



### School of Law, CHRIST (Deemed to be University)

6<sup>th</sup> National Trial Advocacy & Judgment Writing



TRIAL PROPOSITION





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#### **DISCLAIMER**

This Trial Proposition is solely for the purpose of 6<sup>th</sup> SLCU National Trial Advocacy and Judgment Writing Competition 2020-2021. The contents of the same are purely imaginary and neither intends nor attempts to resemble any incident or any person living or dead. All materials, names, characters, locations, dates etc. in the trial proposition are fictitious and do not intend to or attempt to hurt the feelings or sentiments of any community or degrade the values and ideologies of any group of people, religion or individual. Any resemblance to the same is unintended and merely a coincidence.

#### **UNDISPUTED FACTS**

- 1. Vikram Nambiar and Chandramukhi Nambiar were a happily married couple who tied the knot 1 year ago. They had an arranged marriage, which was done in order to benefit their respective fathers in business. However, soon they started becoming affectionate towards each other and fell in love.
- 2. Both their fathers were industrialists. Vikram's father, Mr. Ramakrishna Nambiar was a widower. He owned a chemical factory named 'Nambiar and Sons' which dealt in manufacturing products and appliances of daily use. He was a big player in this market for more than 3 decades and was a very renowned and reputed name in the industry.
- 3. Chandramukhi's father Mr. Raghav Chettiar owned a chemical factory named 'Chettiar Chemicals'. His business dealt with supplying chemicals to different factories and private organizations. He was married for 40 years and has a single child, Chandramukhi.
- **4.** A foreign investor wanted to invest in a chemical factory in the country. After finding out about this prospective investor and the huge amount of money he was willing to invest in the business, Mr. Ramakrishna Nambiar launched his new chemical factory as a start-up to produce chemicals.
- 5. Mr.Chettiar approached him as he was a competitor in the market, and asked him to leave this field as his low prices were aiming at monopolizing the market. They both argued for a long time but Mr. Ramakrishna was persistent as he wanted the investment money from the foreign investor as it was a profitable deal. Mr. Chettiar raised his voice and swore to take the deal away from him at any cost.
- **6.** On the morning of 16th March, 2020 Mr. Ramakrishna came out of his bedroom and complained about the Air Conditioner (AC) not working properly and that he could hear some humming sound from the duct. Chandramukhi, his daughter-in-law, volunteered to get it fixed the same day. She





called the receptionist of 'Chettiar Chemicals' and asked him to send 2 technicians that could fix the Air Conditioner by afternoon.

- 7. The personal manager of Mr. Ramakrishna accompanied the technicians and showed them the way to the terrace since he was one of those people who was well versed with the nook and corner of the house.
- 8. On the same day the news came that the foreign investor was ready to invest in 'Nambiar and Sons' because of the respect Mr. Ramakrishna had in this field and his past records which showed that he had incurred huge profits, resulting in gaining the confidence of the investors. Chandramukhi had 20% shares in the company of her father in law. It was also decided that later, she would be having 30% stakes in the new venture.
- 9. Later, in the evening Vikram bragged about his father on closing the deal with the foreign investor to his wife, before going to sleep in their bedroom. This turned into a heated conversation between the two, which led to them making personal comments and hurling abuses at each other. Furious, the husband slammed the door and went to sleep with his father.
- 10. The next morning, Chandramukhi woke up and went to her father-in law's room but was shocked to see her father-in-law and husband's lifeless body on the floor, frozen on the bed and the servant Chote Lal's body motionless on the ground. There was a suicide note on the table next to the body of her father-in-law. The personal manager and the head of security staff of Mr. Ramakrishna were standing outside the room.
- 11. Investigating Officer, ACP Bhale Rao Singham arrested the manager, Mrs. Chandramukhi Nambiar and Mr. Raghav Chettiar on 17<sup>th</sup> March 2020 for conspiring and committing murder of Mr. Vikram and Mr. Ramakrishna Nambiar
- 12. The doctor after conducting the autopsy opined that the cause of death of the father-in-law could be due to a slit on the wrist with a sharp object. The autopsy report of the husband was delayed due to some insurmountable circumstances. On 21st March 2020, the I.O., ACP Bhale Rao Singham got posted to another city and his position was taken by ACP Vineet Singhal.
- **13.** ACP Vineet Singhal re-examined the evidences on record and found out after a new autopsy report, the reason for the death of the husband.
- **14.** He found a CCTV footage where at 6:17 AM he could see Santhanam Shivraj the manager of Mr. Ramakrishna going up the staircase and coming down within 10 minutes.





**15.** Due to the untimely and unexpected death of Mr. Ramakrishna Nambiar, the tender of the foreign investor was immediately passed to Mr.Chettiar and his industry, being the second best in town.







#### IN THE COURT OF THE PRINCIPAL SESSIONS JUDGE,

#### SRIVIJAYPURA CITY

S.C. No.519/2020

In the matter between:

C. C. No. 520/2020

V/S

State of Zootopia ...Prosecution

Mr. Raghav Chettiar and Other

...Defence

To,

1) Mr. Raghunathan Nair

2) Mr. Naveen Chacko

3) Mr. Chote Lal

4) Mr. Santa

5) Mr. Banta

6) Dr. Ramaraju

7) Dr. Sunil Shetty

8) Dr. Malli Venkatesh

9) Mr. Vivek Raina

10) Mr. Mahendra Shetty

11) Ms. Kiran Raina

#### **ORDER**

(Deemed to be proved and taken on record)

In pursuance of the information that has been laid before me that the three accused: (1) Raghav Chettiar (2) Chandramukhi Nambiar and (3) Santhanam Shivaraj in the present matter, herein referred to as A1, A2 and A3, have been arrested and taken into custody by the Srivijaypura City Police on the 17<sup>th</sup> March 2020 for conspiring and committing the offence of Murder and are punishable under Sections 302 r/w 120B, 201, 204 and 304-Aof the Indian Penal Code, 1860,





and it appears to me that you are likely to give material evidence or to produce any document or other thing for the prosecution;

I, Maitali Sharma, Principal Sessions Judge, Srivijaypura City, do hereby order that the reexamination of the concerned witnesses in the present matter be conducted on the 21<sup>st</sup>day of May 2020, at 10 A.M. before this Court and hereby summon the concerned witnesses to appear for the same and produce such document or thing or testify on the matter of the complaint before me. A warrant shall be issued to compel your attendance if you neglect or refuse to appear without just excuse.

**Seal**: Deemed to be affixed

**Date**: 21.05.2020

Signature of the Judge: Sd/Maitali Sharma





#### IN THE COURT OF THE PRINCIPAL SESSIONS JUDGE, SRIVIJAYPURA CITY

S.C. No.519/2020

In the matter between:

C. C. No. 520/2020

<b>State of Zooto</b>	pia	Prosecution

v/s

Mr. Raghav Chettiar and Others

...Defence

#### **ORDER**

(Deemed to be proved and taken on record)

InpursuancetotheCommittalOrderissuedbythelearned4<sup>th</sup>AdditionalMetropolitanMagistrate dated 19<sup>th</sup> March 2020, and wherefore information has been laid before me and on the consideration thereof, I have reasons to believe that the accused: (1) Raghav Chettiar (2) Chandramukhi Nambiar and (3) Santhanam Shivaraj who are Accused 1 (A1), Accused 2 (A2) and Accused 3 (A3) respectively are alleged for having conspired to and committed the offence of Murder of/on Mr. Ramakrishna Nambiar by slow induced intoxication of poisonous gas at his residence, Srivijaypura City on 16.03.2020between, 05:30 A.M. – 7.00 A.M.

I, Danish Singh, Principal Sessions Judge, Srivijaypura City do hereby charge the above mentioned

twoaccusedfortheoffencescommittedwhicharepunishableundersection(s)302r/w120B,307, 201, 204 and 304-Aof I.P.C. and do hereby direct that you all be tried by this Court for the above said offence from the date as specified.

The contents of the Charge have been read over and explained to all the three accused and the following questions were asked:





#### Accused No. 1: Mr. Raghav Chettiar

**Q.** Mr. Raghav Chettiar, have you heard and understood the contents of Charges formed against you?

Ans. Yes

**Q.** Do you plead guilty for the same or claim Trial?

**Ans.** I plead not guilty and wish to contest in the Trial proceedings.

#### Accused No. 2: Ms. Chandramukhi Nambiar

**Q.** Ms. Chandramukhi Nambiar, have you heard and understood the contents of Charges formed against you?

Ans. Yes

**Q.** Do you plead guilty for the same or claim Trial?

Ans. I plead not guilty and wish to contest in the Trial proceedings.

#### Accused No. 3: Mr. Santhanam Shivaraj

Q. Mr. Santhanam Shivaraj, have you heard and understood the contents of Charges formed against you?

Ans. Yes

**Q.** Do you plead guilty for the same or claim Trial?

**Ans.** I plead not guilty and wish to contest in the Trial proceedings.

The Summons is issued to all the concerned Witnesses and the Trial is scheduled to commence on 29th, 30th and 31st January, 2021 at 11:00 A.M. before this Court.

