



1. Dist. Jalpaiguri Year 2026 FIR No. 70/26 Date 29/01/26
 2. i) Act. BUS. ii) Act. 296/223/3(5) Sections _____
 iii) Act. _____ Sections _____ iv) Others Acts & Sections _____

3. (a) Occurrence of offence : Day _____ Date From 01-28-01-26 Date To _____
 Time Period _____ Time From 15:00 hrs. Time To _____
 (b) Information received at P.S. Date 29/01/26 Time 17:15 W2S
 (c) General Diary Reference : Entry No (s) 1628 Time 17:15 W2S
 Type of Information _____ Written / Oral _____

5. Place of Occurrence : (a) Direction and Distance from P.S. _____ Beat No. _____
 (b) Address 18 Katna 6 Chataks land, R.S. Plot No. 468, 468/1441 & 468/1442
LR Plot No - 140, R.S. Khation No - 296/3 & 298, LR Khata No - 385, 383
& 377 mouza - Dabgram, PS - NJP, W.N. 02.
 (c) In case outside limit of this Police Station, then the _____
 Name of the P.S. _____ District _____

6. Complainant / Informant :
 (a) Name Sri Bipinath Roy
 (b) Father's / Husband's Name 1r Khushimohan Roy
 (c) Date / Year of Birth _____ (d) Nationality Indian
 (e) Passport No. _____ Date of Issue : _____ Place of Issue _____
 (f) Occupation _____
 (g) Address Wanga Apartment, Flat No - 500, Mangal Pandey Road, P. Sujan
Bazar PS - Sujan Dist. Dooars

7. Details of known / suspected / unknown accused with full particulars
 (Attach separate sheet, if necessary)
① Sri Sajjan Agarwal ② Smt. Savita Agarwal ③ Sri
Sankar Ghosh ④ Smt. King Ghosh ⑤ Sri Kuldeep Choudhary
⑥ Sri Joydeep Choudhary ⑦ Kajal Sankar

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) : The Original written complain of
the complainant which is treated as FIR is
reproduced overleaf.

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 Tulas Kanti Mandal 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
complain.

14. Signature / Thumb impression of the Complainant / Informant _____
 Signature of the Officer-in-Charge, Police Station 29/01/2026
 Name Katna Sajjan Das Officer-in-Charge
 Rank : No. SI Siliguri Police Station
Siliguri Police Commissionerate

15. Date & Time of despatch to the court : _____

Date: 29.01.26

To,

The Inspector In-Charge,

New Jalpaiguri Police Station,

Dist. Jalpaiguri.

Sir,

I, Sri Gopinath Roy, son of Late Khushimohan Roy, resident of Ganga Apartments, Flat No. 504, Mangal Pandey Road, Khalpara, Siliguri, Post Office: Siliguri Bazar, Police Station: Siliguri, District: Darjeeling, Pin Code: 734005 along with my wife Smt. Radha Roy and my son Sri Gourav Roy state that we are the absolute owners of land individually acquired by us totalling to 18 Katha 6 Chattaks 8 Sq. ft. (more or less), appertaining to and forming part of R.S Plot No. 458, 458/1441 & 458/1442, Corresponding to L.R. Plot No. 140, Recorded in R.S. Khatian No. 296/8 & 298 Corresponding to L.R. Khatian No. 385, 383 & 597, of Mouza - Dabgram, of R.S. Sheet No. 15 Corresponding with the L.R. Sheet No. 173, under P.S. - Bhaktinagar (Presently New Jalpaiguri), Ward no. 32 of S.M.C., in the District of Jalpaiguri (hereinafter referred to as the "said land"). We had acquired our respective lands by way of executing respective Deeds of Conveyance which have been duly registered in the office of Additional District Sub Registrar, Bhaktinagar.

I would like to inform you that since 27.08.2025, some antisocial persons namely, Sri Sajjan Agarwal, Son of Late Radheshyam Agarwal; Smt. Sarita Agarwal, Wife of Sri Sushil Agarwal both residents of Punjabi Para, Post Office and Police Station: Siliguri, District: Darjeeling; Sri Sankar Ghosh, Son of Late Gour Chandra Ghosh, Smt. Rina Ghosh, Wife of Sri Sankar Ghosh, both resident of Mahananda Para, Post Office and Police Station - Siliguri, District - Darjeeling; Sri Kuldeep Chowdhury, Son of Late Mangtaram Chowdhury and Sri Joydeep Chowdhury, Son of Late Mangtaram Chowdhury, both residents of 3rd Mile, Sevoke Road, Post Office and Police Station - Siliguri, District - Darjeeling, Pin -- 734001 along with their men and persons were looking for an opportunity to grab my land and were making attempts to grab my land in different ways but they could not succeed in their attempts due to our resistance.

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Thereafter, a complaint was also lodged on 29.08.2025 and later, a specific case has been stated on the basis of the said complaint being NJP P.S. Case No. 607/2025.

That again on 31.08.2025, the above said antisocial persons along with their associates again attempted to forcibly enter the land to erect a temporary structure with the intent to illegally grab the property, but due to resistance by the petitioners they failed and instead threatened to falsely implicate the petitioners in criminal cases.

Subsequently, I along with my wife and son have filed a suit for declaration, injunction and other consequential reliefs along with an injunction application against said persons Sri Sajjan Agarwal, Smt. Sarita Agarwal, Sri Sankar Ghosh, Smt. Rina Ghosh, Sri Kuldeep Chowdhury, and Sri Joydeep Chowdhury before the Ld. Civil Judge, Junior Division, 1st Court at Jalpaiguri being Title Suit No. 598 of 2025.

