THAKUR RAMMNARYAN COLLEGE OF LAW

LEX COMMUNIQUE2026

PROPOSITION

TRIAL ADVOCACY

The Proposition has been drafted under the guidance of

Adv. Vivek Sharma

Advocate, Chambers of Sr. Adv. Cyrus Ardeshir

TABLE OF CONTENTS

SR. NO.	PARTICULARS	PAGE NO.
1.	UNDISPUTED FACTS	4
2.	FINAL FORM/REPORT	6
3.	ANNEXURE 1: FIRST INFORMATION REPORT	11
4.	ANNEXURE 2: ARREST MEMO	14
5.	ANNEXURE 3: AADHAA CARD - A1	17
6.	ANNEXURE 4: SEARCH PANCHNAMA	18
7.	ANNEXURE 5: PROPERTY SEIZURE FORM	20
8.	ACCUSED NO.1 STATEMENT – RAJESH	22
9.	ANNEXURE 6: GENERAL DIARY-RAJESH	24
10.	ANNEXURE 7: FORENSIC EXAMINATION	26
11.	ANNEXURE 8: REMAND APPLICATION FOR JUDICIAL CUSTODY (RAJESH)	28
12.	ANNEXURE 9: WARRANT TO SEARCH	30
12.	ANNEXURE 10: ARREST MEMO - ACCUSED NO. 2 KAJU	31
13.	ANNEXURE 11: AADHAA CARD - A2	34
14.	ANNEXURE 12: SEARCH PANCHNAMA	35
15.	ANNEXURE 13: PROPERTY SEIZURE FROM	37
16.	ANNEXURE 14: SPOT MAP OF MEDICAL SHOP OF ACCUSED NO. - 2	40
17.	ACCUSED NO.2 STATEMENT – KAJU	41
18.	ANNEXURE 15: BANK STATEMENT OF MAX VIEW PHARMA	42
19.	ANNEXURE 16: CRD REQUESTING LETTER	45
20.	ANNEXURE 17: CALL DETAIL RECORD	47
21.	ANNEXURE 18: GENERAL DIARY – ARREST OF KAJU	49
22.	ANNEXURE 19: FORENSIC EXAMINATION	51
23.	ANNEXURE 20: COURT ORDER FOR INVENTORY	53
24.	ANNEXURE 21: INVENTORY PANCHNAMA	54
25.	ANNEXURE 22: CERTIFICATE FOR INVENTORY	60

LLX Communique a new beginning...

26.	ANNEXURE 23: REMAND APPLICATION FOR JUDICIAL CUSTODY (KAJU KHATRI)	61
27.	PROSECUTION WITNESS 1 – INFORMANT	63
28.	PROSECUTION WITNESS 2 – PANCHA	65
29.	PROSECUTION WITNESS 3 - PANCHA	66
30.	PROSECUTION WITNESS 4 – FORENSIC EXPERT	68
31.	DEFENCE WITNESS 1 – MALKHANA OFFICER	69
32.	DEFENCE WITNESS 2 – NEIGHBOUR	71

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UNDISPUTED FACTS

In the Republic of Zindia, the State of Zorashtra has recently witnessed a sudden surge in the illicit sale and distribution of a cough syrup branded “Ryzon” The city of Zumbai, particularly the Zandra area, reported multiple incidents of minors and young adults misusing the syrup for intoxicating purposes.

On the evening of 17th September, 2025, Police Constable Dev Patil, posted with the RTO Division of Zandra, reported an unusual pattern of movement near the bustling P-74, adjacent to Pillar No. 74 of the Zandra Station premises. He had observed an individual circling the area repeatedly, exchanging hurried glances and displaying behaviour that suggested they were either expecting someone or attempting to evade notice.

Acting on this intelligence, the Anti-Narcotics Team of Zandra swiftly mobilised and reached the location during peak transit hours. As the officers discreetly took positions, they spotted a man later identified as Rajesh standing near Pillar 74 with two white-coloured plastic bags.

The Anti-Narcotic team, as soon as they received this intel, reached the spot along with 2 Panchas. On interception, the officers discovered that these bags contained 1000 bottles of “Ryzon” cough syrup, each allegedly infused with Codeine Phosphate, a controlled narcotic substance prohibited except under lawful authorisation.

The officers conducted a search, during which they recovered bottles of Ryzon cough syrup from his possession. Upon further inquiry, the police inspected his mobile phone and discovered WhatsApp conversations that revealed active communication regarding the sale of the syrup. During the investigation, it was disclosed that Rajesh had been illicitly employed at a local pharmacy, through which the cough syrup was being distributed within the vicinity.

The investigation was subsequently widened. With the help of Call Detail Records (CDRs), the batch numbers printed on the seized bottles, and location data from Rajesh’s communications, the police traced the origin of the supply to a manufacturing outlet in Zaranasi, located in an industrial pocket on the outskirts of the city. Acting on the intelligence, a joint team of the NCB and local police conducted a raid at the premises, a two-storey warehouse disguised as a small-scale pharmaceutical packaging unit. The moment the officers entered, the gravity of the operation became evident.

Inside the warehouse, they discovered a substance that was illegally mixed into Ryzon cough syrup to enhance its intoxicating effect. Stacks of over 13460 filled bottles were found neatly

arranged in cartons, ready for dispatch to various parts of Zorashtra. Another section of the unit housed empty bottles, counterfeit labels, forged batch number stickers, and packaging material identical to that used by legitimate pharmaceutical manufacturers.

Amidst this large-scale illegal setup, the police found a young man known as “Kaju Bhai,” who appeared to be overseeing the packaging section. On checking his mobile phone and the documents on-site, it was revealed that multiple bank transactions linked to the illegal circulation had been routed through his personal account, and the medical shop used as the front for distribution was officially registered in his name. The conclusive documentary evidence, along with the seizure of huge quantities of adulterated cough syrup and scheduled narcotic substances, resulted in Kaju Bhai’s immediate arrest. He was taken into custody for his alleged role in operating a coordinated supply chain extending from Zaranasi to Zumbai.

Given the quantity of the contraband and the apparent coordinated presence of both individuals, the Anti-Narcotics Team registered the case under Section 8 (c) read with Section 22 (c), and Section 29 of the Narcotic Drugs and Psychotropic Substances (NDPS) Act, 1985, outlining offences relating to possession of a commercial quantity of narcotic substances.

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FINAL FORM / REPORT

(Under Section 193 BNSS)

1. **Details:**
   a) **District:** Zumbai District
   b) **P.S. :** Zandra Police Station
   c) **Year:** 2025
   d) **FIR No:** 017/2025
2. **Chargesheet No/Final Report No:** C.C. No. 017/2025
3. **Date of filing Report:** 17/09/2025
4. **Acts:** NDPS Act, 1985
5. **Section(s):** Sec. 8 (c) r/w Sec. 22 (c) & Sec. 29 of NDPS Act, 1985
6. **If supplementary or original**: Original
7. **Name of the I.O**.: P.I. Manoj Zende
   Rank: PI **No**.: 108/Zandra
8. **Name of the Complainant/Informant**: Dev Patil
9. **Information on properties/ articles/ documents seized/ seized during the Investigation:**

Sr. No.	Property Recovered/seized	Estimated value (original value)	P.S. Property No.	Property seized/ recovered from	Disposal
1	RYZON mixed with Codeine Phosphate -in total 286 cough syrup bottles	1,43,000/- (One Lac Forty-Three Thousand)	1/2025	Seized from accused no.1	Stored at Police Malkhana
2	RYZON mixed with Codeine Phosphate -in total 714 cough syrup bottles	3,57,000/- (Three lacs and Fifty - Seven Thousand)	2/2025	Seized from accused no. 1 as per the Seizure Report	Stored at Police Malkhana

Anti-Narcotics Cell, 23rd Street, Zandra, Zumbai. C.R. No. 017/2025

Details of the seized exhibits in case under Section 8 (c) r/w Section 22 (c) and Section 29 of NDPS, 1985:

Sr. No.	Exhibit No.	Seized item description	Disposal
1.	**(Batch H)**	250 Bottles of RYZON COUGH SYRUP 100 ml	Stored at Police Malkhana
	H-1	1 Bottle of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	H-2	1 Bottle of RYZON COUGH SYRUP 100ml (sample for forensic analysis)	Sent to FSL
2.	**(Batch I)**	250 Bottles of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	I-2	1 Bottle of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	I-1	1 Bottle of RYZON COUGH SYRUP 100ml (sample for forensic analysis)	Sent to FSL
3.	**(Batch J)**	250 Bottles of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	J-1	1 Bottle of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	J-2	1 Bottle of RYZON COUGH SYRUP 100ml (sample for forensic analysis)	Sent to FSL
4.	**(Batch K)**	250 Bottles of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	K-1	1 Bottle of RYZON COUGH SYRUP 100ml (exhibited sample)	Stored at Police Malkhana
	K-2	1 Bottle of RYZON COUGH SYRUP 100ml (sample for forensic analysis)	Sent to FSL

10. Particulars of the accused persons charge-sheeted:

a) **Name:** Rajesh Mishra

b) **Father's Name**: Manohar Mishra

c) **Age**: 18 **D.O.B.:** 08/09/2007

d) **Sex**: Male

e) **Blood Group**: AB+

f) **Nationality**: Zindian

g) **Religion**: N/A

h) **Address:** P-30, Zandra, Zorashtra, Zindia – 400109

i) **Provisional Crime No**.: 017/2025

j) **Regular Crime No**.: N/A

k) **Date of Apprehension**.: N/A

l) **Date of Release on Bail**: N/A

m) **Date on which forwarded to Court:** 18th September, 2025.

n) **Under Act(s) and Section (s):** Section 8 (c) r/w 22 (c) and 29 of NDPS

o) **Name of Bailer and their Addresses:** N/A

p) **Previous conviction with case ref**.: N/A

q) **Status of the Accused**: Judicial Custody

11. Particulars of the accused persons charge-sheeted:

a) **Name:** Kaju Khatri

b) **Father's Name**: Naryan Khatri

c) **Age**: 22 **D.O.B.:** 05/05/2003

d) **Sex**: Male

e) **Blood Group**: AB+

f) **Nationality**: Zindian

g) **Religion**: N/A

h) **Address:** Nayan Gasti, Jaitanpuram, Zaranasi, Zorashtra, Zindia.

i) **Provisional Crime No**.: 017/2025

j) **Regular Crime No**.: N/A

k) **Date of Apprehension**.: 1st October, 2025.

l) **Date of Release on Bail**: N/A

m) **Date on which forwarded to Court:** 1st October, 2025.

n) **Under Act(s) and Section (s):** Section 8 (c) r/w 22 (c) and 29 of NDPS

o) **Name of Bailer and their Addresses:** N/A

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p) **Previous conviction with case ref**.: N/A

q) **Status of the Accused**: Judicial Custody

12. Brief Course of the Investigation:

Police Constable Dev Patil of the RTO Division, Zandra, reported suspicious activity near the crowded P-74 area beside Pillar No. 74 at Zandra Station. He noticed a man repeatedly circling the spot, glancing around nervously as if waiting for someone or attempting to avoid detection. Acting upon this information, the Anti-Narcotics Team immediately proceeded to the location with two panch witnesses. During surveillance, the officers identified an individual, later named as Rajesh Mishra, standing near Pillar 74 carrying two white plastic bags. When intercepted, the team searched the bags. It recovered 1000 bottles of 'Ryzon' cough syrup, each containing Codeine Phosphate, a notified narcotic drug that cannot be possessed or distributed without lawful authority. Rajesh's mobile phone was examined on the spot, revealing WhatsApp chats which indicated active involvement in the illegal sale of the syrup. These chats further disclosed that one Rajesh had been employed at a nearby pharmacy and was using the medical shop as a means to circulate contraband in the locality. Based on these leads, the investigation was expanded. Contact Details, batch numbers printed on the seized bottles, and the location data extracted from Rajesh's communications helped trace the source of the supply to a manufacturing outlet in Zaranasi, situated in an industrial belt on the city's outskirts. A joint NCB–local police team raided the premises, which operated as a two-storey warehouse disguised as a small pharmaceutical packing unit. Inside, officers found substances being illegally blended into Ryzon syrup to increase its intoxicating effect, along with hundreds of filled bottles packed in cartons for statewide distribution. Another section contained empty bottles, fake labels, forged batch stickers, and packaging material identical to that of legitimate manufacturers. At the site, police apprehended a man known as **"**Kaju Bhai," who appeared to be supervising the packing operations. Examination of his mobile phone and documents recovered from the warehouse revealed that several bank transactions linked to the illicit supply chain were routed through his personal account, and that the medical shop used as the distribution front was registered in his name. The voluminous seizure of adulterated cough syrup, narcotic substances, and incriminating documents led to his immediate arrest for orchestrating the supply chain extending from Zaranasi to Zumbai. Considering the commercial quantity of contraband, the involvement of multiple individuals, and the organised manner of the operation, the Anti-Narcotics Team registered offences under Section 8 (c) read with

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Section 22 (c) and Section 29 of the NDPS Act, 1985, for unlawful possession, distribution of narcotic drugs.

