25 Date 03/11/25
 2. Sections 329(B)/137(B)/318(B)/324(B)/336(B)/30 in Act. 329(B)/137(B)/318(B)/324(B)/336(B)/30
 3. (a) Occurrence of offence : Day 30/06/25 Date From 30/06/25 Date To onwards
 Time Period 03/11/25 Time From 93 Time To 00:15 hrs
 (b) Information received at P.S. Date 03/11/25 Time 00:15 hrs
 (c) General Diary Reference : Entry No (s) 93 Time 00:15 hrs
 4. Type of Information Court Complaint under Misc. Pet. Case No - 369/25 Written / Oral Written
 5. Place of Occurrence : (a) Direction and Distance from P.S. Beat No.
 (b) Address Land measuring 1.1348 Acre, RS Plot No - 2/90, 2/92, 2/9
10/108, LR Plot No - 210, RS Khatham No - 119, LR Khatham No -
2125, 2126, 2127, 2128, DL No - 02, Sheet No - 04, Pargana Barunthaga
 (c) In case outside limit of this Police Station, then the
 Name of the P.S. — District —
 6. Complainant / Informant :
 (a) Name Sajjan Aggarwal
 (b) Father's / Husband's Name lt. Radha Krishna Aggarwal
 (c) Date / Year of Birth — (d) Nationality Indian
 (e) Passport No. — Date of Issue : — Place of Issue —
 (f) Occupation —
 (g) Address 34, Radha Kunj, Opp Shiv Mandir, beside City Mall,
Punjabi Pura, PS Bhaktinagar,
Dist. Jalpaiguri
 7. Details of known / suspected / unknown accused with full particulars
 (Attach separate sheet, if necessary) :

1) Falin Roy S/o Late Baidya Roy, of Majhabari, PO Ghogomali, PS Bhaktinagar, Dist. Jalpaiguri, 2) Kamakhya Chandra Paul S/o Late Sushil Chandra Paul, of Najrul Sarani by lane, Ashrampara, PO & PS Siliguri, Dist. Darjeeling, 3) Bajar Roy S/o Late Gayas Roy of Salugara, PO Salugara, PS Bhaktinagar, Jalpaiguri, 4) Ghatalu Roy S/o Late Chali Roy @ Chhali Roy of Salugara, PO Salugara, PS Bhaktinagar, Jalpaiguri, 5) Bidhan Chandra Biswas S/o Late Paniya Biswas, of Katupara, Sukhani, PO Sabab Para, PS Rajganj, Dist. Jalpaiguri and 6) Bubai Poddar S/o Jaymangal Poddar of Ramkrishna Road, Ward No. 39 of Siliguri Municipal Corporation, Siliguri, PO Rabindrasarani, PS Bhaktinagar, Dist. Jalpaiguri and others.

Inspector-in-Charge
Bhaktinagar Police Station
Siliguri Police Commissionerate

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 court complaint which is
tweeted 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 Pradip Dey to take up investigation / refused investigation / transferred to P.S. — on point of 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 is on the complaint

DR No. 8322 Date 4/11/25
Bhaktinagar Police Station

Inspector-in-Charge
Bhaktinagar Police Station
Signature of the Officer-in-Charge, Police Station Shri Amit Kumar
Name : Shri Amit Kumar
Rank : No. 20 Bhaktinagar
PS, SPC

15. Date & Time of despatch to the court :



Ref:- Rajganj PS Case No-332/2025 Dated 28.10.25

Order dated-30.10.25

A prayer is received from I.O SI Shiva Dural of Rajganj P.S for transferring the case to I/C Bhaktinagar P.S for its further investigation.

I.O is present with C.D.

Heard Ld. APP who submits that the case may kindly be transferred to the I/C Bhaktinagar Police Station for further investigation as the P.O is falls under the jurisdiction of the Bhaktinagar P.S.

Perused the C.D and the record.

This case has been initiated on the strength of written complaint of one Sajjan Agarwal S/O Lt. Radha Krishna Agarwal on 18.10.2025 on the basis of said complaint vide Rajganj P.S Case No-332/2025 Dated 18.10.25 U/S 329(3)/137(2)/318/318(2)/324(2)/336(3)/3(5) of BNS was registered after the receipt of the complaint.

The place of occurrence at Ward No-⁴² Shib Nagar, Pipe Line, PO- Salugara. Investigation has revealed that Place of occurrence falls within the jurisdiction of Bhaktinagar P.S.

In such facts and circumstances, the prayer of the I.O is allowed for the ends of justice.

GRO, Jalpaiguri is directed that to send the FIR (Written) dated 18.10.25 and other relevant papers and I.O of this case is directed to hand over the original case diary to the I.C Bhaktinagar P.S for proceeding further in the case.

