SOCIAL WORKER

To,

Date: 21/08/2025

Shri Rameshwar Meena (IRS), Additional Joint Director, Income Tax (Investigation), Government of India

Subject: Submission of Comprehensive Complaint under Benami Transactions
Informants Reward Scheme, 2018 & Income Tax Informants Reward Scheme, 2018
against Shri Sameer Kishorkumar Pandya, Presently Assistant Engineer, DNH & DD
Power Corporation Limited – Request for Immediate Raids, Investigation and
Attachment of Disproportionate Assets.

Respected Sir,

I write to you under the aegis of the Benami Transactions Informants Reward Scheme, 2018, and the Income Tax Informants Reward Scheme, 2018, to submit this detailed and evidence-based complaint against Shri Sameer Kishorkumar Pandya, currently working as Assistant Engineer in the DNH & DD Power Corporation Limited (Daman & Diu). This complaint reveals severe violations of the Benami Transactions (Prohibition) Act, the Income Tax Act, the Prevention of Corruption Act, and multiple provisions of the Indian Penal Code. The complaint is supported with verifiable facts, documents, land transactions, and other critical financial indicators suggesting the accumulation of assets worth tens of crores — completely disproportionate to the known and declared sources of income of Shri Pandya and his family members.

This letter and its annexures urge your department to immediately initiate search and seizure operations, forensic financial investigations, and other legal processes necessary to unearth the full extent of this well-organized corruption nexus, which is not just limited to the officer himself, but extends to his wife, family members, and business partners.

I. DETAILS OF THE OFFICER UNDER COMPLAINT

Name: Shri Sameer Kishorkumar Pandya

Designation: Presently Assistant Engineer, DNH & DD Power Corporation Ltd.

Date of Joining Government Service: 13-11-1997

Date of Birth: 08-05-1972 PAN Number: ACDPP2277M Aadhaar Number: 2031 3916 0815

Spouse: Smt. Sumita Sameer Pandya

PAN Number: ANIPP3791L
 Aadhaar Number: 3380 3287 6158

Children: Varun Pandya (Son), Ishani Pandya (Daughter)

कार्यालय अपर/संयुक्त आ**बकर** हिदेशक (अन्वेषण) वाणी

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The accused in this case is: Sameer Kishorkumar Pandya, presently serving as Assistant Engineer in DNH & DD Power Corporation Limited, who was initially appointed as Junior Engineer in the Electricity Department of Daman & Diu on 13-11-1997. His date of birth is 08-05-1972, PAN Number ACDPP2277M, Aadhaar Number 2031 3916 0815. The proof of his present posting and charge is enclosed as Annexure-1-A, 1-B, 1-C.

His family details are as follows: - Father's Name: Kishor Kumar Lalji Pandya - Wife's Name: Smt. Sumita Sameer Pandya (PAN: ANIPP3791L, Aadhaar: 3380 3287 6158) - Son's Name: Varun Sameer Pandya - Daughter's Name: Ishani Sameer Pandya

This family, headed by a government servant, now owns properties worth several crores, has dozens of plots, multiple lands, and shares in various companies. Full details of Disproportionate Asset Evidence and Land Transactions are annexed in Annexure-2-A, 2-B, 2-C, and Annexure-6-A (345 Pages) respectively. Additionally Annexure-3-A contains details of Company, Partnerships, relatives and associates connected with this corrupt nexus.

II. DETAILED PROPERTY PORTFOLIO (ANNEXURE ATTACHED)

A full annexure titled "Disproportionate Asset Evidence – Land Transactions" has been submitted. In brief:

As per available records and verified documents, between 2015 and 2020, 22 plots measuring a total of 23567.19 square meters were purchased: - Registered (Sale Deed) Value: 31662786/- Market Value: 357714600/- Unaccounted Cash Component (Black Money): 326051814/- Apart from these, there are many other lands, flats, bungalows, and companies. Copies of Sale Deed Documents are enclosed as evidence in Annexure-2-A, Annexure-2-B, and Annexure-2-C.

