

IN THE COURT OF HON'BLE XV METROPOLITAN MEGISTRATE,
CYBERABAD, MEDCHAL.

C.C.No. OF 2015

BETWEEN:

Smt. V.Dhana Laxmi, W/o V.Raj Kumar,
Aged about 47years, Occ: House hold,
R/o H.No.288/6/5/1A,
Anand Bagh, Malkajgiri, Hyderabad.

...Complainant

AND

1.Uppala Sridhar, S/o. Narsaiah,
Aged about: 39 yrs, Occ: Business,
R/o H.No. 10-22, Gajwel Village & Mandal,
Medak Dist.

2.Jeedipalli Ram Reddy, S/o Narayana Reddy,
Aged about: 62 yrs, Occ: Business,
R/o. H.No.3-49, Turkapalli Village,
Shameerpet Mandal, R.R.Dist.

3. Aakula Krishna Murthy, S/o. Late Vittal,
Aged about: 46yrs, Occ: Business,
R/o. Plot No. 180/A,
Old Vasavi Nagar Karkhana,
Secunderabad.

4. B.Sathya Narayana, S/o Narsaiah
Aged about: 58yrs, Occ: Business,
R/o. Turkapalli Village,
Shameerpet Mandal, R.R.Dist.

5. G.Sanjeeva S/o Kistaiah
Aged about: 57yrs, Occ: Business,
R/o. Kolthur Village,
Shameerpet Mandal, R.R.Dist.

...Accused No. 1 to 5

**MEMORANDUM OF COMPLAINT FILED UNDER SECTION 200 R/W
190 OF Cr.P.C For the Offences U/S 406,420,468,471 AND 506.**

- | | |
|-----------------------|---|
| 1. Nature of offence. | : 406,420,468,471 & 506 of IPC |
| 2. Place of offence. | : Murhadipalli Village, Yadaram
Gram Panchayath, Medchal
Mandal, R.R.Dist, |
| 3. Date of Offence | : 28-12-2006, 10-12-2007,
10-12-2014, there after it arose
continuously. |
| 4. Police Station | : Murhadipalli Village, Yadaram
Gram Panchayath, Medchal
Mandal comes under
Police limits of Medchal,
Medchal Police Station having
Police Limits. |

...contd... 2

V. Dhana Lakshmi



Murhadipalli Village, Yadaram Gram Panchayath, Medchal Mandal is within the limits of Medchal Police Station and Medchal Police Station is comes under Jurisdiction of this Hon'ble Court.

6. Witnesses.

: 1. Rajkumar

2. S.Balanarsaiah.

1. The complainant herein humbly submits that accused No.1 to 5 herein claimed that they are the absolute owners of land bearing Sy.No.50/Part admeasuring AC.1.00 gts situated at Murhadipalli Village, Yadaram Gram Panchayath, Medchal Mandal, Ranga Reddy Dist, by virtue of their purchase from Atluri Rajendra Prasad through a registered Sale Deed bearing document No. 29100/2006 dated 21-12-2006 registered at SRO Medchal, R.R.Dist.

2. The Complainant further submit that all the accused No.1 to 5 offered for sale of the above said land to the complainant for total sale consideration of Rs. 51,50,000/- (Fifty One Lakhs Fifty Thousand) the complainant accepting their offer of sale of above said land for said sale consideration. An amount of Rs. 42,00,000/- (Forty Two Lakhs) as advance as part sale consideration to the accused towards purchase of land bearing Sy.No.50/Part admeasuring AC.1.00 gts situated at Murhadipalli Village, Yadaram Gram Panchayath, Medchal Mandal, Ranga Reddy Dist, in simple installments. And at the time of advancing simple installments that complainant used to take receipts of payments from the accused.

3. The Complainant further submit that after receiving 42,00,000/- (Forty Two Lakhs) from the complainant entered in to agreement of sale deed with the complainant on 28-12-2006 that the complainant after paying the advance and part sale consideration was getting ready to pay a balance sale consideration and to fulfill her part of contract meanwhile the complainant received a legal notice on 10-12-2007 from V.Rajashekar on behalf of his client K.Bangaraiah stating that K.Bangaraiah is the owner and the possessor of land bearing Sy.No. 50/Part admeasuring AC.6.00 gts situated at Murhadipalli Village, Yadaram Gram Panchayath, Medchal Mandal, Ranga Reddy Dist, that after receiving the legal notice from K.Bangaraiah the complainant got informed the accused about the legal notice, the accused assured that complainant that they would clear cloud casts upon the title and the claim of K.Bangaraiah by the end of January 2008 and promised the complainant that if they fails to clear the title and the claim of K.Bangaraiah they would return Rs.42,00,000/- received by them with an interest 36% P.A from the date of receiving the amount till the repayment of amount received.

