

स्विकारले
Rastur
41/9/20
आवक लिपीक
पोलीस उप-आयुक्त,
परिमंडळ-९, मुंबई, जेणे कार्यालय

Rhea Indrajit
Chakraborty
101, Primrose
Apartments,
Near Ajivasan Hall,
Next to SNDT College
Juhu Road, Santacruz
(West),
Mumbai - 400054.

बारनिशी लेखनिक
वादि पोलीस ठाणे, मुंबई 13/06/20.
दिनांक/...../..... 2020

Date: 6th September 2020

To,
Senior Inspector of Police,
Bandra Police Station
Bandra (West), Mumbai 400050

Subject: Complaint against Priyanka Singh, Dr. Tarun Kumar and other known and unknown persons for an offence under the provisions of the Indian Penal Code, 1860, the Narcotics Drugs and Psychotropic Substances Act, 1985, and the Telemedicine Practice Guidelines, 2020.

Respected Sir,

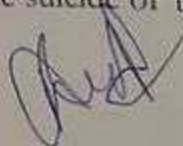
I, Rhea Indrajit Chakraborty, [REDACTED]

[REDACTED] hereby address you as under:

1. I say that the late Sushant Singh Rajput (hereinafter referred to as "the Deceased") and I were known to each other over the past several years as we were both working in the Indian Film Industry. We had maintained a cordial friendship and would occasionally communicate with each other. In April 2019, the Deceased and I had attended a party hosted by the film fraternity and shortly thereafter we began dating each other. I say that we officially moved in together in December 2019 at our residence [REDACTED] till the 8th of June 2020. I say that on 14th June 2020, the Deceased was found dead at the said residence.

[Signature]

2. I say that during the course of my relationship with the Deceased, the Deceased had been undergoing treatment for various mental health issues and had been diagnosed as suffering from Bipolar Disorder by multiple renowned doctors. However, the Deceased was not disciplined in respect of his treatment and would often abruptly stop his medication to the dismay of his doctors and myself.
3. I say that on the morning of 8th June 2020, the Deceased had been on his phone incessantly and when I enquired what he was doing, he showed me the messages he was exchanging with his sister Priyanka Singh. I say that I was shocked upon reading the said messages as his sister Priyanka had sent him a list of medications to take. I explained to the Deceased that given the seriousness of his condition, and the fact that he already had medications prescribed by doctors who had examined and treated him over several months, he ought not to take any other medication, least of all medication being prescribed by his sister who has no medical degree. I say that the Deceased and I disagreed on this aspect and he insisted that he would only take the medicine his sister was prescribing him. The Deceased then proceeded to ask me to leave the house as his other sister Meethu Singh was coming to live with him and would take care of him. It was thus that I came to leave our residence at Mount Blanc, Bandra, and this was also the last time that I saw the Deceased alive.
4. I say that subsequent to the death of the Deceased, the Bandra Police Station initiated an enquiry as per Section 174 of the Code of Criminal Procedure, 1973. I say that in respect of the said enquiry, I visited the Bandra police station on 18th June 2020 and 17th July 2020 and extended my full cooperation in respect of the said enquiry.
5. I say that despite a lapse of several weeks, as there was no clarity in respect of the circumstances leading to the death of the Deceased, I addressed a message on social media to Amit Shah, Minister of Home Affairs, Government of India, on 16th July 2020, requesting and pleading with him to transfer the case and investigation to the Central Bureau of Investigation, India, so that they could carry out a thorough investigation into the death.
6. I say that subsequently, I was shocked to discover that the father of the Deceased had registered a First Information Report No. 241 of 2020 dated 25th July 2020 at Rajiv Nagar police station, Patna, Bihar against my family members and myself for abetting the suicide of the Deceased and



at that time, he had informed his sister that he would not be able to obtain the said medication without a prescription. Shockingly it has now come to light that his sister Priyanka had subsequently on the same day sent him a prescription by one Dr. Tarun Kumar, an Associate Professor of Cardiology from Dr. Ram Manohar Lohia Hospital, New Delhi.

11. I say that prime facie the said document appears forged and fabricated. In addition, the said Dr. Tarun Kumar appears to have prescribed medication controlled under the Narcotic Drugs and Psychotropic Substances Act, 1985 to the Deceased without any consultation as mandated by Law. In fact, the drugs prescribed by Dr. Kumar were prohibited from being prescribed electronically under the Telemedicine Practice Guidelines issued on 25th March 2020, which constitutes Appendix 5 of the Indian Medical Council (Professional Conduct, Etiquette and Ethics Regulation, 2002).