Seal: Deemed to be affixed Signature of the Judge:Sd/-

Date: 19.03.2020 Danish Singh





## IN THE COURT OF THE $4^{TH}$ ADDITIONAL METROPOLITAN MAGISTRATE, SRIVIJAYPURA CITY

In the matter between:

C. C. No. 520/2020

State of Zootopia ...Prosecution

v/s

**Mr. Raghav Chettiar and Others** 

...Defence

#### **COMMITAL ORDER**

(Deemed to be proved and taken on record)

Whereas information has been laid before me and on the consideration thereof, I have reasons to believe that all the accused: (1) Raghav Chettiar (2) Chandramukhi Nambiar and (3) Santhanam Shivaraj who are Accused1 (A1) Accused2 (A2) and Accused3(A3) respectively are alleged for having conspired to and committed the offence of Murder of one Mr. Ramakrishna Nambiar by slow induced intoxication of poisonous gas at his residence, Srivijaypura City on 16.03.2020 between, 05:30 A.M. – 7.00 A.M.

Since the offences are under Section(s) 302 r/w 120B, 307, 201, 204 and 304-Aof Indian Penal Code, 1860, it is exclusively tri able by the Court of Sessions at Srivijaypura City. Notice of the Committal Order has been given to the Public Prosecutor. Copies of the Final Report of the Investigating Officer have been given to both the accused.

Seal: Deemed to be affixed Signature of the Judge: Sd/-

Date: 05.10.2020 Lakshmi Kant Hegde



(3) Santhanam Shivaraj

## THE 6<sup>TH</sup> NATIONAL TRIAL ADVOCACY AND JUDGMENT WRITING COMPETITION



## IN THE COURT OF THE $4^{TH}$ ADDITIONAL METROPOLITAN MAGISTRATE, SRIVIJAYPURA CITY

S.C. No.519/2020

In the matter between:

C. C. No. 520/2020

#### SUMMONS TO ACCUSED PERSONS

(No. 1, Schedule V, Act, V, 1898) (Section 68 of the Code of Criminal Procedure)

State of Zootopia ....Prosecution

Mr. Raghav Chettiar and Others ....Defence

To,
(1) Raghav Chettiar
(2) Chandramukhi Nambiar and

Whereas your attendance is necessary to answer to a charge of under Sections 302 r/w 120B, 201, 204 and 304-A of Indian Penal Code, 1860, you are hereby required to appear in person by 29th, 30th and 31st January, 2021 before the Principal Session Judge, Srivijaypura City, on the 29th, 30th and 31st January, 2021 at ten O' clock in the forenoon. Herein fail not.

Given under my hand and the seal of the Court, this day of 05.10.2020.

**Seal**: Deemed to be affixed Signature of the Judge:**Sd/**-

Date: 05.10.2020 Lakshmi Kant Hegde





#### THE FINAL REPORT OF INVESTIGATING OFFICER:

(Under Section 173 Cr. P. C.)

Form No. 42.024

1. Details

a. District: Srivijayapura

**b. P.S.:** Chungam

**c. Year:** 2020

**d. FIR No.:** 351/2020

2. Final Report/ Charge Sheet No: 568/2020

**3. Date:** 15st August 2020

**4. Act:** Indian Penal Code

**Section(s):** 

5. Type of Final Form Report: Charge-Sheet

6. If supplementary or Original: Original

7. Name of the I.O: Vineeth Singhal

Rank: ACP No.: 787/Srivijayapura

8. Name of the Complainant/ Informant: Raghunathan Nair

#### 9. Date of properties/ Articles/ Documents recovered/seized during investigation:

S.	<b>Property Description</b>	Estimated	P.S Property	From whom/where seized
No		Value	Number	or recovered
1.	Knife with Deceased	Rs. 60	1A/351/2020	In the floor of the bedroom,
	1's blood	31	CU	near the bed towards
				Ramakrishna's right.
<u>2.</u>	Wallet of Deceased 1	Rs. 1000	1B/351/2020	In the bed desk next to the
				bed lamp.
<u>3.</u>	Wallet of Deceased 2	Rs.1000	1C/351/2020	Found in the pant pocket of
				the deceased that was on the
				door hanger.
<u>4.</u>	Mobile Phone of	Rs. 4000	1D/351/2020	In the bed desk next to the
	Deceased 1			bed lamp.
<u>5.</u>	Mobile Phone of	Rs. 5000	1D/351/2020	In the bed desk next to the





	Deceased 2			bed lamp. (left side)
<u>6.</u>	Diary	Rs. 100	1E/351/2020	Found in the cupboard.
<u>7.</u>	Suicide Note		1F/351/2020	Found in the bed.

#### 10. Particulars of the Accused Persons charge-sheeted:

10.1 Accused No. 1

i. Name: Chandramukhi Nambiar Whether verified: Yes

ii. Father's Name: Raghav Chettiar

iii. Age: 45 years DOB:01.02.1975

iv. Sex: Female

v. Blood group: B -ve

vi. Nationality: Indian

vii. Religion: Hindu

viii. Whether SC/ST: No

ix. Address: #15, Kamalam, Srivijayapura- 90 Whether verified: Yes

x. Provisional Crime No.: 568/2020

xi. Regular Crime No.: N/A 📐

xii. Date of Apprehended: 2nd June 2020

xiii. Date of Release on Bail: N/A

xiv. Date on which forwarded to Court: 4th October 2020

xv. Under Acts & Section: Section 302 r/w 120B, 307, 201 and 204, I.P.C.

xvi. Name of bailer/sureties and Address(es): N/A

xvii. Previous conviction with case reference: N/A

xviii. Status of the accused: Judicial Custody

xix. Medical Examination Report: Yes Attached

10.2 Accused No. 2

i. Name: Raghav Chettiar Whether verified: Yes

ii. Father's Name: Veeraraghavan Chettiar

iii. Age: 66 years **DOB**: 09.10.1945

# (6)

#### THE 6<sup>TH</sup> NATIONAL TRIAL ADVOCACY AND JUDGMENT WRITING COMPETITION



iv. Sex: Male

v. Blood group: B -ve

vi. Nationality: Indian

vii. Religion: Hindu

viii. Whether SC/ST: No

ix. Address: #15, Kamalam, Srivijayapura- 90 Whether verified: Yes

x. Provisional Crime No.: 568/2020

xi. Regular Crime No.: N/A

xii. Date of Apprehended: 2nd June 2020

xiii. Date of Release on Bail: N/A

xiv. Date on which forwarded to Court: 4th October 2020

xv. Under Acts & Section: Section 302 r/w 120B, 307, 201 and 204, I.P.C.

xvi. Name of bailer/sureties and Address(es): N/A

xvii. Previous conviction with case reference: N/A

xviii. Status of the accused: Judicial Custody

xix. Medical Examination Report: Yes Attached

10.3 Accused No. 3

i. Name: Santhanam Shivaraj Whether verified: Yes

ii. Father's Name: Madhava Shivaraj

iii. Age: 44 years **DOB**: 18.10.1975

iv. Sex: Male

v. Blood group: B +ve

vi. Nationality: Indian

vii. Religion: Hindu

viii. Whether SC/ST: No

ix. Address: #15, Kamalam, Srivijayapura- 90 Whether verified: Yes

x. Provisional Crime No.: 568/2020

xi. Regular Crime No.: N/A

xii. Date of Apprehended: 2nd June 2020

xiii. Date of Release on Bail: N/A

xiv. Date on which forwarded to Court: 4th October 2020

# (6)

#### THE 6<sup>TH</sup> NATIONAL TRIAL ADVOCACY AND JUDGMENT WRITING COMPETITION



xv. Under Acts & Section:

xvi. Name of bailer/sureties and Address(es): N/A

xvii. Previous conviction with case reference: N/A

xviii. Status of the accused: Judicial Custody

xix. Medical Examination Report: Yes Attached

#### 11. Brief Course of the Investigation:

On 17<sup>TH</sup> March 2020, the death of the two deceased were reported by the Head of the Security on 6:25 AM. Initially the body of the deceased were taken for the autopsy and post mortem report. ACP Bhalerao Singham was initially appointed as the IO. Subsequently he was transferred to Vetikutty Nagar and I was appointed to take over this case. There were some discrepancies that we found in the post mortem reports sent by the doctors. However, the veracity of the first report is completely questioned due to the dissonance of the evidence found and the entries given in the first report. We even got the CCTV footages that showed that the Santhanam Shivaraj was at the scene few moments after the estimated time of death. We have also found differences in the handwriting of the suicide note and the personal diary of Ramakrishna Nambiar.

#### 12. List of Prosecution Witnesses:

- 1. Raghunathan Nair
- 2. Naveen Chacko
- 3. Chote Lal
- 4. Dr. Sunil Shetty
- 5.Dr. Malli Venkatesh
- 6. Vivek Raina
- 7. Kiran Raina
- 8. Mahendra Shetty

Forwarded by the Station House Officer/ Officer-in-charge.

Sd/-

**Name: Vineeth Singhal** 

Rank: ACP, Srivijayapura

**Signature of the I.O. submitting the Final Report:** 

Sd/-





#### ANNEXURE NO. 1 FIRST INFORMATION REPORT

1. District: Srivijaypura P.S.: Chungam

**2. FIR No.:** 351/2020 **Date:** 17<sup>th</sup> March 2020

3. (i) Act: Indian Penal Code, 1860

(ii) **Section(s):**302 r/w 120B, 307, 201 and 204, I.P.C.