13. List of Prosecution Witnesses: -

a. **Dev Patil (informant)**
b. **Dr Joshua Diaz**
c. **Neelu Bhatt**
d. **Rohit Tiwari**

Forwarded by the Station House Officer/ Officer-in-Charge: Gautam Waghmare
Rank: P.S.I.
Signature of the Officer-in-Charge:
Sd/-

Name of the I.O.: Manoj Zende
Rank: P.I
Signature of the I.O. submitting the Final Report/ Charge-sheet:
Sd/-

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ANNEXURE - 1

FIRST INFORMATION REPORT

(Under Section 173 BNSS)

1. **District:** Zumbai **P.S.:** Zandra **Year:** 2025 **F.I.R. No.:** 017/2025

   Date: 17/09/2025

2. **Act**: Narcotics Drugs & Psychotropic Substances Act, 1985 **Sections:** 8 (c) r/w 22 (c) and 29

3. (a) **Occurrence of Offence:**

   Day: Wednesday

4. **Date:** 17th September 2025.

   Time: 06:45 P.M.

   a) **Information received at P.S. Date:** 17th September 2025 **Time:** 06:45 P.M.
   b) **General Diary Reference: Entry No(s):** 018 **Time:** 08:50 P.M.

5. **Type of information**: Oral

6. **Place of occurrence:**

   (a) Direction and Distance from P.S.: North, 4 km. **Beat No:** 06

   (b) Address: Pillar No. 74 of the Zandra Station, Zandra, Zumbai, Zorashtra.

   In case, outside the limit of this Police Station, then: NA

7. **Complainant/informant:**
   (a) Name: Dev Patil
   (b) Father's / Husband's Name: Amit Patil
   (c) Date of Birth/Age: 47 years
   (d) Nationality: Zindia
   (e) Passport No: …….
   (f) Date of Issue: …….. Place of Issue ……..
   (g) Occupation: Police Constable, RTO Division
   (h) Address: Room No. 43, Near Pillar No. 1, Harizone Society, Zandra, Zumbai, Zorashtra – 400109.

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8. Details of known/suspected / unknown / accused with full particulars (Attach a separate sheet if necessary):

Rajesh Mishra

**Reasons for delay in reporting by the complainant / Informant:* N/A

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

1000 bottles of 'Ryzon' cough syrup containing Codeine Phosphate were seized from the possession of the accused at Pillar No. 74, Zandra Station area.

10. F.I.R. Contents (Attach separate sheets, if required):

I, Police Constable Dev Patil, aged 47 years, by occupation Police Constable, attached to the RTO Division, Zandra, state that on the date of the incident, I reported for duty in my usual course.

At about the evening hours, while I was present near Pillar No. 74 of the Zandra Station premises, I noticed a male person roaming suspiciously, carrying two white plastic bags in his hands. He was repeatedly moving around the same place and looking here and there as if waiting for someone, which raised suspicion in my mind.

Considering the suspicious conduct of the said person, I immediately passed on this information to the Anti-Narcotics Team, Zandra, through official communication.

After some time, the Anti-Narcotics Team arrived at the spot along with two independent panch witnesses. In their presence, the said suspicious person was intercepted. On inquiry, he disclosed his name as Rajesh Mishra.

Thereafter, in my presence and in the presence of the panch witnesses, the two white plastic bags carried by the said person were checked. Upon checking, it was found that the said bags contained 1000 bottles of "Ryzon" cough syrup. On preliminary verification, the said bottles were suspected to contain Codeine Phosphate, which is a prohibited narcotic substance. The said person failed to produce any valid licence or authority for possession of the same. And informed that these products were received from Zaranasi Outlet.

Accordingly, the Anti-Narcotics Team seized the said bottles under the due seizure Panchnama, and the accused Rajesh was taken into custody.

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Since the said act disclosed the commission of a cognizable offence under the Narcotic Drugs and Psychotropic Substances Act, 1985, I am giving this information for the purpose of registering an offence and taking necessary legal action.

12. **Action taken:** Since the above report of offence was registered under the NDPS Act, the accused was arrested, the property was seized, and the investigation was handed over to the Anti-Narcotics Team, Zandra.

F.I.R. read over to the complainant/informant, admitted to be correctly recorded, and a copy has been given to the complainant/informant, free of cost.

R.O.A.C.

Signature / Thumb- impression of the Complainant / informant:

Sd/-

Signature of the Officer-in-charge,

Police Station: Zandra

Sd/

Name: Manoj Zende

Rank: P.I

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ANNEXURE - 2

ARREST MEMO OF THE ACCUSED

1. **District:** Zumbai **P.S.:** Zandra **Year:** 2025
2. **FIR No:** 017/2025 **Date:** 17/09/2025
3. **Alphanumeric code of Accused: __A1__**
4. **Date & Time of Arrest/Surrender: Date:** 17/09/2025 **Time:** 7:00 P.M. **GD No.:** 018
5. **Acts & Sections:** Sections 8 (c) r/w, 22(c) and 29 of the Narcotics Drugs & Psychotropic Substances Act, 1985.
6. **Particulars of the Accused:**
   i) Name: Rajesh Mishra
   ii) Father's/Husband's Name: Manohar Mishra
   iii) Nationality: Zindia
   iv) Occupation: Worker at a Pharmaceutical Shop
   v) Permanent Address: P-30, Zandra, Zumbai, Zorashtra – 400109.
   vi) Present Address: P-30, Zandra, Zumbai, Zorashtra – 400109.
7. **Injuries, cause of injuries and physical condition of the accused person (Indicate if medically examined):** No visible injuries.

8. **The accused, after being informed the grounds of arrest and his legal rights, was duly taken into custody on** 17/09/2025 at 7:00 P.M. The following articles was/were found on a physical search conducted on the person of the accused, and were taken into possession for which a receipt was given to the accused: 1) Sky Blue Shirt, 2) White Jeans, 3) Light Brown Chelsea Shoe, 4) Smart Phone (Motorola G60 having phone no. 123XXXX890), 5) 1200 Rupees Cash, 6) 2 White Bags.

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**Necessary wearing apparel was left on the accused for the sake of human dignity and body protection. The accused was cautioned to keep himself covered for identification.*

Intimation was given to Father (**Relationship**) Manohar Mishra.

9. Physical features, deformities and other details of the accused:

Sex	Date/Year of Birth	Build	Height in Cms	Complexion	Identification Marks
1	2	3	4	5	6
Male	08/09/2007	Skinny	169	Light Brown	Scar Mark on Chin.

(For Modus Operandi Offences only)

Deformities/ Peculiarities	Teeth	Hair	Eye	Habits	Dress habit
7	8	9	10	11	12
-	Intact	Black	Black	Non- Smoker	Shirt & Jeans

Language/ Dialect	Place Of				
	Burn Mark	Leucoderma	Mole	Scar	Tattoo
Hindi	_	_	Left Hand on the top of Index Finger	Scar Mark on Chin.	_

10. Was a fingerprint taken or not? YES

11. Socio-economic profile of the accused showing: N.A.

Educational Qualification: 12th Pass

Occupation: Worker at a Pharmaceutical Shop.

12. Whether the accused person, as per the observations and known Police records:

a)	Is dangerous	No
b)	Previously escaped any bail	No
c)	Is generally armed	No
d)	Operates with accomplices	No
e)	Has past criminal records	No
f)	Is recidivist	No
g)	Is likely to escape bail	No
h)	If released on bail, is likely to commit another crime Immediately or threaten the victim /witnesses	No
i)	Is wanted in another case	No

Signature of the investigating officer with:

Sd/-

Name: Manoj Zende

Rank: I.O

PI Number. If any: P.I.000040.

Date: 17/09/ 2025.

Place: Zandra.

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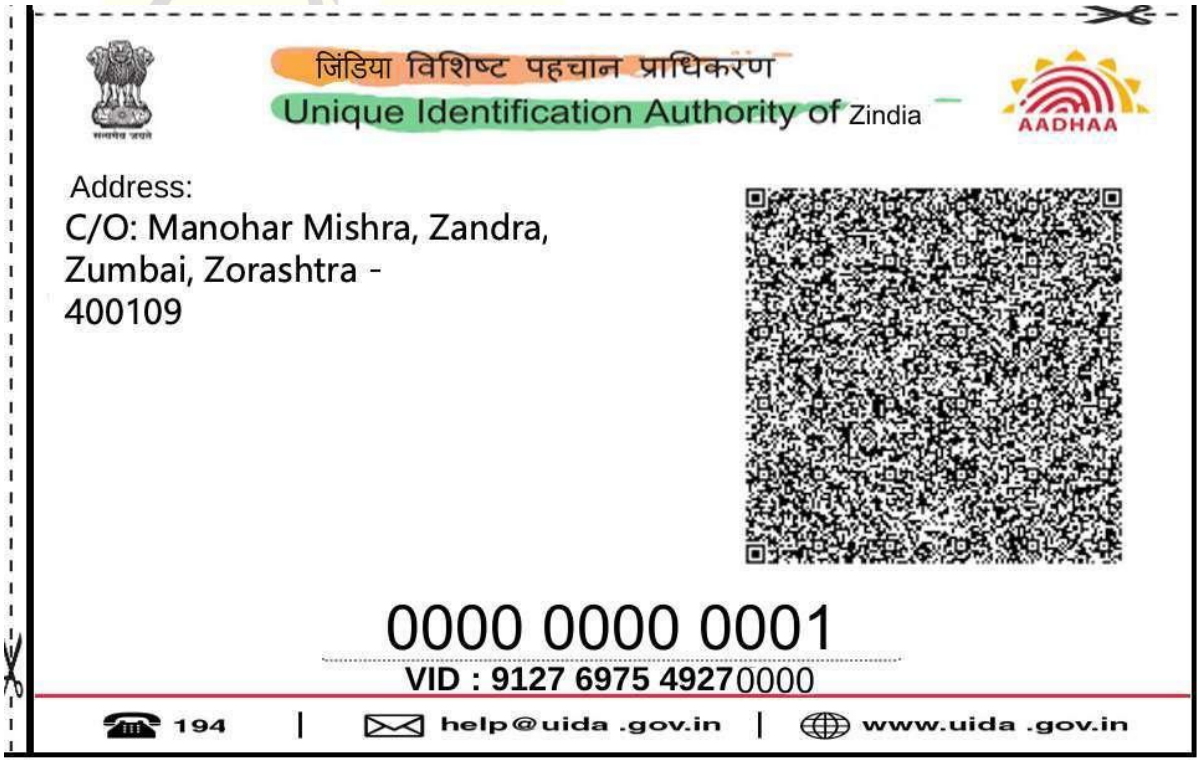
ANNEXURE - 3

AADHAA CARD - A1



ANNEXURE-4

SEARCH PANCHNAMA

(Prepared under Section 103 BNSS and Section 42 of the NDPS Act, 1985)

Police Station: Zandra Police Station, Zumbai

Agency: Narcotics Control Bureau (NCB) – Joint Team

Case Reference No.: 017/2025

Date of Search: 17/09/2025

Time of Commencement: 07:00 P.M. **Time of Conclusion:** 07:30 P.M.

