

FIRST INFORMATION REPORT

(Under Section 154 Cr. P.C.)



1. District: Darjeeling, Siliguri Year: 2025, FIR No.: 77/1/25, Date: 27/11/25
2. Act: BNS, Sections: 316(2)/318(2)/41/126(2)/115(2)/117(2)/303(2)
3. Occurrence of offence: Day: X, Date From: 19-9-25, Date To: X

Time Period: Time From: Not mentioned, Time To: 17-30 hours.
(b) Information received at P.S. Date: 27-11-2025, Time: 17-30 hours.

(c) General Diary Reference: Entry No(s): 1249 (one network), Time: 19-30 hours.

4. Type of Information: Written, Written / Or: /

5. Place of Occurrence: (a) Direction and Distance from P.S.: 1.5 Km, N West, Beat No. /
(b) Address: S.F. Road Jajodia Market, PS. Siliguri.

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

6. Complainant / Informant: Rohit Prasad Prasad

(a) Name: Rohit Prasad Prasad

(b) Father's / Husband's Name: Dara sath Prasad

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

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

(f) Occupation: Advocate

(g) Address: S.F. Road, Jajodia Market, Ward. No-9 PS. Siliguri, Dist. Darjeeling

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

(Attach separate sheet, if necessary): Rajesh Agarwal s/o Babul Agarwal @ Boja Agarwal w/o Rajesh Agarwal and others.

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

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 complainant - which treated as FIR enclosed herewith / reproduced below

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 SP. Sudip Dutta of Siliguri PS. (KHP-TOP) 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.

Noted in written complainant - 27-11-25

14. Signature / Thumb impression of the Complainant / Informant: SILIGURI P.S. Signature of the Officer-in-Charge, Police Station

15. Date & Time of despatch to the court: dt-27-11-25 at 19:30 hrs, 27/11/25 Inspector in Charge, Siliguri Police Station Rank: SPC

Date: 27-11-2025

To,  
The Officer-In-Charge,  
Khalpara T.O.P., (under Siliguri P.S.),  
Siliguri, West Bengal

**Subject:**

Complaint to lodge FIR against Pooja Agarwal W/O. Rajesh Agarwal (9832438282, 8101286110) Rajesh Agarwal S/O. Shri Babulal Agarwal (9064141200, 6296597957, 9647994780, 9873032199) and others for Committing Serious Criminal Offences including Criminal Conspiracy, Cheating, Fraud, Criminal Breach of Trust, Criminal Intimidation, Assault, Voluntarily Causing Hurt/Grievous Hurt, Theft, Snatching, Death-Threats, Wrongful Restraint, Common Intention, Blackmailing, Violation of Bail Conditions and Lodging of False FIRs.

Respected Sir,

With dues respect I, Rohit Prasad (Advocate), S/O. Shri Dasarath Prasad, resident of S.F. Road, Jajodia Market, Ward No. 9, Siliguri, Dist. Darjeeling, West Bengal, Pin - 734005 would like to make formal written complaint to lodge FIR against Pooja Agarwal W/O. Rajesh Agarwal (9832438282, 8101286110), Rajesh Agarwal S/O. Shri Babulal Agarwal (9064141200, 6296597957, 9647994780, 9873032199), permanent resident of 3<sup>rd</sup> Floor, Prabhat Residency, Opp. Ganga Apartment, Near Ashirwad Medical Centre, Mangal Pandey Road, Khalpara, Ward No. 9, Siliguri, Dist.- Darjeeling, West Bengal, Pin - 734005 and others which were stated as mentioned:

1) That I had rendered professional legal and consultation services to Rajesh Agarwal for his business interests across the period 2020 to 2023 in connection with the following firms, namely:

- A) **Bengal Wool Umbrella House (GSTIN:19ACCPA1957G1ZU)**,  
Address: Ground floor, 41/1213/713/1, Mallaguri, Ward No.2, Temple Streets, Siliguri, Dist.- Darjeeling, West Bengal, Pin-734003.
- B) **Bengal Wool Agency (GSTIN: 19AEVPA1537P1ZW)**,  
Address: 65/4/59, Hill Cart Road, Ward No. 11, Siliguri, Dist.-Darjeeling, West Bengal, Pin-734001.
- C) **Sumeru Suppliers (GSTIN: 07ACCPA1957G1ZZ)**,  
Address: G/F, 104-I, Gali-9, Jagat Puri Azad Nagar, New Delhi, East Delhi, Delhi, Pin-110051.