**4. Time of Occurrence of offence:** Between 4 AM to 7 AM

5. Information received at P.S.: 8:40 AM

**6. Type of information:** Oral

7. Place of Occurrence:

a) Direction and distance from P.S: 3 kms.

**b)** Address: 5<sup>th</sup> street, Chungam

c) In case, outside the limit of this Police Station, then Name of P.S.: N.A.

- 8. Details of known/suspected/unknown accused with full particulars: Chandramukhi Nambiar, daughter in law of Mr. Ramakrishna Nambiar; Mr. Santhanam Shivaraj, Personal Manager of Mr. Ramakrishna Nambiar; Mr. Raghav Chettiar, Chandramukhi Nambiar's father who owned a successful running chemical factory.
- 9. Reasons for delay in reporting by the complainant/informant: No Delay
- 10. Inquest Report/ U.D. case No., if any: N.A.
- 11. First Information contents: My name is Raghunathan Nair, I have been the head of security for Mr. Ramakrishna Nambiar for the past 10 years, on 16<sup>th</sup> March, 2020 I allowed two technicians, Santa and Banta who came from Raghav Chettiar's office. I saw them work on the terrace; they were supposed to be fixing the A.C. Duct. On 17<sup>th</sup> March at 8:00 AM which is when I check all CCTV footage, a little while later than that, I heard a lot of shouting from the house mainly of Mrs. Chandramukhi Nambiar, I ran inside to go have a look if something was wrong and I was shocked to see Mr. Ramakrishna Nambiar and his son Mr. Vikram Nambiar dead inside their room. Mr. Ramakrishnan had his hand slit; I even saw Chote Lal lying motionless on the floor. I





saw the personal manager Mr. Santhanam Sivaraj standing right outside the door and Mrs. Nambiar crying out loudly.

**12. Action taken:** A case of murder is registered. The investigation has been handed over to ACP Bhalerao Singham, Chungam Police station in Kottayam.

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

#### R.O.A.C.

13. Signature/ thumb impression of the complainant/ informant:

Sd/-

14. Signature of Officer In-charge- P.S.:

Sd/-

15. Date and time of dispatch to the Court: 17.03.2020 at 9:20 A.M.

SLCV





#### ANNEXURE NO. 2 INOUEST REPORT

1. District: Srivijaypura

2. Police Station: Chungam

3. Date and Time of receiving information about the death: 8:30 A.M., 17/03/2020

4. Details of the Witnesses:

(i)Name: Ramu Kaka

Age: 23 years

Residing at: #123, KGF Layout Bandu Nagar, Srivijaypura City – 123 635

(ii) Name: Raghunathan Nair

Age: 47 years

Residing at: No.2/25, Howlere Apartments, Romany Road, Srivijaypura City – 123 039

**5. Details of the Deceased:** 

(i) Name: Mr. Ramakrishna Nambiar

Age: 68 years

Sex: Male

Address: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

(ii) Name: Mr. Vikram Nambiar

Age: 29 years

Sex: Male

Address: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

6. By whom first found dead: Chandramukhi Nambiar, Raghunathan Nair - Head of Security and

Manager who were at the residence of the deceased at the time of death.

**7. Time and place where body was found:** The body was found at around 07:00 A.M.

8. Last person to see the deceased alive: Chandramukhi Nambiar

9. Time and place where person was last seen alive: 9:05 P.M.., Residence of deceased.

**10. Dead body identified by:** BaaDhar Card found in place of death (Bedroom).

11. Marks of Identification, if any: None

12. Height and weight of the deceased: (i) 5 ft - 11 inch, 80.5 kgs; (ii) 6 ft - 2 inch, 78 kgs

13. Relatives present at the inquest: None





14. Spot where corpse was found: Bedroom

15. Status of body when found: The deceased were lying on the floor and bed

**16. Injuries and marks on the body:** Cut on wrist of deceased 1.

17. Nature of wounds: The vein near the place of injury was cut causing excessive bleeding.

**18. Condition of clothes/ ornaments:** Deceased was wearing night pants and T-shirt with minor tears and blood splotches on the T-shirt.

19. Marks of violence or struggle: N.A.

**20. Apparent cause of death:** (i) Excessive bleeding caused through slit on wrist by a sharp object.

(ii) Suffocation or Asphyxiation.

21. If any person suspected, who and why: Chandramukhi Nambiar

22. Present status of body: Bodies have been sent to Binod Hospital for autopsy.

Witness 1 – Ramu Kaka 1: Sd/-

Witness 2 – Raghunathan Nair: Sd/-

Sign of the I.O.: Sd/-

Name of the I.O.: Bhale Rao Singham

**Rank:** ACP Chungam P.S.





## ANNEXURE NO. 3 POST MORTEM REPORT

Name of the Institution: Chinnaswamy Institute of Medical Sciences

Name of Doctor conducting Autopsy: Dr. Sunil Shetty

**Post Mortem Report No:** 981/2020

Date and Time of Receipt of Body: 17.03.2020, 9 A.M

Date and Time of Commencement of Autopsy: 17.03.2020, 9.30 A.M

Date and Time of Conclusion of Autopsy: 17.03.2020, 12 P.M

Estimated Time of Death: Around 8-9 hours before commencement of Autopsy (Estimated time: 3

A.M to 4 A.M)

**CASE PARTICULARS:** 

Name of Deceased: Mr. Ramakrishna Nambiar

Age: 68 Sex: Male Blood Group: O +ve

ADDRESS: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

BODY IDENTIFIED BY: Chandramukhi, Daughter-in-law of the Deceased

**OBSERVATIONS:** 

**Height:** 5 ft. 9-inch **Weight:** 85 kgs

**Special Identification Features:** Presence of a mole on the upper lip area.

General Observations: Body is that of an adult male in white kurta pajama and later changed into a

hospital gown.

**Rigor Mortis:** Present. Body relatively stiff.





#### **External Examination:**

- 1. Single Slit on the right wrist of the deceased by holding the knife in the right hand. The incised cut is superficial in nature. Wound ranging from 1.5 cm to 2 cm in the skin.
- 2. Swelling found on the right side of the face of the deceased, mostly caused due to falling on the ground after being subconscious.
- 3. The neck, back, chest and the abdomen have no masses or scars.
- 4. Body of the deceased is blue due to lack of oxygen.
- 5. Air passage appears to be blocked due to presence of minute particles of black soot

#### **Internal Examination:**

- 1. Presence of Alcohol in Blood.
- **2.** Excessive loss of blood due to slit on hand.
- **3.** Presence of soft-tissue injuries.

#### **OPINION:**

The death of the deceased has occurred due to a single slit on the right hand by holding the knife in the right hand. Slit on wrist is superficial and not deep in nature. Intoxication can also be concluded as a reason for the death of the deceased. The death has occurred between 3 A.M to 4 A.M. Due to excessive bleeding the deceased was mostly unconscious with intervals lasting a few seconds of slight consciousness just before death. There are no signs of struggle on the patient.





#### **ANNEXURE NO. 4**

#### **PROPERTY SEIZURE MEMO**

1. **District:** Srivijayapura **P.S:** Chungam

3. Acts and section(s): (a) Act:

**(b) Section(s):** 

4. Property seized/ recovered/ discovered at: Home of deceased

(a) Date:

(b) Time:

(c) Address of the place from where seized/ recovered/ discovered: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

#### 5. Witness:

(i) Name: Ramu Kaka

Age: 23 years

Residence: #123, KGF Layout, Bandu Nagar, Srivajayapura City – 123 635

(ii) Name: Raghunathan Nair

**Age:** 36 years

Residence: # 127, Howlere Apartments, Bandu Nagar, Srivijayapura City – 123 635

- 6. Action taken/recommended for disposal of perishable property: NIL
- 7. Action taken/ recommended for keeping of valuable property: Packed, sealed and sent to safe custody for further investigation.
- **8.** Identification required: Yes
- 9. Details of properties seized/ recovered:

Sl. No.	Property Description	I.O. Marking
1.	Knife with Deceased 1's blood	1A/351/2020
2.	Wallet of Deceased 1	1B/351/2020
3.	Wallet of Deceased 2	1C/351/2020
4.	Mobile Phone of Deceased 1	1D/351/2020
5.	Mobile Phone of Deceased 2	1E/351/2020







1A/351/2020



1B/351/2020







1C/351/2020



1D/351/2020







Witness 1: Ramu Kaka Sd/- Name of the I.O.: Bhale Rao Singham

Witness 2: Raghunathan Nair: Sd/- Rank: ACP, Chungam P.S.

Signature: Sd/-





## ANNEXURE NO. 5 SCENE OF OFFENCE -PANCHANAMA

Pancha No. 1: Date: 17/03/2020

Mr. Vivek Raina Age: 35 years

Residing at #221B Bakers Street, Srivijaypura

Pancha No. 2:

Mrs Kiran Raina Age: 33 years

**Residing at #221B** Bakers Street, Srivijaypura

We, the above mentioned Panchas were called by ACP Bhale Rao Singham, the Investigating Officer to act as Panchas in the present case on 16th March, 2020 at about 9:00 AM.

