

BEFORE THE HON'BLE COURT OF SMT RINKY AGNIHOTRI JMIC,
HOSHIARPUR

Sh. Karanvir Singh M94, P.S. 10000

CRN/23/2021

Case Registered in No. CRN/107/24
Case Filed in No. CRN/107/24
Case Heard on 05/10/24

1. Bhagat Hari Singh Charitable Trust Village Dadyal, Salla Khurd, Tehsil Garhshanker Dist
Hoshiarpur Through Sh Balwinder Singh Aged About 34 Years S/O Sh Sukhchain Singh R/O Vpo
Dadyal, Salla Khurd, Tehsil Garhshanker, Dist Hoshiarpur Official Power Of Attorney Of The

.....Complainant

V/S

1. Shamsher Singh Bhardwaj S/O Gurdish Singh R/O Hno 10, Arora Colony, Opp Shani Mandir, R-476
Kakkon, Dist Hoshiarpur-146001-Punjab
2. Deepak Chaudhary S/O Prem Dass R/O Hno 174, Street Number 1, Ward Number 5,
Hoshiarpur, 146001, Pb

.....Accused

(Complaint To Issue Directions To Competent Authority To Register Fir Against
Accused Number 1 And 2 For Offences Done As Explained)

Respectfully Shown:

ATTESTED

05 DEC 2024

05 DEC 2024

CNR No: PBHO030001072024

CIS No: CRM/23/2024

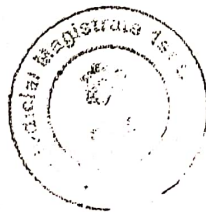
BHAGAT HARI SINGH CHARITABLE TRUST THROUGH
BALWINDER SINGH VS SHAMSHER SINGH BHARDWAJ etc.

Present: Sh. SATBIR SINGH Advocate for the complainant.

Arguments has been heard of learned counsel for applicant/complainant for issuance of directions to the opposite party to registered the FIR against the party. The contents of the application are not narrated here for sake of brevity as the same is part of judicial record. Regarding the action to be taken against accused No.1 & 2, for the reasons mentioned in the application, it is relevant to mention that the application of Onkar Singh which was pending today titled as Onkar Singh Vs. Deepinder singh has already been dismissed vide separate detailed order as he has been declared proclaimed person and does not pursue the present application. Hence, present CRM has become infructuous has the action has already been taken against the accused persons. Hence, this CRM is disposed off. Papers of CRM be attached with the case titled as "Onkar Singh Vs. Deepinder Singh" and be consigned to the record room Hoshiarpur.

Date of Order: 10-10-2024
Anmol-stenographer

(Karanvir Singh Maju)
Judicial Magistrate - Ist Class
UID No. PB00423



Certified to be True Copy

Examiner

Authorised by Section 75 of
The Indian Evidence Act 1872

05 DEC 2024

No. of Application 10349
Date of Application 25/11/24
Name of Application Mphinder Sachdevs
Date of Preparation 25/12/24
Copying Fee 05
Urgent Fee
No. of Page 02
Name of Copyist Narmu
Compared by
Date of Delivery 25/12/24
Examiner



Bhagat Hashi Singh

4/2 Shamsur Singh 9

Statement of Balwinder Singh aged 34 years of
Sukhechar Singh of N. N. Dadia, Dist. Gashankar,
Distt. Hoshiarpur.

ON 8/11

stated that I have come present
in person before the Hon'ble Court as Complainant
I am serving as Manager of the Trust. The President
of the Trust namely Halki Singh has given me
power of attorney registered at C. Sub Registrar,
Tehsil Gashankar, Distt. Hoshiarpur. I have present
a petition for strict action against Deepak Chaudhary
and Shamsur Singh Bhadwaj for the offences as
explained in the present petition, Advocate Salbir
Singh will be my Counsel in the present petition.
I wish to proceed and succeed in the present

Petitioner
Roshan

P. D. Singh

Certified to be True Copy

Examiner

Authorised by Section 2 of
The Indian Evidence Act, 1973

Rinky Agnihotri
Civil Judge (Junior Division)-num
Judicial Magistrate 1st Class
Hoshiarpur

