

Accused Copy

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**IN THE HONOURABLE COURT OF JUDICIAL MAGISTRATE OF FIRST
CLASS AT PALASA**

Honoured Madam,

Sub: Police – Kasibugga PS – Arrest of accused in a case of culpable homicide not amounting to murder, coupled with criminal conspiracy, abetment, screening of evidence, giving false information respecting an offence committed, impersonation, and harboring an offender- Pending investigation – Request to grant judicial remand for a period of 15 days – Reg.

Ref: Cr.No.239/2026 U/s 105 R/w 61(2) of BNS & 231, 238, 240, 242, 249 R/w 49 BNS of Kasibugga PS

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Accused:

A-3) Sri Seediri Appala Raju S/o Late Neelayya, aged about 46 years, residing at GME Colony, Ingiligam, Palasa-Kasibugga Municipality, N/o Devunalthada village of Vajrapukotturu Mandal. Aadhar No.273604688705.

While forwarding the marginally noted accused to the Hon'ble Court under proper escort, I submit the following case facts to the Hon'ble court.

In continuous remand report of the accused A-1 & A-2 dated: 13.07.2026, it is respectfully submitted that this is a case of culpable homicide not amounting to murder, coupled with criminal conspiracy, abetment to commit culpable homicide, screening of evidence, giving false information respecting an offence committed, impersonation and harboring an offender, that occurred on 10.07.2026 at about 21:30 hours on the Old NH-5 Road, near Industrial Area Junction, Palasa-Kasibugga Municipality. The incident was initially reported as a fatal road accident on 11.07.2026 at 08:30 hours and upon the collection of evidence during the course of investigation, on 13.07.2026, the case was altered as culpable homicide. Therein A-1 Seediri Arav Varma @ Arav S/o Appalaraju rode a high-powered motor cycle bearing

No.AP-40-AF-9994 in a rash and negligent manner without having valid license in contrary to Central Motor Vehicles Rules -1989 and with the knowledge that his acts may likely to cause death of a person and dashed against the deceased Dubba Danayya S/o Kareyya and caused his instantaneous death. Later, A-3 Seediri Appalaraju hatched a plan to shield A-1 from criminal liability. Accordingly A-1, A-2 Siddarth Tyadi S/o Surendra Narayana Tyadi & A-3 conspired themselves and in furtherance of their conspiracy, A-3 instructed A-2 to falsely represent himself as the rider of the offending motor cycle and further instructed A-2 to remove the motor cycle from the scene.

During the course of investigation, the then investigation officer/Inspector of Police, Kasibugga PS collected the technical evidence by proceeding to various places where the accused A-3 visited after the offence. In that process the IO visited KV Gopal and son's filling station, Kasibugga. Then he verified the CC footage at the KV Gopal filling station in the presence of the mediators and found that the accused Sri. Seediri Arav visited the filling station at 21:07 hours on 10.07.2026 on Royal Enfield Motor Cycle bearing registration No.AP-40-AF-9994 and filled petrol by making payment of Rs.100/- and also found that the accused A-1 was passes on the same crime vehicle at 21:30 hours towards GME colony, Palasa-Kasibugga municipality. Then IO seized the CCTV with the help of technician Sarti Sai Manikanta in a pen-drive in the presence of the mediators under the cover of the seizure report at 11:15 hours on 14.07.2026.

Then IO secured the presence of the owner of the KV Gopal & sons and technician, examined them as LWS-11 & 12 U/s 180(3) BNSS and recorded their detailed statements in Part-II case diary.

Then IO along with the mediators, technician and staff started from KV Gopal filling station and reached Bajaj show room near GME colony, Palasa-

Kasibugga municipality. Where IO verified the CC footage at Bajaj show room and found that a white colored Skoda car of the accused A-3 Sri Seediri Appalaraju was proceeding from GME to Kasibugga side on 10.07.2026 at 21:43 hours. Then IO seized the CCTV footage with the help of technician Bhanu Murthy Talasu in a pen-drive in the presence of the mediators under the cover of the seizure report at 11:50 hours on 14.07.2026.