We are the neighbours of Mr. Ramakrishna since last 5 years and told the police how lately since last one year we have been observing a loud exchange of words between Chandramukhi and Vikram every night.

The investigating team with gloved hands and masked mouth entered the room. With all the precautions they collected the blood coated knife which was on the ground and marked it as 1A/505/2020. In addition to that we found the wallets and phones of the two deceased and sealed it in a transparent package with I.O marking of the wallet for deceased 1 1B/505/2020 and for deceased 2 1C/505/2020. As for the phone with the I.O marking as 1C/505/2020 for deceased 1 and 1D/505/2020 for deceased 2. We even discovered a personal diary of deceased one on the table next to the bed with a suicide note written in it and the same was marked as 1E/505/2020.

Except for the above-mentioned items, no other item/property was seized by the police in our presence. The Panchanama concluded at about 10:00A.M. on the same day and it was conducted in an orderly manner. The contents of the Panchanama were read over to us and are correctly recorded.

Pancha No. 1- Vivek Raina: Sd/- Name of the I.O.: Mr.Bhale Rao Singham

Pancha No. 2- Kiran Raina: Sd/-

Rank: ACP, Chungam Police Station

Sign of the I.O.:Sd/-





## ANNEXURE NO. 6 CASUALTY CERTIFICATE

**1. Serial No:** 789/2020

2. Name of Doctor: Swati Sinha

**3. Designation:** M.B.B.S.

4. Date and time of examination: 17/03/2020, 8 AM

**5. Name:** Ramakrishna Nambiar **Age:** 68 years. **Sex:** Male

**6. Address:** No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

7. Identification marks: none

8. Brought by (Name & address): Mythili Suresh, Paramedic

9. History and alleged cause of injury:

Injury caused by slit on his right wrist. Excessive flow of blood caused by a deep cut. Subsequently, this led to dissection of artery and heart failure.

#### 10. Details of injuries:

The cut was deep with excessive flow of death by the time he reached the hospital. Dissection of artery can be seen. Blood is deoxygenated and is purplish red in color.

11. Number of additional sheets (if any): None

**12. Whether admitted or not:** Not Admitted (was dead before being admitted in the hospital)

**13. Opinion:** Could be / could not be as alleged.

**14. Injuries appeared:** Old.

Signature of Issuing Officer: Sd/Signature of Doctor: Sd/-

Mahesh Srinath Swati Sinha





## ANNEXURE NO. 7 CASUALTY CERTIFICATE

1. Serial No: 800/2020

2. Name of Doctor: Swati Sinha

**3. Designation:** M.B.B.S.

4. Date and time of examination: 17/03/2020, 9 AM

**5. Name:** Vikram Nambiar **Age:** 34 years. **Sex:** Male

**6. Address:** No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

7. Identification marks: birthmark under chin

8. Brought by (Name & address): Mythili Suresh, Paramedic

9. History and alleged cause of injury:

Injury caused by excessive buildup of carbon monoxide in the bloodstream due to long exposure. The body had replaced the oxygen in the red blood cells with carbon monoxide which led to serious tissue damage and eventually led to fatal death.

#### 10. Details of injuries:

There was a long exposure to carbon monoxide in an improperly ventilated room, the patient was not taken to the ER at the right time. The Carbon Monoxide had been accumulated in such a way that it did not allow oxygen to get to the heart and other organs of the patient. Hence causing the poisoning.

- 11. Number of additional sheets (if any): None
- **12.** Whether admitted or not: Not Admitted (was dead before being admitted in the hospital)
- **13. Opinion:** Could be / could not be as alleged.
- 14. Injuries appeared:Old.

Signature of Issuing Officer: Sd/Signature of Doctor: Sd/-

Mahesh Srinath Swati Sinha





# ANNEXURE NO. 8 POST MORTEM REPORT

NAME OF THE INSTITUION: Chinnaswamy Institute of Medical Sciences

NAME OF DOCTOR CONDUCTING AUTOPSY: Dr. Ramaraju

**POST MORTEM REPORT NO:** 980/2020

DATE AND TIME OF RECEIPT OF BODY: 9 AM., 17.03.2020

DATE AND TIME OF COMMENCEMENT OF AUTOPSY: 17.03.2020, 9:20 AM

DATE AND TIME OF CONCLUSION OF AUTOPSY: 17.03.2020, 11:00 AM

**ESTIMATED TIME OF DEATH:** Around 8-9 hours before commencement of Autopsy (Estimated

time: 3 A.M to 4 A.M)

#### **CASE PARTICULARS:**

1. Name of Deceased: Mr. Ramakrishna Nambiar

**Age:** 68 **Sex:** Male **Blood Group:** O +ve

**ADDRESS:**No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

BODY IDENTIFIED BY: Chadramukhi Nambiar, Daughter-in-law of the Deceased

**OBSERVATIONS:** 

**Height:** 5 ft. 9-inch **Weight:** 85 kgs

**Special Identification Features:** Presence of a mole on the upper lip area.

**General Observations:** Body is that of an adult male, wearing track pants and a t-shirt that was blood stained. Shifted into hospital gown.

**Rigor Mortis:** Present. Body still relatively stiff.

**External Examination:** 

1. External Laceration of the Radial Artery at the left wrist of the deceased. Wound ranging from 2.5

to 3.5 deep in the skin.

**2.** The neck, back, chest and the abdomen have no masses or scars.

**3.** Body of the deceased is blue due to lack of oxygen.

**Internal Examination:** 

1. Excessive loss of blood due to slit on hand.

2. Presence of soft-tissue injuries.

**OPINION:** 

The death has occurred due to exsanguination. The death has occurred between 3 A.M to 4 A.M. Due to excessive bleeding the deceased was mostly unconscious with intervals lasting a few seconds of slight consciousness just before death. The death occurred after the slitting of the wrist. There are no

signs of struggle or strain. There are traces of anti-depressants found in his body.

2. Name of Deceased: Mr. Vikram Nambiar

**Age:** 45

Sex: Male

**Blood Group:** O +ve

**ADDRESS:**No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

**BODY IDENTIFIED BY:** Chadramukhi Nambiar, Wife of the Deceased

**OBSERVATIONS:** 





**Height:** 6 ft. **Weight:** 80 kgs

**Special Identification Features:** Green patch on left side of his forehead.

**General Observations:** Body is that of an adult male, wearing a t-shirt and a Lungi. Shifted into a hospital gown.

**Rigor Mortis:** Present. Body still relatively stiff.

#### **External Examination:**

- 1. Body of the deceased is blue in color.
- 2. The neck, back, chest and the abdomen have no masses or scars.

#### **Internal Examination:**

- 1. Insufficient oxygenation detected- Resulted in tissue hypoxia
- 2. Heart failure

#### **OPINION:**

The death has occurred due to the intoxication of Carbon Monoxide within the body. The presence of Carbon Monoxide led to body deoxygenating and subsequent heart failure. The death occurred between 4-5 AM.





#### **ANNEXURE NO.9**

## MEDICO- LEGAL INJURY CERTIFICATEBINOD HOSPITAL

**1. Serial No.:**CC32/2020 **Date**: 17.03.2020

a. Name of the person: Chote Lal

b. **Age:**23 years

c. **Sex:** Male

d. Address: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987,

e. **Height and Weight:** 5 ft. 5 inches, 69kgs

f. Ref. Crime No.986/2020of Chungam PoliceStation

g. **Alleged Time of Offence:** about 7.00A.M.

h. Consent for Examination: Received frompatient's employees

i. Name and Designation of Medical Officer who conducted the Examination: Dr. Ramaraju and Dr. Malli Venkatesh, Assistant Medical Officer

j. **Date and Time of Examination**: 17/03/2020 at about 6:30 P.M.

k. **Marks of Identification:** Birthmark under chin

1. **Type of Injury:** cut on the right side of the face

m. Alleged cause of injury: Injury caused due to cut by a knife on the face of the patient

n. **Details of Injuries**: incised injury of the left side of the face of the patient mostly caused due to falling on a sharp object

o. Whether admitted or not: admitted into the hospital as in a state of coma after cleaning of the wound.

Sd/-

Dr. Ramaraju Senior Doctor, Binod Hospital





#### ANNEXURE NO. 10 FORENSIC EXAMINATION REPORT

**Examination Report Number: CFSL 345/BA/52/20 Dated:** 

To,

ACP Mr.

**Bhale** 

Please quote the Report number and date in all correspondence and summons.

Rao

This report is per se admissible under section 45 of the Evidence Act.

**Singham** 

**Chungam Police Station** 

From: Nikita Gandhi (M.Sc. Forensic Science)

Re:Ramakrishna Nambiar: Examination of the wounded wrist. (FIR No. 351/2020)

I have duly attached the forensic report of the scene hereby in connection with case FIR No. 351/2020

(Dated 17.03.2020).