The Complainant further submit that she waited for the accused to get the title cleared and the claim of K.Bangaraiah but accused were sleeping over the matter there upon the complainant got issued legal notice calling upon the accused to act upon the agreement and their promise.

5. The Complainant further submit that the accused after receiving legal notice came to the complainant and sort further time for getting the property cleared from the claim of K.Bangaraiah thereafter accused never cared and came forward to clear the claim of K.Bangaraiah and also not returned Rs. 42,00,000/- received by them from the complainant.

6. The Complainant further submit that waiting for more than Two years Nine months after January 2008 for the accused response and promise made by them about returning of Rs.42,00,000/- with interest 36% p.a. and after got received legal notice on 9-10-2010 calling upon the accused to return the amount of Rs.42,00,000/- but have failed to respond nor come forward to return the amount received by them.

7. The Complainant further submit that the K.Bangaraiah have filed a suit against this accused and obtained Decree and Judgment in OS.No.136 of 2010 and with perfected his right over the property sold by accused to the complainant, and said K.Bangaraiah is in peaceful possession and enjoyment over the property.

8. The Complainant further submit that the accused have issued the complainant in to the sale transaction without having proper title upon the property offered for sale and cheated the complainant of her amount accused are with holding the amount of Rs. 42,00,000/- (Forty Two Lakhs) since 28-12-2006 and or neither conveying the proper nor returning the amount received by the accused with an interest as such with holding the amount of the complainant for continued period and not settling the issue involved in the property their by the accused cheated the complainant to an amount of Rs.42,00,000/- (Forty Two Lakhs).

9. The Complainant further submit that the agreement of sale executed by accused is void and fraudulent document with an intension to deprive the complainant for an amount of Rs.42,00,000/- (Forty Two Lakhs). It is not out of place to mention that this complainant has filed a suit for recovery of amount of Rs.42,00,000/- (Forty Two Lakhs) was partially Decreed due to some technicalities vide OS.No.710 of 2010.

10. The Complainant further submit that the accused deceitfully brought in to existence agreement of sale and with that created document on non-existing land and using law of breach of trust and for cheating and deprived the personnel reputation in the society which punishable under section 406,420,468 and 506 of IPC.

11. The Complainant further submit that the property situated at Murhadipalli Village, Yadaram Gram Panchayath, Medchal Mandal, Ranga Reddy Dist, is with in the Jurisdiction of this Hon'ble Court this comes under Medchal Police Station is with in the limits of this Hon'ble court.

...contd...4

V. Dhanalakshmi

17-6-15
PRAYER:- The Complainant therefore respectfully prays that this Hon'ble Court may kindly consider the above said matter and refer the case concern Police for enquiry and report or else take cognizance of offence and punish the accuse as per law.

Date: 17-06-2015

Place: Medchal

V. Dhanalakshmi
COMPLAINANT.

[Signature]
COUNSEL FOR COMPLAINANT.

LIST OF DOCUMENTS

1. Agreement of Sale Deed dated 28-12-2006
2. Oppandam. dt. 11-1-10
3. Copy of Legal Notice dt. 17/7/2009
4. Set of Postal Receipts
5. Another Legal Notice dated 09-10-2010
6. Postal Acknowledgements
7. Postal Acknowledgements
8. Postal Acknowledgements
9. Postal Acknowledgements
10. Cash Receipts dt. 9/3/07.
11. Cash Receipts dt. 15/2/07
12. Cash Receipts dt. 26/2/07
13. Cash Receipts dt. 13/2/07
14. Cash Receipts dt. 23/12/06
15. Copy of Decree and Judgment in O.S. No. 136 of 2010 of K. Bangaloreiah.

Date: 17-06-2015

Place: Medchal

V. Dhanalakshmi
COMPLAINANT.

[Signature]
COUNSEL FOR COMPLAINANT.

