

# FIRST INFORMATION REPORT

(Under Section 154 Cr. P.C.)



1. Dist. Darjeeling P.S. Siliguri Year 2021 FIR No. 1423/21 Date 19.12.2021  
 2. Act Spc Sections 406/420/465/468/471/120 B Sections 4023

(i) Act 406/420/465/468/471/120 B Sections 4023  
 (ii) Act 406/420/465/468/471/120 B Sections 4023  
 (iii) Act 406/420/465/468/471/120 B Sections 4023  
 (iv) Others Acts & Sections

(a) Occurrence of Offence : Day 12/05/2021 Date From 12/05/2021 Date To

Time Period NOS mention Time From NOS mention Time To

(b) Information received at P.S. Date on 19.12.2021 Time 20.15 hrs.

(c) General Diary Reference : Entry No(s) 1185 Time 20.15 hrs.

4. Type of Information Written / Oral

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

(b) Address Branati Apartment, Master da Lane, Ashrapara, PS - Siliguri, Dist. Darjeeling.

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

6. Complainant / Informant :

(a) Name Smt. Mournita Das

(b) Father's / Husband's Name W/o Sri Jitu Das, D/o Sri Manik Ghosh

(c) Date / Year of Birth 1971 (d) Nationality Indian

(e) Passport No. 1185 Date of Issue 12/05/2021 Place of Issue Darjeeling

(f) Occupation Branch Manager of Bandhan Bank, Siliguri

(g) Address Branati Apartment, Master da Lane, Ashrapara, PS - Siliguri, Dist. Darjeeling.

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

(Attach separate sheet, if necessary) :

(i) Sri Sanjay Ghosh (ii) Sri Sankat Ghosh both s/o Sri Manik Ghosh

of 97/1, Ramkrishna Road, Telephone Exchange, PS - Siliguri, Dist. Darjeeling and (iii) Branch Manager of Bandhan Bank, Siliguri

Branch, 78 Raja Ram Mahan Roy Road, W/NO-12, Hakimpura, PS - Siliguri, Dist. Darjeeling.

8. Reasons for delay in reporting by the Complainant / Informant Dist. Darjeeling.

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

Rs. 2,02,50,000/- (Two crore two lacs fifty thousand) only being

A/c No. 50160013944568 & 9 (nine) numbers of fix deposits.

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 Complaint of the Complainant is treated as FIR which 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 Rana Brahma of Siliguri PS/SPC to take up investigation / refused investigation / transferred to P.S. Siliguri 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

15. Date & Time of despatch to the court : on 20/12/2021 at 10.30 hrs.

19/12/2021

Signature of the Officer-in-Charge, Police Station

Name : Raja Chetri

Rank : SI of Police

Siliguri Police Commissionerate

To,  
**THE OFFICER-IN-CHARGE,**  
Panitanki More Outpost,  
(Under Siliguri P.S.)  
Siliguri, District-Darjeeling.

Date : 19/12/2021

**SUBJECT:** Written Complaint.

Dear Sir,

I, **SMT. MOUMITA DAS**, W/o. Sri Jitu Das, D/o. Sri Manik Ghosh, resident of Pranati Apartment, Master Da lane Ashrampara, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001 is lodging this written complaint against **SRI SANJOY GHOSH**, **SRI SAIKAT GHOSH** and the Branch Manager, Bandhan Bank, Siliguri Branch, 78, Raja Ram Mohan Roy Road, Ward No.-12, Hakim Para, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001 on the following facts hereunder :

*Moumita Das*

1. That myself, **SRI SANJOY GHOSH** (Accused No. 1) and **SRI SAIKAT GHOSH** (Accused No. 2) are siblings by full blood and I am the married daughter, the Accused no. 1 is the elder son and the Accused No. 2 is the youngest son of **SRI MANIK GHOSH**, S/o. Late Atindra Chandra Ghosh, resident of 97/1, Ramkrishna Road, Telephone Exchange, Siliguri, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001 respectively.
2. That our mother namely Soma Ghosh (since deceased) and our father Sri Manik Ghosh was having a Savings Bank Account lying with Bandhan Bank, Siliguri Branch, 78, Raja Ram Mohan Roy Road, Ward No.-12, Hakim Para, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001 being S/B A/c. No. 50160013944568 since 2016.
3. That though the aforesaid account was a joint account but actually our mother namely Soma Ghosh (since deceased) maintained and operated the said account. However from the savings amount lying in the aforesaid S/B A/c. No. 50160013944568 9(Nine) numbers of fixed deposits was created in the name of our father **SRI MANIK GHOSH** amounting to Rs. Rs. 2,02,50,000/- (Rupees Two Crore Two Lacs Fifty Thousand) only.
4. That since April, 2020 our father Sri Manik Ghosh is in complete bed rest due to multiple organ failure and fracture and absolutely and completely incapable to move and run day to day affairs of the family as well as unable to understand the contents of any documents or the significance and consequence of anything at all.
5. That on 12.05.2021, our mother namely Soma Ghosh died due to septic shock with multi organ failure leaving behind me and my two brother i.e., accused no. 1 & 2 and our father Sri Manik Ghosh as her only legal heir and successors to inherit her property and at the time of her death an amount of Rs. 78,00,000 /- (Rupees Seventy Eight Lacs) only was lying in the aforesaid S/B A/c. No. 50160013944568 excluding the 9(Nine)

