

To,
Senior Police Officer,
M. R. A. Marg Police Station,
Mumbai.

October 24, 2021

SUB: Request to register C.R. (F.I.R.) against **Mr. Sameer Wankhede, Ms. Pooja Dadlani, Sam, Mr. Prabhakar Sail, Mr. Manish Bhanushali and Kiran Gosavi** for the acts committed by them tantamounting to the offences, as contemplated under the provisions of Sections 384. Punishment for extortion, 388. Extortion by threat of accusation of an offence punishable with death or imprisonment for life, etc. 389. Putting person in fear of accusation of offence, in order to commit extortion and 120(B) (Punishment for Criminal Conspiracy) of Indian Penal Code, 1860 along with provisions of Section 13 of Prevention of Corruption Act and other relevant provisions of law.

Respected Sir / Madam,

I, undersigned Advocate Sudha Dwivedi, having office at 106, 1st Floor, 24B Rajabhadur Compound, Fort, Mumbai – 23, would like to bring it to your kind notice about a serious offence which was committed and the same is being swept under the carpet by the Officials involved either to save their official positions and/or avert any Inquiry or Investigation by any competent authority in the said issue.

The brief facts pertaining to the issue is enumerated below for your ready perusal.

The recent incident of raid conducted by the Narcotics Control Bureau, on the luxury ship "Cordelia Cruise" which was supposed to cover distance by sea from Mumbai to Goa. In the said Ship, several individuals were present, the famous or known individuals were present on Invitation from the Organizers whilst the rest were present because they had booked tickets from the Organizers. After passengers were allowed to board the Ship, acting on the information / tip about there being

Narcotic Substance present with the Individuals on board, the officials of Narcotic Central Bureau, Mumbai Zonal Office, headed by the Zonal Director Mr. Sameer Dnyandev Wankhede conducted a massive raid at the Cruise Ship on the intervening night of October 02, 202. After the raid, reportedly certain uncontrolled contrabands were seized by the officials and several persons were detained. One of them being Mr. Aryan Shahrukh Khan, a public figure, the same attracted attention of the Media Houses which started covering the proceedings which were being done and after several hours of conducting the raid, three individuals were brought to the Mumbai Zonal Office of the Narcotic Control Bureau.

Due to the inclusion of Mr. Aryan Shahrukh Khan, it was hugely covered by the Media, wherein it could be seen that, one individual seemingly an officer, was dragging and pushing Mr. Aryan Shahrukh Khan towards the building wherein the Zonal NCB Office is situated. It is subsequently revealed that the said official who was seen dragging Mr. Aryan Khan, is one Mr. Manish Bhanushali who is not at all any NCB Official but a party worker associated with a Political Party. Although a stand was sought to take by NCB that he was an informer but his actions of impersonating a government officer while dragging the suspected person etc were clearly in contravention with the law which has been laid down in this regard.

Another such incident came to light about a Selfie picture which was uploaded by one Kiran Gosavi ostensibly while he interrogating a suspect picked up in the said raid become viral on the social media. The said Selfie became talk of the town instantly as the suspect which was seen in it, as being interrogated, was none other than the Aryan Shahrukh Khan. It is very obvious that a person who has been detained by the officials of NCB will be left under the surveillance and watch of NCB Officials and not ordinary people. But subsequently it is revealed that the said Kiran Gosavi is not at all

any NCB Official but he is not even remotely connected with any of the offices of the state or central government. These illegal acts of Mr. Kiran Gosavi with the active help of other senior NCB Officials, of impersonating himself to be an NCB official of Mumbai Zonal Unit and thereafter interrogating the suspects of NDPS Act offences, keeping them in surveillance and clicking pictures with the detained suspects and uploading them on social media, are completely offensive.

There was an uproar created by the same and the NCB Mumbai Zonal Unit, has defended themselves by saying that Mr. Kiran Gosavi was acting as a Pancha in the said raid but it is pertinent to note that, the law which has been laid down with respect to Panchas and Panchnama is very clear and states that, there supposed to be two persons who are "respectable inhabitants of society" meant to be independent witnesses who should be present with the police during search and seizure. The two were to act as witnesses, to corroborate in writing, the things that are seized from the scene of offence. According to Section 100 (4) of the Code of Criminal Procedure Act, "The officer. shall call upon two or more independent and respectable inhabitants of the locality," However, In the current case, one of the two panchas, one has an offence already registered against him.

Now, it has been surfaced that, wherein Mr. Prabhakar Sail has clearly narrated the entire incident that, after the apprehension of Mr. Aryan Shahrukh Khan, wherein Mr. Gosavi alongwith Mr. Sameer Wankhede was present since the morning and the said Prabhakar Sail was handed over the duty to identify the said persons as and when they would arrive at the terminal and after which at night when the persons were apprehended, the said Prabhakar was informed that the persons have been apprehended. Mr. Gosavi was also present at the NCB Office along with Mr. Aryan Khan and was helping him speak on the phone and the video of the same was also

taken by the said Mr. Prabhakar Sail on his personal phone and the same is being shown in broadcasting news. Moreover, when the said Prabhakar Sail was called at the cruise to be a Panch, it was informed by him that he was made to sign 10 blank papers wherein the said Mr. Prabhakar even wasn't present with his Aadhar Card and his aadhar card number was just mentioned wherein he signed the said Blank Papers.