#### **Introduction:**

The FIR was filed on 17.03.2020 and I received the samples of the scene from Mr. Bhale Rao Singham. The samples were swabs from the wrist cut of the deceased and the floor wherein the blood was spilled. I was present at the scene right before the body was about to be sent across for the autopsy. I was specifically asked to work on the blood sampling report for the aforementioned.

#### **Analysis:**

The blood sample from the swab of the slit wrist and the one found on the floor do not match. The deceased happens to be O+ve and the blood sample of the floor is A+ve. The cells were red-purplish in colour. The blood flow stagnated and did not flow from the elbow.

#### **Opinion:**

The slit took place after the death of the deceased. This is a case of intoxication caused from the inhalation or accumulation of carbon monoxide through the system. The sample from the floor is different, however the cause of death is based on the presumptive opinion from my years of experience. Hence, the blood sample found on the floor is irrelevant in the present case.





## ANNEXURE NO. 11 BLOOD ANALYSIS REPORT OF RAMAKRISHNA NAMBIAR

BLOOD	ANTIGEN	ANTI BODY	AGGLUTINATION	AGGLUTINATION
TYPE		PRODUCED	WITH ANTI-A	WITH ANTI-B
			SERUM	SERUM
A	NONE	NONE	NONE	NONE
В	NONE	NONE	NONE	NONE
O	NONE	ANTI- A & ANTI- B	NO	NO
AB	NONE	NONE	NONE	NONE

**BLO** 

#### OD ANALYSIS REPORT OF BLOOD SAMPLE PRODUCED

BLOOD	ANTIGEN	ANTIBODY	AGGLUTINATION WITH	AGGLUTINATION
TYPE		PRODUCED	ANTI-A SERUM	WITH ANTI-B
				SERUM
A	A	ANTI -B	YES	NO
В	NONE	NONE	NONE	NONE
О	NONE	NONE	NONE	NONE
AB	NONE	NONE	NONE	NONE

#### **OBSERVATIONS:**

After examining the blood sample from the body of the deceased and the blood sample produced to us from the spot of crime, we came to the conclusion that the blood sample reports don't match with each other. The blood type of the deceased is O type but that of the sample produced is A type. Hence, the blood of deceased isn't the one found on the crime scene.





#### **ANNEXURE NO. 12**

#### **MEDICAL FORENSIC EXAMINER**

I am Nikita Gandhi, the forensic examiner and I have made the report regarding Mr. Ramakrishna Nambiar's blood samples. I am 35 years old and I have done my M.Sc degree in Forensic Sciences.

I have been in this field for 7 years and I have worked on several cases and most of my reports have been accurate even though I always respect the presumptive nature of my opinions. I got involved when Mr. Bhale Rao Singham called me and told me that I had to be there in the scene. I immediately rushed and when I reached the scene, the bodies were being lifted and Mr. Singham gave me the samples. Even though I had the responsibility to take the samples myself; I obliged to the different turn of events that took place. I was told by Mr. Singham that I had to give a report which I did eventually.

I have stated that the deceased could have died out of accumulation of carbon monoxide in his system. And the slit on his wrist was made after the death. However, what I found the most striking was the fact that the blood samples that I have received from Mr. Singham were different from each other.

I suspect that there has been a fallacy in the assigning of the samples, otherwise I have never been involved or even heard of a case where the blood samples from the deceased were different, because that's definitely not possible.





## ANNEXURE NO. 13 WITNESS STATEMENT OF MR. MURGAN KOHLI

My name is Murgan Kohli. I am 33 years old. I work for Coolway Air Conditioners. I am a technician and have a diploma. I was asked to analyze the A/C unit which is a product of our company. In my examination I have come to a conclusion that the AC unit has been tampered with. I will elaborate on my reasoning. The product is no longer covered by the warranty schemes of our company in light of the tampering.

There are three main irregularities which brought me to this conclusion. The first one being that a number of external modifications had been made to the AC unit located on the terrace. A big tube had been attached to the face of the unit. The tube was connected to the part of the AC which bypassed the filter and directly into the tubes which carried the Filtered air into the room. The second irregularity is the installation of an incompatible A.C. motor. It seemed like the motor had been recently installed as it looked like it had not been used a lot.

The A.C. motor was a model which produced more power than the compatible motor. This would enable it to cool a room faster by increasing the rate of flow of air into a room. The third and final irregularity is the presence of soot in a number of tubes of the A.C. Unit. Soot is generally only found in the filter of the A.C. unit. However, traces of soot were found in a number of tubes. The newly attached tube had a rather large amount of soot on its inside. Soot is usually found in places where gasses like Carbon Dioxide or Carbon Monoxide pass through. It looks like a high concentration of a Carbon gas had been forced through the newly attached tube. These were the three reasons behind the conclusion I reached.





# ANNEXURE NO. 14 WITNESS STATEMENTS RECORDED u/s. 161 Cr.P.C WITNESS STATEMENT OF Mr. RAGHUNATHAN NAIR

My name is Mr. Raghunathan Nair. I am 47 years old. I have served in the armed forces and after voluntary retirement became the Head of Security for Mr. Ramakrishna Nambiar. In the capacity of my role I was responsible for the security of Sir and sometimes members of his family if asked to. I was also expected to work full time and that is why I lived in Sir's house in the servant's quarters building. I do not have work timings as such and I would also check the premises during the night also to make sure that the family of Sir is safe.

On that day sir passed I was on duty. During the day there were A.C. technicians who came as they claimed there was an issue with the AC in one of the rooms and Chandramukhi Ma'am had asked them to come. I called up ma'am who confirmed that she indeed called them. If my memory serves me right there were 2 technicians who came. I led them to the terrace where the A.C. units were kept and let them carry out their work and there was a lot of noise. The work lasted about 1.5-2 hours, following which they were escorted out of the premises. That night as I was doing my routine inspections before going to sleep. I heard Vikram Sir and Chandramukhi Ma'am having a loud fight. Ma'am was using a lot of expletives and Sir soon stormed out of the room. He slammed the door. I saw Sir then go to his father's room to sleep. I also heard the sounds of metal sheets being hammered. I soon just continued with my checking and soon retired to my quarters to sleep. I woke up at around 3A.M. because the electricity went off. I soon asked one of the guards on duty to put on the generator and in about 5 minutes the generator was put on. It stayed on for a rather long time as current was restored only at 5:30 AM. Sir usually wakes up at 6A.M. so I wake up at 5A.M. to practice yoga and freshen up before starting the day. When I went to sir's room at 6A.M. the door was locked. I opened the door and to my surprise I found Chote Lal on the floor unconscious and tea was spilt on the floor. There was a very odd smell in the room and I immediately opened some windows in order to let fresh air in as the A.C. was on. To my horror Nambiar Sir had his wrist slit and Vikram Sir was also dead as he was not breathing. On Sir's bed stand there was a note. As I saw that Chote Lal was still breathing a little I called for him to be put in a car and taken at once to the hospital. I was deeply traumatized by what I saw that day and that memory still haunts me. I do not believe that Sir was suicidal in any way. I hope that the real culprits are arrested & we get justice





## ANNEXURE NO. 15 WITNESS STATEMENT OF Ms. NEHA KAPOOR

I am Neha Kapoor. I am 55 years old and currently working as the Secretary of Mr. Ramakrishna Nambiar in the Company Nambiar and Sons. Nambiar and Sons is a company which deals with Manufacturing of products and appliances. Our company is around 30 years old and has a reputed name in the industry. We soon started a subsidiary company in order to manufacture chemicals as Mr. Nambiar saw an opportunity to make money and firmly establish the brand in the sector.

Mr. Ramakrishna Nambiar's new venture had caught the eye of an Investor Mr. Zhou who was looking for companies to invest in the Chemical production sector. Mr. Ramakrishna Nambiar however had a competitor in the form of Chettiar Chemicals. Mr. Zhou had said that the deal would go to either one of the parties. In response to this Mr. Chettiar came to meet Mr. Ramakrishna Nambiar in the office of Singh and Sons. Mr. Chettiar accused Mr. Nambiar of trying to monopolize the market. The talks soon turned into arguments with Mr. Chettiar threatening to call miscreants in order to ransack the office of Mr. Nambiar if he did not pull out of the deal among other threats. He then swore to make sure Singh and Sons does not get the deal before he stormed out.

We then received the intimation from Mr. Zhou on the 16<sup>th</sup> of March that he was ready to invest in our company as our past records we incurred large profits and our brand was reputed. Mr. Nambiar was overjoyed with this news. He had told me to come to his house at 6 AM as there was a lot of paperwork sent by the Lawyers of Mr. Zhou which had been sent in order for the investment to be finalized. On reaching there I was shocked by the news that Mr. Nambiar was dead. Mr. Nambiar did not ever display any suicidal tendencies and we often spent a lot of time discussing personal matters relating to our families as I had worked with him for close to 10 years. I reject the notion that he committed suicide and hope that the real culprits are soon found and punished.





## ANNEXURE NO. 16 WITNESS STATEMENT OF NAVEEN CHACKO

Myself Naveen Chacko. I am 34 years old. I have been working as driver for Mr. Ramakrishna Nambiar for 5 years now. I am the Main driver for Mr. Nambiar and my duty starts from 6 in the morning to 6 in the evening. Nambiar Saab always treated me with respect and would help me financially in my times of need. I was loyal to Saab.