05 DEC 2024



BEFORE THE HON'BLE COURT OF SMT RINKY AGNIHOTRI JMIC,
HOSHIARPUR



Sh. Karanvir Singh Mayra, PS 12271
CRM/23/202
Date Registered in No. CRM/107/24
Case Filing No. CRM/107/24
Case No. 3000/27/2024

Sh. Balwinder Singh Charitable Trust Village Dadyal, Saila Khurd, Tehsil Garhshanker Dist
Hoshiarpur through Sh Balwinder Singh Aged About 34 Years S/O Sh Sukhchain Singh R/O Vpo
Dadyal, Saila Khurd, Tehsil Garhshanker, Dist Hoshiarpur Official Power Of Attorney Of The

.....Complainant

V/S

1. Shamsher Singh Bhardwaj S/O Gurdish Singh R/O Hno 10, Arora Colony, Opp Shani Mandir,
Kakkon, Dist Hoshiarpur-146001-Punjab
2. Deepak Chaudhary S/O Prem Dass R/O Hno 174, Street Number 1, Ward Number 5,
Hoshiarpur, 146001, Pb

.....Accused

(Complaint To Issue Directions To Competent Authority To Register Fir Against
Accused Number 1 And 2 For Offences Done As Explained)

Respectfully Shown:

ATTESTED

Examiner

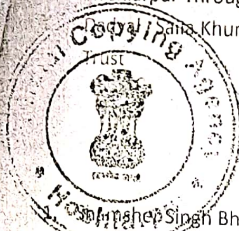
05 DEC 2024

BEFORE THE HON'BLE COURT OF SMT RINKY AGNIHOTRI JMIC,
HOSHIARPUR

In The Matter Of

Case Registration No. CRM/23/2024
Case Filing No. CRM/107/24
CHA 22400 3000/072024

1. Bhagat Hari Singh Charitable Trust Village Dadyal, Saila Khurd, Tehsil Garhshanker Dist Hoshiarpur Through Sh Balwinder Singh Aged About 34 Years S/O Sh Sukhchain Singh R/O Vpo Dadyal, Saila Khurd, Tehsil Garhshanker, Dist Hoshiarpur Official Power Of Attorney Of The



.....Complainant

V/S

Balwinder Singh Bhardwaj S/O Gurdish Singh R/O Hno 10, Arora Colony, Opp Shani Mandir, Rakken, Dist Hoshiarpur-146001-Punjab

CRM/23/24
DOI/6/11/24
DOD/16/10/24
R-496

2. Deepak Chaudhary S/O Prem Dass R/O Hno 174, Street Number 1, Ward Number 5, Hoshiarpur, 146001, Pb

.....Accused

(Complaint To Issue Directions To Competent Authority To Register Fir Against
Accused Number 1 And 2 For Offences Done As Explained)

Respectfully Showeth:

1. That The Complainant Namely Balwinder Singh Is A Duly Authorised Power Of Attorney Of The Trust Bearing Power Of Attorney Registered By Competent Authority At O/O Tehsildar Garhshanker Dist Hoshiarpur. The Copy Of Such Power Of Attorney Is Attached For Your Ready Reference As Annexure-1.
2. That The Complainant Balwinder Singh Is Competent To Invoke The Jurisdiction Of The Court In This Matter.
3. That The Complainant Balwinder Singh Is A Permanent Resident Of The Above Mentioned Address.
4. That Bhagat Hari Singh Charitable Trust Had Registered One Petition U/S 156 (3) Crpc With Title Onkar Singh Through Deepak Chaudhary V/S Deepinder Singh And Ors Regarding The Matters Of The Trust With Registration Number 190/2023. The Date Fixed For The Said Case Is 06-01-2024 & Pending Before The Same Present Court That Is The Court Of Jmic Hoshiarpur Smt Rinky Agnihotri. In The Said Case U/S 156 (3) Crpc The Accused Number 1 Namely Deepak Chaudhary Was Earlier Power Of Attorney. This Power Of Attorney Was Cancelled By The President Of The Trust Namely Sh Malkit Singh S/O Sh Hari Singh R/O Vpo Dadyal, Saila Khurd Tehsil Garhshanker Dist Hoshiarpur. The Power Of Attorney Of Deepak Chaudhary Was Cancelled Due To His Involvement In Unfair Means, Illegal And Unethical Activities And Various Other Unfair Means As Explained Below In The Present Petition.
5. That As On Date The Power Of Attorney Of Deepak Chaudhary Is Already Cancelled And The President Of The Trust Has Given Affidavit Along With Statement In The Court. Deepak Chaudhary Was Very Well Informed Regarding This Fact That His Power Of Attorney Has Got Cancelled And He Should Not Interfere In Any Affairs Of The Trust. The Manager Of The Trust And Power Of Attorney Holder At Present For Trust Namely Balwinder Singh Who Is Present Complainant Had Also Given Affidavit Along With Statement In The Court That Power Of Attorney Of Deepak Chaudhary Has Got Cancelled And The Trust Wishes To

