IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

2026:PHHC:047561

113 **CRM-M-12051-2026**
Date of decision: 25.03.2026
Date of uploading: 25.03.2026

Satnam Singh @ Satta ....Petitioner

V/s

State of Punjab ....Respondent

CORAM: HON'BLE MR. JUSTICE SUMEET GOEL

Present: Mr. Manu Loona, Advocate for the petitioner.

Mr. Hemant Aggarwal, DAG, Punjab
(Through V.C.).

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SUMEET GOEL, J. (Oral)

1. Present petition has been filed on behalf of the petitioner seeking grant of anticipatory/pre-arrest bail under Section 482 of Bharatiya Nagarik Suraksha Sanhita, 2023 (hereinafter to be referred as 'BNSS') in FIR No.17 dated 30.01.2026 registered for offences punishable under Sections 21, 29/61/85 of the NDPS Act at Police Station Koom Kalan, District Ludhiana.

2. The gravamen of the FIR in question is that the petitioner is an accused of being involved in FIR pertaining to NDPS Act involving recovery of 273 grams of heroin, 61 grams of 'Ice' (methamphetamine) alongwith Rs.60,000/- which were allegedly recovered from the co-accused of the petitioner namely Tanveer Singh @ Dhanna. The petitioner's name has come in the disclosure statement of the said co-accused, wherein he has stated that the petitioner was used to purchase the heroin from him for selling it further.

3. Learned counsel for the petitioner has iterated that the petitioner has been falsely implicated into the FIR. Learned counsel has further iterated that no recovery whatsoever has been effected from the conscious possession

of the petitioner and that he was not present at the spot at the time of the alleged recovery. The petitioner has been nominated in the disclosure statement of the co-accused. Learned counsel has emphasized that there are material contradictions and improvements in the prosecution version & nothing is to be recovered from the petitioner. Learned counsel has further submitted that the petitioner is ready and willing to join the investigation and shall fully cooperate with the investigating agency in case enlarged on pre-arrest bail. On the strength of these submissions, the grant of anticipatory bail is prayed for.

4. *Per contra*, learned State counsel while raising arguments in tandem with the reply 14.03.2026 has vehemently opposed the grant of anticipatory bail to the petitioner by submitting that the allegations against the petitioner are grave and serious in nature. Relevant paragraph of the said reply reads thus:

> *"32. That it is respectfully submitted that the role of the petitioner, evidence against the petitioner, criminal antecedents of the petitioner, status of trial as well as necessity of custodial interrogation are given below:*
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> ***(A) Role of the petitioner:***
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> *Petitioner has clearly surfaced during investigation as an active associate in the illegal drug trafficking network being operated by co-accused Taranvir Singh Dhanna. During investigation it has come on record that co-accused Taranvir Singh @ Dhanna was engaged in the sale of heroin and ICE and used different persons, bank accounts and financial transactions for receiving and transferring drug proceeds. The statement of witness Gurpreet Singh recorded during investigation further reveals that when he demanded return of the money earlier lent to co-accused Taranvir Singh @ Dhanna, an amount of Rs.5,000/- dated 19.01.2026 vide Transaction ID No. 601919151080 and -22- Rs.10,000/- dated 27.01.2026 vide Transaction ID No. 639332853838 were transferred into his Capital Finance Small Bank account from Axis Bank Account No. 921010053130524 belonging to the present petitioner. The said transactions clearly*

indicate the petitioner's financial link with co-accused Taranvir Singh @ Dhanna and show that the petitioner was facilitating monetary transactions connected with the activities of the drug network. Thus, the petitioner has emerged as a conspirator who was actively associated with the co-accused and was involved in handling financial transactions arising out of the illegal trade of narcotic substances.

(B) Evidence against the petitioner:

i) Disclosure statement of co-accused Tanveer Singh @ Dhanna: During police remand, the main accused disclosed that he used to supply heroin to the petitioner Satnam Singh @ Satta who used to purchase the heroin from him and sell it further to customers, thereby becoming part of the drug distribution chain.

ii) Recovery of commercial quantity from co-accused: A substantial quantity of contraband i.e. 273 grams heroin and 61 grams ICE along with Rs.60,000/- drug money was recovered from co-accused Tanveer Singh @ Dhanna which clearly establishes the existence of a drug trafficking network in which the petitioner was one of the active participants.

iii) Disclosure statement of co-accused Tanveer Singh @ Dhanna, specifically named the petitioner as his associate in the illegal drug trade and disclosed that the petitioner was involved in the procurement and distribution of narcotic substances.

iv) Statement of witness Saloni Sharma recorded during investigation reveals that her bank account was used for financial transactions connected with the sale of contraband and the transactions were linked with the activities of the accused persons including the petitioner.

v) Statement of witness Gurpreet Singh regarding financial transactions: The statement of Gurpreet Singh recorded during investigation reveals that when he demanded return of money earlier lent to co-accused Taranvir Singh @ Dhanna, an amount of Rs.5,000/- on 19.01.2026 (Transaction ID No. 601919151080) and Rs.10,000/- on 27.01.2026 (Transaction ID No. 639332853838) was transferred into his Capital Finance Small Bank account from Axis Bank Account No. 921010053130524 belonging to the present petitioner Satnam Singh @ Satta, thereby clearly establishing the petitioner's financial connection with co-accused Taranvir Singh @ Dhanna and his involvement in handling monetary transactions related to the activities of the drug network.

vi) Electronic and financial trail: During investigation it has further surfaced that the accused persons were using social