2) That in recognition of the outstanding dues for my services rendered, Mr. Rajesh Agarwal executed a written Agreement on 05.01.2024, acknowledging his liability to pay ₹9,30,000.00 (Rupees Nine Lakhs Thirty Thousand Only) as professional fees. As per the Agreement, he undertook to clear the full dues on or before 30.06.2024.

3) That despite repeated reminders through legal notices but Mr. Rajesh Agarwal wilfully failed and neglected to pay the agreed sum. Instead, he resorted to issuing threats via WhatsApp Messages and Voice Calls, with the sole intent to intimidate and silence me from pursuing legal recourse.

4) That due to his non-compliance and threatening behaviour, I was constrained to file a criminal complaint, and subsequently, FIR No. 414/25 dated 16.06.2025, which was registered at Pradhan Nagar P.S. The accused thereafter secured Anticipatory Bail from the Hon'ble Calcutta High Court - Circuit Bench at Jalpaiguri, vide C.R.M. (A) 431 of 2025, dated 01.07.2025.

5) That it was revealed during the course of the aforesaid anticipatory bail proceedings, shockingly it was revealed that his wife, Mrs. Pooja Agarwal, had lodged a false and frivolous FIR No. 135/24 dated 16.02.2024 at Panitanki T.O.P. (Under Siliguri P.S.), falsely alleging that I was her "Employee," whereas during the period apart from my legal practice I was also a regular student pursuing LL.M. (Session: 2021-2023) from Indian Institute of Legal Studies (IILS), affiliated by the University of

(Page 1 of 4)



North Bengal, located at Dagapur. This complaint was manifestly fabricated and lodged with the malicious intent of defeating my legitimate legal claim and misleading the Hon'ble Court.

6) That it has since become evident that both Mr. Rajesh Agarwal and Mrs. Pooja Agarwal are acting in criminal collusion, having engaged in conspiracy, fraud, fabrication of false evidence, and criminal intimidation, all aimed at denying lawful dues and obstructing justice and avoid repayment of legally owed dues and their actions constitute criminal breach of trust, cheating, conspiracy, fabrication of false evidence, and criminal intimidation, all with the intent to deceive and financially harm me.

7) That as per the Agreement dated: 05.01.2024, the financial liability owed to me stands as follows:

- Principal Amount = ₹9,30,000.00
- Interest @ 12% p.a. from 05.01.2024 to 27.11.2025 (Approx. 1.9 years) = ₹2,70,000.00 (Approx.)
- Total Outstanding as on 11.09.2025 = ₹12,00,000.00 (Approx.)

Thus, the total outstanding dues now amount to ₹12,00,000.00 (Approximately Rupees Twelve Lakhs Only), which remains unpaid till date.

8) That on 13.08.2025, while I was returning from City-Centre at approximately 10:30 PM and passing through the Matigara Rail Gate Area, I was continuously being followed by Rajesh Agarwal including his wife Pooja Agarwal from his vehicle bearing Registration No.: WB 74 BP 5893 and 03 (Three) criminal miscreants who had physically restraint me near Tea Garden, close to the Matigara Rail Gate and threatened to kill me and subjected to verbal abuse, using filthy and offensive languages and when I had opposed their unlawful and coercive actions, they became aggressive and physically assaulted me and grabbed my neck, twisted my arms, and forcefully pushed me, as a result, I fell on the street in a further attempt to intimidate me, as I was attempting to call the police helpline to report the incident, one of the miscreants had snatched my mobile phone (Model: Apple iPhone 12, IMEI: 354244472361449) from my hand, preventing me from contacting law enforcement for help and taking advantage of my vulnerable position. Although, they had stolen my Honda Activa 125, bearing Registration No. WB 74 BE 1909, which was in my possession at that time, after committing the theft, they abandoned me on the street and fled the scene and on dated: 14.08.2025, I had lodged a complaint about the incident to the Matigara P.S., for committing serious cognizable offences including but not limited to Wrongful Restraint, Physical Assault, Criminal Intimidation, Conspiracy, Death-Threats, Thefts and Snatching.

9) That on 01.09.2025, I served a legal notice upon Mrs. Pooja Agarwal for filing a false complaint. Shortly thereafter, her husband, Mr. Rajesh Agarwal, resumed threatening me through WhatsApp and Phone calls and filed a complaint in respect to my previous complaint vide, G.D.E. No. 191, dated: 17.06.2025.