12. I say that in the prescription dated 8th June 2020, Dr. Kumar has prescribed Nexito 5 mg, Librium 10 mg and Lonazep MD 0.5mg to the Deceased for anxiety. It is pertinent to note that the Tablet Librium is Chlordiazepoxide which appears at Item No. 36 in the List of Psychotropic Substances under the NDPS Act, while Nexito and Lonazep MD both contain Clonazepam which appears at Item No. 38 in the List of Psychotropic Substances under the NDPS Act.

13. I say that Clause 3.7.4 of the Telemedicine Practice Guidelines provides as under:

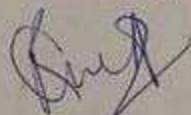
"...Prohibited List: An RMP providing consultation via telemedicine cannot prescribe medicines in this list. These medicine have a high potential of abuse and could harm the patient or the society at large if used improperly.

Medicines listed in Schedule X of Drug and Cosmetic Act and Rules or any Narcotic and Psychotropic substance listed in the Narcotic Drugs and Psychotropic Substances, Act, 1985."

14. I say that Clause 3.7.1.4 of the Telemedicine Practice Guidelines provides as under:

"Misconduct

It is specifically noted that in addition to all general requirements under the MCI Act for professional conduct, ethics etc, while using telemedicine all actions that wilfully compromise patient care or privacy and confidentiality, or violate any prevailing law are explicitly not permissible. Some examples of actions that are not permissible:



- RMPs insisting on Telemedicine, when the patient is willing to travel to a facility and/or requests an in-person consultation
- RMPs misusing patient images and data, especially private and sensitive in nature (e.g. RMP uploads an explicit picture of patient on social media etc)
- RMPs who use telemedicine to prescribe medicines from the specific restricted list
- RMPs are not permitted to solicit patients for telemedicine through any advertisements or inducements"

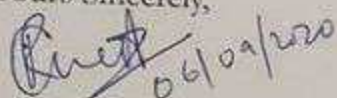
15. I say that thus the actions of Priyanka Singh and Dr. Kumar in prescribing psychotropic substances without any consultation or examination is in violation of various provisions of the Narcotics Drugs and Psychotropic Substances Act, 1985 and the Telemedicine Practice Guidelines, 2020. In addition, the prescription prepared by them in connivance with each other is a fabricated and false document given that the same reflects the Deceased as an OPD patient when on the date and time at which the said prescription was sent, the Deceased was very much in Mumbai, Maharashtra and not in New Delhi. I say that it is also surprising that that Dr. Tarun Kumar being a Cardiologist sought fit to prescribe a person he did not know and had never met with Psychotropic substances.
16. I say that the Deceased died merely 5 days after he obtained the said prescription wherein he was unlawfully prescribed psychotropic substances at the behest of his sister Priyanka and the said Dr. Kumar. Given the death of the Deceased and the investigations surrounding the circumstances of his death, it is imperative that the actions of Priyanka Singh, Dr. Tarun Kumar and other known and unknown persons who conspired to prescribe the Deceased, such controlled substances ought to be investigated as well.
17. I say that it is imperative that the actions of Priyanka Singh, Dr. Tarun Kumar and other known and unknown persons be investigated and that it be determined as to how they came to provide the Deceased with such a bogus and unlawful prescription. It is also required to be investigated as to whether the Deceased then proceeded to take the medicines thus prescribed, which may have contributed to his death and/or further deteriorated his mental health.
18. In light of what is stated hereinabove, there is strong prima facie evidence against Priyanka Singh, Dr. Tarun Kumar and other known and unknown persons for an offence under the provisions of the Indian

Penal Code, 1860, the Narcotics Drugs and Psychotropic Substances Act, 1985 and the Telemedicine Practice Guidelines, 2020.

19. I say that thus I request that a First Information Report be registered against Priyanka Singh, Dr. Tarun Kumar and other known and unknown persons for an offence under the provisions of the Indian Penal Code, 1860, the Narcotics Drugs and Psychotropic Substances Act, 1985 and the Telemedicine Practice Guidelines, 2020 and that a detailed investigation be conducted in respect thereof.

I look forward to your prompt action in this regard.

Thanking You,
Yours Sincerely,

 06/09/2020

Rhea Indrajit Chakraborty

Copy to:

1. **The Commissioner of Police,**
Crawford Market, Mumbai 400001
2. **The Deputy Commissioner of Police,**
Zone VIII, Bandra, Mumbai 400050