*Received on 19.12.21 at 19.35 hrs. vide Panitanki T.O. No. 499/21 dt. 19.12.21 and forwarded to 1/c Siliguri P.S. to start a specific case under proper section of Cr. P.C. and Bank Manager will investigate the case.*

*Officer in Charge  
PANITANKI T.O.  
Siliguri  
Dist. Darjeeling*

numbers of Fixed Deposits amounting to Rs. 2,02,50,000/- (Rupees Two Crore Two Lacs Fifty Thousand) only.

6. That after the demise of our mother, I being a responsible daughter looked after my ailing father i.e., Sri Manik Ghosh with utmost care, sympathy and caution as far as possible.
7. That I have my own family consisting of my husband, two sons so practically it is impossible for me to look after our ailing father i.e., Sri Manik Ghosh all the time and come and stay with him throughout all the day and taking the undue advantage of loneliness and helplessness the Accused No. 1 & 2 put tremendous pressure and started inflicting mental torture upon the our father i.e., Sri Manik Ghosh to put his signature in different kind of documents and papers which I learned when I came to my parental house to see my ailing father i.e., Sri Manik Ghosh. It is important to mention here that the Accused no. 1 & 2 by posture and gesture made an impression that they dislike my frequent visit in my parental house but I ignored all these things because my only aim was to properly look after my ailing father i.e. Sri Manik Ghosh.
8. That when I asked Accused no. 1 & 2 for so doing the Accused no. 1 & 2 told me that for medical treatment of our father Sri manic Ghosh huge amount is required which they cannot afford and to continue with the medical treatment money is required and to withdraw the same from the aforesaid account they took thumb impressions of our father in some withdrawal slip of the bank. It is worthy here to mention that the Accused no. 1 & 2 are so suspicious that they installed CCTV in the bedroom of our father i.e., Sri Manik Ghosh to watch out my movement when I came there to see my father.
9. That I became very anxious about the welfare of my father i.e., Sri Manik Ghosh and went to the Branch office of Bandhan Bank to enquire about the state of affairs of the savings account lying with Bandhan Bank and also about the Fixed Deposits lying with them in the name of Sri Manik Ghosh and asked for a statement of account from Branch Manager, Bandhan Bank, Siliguri Branch, i.e, Accused No. 3 but Accused no. 3 bluntly refused to give the same to me.
10. That through personal enquiry it came to my knowledge that Accused no. 2 in collusion with Accused No. 1 and Accused No. 3 inducted his name in the aforesaid savings account as co-holder along with our father Sri Manik Ghosh though the fact remains the aforesaid account was basically maintained and operated by our mother namely Soma Ghosh(since deceased) during her lifetime and after her demise I am also entitled to inherit 1/4th share of our mother's asset including the amount lying with bank i.e. Accused no. 3.

Moumita Das.

Moumita Das.

11. That the Accused no. 3 is well aware of the fact that our father Sri Manik Ghosh is seriously ill and unable to move and is not sound enough mentally and physically to understand anything at all but still the Accused no. 3 in collusion with Accused no. 1 & 2 send it's official representative in the house our father Sri Manik Ghosh to obtain his thumb impression in the consent form to induct the name of Accused no. 2 in the aforesaid savings account bypassing and by keeping me in dark which is not expected from a reputed bank and Accused no. 3 did the same for his wrongful gain causing wrongful loss to my father.
12. That I also came to know that the Accused No. 2 had made premature withdrawal of 9(Nine) numbers of Fixed Deposits amounting to Rs. 2,02,50,000/- (Rupees Two Crore Two Lacs Fifty Thousand) only stands in the name our father Sri Manik Ghosh and thereafter invested the said amount under Fixed Deposit scheme in the name of Accused No. 1,2,& their wives and the Accused No. 3 is fully aware of the fact and allowed Accused No. 2 to make abnormal/unusual withdrawal of such huge sum from the Fixed Deposits account our father Sri Manik Ghosh without making any verification and without complying the banking guidelines and laws. It is worthy here to mention that the name of Accused No. 2 was inducted as co-holder of the aforesaid S/B A/c. No. 50160013944568 on 11.06.2021 and 8(Eight) numbers of Fixed Deposits total amounting to Rs. 1,80,00,000/- (Rupees One Crore Eighty Lacs) only was withdrawn on 11.06.2021 and 1(One) number of Fixed Deposit amounting to Rs. 22,50,000/- (Rupees Twenty Two Lacs Fifty Thousand) only was withdrawn on 19.06.2021 and invested under Fixed Deposit scheme in the name of Accused No. 1,2 & their wives.
13. That the amount withdrawn from the Fixed Deposit accounts of our father Sri Manik Ghosh is transferred and invested under Fixed Deposit scheme and the account number of the said Fixed Deposits are as follows:
  - I. Fixed Deposit being No. 10210004900940.
  - II. Fixed Deposit being No. 10210004693617.
  - III. Fixed Deposit being No. 10210004693547.
  - IV. Fixed Deposit being No. 10210004693417.
  - V. Fixed Deposit being No. 10210004693297.
  - VI. Fixed Deposit being No. 10210004693267.
  - VII. Fixed Deposit being No. 10210004693177.
  - VIII. Fixed Deposit being No. 10210004693017.