GRO, Jalpaiguri is also directed to keep certified to one copies of the documents mentioned above and do what is necessary at once.

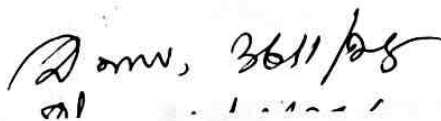
D/C by me


C.J.M. Jalpaiguri
C.J.M.
JALPAIGURI


C.J.M. Jalpaiguri
C.J.M.
JALPAIGURI

Let a copy of this order is forwarded to the I.O of this case and another copy of this order is forwarded to the I/C Bhaktinagar P.S for kin information and compliance.


GRO (S) COURT,


GRO (S) COURT,



Sd/- Vikram Agarwal

4269/25
Advocate

IN THE COURT OF THE LD. CHIEF JUDICIAL MAGISTRATE
AT JALPAIGURI

Ref: Misc. Petition Case No. 369/25 of 2025 C.J.M., JALPAIGURI

IN THE MATTER OF:

An Application under Section 175 (3) of the
Bharatiya Nagarik Suraksha Sanhita, 2023.

-AND-

NAME AND ADDRESS OF THE COMPLAINANT:

SRI SAJJAN AGARWAL,

Son of Late Radha Krishna Agarwal,
Resident of 34, Radha Kunj, opposite Shiv
Mandir, beside City Mall, Punjabi Para, Post
Office: Siliguri, Police Station: Bhaktinagar,
District: Jalpaiguri, Pin Code: 734001

NAME AND ADDRESS OF THE ACCUSED PERSONS:

1. SRI FALIN ROY,

Son of Late Baidya Roy,
Resident of Majhabari, Post Office: Ghogomali,
Police Station: Bhaktinagar, District: Jalpaiguri,
Pin code: 734006.

2. SRI KAMAKHYA CHANDRA PAUL,

Son of Late Sushil Chandra Paul,
Resident of Najrul Sarani by lane,
Ashrampara, Post Office & Police Station:
Siliguri, District: Darjeeling, Pin Code:
734006,

3. SRI BAJARU ROY,

Son of Late Gayas Roy,
Resident of Salugara, Post office: Salugara,
Police Station: Bhaktinagar, District:
Jalpaiguri, Pin Code: 734008,

Received on 18/10/25 at-
18.05 Vide Rajganj PS QD NO-
772 and started Rajganj PS
Case no- 332/25 dt 18/10/25
U/S 329(3)/324(2)/137(2) 318/
318(2)/336(3)/315 B.N.S.

INSPECTOR-IN-CHARGE
RAJGANJ POLICE STATION
DIST. JALPAIGURI

Sajjan Kumar Agarwal

Filed by:-

For Dep. Secy.

Advocate

SEEN

C.J.M., JALPAIGURI

4. SRI GHATALU ROY,

Son of Late Chali Roy @ Chhali Roy,
Resident of Salugara, Post office: Salugara,
Police Station: Bhaktinagar, District:
Jalpaiguri, Pin Code: 734008,

5. SRI BIDHAN CHANDRA BISWAS,

Son of Late Paniya Biswas,
Resident of Katupara, Sukhani, Post office:
Sabeb Para, Police Station: Rajganj, District:
Jalpaiguri, Pin Code: 735134,

6. SRI BUBAI PODDAR,

Son of Sri Jaymangal Poddar,
Resident of Ramkrishna Road, Ward No. 39 of
Siliguri Municipal Corporation, Siliguri, Post
Office: Rabindrasarani, Police Station:
Bhaktinagar, District: Jalpaiguri, Pin Code:
734006

DATE OF OFFENCE: 30.06.2025 and still continuing.

The humble petition on behalf of the above-named **Complainant**.

Most Respectfully SHEWETH:

1. That the Complainant is a peace loving and law-abiding citizen of India.
2. That the Complainant states that
 - (i) Smt. Reha Devi Agarwal, wife of Sri Sajjan Agarwal,
 - (ii) Smt. Manju Devi Agarwal, wife of Sri Om Prakash Agarwal,
 - (iii) Smt. Saroj Devi Agarwal, wife of Basant Kumar Agarwal,
 - (iv) Smt. Reshmi Devi Agarwal, wife of Sri Raj Kumar Agarwal(hereinafter referred to as the **"PURCHASERS"** for the sake of gravity), all are residents of Punjabi Para, Radha Kunj, opposite Shiv Mandir, beside City Mall, Post Office: Siliguri, Police Station: Bhaktinagar, District: Jalpaiguri, Pin Code: 734001 purchased a plot of land