It is also important to note that this assessment does not account for other significant assets such as companies' plant and machinery, inventory/stocks, funds deposited in various bank accounts, fixed deposits, demat accounts holding shares, gold, silver, valuables stored in bank lockers, and other movable assets.

The true value of these assets, which may run into several crores of rupees, can only be ascertained through a thorough search and seizure operation (raid) by the competent authorities.

III. SUSPICIOUS COMPANIES AND PARTNERSHIPS

Smt. Sumita Sameer Pandya is listed as a business partner in two companies:

1. RKPET PROFILES

- Address: Sr. No. 184/1, Plot No. 39, Panchal Udhyog Nagar, Bhimpore, Nani, DNH & DD – 396210
- Partners: Mr. Ketan Pandya and Smt. Sumita Pandya

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2. MAX EXTRUSIONS PRIVATE LIMITED

- Address: Survey No. 688/13 A, Siddhivinayak Industrial Estate, Somnath, Daman, DNH & DD – 396210
- Partners: Mr. Deepak Prabhudas Mistry and Smt. Sumita Pandya

Despite being a salaried official, the assets accumulated by Shri Pandya and his wife include numerous plots of land, house partnerships, business dealings, including manufacturing concerns requiring substantial capital investment. His financial empire is clearly inconsistent with his legitimate earnings.

IV. VIOLATIONS OF LAW & SUGGESTED SECTIONS INVOKED

A detailed legal Annexure-4-A, 4-B, is attached covering relevant laws. The key applicable laws include:

- ▶ Benami Transactions (Prohibition) Act, 1988 Sections 2(9), 3, 53
- > Income Tax Act, 1961 Sections 277, 269SS, 269T, 68, 69
- Prevention of Corruption Act, 1988 (Amended) Sections 13(1)(e), 13(2), Section 7
- Bharatiya Nyaya Sanhita (formerly Indian Penal Code) Sections 61 of BNS (formerly IPC 120B), 316(2) of BNS (formerly IPC 420), 334(2) of BNS (formerly IPC 467), 335 of BNS (formerly IPC 468), 336 of BNS (formerly IPC 471), 226 of BNS (formerly IPC 177), 229 of BNS (formerly IPC 181), 253 of BNS (formerly IPC 218), 228 of BNS (formerly IPC 200)
- > CCS Conduct Rules & CCA Rules Failure to submit IPRs under Rule 18(ii)
- Prevention of Money Laundering Act, 2002 Sections 3, 4

V. ANNUAL RETURNS & MISREPRESENTATION

Shri Sameer Pandya is bound by Rule 18(ii) of the Central Civil Services (Conduct) Rules, 1964 to submit an annual return of his immovable properties. Given the scale of property found in his and his wife's name, it is:

- 1. Either he has never filed these returns (a grave violation), or,
- 2. He has filed false and misleading returns, concealing his real assets

In both cases, this amounts to major misconduct and criminal offense under CCS Rules, BNS (formerly IPC), and PCA.

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VI. JUSTIFICATION FOR IMMEDIATE RAID

Sir, we most earnestly request that this case warrants immediate search, seizure, and arrest proceedings based on the following:

- Assets worth more than Rs 35 crore have already been detected
- Suspected undeclared wealth crossing 100 crore in total
- Possibility of cash hoardings, gold, jewellery, and undisclosed benami documents
- Known tactic of such officials to maintain benami lockers, accounts, and land in hometowns or family names
- History of gold/silver recovery, benami firms, and undisclosed foreign accounts in such corruption cases
- · Flight risk and risk of evidence destruction if notice is given before raid

Possibility of Massive Seizures:

In several cases, including those cited in Annexure-5-A, and 5-B, it has been observed that during raids: - Crores of rupees in cash, - Gold, silver, diamonds, jewellery, - Property documents, - Benami accounts and shell companies,

are commonly unearthed. In this case too, sources suggest that if simultaneous multiagency raids (CBI, ED, Income Tax) are conducted at all known addresses and relatives, the total unaccounted wealth could easily exceed 100 crores.