1) Presence of Officers and Panch Witnesses:

On the above date and time, a joint team of the NCB and Zandra Police conducted a search based on reliable information about the illegal possession and movement of Ryzon cough syrup, which contains a scheduled narcotic substance, by a Young Boy.

Two independent panch witnesses from the locality were called to be present during the search. They agreed to assist voluntarily.

2) Names of Panch Witnesses:

1) Neelu Bhatt, Occupation – Tea Stall owner.

2) Sunil Yadav, Occupation – Dairy Farming.

3) Description of the Person/Premises Searched:

Police Constable Dev Patil, posted with the RTO Division of Zandra, reported an unusual pattern of movement near the bustling P-74. He had observed an 18-year-old boy named Rajesh with two white bags, who appeared nervous, and also, at that place, many illicit drug distribution cases were registered. On his suspicious behaviour, the officers informed the Anti-Narco Team and seized his bag in accordance with Section 42 of the NDPS Act, 1985, and Section 103 of the BNSS.

4) Conduct of Search:

The officers informed the boy and the Panch witnesses about the purpose of the search. The search was carried out properly and in the presence of both panch witnesses.

**Articles Found and Seized*

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5) During the search, the following items were recovered:

1. Two bags (1000 Bottles) of Ryzon cough syrup were found on Rajesh, suspected of containing narcotic substances.
2. Rajesh's mobile phone, which had WhatsApp chats with buyers and suppliers of Ryzon cough syrup. All recovered items were sealed, labelled, and signed by the Panch witnesses and the officers present.

6) Arrest:

Based on the evidence recovered from Rajesh and his communications, he was taken into custody as per the law. He was also booked for offences under Sections 8 (c) r/w 22 (c) and 29 of the NDPS Act, for unauthorised possession and distribution of narcotic substances. A separate arrest memo was prepared following all legal requirements.

7) Preparation and Acknowledgement:

This Panchnama was prepared at the spot in the presence of the Panch witnesses. It was read out to the Panch witnesses and the accused. They stated that the record correctly describes the events that took place.

Date: 17/09/2025

Signatures:

Panch Witness 1: SD/-

Panch Witness 2: SD/-

Accused No. 1: SD/-

Seizing Officer (NCB): SD/-

Ravindra Singh

Seizing Officer (Police): SD/-

Manoj Zende

Official Seal: Deemed to be affixed.

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ANNEXURE - 5

PROPERTY SEARCH AND SEIZURE FORM

(Under Section 185 BNSS read with 42 of NDPS)

1. **District:** Zandra **P.S.:** Zandra

2. **FIR No.:** 017/2025 **Date:** 17/09/2025

3. Acts & Sections: Sections 8 (c) r/w 22 (c) and 29 of the Narcotics Drugs & Psychotropic Substances Act, 1985.

4. Name of Property seized/ received: Ryzon bottles

5. Property seized/recovered/discovered at:

a. **Date:** 17/09/2025

b. **Time:** 07:30 P.M.

c. **Address of the place from where the seizure/recovery:** Pillar No. 74 of the Zandra Station, Zandra, Zumbai, Zorashtra.

d. **Description of the place of seizure/recovery:** Near Zandra railway Station, known for high drug distribution. Cases registered from that place.

6. Witness:

i) **Name:** Neelu Bhatt

Age: 40 Years

Residing at: Bhatt Tea Corner, Beside Zandra Railway Station, Zandra, Zumbai

ii) **Name:** Sunil Yadav

Age: 42 Years

Residing at: Beside Zandra Police Station, Zandra, Zumbai.

7. Action Taken/Recommended for disposal of perishable Property: NIL

8. Circumstances/grounds for seizure: Relevant for investigation

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9. Detail of property seized/ recovered:

SI. No.	Property Description	I.O. Marking
1.	1 White bag filled with 500 Ryzon Cough Syrup	**Seized**
2.	1 White bag filled with 500 Ryzon Cough Syrup	**Seized**

Witness-1: SD/-

Neelu Bhatt

Name of I.O.: SD/-

Manoj Zende

Witness-2: SD/-

Sunil Yadav

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ACCUSED NO. 1 STATEMENT - RAJESH MISHRA

(Under Section 67 of NDPS)

Place of Recording: Zandra Police Station, Zandra, Zumbai. Zorashtra
Date & Time: 17/09/2025
Name: Rajesh Mishra
Age: 18
Father's Name: Manohar Mishra
Address: P-30, Zandra, Zumbai.

I, Rajesh Mishra, aged 18 years, residing at P-30, Zandra, Zumbai, state as follows:

I have been falsely implicated in this case, and I did not know that the two bags I was carrying contained illegal substances. The bags were handed to me shortly before the incident by a transporter who told me they were ordinary medical items to be delivered to a nearby medical shop. Being only 18 years old and working occasionally as a helper for small errands, I neither opened the bags nor had any reason to doubt what I was told. I am not involved in the procurement, storage, stocking, or selling of any medicines, nor have I ever been engaged in any illegal activity.

When the police stopped me suddenly, I got frightened due to my age and lack of understanding of legal procedures. I was not aware of what was happening or why I was being questioned. The officers later showed me WhatsApp messages taken from my phone, but many of those chats are from groups or conversations I did not initiate. Some messages were from people who used my phone or sent forwarded content, and they have nothing to do with selling any cough syrup. None of those chats proves that I was aware of any illegal substance or that I was knowingly involved in any narcotics activity.

I also state that I have no financial connection, no bank transactions, and no link whatsoever with the alleged warehouse in Zaranasi. I have never travelled there, never contacted anyone from there, and have no role in any such operation. I come from a simple background, live with my family, and earn a small amount by doing occasional delivery tasks.

I had only been handed two sealed bags for delivery and was unaware of their contents. I had no intention to commit any offence, and there is no evidence that I had any conscious possession

or knowledge of narcotic substances. I believe I have been wrongly accused due to misunderstanding, assumptions made by the police, and because of my young age and inability to defend myself properly at the spot.

I state that I am innocent and have been needlessly dragged into this case despite having no role in the alleged offence.

Signature/Thumb Impression of Accused: SD/-

Name: Rajesh Mishra

Date & Time: 17/09/2025, 08:07 P.M.

Signature & Seal of Recording Officer: Deemed to be affixed

Name & Rank: Manoj Zende, **I.O.**

Place: Zandra

Date: 17/09/2025

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ANNEXURE - 6

GENERAL DIARY DETAILS

State: Zorashtra

P.S.: Zandra

District: Zumbai

1. **G.D. No.:** 018
2. **G.D. Date:** 17/09/2025 Time: 08:50 P.M.
3. **G.D. Type**: Arrival/Return
4. **Entry for (officer**): Suresh Bhoye
5. **Case Type:** NDPS
6. **Subject:** Arrival of Police Force Anti-Narcotics Cell, Co-Accused in Zumbai, Zorashtra.
7. **G.D. Brief:**

Arrival of Police Force Anti-Narcotics Cell, Accused in Zumbai, Zorashtra…

At present, Gautam Waghmare, PSI, posted to Anti-Narcotics Cell, Zumbai, Zorashtra, to PC No. 000007 Sodhane, P.C.No. 000008 Hariram. P.C.No. 000009 Myneni, Nagesh Chikne API has been sent off to P-74, Zandra, Zumbai. Crime No. 017/25, Section 8 (c) r/w 22 (c), 29 NDPS Act-1985 for investigation by Police Sub-Inspector, Assistant Police Inspector Nagesh Chikne, P.C.000010, all appointed - The Anti-Narcotics Cell, Zumbai, along with 2 Panchas had come for investigation to P-74, Zandra, Zumbai. On the Spot, there was a boy who identified himself as Rajesh Mishra, Age 18. On interception, the officers discovered that two white-coloured bags contained 1000 bottles of "Ryzon" cough syrup, each allegedly infused with Codeine Phosphate, a controlled narcotic substance prohibited. He was brought to the police station. Upon further inquiry, the police inspected his mobile phone and discovered WhatsApp conversations that revealed active communication regarding the sale of the syrup with Chagan Bhai. The chats disclosed that Rajesh had been illicitly employed at a local pharmacy, through which the cough syrup was being distributed. Rajesh guided the police to trace the origin of the supply to a manufacturing outlet in Zaranasi. After the police interrogation today on 17th September 2025, Rajesh Mishra, age 18, was arrested today on 17th September 2025, by Zandra Police. NCB, with the help of police personnel of Police Station Jaitanpuram, Zaranasi, along with Rajesh Mishra, scheduled a raid for the Zaranasi Outlet. During the Arrest, all orders of the Hon'ble Supreme Court were followed by the police,

and the arrest was communicated to his family. The medical examination will be done under the supervision of M.I. Suresh Maya.

8. **Acts & Sections:** Section 8 (c) r/w 22 (c), and 29 of the Narcotic Drugs and Psychotropic Substances Act, 1985 (NDPS Act).

Report Printed On: 17/09/2025

Report Printed By: Suresh Bhoye

Name: Suresh Bhoye

Rank: API

Signature: SD/-

Name: Suresh Bhoye

Rank: API

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ANNEXURE - 7

FORENSIC EXAMINATION REPORT

M.L. Case No.: N-001
M. (T). No.: 01
Date: 24/09/2025
Total No. of Pages: Two

To,
The Senior Police Inspector,
Anti-Narcotics Cell, CB
Zandra Unit
Dist.: Zumbai

1) **Ref. No.:** 097 **Date:** 18/09/2025
2) **No. of exhibits received:** 2 **P.S.:** (ANC) Zandra Unit
3) **C. R. No.:** 017/25 **U/s.:** 8 (c) r/w 22(c), 29 of NDPS Act,1985
4) **Mode of receipt:** H.C. 971042 **Date of receipt:** 18/09/2025

5) **Condition of the parcel(s)/seal(s):**

--- Two sealed parcels, seals intact and as per copy sent---

6) **Description of articles contained in the parcel:**

Exhibit no's 1 and 2: - These sealed parcels filled with Light orange liquid in a separate 1000 plastic bottles with bluish cop and each having printed label" Ryzon Cough Syrup, Batch no. 010313-SD14, Max View Pvt. Ltd."etc. packed in 2 separate packets marked – “Exhibit – 1 and Exhibit – 2” respectively and Labelled-"Antinarcotic cell, Zandra Unit, CR NO. 017/25 u/s 8 (c) r/w 22(c), 29 NDPS Act. 1985" etc and each exhibit contained 500 bottles of Ryzon cough syrup, which was written in English.

RESULTS OF ANALYSIS:

--- Codeine is detected in exhibits no's 1 and 2 ---

Analysis started on: 20/09/2025

Analysed by: Sd/-

Name: (Dr. Joshua Diaz)

Assistant Chemical Analyser,

Analysis completed on: 24/09/2025

Designation: Directorate Forensic Science Laboratories, Zort, Zumbai

Note:

1) Results related only to the exhibits tested.

2) Report shall not be reproduced except in full, without the written approval of the Director.

3) After examination:

a) Biological exhibits will be disposed of.

b) Exhibit should be removed within fifteen days from the receipt of this report.

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ANNEXURE - 8

REMAND APPLICATION FOR JUDICIAL CUSTODY (RAJESH MISHRA)

(Under Section 187 of BNSS)

IN THE COURT OF SESSIONS AT ZANDRA, ZUMBAI

NDPS SPECIAL CASE NO. 017 OF 2025

State of Zorashtra …Applicant

Versus

Rajesh Mishra …Accused

APPLICATION FOR POLICE CUSTODY REMAND

The Applicant–State most respectfully submits as under:

1. That the accused Rajesh Mishra was arrested on 17.09.2025 from Pillar No. 74, Zandra Station, while in possession of 1000 bottles of Ryzon cough syrup containing Codeine Phosphate, a commercial quantity under the NDPS Act.
2. That during preliminary interrogation and digital examination of the accused's mobile phone, it has been revealed that the accused was acting on instructions of other persons, whose names, roles, and addresses are not yet fully ascertained.
3. That the investigation has disclosed the existence of at least one more unknown accused, tentatively referred to as "Chagan", who is suspected to be involved in:
    i. Coordination of transport,
    ii. Distribution logistics,
    iii. Receiving sale proceeds.
4. That the identity, address, and exact role of the said unknown accused cannot be traced without the custodial interrogation of the present accused.
5. That further investigation is required for:
    i. Verification of WhatsApp chats and call records,

ii. Tracing bank transactions,
iii. Identifying the delivery chain and end-buyers,
iv. Locating the absconding accused and recovering further contraband.