ATTESTED

Examined
05 DEC 2024



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Withdraw The Said Case Due To Effect Of Compromise. The Trust Wishes To Withdraw
Case U/S 156 (3) Crpc.

6. That Accused Namely Shamsher Singh Bhardwaj Was The Counsel Of The Trust At The Time Of Filing Of Said Case. However Due To Professional Misconduct With Client By Advocate Shamsher Singh Bhardwaj, Misleading And Misrepresentation With Court By Advocate Shamsher Singh Bhardwaj, Involvement In Illegal Activities By Shamsher Singh Bhardwaj, Following Illegal, Unethical Means By Shamsher Singh Bhardwaj, The Trust Instructed Advocate Shamsher Singh Bhardwaj That The Trust Do Not Wants To Continue With Him. The Vakalatnama Given To Advocate Shamsher Singh Bhardwaj & Others Was Cancelled By The President Of The Trust And Manager Of The Trust. Other Offences Done By Accused Number 1 And 2 Are Explained Below In Detail.
7. That Each And Every Offence Is Done By Accused Jointly & Both Namely Deepak Chaudhary And Shamsher Singh Bhardwaj Are Equally Responsible For All Offences As Explained In The Present Complaint.
8. That It Is Specially Highlighted Here In The Complaint That Advocate Shamsher Singh Bhardwaj Being An Advocate Bear No Immunity To Any Provision Of Law And All Legal Remedies Shall Be Followed Against Him Like Any Other Citizen Of India. It Is Again Highlighted That Advocate Shamsher Singh Bhardwaj Bears No Immunity Towards Any Provision Of Law.
9. That Accused Number 1 And 2 Have Taken Away The Hard Earned Money Of The Trust At The Name Of Court Fee As Rs 3 Lakhs Were Taken At The Name Of Court Fee By Both Of Them. So Financial Fraud Is Done By Accused Number 1 And 2 Which Is An Offence U/S 406, 420 Ipc And Other.
10. That Both Accused Number 1 And 2 Are Pressurising The Trust For Paying More Money To Them And Claiming That They Have Spend Money For Unfair Means. Trust Never Instructed Them To Involve In Any Unfair Means. For This Purpose The Accused Number 1 And 2 Have Hired Criminal Type Of People. The Accused Number 1 And 2 Are Accused For Criminal Intimidation.
11. That Both Accused Number 1 And 2 Are Pressurising The Trust And Some Trustees Including Manager Of The Trust To Give False Evidence In The Court Which Is An Offence U/S 195-A Ipc And Relevant Sections As Per Laws In Force At The Present Time.
12. That Both Accused Number 1 And 2 Are Defaming The Trust Along With Trustees & Manager Of The Trust Namely Balwinder Singh Who Is The Present Complainant. This Act Of The Accused Falls In The Category Of 499, 500 Ipc And Relevant Sections As Per Laws In Force At The Present Time.
13. That Both Accused Number 1 And 2 Have Misrepresented And Mislead The Court Without Any Information Or Intimation To The President Or Manager Of The Trust. That Means To Say In The Present Civil Suit For Recovery There Are Several Misleading Things And Misrepresentations Which Were Not Instructed By The Trust Or Trustees Or Present Power Of Attorney Of The Trust Namely Balwinder Singh. Hence The Trust Do Not Owns Any Such Acts Of The Accused Number 1 And 2 Which Have Resulted In Misleading And Misrepresentation With The Court. It Is An Offence U/S 193, 196, 199, 209, 211 Ipc And Relevant Sections As Per Laws In Force At The Present Time.
14. That Accused Namely Shamsher Singh Bhardwaj Being An Advocate Severally Presented Documents In The Court Along With Said Petition U/S 156 (3) Crpc And At Several Other Times Which Were Not Instructed By The Client. Thus Accused Number 1 And 2 Did Their Best Effort To Instigate And Pump Up The Matter For Their Own Ulterior And Selfish