VII. REQUESTED ACTIONS

- 1. Immediate approval of Search and Seizure under Section 132 of the Income Tax Act
- Benami property attachment proceedings under Prohibition of Benami Transactions Act
- 3. Investigation into business partners and related companies
- 4. Cross-verification of all ITRs, PANs, and GSTs of officer, spouse, and associates
- Blocking of VRS application if submitted by the officer
- 6. Initiation of prosecution under Income Tax Act, PCA, and IPC

VIII. FINAL REMARKS

This case is a glaring example of how deep-rooted corruption can undermine public trust in government institutions. If not acted upon swiftly, it sets a dangerous precedent for others to engage in similar conduct. All supporting documents, sale deeds, PAN details, Aadhaar cards, and proof of property ownership and partnerships are enclosed with the annexures. Your office is fully empowered to act, and with this comprehensive set of documents, we believe no further delay is justified.

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We sincerely urge your good office to act upon this comprehensive complaint without delay, in the larger public interest and for the preservation of institutional integrity.

We affirm that this complaint is submitted in good faith and for public interest. All information provided here is available through legal and public means, and we hereby declare that it may be used for further investigation, inquiry, or legal prosecution.

Yours faithfully,

Chintu Mangilal Jain

Date: 21/08/2025

Enclosures:

- Annexure 1-A, 1-B, 1-C, Present Posting and Charge
- Annexure 2-A, 2-B, 2-C, Disproportionate Asset Evidence and Land Transactions
- Annexure 3-A, Company Partnerships Other relatives and associates
- Annexure <u>4-A, 4-B, Comprehensive</u> Legal Provisions Invoked
- Annexure 5-A, 5-B, Landmark Convictions in Similar DA Cases
- Annexure 6-A, 18 Registered Documents like Purchase and Sale deed, Power of Attorney and rent agreement are attached Total 345 Pages.

Copy to:

To,

Shri Sunil Kumar Singh, DGIT (Inv.),

Directorate General Of Income-Tax (Inv.) Gujarat.

Aayakar Bhawan, Ashram Road, Near Income Tax Circle,

Shreyas Colony, Navrangpura, Ahmedabad, Gujarat Pin - 380009

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Disproportionate Assets Evidence – Land Transactions

Introduction: This annexure provides a comprehensive and structured presentation of land transactions involving Smt. Sumita Samir Pandya, wife of Shri Samir Pandya, a serving public official. These transactions, evaluated for their market versus official sale deed values, expose a clear case of possession of disproportionate assets, suspected benami acquisitions, and possible black money transactions in violation of multiple statutory and regulatory provisions. Each entry below outlines key transaction details, property area, official value, market value, estimated unaccounted cash component (black money), and relevant comments. This annexure forms the core of evidence supporting the complaint filed for initiating criminal proceedings and departmental inquiry.

Summary Table of Property Transactions and Disproportionate Valuation

Year	Document No	Reg. Date	Survey No	Seller	Buyer	Total Area (Sq. Mt)	Sale Deed Value (INR)	Market Value (INR)	Black Money (INR)
2015	1430	03-07-2015	568/10, 568/11, 568/12, 568/13	Shir Ashokkumar Bagla	Smt. Sumita Samir Pandya	1634.75	2750000	24521250	21771250
2016	421	22-02-2016	568/8, 568/9, 568/14, 568/15	Shri Esmail Ebrahim Dhariwal	Smt. Sumita Samir Pandya	1254.37	2100000	18815550	16715550
2018	2902	27-12-2018	568/30, 568/31, 568/40, 568/41	Shri Anil Jayramdas Agarwal	Smt. Sumita Samir Pandya	1350	2550000	20250000	17700000
2018	2505	24-10-2018	568/7, 568/16	Shri Ashokkumar Bagla	Smt. Sumita Samir Pandya	635.63	1199850	9534450	8334600
2019	1075	04-06-2019	506/1	Smt. Bhavika Kaushal Vyas	Smt. Sumita Samir Pandya	113.85	N/A	N/A	N/A
2019	1340	15-07-2019	506/1	Smt. Sumita Samir Pandya as a POAH of Smt. Bhavika Kaushal Vyas	Mrs. Dipti Arquisan,Mr. Brijesh Bishwanath Prajapati	113.85	1600000	3162500	1562500