Then IO secured the presence of the Supervisor of Baja Show room, examined him as LW-13 and recorded his statement U/s 180(3) BNSS in Part-II case diary.

Then IO along with the mediators, technician and staff started from Bajaj show room near GME colony, Palasa-Kasibugga municipality and reached Dr. Balakrishna hospital, Chinnabadam village of Palasa Mandal. Where IO verified the CC footage at Sai Srinivasa multi specialty hospital, Chinnabadam and found that at about 22:03 hours on 10.07.2026, the accused A-3 Sri Sidiri Appalaraju took his son/A-1 Sri Sidiri Arav Varma, who had sustained injuries while committing the offence, to the hospital in his white colored Skoda car bearing Registration No.AP39 RP 3591. After the injured was treated by the medical officer i.e. Dr. T. Balakrishna, it was further noticed through the CCTV footage that at about 22:52 hours on the same night, they left the hospital in the same car and proceeded towards Chinnabadam side. The said incidents were clearly captured in the CCTV footage available in the hospital. Then IO seized the CCTV with the help of technician Bhanu Murthy Talasu in a pen-drive in the presence of the mediators under the cover of the seizure report at 12:30 hours on 14.07.2026 which is crystal clear evident that the accused A-3 well known about the offence committed by A-1 and knowing fully in furtherance of their conspiracy, screen the accused from the criminal liability.

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Then IO secured the presence of the managing director of the hospital, examined him as LW-14 U/s 180(3) BNSS and recorded his detailed statement in Part-II case diary.

Then IO verified the outpatient register at Sai Srinivasa multispecialty hospital, Kasibugga in the presence of the mediators and found that the accused A-1 Seediri Arav Varma was taken OP on 10.07.2026 and the name was entered in the register in serial No.65 as the accused A-1 was brought by the accused A-3/father of the accused A-1. Then IO seized the outpatient register in the presence of the mediators under the cover of the seizure report at 13:00 hours.

Then IO secured the presence of the medical officer, Sai Srinivasa multispecialty hospital, Kasibugga, examined him as LW-15 U/s 180(3) BNSS and recorded his detailed statement in Part-II case diary.

Then IO along with the mediators, technician and staff started from Balakrishna hospital, Chinnabadam and reached toll plaza, Laxmipuram village of Palasa Mandal. Where IO verified the CC footage at Toll Plaza, Laxmipuram village of Palasa Mandal and found that the white colored Skoda car bearing Registration No.AP39 RP 3591, belonging to Sri Sidiri Appalaraju, was found proceeding on the following occasions that 1) on 10.07.2026 at about 23:00 hours, the said vehicle passed the toll plaza from Tekkali side to Ichapuram side, 2) on 11.07.2026 at about 01:00 hours, the same vehicle passed the toll plaza from Ichapuram to Visakhapatnam route and again 3) on 12.07.2026 at about 12:10 hours, the said vehicle passed toll plaza from Visakhapatnam side to Ichapuram side. Then IO seized the CCTV with the help of technician Bhanu Murthy Talasu in a pen-drive in the presence of the mediators under the cover of the seizure report at 13:30 hours.

Then IO secured the presence of the validator, examined him as LW-16 U/s 180(3) BNSS and recorded his detailed statement in Part-II case diary.

Then IO examined the technician as LW-17 U/s 180(3) BNSS and got recorded his detailed statement in my Part-II case diary. Then IO secured the presence of the following witnesses, examined them as LWs-18 to 21 U/s 180(3) BNSS and recorded their detailed statements in Part-II case diary.

Subsequently, I took up for further investigation in this case on the instructions of the kind SDPO-Kasibugga vide C.No.26/SDO-K/Crime/2026, dated: 19.07.2026.