I had previously driven Saab to his business meetings and had driven Chandramukhi Ma'am around also many times. Nambiar Saab was however more friendly to me and Chandramukhi Ma'am never used to interact with me much. When she did, she was arrogant and rude. On the Night of 16<sup>th</sup> March Saab was very happy. He told me that today was a day of celebration and as I was driving him back home, he stopped and bought sweets for not only the family but also all those who worked for him. He called it the happiest day in his life. Seeing Saab in such a happy mode made me also very happy. I went to sleep very happy that night but I could never predict the situation I would wake up in.

On that day Nair Saab has told me that something had happened to Chote Lal and I had to take him to the hospital immediately. I put him into the car and drove as fast as I can to the nearest hospital, Binod Hospital. I and Chote Lal are very close as we come from the same village and share the same room in Saab's house. I was very worried. After we reached hospital, I told them I was from Mr. Ramakrishna Nambiar and showed ID card after which they took Chote Lal and put him in the ICU. They told me his condition was serious and that they don't know if he will survive. I was very scared and started praying. After sometime I got the news that Nambiar Saab and his son had also died. I fainted out of shock and was then woken up.

I pray that whoever did this to Nambiar Saab, Vikram Saab and Chote Lal bhai be brought to justice. I also curse those who did it and pray that they suffer for their evil deeds.





## ANNEXURE NO. 17 WITNESS STATEMENT OF VIVEK RAINA

My name is Vivek Raina and I am 33 years old. I am a mechanical engineer in a private company. I have been happily married since last 2 years. Mr. Ramakrishna was my neighbor for 5 years now. My interaction with him was very rare but I shared a good bond with his son Vikram. We used to talk frequently about our respective lives and jobs. Few days ago, he told me about his new deal with a foreign company and how they took loans from the banks to open the launch the new factory. He was worried about this new development and since then I observed him smoking even more, I tried to stop him once or twice but it was of no use since he used to get angry in an instant.

Me and my wife were a witness to his and his wife Chandramukhi's fights every now and then. A tempo came late on the evening of 16th March,2020. The tempo stayed there for hardly 15 minutes. The same night we heard a huge fight between the couple again at around 11:00 P.M. This fight seemed to be loudest and longer one than the usual. There was even an electricity cut at late night for around three hours which was unusual for a Porsche locality like ours. Next morning, we heard the siren of ambulance at around 8AM and we rushed out to see what was going on. Me and my wife have informed about all this to the ACP as well.





#### ANNEXURE NO. 18 STATEMENT OF RAGHAV CHETTIAR

My name is Raghav Chettiar and I'm 66 years old. I am the owner of "Chettiar Chemicals" which is an industry that deals with supplying chemicals to the private companies and factories.

My daughter Chandramukhi got married 1 year ago to Vikram. Vikram was a very respectful and a caring man. I was sure that he would take a proper care of my daughter since I always wanted the best for her.

Vikram was the son of my good old friend Ramakrishna or Rama as fondly I used to call him. Rama and I met years ago in a common friend's party. He was an ambitious man with the will to achieve whatever he set his eyes on without thinking about the consequences. He was a respected man in the market and his field of business and everyone looked up to him. I admired this quality to give our best from him but I was concerned for him since his health was being affected because of the increasing workload. He was a chain smoker too which added to the cause. Looking at me being so worried Chandramukhi took extra care of him and helped him with anything he wanted. She quit her job as a chemical engineer in a private company only to take care of her old father in law.

On 2nd Feb, 2020 we were approached by a foreign investor who wanted to invest in one of the chemical industries in the town since they observed the growing scope for it in the market. Since I had been in this business for around 40 years, I was confident that I will be getting this deal. To my surprise, I got to know that Rama had approached them for the deal too.

Within a month, I heard the news that he had started the work for his new venture with respect to producing chemicals at a large scale. On 13th March, I went to meet Rama in his office and spoke to him about his new start up and the investors deal. I explained it to him that how he is aging and there was absolutely no necessity to sign this deal. I couldn't see my friend's health deteriorating in front of myself and in distress left the place.

On 16th March, I got to know that the deal was given to Rama and I was really happy for him but at the same time I felt that I missed on a great opportunity. If only I would've been a little sterner and intimidating with my voice while I met Rama, he would've taken back his name from the list of competitors. The next day morning at around 7:15 A.M. all I remember was getting a call from my daughter who was shedding tears and informed in that state about the sad demise of her father in law





Rama and her husband Vikram. I rushed to her place the as soon as possible.

#### ANNEXURE NO. 19 STATEMENT OF CHANDRAMUKHI NAMBIAR

I am Chandramukhi Nambiar daughter of Mr. Raghav Chettiar. I am 25 years old. I have done my graduation in chemical engineering from Dr Bruce Banner College of Engineering in USA. After returning to Srivijaypura I started working as a Lab Analyst in a private company called Stark and Co. I was soon asked to marry someone and then within no time my father made me meet Vikram the son of his old friend. I still remember meeting Vikram for the first time, he seemed to be a gentle and a very sophisticated man. He was well disciplined and liked by everyone in my family. We got married 1 year ago. It was slowly in the course of time after marriage that we started getting affectionate and caring towards each other.

My father is the owner of the industry "Chettiar Chemicals". I often lent some advice to him with matters regarding to chemicals. My father cared a lot for my father in law and he even requested me to take more care of him and meet his needs. My father in law was ignorant to his health and aging problems. He was a chain smoker and even after continuously asking him to stop he paid no heed to our requests.

My husband too was a chain smoker. I got to know this after the marriage. He used to smoke in the house all the time which was the reason for most of our fights. I was tired of asking him to quit it because it affected me. I always complained about how it was getting difficult for me to breathe inside the house because of the two chain smokers I was handling. I had in fact warned him several times. He used to get offended in no time whenever I used to talk about his father.

On 2nd February, 2020 I got to know about the new industry my father in law was going to launch. He wanted me to take care of it since it dealt with chemicals too. I was delighted and couldn't wait for this opportunity. Soon, I got to know the real reason behind it and I was stuck in a dilemma. I had to get rid of this situation somehow by putting an end to all this.

On 16th March,2020 my father in law walked into the hall where we were having breakfast and suddenly in his snapped at us and complained about how in a house of such a great industrialist a mere Air Conditioner wasn't cooling properly. He kept shouting at us and he even spoke about my father and asked me what manners had he imparted in me. He even said that once he gets the deal from the foreign investor and snatch it from my father, he shall make the entire house air conditioned with





brand new technology and sensor cooling. His tone was insulting and patronizing but I volunteered

get the AC repaired by that night.

The same day we got to know that the deal of the foreign investor was given to my father in law. I had mixed emotions. I called the receptionist from my father's industry and asked him to send 2 technicians to repair the AC. Santa and Banta were the two loyal technicians of the industry who came by early evening. I asked my father-in-law's manager to escort them inside the house and guide them to the air duct.

That night my husband smoked a lot in happiness which was getting to my nerve. I told him that it was my father who deserved it since he has been in the same field for years now, to which he replied back by stating that my dad wasn't smart enough to crack the deal. That moment I could have crossed my limits and given him a proper reply in a different way that would make him beg me for mercy for saying that. I eventually just told him that in today's world hard work has no recognition it is about give and take of money and that's how his father got the deal too. I could feel him getting annoyed and he eventually left the room by slamming the door.

The next morning, I am suddenly woken up by the personal manager who shouts and screams along with the head of security, near my door at around 7am. I run towards the room of my father in law and I was shocked to see my father-in-law and Vikram lying motionless there. The servant was on the floor. I panicked and immediately called my father.





#### ANNEXURE NO. 20 STATEMENT OF SANTHANAM SHIVARAJ

My name is Santhanam Shivraj, I was the personal manager of Mr. Ramakrishna Nambiar since last 10 years. I was assigned the task to help Mr. Ramakrishna keep a track of events and his daily schedule. My work used to start every morning waiting for him outside his door till the time he got fresh and was ready to work. He used to believe in waking up early and work hard to earn every single penny. The only thing I was allergic to was smoking and he was a chain smoker, following him day and night made me a passive smoker too. I started carrying a mask with me since then.

In the evening of 16th March, 2020, I was asked to guide two technicians by Madam Chandramukhi from the gate to the house since I am aware of the nook and corner of the house. They were called from the "Chettiar Chemicals" industry to repair the Air Conditioner. I took them to the room of Ramakrishna sir and then to the terrace where the air duct was. It took them around half an hour to repair. I kept an eye on them throughout.

On the morning of 16th March,2020 when I came to stand outside the door of Sir, he didn't respond for a while. I thought he must be deep asleep; I knocked the door and climbed the terrace for a while. On the way I saw Chote Lal taking bed tea Ramakrishna Sir. After coming back, I opened the door and saw that Ramakrishna sir and Vikram Sir were not responding to me at all. I screamed and shook them. Chote Lal was on the ground. I could see blood around the wrist of Ramakrishna sir. By then head of security, Raghu came and I went to wake Madam up and by that time Raghu called the police.