6. That if police custody remand is not granted, the accused may:
   i. Suppress vital information,
   ii. Destroy digital evidence,
   iii. Enable the absconding co-accused to evade arrest.
7. That the present application is made bona fide, in the interest of justice, and strictly within the framework of law.

PRAYER

In view of the above facts, it is most respectfully prayed that this Hon'ble Court may be pleased to:

Grant police custody remand of the accused Rajesh Mishra for 30 days, to enable effective investigation into the involvement of unknown co-accused and their addresses, and to pass such other orders as this Hon'ble Court may deem fit in the interest of justice.

Date: 26th September, 2025
Place: Zumbai SD/-

Submitted by:
Investigating Officer
Anti-Narcotics Cell, Zandra

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ANNEXURE - 9

FORM NO. 11

WARRANT TO SEARCH AFTER INFORMATION OF A PARTICULAR OFFENCE

(*Under Section 96 of the BNSS*)

To

(Manoj Zende, IO),

WHEREAS information has been laid before me of the suspected commission of the offence of possession, sale of commercial quantities of narcotic substances (Codeine Phosphate) which is prohibited under the NDPS Act, 1985, and it has been made to appear to me that the production of adulterated bottles of Ryzon cough syrup, packaging materials, counterfeit labels, forged batch number stickers, financial records, communication devices, and any other evidence related to the illegal manufacturing and distribution network is essential to the inquiry about to be made into the said suspected offence;

This is to authorise and require you to search for the said items in the small-scale pharmaceutical packing unit, located on the outskirts of Zaranasi, and any connected premises under the control of Kaju Khatri alias Kaju Bhai, and, if found, to produce the same forthwith before this Court, returning this warrant, with an endorsement certifying what you have done under it, immediately upon its execution.

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Dated, this 26th day of September 2025.

Seal of the Court: Deemed to be affixed

Sd/-

ANNEXURE - 10

ARREST MEMO OF KAJU KHATRI (CO-ACCUSED)

1. **District:** Zaranasi **P.S.:** Jaitanpuram **Year:** 2025
2. **FIR No:** 017/2025 **Date:** 29/09/2025
3. **Alphanumeric code of Accused __A2__**
4. **Date & Time of Arrest/Surrender: Date:** 29/09/2025 **Time:** 04:00 P.M. **GD No**.: 039
5. **Acts & Sections:** Sections 8 (c) r/w, 22 (c) and 29 of the Narcotics Drugs & Psychotropic Substances Act, 1985.
6. **Particulars of the Accused:**

   i) Name: Kaju Khatri

   ii) Father's/Husband's Name: Naryan Khatri

   iii) Nationality: Zindia

   iv) Occupation: Works at Medical Shop

   v) Permanent Address: Nayan Gasti, Jaitanpuram, Zaranasi, Zuttar Pradesh

   vi) Present Address: Nayan Gasti, Jaitanpuram, Zaranasi, Zuttar Pradesh
7. **Injuries, cause of injuries and physical condition of the accused person (Indicate if medically examined):** No visible injuries.
8. **The co-accused, after being informed the grounds of arrest and his legal rights, was duly taken into custody on** 29/09/2025 at 04:00 P.M. The following articles was/were found on physical search, conducted on the person of the accused, and were taken into possession for which a receipt was given to the accused: 1) Green T-Shirt, 2) Brown Trouser, 3) Sandals, 4) Smart Phone (Samsung M33 having phone no. 789XXXX123), 5) 2000 Rupees Cash, 6) 1 Pack of Cigarette

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**Necessary wearing apparel was left on the accused for the sake of human dignity and body protection. The co-accused was cautioned to keep himself covered for identification.*

Intimation was given to Father **(Relationship)** Naryan Khatri.

9. Physical features, deformities and other details of the co-accused:

Sex	Date/Year of Birth	Build	Height in Cms	Complexion	Identification Marks
1	2	3	4	5	6
Male	05/05/2003	Skinny	170	Light Brown	Scar mark on Forehead

(For Modus Operandi Offences only)

Deformities/ Peculiarities	Teeth	Hair	Eye	Habits	Dress habit
7	8	9	10	11	12
-	Intact	Black	Black	Non- Smoker	T-Shirt & Trousers

Language/ Dialect	Place Of				
	Burn Mark	Leucoderma	Mole	Scar	Tattoo
Hindi	no	no	On Face	Scar on Forehead	no

10. Was a fingerprint taken or not? YES

11. Socio-economic profile of the accused showing: N/A

A. Educational Qualification: Illiterate

B. Occupation: Worker in a Medical Shop.

12. Whether the accused person, as per the observations and known Police records:

a)	Is dangerous	No
b)	Previously escaped any bail	No
c)	Is generally armed	No
d)	Operates with accomplices	No
e)	Has past criminal records	No
f)	Is recidivist	No
g)	Is likely to escape bail	No
h)	If released on bail, is likely to commit another crime immediately or threaten the victim /witnesses	No
i)	Is wanted in another case	No

Sd/-

Signature of the investigating officer with:

Name: Manoj Zende

Rank: I.O.

PI Number. If any: P.I.000040.

Date: 29/09/ 2025

Place: Zaranasi.

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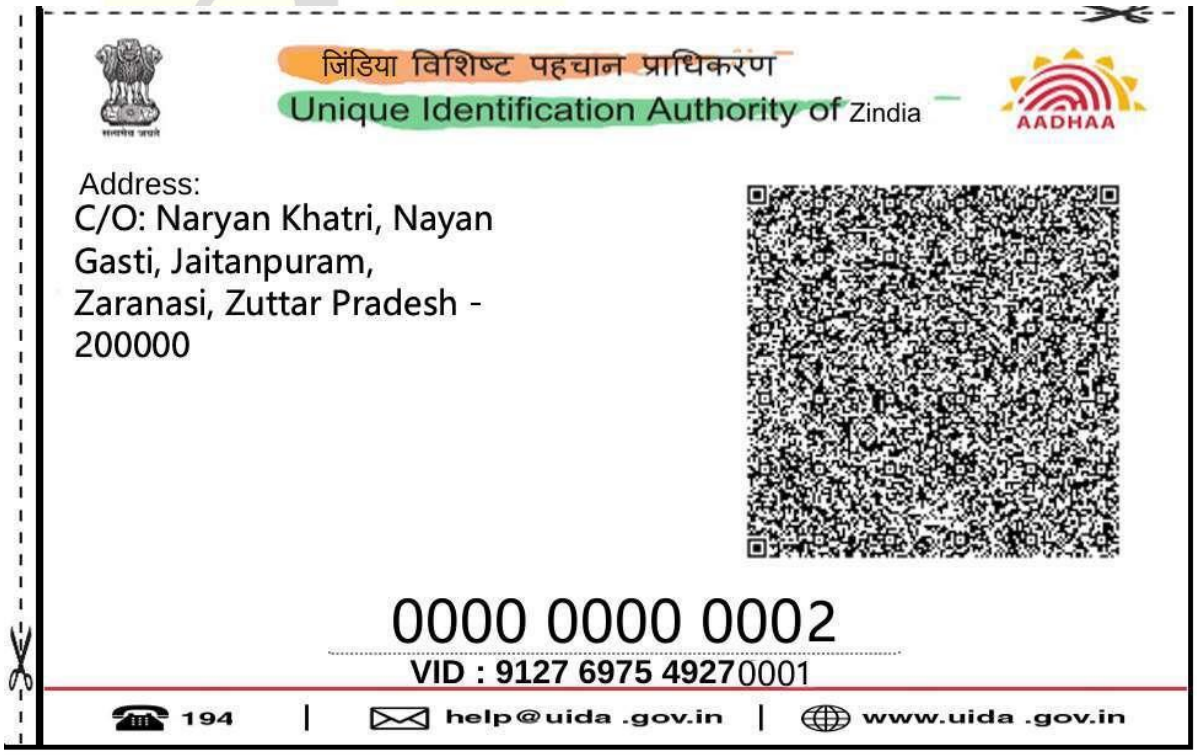
ANNEXURE - 11

AADHAA CARD - A2



ANNEXURE - 12

SEARCH PANCHNAMA

(Under Section 103 BNSS and Section 42 of the NDPS Act, 1985)

Police Station: Jaitanpuram Police Station, Zaranasi

Agency: Narcotics Control Bureau (NCB) – Joint Team with Zumbai Police Officials.

Case Reference No.: 017/2025

Date of Search: 29/09/2025

Time of Commencement: 04:00 P.M. **Time of Conclusion**: 05:00 P.M.

1) Presence of Officers and Panch Witnesses:

On the above date and time, a joint team of the NCB and Zandra Police, along with Jaitanpuram Police, conducted a lawful search of the above-mentioned premises pursuant to credible and specific intelligence regarding the illegal manufacture and packing of adulterated Ryzon cough syrup containing scheduled narcotic substances. Two independent panch witnesses from the locality were requested to remain present throughout the proceedings, and they agreed to assist voluntarily.

2) Names of Panch Witnesses:

1) Rohit Tiwari, **Occupation –** Pandit.

2) Vijay Kumar, **Occupation –** Peasant.

3) Description of the Person/Premises Searched:

The search team entered a two-storey warehouse appearing to operate as a pharmaceutical packing unit, containing mixing vessels, packing material, machinery and storage racks. One individual present on the premises identified himself as Kaju, who appeared to be supervising the shop.

4) Conduct of Search:

The officers informed the panch witnesses and the person present of the purpose of the search. The search was then carried out systematically in all rooms, sections and storage areas of the warehouse.

**Articles Found and Seized*

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5) During the search, the following items were recovered:

1) 13,460 bottles of Ryzon cough syrup bearing counterfeit labels and forged batch numbers, packed in cartons ready for dispatch.

2) Cartons of empty bottles, fake labels, forged batch stickers and packaging material resembling genuine pharmaceutical packaging.

3) Semi-automatic filling, sealing and labelling machines used for large-scale adulteration and repacking.

4) One mobile phone recovered from Kaju**,** containing bank transaction alerts linked to illegal distribution. All recovered items were sealed, labelled, and signed by the Panch witnesses and the officers present.

5) **Arrest:**

Based on the evidence recovered from Kaju Khatri, the illegal manufacturing and distribution operation became evident, and he was taken into custody as per the law. He was also booked for offences under Sections 8 (c) r/w 22 (c) and 29 of the NDPS Act, for unauthorised possession and distribution of narcotic substances. A separate arrest memo was prepared following all legal requirements.

6) **Preparation and Acknowledgement:**

This Panchnama was prepared at the spot in the presence of the Panch witnesses. It was read out to the Panch witnesses and the alleged accused. They stated that the record correctly describes the events that took place.

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Date: 29/09/2025

Signatures:

Panch Witness 1: SD/-

Panch Witness 2: SD/-

Accused No. 2: Impressed thumb/-

Seizing Officer (NCB): SD/-

Ravindra Singh

Seizing Officer (Police): SD/-

Manoj Zende

Official Seal: Deemed to be affixed.

ANNEXURE - 13

PROPERTY SEARCH AND SEIZURE FORM

(Under Section 82(2) and 185 BNSS)

1. **District:** Zaranasi **P.S.:** Jaitanpuram
2. **FIR No.:** 017/2025 **Date:** 29/09/2025

3. Acts & Sections: Sections 8 (c) r/w 22 (c) and 29 of the Narcotics Drugs & Psychotropic Substances Act, 1985.

4. Name of Property seized/ received: Ryzon bottles

5. Property seized/recovered/discovered at:

a. **Date:** 29/09/2025

b. **Time:** 05:00 P.M.

c. **Address of the place from where the seizure/recovery:** Nayan Gasti, Jaitanpuram, Zaranasi, Zuttar Pradesh

d. **Description of the place of seizure/recovery:** Max View Pharma, Nayan Gasti, Jaitanpuram, Zaranasi, Zuttar Pradesh, a two-storey warehouse, which includes a medical shop and a manufacturing hub and the recidency of the accused.