ATTESTED

05 DEC 2024

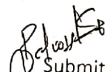


15 3
Motives. This Act Of The Accused Number 1 And 2 Is An Offence. At The Part Of Advocate Shamsher Singh Bhardwaj It Is A Fundamental Act Of Professional And Other Misconduct As Per Section 35 Of The Advocates Act. So Legal Proceedings Shall Be Initiated At State Bar Council Of Pb And Hr At Chandigarh For Permanent Cancellation Of The Practicing License Of Advocate Shamsher Singh Bhardwaj.

15. That Both Accused Number 1 And 2 Are Involved In Several Other Illegal And Unethical Practices. Advocate Shamsher Singh Bhardwaj And Deepak Chaudhary Are Thus Interfering Illegally In The Legal Affairs Of Bhagat Hari Singh Charitable Trust, Trustees & Manager Namely Balwinder Singh.
16. That Both Accused Number 1 And 2 Are Blackmailing The Trust, Trustees And Manager Of The Trust For Extracting More Money. They Do Not Wish To End Up The Litigation Of The Trust Due To Their Own Ulterior Motives.
17. That Both Accused Are Acting Illegally In The Petition U/S 156 (3) Crpc Filed By Trust And The Trust Has Entered Into Compromise In Such Matter.
18. That Both Accused Number 1 And 2 Have Done The Offence Intentionally, Severally And Repeatedly.
19. That The Present Court Has The Jurisdiction To Hear And Decide The Present Complaint.
20. That The Cause Of Action Arose On Date 12-Dec-2023 When All These Facts Came In The Knowledge Of The Trust, Trustees And Manager Of Trust.

Prayer : In View Of The Facts That Both Accused Namely Deepak Chaudhary And Shamsher Singh Bhardwaj With Particulars As Mentioned Above Have Done The Offences As Explained Above Intentionally, Repeatedly And Severally. Both Actus Reus And Mens Rea Are Present In The Acts And Offences Of The Accused Number 1 And 2. Hence It Is Prayed That Directions Be Issued To Competent Authority To Register Fir Against Accused Number 1 And 2 U/S 193, 196, 199, 209, 211, 195-A, 406, 420, 499, 500 Ipc And Relevant Sections As Per Laws In Force At Present. Fir Be Registered Against Accused Number 1 And 2 In Interest Of Law And Justice.

Date : 06-01-2024
Hoshiarpur


Submitted By
Balwinder Singh
(Complainant)

Verification : Verified That The Contents Of The Above Mentioned From Point Number 01 To 20 Are True And Correct To The Best Of My Knowledge And Belief & Nothing Has Been Kept Concealed Therein.

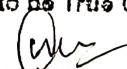
Date : 06-01-2024
Hoshiarpur

Submitted By
Balwinder Singh
(Complainant)

Through Counsel
Satbir Singh
Advocate
Mobile: 95011-88541

10349
Date of Application 25/11/24
Name of Applicant Maninder Sachdev
Date of Preparation 05/12/24
Copying Fee 06
Urgent Fee
No. of Pages 03
No. of Copies 1
Compared by
Date of Delivery
Examine

Certified to be True Copy


Examiner
Authorised by Section 76 of
The Indian Evidence Act 1872

05 DEC 2024