



P.S. Bagdogra Year 2021 FIR No. 111/2021 Date 18/03/2021  
 Sections 406/420/409/120B Act. x Sections x  
 Sections x (iv) Others Acts & Sections x

3. (a) Occurrence of Offence : Day 17.05.2013 Date To x  
 Time Period not mentioned Time From x Time To x

(b) Information received at P.S. Date 19.03.2021 Time 16.35 hrs

(c) General Diary Reference : Entry No(s) 1041 Time 16.35 hrs

4. Type of Information : Written / Oral

5. Place of Occurrence : (a) Direction and Distance from P.S. Beat No.

(b) Address A land measuring 12.77 acres in Mouza Bara, Mohansingh Pargana, Patharghata P.S. Maligara, Dist. Darjeeling

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

Name of the P.S. x District x

6. Complainant / Informant :

(a) Name Anupam Ghosh

(b) Father's / Husband's Name Dr. Ranjit Ghosh

(c) Date / Year of Birth x (d) Nationality Indian

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

(f) Occupation x

(g) Address Dr. Rajendra Prasad Sarani, Dangi para, Siliguri, P.O. & P.S. Siliguri, Dist. Darjeeling

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

(Attach separate sheet, if necessary) :

1) Sri Sankar Ghosh, s/o of Gour chandra Ghosh of Dr. Rajendra Prasad Sarani, Dangi para, Siliguri, P.O. & P.S. Siliguri, Dist. Darjeeling 2) Smt. Sangita Bhattacharya w/o of Krishnendu Bhattacharya of 95, Nivedita Road, P.O. & P.S. Pradhannagar Dist. Darjeeling 3) Directors and Office bearers of Symbiosis Nirman Private Limited.

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

not mentioned

9. Particulars of properties stolen / involved (Attach separate sheet, if necessary) :

10. Total value of properties stolen / involved Does not arise

11. Inquest Report / U.D. Case No., if any Does not arise

12. FIR Contents (Attach separate sheets, if required) :

The Original written complain of the complainant which is treated as FIR 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 SI Kartick ch. Saikar to take up

investigation / refused investigation / transferred to P.S. x 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.

14. Signature / Thumb impression

of the Complainant / Informant

Noted is an Original complain

15. Date & Time of despatch to the court :  
20/03/2021 at 10-00 hrs

BDR P.S. DR NO. 1254/21

Old 20.03.2021

Signature of the Officer-in-Charge 19/03/2021

Name : J. V. Lepcha

Rank : No. 9 of Police

Old BDR PS, SP

Officer-in-Charge  
 Bagdogra P.S. Station  
 Siliguri Police Commissionerate





To,  
The Officer -in - charge,  
Bagdogra Police Station,  
Siliguri.

Dated- 19.03.2021

**Subject:** Written Complaint against

1. **Sri Sankar Ghosh,**
2. **Smt. Sangita Bhattacharya and**
3. **Directors and office bearers of Symbiosis Nirman Private Limited**

for forgery relating to making of false documents, valuable security for the purpose of cheating, criminal breach of trust by agent, impersonation, criminal conspiracy etc.

Sir,

I, **Sri Anupam Ghosh**, son of Late Ranajit Ghosh, Resident of Dr. Rajendra Prasad Sarani, Dangipara, Siliguri, Post Office and Police Station- Siliguri, District- Darjeeling, Pin - 734001 do hereby lodge this complaint against 1) Sri Sankar Ghosh, Son of Late Gour Chandra Ghosh, Resident of Dr. Rajendra Prasad Sarani, Dangipara, Siliguri, Post Office & Police Station: Siliguri, District- Darjeeling, Pin - 734001 2) Smt. Sangita Bhattacharya, Wife of Late Krishnendu Bhattacharya, Resident of 95, Nivedita Road, Pradhan Nagar, Siliguri, P.O. & P.S. Pradhan Nagar, District- Darjeeling, Pin - 734003 and 3) Symbiosis Nirman Private Limited, a private limited company incorporated under the Companies Act having its registered office at 95, Nivedita Road and their associates to the effect as follows:

Received on 19/03/21  
at 16:35 hrs vide BOR  
PS GORE NO- 1041, Dt-  
19/03/2021 and BOR  
PS case NO- 111/2021,  
Dt- 19/03/2021, u/s-  
406/420/409/120 B  
It has been registered  
and endorsed to SI  
Kartick Ch. Sankar for its  
investigation