The investigation has revealed that the accused A-1, Seediri Arav Varma @ Arav is a resident of GME Colony, Palasa-Kasibugga Municipality. He recently applied for a driving licence on 06.07.2026, pursuant to which the Motor Vehicle Inspector, Palasa, issued him only a Learner's Licence (LLR) on 08.07.2026, authorizing him merely to learn to drive subject to statutory conditions. The accused A-2, Siddarth Tyadi is a resident of Tyadi Quarters, Tilak Nagar, Palasa-Kasibugga Municipality. The accused A-3 is the father of A-1 and a resident of GME Colony, Palasa-Kasibugga Municipality. He is a political leader who previously served as a Minister in the Government of Andhra Pradesh. A-2 and his family members are close associates of A-3 and frequently visited the residence of A-3.

The investigation further revealed that on 10.07.2026, at about 8:30 PM, A-2 visited the house of A-3 on his Royal Enfield Motorcycle bearing Registration No.AP-40-AF-9994. At that time, A-1 requested A-2 to hand over the motorcycle, stating that he had some work at Kasibugga. At the instance and in the presence of A-3, A-2 knowingly entrusted the motorcycle to A-1 despite being fully aware that A-1 possessed only a Learner's Licence, had obtained the same merely two days earlier, and lacked sufficient skill and experience to ride such a powerful motorcycle on a public road. A-3 knowingly allowed A-1 to ride a High powered motor cycle despite being fully aware that A-1 possessed only a Learner's Licence, had obtained the same nearly two

days earlier, and lacked sufficient skill and experience to ride such a power full motor cycle on public road and knowledge that riding such high powered motor cycle without having valid licence his likely by such act to cause death of a person. At about 09:00 PM, A-1 left GME Colony on the said motorcycle. At about 9:06 PM, he purchased petrol at LW-11's Petrol Bunk at Kasibugga. Thereafter, at 9:34 PM, A-1 telephoned A-2 and informed him that while riding the motorcycle near the Industrial Area, he had hit the deceased Dubba Danayya, who died on the spot and that he himself had sustained simple injuries. Immediately A-2, A-3 and the Personal Assistant of A-3 i.e. Krishna, proceeded to the scene of offence in the car of A-3. Upon reaching the spot, they found the deceased lying on the road with grievous bleeding injuries. Instead of informing the police or extending lawful assistance, A-3 hatched a plan to shield A-1 from criminal liability. Initially, A-3 abetted A-2 to falsely implicate his supervisor namely Srinu as if he committed the offence. A-3 further instructed A-2 to remove the offending motorcycle from the scene of offence so as to obliterate and tamper with material evidence. Before leaving the scene, A-3 handed over the damaged mobile phone of A-1 to A-2 and took A-1 away from the place of occurrence in his Skoda car. Later, A-3 abetted A-2 to falsely represent himself as the rider of the offending motorcycle in the event of any enquiry by the public or the police to screen the accused A-1 who is his son. Thereafter, A-3 shifted A-1 to Sai Srinivasa Multi Specialty Hospital, Chinnabadam Village, where A-1 received treatment at the hands of LW-15. A-3 gave false information to the SI-Kasibugga PS and CI-Kasibugga PS with respect to offence that the offence was committed by someone instead of his son/A-1 with an intention to screen the accused. Thereafter, A-3 along with A-1, returned to his residence via toll plaza, Laxmipuram village of Palasa Mandal.

Meanwhile, while A-2 was attempting to remove the motorcycle from the scene of offence, LWs.3 to 7 intercepted him. Initially, A-2 falsely claimed

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before them that he himself had caused the accident. He continued to falsely portray himself as the rider of the offending vehicle until he was apprehended by the said witnesses and handed over to the police. Even during the initial police enquiry, A-2 deliberately made a false statement admitting himself to be the rider of the motorcycle, with the sole intention of screening A-1 from legal punishment and causing disappearance of material evidence.

Meanwhile, on the instructions of A-3, some of his henchmen approached the wife of the deceased, entered into an understanding with her, and allegedly agreed to pay an amount of Rs.8,50,000/- and paid an amount of Rs.1,50,000/- in an attempt to secure her support for the false version and thereby facilitate the concealment of the true facts relating to the offence.

