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**126 IN THE HIGH COURT OF PUNJAB AND HARYANA  
AT CHANDIGARH**

**CRM-M-26626-2026**

Date of Decision: 20.05.2026

Kaushal Rani and another

..... Petitioners

Versus

State of Haryana and others

.....Respondents

**CORAM: HON'BLE MR. JUSTICE RAJESH BHARDWAJ**

Present: Mr. Banka Bihari Panda, Advocate and  
Mr. Sanwar Ali, Advocate, for the petitioners.

**Rajesh Bhardwaj, J. (ORAL)**

1. Prayer in the present petition is for issuance of direction to respondents No.2 and 3 for prohibition of registration of multiple FIRs arising from the same transactions, grievances, cause of action, same set of facts and allegations, and for clubbing the FIR No.405 dated 25.10.2025, under Sections 316(2) and 318(2) of BNS, 2023 and Section 3 of the Haryana Protection of Interest of Depositors in Financial Establishments Act, 2014, registered at Police Station City Gohana, District Sonapat and FIR No.417, dated 06.44.2025, under Sections 316(2) and 318(2) of BNS, 2023 and Section 3 of Haryana Protection of Interest of Depositors in Financial Establishments Act, 2014, registered at Police Station City Gohana, District Sonipat and lateron FIR No.115 dated 27.04.2026 registered under Sections 316(2) and 318(2) of BNS, 2023 and Section 3 of Haryana Protection of Interest of Depositors in Financial Establishments Act, 2014, at Police Station City Gohana, District Sonipat, in view of the legal representation dated 01.05.2026.

2. Learned counsel for the petitioners has submitted that on the same cause of action, three different FIRs have been lodged against the



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petitioners in the same Police Station. He has submitted that the petitioner is seriously prejudiced in defending himself in all the FIRs which are registered at same police station and, thus, all these FIRs deserve to be clubbed. In support of his arguments, he relied upon a recent judgment of the Supreme Court rendered in the case of **Alok Kumar vs. The State of Bihar & Ors., Special Leave to Appeal (Crl.) No.4073/2025**, decided on 12.08.2025 and has submitted that FIR No. 405 dated 25.10.2025 be treated as the principal/main FIR, and that all other FIRs registered against the petitioner on similar allegations by different complainants, as well as also the FIRs that may be registered against the petitioner in future with respect to the same allegations at any police station, including the same police station, be treated as statements under Section 161 of the Cr.P.C.

3. Notice of motion.

4. Mr. Sumit Jain, Addl. AG, Haryana, accepts notice on behalf of the State. He is in agreement with the argument raised by the learned counsel for the petitioner in view of the law settled by the Hon'ble Supreme Court regarding clubbing of the FIRs.

5. Mr. Pradeep Chhoker, Advocate, accepts notice on behalf of the complainant.

6. After hearing learned counsel for the parties, it is discernible that the prayer made by learned counsel appearing on behalf of the petitioners regarding clubbing of the FIRs registered against the petitioners on the same allegations by different complainants is in consonance with the law settled by the Supreme Court in **Alok Kumar's** case (supra), in which the Supreme Court has held as under:-



“15. In such circumstances, referred to above, the first thing that we should do is to order clubbing of all the 81 FIRs/Criminal Cases registered against the petitioner.

16. We direct that the very first FIR registered against the petitioner dated 11.01.2018 with the Shastri Nagar Police Station, Patna, Bihar shall be treated as the main FIR. All other First Information Reports shall be treated as statements under Section 161 of the Criminal Procedure Code, 1973 (for short “the CrPC”). We are passing this order in tune with the decision of this Court in the case of “Satinder Singh Bhasin v. State of U.P. and Another” reported in 2023 (14) SCC 805.

17. We clarify that any FIR that may be registered against the petitioner and the company in future with respect to delivery of property to home buyers shall also be treated as a Statement under Section 161 of the CrPC.”

7. Recently, Hon’ble Supreme Court in **Amit Katyal and another vs. State of Haryana and another**, passed in **Writ Peition** (CRL.) No. 67/2025 decided on 18.05.2026, held as under under:-

“23. The material produced before us show that though the FIRs were registered at various places i.e. some in Delhi and some in Haryana, a common thread in the nature of grievances raised by the complainants, who are primarily homebuyers, that in spite of an assurance given by the petitioners and money accepted by the petitioners, the petitioners failed to hand over the possession of flats to the respective homebuyers. Insofar as the allegation in respect of transfer of money is concerned, it is only in the FIR complaint registered at Haryana and as certain properties are situated in State of Haryana, the Enforcement Directorate entered in the scene. Admittedly, in one of the FIR registered in New Delhi namely, FIR No. 52 of 2016, though there were allegations of common offences under Section 406/420 and 120 IPC against the petitioners, the final report submitted by the Investigating Agency i.e. the Economic Offences Wing



submitted that the transactions between the parties were clearly civil in nature and no inducement/misrepresentation /concealment could be established. There is also some merit in the submissions of the learned senior counsel for the Petitioners that the multiplicity of the offences registered at various places would cause some prejudice to the Petitioners. It is submitted by Mr. Raju that considering the nature of allegations, the Haryana Police constituted SIT and an extensive investigation is carried out by the Haryana Police. Mrs. Bhati submitted that Delhi Police is having no objection if the investigation is carried out by Haryana Police.

24. In such a situation, the principle laid down in T.T. Antony v. State of Kerala (Supra), as consistently reaffirmed in subsequent decisions of this Court, squarely applies, inasmuch as there cannot be multiple FIRs in respect of the same occurrence or transaction giving rise to cognizable offences. The scheme of the Code of Criminal Procedure postulates a single, comprehensive investigation, with liberty to the investigating agency to conduct further investigation and file supplementary reports, rather than permitting parallel and overlapping investigations in different fora.

25. Permitting multiple FIRs and investigations in different jurisdictions on the same set of facts would not only be contrary to the settled legal position but would also result in avoidable multiplicity of proceedings, conflicting findings and serious prejudice to the petitioners. At the same time, consolidation of 16 such FIRs at one place would subserve the ends of justice by ensuring a coordinated, effective and complete investigation, while also safeguarding the right of the petitioners to mount an effective and meaningful defence in a singular proceeding.

26. This Court is of the considered opinion that the subsequent FIR bearing No. 439/2024 registered at Police Station Sector-65, Gurugram, Haryana arises out of the same set of allegations and forms part of the same transaction which is already the



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subject matter of FIR No. 30/2019 registered at the Economic Offences Wing, Delhi. Permitting parallel investigations in such circumstances would not only be contrary to the scheme of the Code of Criminal Procedure but would also result in manifest prejudice to the petitioners and multiplicity of proceedings.”

8. In view of the aforesaid discussion, the present petition is allowed and keeping in view the law settled by the Supreme Court in **Alok Kumar** and **Amit Katyal**'s cases (supra), it is ordered that FIR No.405 dated 25.10.2025, under Sections 316(2) and 318(2) of BNS, 2023 and Section 3 of the Haryana Protection of Interest of Depositors in Financial Establishments Act, 2014, registered at Police Station City Gohana, District Sonapat against the petitioners be treated as the principal/main FIR and all other two FIRs mentioned in para No.1 of this order, based on the similar allegations and lodged by the different complainants, be treated as statements under Section 161 of the Cr.P.C. It is also ordered that any FIR that may be registered against the petitioner in future involving similar allegations be also treated as a statement under Section 161 of the Cr.P.C.

(RAJESH BHARDWAJ)  
JUDGE

20.05.2026

sharmila

Whether Speaking/Reasoned :  
Whether Reportable :

Yes/No  
Yes/No