1. That one Sri Subodh Roy, Sri Tapan Biswas, Sri Sankar Ghosh (Accused no.1) and my father Sri Ranajit Ghosh @ Ranjit Ghosh purchased and acquired total land measuring **12.77 acres** in Mouza - Bara Mohansingh, Pargana - Patharghata,

*Anupam Ghosh*  
19/03/2021.  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissionerate



under Matigara Police Station, District- Darjeeling each having 33%, 33%, 17% and 17% shares respectively vide 13 registered deeds of sale being document nos. 4538, 4539, 4540, 4555, 4556, 4557, 4584, 4585, 4586, 4587, 4637, 4638 and 4639 all for the year 1982 duly registered in the office of the Sub-Registrar at Siliguri from one Santok Singh Bains and Dhanwat Singh Bains morefully described in the Schedule 'A' herein below.

2. That vide the aforesaid purchase the said Sri Subodh Roy (33%), Sri Tapan Biswas (33%), Accused No.1 Sri Sankar Ghosh (17%) and my father **Sri Ranajit Ghosh @ Ranjit Ghosh (17%)** became the absolute joint owners of said land measuring **12.77 acres** having permanent, heritable and transferable right, title and interest in the said land and a Deed of Declaration being document no. **4672 for the year 1982** duly registered in the Office of the Sub-Registrar at Siliguri was also made to that effect by the said vendors Santok Singh Bains and Dhanwat Singh Bains in favour of Sri Subodh Roy, Sri Tapan Biswas, Accused No.1 Sri Sankar Ghosh and my father Sri Ranajit Ghosh @ Ranjit Ghosh.
3. That by way of the said Purchases as mentioned in the above paragraphs, my father Sri Ranajit Ghosh became the absolute owner of the said Land to the extent of **2.1079 acres or 127.527 kathas** out of the said land measuring about 12.77 acres being the 17% of 12.77 acres.
4. My father namely **Ranjit Ghosh @ Ranjit Ghosh died on 26.12.1998** leaving behind my mother Smt. Mita Ghosh (now deceased), my elder brother Sri Rathin Ghosh, myself (Sri Anupam Ghosh) and my grandmother Smt. Priyabala Ghosh (now deceased) as his only legal heir who jointly inherited 17% share of 12.77 acres of the said land i.e., **2.1079 acres or 127.527 kathas** approximately.

Ghosh

Anupam

Officer-in-charge  
Bagdogra P.S.

19/03/2021  
District Police Commissioner




5. That again after the demise of my father Sri Ranajit Ghosh @ Ranjit Ghosh, the said 2.1079 acres was equally divided amongst the 4 legal heirs as stated above herein and each legal heirs became the absolute owner of **0.52 acres approximately i.e., 31.46 kathas** approximately out of said land 2.1079 acres out of the said 12.77 acres of said land.

6. That during the lifetime of my mother Smt. Mita Ghosh, myself, my brother Sri Rathin Ghosh and my mother jointly executed a **Registered General Power of Attorney on 17.09.2002 entered in Book I Vol no. IV in pages 73 to 78 being document no. 78 for the year 2003** in favour of Accused no.1 Sri Sankar Ghosh and by virtue of the said Power of Attorney the Accused no.1 Sri Sankar Ghosh had the authority to deal with only 1.76 acres of land out of the said 2.1079 acres as mentioned in the said Power of Attorney, my mother Smt. Mita Ghosh had only given 0.57 acres, my brother Sri Rathin Ghosh had given 0.55 acres and myself (Sri Anupam Ghosh) had given 0.64 acres. **That in the said Power of attorney it was specifically stated that in case of any transfer of land by sale, the consideration shall be made over to us. However, till date no consideration had been made over to any of us or in favour of our deceased mother when she was alive by Accused No.1 Sankar Ghosh. It is pertinent to mention here that in the said power of attorney the Sri Krishnendu Bhattacharya (now deceased) who was the husband of Accused no.2 Smt. Sangita Bhattacharya was a witness and was very well conversant with the particulars of the land in question.**