It is important to mention here that the aforesaid amount was invested under 9(Nine) numbers of Fixed Deposit scheme but I could collect only 8(Eight) numbers.

14. That after induction of the name of accused No. 2 in the aforesaid savings account being S/B A/c. No. 50160013944568 on 11.06.2021 the amount withdrawn from the said account was as follows :

SL. NO.	DATE	PARTICULARS	AMOUNT
1)	03.07.2021	Fund Transferred to Accused No. 2	Rs.5,90,440/-
2)	03.07.2021	Fund Transferred to wife of Accused No. 1	Rs.1,00,000/-
3)	07.07.2021	Fund Transferred to Accused No. 2	Rs.7,00,000/-
4)	01.09.2021	Fund Transferred to Accused No. 1	Rs.50,000/-
5)	01.09.2021	Fund Transferred to Accused No. 1	Rs.3,00,000/-
6)	03.09.2021	Fund Transferred to Accused No. 1	Rs.32,082/-
7)	22.09.2021	Self Withdrawal by Accused No. 2	Rs.15,000/-
8)	23.09.2021	Self Withdrawal by Accused No. 2	Rs.10,000/-
9)	01.10.2021	Fund Transferred to Accused No. 1	Rs.50,000/-
10)	01.10.2021	Fund Transferred to Accused No. 1	Rs.32,082
11)	18.10.2021	Fund Transferred to Accused No. 2	Rs.14,300/-
12)	18.10.2021	Fund Transferred to Accused No. 2	Rs.15,000/-
13)	21.10.2021	Fund Transferred to Accused No. 2	Rs.5,50,000/-
14)	21.10.2021	Fund Transferred to Accused No. 2	Rs.1,00,000/-
15)	21.10.2021	Fund Transferred to Accused No. 2	Rs.58,680/-
16)	21.10.2021	Fund Transferred to Accused No. 2	Rs.5,00,000/-
17)	01.11.2021	Fund Transferred to Accused No. 2	Rs.51,740/-
18)	01.11.2021	Fund Transferred to Accused No. 1	Rs.32,082/-
19)	22.11.2021	Fund Transferred to Accused No. 2	Rs.3,27,024.31/-
20)	25.11.2021	State Bank Deposit	Rs.3,66,274/-
21)	03.12.2021	Fund Transferred to Accused No. 1	Rs.32,082/-
22)	03.12.2021	Fund Transferred to Accused No. 2	Rs.3,66,274/-
<b>TOTAL</b>			Rs.42,93,060.31/-
<b>(Rupees Forty Two Lacs Ninety Three Thousand Sixty and Thirty One Paise) only</b>			

Moumita Das.

15. That it is my firm belief that the accused no.1 and 2 in collusion with accused no.3 withdrawn the aforesaid amount by forging the signature of my father Sri Manik Ghosh.
16. That the Accused Persons above named herein have been trying to clandestinely dispose off the amount lying in the aforesaid savings account of my father for their wrongful gain in different manners.
17. That accused no.1 & 2 stays in the same house with my father at 97/1, Ramkrishna Road, Telephone Exchange, Siliguri, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001 and did the act of forgery, criminal breach of trust, cheating in the said house in my absence and in collusion with the Branch Manager, Bandhan Bank, Siliguri Branch, 78, Raja Ram Mohan Roy Road, Ward No.-12, Hakim Para, P.O. & P.S.-Siliguri, Dist.-Darjeeling, PIN-734001.
18. That from the acts and conducts of the accused persons it became crystal clear to me that the accused persons hatched up a deep rooted criminal conspiracy in order to cheat. Defraud my father. They also criminally misappropriated the aforesaid huge amount and also commits criminal breach of trust. So Sir, I shall be highly obliged if you kindly take necessary legal steps in this regards & do the needful accordingly. Due to time spend for gathering the information, there was some delay in lodging this complaint.

Thanking you.

Copy forwarded to :

- Commissioner of Police,  
Siliguri Police  
Commissionerate,  
Siliguri, Dist.-Darjeeling

Yours truly,

Moumita Das.  
(SMT. MOUMITA DAS)  
Phone No. 95939-37573

Received on 19/12/2021 at 20.15 hr.  
vide SCS PS SDB no. 1185 Dr. 19/12/21  
Standard Siliguri PS Case no. 1423/21  
dt. 19/12/2021 U/s 406/420/465/468/471/  
120 B IPC & endorsed to SI Rana  
Brahma of Siliguri PS/SPC (Panitanki Top)  
for its investigation.

19/12/2021  
Inspector in Charge  
Siliguri Police Station  
Siliguri Police Commissionerate