## ANNEXURE NO. 21 POST MORTEM REPORT

NAME OF THE INSTITUION: Chinnaswamy Institute of Medical Sciences

NAME OF DOCTOR CONDUCTING AUTOPSY: Dr. Malli Venkatesh

**POST MORTEM REPORT NO:** 1001/2020

DATE AND TIME OF RECEIPT OF BODY: 9 AM., 17.03.2020

DATE AND TIME OF COMMENCEMENT OF AUTOPSY: 17.03.2020, 9:20 AM

DATE AND TIME OF CONCLUSION OF AUTOPSY: 17.03.2020, 11:00 AM

**ESTIMATED TIME OF DEATH:** Around 8-9 hours before commencement of Autopsy (Estimated

time: 3 A.M to 4 A.M)

#### **CASE PARTICULARS:**

Name of Deceased: Mr. Ramakrishna Nambiar

**Age:** 68 **Sex:** Male **Blood Group:** O +ve

**ADDRESS:** 

BODY IDENTIFIED BY: Chadramukhi Nambiar, Daughter-in-law of the Deceased

#### **OBSERVATIONS:**

**Height:** 5 ft. 9-inch **Weight:** 85 kgs

**Special Identification Features:** Presence of a mole on the upper lip area.

**General Observations:** Body is that of an adult male, wearing track pants and a t-shirt that was blood stained. Shifted into hospital gown.





**Rigor Mortis:** Present. Body still relatively stiff.

#### **External Examination:**

- 1. External Laceration of the Radial Artery at the left wrist of the deceased. Wound ranging from 2.5 to 3.5 deep in the skin.
- 2. The neck, back, chest and the abdomen have no masses or scars.
- 3. Body of the deceased is blue due to lack of oxygen.
- 4. Red blood cells are red-purplish in color, showing bleeding after death.
- 5. Air passage shows signs of blockage due t presence of minute particles of black soot.

#### **Internal Examination:**

- 1. Excessive loss of blood due to slit on hand.
- **2.** Presence of soft-tissue injuries.
- 3. Lack of oxygen found in blood.
- 4. Presence of Carbon Monoxide in Blood.

#### **OPINION:**

The death has occurred due to intoxication of the lungs caused due to the inhalation of carbon monoxide gas. The right wrist was slit after the death.

2. Name of Deceased: Mr. Vikram Nambiar

**Age:** 45 **Sex:** Male **Blood Group:** O +ve

**ADDRESS**: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

**BODY IDENTIFIED BY:** Chadramukhi Nambiar, Wife of the Deceased

#### **OBSERVATIONS:**





**Height:** 6 ft. **Weight:** 80 kgs

**Special Identification Features:** Green patch on left side of his forehead.

**General Observations:** Body is that of an adult male, wearing a t-shirt and a Lungi. Shifted into a hospital gown.

**Rigor Mortis:** Present. Body still relatively stiff.

#### **External Examination:**

- 3. Body of the deceased is blue in color.
- **4.** The neck, back, chest and the abdomen have no masses or scars.

#### **Internal Examination:**

- 3. Insufficient oxygenation detected- Resulted in tissue hypoxia
- 4. Heart failure

#### **OPINION:**

The death has occurred due to the intoxication of Carbon Monoxide within the body. The presence of Carbon Monoxide led to body deoxygenating and subsequent heart failure. The death occurred between 4-5 AM.





## ANNEXURE NO. 22 BLOOD EXAMINATION REPORT OF ACCUSED No.1

- 1. MEDICAL EXAMINATION FINDINGS FOR CASE NO: 505/2020
- 2. DATE AND HOUR OF STARTING EXAMINATION: 18th March, 2020, 4:15 P.M.
- 3. DATE AND HOUR OF CONCLUDING EXAMINATION: 18th March, 2020, 4:30 P.M.
- 4. NAME OF THE ACCUSED: Mr. Raghav Chettiar

S/O: Veeraraghavan Chettiar AGE: 66 years SEX: Male

5. ADDRESS: #15, Kamalam, Srivijaypura- 90

6. HEIGHT: 5ft 8inches WEIGHT: 68kgs PHYSIQUE: Middle Aged Spread

7. SPECIAL IDENTIFICATION FEATURE: A scar on the left side of the forehead

Sd/-

Dr. Purvi Reddy

Medical Officer

Chinnaswamy Institute of Medical Sciences





## ANNEXURE NO. 23 BLOOD EXAMINATION REPORT OF ACCUSED NO.2

1. Medical Examination findings for the case: 505/2020

2. Date and hour of starting examination: 18 March 2020, 4:30 P.M

3. Date and hour of concluding examination: 18 March 2020, 4:45 P.M

4. Name of the accused: Ms. Chandramukhi Nambiar

D/O: Raghav Chettiar Age: 25 Yrs. Sex: Female

5. Address: No. 5/25, KGF Layout, Bandu Nagar, Srivijaypura City – 123 987

6. Height: 5 feet 8 inches Weight: 60 kgs Physique: Slender

7. Result of examination: Minor traces of Nicotine found.

Sd/-

Dr. Purvi Reddy

**Medical Officer** 

Chinnaswamy Institute of Medical Sciences





## ANNEXURE NO. 24 BLOOD EXAMINATION REPORT OF ACCUSED NO. 3

1. Medical Examination findings for the case: 505/2020

2. Date and hour of starting examination: 18<sup>th</sup> March 2020, 4:45 P.M

3. Date and hour of concluding examination: 18th March 2020, 5:00 P.M

4. Name of the accused: Santhanam Shivaraj

**5.** S/O: Manohar Shivaraj Age: 45 years Sex: Male

6. Address: No 2, 1st Cross, M-Town, Srivijaypura- 24

7. Height: 5 feet 9 inches Weight: 73 kgs Physique: Built

8. Special Identification Feature: A mole on the left elbow

9. Result of Examination: Minimal traces of Nicotine and Ammonia found in blood

Sd/-

Dr. Purvi Reddy

**Medical Officer** 

Chinnaswamy Institute of Medical Sciences





#### ANNEXURE NO. 25

#### IN THE COURT OF THE 4<sup>TH</sup> ADDITIONAL METROPOLITAN MAGISTRATE, SRIVIJAYPURA CITY

S.C. No.519/2020

In the matter between:

C. C. No. 520/2020

State of Zootopia ... Prosecution

v/s

Mr. Raghav Chettiar and Others

...Defence

#### **ORDER**

(Deemed to be proved)

Whereas the information by virtue of a certificate submitted under Section 65-B of the Indian Evidence Act, 1872 has been laid down before me and a competent expert witness under Section 45-A of the Act has admitted to the genuineness of the produced records relating to a CCTV footage having I.O. Marking as 1D/986/2020. The evidence has been verified as genuine and has been admitted as a valid piece of evidence in the proceedings in the given case.

**Seal**: Deemed to be affixed Signature of the Judge:**Sd/**-

Date: 01.10.2020 Vijay Savarkar





## ANNEXURE NO. 26 SEIZURE MEMO OF DECEASED'S PERSONAL DIARY

10. **District:** Srivijayapura **P.S:** Chungam

12. Acts and section(s): (a) Act:

(b) Section(s):

13. Property seized/ recovered/ discovered at: Home of deceased

(a) Date:

(b) Time:

(c) Address of the place from where seized/recovered/discovered: No. 5/25, Richie Rich Colony, GTB Nagar, Srivijaypura City – 123 987

14. Witness:

(iii) Name: Ramu Kaka

Age: 23 years

Residence: #123, KGF Layout, Bandu Nagar, Srivajayapura City – 123 635

(iv) Name: Raghunathan Nair

Age: 47 years

Residence: # 127, Howlere Apartments, Bandu Nagar, Srivijayapura City – 123 635

15. Action taken/recommended for disposal of perishable property: NIL

**16. Action taken/ recommended for keeping of valuable property:** Packed, sealed and sent to safe custody for further investigation.

17. Identification required: Yes

18. Details of properties seized/recovered:

Sl. No.	Property Description	I.O. Marking
6.	Personal Diary of the Deceased	4A/351/2020







4A/351/2020

Witness 1:Ramu Kaka: Sd/- Name of the I.O.:BhaleRao Singham

Witness 2: Raghunathan Nair: Sd/- Rank: ACP, Chungam P.S.

Signature: Sd/-





#### **ANNEXURE NO. 27**

#### FORENSIC SCIENCE LABORATORY REPORT

#### STATE FORENSIC LABORATORY REPORT

#### **Government of Zootopia**

Regd –BAL (lB)/903/2020 Date:19.03.2020

From,

The Director and Chief Examiner,

State Forensic Laboratory, Chungam,

Srivijaypura

To,

The Investigating Officer ACP BhaleRao Singham Chungam.
Srivijaypura City

#### **<u>CERTIFICATE</u>** OF EXAMINATION:

The articles sent in were received by the State Forensic Laboratory, for examination on 18.03.2020. The articles were received sealed in a manner that corresponds to the materials as were informed to be received, all of which is summarized in the Forensic report.