Sujjan Kumar Agaswal

SEEN

C.J.M. JALPAIGURI

Filed by:
Jyoti Choudhury
Advocate

measuring 1.1348 Acres appertaining to and forming part of R.S. Plot No. 2/90, 2/92, 2 & 10/108 corresponding to L.R. Plot No. 210 recorded in R.S. Khatian No.119 corresponding to L.R Khatian No. 2125, 2126, 2127, 2128, J.L No. 02, Sheet No. 04, Pargana- Baikunthapur, Mouza- Dabgram, BL & LRO: Rajganj, District: Jalpaiguri, vide Deed No. I-158 of 2002 from

- (i) Sri Binod Kumar Gupta, Son of Late Banwari Lal Gupta,
 - (ii) Usha devi Gupta, Wife of Sri Binod Kumar Gupta, and
 - (iii) Smt. Bina Devi Gupta, Wife of Late Banwari Lal Gupta,
- all residents of Punjabi Para, Siliguri, District: Darjeeling. Since the purchase, the purchasers are in possession of the said land and have been enjoying the rights of the land.

3. That thereafter, the names of the purchasers were mutated vide Mutation Case No. IX-11/42491/02-03 in the record of rights.
4. That during the L.R. survey, the Land Revenue Officials recorded the name of the purchasers in L.R. Plot No. 210 after recording their names in Math Khosra.
5. That thereafter, on application being made by the purchasers, the characters of the land were changed from Sohori to Gudam, and to that effect, conversion certificates were issued in their respective names.
6. That on 30.06.2025, the purchasers came to know that the abovenamed accused persons along with their associates kidnapped two of their security guards from the said land and tried to illegally gain possession of the same.
7. That on enquiry, they came to know that, these aforesaid Accused Persons in connivance with one staff of BL & LRO, Rajganj namely - **i. Joydeb Roy Choudhury and Block Land & Land Reforms Officer, Rajganj** and other staffs of BL & LRO, Rajganj removed the area of land from the records of rights of the purchasers.
8. That the aforesaid persons, on the basis of false and fabricated documents showing the aforesaid purchasers as subsequent sellers manipulated the records of rights issued in the name of the purchasers.

Sujjan Kumar Agarwal,

Filed by:-
Joydeb Roy
Advocate

SEEN

C.J.M. JALPAIGURI

9. That later, the purchasers obtained the certified copies of the order sheets dated 05.03.2025 the Mutation Cases being MN/2025/0701/5699, MN/2025/0701/5700, MN/2025/0701/5701, MN/2025/0701/5703, MN/2025/0701/5705, MN/2025/0701/5706 from the office of B.L. & L.R.O. Rajganj, and on perusal of the said order sheets, it transpired that, the names of said **1.Sri Falin Roy, 2.Sri Kamakhya Chandra Paul, 3.Sri Bajar Roy, 4.Sri Ghatalu Roy, 5.Sri Bidhan Chandra Biswas and 6.Sri Bubai Poddar** has been recorded in the L.R. record of rights in place of the names of the purchasers in respect of L.R. Plot No. 210, Mouza- Dabgram, Sheet No. 4, J.L. No. 2, P.S. Rajganj, Dist. Jalpaiguri and separate L.R. Khatians were opened in their names being L.R. Khatian No. 3356, 3341, 3334, 3332, 3355 and 3342.
10. That it was further transpired that in doing so no notices whatsoever were served upon the above-named purchasers but the accused persons manipulated with the records, falsely impersonated the purchasers, and showed their presence at the time of hearing and moreover also submitted manufactured "No Objections" on behalf and in the names of the purchasers.
11. That subsequently, on 31.07.2025, some of the above named purchasers namely, Saroj Devi Agarwal and Manju Devi Agarwal had written two separate letters to the B.L. & L.R.O. Rajganj thereby requesting him to supply documents viz., Copy of petition filed by the applicant, transfer documents, notices issued on 26.03.2025, service return of such notice, Haziras filed by Saroj Devi Agarwal and Manju Devi Agarwal, investigation report, no objection filed by Saroj Devi Agarwal and Manju Devi Agarwal, field verification report, authority in favour of Joydeb Roy Choudhury in respect of Mutation Cases no. MN/2025/0701/5705 and MN/2025/0701/5699 respectively.

It is pertinent to mention here that despite such requests, no copy of the aforesaid documents as asked by Saroj Devi Agarwal and Manju Devi Agarwal in their letter dated 31.07.2025 have been provided to them till date for the reasons best known to B.L. & L.R.O. Rajganj.

Sajjan Kumar Agarwal

Filed by:

Pradyumn Singh

Advocate

SEEN

C.J.M. JALPAIGURI

12. That one **Sonam Rumba** who is an officer of the B.L. & L.R.O., Rajganj had sent an order sheet dated 28.07.2025 to the complainant through whatsapp whereby, it, inter alia, came to their knowledge that the in the last week of July, 2025 the B.L.& L.R.O. Office, Rajganj received informal allegations regarding legitimacy of transfers of mutation case nos. MN/2025/0701/5699, MN/2025/0701/5700, MN/2025/0701/5701, MN/2025/0701/5703, MN/2025/0701/5705, MN/2025/0701/5706 and a search was ordered and three days later files were recovered from the ladies bathroom of the office of B.L.& L.R.O. Rajganj and the '**No Objection Letters**' the primary documentary foundation of the mutations were missing from the case record.