IN THE COURT OF HON'BLE XV
METROPOLITAN MAGISTRATE,
CYBERABAD, MEDCHAL.

C.C.No. OF 2015

BETWEEN:

Smt. V.Dhana Laxmi

...Complainant

AND

Uppala Sridhar and Others

...Accused No. 1 to 5

MEMORANDUM OF COMPLAINT
FILED UNDER SECTION 200 R/W
190 OF Cr.P.C For the Offences
U/S 406,420,468,471 AND 506.

Filed on: 14/06/2015

Filed by: Counsel for Complainant

M/s

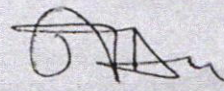
BURMA CHAKRA PANI
(E.No-AP.112/1992)
J.ASHOK KUMAR
M.PADMA PRIYA
SK.KALEEM PASHA

ADVOCATES - MEDCHAL.

MEMO OF EVIDENCE IN CR. NO. 396/2015 U/s 406,420,468,471 IPC &

156(3) CRPC OF PS MEDCHAL.

1	Smt V.Dhana Laxmi W/o V.Raj Kumar, aged:47 yrs , Occu; House hold,R/o H.No.2488/6/5/1A, Anand bagh , Malkajgiri , Hyd-bad	Complainant.
2	Sri. V.Raj Kumar S/o Late Anjaiah,aged:52 ys, Occ: Business, R/o H.No. 24-6-5/A1,Anand bagh Malkajgiri, RR district	Husband of complainant
3	Sri, K Shashank Reddy Inspector of Police of PS Medchal.	Issued FIR.
4	G. Ramulu, Sub-Inspector of Police of PS Medchal, Cyb.	Recorded the statement of LW's 1 and 2 and 1 st IO
5	R.Veerabrahmam, Sub-Inspector of Police of PS Medchal, Cyb.	Filed the charge sheet and 2 nd IO


Sub-Inspector of Police,
P.S.Medchal.



2-1486/11

2015/11

CHARGE SHEET

(Final Result U/s.173 Cr.P.C.,)

CC 329/16

01	CYBERABAD Commnrt., P.S. MEDCHAL.	Year: 2015, FIR. No. 396/2015 Dated: 07.07.2015
02	Final Report No.	03. Dated:
04	Act. I.P.C.	Sections: 406,420,468,471,506 IPC & 156(3) CRPC
05	Type of Final Result.	Charge sheet.
06	If Final Report....result.	----
07	If Supplementary or Original.	Original.
08	Name and rank of I.Os.,	G. Ramulu, Sub-Inspector of Police, Medchal PS. 1 st IO. R.Veerabrahmam, Sub-Inspector of Police, Medchal PS. 2 nd IO.
09	Name of complainant/informant.	Smt V.Dhana Laxmi W/o V.Raj Kumar, aged:47 yrs , Occu; House hold,R/o H.No.2488/6/5/1A, Anand bagh , Malkajgiri , Hyd-bad
10	Dt. on which complt. was informed of the final result.	
11	Details of property seized/recovered during the investigation and relied upon.	----
12	Name of Accused Charge sheeted.	A1. Uppala Sridhar S/o Narsaiah ,aged:39 yrs ,occu: Bussiness ,R/o H.No.10-22, Gajwel (Vlg & Mandal) of Medak Dist. A2. Jeedipally Ram Reddy S/o Narayana Reddy ,aged:62 yrs , occu: Bussiness, R/o H.No.3-49, Turkapally Vlg,Shamirpet mandal of RR Dist. A3. Aakula Krishna Murthy S/o Late Vittal ,aged:46 yrs , Occu: Bussiness ,R/o Plot No.180/A, Old Vasavi Nagar Karkhana ,Sec-bad. A4. B.Sathya narayana S/o Narsaiah, aged:58 yrs ,Occu: Bussiness ,R/o Turkapally Vlg,Shamirpet Mandal of RR Dist. A5. G.Sanjeeva S/o Kistaiah, aged:57 yrs , Occu: Bussiness ,r/o Koltur Vlg ,Shamirpet mandal of RR Dist. (Issued notice U/sec. 41(A)CrPC on the accused persons A1 to A5 on 30.01.2016 and released them)
13	Name of accused NOT charged including suspected.	
14	List of witnesses to be examined.	Memo of evidence is enclosed
15	If FR is false, action taken/to be taken u/s.182/211 I.P.C.,	----
16	Result of Laboratory Analysis.	----
17	Brief facts of the case:-	Mentioned below