Ghosh

Anupam

  
19/03/2021  
Officer-in-charge  
Bagdogra P.S.  
District Police Commissioner

7. My mother **Smt. Mita Ghosh died intestate on 08.05.2006** leaving behind myself (Sri Anupam Ghosh) and my brother Sri Rathin Ghosh as her only legal heirs. **That after the death of my mother the said Power of Attorney dated 17.09.2002**



executed in favour of Accused no.1 Sri. Sankar Ghosh, stood terminated and/or revoked as the said Power of Attorney was jointly given by us and our mother Smt. Mita Ghosh and no new/fresh power of attorney was ever executed by myself (Sri Anupam Ghosh) and my brother Sri Rathin Ghoshin in favour of Accused no.1 Sri. Sankar Ghosh after the demise of my mother. **It is pertinent to be mentioned here that Accused no.1 Sri Sankar Ghosh being our uncle/ full blooded brother of my father Sri Ranajit Ghosh @ Ranjit Ghosh was well aware of the death of my mother and was residing in the same house at the time of death of my mother Smt. Mita Ghosh and further attended her Shradh Ceremony.** It is pertinent to be mentioned here that my grandmother viz; Priyabala Ghosh died 20.06.2012 leaving behind Smt. Jyosna Ghosh (daughter), myself (Anupam Ghosh) and my brother Sri Rathin Ghosh (sons of predeceased son i.e., Ranajit Ghosh @ Ranjit Ghosh), Sri Bijay Ghosh (son), Sri Sankar Ghosh (son/accused no.1), Sri Sasti Ghosh (son), Smt. Malati Ghosh (daughter) as her only legal heir.

8. That after the demise of my grandmother her share of 0.52 acres of land devolved upon the aforementioned legal heirs entitling us a further share of **0.086 acres or 5.20 kathas** approximately out of our grandmother's share of 0.52 acres.
9. That from the aforesaid facts and circumstances it is crystal clear that I and my elder brother Rathin Ghosh became absolute owners of land measuring **1.646 acres approximately (0.52 + 0.52 + 0.52 + 0.086)** which is equivalent to **99.583 kathas** of land approximately morefully described in Schedule 'B' herein.

*Anupam Ghosh*  
*19/03/2021*  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissionerate

10. That it is pertinent to mention here that I and my elder brother Rathin Ghosh are in exclusive physical possession of **21.85 kathas (22 kathas approximately)** of land out of the total




land measuring 12.77 acres appertaining to L.R. Plot No. 1492 (0.07 acres) corresponding to R.S. Plot No. 926, L.R. Plot No. 1493 (0.01 acres) corresponding to R.S. Plot No. 927, L.R. Plot No. 1496 (0.21 acres) corresponding to R.S. Plot No. 923 and L.R. Plot No. 1497 (0.08 acres) corresponding to R.S. Plot No. 925 within Mouza – Baramohan Singh, J.L. No. 71 (which is morefully described in the Schedule- “C” herein below) and is in continuous khas and physical possession of said land.

11. That on 24.12.2020 Sri. Krishnendu Bhattacharya, the husband of Accused No.2 i.e., Smt. Sangita Bhattacharya committed suicide and it was alleged by the Accused no. 2 that due to pressure of my brother Rathin Ghosh to transfer the aforesaid 22 kathas of land, her husband was compelled to commit suicide and a specific criminal case started against my brother under section 306 of IPC.

12. That on coming to know about such false, frivolous and baseless case, I and my elder brother Rathin Ghosh started searching the Registry Office situated at Bagdogra under your police station and was bamboozled to find out that the Accused no.1 Shankar Ghosh being hand in gloves with Accused no.2 Sangita Bhattacharya, deceased Krishnendu Bhattacharya and their associates hatched up a criminal conspiracy to illegally dispose off our share of land thereby transferring the same in the name of Accused no.2, deceased Krishnendu Bhattacharya and fake companies floated by accused no.2 Sangita Bhattacharya and deceased Krishnendu Bhattacharya. It is pertinent to mention here that on 26.02.2021, while I and my brother were enquiring in the Registry office at Bagdogra, it came to our knowledge that Accused no.1 Sankar Ghosh sold in total **6.85 kathas of land out of the said 12.77 acres by a registered deed of sale dated 30.03.2004 registered on 02.04.2004 being document no. 3797 for the year 2005 entered in Book No.**

Gurdev

Anupam

  
19/03/2021  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissioner's Office



I, Volume No. 96, Pages 339 to 354 using the said Power of Attorney given by us and our mother i.e., since deceased Smt. Mita Ghosh in favour of Accused no. 2 Smt. Sangita Bhattacharya. It is pertinent to mention here that we nor our mother had received any consideration from the said accused no. 1 Sri. Sankar Ghosh till date.