10) That on 03.09.2025 in the evening hours, while I was travelling by my Yamaha Bike near the flyover adjacent to State Guest House, Mr. Rajesh Agarwal, with criminal intent, intentionally struck my vehicle from behind, from his vehicle bearing Registration No.: WB 74 BP 5893 causing me to fall and sustain grievous injuries to my legs and elbow and due to which the silencer of my motorcycle was also damaged in the accident, following the collision, Mr. Rajesh Agarwal physically restrained me and verbally abused me in public, and issued death threats, demanding to withdraw the pending criminal case filed against him and this was a clear attempt to intimidate me and obstruct justice, immediately I had reported about the incident in written at Pradhan Nagar P.S., and the same was duly registered as G.D.E. No. 316, dated 05.09.2025.

11) That on 04.09.2025 Mr. Rajesh Agarwal, Pooja Agarwal along with his family members and associates had forcefully restraint me in public during the afternoon hours, nearby Shankar More, which comes under the jurisdiction of Khalpara T.O.P, and again threatened me to withdraw the ongoing criminal case. This incident is in gross violation of the bail conditions imposed upon him by



22.11.25

the Hon'ble Court. He has failed to comply with such conditions and continues to act with impunity and blatant disregard for the law.

- 12) That on 10.09.2025, when I had re-visited to the Khalpara Outpost (under Siliguri P.S.) despite my medical condition, to know the status of my complaint, whereas related to the incident of 04.09.2025, Mr. Rajesh Agarwal suddenly arrived at the outpost and, in the presence of the police personnel, began hurling verbal abuses and issuing death threats. Such audacity to threaten a complainant in a police station reveals his continued criminal conduct and contempt for legal processes.
- 13) That again Mrs. Pooja Agarwal in conspiracy with her husband Mr. Rajesh Agarwal had maliciously lodged a false and fabricated FIR against me vide Case No. 613/25, dated: 15.09.2025 at Khalpara Town Outpost (under Siliguri P.S.), alleging baseless charges, with the sole intention to harass, humiliate, and blackmailing him to withdraw the previous complaints against her including her husband Mr. Rajesh Agarwal.
- 14) That the allegations mentioned in the said FIR are absolutely false, concocted, and devoid of truth and I respectfully submit that I have cogent and unimpeachable evidence to establish that on the alleged date, i.e., 08.09.2025, and at the alleged time, i.e., 10:30 A.M., as stated in the aforesaid FIR but the actual fact is that I was present at the Metropolitan Magistrate Court, Calcutta, in connection to discharge my professional duties, representing a client in Case No. CS/159767/25 before the Learned Judicial Magistrate, 9th Court at Calcutta. Furthermore, it is pertinent to state that on 07.09.2025, I was travelling by Padatik Express (NJP to Sealdah), and thereafter, he returned to Siliguri on 09.09.2025 by Darjeeling Mail (Sealdah to NJP). The aforesaid facts and records clearly establish that the complaint lodged against me is false, malicious, and motivated with the sole intention of causing me, harassment and mental agony as well as tarnishing my social and professional reputation in the society and it is further submitted that the said false FIR has been deliberately instituted with the ulterior motive of blackmailing me and creating unlawful pressure upon me to withdraw the legitimate complaint which I had earlier filed against them, thereby amounting to a clear abuse of the process of law.
- 15) That on 19.09.2025, again I had served a legal notice to Mrs. Pooja Agarwal, regarding the false accusations and malicious allegations made against me in an FIR lodged by her, which have caused me severe mental harassment, mental agony, and trauma. In the said legal notice, I had demanded that she immediately cease and desist from making any further false statements or claims detrimental to my personal and professional life. I had also made it clear that I would be constrained to take appropriate legal action if such false allegations continued. However, after receiving the said legal notice, both Mrs. Pooja Agarwal and her husband Mr. Rajesh Agarwal had started blackmailing and threatening me to lodge more false and fabricated FIRs against me with the ulterior motive to implicate me in several criminal cases, thereby spoiling my reputation, career, and personal life. They have further threatened me stating that they hold influential positions, have connections with political leaders, and can go to any extent, including finishing my life. This has caused me greatest fear for my safety and well-being.

In light of the cumulative facts and incidents described above, it is clear that the accused persons have committed several serious and cognizable offences, including but not limited to Criminal Conspiracy, Criminal Breach of Trust, Cheating, Criminal Breach of Trust, Criminal Intimidation, Assault, Voluntarily Causing Hurt/Grievous Hurt, Theft, Snatching, Death-Threats, Wrongful Restraint, Common Intention, Blackmailing, Violation of Bail Conditions and Lodging of False FIRs, and in view of the above, I most humbly and respectfully pray that your good office may be pleased to treat this complaint as an FIR and register a criminal case against Pooja Agarwal, Rajesh Agarwal, his family members and others miscreants under the appropriate provisions of the BNS and initiate immediate investigation into the criminal acts committed by the accused persons to Ensure my protection against any further threats or acts of retaliation and duly take necessary steps to initiate proceedings for cancellation of anticipatory bail granted to Mr. Rajesh Agarwal for blatant violation of bail conditions.