**IN THE COURT OF THE HON'BLE XV METROPOLITAN MAGISTRATE AT
MEDCHAL, CYBERABAD.**

Honoured Sir,

The facts of the case are that accused persons A-1 U.Sridhar A-2 J. Rami Reddy A-3 A.Krishna Murthy A-4 B.Satyanarayana and A-5 G.Sanjeeva approached the complainant Smt.V.Dhanalaxmi and offered her to dispose the said land for Rs 51,50,000/- and by promising that there are the absolute owners of land Acr-1 in Sy.No.50/part situated at Muraharipally, Yadaram Gramapanchayati vide sale deed doc No.29100/2006 dt:21.12.2006 registered at SRO Medchal purchased from A.Rajendra Prasad. Believing their version she paid Rs.42 lakhs as advance and obtained receipts of payments from them with a condition to re-pay the remaining amount in simple installments. Later the accused persons made an agreement of sale deed with her on 28.12.2006 while so she received a legal notice from V.Rajashekhar on behalf of his client K.Bangaraiah that he is the absolute owner of the said land. Immediately she informed the same to the accused persons then the accused promised that if they fail to clear the claim of Bangaraiah they would return her amount of Rs.42 lakhs but so far the accused persons neither they had clear the claim of Bangaraiah nor returned her amount. In this connection K.bangaraiah filed a suit against the accused persons and obtained decree and judgment in favor of Bangaraiah. The accused persons A-1 to A-5 who are intentionally having an idea created fraudulent document and with their ulterior motive deprived personal reputation and cheated the complainant with Cr.Br. of trust. Hence she requested to take necessary action against them as per law.. Hence FIR.

As per the directions of the Hon'ble Court the LW-03 has registered a case in Cr.No. 396/2015 U/s 406,420,468,471,506 IPC & 156(3) CRPC and entrusted the investigation to LW-04.

During the course of investigation, LW-04 examined and recorded the detailed statements of LW- 1 which incorporated in case diary Part II. Thereafter the LW-04 asked the LW-01 to provide connected documents pertaining to this case in order to prove the allegations leveled against the accused persons and who in turn informed that he will provide same soon. Later he visited the scene of offence situated at Yadaram (V) along with LW- 1 and caused enquiry in to facts of the case and also came to know through the LW-02 husband of the LW-01 that the accused persons A1 to A5 met with the LW-01 and insisted her to purchase the land ac. 1 which belongs to them and by promising that they purchased the said land from one Rajendra Prasad. Upon that the LW-01 purchased the said land from them by paying Rs.42 lakhs to them as advance and entered in to agreement of sale deed. Later the A1 to A5 failed to execute agreement of sale deed to LW-01. Then the LW-04 examined recorded the statement of LW-02 in part-II CD and promised to take legal action against the A1 to A5. Thereafter the LW-04 made efforts to trace out the above said alleged accused persons at their residences, but they were found absent.

While so the LW-05 received the case file as per the instruction of the superiors. Upon that the LW-05 have made efforts and traced the accused persons A1 to A5 and issued notice U/sec. 41(A) CRPC to the accused persons A1 to A5.

From the facts and evidence collected during the course and investigation it is well established that the LW's 1 and 2 wife and husband. The accused persons A1 to A5 who are intentionally having an idea to cheat the LW-01

The facts of the case are that accused persons A-1 U.Sridhar A-2 J. Rami Reddy ,A-3 A.Krishna Murthy ,A-4 B.Satyanarayana ,and A-5 G.Sanjeeva approached the complainant Smt.V.Dhanalaxmi and offered her to dispose the said land for Rs 51,50,000/- and by promising that there are the absolute owners of land Acr-1 in Sy.No.50/part situated at Muraharipally ,Yadaram Gramapanchayati vide sale deed doc No.29100/2006 dt:21.12.2006 registered at SRO Medchal purchased from A.Rajendra Prasad. Beleaving their version she paid Rs.42 laksh as advance and obtained receipts of payments from them with a condition to re-pay the remaining amount in simple installments. Later the accused persons made an agreement of sale deed with her on 28.12.2006 while so she received a legal notice from V.Rajashekhar on behalf of his client K.Bangaraiah that he is the absolute owner of the said land. Immediately she informed the same to the accused persons then the accused promised that if they fail to clear the claim of Bangariaha they would return her amount of Rs.42 lakhs but so far the accused persons neither they had clear the claim of Bangaraiah nor returned her amount. In this connection K.bangaraiah filed a suit against the accused persons and obtained decree and judgment in favor of Bangariah. The accused persons A-1 to A-5 who are intentionally having an idea created fraudulent document and with their ulterior motive deprived personal repetition and cheated the complainant with Cr.Br. of trust. Hence she requested to take necessary action against them as per law.. Hence FIR.