> *media applications such as Instagram, Snapchat and WhatsApp along with online payment platforms like Google Pay for coordinating the purchase, sale and payment of narcotic substances, and the role of the petitioner has emerged as part of the same criminal conspiracy.*
>
> *vii) The investigation has also revealed that the accused were operating through electronic communication and financial transfers for the purpose of drug trafficking, and the role of the petitioner has surfaced as part of the same criminal conspiracy.*
>
> ***(C) Criminal antecedents of the petitioner**:*
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> *Petitioner is involved in another FIR No. 117 dated 24.09.2025 under section 115(2), 194(2), 191(3), 190, 324(4), 109, 118 of BNS registered at Police Station Koom Kalan (Pending)."*

Learned State counsel has emphasized that the custodial interrogation of the petitioner is indispensable to unearth the larger nexus and further links of the syndicate indulged in the illegal trade of narcotics. Having regard to the gravity of the offence, the larger public interest in eradicating the menace of drug trafficking and the potential risk to the fair investigation and trial, it is respectfully submitted that the petitioner does not deserve the concession of anticipatory bail. Accordingly, it is prayed that the present petition be dismissed in the interest of justice.

5. I have heard the learned counsel for the rival parties and have gone through the available record of the case.

6. As per the case put forth in the FIR in question, serious allegations have undeniably been levelled in relation to the commission of offences under the NDPS Act. As per the State's reply, *prima facie* the petitioner is an active participant in an organized drug trafficking network. As per the reply filed by the State, strong evidence exists against the petitioner, including disclosure statements of the co-accused. Moreover, the petitioner is also involved in another criminal case and appears to be a habitual offender. In view of the seriousness of allegations, the nature of

evidence indicating his active complicity, and the requirement of thorough investigation, this Court does not find it to be a fit case for grant of anticipatory bail to the petitioner. At this stage, no material has been placed on record to demonstrate that the petitioner is completely unconnected with the offence and the possibility of recovery of further contraband or discovery of incriminating material cannot be ruled out.

7. The investigation conducted thus far indicates the involvement of the petitioner in a well-organized network engaged in the illegal trade and distribution of psychotropic substances. The nature and gravity of the offence, coupled with the material collected on record, justify the necessity of custodial interrogation to unravel the larger conspiracy and to identify other potential co-conspirators. The allegations in the FIR, viewed in conjunction with the available evidence, raise serious and substantiated concerns about the possible role of the petitioner in a larger narcotics network, which cannot be brushed aside at this nascent stage of the investigation. The allegations are of a grave and organized nature and the apprehension expressed by the prosecution that the petitioner, if released on bail, may abscond or attempt to influence witnesses, who may be vulnerable to coercion, does not appear to be unfounded. Having regard to the seriousness of the offence, the crucial stage of investigation, the possibility of tampering with evidence or obstructing justice and the overarching public interest in curbing the menace of drug trafficking, this Court is of the considered view that the petitioner does not merit the concession of anticipatory bail at this stage. Moreover, given the serious nature of the allegations, the custodial interrogation of the petitioner is indispensable for unearthing the broader conspiracy and identifying other potential accomplices whose identities may be within the exclusive knowledge or possession of the petitioner. The grant of anticipatory

bail at this premature stage would, therefore, seriously prejudice the ongoing investigation and may potentially result in tampering with evidence or influencing material witnesses. Furthermore, the criminal antecedents of the petitioner are a relevant consideration while assessing the likelihood of repetition of offence and the necessity of custodial interrogation. The apprehension expressed by the prosecution that the petitioner may evade investigation or frustrate the process cannot be said to be wholly unfounded, especially considering the alleged role attributed to him in the supply chain.

8. It is befitting to mention here that while considering a plea for grant of anticipatory bail, the Court has to equilibrate between safeguarding individual rights and protecting societal interest(s). The Court ought to reckon with the magnitude and nature of the offence; the role attributed to the accused; the need for fair and free investigation as also for reaching impact of such alleged iniquities on society. A profitable reference in this regard is being made to the dicta passed by the Hon'ble Supreme Court titled as ***State v. Anil Sharma, (1997) 7 SCC 187 : 1997 SCC (Cri) 1039]***, the Supreme Court held as under, relevant whereof reads as under:

> *"6. We find force in the submission of CBI that custodial interrogation is qualitatively more elicitation-oriented than questioning a suspect who is well-ensconced with a favourable order under Section 438 of the Code. In a case like this, effective interrogation of a suspected person is of tremendous advantage in disinterring many useful informations and also materials which would have been concealed. Success in such interrogation would elude if the suspected person knows that he is well protected and insulated by a pre-arrest bail order during the time he is interrogated. Very often interrogation in such a condition would reduce to a mere ritual. The argument that the custodial interrogation is fraught with the danger of the person being subjected to third-degree methods need not be countenanced, for, such an argument can be advanced by all accused in all criminal cases. The Court has to presume that responsible police officers would conduct themselves in a responsible manner and that those entrusted with the task of disinterring offences would not conduct themselves as offenders."*

At this stage, there is no material on record to suggest that a *prima facie* case is not made out against the petitioner. On the contrary, the material collected during the course of investigation appears to establish a reasonable basis for the accusations levelled against him. In such circumstances, the grant of anticipatory bail at this stage would not be appropriate, as it is likely to cause serious impediment to the ongoing and effective investigation.

9. Accordingly, this Court is of the considered opinion that the petitioner does not deserve the concession of anticipatory bail in the factual *milieu* of the case in hand. Moreover, custodial interrogation of the petitioner may be necessary to trace the source of supply of contraband & to unravel the truth. The petition is, thus, devoid of merits and is hereby **dismissed**.

10. Nothing said hereinabove shall be deemed to be an expression of opinion upon merits of the case/investigation.

11. Pending application(s), if any, shall also stand disposed off.

(SUMEET GOEL)
JUDGE

March 25, 2026
Naveen

Whether speaking/reasoned:	Yes/No
Whether reportable:	Yes/No