**Enclosed:**

- 1) Photocopy of Agreement & Statement of Ledger, dated: 05.01.2024.
- 2) Photocopy of FIR No.: 135/24, dated: 16.02.2024 (Siliguri P.S.).
- 3) Photocopy of Certificate (LL.M. Session: 2021-2023) of ILS Law College, dated: 15.09.2021.
- 4) Photocopy of FIR No.: 414/25, dated: 16.06.2025 (Pradhan Nagar P.S.).
- 5) Photocopy of Complaint to Cyber P.S., vide G.D.E. No.: 191, dated: 17.06.2025.
- 6) Photocopy of screenshot of WhatsApp messages (9064141200).
- 7) Photocopy of Anticipatory Bail Order of "Hon'ble High Court at Calcutta" dated: 01.07.2025.
- 8) Photocopy of Complaint to Matigara P.S., dated: 14.08.2025.
- 9) Photocopy of Complaint to Matigara P.S., dated: 10.10.2025.
- 10) Photocopy of R.C. of Honda Activa 125 (WB 74 BE 1909).
- 11) Photocopy of Insurance of Honda Activa 125.
- 12) Photocopy of Tax invoice of Honda Activa 125.
- 13) Photocopy of Road Tax of Honda Activa 125.
- 14) Photocopy of Pollution.
- 15) Photocopy of Loan Sanctioned Letter of Honda Activa 125.
- 16) Photocopy of Intimation to R.T.O., dated: 18.08.2025.
- 17) Photocopy of Letter of Insurance Claim, dated: 23.09.2025.
- 18) Photocopy of N.O.C. of Bank, dated: 03.11.2025.
- 19) Photocopy of Application for Blacklisting of Activa 125 (WB 74 BE 1909), dated: 26.11.2025.
- 20) Photocopy of Mobile Bill of iPhone 12 (128 GB).
- 21) Photocopy of Legal-Notice, dated: 01-09-2025.
- 22) Photographs of Bike Damages, dated: 03.09.2025
- 23) Photocopy of Medical-Reports, dated: 03.09.2025 to 05.09.2025.
- 24) Photocopy of Complaint to Pradhan Nagar P.S., vide G.D.E. No. 316, dated: 05-09-2025.
- 25) Photocopy of Train-Ticket, dated: 07.09.2025 (NJP to Sealdah, Time: 20:30 to 06:45).
- 26) Photocopy of Order and Petition filed before the Ld. Judicial Magistrate, 9<sup>th</sup> Court at Calcutta, as a Legal-Counsel on behalf of my client, dated: 08.09.2025.
- 27) Photocopy of Train-Ticket, dated: 08.09.2025 (Sealdah to NJP, Time: 22:15 to 07:50).
- 28) Photocopy of RTI Confirmation of Train-Ticket, dated: 13.10.2025.
- 29) Photographs of Rajesh Agarwal, threatening in front of police personnel, dated: 10.09.2025.
- 30) Photocopy of FIR No.: 613/25, dated: 15.09.2025 (Siliguri P.S.).
- 31) Photocopy of Defamation-Notice, dated: 19-09-2025.

**Copy to:**

a) The Commissioner, Siliguri Police Commissionerate

Thanking you,  
Yours faithfully,

*[Signature]*  
Rohit Prasad (Advocate)  
B.Com. (Hons.) LL.B., LL.M.  
(Contact No.: 8670333895)



*SLG Received vide 1249*  
*SLG PS. G.D. No. 1249/25*  
*SLG 27-11-25 & started*  
*SLG 27-11-25 Case No. 771/25*  
*318(2) U/S - 316(2)*  
*303(2) / 351(2) / 115(2) / 117(2)*  
*Sudip Dutta (101, KHP-TOP) SPC*  
*27-11-25*

*Received on 27.11.25 at 18:50 hrs vide*  
*Khalpara TOP vide NO-846 dt. 27.11.25 and*  
*forwarded to ie Siliguri PS to started*  
*a specific case under proper section*  
*of law.*

*[Signature]*  
 27/11/2025  
 Officer in Charge  
 Khalpara T.O.P.  
 P.S. Siliguri  
 Siliguri Police Commissionerate

Inspector-in-Charge  
 Siliguri Police Station  
 SPC