13. That that aforesaid Accused Persons namely

- (i) Sri Falin Roy,
- (ii) Sri Kamakhya Chandra Paul,
- (iii) Sri Bajar Roy,
- (iv) Sri Ghatalu Roy,
- (v) Sri Bidhan Chandra Biswas,
- (vi) Sri Bubai Poddar along with Joydeb Roy Choudhury, B.L. & L.R.O. Rajganj and other officers of the B.L.& L.R.O. in connivance with each other had manufactured documents including the 'No Objection letters' and had committed serious offence of forgery and manipulation of government records for their ulterior motive and illegal gain.

14. That on 10.09.2025 the Complainant as per the provision of Section 173 (1) (ii) of the Bhartiya Nagarik Suraksha Sanhita, 2023 made electronic communication to Rajganj Police Station and Superintendent of Police, Jalpaiguri and on 13.09.2025 went to the Rajganj Police station to sign the same but the police officials refused to get the complaint signed by the complainant and register the same as FIR.

15. That after the said electronic communication, neither any investigation was made by police nor any F.I.R has been registered till date and the concerned police officers are avoiding to perform their duty deliberately and they are adamantly not taking any actions against the Accused Persons responsible for committing the offences as stated above. Therefore, it is necessary for this Ld. Court to direct the Inspector-In-

Sijon Kumar Agarwal

SEEN

C.J.M., JALPAIGURI

charge, Rajganj Police Station to register a FIR against the Accused Persons as per law.

16. That the offences have been committed within the territorial jurisdiction of this Ld. Court, and therefore this Ld. Court has jurisdiction to entertain this application and take cognizance in this matter as the Inspector-In-charge, Rajganj Police Station and Superintendent Of Police, Jalpaiguri have failed to perform their statutory duties which they are obligated to and direct the Inspector-In-charge, Rajganj Police Station to start specific case against the Accused Persons.
17. That after exhausting all the possible manner to get the complaint registered and miserably failing to do so, the Complainant is moving this application under the provision of Section 175(3) of the Bharatiya Nagarik Suraksha Sanhita, 2023.
18. That the facts as stated in the Petition clearly states cognizable offences committed by the Accused Persons and they should be booked under the relevant provisions of law and this complaint be treated as FIR.
19. That this petition is made bonafide for the ends of justice.

Received on 03/11/25 at 00:15 hrs with
GOC no- 93 and started Chakhiroga
as case no- 1081/25 Dtd- 03/11/25
u/s 329 (3)/137 (2)/318 /318 (2)/324 (2)/
336 (3) /3 (5) BNS, 2023 and endorsed
to SI Prodipto Dey for its
investigation.

03.11.25
Inspector-In-Charge
Bhaktinagar Police Station
Jalpaiguri Police Commissionerate

Under the above circumstances it is humbly prayed that Your Honour would graciously be pleased to direct the Inspector-In-charge, Rajganj Police Station to treat this Complaint as FIR and investigate the matter and submit investigation report before this Ld. Court and/or pass any other order or orders as your Honour may deem fit and proper, for ends of justice.

And for this act of kindness your Petitioner/Complainant as in duty bound shall ever pray.



SEEN

J.M. JALPAIGURI

19/10/25

AFFIDAVIT

I, **SRI SAJJAN AGARWAL**, Son of Late Radha Krishna Agarwal, aged about 56 years, Resident of 34, Radha Kunj, opposite Shiv Mandir, beside City Mall, Punjabi Para, Post Office: Siliguri, Police Station: Bhaktinagar, District: Jalpaiguri, Pin Code: 734001, do hereby solemnly affirm and declare as follows:

1. That I am the complainant of this case and I am well acquainted with the fact and circumstances of this case.

....This is true to my knowledge and belief

2. That the statements made in paragraph Nos. 1 to 19 of the foregoing Petition are true to the best of my knowledge and belief and rest are my humble submissions before this Ld. Court.

....This is true to my knowledge and belief

3. That I sign this affidavit on this the 16th day of September, 2025 at Jalpaiguri.



Solemnly Affirm and Declared
before me on proper Identification
Bimal Ghosh
BIMAL GHOSH, NOTARY
Regd. No. 55773/2025 (Govt of India)
Jalpaiguri Judges' Court

Sajjan Kumar Agarwal

DEPONENT

Identified by me

Fajidpur

Advocate

F/2901/2022

16 SEP 2025