#### <u>Materials Examined</u> –

MATERIALS EXAMINED	MARKINGS
Blood Stained Knife	B1
(I.O. Marking – 1A/986/2020)	BI
Doorknob	
(I.O. Marking – 2C/986/2020)	D1
Blood Sample of Mr. Ramakrishna Nambiar	R1
Hair Strands Sample of Mr. Ramakrishna Nambiar	H1
Hair Strand Sample of Mr. Vikram Nambiar	H2
Hair Strand Sample of Chote Lal	Н3
Fingerprints of Mr. Santhanam Shivaraj	F1
Fingerprints of Mr. Ramakrishna Nambiar	F2
Fingerprints of Chote Lal	F3

#### Method of Analysis -

The observations and tests conducted were through method of collecting samples found at the scene of offence.

- 1. The samples of bloodwere collected through the way of Benzidine Test or the Presumptive Test. The blood Samples examined here are marked as B1, N1 and S1.
- 2. The blood stains on the knife and handwritten suicide note were examined with respect to the blood type, the size as well as the color as well as any form of other material mixed along with the blood stains found with respect to this investigation.

# (6)

### THE 6<sup>TH</sup> NATIONAL TRIAL ADVOCACY AND JUDGMENT WRITING COMPETITION



- 3. Fingerprints were lifted by using the lifting tape and matched using the Automated Finger print machine.
- 4. Hair strands were also recovered from the floor and the bed of the deceased.

#### Result of the Analysis -

The results of the Benzidine Test as well as the examination conducted on the aforementioned materials procured at the scene of offence or incident are furnished as below –

- 1. The Blood samples of R1 match with the blood sample collected from the knife.
- 2. The fingerprints marked as F1 are found on the Knife.
- 3. The fingerprints (F1) are found on the doorknob.
- 4. The fingerprints (F1) are also found on the handwritten note.
- 5. The fingerprints marked as F2 are found on the knife
- 6. The fingerprints(F2) are found on the handwritten note.
- 7. The fingerprints marked as F3 are found on the doorknob.
- 8. The fingerprints (F3) are found on the knife.
- 9. The Hair strand sample collected and marked as H1 are found on the floor.
- 10. The Hair strand sample collected and marked as H2 are found on the floor.
- 11. The Hair strand sample collected and marked as H3 are found on the floor.
- 12. The Blood sample of R1 match with the blood sample collected from the handwritten note.

Sd/-

Mrs. Savitri Kutty Mr. Kiran Kumar

AssistantDirector ChiefExaminer

Sd/-

Mrs. Anjali KalsiThe Director, State Forensic Laboratory, Chungam, Srivijaypura





## ANNEXURE NO. 28 CONFESSION STATEMENT BY SANTHANAM SHIVARAJ UNDER SECTION 164 CrPC

I am Santhanam Shivaraj. I am 52 Years old. I have been working as Mr. Nambiar's personal manager for 10 years. I am married and hold a Degree in Chemical engineering. I am also part of Nambiar and Sons and regularly accompany Mr. Nambiar to meetings if asked to. However, I sometimes accompany and assist Ms. Chandramukhi in her work if told to by Mr. Nambiar. Ms. Chandramukhi and I maintained a professional relationship during work hours but however she would talk about personal matters while we aren't working. We were close friends and I had introduced her to my wife and she had introduced me to her family too. Her Husband Vivek and her had a very rough relationship. She would tell me about her ordeals almost every day and the mistreatment she suffers at the hands of her husband and father in law. She would also be subjected to physical abuse by her husband and father in law and would often show me her bruises on her hand or sometimes the marks were very visible as they would have been on her face. She would never speak back to her husband and in laws

Ms. Chandramukhi was working very hard to make sure that Chettiar Chemicals gets the investment from Mr. Zhou. She would work long hours and sometimes sleep in the office due to her workload. On the 17<sup>th</sup> however we received the news that Mr. Zhou had decided to invest in Nambiar and Son's. Ms. Chandramukhi was devastated by the news. She hoped to upstage her in-laws by making sure the investment would come to her company over ours. Dejected she returned home that night. At 2 PM she returned home only to see that her Husband and Father in Law were gloating and humiliating her by making derogatory statements about Chettiar Chemicals and her Father. She cracked and shouted back at her husband and in – laws.

Soon after that she called me up and told me that she wanted to kill her father in law. She was willing to offer me a sum of 30 Lakhs if I orchestrated and carried out the murder. As I was aware of the ordeal and sympathized with her, I decided to help her. She told me that she already had a plan and wanted me to come to her house at 8PM. She told me that I should bring a few tools and metal sheets. She told me to go to the AC unit of her Father in laws room which was close to the exhaust pipe for the generator and try making the exhaust pipe redirect its fumes into the room of the father in law using the tools and metal sheets which I promptly did. I was also helped by the fact that a new inlet





pipe had been installed. This made my task much easier. She told me that sometime during the night she would go put off the main switch which would immediately start the generator.

Her Husband and she would go on to have another fight that night and I managed to leave soon after listening to that. The next day I came to the house at about 5:30 and entered the house with a mask on. I first went to the terrace and redirected the exhaust pipe to make it look like nothing had happened. Then I went to the bedroom of Mr. Nambiar. I saw that Chandramukhi husband was also in the room. He had suffocated and died. Her Father in law however had a slight pulse. I then took a sharp object which was on his bed stand and slit his wrists. As he was bleeding out, I heard someone coming. I managed to hide myself. The moment he arrived in the room I pushed him down and closed the door behind him and ran from the house before it was noticed.

A guilty consciousness is why I come here to confess. I have a wife and child whose lives would be adversely affected if I went to jail. I also had no idea that Mr. Vivek would also be in that room that night. I feel terrible for being involved in the murder of a person and I have come here to confess.





#### ANNEXURE NO. 29

#### LETTER REGARDING THE DISCIPLINARY ACTION

## STATE OF ZOOTOPIA DEPARTMENT OF POLICE

Director GeneralofPolice Date: 05.10.2020

State of Zootopia Pincode-144 036

To

BhaleRao Singham ACP Chungam P.S. Srivijaypura City

#### **Subject: Initiation of Disciplinary Proceedings**

In furtherance of the irresponsible handling of evidence in the course of investigation conducted by you, the Director General of Police, Zootopia is directed to institute the disciplinary proceedings to determine the actions through enquiry. Therefore, you are here by removed from all the investigating duties and are asked to hand over those files to Mr. Vineeth Singhal, ACP, Srivijaypura City, for further action. You are required to be present in the proceedings on 28.10.2020 at 10 A.M. in the office of the Director General. Failure to attend the proceedings shall lead to serious consequences.

Sd/-

Zootopia DGP, State of Zootopia





# ANNEXURE NO. 30 WITNESS STATEMENTS RECORDED U/S 161 CR.P.C. DEFENCE WITNESS STATEMENT OF MR. SANTA

Myself, Mr. Santa. I am an electrician working for Chettiar Chemicals. I have a diploma and I have worked in this field for 25 years. On 16<sup>th</sup> our manager sent us to Chandramukhi Ma'am's house as there was some problem with the A.C in her house. I immediately went to the house and along with me Banta came along. We reached the house at around 3.30 pm and we went to the terrace to work on the A.C units.

When we reached on the terrace, it was pretty humid and I think there were 4 A.C units. Chandramukhi ma'am had told us to specifically work only on one unit. When we reached the terrace, she pointed to us as to which unit to work on. In order to examine the A.C unit we removed the main cover of the Unit and as to know what the problem was and we discovered that there was a problem with the Motor of the A.C. We informed Chandramukhi ma'am that we required some spare parts to fix the motor and we will also require a bypass inlet pipe. Then Mr. Banta and I went to the electric shop to buy the spare parts and the inlet pipe. On returning we quickly began to work and we finished fixing the motor in 45 minutes. While working on the A.C. unit, Chandramukhi ma'am came to the terrace and asked us few questions regarding the piping of the unit. Then we informed Chandramukhi ma'am that the work was done and the motor was working. Before we left, we fit the main cover of the A.C back. After this Banta and I immediately left the house.

We do not have any reason to believe that the unit had been tampered with before our arrival as we did not come across anything suspicious during our examination and the motor was worn out. We also did not tamper with anything and only replaced the motor of the AC unit and answered the questions of Chandramukhi ma'am.

(Signed)





## ANNEXURE NO. 31 WITNESS STATEMENT OF MR. BANTA

I am Banta, a junior intern at Chettiar Chemicals. I have a degree in engineering. For the last four months I have been interning at Chettiar Chemicals. On 16<sup>th</sup> my manager, sent me to Chandramukhi Ma'am's house in order to repair her AC as there was some problem. Mr. Santa and I were sent to Ma'am's house to repair the A.C. We reached the house around 3:30 pm. On reaching the house, we were taken to the terrace and we began to examine the unit. Chandramukhi Ma'am had already told us that there was a problem only in one A.C. On examining we discovered that the motor of the AC unit was not working, so we informed Chandramukhi Ma'am about this. Then Santa and I went to the electric store to buy the spare parts and also an inlet pipe. On returning we fixed the motor of the A.C and while doing this Chandramukhi Ma'am came to the terrace and she asked us few questions. Then we finished fixing the motor and informed her about the same. After this, Santa and I immediately left the house.

(Signed)





## ANNEXURE NO. 32 SPOT MAP OF THE HOUSE