6. Witness:

i) **Name:** Rohit Tiwari

Age: 39 Years

Residing at: Near Jaitanpuram Police Station, Zaranasi, Zuttar Pradesh

ii) **Name:** Vijay Kumar

Age: 38 Years

Residing at: Near Ghashi Railway Station, Zaranasi, Zuttar Pradesh

7. Action Taken/Recommended for disposal of perishable Property: NIL

8. Circumstances/grounds for seizure: Relevant for investigation

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9. Detail of property seized/ recovered:

SI. No.	Property Description	I.O. Marking
1.	1 brown carton box filled with 671 Ryzon Cough Syrup	**Seized**
2.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
3.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
4.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
5.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
6.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
7.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
8.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
9.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
10.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
11.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
12.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
13.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
14.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
15.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
16.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
17.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**

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18.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
19.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
20.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
21.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**
22.	1 brown carton box filled with 609 Ryzon Cough Syrup	**Seized**

Witness-1: SD/-

Rohit Tiwari

Witness-2: SD/-

Vijay Kumar

Name of I.O.: SD/-

Manoj Zende

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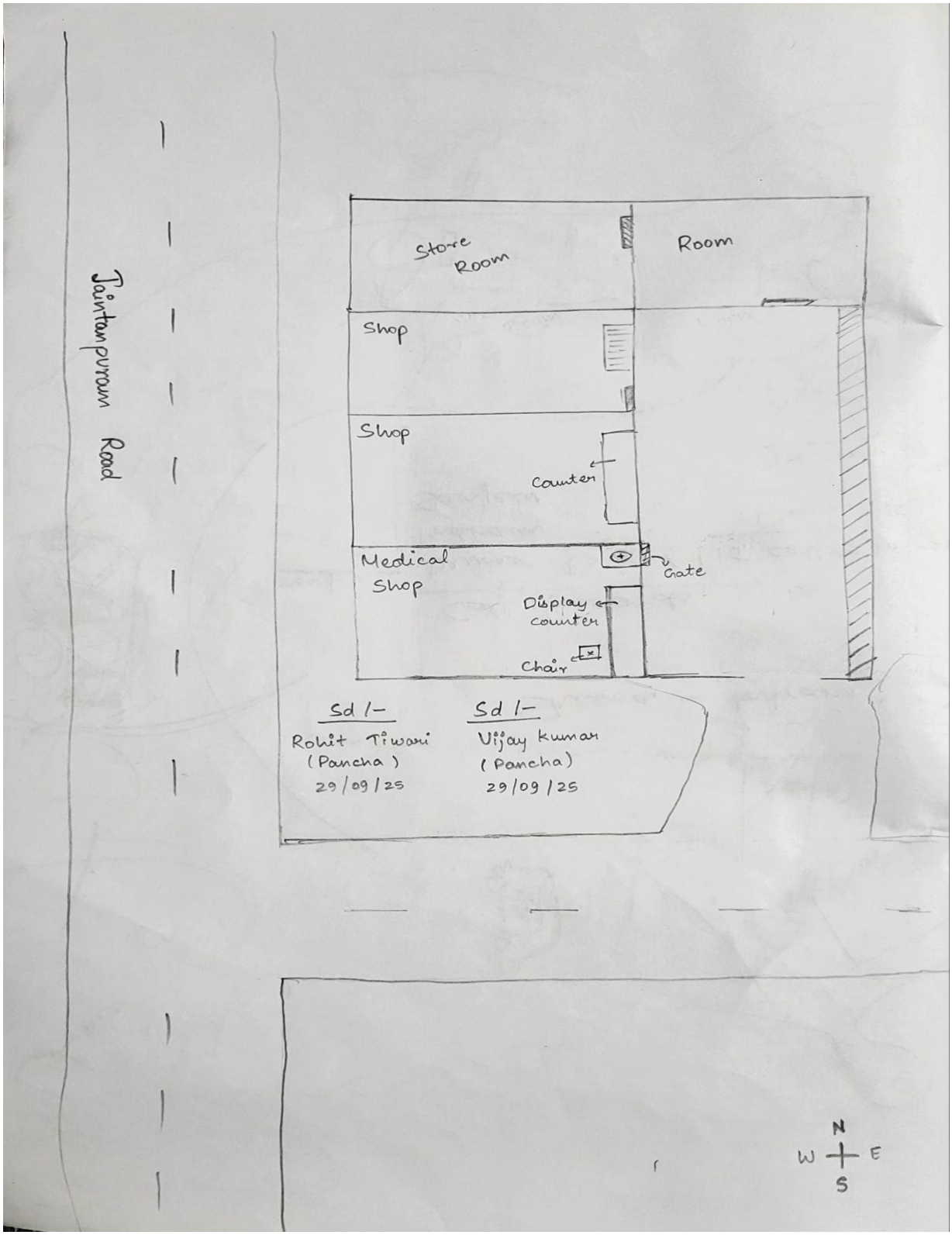
ANNEXURE - 14

SPOT MAP OF MEDICAL SHOP OF ACCUSED NO. - 2



ACCUSED NO. 2 STATEMENT - KAJU

(Under Section 67 of NDPS)

Place of Recording: Police Station Jaitanpuram, Zaranasi, Zuttar Pradesh

Date & Time: 29/09/2025

Name of Accused: Kaju Khatri, S/o Naryan Khatri

Age: 22 years

Address: J 11/67-A-S, Nayan Gasti, Jaitanpuram, Zaranasi, Zuttar Pradesh

My name is Kaju Khatri, son of Naryan Khatri, aged 22 years. I reside at J 11/67-A-S, Nayan Gasti, Jaitanpuram, Zaranasi. I am the accused in Crime No. 017/25 of Police Station Anti-Narcotics Cell, Zumbai, Zorashtra, registered under Sections 8 (c) read with 22 (c) and 29 of the NDPS Act, 1985. I wish to make a voluntary confession. I have not been tortured, threatened, coerced, or induced in any manner by the police or any other person to make this statement. I am making this confession out of my own free will and with a clear mind, understanding its consequences. I don't know about the illegal trade and distribution of "Ryzon" brand cough syrup, which contains Codeine Phosphate, a controlled narcotic substance. My Malik is the proprietor of "Max View Pharma," which he used as a front for this illegal activity. I don't know about anything, the sourcing, adulteration, packing, and sale of the illicit cough syrup. The manufacturing and packing were conducted at a unit located in Zaranasi, which was established as a small-scale pharmaceutical packaging unit. At this location, I work as a medical shopkeeper, for which I earn 6,000 rupees per month. I don't know about mixing controlled substances into the cough syrup to enhance its intoxicating effect. I don't know that they are counterfeiting labels, forged batch number stickers, and packaging materials, as I am illiterate; everything seems legitimate to me. My role involved managing the medical shop, which was located in Jaitanpuram, Zaranasi. The medical shop used for distribution was registered in my Malik's name. On 29th September 2025, I was apprehended by the police team from the Anti-Narcotics Cell, Zumbai, at the medical shop address in Jaitanpuram. I confess that I was not involved in the sale and distribution of a commercial quantity of Codeine Phosphate mixed in cough syrup authorisation. I have heard the above statement read over to me, and it has been explained to me.

Signature/Thumb Impression of Accused: Impressed thumb/-
Name: Kaju Khatri
Date & Time: 29/09/2025, 04:45 P.M.
Signature & Seal of Recording Officer: Deemed to be affixed
Name & Rank: Manoj Zende, I.O.
Place: Zaranasi
Date: 29/09/2025

ANNEXURE - 15

ZINDIAN NATIONAL BANK

(BANK STATEMENT OF MAX VIEW PHARMA)

Account Holder: Max View Pharma

Proprietor: Kaju Khatri

Bank: Zindian National Bank

Branch: Zumbai – Zakhar Junction

Account No.: XXXX1122

Statement Period: 01 April 2025 – 30 June 2025

TRANSACTION SUMMARY

Date	Particulars	Debit (₹)	Credit (₹)	Balance (₹)
01 Apr 2025	Opening Balance	–	–	8,500
02 Apr 2025	Grocery – Local Shop	250	–	8,250
04 Apr 2025	UPI Credit from A/C No. XXXX8569 to A/C No. XXXX1122	–	28,000	36,250
05 Apr 2025	Tea Stall	150	–	36,100
06 Apr 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	28,000	–	8,100
07 Apr 2025	Mobile Recharge	250	–	7,850
08 Apr 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	28,000	35,850
09 Apr 2025	UPI Credit from A/C No. XXXX4258 to A/C No. XXXX1122	–	87,500	123,350
10 Apr 2025	Grocery	300	–	123,050
11 Apr 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	27,500	–	95,550
12 Apr 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	92,750	188,300
14 Apr 2025	NEFT Credit from A/C No. XXXX3256 to A/C No. XXXX1122	–	73,500	261,800
15 Apr 2025	Street Snacks	200	–	261,600
16 Apr 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	33,500	–	228,100
18 Apr 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	30,350	258,450

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20 Apr 2025	UPI Credit from A/C No. XXXX6542 to A/C No. XXXX1122	–	40,000	298,450
21 Apr 2025	Mobile Recharge	250	–	298,200
22 Apr 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	30,000	–	268,200
23 Apr 2025	Grocery	350	–	267,850
24 Apr 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	30,000	297,850
26 Apr 2025	UPI Credit from A/C No. XXXX8426 to A/C No. XXXX1122	–	30,500	328,350
27 Apr 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	30,0000	–	298,350
29 Apr 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	30,050	328,400
30 Apr 2025	Tea Stall	150	–	328,250
02 May 2025	UPI Credit from A/C No. XXXX3322 to A/C No. XXXX1122	–	32,000	360,250
03 May 2025	Grocery	400	–	359,850
04 May 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	32,000	–	327,850
06 May 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	35,000	362,850
07 May 2025	NEFT Credit from A/C No. XXXX8762 to A/C No. XXXX1122	–	28,500	391,350
08 May 2025	Mobile Recharge	300	–	391,050
09 May 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	28,500	–	362,550
11 May 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	20,850	383,400
13 May 2025	NEFT Credit from A/C No. XXXX5573 to A/C No. XXXX1122	–	50,000	433,400
14 May 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	60,000	–	373,400
15 May 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	16,000	389,400
20 May 2025	UPI Credit from A/C No. XXXX8996 to A/C No. XXXX1122	–	27,500	416,900
21 May 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	25,000	–	391,900
22 May 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	18,750	410,650

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25 May 2025	UPI Credit from A/C No. XXXX1176 to A/C No. XXXX1122	–	30,000	440,650
26 May 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	35,000	–	375,650
27 May 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	23,000	398,650
02 Jun 2025	UPI Credit from A/C No. XXXX2985 to A/C No. XXXX1122	–	32,000	430,650
03 Jun 2025	Grocery	400	–	430,250
04 Jun 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	30,000	–	400,250
06 Jun 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	33,200	433,450
10 Jun 2025	UPI Credit from A/C No. XXXX3125 to A/C No. XXXX1122	–	28,500	461,950
11 Jun 2025	Mobile Recharge	300	–	461,650
12 Jun 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	28,500	–	433,450
13 Jun 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	22,850	456,300
18 Jun 2025	UPI Credit from A/C No. XXXX8855 to A/C No. XXXX1122	–	27,500	483,800
19 Jun 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	21,500	–	462,300
20 Jun 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	20,750	483,050
28 Jun 2025	UPI Credit from A/C No. XXXX1244 to A/C No. XXXX1122	–	30,000	513,050
29 Jun 2025	NEFT Transfer A/C No. XXXX1122 to A/C No. XXXX5584	23,000	–	490,050
30 Jun 2025	UPI Credit from A/C No. XXXX5584 to A/C No. XXXX1122	–	253,000	743,050

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ANNEXURE - 16

CDR REQUESTING LETTER

To

The Nodal Officer (Law Enforcement Requests)

Vodafone Idea Limited

Legal & Regulatory Compliance Cell

Date: 30/09/2025

Subject: Law Enforcement Request (LER) for Call Detail Records under NDPS Act

Sir/Madam,

The Anti-Narcotics Cell, Zandra, is investigating a connection with an offence punishable under the Narcotic Drugs and Psychotropic Substances Act, 1985. During the course of the investigation, it has emerged that the mobile numbers mentioned below are directly relevant for establishing communication links, conspiracy, and movement of the accused persons.