2019	1151	19-06-2019	506/1	Smt. Sumita Samir Pandya, as POAH of Smt. Bhavika Kaushal Vyas	Mrs. Dipti Arquisan ,Mr. Brijesh Bishwanath Prajapati	113.85	1600000	3162500	1562500
2020	2206	21-12-2020	568/33, 568/36	Shri. Imitiyaz Abubakar Kureshi as a POAH of Shri. Esmailbhai Ebrahim Dhariwala	Smt. Sumita Samir Pandya	826.39	1571091	12395850	10824759
2020	1401	15-09-2020	568/32, 568/34, 568/35	Shri. Imtiyaz Abubakar Kureshi as a POAH of Shri. Esmalibhai Ebrahim Dhariwala	Smt. Sumita Samir Pandya	1080	2042595	16200000	14157405
2020	1835	30-10-2020	568/37, 568/38, 568/39	Imtiyaz Abubakar Kureshi, as POAH of Esmailbhai Ebrahim Dhariwala	Imtiyaz Abubakar Kureshi, as POAH of Esmailbhai Ebrahim Smt. Sumita Samir Pandya 1012.5 192375		1923750	15187500	13263750
2021	979	12-04-2021	170/5	Shri. Imtiyaz Abubakar Kureshi, as POAH of Shri. Satyanarayan Gopilal Kabra	Smt. Sumita Samir Pandya	5735	7025500	86025000	78999500
2021	1428	22-06-2021	257/2	N/A	Mrs. Sumita Samir Pandya,In Favour of Punjab National Bank	312.5	N/A	9375000	N/A
2021	1110	11-05-2021	257/2	Mrs. Sumita Samir Pandya,Mr. Samir Kishor Pandya	In Favour of Punjab National Bank	312.5	N/A	N/A	N/A
2022	2226	05-11-2022	184/1(39	Shri Parag Pravinchandra Juthani as a proprietary Concern of GIRIRAJ PLASTIC INDUSTRIES (The Lessor)	Smt Sumita Samir Pandya as a represented through its partner of R K PET PROFILES (The Lessee)	750	N/A	18750000	N/A
2022	1930	15-09-2022	184/1 (39	Shri Parag Pravinchandra Juthani as a proprietary Concern of GIRIRAJ PLASTIC INDUSTRIES (The Lessor)	Smt Sumita Samir Pandya as a represented through its partner of R K PET PROFILES (The Lessee)	750	N/A	N/A	N/A
2022	2227	05-11-2022	184/1(39	Shri Parag Pravinchandra Juthani as a proprietary Concern of GIRIRAJ PLASTIC INDUSTRIES (The Lessor)	Smt Sumita Samir Pandya as a represented through its partner of R K PET PROFILES (The Lessee)	750	N/A	N/A	N/A
2022	2228	05-11-2022	184/1(39	Shri Parag Pravinchandra Juthani as a proprietary Concern of GIRIRAJ PLASTIC INDUSTRIES (The Lessor)	Smt Sumita Samir Pandya as a represented through its partner of R K PET PROFILES (The Lessee)	750	N/A	N/A	N/A

2023	97	13-01-2023	170/5	SMT. SUMITA SAMIR PANDYA	ANILKUMAR BABULAL MALVIYA	5735	7300000	86025000	78725000
N/A	N/A	N/A	Survey No.688/13		MAX EXTRUSIONS PRIVATE LIMITED	427	N/A	12810000	N/A
N/A	N/A	C 201, SAMARTH PARK SNEH PARK VAPI			MAX EXTRUSIONS PRIVATE LIMITED	N/A	N/A	15000000	N/A
N/A	N/A	501 Sky Crest Greenville, Ajit Nagar, Chala, Vapi			MAX EXTRUSIONS PRIVATE LIMITED	N/A	N/A	6500000	N/A

23657.19	31662786	357714600	263616814
	0.002.00		

Ca	Calculated Totals (As Per Records Provided)					
•	Total Official Sale Deed Value (INR):	31662786				
•	Total Land Area (Sq. Mts.):	23657.19				
•	Total Market Value (INR):	357714600				
•	Estimated Black Money Component (Difference):	326051814				

Legal Inference & Evidentiary Weight

- **Disproportionate Asset Angle:** The assets acquired far exceed known or probable legal income of the public servant.
- Benami Element: Most lands are in wife's name, some in company name; transactions routed via POA with repeated sellers.
- Cash Transactions: Gap between official deed and market value strongly suggests black money usage.