The investigation has further revealed that A-1, despite possessing only a Learner's License obtained just two days before the incident, rode the motorcycle in a rash, reckless, and dangerous manner without exercising due care or maintaining proper control over the vehicle, thereby endangering human life. The force and manner of impact resulting in the instantaneous death of the deceased prima facie discloses the commission of the offence punishable under Section 105 of BNS, 2023. A-1, Seediri Arav Varma @ Arav S/o Appalaraju despite possessing only a Learner's License obtained just two days before the incident, rode a high-powered motor cycle bearing No. AP-40-AF-9994, without having a valid licence, contrary to Central Motor Vehicles Rules -1989, in a rash, reckless, and dangerous manner without exercising due care or maintaining proper control over the vehicle with the knowledge that his acts were likely to cause the death of a person and dashed against the deceased Dubba Danayya S/o Kareyya and caused his instantaneous death. Later A-3 Seediri Appalaraju hatched a plan to shield his son A-1 from criminal liability. Accordingly A-1, A-2 Siddarth Tyadi S/o Surendra Narayana Tyadi & A-3 conspired themselves and in furtherance of their conspiracy, A-3

abettted A-2 to falsely represent himself as the rider of the offending motor cycle and further instructed A-2 to remove the motor cycle from the scene.

Thus, the act of accused A-3 in falsely implicating A-2 instead of A-1 in the offence, knowing it to be likely that such false implication would cause an innocent person to be convicted of an offence punishable with imprisonment, there by the accused A-3 manipulated and fabricated the evidence with intent to procure conviction to a innocent person, which attracts the offence punishable under Section 231 of the BNS.

The acts of the accused A-3 that A-3 knowingly allowed A-1 to ride a high-powered motor cycle like Royal Enfield Hunter despite being fully aware that A-1 possessed only a Learner's Licence, had obtained the same merely two days earlier, and lacked sufficient skill and experience to ride such a powerful motorcycle on a public road. The accused A-3 also have knowledge that riding such high powered motor cycle without having valid licence is likely by such act to cause death of a person and thereby abettted the accused A-1 to commit culpable homicide, which attracts the offence punishable under section 105 R/w 49 BNS.

The act accused A-3 that he conspired with accused A-1 and A-2 and attempted to falsely implicate A-2 in the offence in order to screen A-1 from criminal liability, thereby attracting the offence punishable under Section 61(2) of the Bharatiya Nyaya Sanhita, 2023 (BNS).

The acts of accused A-3 in instructing A-2 to remove the motorcycle from the scene of the offence and abetting A-2 to falsely represent himself as the rider of the offending motorcycle, with the intention of screening accused A-1 from legal punishment, attract the offences punishable under Sections 238 and 242 of the BNS.

The act of accused A-3 in informing the Sub-Inspector of Police and the Inspector of Police, Kasibugga Police Station, that the offence had been committed by his supervisor, namely Srinu, attracts the offence punishable under Section 240 of the BNS.

Further, the acts of accused A-3 in abetting A-1 to ride a high-powered motorcycle without a valid driving license and in harbouring A-1 with the intention of screening him from legal punishment attract the offences punishable under Sections 49 and 249 of the BNS.

Thus, a prima facie case is made out against accused A-3 for the offences punishable under Sections 231, 61(2), 238, 240, 242, 249, and 49 of the Bharatiya Nyaya Sanhita, 2023, apart from his liability for the principal offence committed by accused A-1 pursuant to the criminal conspiracy.

Further investigation is in progress to collect additional evidence regarding the conspiracy, the destruction and suppression of evidence, electronic evidence, financial transactions relating to the offer of compensation, and the involvement of other persons.

While the investigation is in progress, on 22.07.2026 at 18:40 hours, I apprehended the accused A-3 and brought him to Kasibugga PS and after enquiry I arrested the accused A-3 at Kasibugga PS on 22.07.2026 at 20:30 hours after informing the reasons of his arrest, legal rights and nature of offence and recorded his confessional report in the presence of the mediators from 00:10 hours to 01:30 hours on 23.07.2026. The accused A-3 confessed to have committed the offence, but he denied to sign on the mediators report in the presence of the mediators.