Accordingly, in exercise of powers conferred upon the undersigned under Section 94 of the Bhartiya Nagarik Suraksha Sanhita, 2023, read with the 67 of the NDPS Act, 1985, you are hereby requested to furnish the Call Detail Records (CDRs) for the period from **9th September 2025** to **15th September 2025** in respect of the following mobile numbers.

The information sought may include, as available in your records:

i. Incoming and outgoing call details

ii. SMS details

iii. IMEI numbers used

iv. Cell ID/location details

v. Subscriber details (CAF, KYC documents)

The particulars of the mobile numbers are as under:

Sr. No.	Name of Subscriber	Mobile Number
1.	Rajesh Mishra	123XXXX890
2.	Kaju Khatri	789XXXX123

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Sr. No. Name of Subscriber Mobile Number

3. Kaju Khatri 456XXXX321

The above information is required strictly for official investigation purposes relating to an NDPS case and shall be used in accordance with the law. You are requested to treat this communication as a Law Enforcement Request (LER) and provide the requested data through the prescribed secure channel at the earliest.

In case any additional authorisation, documentation, or clarification is required as per Vodafone Idea Limited's compliance protocol, the undersigned may be contacted without delay.

Thanking you,

Yours faithfully,

Officer-in-Charge
Anti-Narcotics Cell,
Zandra

Designation: NCB Officer
Name: Ravindra Singh
Official Seal: Deemed to be Affixed

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ANNEXURE - 17

CALL DETAIL RECORD – KAJU KHATRI

Number: 789XXXX123

IMEI: 372487236412345

Period: 09 Sept 2025 – 15 Sept 2025

Exhibit: CDR–2

Date	Time	Call Type	Calling No.	Called No.	Duration	Cell ID	LAC	IMEI
09-09-2025	09:18	MT	456XXXX321	789XXXX123	01:11	45301	1112	372487236412345
09-09-2025	10:23	MO	789XXXX123	981XXXX344	00:37	45301	1112	372487236412345
09-09-2025	18:05	MO	789XXXX123	456XXXX321	00:45	45112	1188	372487236412345
10-09-2025	09:56	MO	789XXXX123	877XXXX900	01:42	45112	1188	372487236412345
10-09-2025	12:08	MT	456XXXX321	789XXXX123	00:58	45301	1112	372487236412345
10-09-2025	18:33	MO	789XXXX123	456XXXX321	00:34	45301	1112	372487236412345
11-09-2025	11:48	MT	456XXXX321	789XXXX123	02:21	45301	1112	372487236412345
11-09-2025	13:09	MO	789XXXX123	700XXXX334	00:52	45301	1112	372487236412345
11-09-2025	20:54	MO	789XXXX123	456XXXX321	01:43	45301	1112	372487236412345

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12-09-2025	09:15	MT	456XXXX321	789XXXX123	02:07	45112	1188	372487236412345
12-09-2025	12:15	MT	456XXXX321	789XXXX123	02:07	45399	1148	372487236412345
12-09-2025	12:22	MO	789XXXX123	912XXXX341	02:44	45112	1188	372487236412345
12-09-2025	17:31	MO	789XXXX123	456XXXX321	01:32	45112	1188	372487236412345
15-09-2025	00:05	MO	789XXXX123	456XXXX321	00:40	45215	1922	372487236412345

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ANNEXURE - 18

GENERAL DIARY DETAILS

State: Zuttar Pradesh

P.S.: Jaitanpuram

District: Ghashi

1. **G.D. No.:** 039
2. **G.D. Date:** 29/09/2025 Time: 08:05 P.M.
3. **G.D. Type:** Arrival/Return
4. **Entry for (officer):** Nagesh Chikne
5. **Case Type:** NDPS
6. **Subject**: Return of Police Force Anti-Narcotics Cell, Accused in Zumbai, Zorashtra
7. **G.D. Brief:**

   Return of Police Force Anti-Narcotics Cell, Accused in Zumbai, Zorashtra…

   At present, Gautam Waghmare, PSI, posted Anti-Narcotics Cell, Zumbai, Zorashtra, to PC No. 000001. P.C.No. 000002 Kaale. P.C.No. 000003 Kharade, P.C.No. 000004 Salukhe, M.P.C.No. 000005 Dubre Maye, Suresh Bhoye, API, have been sent off to Natiamli, Zaranasi. Crime No. 017/25, Section 8 (c) r/w 22 (c), 29 NDPS Act-1985 for investigation by Police Sub-Inspector Gautam Waghmare, Assistant Police Inspector Suresh Bhoye, P.C.000001, Santane, P.C.000006, all appointed - The Anti-Narcotics Cell, Zumbai Police, Zaranasi, Zuttar Pradesh, had come for investigation along with the Accused of this matter, who was arrested on 17/09/2025 on Zandra, and 2 Panchas. The Accused guided the police force to the manufacturing hub of "Ryzon" and to the person he was in touch with, someone named Chagan Chatri. For that, around 8.30 am today, the person was found at his residence in front of the Gate of his Medical Shop, address - J 11/67-A-S, Nayan Gasti, Jaitanpuram, Zaranasi. He was brought to the police station, and during interrogation, Kaju Khatri, son of Mukesh Bhai, said that He don't know about anything he work under someone as a medical staff in return the owner "malik" give him 6000 rupees per month, and he is just a worker at Max View Pharma, and he looks after all the selling of "Ryzon bottles" to the customers in the shop only and he is not aware about any transactions, he lives in the Natiamli area of Jaitanpuram police station, the accused said. After the police interrogation on 29th September 2025, Kaju Bhai, aged 22, was arrested on 29th September 2025 by the Police Officer, Anti-Narcotics Cell, Zumbai, with the assistance of police personnel from Police Station Jaitanpuram, Zaranasi. During the Arrest, all orders of the Hon'ble Supreme Court were followed by the police, and the arrest was communicated to

his family, Father Naryan Khatri, aged 58 years. The medical examination will be done under the supervision of M.I. Nagesh Bikne and Maya Hamrah.

8. **Acts & Sections:** Section 8 (c) r/w 22 (c) and Section 29 Narcotic Drugs and Psychotropic Substances Act, 1985 (NDPS Act).

Report Printed On: 29/09/2025

Report Printed By: Nagesh Chikne **Signature:** SD/-

Name: Nagesh Chikne **Name:** Nagesh Chikne

Rank: API **Rank:** API

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ANNEXURE - 19

FORENSIC EXAMINATION REPORT

M.L. Case No.: N-002

M. (T). No.: 02

Date: 10/10/2025

Total No. of Pages: Two

To,

The Senior Police Inspector,

Anti-Narcotics Cell, CB

Zandra Unit

Dist.: Zumbai

1) **Ref. No.:** 112 **Date:** 03/10/2025
2) **No. of exhibits received:** 22 **P.S.:** (ANC) Zandra Unit, along with Jaitanpuram
3) **C. R. No.:** 017/25 **U/s.:** 8 (c) r/w 22 (c), 29 of NDPS Act,1985
4) **Mode of receipt:** H.C. 971042 **Date of receipt:** 03/10/2025

5) **Condition of the parcel(s)/seal(s):**

--- Twenty-two sealed parcels, seals intact and as per copy sent---

6) **Description of articles contained in the parcel:**

Exhibit no's A to V: - these sealed exhibits filled with Light orange liquid in a separate 13460 plastic bottles with bluish cop and each having printed label" Ryzon Cough Syrup, Batch no. 09847-SD19, Max View Pvt. Ltd. "etc. packed in 22 separate packets marked – “Exhibit – A, Exhibit – B, Exhibit – C, Exhibit – D, Exhibit – E, Exhibit – F, Exhibit – G, Exhibit – H, Exhibit – I, Exhibit – J, Exhibit – K, Exhibit – L Exhibit – M, Exhibit – N, Exhibit – O, Exhibit – P, Exhibit – Q, Exhibit – R, Exhibit – S, Exhibit – T, Exhibit – U, Exhibit – V” respectively and Labelled Exhibit A contain 671 Ryzon bottles and Exhibit B – V each exhibit contain 609 bottles of ryzon "Antinarcotic cell, Zandra Unit, CR NO. 017/25 u/s 8 (c) r/w 22 (c), 29 NDPS Act. 1985, etc., in English.

RESULTS OF ANALYSIS:

--- Codeine is detected in exhibits no's A to V ---

Analysis started on: 04/10/2025

Analysed by: Sd/-

Name: (Dr Joshua Diaz)

Assistant Chemical Analyser,

Analysis completed on: 10/10/2025

Designation: Directorate Forensic Science Laboratories, Zort, Zumbai

Note:

1) Results related only to the exhibits tested.

2) Report shall not be reproduced except in full, without the written approval of the Director.

3) After examination:

a) Biological exhibits will be disposed of.

b) Exhibit should be removed within fifteen days from the receipt of this report.

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ANNEXURE - 20

In the Court of Metropolitan Magistrate,

64th Court, Zandra, Zumbai.

C.C. No. 017/Misc/2025

(CR/LAC No. 017/2025 of ANC, Zandra Unit)

Order below Exh.1

1) This is an application made by the applicant Manoj Zende, Zumbai, for undertaking the exercise of certification of drawing of samples under the NDPS Act in respect of seized contraband, with details in the application.

2) As per the office order of Chief Metropolitan Magistrate, Zandra, Zumbai, dated 03/10/2025 bearing no. A123 with reference to Criminal Writ petition no. XXY/2Y1X Union of India vs the Registrar and office order no. XXYV, the undersigned (MM 54th Court), is notified under section 52-A (2) of the Act mentioned above to deal with applications of like nature. In the light of the provisions contained in section 52-A (2) of the Narcotics Drugs and Psychotropic Substances Act, 1985, applicant IO Manoj Zende, Zumbai has inter alia prayed for certification of correctness of inventory and issuance of such certificate; to permit taking in presence of the court of the seized items, inventory and to draw and certify the correctness of samples so drawn.

3) In view of the provisions contained in section 52A of the NDPS Act, 1985, the I.O. was directed to undertake the exercise prayed for on 03/10/2025 at about two hrs in my presence as provided by law.

4) Accordingly, the application is disposed of in terms of carrying out the inventory and issuance of a certificate.

Date: 03/10/2025 SD/-

Metropolitan Magistrate Court, Zandra, Zumba

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ANNEXURE - 21

INVENTORY PANCHNAMA

(Under Section 52A of the Narcotic Drugs and Psychotropic Substances Act, 1985)

Crime Register No.: C.R. No. 017/2025

Police Station: Anti-Narcotics Cell, Zandra Unit, Zumbai

Sections & Acts: Section 8 (c) r/w 22 (c) and 29 of the NDPS Act, 1985

Date: 03/10/2025

Time Started: 14:02

Time Concluded: 17:09

Panch Witnesses:

1. **Shri.** Leo Das Panch 1,

   Age: 36 years,

   Occupation: Pan Shop Owner

   Residing at: Srishti Nagar, Zandra, Zumbai, Zorashtra

2. **Shri.** Sudheer Dutta Panch 2,

   Age: 40 years,

   Occupation: Security Guard

   Residing at: NBY Society, Zandra, Zumbai, Zorashtra

We, the above-mentioned Panchas, state that we were called by the Police Inspector (P.I.) Manoj Zende of the Anti-Narcotics Cell, Zandra Unit, Zumbai, to the office of the Anti-Narcotics Cell. Upon our arrival, P.I. Zende introduced himself and his team members. He requested us to act as independent Panch witnesses for the proceedings of identifying and certifying the inventory of seized narcotic substances in C.R. No. 017/2025. We agreed to do so. He informed us that Police Constable Dev Patil of the RTO Division, Zandra, had reported suspicious activity near the crowded P-74 area beside Pillar No. 74 at Zandra Station. Acting on this intelligence, the Anti-Narcotics Team conducted surveillance and intercepted an individual named Rajesh Mishra. Upon searching him, they recovered 1000 bottles of 'RYZON' cough syrup containing Codeine Phosphate, a notified narcotic drug.