As per the directions of the Hon'ble Court the LW-03 has registered a case in Cr.No. 396/2015 U/s 406,420,468,471,506 IPC & 156(3) CRPC and entrusted the investigation to LW-04.

During the course of investigation, LW-04 examined and recorded the detailed statements of LW- 1 which incorporated in case diary Part II. Thereafter the LW-04 asked the LW-01 to provide connected documents pertaining to this case in order to prove the allegations leveled against the accused persons and who in turn informed that he will provide same soon. Later he visited the scene of offence situated at Yadaram (V) along with LW- 1 and caused enquiry in to facts of the case and also came to know through the LW-02 husband of the LW-01 that the accused persons A1 to A5 met with the LW-01 and insisted her to purchase the land ac. 1 which belongs to them and by promising that they purchased the said land from one Rajendra Prasad. Upon that the LW-01 purchased the said land from them by paying Rs.42 lakhs to them as advance and entered in to agreement of sale deed. Later the A1 to A5 failed to execute agreement of sale deed to LW-01. Then the LW-04 examined recorded the statement of LW-02 in part-II CD and promised to take legal action against the A1 to A5. Thereafter the LW-04 made efforts to trace out the above said alleged accused persons at their residences, but they were found absent.

While so the LW-05 received the case file as per the instruction of the superiors. Upon that the LW-05 have made efforts and traced the accused persons A1 to A5 and issued notice U/sec. 41(A) CRPC to the accused persons A1 to A5.

From the facts and evidence collected during the course and investigation it is well established that the LW's 1 and 2 wife and husband. The accused persons A1 to A5 who are intentionally having an idea to cheat the LW-01

He deceived her and made false promises that they are the absolute owners of land admeas. 1 in Sy.No.50 at Yadaram (V), and they are intended to dispose the said land for sale consideration of Rs.51,50,000/-. The LW-01 who bluntly believed their version willing to purchase the same and paid Rs. 42 lakhs as advance and obtained receipts from them towards the said amount. Thereafter the victim received a legal notice on 28-12-2006 that the said land which the LW-01 unknowingly purchased from A1 to A5 is belonging to One K.Bangaraiah and also they are not the land owners. By knowing this the victim the LW-01 was shocked and consulted the A1 to A5 to settle the issue by showing said notice to them. Upon that the accused persons promised that they will return the said amount with 3% interest in case if they failed to register said land in favour of LW-01, after making settlement with land owner. Moreover the accused persons A1 to A5 given assurance to the victim LW-01 that they will get the litigation cleared by the end of Jan-2008 which was pending with its absolute owner K.Bangaraiah or else they will repay the above said amount which they receive from her in deceitful manner, but the accused person A1 to A5 did not making anything and avoiding whenever the victim trying to contact them. Besides this on psychical verification it is came to light that there was no land in the said Sy.No. Thus the accused A-1 to A5 who colluded which each other and who made false promises through they are not the owners of the above said land, caused huge loss to victim LW-01 and they have committed an offence punishable U/s 406,420,468,471,506 IPC & 156(3) CRPC.

Hence it is prayed the Hon'ble court may kindly conduct trail against the accused persons A-1 to A5 and punish them according to law.

Hence this charge sheet.


Sub-Inspector of Police,
PS Medchal, Cyb.

statement of LW-01 at 2
checked for crime
C.C./S.T.C.C. 379 A/14

Taken on as C.C./S.T.C.