Arrested accused was placed in the lockup at 21:00 hours under surveillance and after due search and making necessary entries in the PS records. Arrest particulars of accused A-3 has informed to his brother Sri

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Seediri Thrinadh at his request. The accused has not complained any ill treatment at the hands of Police while in Police custody. The directions of Honourable Supreme Court of India have been observed strictly before and after the arrest of accused under the provisions of section 47 & 48 BNSS. The accused A-3 was subjected for medical examination at Govt Hospital, Palasa and obtained his health condition certificate.

Then I verified the antecedents of the accused A-3 with the available records of Kasibugga PS and found that the accused A-3 involved in the following cases at Kasibugga PS.

- 1) Cr.No.33/2018 U/s. 143, 283, 341 r/w 149 IPC
- 2) Cr.No.263/2024 U/s 153 IPC
- 3) Cr.No.486/2024 U/s 352, 353(D)(b), 351(2), 353(2) BNS
- 4) Cr.No.576/2024 U/s 126(2), 189(3), 223 r/w 190 BNS
- 5) Cr.No.52/2025 U/s 126(2), 329(3), 351(2)(3) r/w 49 BNS
- 6) Cr.No.104/2025 U/s 126(2), 189(3), 223 r/w 190 BNS
- 7) Cr.No.229/2025 U/s 126(2), 189(3) r/w 190 BNS
- 8) Cr.No.322/2025 U/s 126(2), 189(3), 223 r/w 190 BNS
- 9) Cr.No.326/2025 U/s 109(1), 132, 74, 79 r/w 3(5) BNS
- 10) Cr.No.327/2025 U/s 132, 127(2), 223, 352, 351(2) r/w 190 BNS
- 11) Cr.No.354/2025 U/s 132, 126(2), 189(3), 223 r/w 190 BNS

The accused A-3 also involved in a case in Cr.No.45/2025 U/s 132, 351(2) R/w 3(5) BNS of Vajrapukotturu PS.

Grounds for remand of the accused A-3:

- The accused A-3 knowingly allowed A-1 to ride a high-powered motor cycle like Royal Enfield Hunter despite being fully aware that A-1 possessed only a Learner's Licence, had obtained the same merely two days earlier, and lacked sufficient skill and experience to ride such a powerful motorcycle on a public road. The accused A-3 also have knowledge that riding such high

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powered motor cycle without having valid licence is likely by such act to cause death of a person and thereby abetted the accused A-1 to commit culpable homicide. Thereafter, the accused A-3 initially attempted to falsely implicate A-2 in this case instead of A-1 with the intention of screening accused A-1 from criminal liability. He also instructed A-2 to remove the motorcycle from the scene of the offence. Therefore, if accused A-3 is granted bail, there is every likelihood that he may cause the evidence relating to the offence to disappear or tamper with such evidence in any manner.

- The accused A-3 induced the wife of the deceased and her family members by offering money in an attempt to secure their support for a false version and thereby facilitate the concealment of the true facts relating to the offence. Therefore, if accused A-3 is granted bail, he may make inducements, threats, or promises to persons acquainted with the facts of the case so as to dissuade them from disclosing such facts to the Court or to the investigating agency.
- The accused A-3 is a former MLA and has served as a Cabinet Minister in the State of Andhra Pradesh. He is a highly influential person in the Palasa and Kasibugga area. Therefore, if he is granted bail, he may use his influence to induce, threaten, or promise any person acquainted with the facts of the case with a view to dissuade such person from disclosing the true facts to the Court or to the investigating agency.
- The accused A-3 is a former MLA and has served as a Cabinet Minister in the State of Andhra Pradesh. Being a highly influential person in the Palasa and Kasibugga area, his release on bail is likely to impede the ongoing investigation. His release may adversely affect the fair, effective, and scientific investigation of the case. Therefore, his custodial detention is necessary to ensure that the investigation is completed fairly and without any interference.