13. That on further searching, on 05.03.2021 it was found by myself and my brother Rathin Ghosh that the accused no. 1/Sankar Ghosh, Smt. Sarita Devi Agarwal, Sajjan Agarwal, Rina Ghosh, Rahul Ghosh had transferred/sold **15 Kathas of land** approximately out of the said 12.77 acres of said land by **2 (Two) Registered deed of sale dated 15<sup>th</sup> December, 2011 being document nos. 10043 and 10045 for the year 2011** in favour of Symbiosis Nirman Pvt. Ltd represented by its Director Sri. Krishnendu Bhattacharya i.e. husband of accused no.2 Smt. Sangita Bhattacharya. That after the said registration of the said two sale deeds, accused no. 1/Sankar Ghosh executed and registered **2 (Two) declaration deed dated 17.05.2013 being document nos. 00425 and 00428 for the year 2013** thereby incorporating the said revoked Power of Attorney dated 17.09.2002 using the name of the deceased mother Mita Ghosh, my brother Rathin Ghosh and myself incorporating the names of my deceased mother and ourselves in the array of the Vendors in the said Two Sale Deeds as stated above.

14. That it is pertinent to mention here that from the period of **2001 to 2006, my elder brother was in New Zealand pursuing his career as a commercial flight pilot.**

*Anupam Ghosh*  
*19/03/2021*  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissionerate


15. That the accused persons being very well conversant with the fact that my mother Smt. Mita Ghosh died on **08.05.2006** and as such the Power of attorney executed by her died its natural death with the death of my mother,



falsely created forged documents relating to making of false documents, valuable security for the purpose of cheating, criminal breach of trust by agent, impersonation, criminal conspiracy etc. and thereby misappropriating atleast 5 crore of Rupees (Rs.5 crores) being the value of the land we are in possession of. I am anticipating that these accused persons being the conspirators of the entire obnoxious chapter might have further misappropriated the revoked power of attorney for their illegal pecuniary gain and could have made more illegal transfers and the same can only be unearthed after proper investigation by your kind office. I strongly believe that as the entire obnoxious plan of these accused persons was about to be get revealed and would have reached the public domain the Sri Krishnendu Bhattacharya, husband of the accused no.2 Smt. Sangita Bhattacharya committed suicide out of fear of getting penalised heavily by Court of law thereby which could have extended to ten years imprisonment and would have led to social stigma. It is pertinent to mention here that I along with my brother in order to protect our ownership and possession over this **22 kathas of land** filed a **Civil Suit before the Ld. Civil Judge Senior Division at Siliguri being Title (Declaration) Suit No. 32 of 2021** and accordingly in a case arising out of the said suit an order was passed in **Misc. appeal No. 02 of 2021 before the Ld. District Judge, Darjeeling** who was pleased to grant an interim injunction dated 12.03.2021 **restraining the accused persons from creating third party interest in respect of the said property by way of sale, mortgage or lease.**

Anugam  
Gharh

16. It is perceptible that a huge racket is being operated by the accused person, whereby means of forging documents as well as by adopting corrupt tactics; they have duped people like us.

  
19/03/2021  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissionerate



Please be kind enough to investigate the matter and arrest the accused persons and bring to light the truth in the interest of justice.

Thanking You.

Anupam Ghosh

Sincerely,

Anupam Ghosh

Son of Late Ranajit Ghosh

Resident of Dr. Rajendra Prasad Sarani

Dangipara, P.O. and P.S.: Siliguri,


District: Darjeeling.

9932878119

**SCHEDULE 'A'**

All that piece and parcel of land measuring about 12.77 acres forming part of 0.26 acres of land purchased vide Deed of Sale being no. 4538 of 1982 (0.11 acres in Plot No. 919, 0.15 acres in Plot No. 943), 0.20 acres of land purchased vide Deed of Sale being no. 4539 of 1982 (0.10 acres in Plot No. 939, 0.02 acres in Plot No. 946, 0.07 in Plot No. 937 and 0.01 acres in Plot No. 926), 0.28 acres of land purchased vide Deed of Sale being no. 4540 of 1982 (0.28 acres in Plot No. 912), 0.17 acres of land purchased vide Deed of Sale being no. 4555 of 1982 (0.17 acres in Plot No. 910), 0.55 acres purchased vide Deed of Sale being no. 4556 of 1982 (0.32 acres in Plot No. 914, 0.11 acres in Plot No. 918, 0.075 acres in Plot No. 942), 0.695 acres of land purchased vide Deed of Sale being no. 4557 of 1982 (0.075 acres in Plot No. 942, 0.35 acres in Plot No. 917, 0.10 acres of land in Plot No. 907, 0.17 acres in Plot No. 909), 0.49 acres of land purchased vide Deed of Sale being no. 4584 of