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P.I. Zende further explained that the investigation revealed a larger conspiracy. The probe led to a pharmacy employee named Rajesh and traced the source to a manufacturing outlet in Zaranasi. A subsequent raid at this warehouse led to the seizure of a commercial quantity of 13,460 bottles of adulterated Ryzon syrup and the arrest of the mastermind, Kaju Khatri alias Kaju Bhai.

He stated that the seized property (Muddemal), consisting of Cough Syrup Bottles, is currently in police custody. As per the mandate of Section 52A of the NDPS Act, this property must be produced before a Magistrate for:

1. Certification of the inventory.
2. Taking photographs.
3. Drawing of representative samples in the presence of the Magistrate.

We, the Panchas, along with P.I. Manoj Zende, Police Writer Vedant, Photographer Shri. R. Dayma and the Muddemal Clerk Sahil Talwar (who carried the seized property) proceeded from the Anti-Narcotics Cell office to the Hon'ble Magistrate's Court.

We appeared before Hon'ble Magistrate Shri. D. Mondal, presiding over Court No. 64, Zumbai.

The Investigating Officer produced the seized property, which consisted of a total of Twenty-Four (24) Brown Cartons taken from the safe custody of the Police Malkhana

The Hon'ble Magistrate personally examined the first bag labelled "Exhibit Batch H". The Hon'ble Magistrate verified that the bag was properly stitched and sealed with the official lac seal of the Anti-Narcotics Cell, and the seals were intact and untampered.

Upon the order of the Hon'ble Court, the seal was broken, and the mouth of the gunny bag was opened in our presence. Inside, a cardboard carton was found. Upon opening the carton, it was found to contain cough syrup bottles.

i. **Description:** The bottles bore the label "RYZON COUGH SYRUP 100 ml". The label indicated the composition included Codeine Phosphate.

ii. **Count:** In our presence, the court staff counted the bottles. There were exactly 14,460 bottles in this batch.

iii. **Weighing:** The bottles were placed on an electronic weighing scale.

   a. **Gross Weight:** 1,446,000,000 grams.
   b. **Net Weight:** 1,446,000,000 grams.

Drawing of Samples:

1. **Reserve Sample (H-1):** Under the direction of the Hon'ble Magistrate, **01 bottle** was randomly selected from the lot as a representative reserve sample. This bottle was placed inside a new light green paper envelope. The envelope was pasted with a slip signed by us (Panchas), P.I. Zende, and the Hon'ble Magistrate. It was tied with a white thread and sealed with lac seals of the Hon'ble Court. This packet was marked as Exhibit 'H-1' (Reserve Sample).
2. **C.A. Sample (H-2):** Then, another 01 bottle was randomly selected as a sample for Chemical Analysis. It was placed inside a new light green paper envelope. The envelope was pasted with a slip signed by the Magistrate and us. It was tied with a white thread and sealed with lac seals of the Hon'ble Court. This packet was marked as Exhibit 'H-2' (C.A. Sample).

Packing of Remaining Property:

The remaining 250 bottles of Batch H were placed back into their original cardboard box. The box was taped shut. This box was then placed into a gunny bag. The mouth of the bag was folded and stitched closed using a needle and twine. A paper label signed by us and the Magistrate was affixed. The bag was sealed with lac seals of the Hon'ble Court. This sealed bag was marked as Exhibit 'Batch H' (Remaining).

(The original empty gunny bag of Batch H was kept aside for separate packing).

The Hon'ble Magistrate then examined the second bag labelled "Exhibit Batch I". The Hon'ble Magistrate verified that the seals were intact and untampered.

Upon the order of the Hon'ble Court, the bag was opened. Inside, a cardboard carton was found containing cough syrup bottles.

1. **Description:** The bottles bore the label "RYZON COUGH SYRUP 100 ml" containing Codeine Phosphate.
2. **Count:** We counted the bottles. There were exactly 250 bottles in this batch.
3. **Weighing:**
   a. **Gross Weight:** 25000 grams.
   b. **Net Weight:** 25000 grams.

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Drawing of Samples:

1. **Reserve Sample (I-2): 01 bottle** was randomly selected as a representative reserve sample. It was placed inside a new light green paper envelope, signed by us and the Magistrate, tied with white thread, and sealed with lac seals of the Hon'ble Court. This packet was marked as **Exhibit 'I-2' (Representative Reserve Sample)**.
2. **C.A. Sample (I-1):** Then, another **01 bottle** was randomly selected as a sample for Chemical Analysis. It was placed inside a new light green paper envelope, signed, tied, and sealed with lac seals of the Hon'ble Court. This packet was marked as **Exhibit 'I-1' (C.A. Sample)**.

Packing of Remaining Property:

The remaining 250 bottles of Batch I were placed back into their original cardboard box. The box was taped shut and placed into a NEW white plastic gunny bag. The bag was stitched closed, labelled, and sealed with lac seals of the Hon'ble Court. This sealed bag was marked as Exhibit 'Batch I' (Remaining).

(The original empty gunny bag of Batch I was kept aside for separate packing).

Hon'ble Magistrate then examined the third bag labelled **"Exhibit Batch J"**. The seals were verified to be intact. Upon the order of the Hon'ble Court, the bag was opened. Inside, a cardboard carton was found containing cough syrup bottles.

1. **Description:** The bottles bore the label "RYZON COUGH SYRUP 100 ml" containing Codeine Phosphate.
2. **Count:** We counted the bottles. There were exactly 250 bottles in this batch.
3. **Weighing:**
    a. **Gross Weight:** 25000 grams.
    b. **Net Weight:** 25000 grams.

Drawing of Samples:

1. **Reserve Sample (J-1): 01 bottle** was randomly selected as a representative reserve sample. It was packed in a light green envelope, signed, tied, and sealed with the Court's seal. This packet was marked as Exhibit 'J-1' (Reserve Sample).

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2. **C.A. Sample (J-2): 01 bottle** was randomly selected for Chemical Analysis. It was packed in a light green envelope, signed, tied, and sealed with the Court's seal. This packet was marked as Exhibit 'J-2'.

Packing of Remaining Property:

The remaining 250 bottles of Batch J were placed back into their original cardboard box. The box was taped and placed into a NEW white plastic gunny bag. The bag was stitched, labelled, and sealed with the Court's seal. This sealed bag was marked as Exhibit 'Batch J' (Remaining).

(The original empty gunny bag of Batch J was kept aside.)

Hon'ble Magistrate then examined the fourth bag labelled **"Exhibit Batch K"**. The seals were verified to be intact.

Upon the order of the Hon'ble Court, the bag was opened. Inside, a cardboard carton was found containing cough syrup bottles.

1. **Description:** The bottles bore the label "RYZON COUGH SYRUP 100 ml" containing Codeine Phosphate.
2. **Count:** We counted the bottles. There were exactly 250 bottles in this batch.
3. **Weighing:**
    A. **Gross Weight:** 25000 grams.
    B. **Net Weight:** 25000 grams.

Drawing of Samples:

1. **Reserve Sample (K-1): 01 bottle** was randomly selected as a representative reserve sample. It was packed in a light green envelope, signed, tied, and sealed with the Court's seal. This packet was marked as Exhibit 'K-1' (Reserve Sample).
2. **C.A. Sample (K-2): 01 bottle** was randomly selected for Chemical Analysis. It was packed in a light green envelope, signed, tied, and sealed with the Court's seal. This packet was marked as Exhibit 'K-2' (C.A. Sample).

Packing of Remaining Property:

The remaining 250 bottles of Batch K were placed back into their original cardboard box. The box was taped and placed into a NEW white plastic gunny bag. The bag was stitched, labelled, and sealed with the Court's seal. This sealed bag was marked as Exhibit 'Batch K' (Remaining).

(The original empty gunny bag of Batch K was kept aside).

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Following the repacking of the bottles, the four (4) Original Empty White Plastic Bags (which originally contained Batches H, I, J, and K and bore the original police seals) were collected.

These four empty bags were folded and placed inside a single new white plastic gunny bag. The mouth of this new bag was folded inward and stitched closed using a needle and twine. A paper label signed by us, Pancha's, P.I. Zende, and the Hon'ble Magistrate was affixed to it.

The bag was then sealed with lac seals of the Hon'ble Court. This sealed bag was marked as Exhibit 'AA' (Original Packaging Material).

5. PHOTOGRAPHY AND CERTIFICATION

Throughout the entire process described above, including the breaking of original seals, the counting of bottles, the weighing, the drawing of samples, and the affixing of new Court seals, photographs were taken by the official photographer, Shri. R. Dayma

The Hon'ble Magistrate verified the correctness of the inventory, the list of samples drawn, and the photographs taken in their presence.

6. COURT ORDER ON CUSTODY

The Hon'ble Magistrate ordered that:

1. The **C.A. Samples** (Exhibits H-2, I-1, J-2, K-2) be handed over to P.I. Manoj Zende for immediate dispatch to the Forensic Science Laboratory (FSL) for analysis.
2. The **Representative Reserve Samples** (Exhibits H-1, I-2, J-1, K-1), the Remaining Property (Batches H, I, J, K Remaining), and the Packaging Material (Exhibit AA) be returned to the Anti-Narcotics Cell Malkhana for safe custody until further orders.

This Pachamama was dictated by the Hon'ble Magistrate and typed on a laptop by the Court Clerk in the open court. It was read over to us in the Local Language and explained to us. We confirm that it correctly records the events we witnessed.

Pachamama Started: 14:02

Pachamama Concluded: 17:09

Investigating Officer:

Manoj Zende

Police Inspector,

Anti-Narcotics Cell, Zandra Unit,

Zandra Police Station, Zumbai.

Signatures of Panchas:

1. Name: Leo Das

2. Name: Sudheer Dutta

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ANNEXURE - 22

Certification by the Magistrate under sub-section (3) of Section 52A of the Narcotic Drugs and Psychotropic Substances Act, 1985

Whereas the above officer applied to me under sub-section (2) section 52A of the Narcotic Drugs and Psychotropic Substances Act, 1985 to certify the above inventory, and sub-section (3) of that section requires any Magistrate to whom an application is made to allow the application as soon as may be, I, having been satisfied that the above inventory is as per the seizure documents and the consignments of seized goods related to the case presented before me, certify the correctness of the above inventory.

Date: 03/10/2025

Signature: SD/-

Name of the Magistrate: D. Mondal

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ANNEXURE - 23

REMAND APPLICATION – 2 (Kaju Khatri)

(Under Section 187 of BNSS)

IN THE COURT OF SESSIONS AT ZANDRA, ZUMBAI

NDPS SPECIAL CASE NO. 017 OF 2025

State of Zorashtra **…Applicant**

Versus

Kaju Khatri and Anr **…Accused**

APPLICATION FOR POLICE CUSTODY REMAND

The Applicant–State respectfully submits:

1. That the accused Kaju Khatri was arrested on 29.09.2025 from a warehouse at Zaranasi, where a large-scale illegal packing and distribution unit of Ryzon cough syrup was detected.
2. That though the accused was found supervising packing activities, investigation so far reveals that he is not the ultimate kingpin, but a link in a larger organised syndicate.
3. That preliminary investigation suggests:
    i. Presence of higher-level financiers,
    ii. Involvement of additional manufacturers and suppliers,
    iii. Routing of proceeds through multiple accounts and intermediaries.
4. That the accused has not yet disclosed:
    i. Complete financial trail,
    ii. Identity of persons supplying raw narcotic substances,
    iii. Names of distributors operating in other districts.

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5. That custodial interrogation is necessary to:
    i. Recover electronic devices and documents,
    ii. Confront the accused with bank records and forensic reports,
    iii. Identify the main accused and other conspirators under Section 29 NDPS Act.
6. That mere judicial custody will seriously hamper investigation, as the offence involves commercial quantity, organised crime, and inter-state ramifications.

PRAYER

It is therefore most respectfully prayed that this Hon'ble Court may be pleased to:

Grant police custody remand of accused Kaju Khatri for 30 days, as there is reasonable suspicion of involvement of an unknown accused in the larger conspiracy, and further custodial interrogation is essential to identify and apprehend the said person(s).