- The investigation has established that immediately after the commission of the offence by A-1, the accused A-3, instead of informing the police or rendering lawful assistance to the deceased, deliberately hatched a criminal conspiracy to shield his son (A-1) from legal punishment. In furtherance of the said conspiracy, he instructed A-2 to falsely represent himself as the rider of the offending motorcycle, directed him to remove the offending vehicle from the scene of offence with an intention to cause disappearance of material evidence, and thereby screened the principal offender from criminal liability.
- The investigation further reveals that A-3 knowingly permitted A-1, who possessed only a Learner's Licence obtained merely two days prior to the incident and who lacked sufficient riding experience, to ride a high-powered Royal Enfield motorcycle on a public road despite having knowledge that such conduct was likely to endanger human life. By such conduct, he intentionally facilitated and abetted the commission of the principal offence.
- The CCTV footage collected from the petrol bunk, Bajaj showroom, Sai Srinivasa Multi Specialty Hospital and Toll Plaza, together with the statements of the independent witnesses, medical records, OP register, and other documentary evidence, clearly establish the movements of A-3 immediately after the offence and corroborate his active participation in harbouring A-1, shifting him to the hospital for treatment, removing him from the place of occurrence and screening him from legal punishment.
- The investigation has further disclosed that A-3 furnished false information to the police by falsely implicating another person as the offender and subsequently induced A-2 to falsely confess that he was the rider of the offending motorcycle, thereby attempting to fabricate false evidence and procure the conviction of an innocent person.

➤ The investigation has also revealed that, at the instance of A-3, certain persons approached the wife of the deceased and allegedly negotiated payment of compensation in an attempt to influence the course of investigation and suppress the true facts. The financial transactions connected with the said payment and the involvement of other persons are yet to be fully investigated.

➤ Custodial interrogation of A-3 is necessary to:

- Ascertain the complete conspiracy hatched among A-1, A-2 and A-3 before and after the commission of the offence;
- Recover and secure additional electronic evidence, including mobile phones, call detail records, digital communications and other electronic devices used in the conspiracy;
- Identify and examine all persons who assisted in screening the accused and suppressing material evidence;
- Investigate the source and mode of payment of the alleged compensation amount paid to the family of the deceased and identify all persons involved therein;
- Recover any incriminating documents, digital evidence and other material objects yet to be seized;
- Verify the role of other associates and ascertain whether any additional offences have been committed during the course of screening the offender.

➤ The accused is an influential political leader having considerable influence in the locality. If released on bail at this stage, there is every likelihood that he may influence or intimidate material witnesses, tamper with documentary and electronic evidence, destroy further evidence relating to the conspiracy, and hamper the fair course of investigation. There is also a reasonable apprehension that he may induce witnesses to resile from their earlier statements.

- > The antecedents of the accused disclose his involvement in several criminal cases registered at Kasibugga Police Station and Vajrapukotturu Police Station, demonstrating his propensity to interfere with law and order and increasing the likelihood of his obstructing the investigation if released.
- > Since the investigation is at a crucial stage and several important aspects, including the larger conspiracy, electronic evidence, financial trail, and involvement of other persons, are yet to be investigated, the custodial detention of A-3 is absolutely necessary for a fair, effective and unhindered investigation.
- > The accused (A-3), who is himself a doctor, rushed to the scene of the offence shortly after its occurrence. However, instead of providing first aid to the deceased or shifting the deceased to the nearest hospital for emergency medical treatment, he took his own son/A-1 to the hospital in his car for treatment. Had the accused (A-3) shifted the deceased to the nearest hospital without delay, the deceased might have survived.

In this case, further investigation is also required to recover and analyse digital evidence, ascertain the communications exchanged among the accused before and after the occurrence, identify all persons who actively participated in screening the offender, verify the sequence of events through scientific and electronic evidence, confront the accused with the material already collected, and recover any additional incriminating articles or electronic devices relevant to the investigation. It is also further required to unearth, the identity of the persons who approached the de facto complainant to influence her by offering an amount of Rs.8,50,000/- and forcibly compelled her to accept the said amount, in an attempt to secure her support for the false version and thereby facilitate the concealment of the true facts relating to the offence. In this case PM certificate of the deceased is pending and hence the case is in UI. Hence, proper time is required to complete the pending investigation. PT warrants to be filed before the Honourable court to connect