Offence U.Sec. 406, 420, 468, 471, 506 IPC

against accused No. A1 to A5

Issue SS/NWB to accused No. A1 to A5

Call on 28/07/14

KVMM
10/2/14



28/07/14

28/07/14

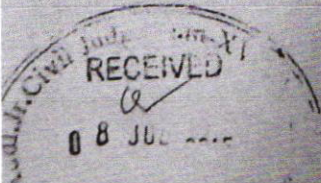


FIRST INFORMATION REPORT
(Under Section 154 and 157 Cr.P.C)

A.P.M. Orders 470,500

8/ 20716/118

1. District Cyberabad P.S. Medchel Year 2015 FIR No. 396/2015 Date 07/07/2015
2. Acts & Section(s): 406,420,468,471,506 IPC, 156(3) CrPC
3. a) Occurrence of Offence: Day _____ Date & Time From _____
Date & Time To _____ Prior To 10/12/2014 00:00 Time Period 0
- b) Information Received at P.S.: Date & Time 07/07/2015 18:30
- c) General Diary Reference: Entry No 2 Date & Time 07/07/2015 18:30
4. Type of Information: Written
5. Place of Occurrence:
- a) Distance and Direction From P.S. 15 Km, South-East Beat No. Beat Medchel 03
- b) Address Place Muraharipally yadaram Village Area/Mandal Medchal Street/Village Near Rajeev Rahadari
City/District Cyberabad State Telangana PIN 500001
- c) In case, outside the limit of this Police Station, then
Name of P.S. _____ District _____ Received on 8/7/15 at 10:40 hrs.
Through PC.No. 3826 of Medchal
Police Station _____
6. Complainant / Informant:
- a) Name Dhana Laxmi V
- b) Father's /Husband's V Raj kumar
- c) Date/Year of Birth _____ Age 47
- d) Nationality _____ e) Caste _____
- f) Passport No _____ Date of Issue _____ Place of Issue _____
- g) Occupation Housewife
- h) Address House No _____ Area/Mandal _____ Street/Village _____
2488/6/51A malkajgiri
City/District Cyberabad State Telangana PIN 500001
7. Details of known/suspected/unknown accused with full particulars:



Superintendent

8/ 20716/118
8/7/15

10. Total value of property stolen :

11. Inquest Report/ U.D. Case

12. Contents of the complaint / statement of the complainant or informant :

IN THE COURT OF THE HONOURABLE XV METROPOLITAN MAGISTRATE AT MEDCHAL, CYBERABAD
Honoured Sir,

Today i.e. On 07.07.2015 at 18:30 hours received a court referred complaint from Smt V. Dhana Laxmi W/o V.Raj Kumar, aged: 47 yrs, Occu; House hold, R/o H.No.2488/6/5/1A, Anand bagh, Malkajgiri, Hyd-bad, which reads as follows.

Brief Facts :- The facts of the case are that the accused persons A-1 U.Sridhar A-2 J. Rami Reddy ,A-3 A.Krishna Murthy ,A-4 B.Satyanarayana ,and A-5 G.Sanjeeva approached the complainant Smt.V.Dhanalaxmi and offered her to dispose the said land for Rs 51,50,000/- and by promising that there are the absolute owners of land Ac-1.00 gts in Sy.No.50/part situated at Muraharipally , Yadaram Gramapanchayati vide sale deed doc No.29100/2006 dt:21.12.2006 registered at SRO Medchal purchased from A.Rajendra Prasad. Believing their version she paid Rs.42 lakhs as advance and obtained receipts of payments from them with a condition to re-pay the remaining amount in simple installments. Later the accused persons made an agreement of sale deed with her on 28.12.2006 with so she received a legal notice from V.Rajashekhar on behalf of his client K. Bangaraiah that he is the absolute owner of the said land. Immediately she informed the same to the accused persons then the accused promised that if they fail to clear the claim of Bangaraiah they would return her amount of Rs.42 lakhs but so far the accused persons neither they had clear the claim of Bangaraiah nor returned her amount. In this connection K.bangaraiah filed a suit against the accused persons and obtained decree and judgment in favor of Bangaraiah. The accused persons A-1 to A-5 who are intentionally having an idea created fraudulent document and with their ulterior motive deprived personal repetition and cheated the complainant with Cr.Br. of trust. Hence she requested to take necessary action against them as per law.. Hence FIR.

Received On 07.07.2015 at 18:30 hours

As per the contents of the above complaint registered a case in Cr. No. 396/2015 U/S 406,420,468,471,506 IPC & 156(3) CRPC and entrusted the investigation to G.Ramulu SIP

Inspector of Police

PS Medchal, Cyb.

Copies submitted W/cs to

US

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