Mr. Kiran Gosavi called some person named Sam and asked him to arrange a meeting and settle the "entire issue for an amount of Rs. 25 crores and if they bargain then close it around Rs. 18 crores" and to which Sam agreed and called Ms. Pooja Dadlani who is the manager of Mr. Shahrukh Khan and a meeting was arranged wherein Sam was present and Mr. Kiran Gosavi was present and Ms. Pooja Dadlani arrived in a Mercedes Car wherein the discussion took place for around 15 minutes and after they left and Sam informed Mr. Gosavi that said Pooja isn't picking up the phone and after which Mr. Gosavi and Prabhakar left for Vashi and after reaching Vashi, Mr. Gosavi informed Prabhakar to go to Mahalaxmi and collect an amount of Rs. 50 Lakhs from some person and later update will be given. Wherein he reached near Indiana Hotel and the number of the car of 5102 and from there Mr. Prabhakar collected two bags and then left for Vashi and gave the bag to Mr. Gosavi and then Mr. Gosavi informed Mr. Prabhakar to give the bag to Sam who will meet near Trident Hotel and therein he handed over the bag amounting to Rs. 38 Lakhs to Mr. Sam and therefore, Mr. Gosavi is absconding and now Mr. Prabhakar is fearing his life from NCB Officials. The said fact has also been stated by Mr. Prabhakar on his Affidavit which is being annexed herewith for a better perusal of your office.

It is a matter of serious concern, that such a news and person who has been involved is coming before the news and giving such a statement wherein clearly cognizable offence is being made out, the pictures and the videos which are being

circulated make it amply clear that there is a huge conspiracy which is being done and is involved and it can clearly envisaged that NOW the apparent Investigation is nothing but a sham which is being done by NCB Officials who are involved.

That it is very apparent that now, based on the Affidavit that, the entire investigation would be nothing but a sham and flimsy investigation which is done apparently to bring down the image of the State Government, Bollywood Film Industry and the Anti – Narcotics Cell of the State Government who has been working tirelessly by seizing 'heroin' and not 'heroines'. Therefore, a proper investigation into the matter is very necessary as a single reading of the Affidavit is clear in envisaging that the said investigation is poorly conducted with a sole intention to extort monies by putting fear in the mind of Mr. Aryan Shahrukh Khan for commission of an actual offence wherein the punishment is 20 years or more.

The statement of the said Prabhakar clearly make it clear that, there was no recovery, the panchnama are false, fabricated and it was done with a clear intention for personal gains and with hand in gloves with NCB Mumbai Zonal Unit officials involved and for which proper investigation has to be done by your office, failing which, the criminal act of these people would boost their confidence and they can misuse the same to their personal gains. Further it would send a wrong message in the society that the Government affairs are no more remained sovereign affairs of the state and anyone can play with it. Therefore, the same has to be thoroughly interrogated to make sure that no other individual in future would even think about impersonating a public servant.

It is also hereby informed to your office that, it is a famous saying that 'One bad Fish can spoil the whole Pond'. The officials of the NCB which are involved in this issue had the duty to serve the public interest aspersions the statutory provisions of

law but these officials are in clear violation of the same and the indication seems to be that , they do not work for the public at large but probably for their own interest.

I categorically inform you that such willful acts of the accused to cheat and break the trust of the people at large is an act of cowardice and such people should be immediately and without any delay be taken into custody by registering an offence based on this present letter.

I categorically inform your august office that, the acts done hereinabove which have been narrated amounts to various offences, which have been duly mentioned above. It is in these premises; we request you request you to register C.R. (F.I.R.) against **Mr. Sameer Wankhede, Ms. Pooja Dadlani, Sam, Mr. Prabhakar Sail, Mr. Manish Bhanushali and Kiran Gosavi** for the acts committed by them tantamounting to the offences, as contemplated under the provisions of Sections Sections 384. Punishment for extortion, 388. Extortion by threat of accusation of an offence punishable with death or imprisonment for life, etc. 389. Putting person in fear of accusation of offence, in order to commit extortion and 120(B) (Punishment for Criminal Conspiracy) of Indian Penal Code, 1860 along with provisions of Section 13 of Prevention of Corruption Act and other relevant provisions of law.

I sincerely hope that your august office would consider my present complaint in the interests of justice. If no penal and appropriate lawful action has been initiated against culprits, the said culprits may follow the same modus operandi to do more offences in future with some other persons.

Thanking You in Anticipation.

Yours respectfully,

Sudha Dwivedi

C. C. To:

1. **Shri. Dilip Walse Patil**
Hon'ble Minister of Home Affairs
Mantralaya, Mumbai 400032.
2. **Commissioner of Police**
Mumbai Police
Main Bldg., 1st Floor, CP Office Compd. Dr. D N Rd., Mumbai 1
3. **Joint Commissioner of Police (Crime)**
Stone Bldg., 1st Floor, CP Office Compd. Dr. D N Rd., Mumbai 1
4. **Deputy Commissioner of Police, Zone - I,**
109, Valchand Hirachand Marg, 1st Floor, Opp. G.P.O., Fort,
Mumbai 400001
5. **Addl. C.P., Anti – Corruption Unit,**
Anti - Corruption Bureau, Maharashtra, 6th Floor, Sir
Pochkhanwala Road, Worli Police Camp, Worli, Mumbai 400 030.