Anupam Ghosh

  
19/03/2021  
Officer-in-charge  
Bagdogra P.S.  
Darjeeling Police Commissionerate



Anupam Ghosh

1982 (0.31 acres in Plot No. 935, 0.18 acres in Plot No. 929), 0.66 acres of land purchased vide Deed of Sale being no. 4585 of 1982 (0.16 acres in Plot No. 919, 0.11 acres in Plot No. 916, 0.39 acres in Plot No. 915), 0.70 acres of land purchased vide Deed of Sale being no. 4586 of 1982 (0.70 acres in Plot No. 938), 3.43 acres of land purchased vide Deed of Sale being no. 4587 of 1982 (0.87 acres in Plot No. 922, 0.10 acres of land in Plot No. 923, 0.10 acres in Plot No. 924, 0.61 acres in Plot No. 940, 0.24 acres of land in Plot No. 911, 0.48 acres in Plot No. 944, 0.24 acres in Plot No. 908 and 0.79 acres in Plot No. 913), 2.50 acres of land purchased vide Deed of Sale being no. 4637 of 1982 (1.20 acres in R.S. Plot No. 939, 0.16 acres in Plot No. 946, 0.12 acres in Plot No. 927, 0.83 acres in Plot No. 937, 0.04 acres Plot No. 936, 0.06 acres in Plot No. 925, 0.09 acres in Plot No. 936), 1.62 acres of land purchased vide Deed of Sale being no. 4638 of 1982 (0.21 acres in Plot No. 939, 0.02 acres in Plot No. 927, 0.22 acres in Plot No. 928, 0.04 acres in Plot No. 946, 0.14 acres in Plot No. 937, 0.01 acres in Plot No. 925, 0.02 acres in Plot No. 926, 0.96 acres in Plot No. 934), 1.26 acres of land purchased vide Deed of Sale being no. 4639 of 1982 (0.47 acres in Plot No. 921, 0.41 acres in Plot No. 920, 0.38 acres in Plot No. 941) situated within Mouza: Baramohan Singh, Pargana: Patharghatta, J.L. No. 96, Touzj no. 91, Police Station: Matigara, District: Darjeeling.

#### SCHEDULE 'B'

All that piece and parcel of land measuring about 99.58 acres or 1.646 acres out 12.77 acres forming part of Plot No. 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 946 situated within Mouza: Baramohan Singh, Pargana: Patharghatta, J.L. No. 96, Touzj no. 91, Police Station: Matigara, District: Darjeeling.

  
11/9/03/2021  
Officer-in-charge  
Bagdogra P.S.  
Siliguri Police Commissionerate



### SCHEDULE 'C'

All that piece and parcel of rayati land, measuring about 0.361 acres or 21.85 kathas (**22 Kathas approximately**) out of 99.58 acres or 1.646 acres ("B" Schedule Property), appertaining to forming part of L.R. Plot No. 1492 (0.07 acres) corresponding to R.S. Plot No. 926, L.R. Plot No. 1493 (0.01 acres) corresponding to R.S. Plot No. 927, L.R. Plot No. 1496 (0.21 acres) corresponding to R.S. Plot No. 923 and L.R. Plot No. 1497 (0.08 acres) corresponding to R.S. Plot No. 925 situated within Mouza - Baramohan Singh, J.L.No. 71, P.O. & P.S. Matigara, District: Darjeeling under Matigara Gram Panchayat.

The said land is butted and bounded as follows:

North	:	12 feet wide private road;
East	:	House of Dr. Bidyut Goswami;
West	:	16 feet wide PWD Road followed by Asian Highway;
South	:	10 feet wide private kutchra road.

*Anupam Ghosh*  
  
19/03/2021  
Officer-in-charge  
Bardagra P.S.  
Siliguri Police Commissionerate