Concealment & Non-declaration: Raises violations under Prevention of Corruption Act, BNS (formerly IPC, Income Tax Act, Benami Act, and CCS Rules.

Closing Observations:

This annexure establishes an unmistakable pattern of large-scale land acquisition using undeclared or black income. The undervaluation of sale deed amounts, circular resale of the same plots, and the role of close family members and shell entities in purchases indicates benami holdings, criminal conspiracy, and fraudulent disclosures. These records are legally admissible under the Evidence Act, and form a robust foundation for invoking all relevant criminal, anti-corruption, and tax evasion provisions. All sale deeds, registration documents, and supporting property records are appended to this complaint.

Note:

Apart from the companies and properties identified and enclosed in this complaint, it is highly probable that there exist several more undisclosed firms, benami plots, flats, and commercial establishments within the Union Territory of Dadra and Nagar Haveli and Daman and Diu and other state.

Details of Company, Partnerships, relatives and associates connected with this corrupt nexus.

Sr. No.	Name	Relations	Company Name	Company Name	PAN	Aadhar
01	Samir Pandya	Name	R K Fireworks		ACDPP2277M	2031 3916 0815
02	Kishor Kumar Lalji Pandya	Father				
03	Sumita Samir Pandya	Wife	R K PET PROFILES	MAX EXTRUSIONS PRIVATE LIMITED	ANIPP3791L	3380 3287 6158
04	Varun Samir Pandya	Son				
05	Ishani Pandya	Daughter				
06	Prashant Joshi	Wife's Brother				
07	Kaushal Vinod Vyas	Wife's Brother				
08	Bhavika Kaushal Vyas	Wife's Brother's Wife			AQCPV4704E	5584 4142 4014
09	Jasvantlal Joshi	Associate			AJLPJ9513F	5727 2698 6793
10	Ketan Pandya	Partner	R K PET PROFILES			7942 2127 0806
11	Ketanbhai Arvindbhai Pandya	Partner	Kenny Inc			7942 2127 0806
12	Punita Ketanbhai Pandya	Associate				8748 5970 4005
13	DEEPAK PRABHUDAS MISTRY	Partner	MAX EXTRUSIONS PRIVATE LIMITED			
14	Nilesh Mistry	Partner	MAX EXTRUSIONS PRIVATE LIMITED			
15	PARAG PRAVINCHANDRA JUTHANI	Landlord	GIRIRAJ PLASTIC INDUSTRIES	SHREE GIRIRAJ INDUSTRIES		
16	Kamal Juthani	Landlord	Giriraj Plastic			
17	ARUN VYAS	Associate	SIDDHI FLEXI PACK PRIVATE LIMITED			
18	KIRAN VYAS	Associate	SIDDHI FLEXI PACK PRIVATE LIMITED			
19	Khusman Ranchhod Dhimar					9028 2291 0256
20	Ashokkumar Bagla	Land dealing	Many Companies			
21	Esmail Ebrahim Dhariwal	Land dealing	Many Companies		AABPD9384K	6565 8152 8553
22	Anil Jayramdas Agarwal	Land dealing	Many Companies			
23	Imtiyaz Abubakar Kureshi	Land dealing	Many Companies		ADGPK2143R	2754 2593 8043
24	Satyanarayan Gopilal Kabra	Land dealing	Many Companies			
25	Dipti Arquisan	Land dealing	Many Companies			
26	Brijesh Bishwanath Prajapati	Land dealing	Many Companies			
27	ANILKUMAR BABULAL MALVIYA	Land dealing	Many Companies		ABVPM9683K	7713 1746 4434

Note: Apart from the companies and partners identified and involved in this complaint, it is highly likely that there may be many more companies and partners in the Union Territories of Dadra and Nagar Haveli and Daman and Diu and other states.