Date: 9th October 2025

Place: ZUMBAI

Sd/-

Submitted by:

Investigating Officer

Anti-Narcotics Cell, Zumbai

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STATEMENT OF DEV PATIL

(PROSECUTION WITNESS-1)

(Under section 180 of BNSS)

Name: Dev Patil

Father's Name: Amit Patil

Address: Zandra Police Station, Zumbai.

I, Dev Patil, aged 47 years, residing at Near Pillar No.1, Harizone Society, Zandra, Zumbai, Police Officer with the RTO Division, Zandra, state as follows:

On the evening of 17/09/2025, I was travelling through the P-74 area near Pillar No. 74, a route that is widely known in the locality for frequent drug-related activity and suspicious movement, when I noticed a man, later identified as Rajesh, repeatedly circling the same spot. He was constantly looking around, exchanging hurried glances with passersby, and behaving in a manner that suggested he was either waiting for someone or deliberately trying to avoid being noticed. His behaviour appeared highly unusual for that location and time, and because I was familiar with drug-related incidents on that stretch, I immediately sensed that something suspicious was taking place. I contacted the local police authorities and reported the matter, and the information was immediately relayed to the Anti-Narcotics Team of Zandra. Acting promptly on this intelligence, the Anti-Narcotics Team mobilised and reached the spot during peak transit hours. When they took discreet positions, they located the same individual I had described, standing near Pillar No. 74 and holding two white-coloured plastic bags.

The officers intercepted him in the presence of the Pancha witness. In my presence, they conducted a lawful search of the two plastic bags, which revealed 1000 bottles of "Ryzon" cough syrup, suspected to contain Codeine Phosphate, a controlled narcotic substance prohibited without valid authorisation. The bottles were counted and seized on the spot after proper sealing and documentation.

During further inquiry, the officers checked the accused's mobile phone, which contained WhatsApp conversations showing active communication about the sale of the Ryzon syrup. The chats further suggested that Rajesh had been illicitly employed at a nearby pharmacy, through which the distribution of the syrup was being carried out.

I confirm that I was the person who initially observed the suspicious behaviour and provided the information that led to the Anti-Narcotics Team's arrival. I witnessed the interception, the recovery of the bags, and the seizure of the contraband. The entire procedure was conducted lawfully, openly, and without any coercion or planting of material. I clearly identify Rajesh Mishra as the same person whose suspicious conduct I first observed on the P-74 road, which is known for narcotics activity. I make this statement voluntarily and truthfully.

Date: 17/09/2025 **Signature:**

SD/-

(Dev Patil)

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STATEMENT OF NEELU BHATT

(PROSECUTION WITNESS-2)

(Under Section 180 of BNSS)

Name: Neelu Bhatt

Father's Name: Suresh Bhatt

Occupation: Tea Stall Owner

Address: Bhatt Tea Corner, beside Zandra Railway Station, Zandra, Zumbai.

I, Neelu Bhatt, son of Suresh Bhatt, aged 40 years, occupation Tea Stall Owner, residing at Bhatt Tea Corner beside Zandra Railway Station, Zandra, Zumbai, state as follows:

On 17/09/2025, while I was at my tea stall near Zandra Railway Station, the Anti- Narcotics Police Officials approached me and informed me that a suspicious person had been intercepted near Pillar No. 74. Since I was present in the vicinity and had earlier noticed the same person moving unusually and suspiciously, I agreed to act as a Pancha witness and accompanied the police team to the spot.

Upon reaching the location, I saw the accused Rajesh Mishra standing with two white plastic bags. In my presence, the police questioned him about the contents of the bags, but he could not provide any satisfactory explanation. The police officers then conducted a search of both bags on the spot, in accordance with the law, and I personally witnessed the entire process. When the bags were opened, I saw that they contained 1000 bottles of "Ryzon" cough syrup, which the officers informed me was suspected to contain Codeine Phosphate, a narcotic substance. I witnessed the police count each bottle and then mark and seal the seized material properly. I confirm that nothing was added to or removed from the bags during the search and sealing process. I also witnessed the seizure of the accused's mobile phone, which was placed in a separate sealed and labelled envelope in my presence. The accused was informed of the seizure at the spot. I confirm that the entire search and seizure procedure was conducted openly, lawfully, and without any coercion or planting of material. After the proceedings were completed, the Memorandum Panchnama was prepared at around 8:30 PM, and it was read over to me in a language I understood. After understanding its contents, I signed it as a Pancha witness. I make this statement voluntarily and truthfully.

Date: 17/09/2025 **Signature:** Sd/-

(Neelu Bhatt)

STATEMENT OF ROHIT TIWARI (PANCHA)

(PROSECUTION WITNESS-3)

(Under Section 180 of BNSS)

Name: Rohit Tiwari

Age: 39

Father's Name: Kamal Tiwari

Occupation: Pandit

Address: Near Jaitanpuram Police Station, Zaranasi, Zuttar Pradesh.

I, Rohit Tiwari, son of Kamal Tiwari, aged 39 years, occupation Pandit, residing at near of Jaitanpuram Police Station, Zaranasi, ZuttarPradesh, on 29/09/2025, while I was going for mandir a police officer named Gautam called and asked me to act of Pancha for the search and seizure operation in the present matter, and then I agreed to act as a Pancha witness and accompanied the police team to the spot. The location was described as a two-storey warehouse in an industrial pocket on the outskirts of Zaranasi. In the Natiamli area, Jaitanpuram, Zaranasi, ZuttarPradesh, upon reaching the said premises, which appeared to be a residence of someone, and it also has a small medical Shop, the main door was opened, and we entered the premises. Inside that residence, a small-scale pharmaceutical packing unit was there. The police officials announced their identity and purpose. I witnessed the police officials conducting a thorough search in my presence.

During the search, the following items were discovered and seized: A large quantity of bottles of "Ryzon" brand cough syrup, already filled and sealed in 22 cartons, which contained a total number of 13,460 bottles ready for dispatch. A substantial stock of empty bottles, counterfeit labels, forged batch number stickers, and packaging material, including the machines for the filling and packing of the bottles. Various substances, powders, and liquids, which the officers stated were being illegally mixed into the cough syrup to enhance intoxicating effects. Documents and ledgers related to the operation. During the search, a young man was identified as Kaju Bhai. was found present at the location. He was apprehended by the police. The police officials checked his mobile phone and on-site documents in my presence. From these, it was revealed that the said premises and a medical shop named "Max-view Pharma" were linked to him, and financial transactions related to the sale of "Ryzon" bottles were routed through his accounts.

That the seized items were counted, listed, and packed in my presence. The police prepared a detailed seizure memo (Panchnama) on the spot, which I have signed after verifying that the contents recorded therein are true and correct to the best of my knowledge and observation. I was a witness to the entire search and seizure procedure from beginning to end. The allegedly accused Kaju Bhai was then formally arrested by the police officials after following due procedure. I confirm that I witnessed the arrest. I have read the contents of this statement, and they are true and correct.

Date: 29/09/2025 **Signature:** Sd/-

(Rohit Tiwari)

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PW 4- JOSHUA DIAZ

(Under Section 180 of BNSS)

Name of Witness: Dr Joshua Diaz

Father's Name: Peter Diaz

Age: 46 years

Occupation: Assistant Chemical Analyser, Directorate of Forensic Science Laboratory, Zort, Zumbai

Address: DB Ozone, Zort, Zumbai

I, Joshua Diaz, aged 46 years, residing at DB Ozone, Zort, Zumbai, currently serving as the Assistant Chemical Analyser, Directorate of Forensic Science Laboratory, Zort, Zumbai, make the following statement:

For the past 20 Years, I have worked in various capacities as the Chemical Analyser at the Forensic Science Laboratory. On 24/09/2025, Zandra Police Station submitted 2 sealed articles before me for Examination, which contained a total of 1000 bottles of Ryzon Cough Syrup. On 03/10/2025, I received another pack of 22 sealed articles by the Narcotics unit of Zandra Police. The articles contained a total of 13460 bottles of Ryzon Cough Syrup. Upon initial inspection, I confirmed that all the seals on the submitted items were intact and matched the sample of Codeine provided by the police for verification. This statement is being recorded to aid in the ongoing investigation concerning the NDPS Special Case. I affirm that I will provide my testimony and any necessary statements during the trial, as and when required by the court.

Date: 13/10/2025
Place: Zumbai

Signature of Deponent:
Sd/-
(Dr. Joshua Diaz)

STATEMENT OF SHIV DESHMUKH (MALKHANA OFFICER)

DEFENCE WITNESS-1

(Under Section 180 of BNSS)

Name of Witness: Shiv Deshmukh (Malkana Officer)

Age: 42 years

Occupation: Malkhana Officer

Father's Name: Om Deshmukh

Address: C-1, Azad Nagar, Zandra, Zumbai, Zorashtra.

I am presently working as the Malkhana In-charge at the Zandra Police Station and have been performing the said duties for the past several years. As part of my official responsibilities, I am required to receive, record, store, and produce seized articles in accordance with the prescribed procedure.

On the date relevant to the present case, the seized articles were deposited in the Malkhana during late evening hours. Due to heavy workload and shortage of staff, the formal entries in the Malkhana Register could only be completed on the following day. The seized property remained in the custody of the police station during this intervening period.

The storage facility of the Malkhana at Zandra Police Station is limited in capacity and does not have climate-controlled arrangements. The room is poorly ventilated and remains humid, particularly during the monsoon season. There have been occasions when water seepage from the ceiling has been noticed, and the condition of the storage area has been reported verbally to senior officers on more than one occasion.

I further state that the seized bottles and sample packets in this case were kept on a common storage rack along with other case properties, as no separate or sealed compartment was available. Due to space constraints, the seized articles were moved within the Malkhana more than once to accommodate additional property from other cases.

The samples intended for forwarding to the Forensic Science Laboratory were not dispatched immediately. There was a delay of a few days in sending the samples due to procedural formalities and lack of transport availability. During this period, the sealed packets remained stored in the same Malkhana facility.

I state that while the seals appeared intact at the time of dispatch, I am not in a position to certify the environmental conditions under which the seized articles were stored during the entire period, nor can I confirm that the seized property remained untouched at all times, as multiple officers have access to the Malkhana.

This statement is made to the best of my knowledge and based on official records maintained at the Malkhana.

Date: 18/09/2025

Place: Zumbai

Signature of Deponent:

Sd/-

(Shiv Deshmukh)

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STATEMENT OF GOPAL ROY (NEIGHBOUR)

DEFENCE WITNESS -2

(Under Section 180 of BNSS)

Name of Witness: Gopal Roy
Age: 41 years
Occupation: Web Developer
Address: P-30, Zandra, Zumbai, Zorashtra.

I, Gopal Roy, aged 41, residing at P-30, Zandra, Zumbai, do hereby voluntarily tender this statement in my capacity as a neighbour of Rajesh, son of Manohar Mishra, resident of P-30, Zandra, Zumbai, Zorashtra, who is presently under investigation in connection with the above-referred case. I have been a resident of the same locality as Rajesh and his family for the past 12 years. I have known him since he was a young boy and have watched him grow up in our neighbourhood. I wish to state, without any reservation or external influence, that Rajesh has always been known to me as a person of good character and decent conduct. In my interactions and observations over the years, I have found him to be respectful, obedient, and well-mannered. Always helpful to others, whoever needs him, he is always ready to help others in any situation. He comes from a simple family that upholds good values.
To the best of my knowledge, Rajesh has never been involved in any criminal, anti-social, or unlawful activities. He has no history of violence, aggression, or substance abuse in the neighbourhood. His general reputation among the residents is that of a quiet, non-troublesome young man. He is often seen assisting his family and has never been the subject of any complaint or negative report from neighbours. Based on my long-standing familiarity with him and his family, I sincerely believe that Rajesh is inherently a good boy. I make this statement truthfully and to the best of my knowledge, believing it may help with the investigation.

Date: 18/09/2025 **Signature of Deponent:**

Place: Zumbai Sd/-

(Gopal Roy)

NOTE:

All the additional evidence will be shared on the official Moot Court Association Instagram handle – *"mca_trcl"*. Kindly follow the page for further updates.

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