That, after hearing our Ld. Advocate, the Ld. Court was pleased to order an injunction dated 02.09.2025 in our favour, stating that "The defendants restrained from interfering with the peaceful possession of the Plaintiffs over the suit property till the next date" i.e on 22.09.2025.

Thereafter, on the intervening night of 02.09.2025 and 03.09.2025 at about 01:00 A.M. at night, the said Sri Sajjan Agarwal, Smt. Sarita Agarwal, Sri Sankar Ghosh, Smt. Rina Ghosh, Sri Kuldeep Chowdhury, and Sri Joydeep Chowdhury along with their men, forcefully entered into our land with an earthmover machine (JCB) bearing registration no. WB 74 BS 0725 and a dumper and started changing the nature and characteristics of my property by removing the boundary wall along with its foundation and taking away the rubble in the dumper and digging, levelling and damaging our land thereby, ousting us from the possession of the said land. When I protested, they abused us and threatened to kill me and my family.

That on 06.09.2025 when at around 06:30 PM I went to our said land and saw that the whole land is covered by parking number of oil tankers and has obstructed even the entrance and exit of the land; the registration numbers of the tankers are WB 69 7204, WB 73 H2277, WB 73 H2488, WB 73 H1755. All the said tankers belong to KS Logistics, KS Group owned by one business man Kajal Sarkar who is also in collusion with the above-named persons.

I would like to further inform you that the Ld. Civil Judge Junior Division had modified its order dated 02.09.2025 and had directed to maintain status quo to both the parties and they have also appeared in the said Title Suit and all the orders passed by the Ld. Court are within their knowledge.

That on 14.09.2025 at about 11:00 A.M., upon receiving information from local persons, I found that the abovenamed antisocial persons had removed the existing tin gate and were preparing to install an iron gate with the help of labourers, in clear and wilful violation of the order passed by the Ld. Court.

Several written complaints were lodged before you but no action narrating the above incidents but since no action was being taken, we were compelled to file a writ petition before the Hon'ble High Court at Calcutta, Circuit Bench at Jalpaiguri being W.P.A. No. 2012 of 2025 (Gopinath Roy & Ors. -vs- State of West Bengal & Ors.). On 24.09.2025, after hearing Ld. Advocates of all the parties, the Hon'ble High Court, inter alia, directed as follows:

"In the meantime, police authorities would see that there is no breach of peace amongst the parties. To that effect, proper steps be taken by the police authorities."

It is also pertinent to mention here that the order of the Ld. Civil Judge, Junior Division, Jalpaiguri directing the parties to maintain the status quo was extended from time to time and the same was lastly extended on 19.12.2025 and is in force till 06.02.2026.

I would like to further inform you that on 28.01.2026, at around 03:00 P.M., I received an information from the local residents that some illegal activities are going on in our said land and I immediately rushed there and found that a Truck being vehicle no. NL 01 L1757 is dumping garbage and thousands of used plastic bottles and cans ie BIOMEDICAL WASTE MATERIALS, WHICH ARE HAZARDOUS TO HUMAN HEALTH, on the said land by a person who claimed that he is doing so on the direction of Sri Sajjan Agarwal, Smt. Sarita Agarwal, Sri Sankar Ghosh, Smt. Rina Ghosh, Sri Kuldeep Chowdhury, Sri Joydeep Chowdhury and their associate Kajal Sarkar, owner of K.S. Group, Sevoke Road, Siliguri.

Gopinath Roy

That the above persons are creating nuisance in and over our said land and also violating the *status quo* order of the Ld. Civil Judge, Junior Division, Jalpaiguri passed in connection with Title Suit No. 598 of 2025.

Under the above circumstances, I humbly request you to kindly take immediate action against said Sri Sajjan Agarwal, Smt. Sarita Agarwal, Sri Sankar Ghosh, Smt. Rina Ghosh, Sri Kuldeep Chowdhury, Sri Joydeep Chowdhury and their associates including Kajal Sarkar and also take appropriate steps to stop further illegal activities of the said persons and ensure strict compliance orders of the Hon'ble Courts.

Thanking you.

Yours faithfully,

Gopinath Roy

Sri Gopinath Roy 29-01-2026

Son of Late Khushimohan Roy,
Resident of Ganga Apartments, Flat No. 504,
Mangal Pandey Road, Khalpara, Siliguri,
Post Office: Siliguri Bazar, Police Station:
Siliguri,

District: Darjeeling, Pin Code:
734005 Mobile No. 82401-72773

- Enclo:
1. Photocopy of the Orders of Ld. Civil Judge Junior Division at Jalpaiguri passed in T.S. No. 598/2025 along with the copy of Plaint.
 2. Solemn order of the Hon'ble High Court dated 24.09.2025.
 3. Photographs dated 28.01.2026.

Copy to: The Commissioner of Police, Siliguri Police Commissionerate, for his kind information and necessary action.

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Received on 29/01/26 vide NWP
PS BDE No 1628 Dt 29/01/26
and started a specific case
vide NWP PS Case No 40/26
Dt 29/01/26 U/S 329(3)/223(3)(5)
of BNS and endorsed to SI
Tushar Kanti Mondal for its
investigation.

29/01/2026